

Toxic Water Fluoridation and How to Remove It

Updated 04/18/2005

Outline

Part I - Fluoridation in Pennsylvania

Part II - Scientists Stand in Opposition to Fluoridation

Part III - How to Go About Stopping Fluoridation in Your Community

Part I - Fluoridation in Pennsylvania

Is your water fluoridated? You can find out at:

<http://www.actionpa.org/fluoride/map/>

Fluorides are considered poisons in Pennsylvania law. Fluoride acids are among the most corrosive chemicals known. The fluoridation chemicals used in public water supplies are waste products of the phosphate fertilizer industry. If the industry wasn't permitted to dump this waste product into our drinking water, they'd have to dispose of it as hazardous waste.

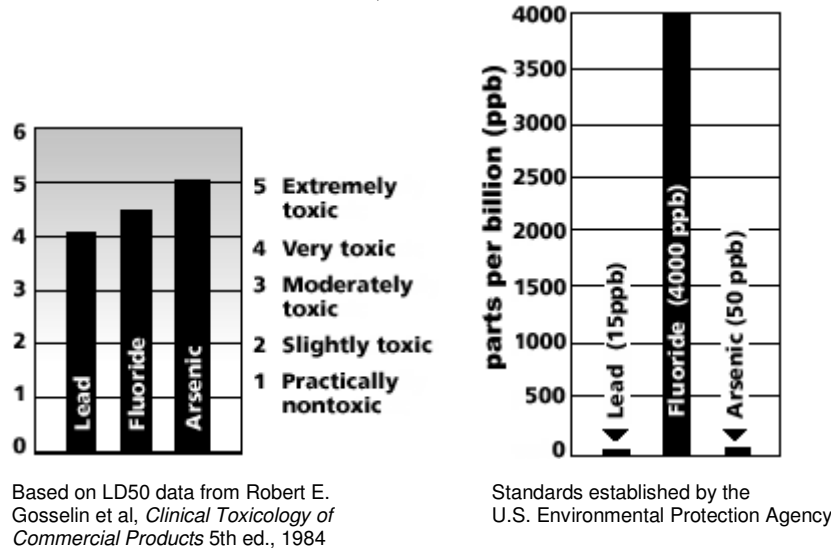
Fluoride exposure has been linked to many health problems, including hip fractures, neurological damage, ADD/ADHD, lead poisoning, Alzheimer's Disease, birth defects, skeletal fluorosis, dental fluorosis, early onset of puberty, immune system suppression, bone cancer and other rare forms of cancer.

There have been several attempts in recent years to fluoridate specific communities in Pennsylvania (where 54% of the public's drinking water is already mass fluoridated). After 40 years of local opposition, Allentown was fluoridated in November 2000. In the past few years, Elwood City, Scranton, and Erie have been targeted for fluoridation and there is talk about fluoridating the Philadelphia Suburban Water system. During the 1990's fluoridation was stopped in Yardley (Bucks County) and York. In 2003, Shaler, PA (Allegheny County) voted down fluoridation. Now, York is being threatened yet again.

There have been ongoing attempts to force the entire state to add fluoride to the drinking water. In 1973, an attempt to use the courts to require state-wide fluoridation was stricken down. Bills to make fluoridation mandatory in the entire state have been defeated several times in the past decade. Due to the efforts of concerned Pennsylvanians, the Fluoridation Act was blocked in the 1999-2000 legislative session and again in the 2001-2002 legislative session. In these last two sessions, we have managed to keep the bills stuck in committee while building support for alternative legislation known as the "Fluoridation Choice Act," which would give communities the right to remove fluoride from their drinking water if they so choose.

What's wrong with this picture?

A comparison between the toxicity and maximum contaminant levels of lead, fluoride and arsenic



Part II - Scientists Stand in Opposition to Fluoridation

Please download the Water Fluoride brochure to learn more about scientists who have stood up against water fluoridation at: <http://www.actionpa.org/fluoride/brochure.pdf>

The following 5 excerpts come from Dr. Paul Connett's 50 Reasons to Oppose Fluoridation. The entire document, including scientific references, can be obtained here: <http://www.fluoridealert.org/50-reasons.pdf>

- Modern research shows that decay rates were coming down before fluoridation was introduced and have continued to decline even after its benefits would have been maximized.
- The level of fluoride put into water (1 ppm) is up to 200 times higher than normally found in mothers' milk (0.005 – 0.01 ppm). There are no benefits, only risks, for infants ingesting this heightened level of fluoride at such an early age (this is an age where susceptibility to environmental toxins is particularly high).
- Five studies from China show a lowering of IQ in children associated with fluoride exposure.
- Fluoridation is unethical because individuals are not being asked for their informed consent prior to medication. This is standard practice for all medication, and one of the key reasons why most of Western Europe has ruled against fluoridation. As one doctor aptly stated,
 - “No physician in his right senses would prescribe for a person he has never met, whose medical history he does not know, a substance which is intended to create bodily change.”
- The Union representing the scientists at US EPA headquarters in Washington DC is now on record as opposing water fluoridation. According to the Union's Senior Vice President, Dr. William Hirzy:
 - “In summary, we hold that fluoridation is an unreasonable risk. That is, the toxicity of fluoride is so great and the purported benefits associated with it are so small - if there are any at all - that requiring every man, woman and child in America to ingest it borders on criminal behavior on the part of governments.”

Part III - How to Go About Stopping Fluoridation in Your Community

This document was derived from the original DEP notification, Document Number 383-2125-001, to include only informational material necessary for discontinuing water fluoridation. Original may be obtained from the DEP at the following web address:

<http://www.dep.state.pa.us/eps/docs/cab200149b1126000/fldr200149e0051190/fldr200149e0052191/doc200428e045100b/383-2125-001.pdf>

DEPARTMENT OF ENVIRONMENTAL PROTECTION

Bureau of Water Supply and Wastewater Management

DOCUMENT NUMBER: 383-2125-001

TITLE: Proposals to Add or Remove Fluoridation Treatment by a Community Water System

EFFECTIVE DATE: March 13, 2004

AUTHORITY: Pennsylvania's Safe Drinking Water Act (35 P.S. §721.1 et seq.) and regulations at Title 25 Pa. Code Chapter 109

POLICY: Department of Environmental Protection (DEP) staff will follow the guidance and procedures presented in this document to direct and support implementation of required activities for community water systems that choose to add or remove water fluoridation treatment.

PURPOSE: The purpose of this document is to clarify existing regulatory requirements regarding the addition or removal of water fluoridation treatment.

APPLICABILITY: This guidance will apply to community water systems that choose to add or remove water fluoridation treatment.

DISCLAIMER: The policies and procedures outlined in this guidance are intended to supplement existing requirements. Nothing in the policies or procedures shall affect regulatory requirements. The policies and procedures herein are not an adjudication or a regulation. There is no intent on the part of DEP to give the rules in these policies that weight or deference. This document establishes the framework within which DEP will exercise its administrative discretion in the future. DEP reserves the discretion to deviate from this policy statement if circumstances warrant.

LOCATION: Volume 22, Tab 5

Proposals to Remove Fluoridation Treatment by a Community Water System

The Pennsylvania Department of Environmental Protection (DEP) supports local decision making on the issue of fluoridation. It is not DEP's intent or position to encourage or discourage fluoridation.

Why is DEP involved in the issue of fluoridation treatment?

DEP regulates the design, construction and operation of treatment processes at public water systems within the Commonwealth. According to DEP's regulations, water systems may not use chemicals or materials which may come in contact with the water or affect the quality of the water unless the chemicals or materials are acceptable to DEP (Title 25 Pa. Code §109.606(a)). Fluoridation chemicals certified under ANSI/NSF Standard 60 are acceptable to DEP (Title 25 Pa. Code §109.606(b)).

Whenever a community water system (CWS) proposes to adjust a treatment process, the water supplier must obtain a construction permit before making any modifications, and an operation permit before operating any new or modified facility (Title 25 Pa. Code §109.501).

Pennsylvania's public water systems generally do not use sources that naturally contain significant fluoride levels. The fluoride maximum contaminant level (MCL) for drinking water was established by the United States Environmental Protection Agency to prevent the possibility that children's teeth, usually in children less than 9 years old, could be damaged. The condition, called mottling and also known as dental fluorosis, may cause brown staining and/or pitting of the teeth. DEP regulates fluoridation to ensure that the treatment process maintains does not exceeding the maximum contaminant level of fluoride (2 mg/L).

To regulate the fluoride level in the drinking water, DEP conditions operation permits to require that suppliers closely monitor the level of fluoride being added. Suppliers providing such treatment must perform on-site fluoride monitoring at least once a day and maintain the test results on file. DEP staff also review those results during routine surveillance visits. Should an operational problem occur, the water supplier is also required to report the circumstances to DEP within 1 hour of learning of the problem (Title 25 Pa. Code §109.701(a)(3)). In the event that the fluoride level in the finished water exceeds the MCL value, the supplier must provide public notice to all consumers and take corrective actions to quickly return to compliance. In the event that the fluoride level falls below the level recommended to prevent tooth decay, the supplier must quickly take corrective actions to again meet their permit condition(s).

As defined in Title 25 Pa. Code §109.503(b)(1), the addition or removal of a treatment technique at an existing permitted community water system involves a permit modification. The public water system must therefore obtain a major permit amendment prior to the installation, operation or removal of fluoridation facilities.

The information below explains DEP's procedures regarding removing fluoridation at a community water system.

What is involved in stopping fluoridation?

A community water system that proposes to discontinue fluoridation must first obtain an amended water supply permit from DEP as per 109.503(b)(1). Until the amended operation permit is issued and its conditions satisfied, the supplier must continue fluoridation in accordance with their present permit.

A community water supplier, to facilitate an orderly transition from a fluoridated to a non-fluoridated system, needs to provide advance notice to consumers and medical professionals

before fluoridation is stopped. Therefore, the supplier should provide evidence in their permit application that consumers and the medical professionals in the affected service area have been adequately notified of the community water supplier's decision to cease operation of fluoridation treatment.

Advance notification may include, but is not limited to, items such as informational leaflets or pamphlets distributed within the service area, newspaper articles, paid advertisements, radio and TV announcements, or direct mailings to each customer. Fluoridation proposals often receive serious consideration and generate considerable controversy and publicity. In these cases, public meetings are usually held. Referendum votes are sometimes taken. All of these activities serve to provide notice to the customers, physicians, dentists and other medical professionals that the water supplier is proposing to fluoridate. Such notices, public hearings or referendums are considered adequate public notification prior to issuance of a construction permit.

Any operation permit approving the cessation of fluoridation should include a special condition to require public notification before addition is stopped. A DEP-approved public notice should be issued following the distribution requirements for Tier 2 public notice found in Title 25 Pa. Code §109.409(c)(1) [**code included below**], to all consumers and medical professionals in the affected service area 30 days prior to discontinuation of fluoridation. The water supplier should also be required to submit proof of that notification to DEP within 10 days of issuance.

A supplier that removes fluoridation should also take the opportunity in the next annual CWS Consumer Confidence Report (CCR) to remind customers of the date that fluoridation was discontinued.

§ 109.409. Tier 2 public notice—form, manner and frequency of notice.

Obtainable at: <http://www.pacode.com/secure/data/025/chapter109/s109.409.html>

(c) *Form and manner of a Tier 2 public notice.* A public water supplier shall provide the initial public notice and any repeat notices in a form and manner that is reasonably designed to reach all persons served in the required time period. The form and manner of the public notice may vary based on the specific situation and type of water system, but the public water supplier shall at a minimum meet the following requirements:

(1) Unless directed otherwise by the Department in writing, community water systems shall provide notice using the following forms of delivery:

(i) Mail or other direct delivery to each customer receiving a bill and to other service connections to which water is delivered by the public water system.

(ii) Any other method reasonably designed to reach other persons regularly served by the system, if they would not normally be reached by the notice required in subparagraph (i). Those persons may include those who do not pay water bills or do not have service connection addresses such as house renters, apartment dwellers, university students, nursing home patients or prison inmates. Other methods may include publication in a local newspaper, delivery of

multiple copies for distribution by customers that provide their drinking water to others (such as apartment building owners or large private employers), posting in public places served by the system or on the Internet or delivery to community organizations.

(2) Unless directed otherwise by the Department in writing, noncommunity water systems shall provide notice using the following forms of delivery:

(i) Posting the notice in conspicuous locations throughout the distribution system frequented by persons served by the system, or by mail or direct delivery to each customer and service connection, when known.

(ii) Any other method reasonably designed to reach other persons served by the system if they would not normally be reached by the notice required in subparagraph (i). Those persons may include those served who may not see a posted notice because the posted notice is not in a location they routinely pass by. Other methods may include publication in a local newspaper or newsletter distributed to customers, use of e-mail to notify employees or students or delivery of multiple copies in central locations such as community centers.

Source

The provisions of this § 109.409 adopted August 9, 2002, effective August 10, 2002, 32 Pa.B. 3894; amended June 18, 2004, effective June 19, 2004, 34 Pa.B. 3130. Immediately preceding text appears at serial pages (290520) to (290522).

For more information, visit our website:

<http://www.actionpa.org/fluoride/>

Have questions about water fluoridation? Contact Mike Ewall at **215-743-4884** or email **catalyst@actionpa.org**