

From: "Gene Burke"
To: "Cynthia Coshita" <coshita@oehha.ca.gov>
CC: <burkegene@msn.com>
Date: 5/5/2009 1:45 PM
Subject: Comments for the identification and addition of fluoride chemicals to the Proposition 65

Re: Fluoride and its Salts; Comments for their addition to the Prop. 65 list

Cynthia Oshita
Office of Environmental Health Hazard Assessment
Proposition 65 Implementation
P.O. Box 4010 1001 I Street, 19th floor
Sacramento, California 95812-4010

Dear Ms. Oshita and members of the OEHHA Carcinogen Identification Committee:

I thank your Committee for inviting our public comments in connection with, in particular, fluoride and its salts as chemical candidates for possible listing on the Proposition 65 list.

As is well known, sodium fluoride (NaF) (a known pesticide and rodenticide) and silicofluoride chemical products (hydrofluosilicic acid, in particular) have been used since 1945 as the exclusive water fluoridation products; and they now adulterate, if I may use that term, over 67% of our municipal water supplies. May I suggest that they be placed at the top of the CIC's list of fluoride chemicals warranting your scientific scrutiny.

The egregious hazardous ratings of all of the fluoride-and-its-salts-containing products used for artificial water fluoridation present, for many of us, a profound riddle in supposed consumer health safety and regulation. Plus -when the mandatory 'black box' warnings with the accompanying DO NOT SWALLOW poison-warning as required on all fluoride toothpastes are added into that riddle, it's even more perplexing. Perhaps your committee can figure if all this is healthful and judicious activity- or not.

Related fundamental question.

When swallowed, are hazmat-rated fluoride used for fluoridation and black-boxed fluoride used in toothpaste potentially cancer-causing? Or not?

Toxicological examinations, in particular, of NaF and the silicofluorides as candidates for Prop 65 listing have seemed warranted for many years. Perhaps now, with the EPA's and OEHHA's new leadership, an end to the paucity of governmental scrutiny and necessary regulatory processes can now begin.

An abundance of scientific evidence clearly exists-- hidden in plain sight perhaps?-- for the likelihood that the subject fluoride products-- poisons by honest definition, (in my view)--when consumed habitually for long periods of time are or could likely be cancer-causing and/or cancer-promoting chemicals.

Next, others besides myself likely have suggested that a crucial and pivotal mis-step in carcinogenicity assessment possibly has resulted in the enabling of huge health and economic costs to our human and animal societies.

That perceived mis-step relates to the still-controversial 1991 NTP Program's original carcinogenicity rating for "fluoride." As you likely know, from this rat-testing the NTP'S original rating of probably carcinogenic was rather inexplicably downgraded later to an ambivalent and inconsequential rating. The EPA's then-whistleblower Dr. William Marcus (r.i.p.) and the EPA Union's former president, Dr. Robert Carton, I believe had asserted that it was a profound mis-step indeed -and apparently too a trumping of politics over science?

Significantly, pharmaceutical grade sodium fluoride was used in that NTP toxicological testing (on rodents).

One can only speculate, of course, if the carcinogenicity rating might have been even higher if the industrial-grade hazmat-rated sodium fluoride

(used in fluoridation) had been the NTP test chemical ???

I respectfully request that your CIC committee consider recommending that the 1991 NTP testing be repeated using ANY of the fluoride-and-its-salts products that are commonly used in water fluoridation--and under conditions of strict scientific scrutiny disciplines.

Finally, as we are taught, since "it's the dosage that determines whether a chemical is a poison or not," it has been argued/questioned by many reputable scientists--among them a majority of scientists and members of the US EPA NTEUnion hq'd in Washington, D.C.--that the habitual intake of the subject fluorides are quite likely too high for many of us.

Bassin, Yiamouyiannis, Burk, Connett and many other good scientists have provided extensive research linking cancer to fluoride and its salts.

Fluoride the Aging Factor, 3rd edition, 1993, by Dr. John Yiamouyiannis. dedicates an 18-page briefing in Chapter 9 entitled: CANCER.

I think you shall find that chapter contains a wealth of researched information that your Committee might consider examination.

Your office's acknowledgment of receipt of this letter would be much appreciated.

Thank you.

Sincerely,

Gene Burke

Environmental Health Projects
PO Box 358 Santa Monica, CA 90406;
(310) 451-9950;

"In point of fact, fluorine causes more human cancer death, and causes it faster, than any other chemical."

Dean Burk PhD; former chief of cytochemistry at the U.S. National Cancer Institute.

References:

A Resolution Addressing the Silicofluoride Controversy- Resolution submitted to the American Public Health Association by Myron Coplan, chemical engineer, & Dr. Robert Carton, past-President of EPA Headquarters Union for consideration at APHA's October 21-25, 2001, conference in Atlanta, Georgia.

Bucher JR, et al; "Results and conclusions of the National Toxicology Program's rodent carcinogenicity studies with sodium fluoride" Int J Cancer; 48(5):733-7, July 9,1991

Health Effects: NTP Bioassay on Fluoride/Cancer (1990)
<http://www.fluoridealert.org/health/cancer/ntp/index.html>

Fluoride the Aging Factor, 3rd edition, 1993, by Dr. John Yiamouyiannis.

The Fluoride Deception, 2004, by Christopher Bryson

EPA Union's Letter of Concern
<http://www.nteu280.org/Issues/Fluoride/flouridestatement.htm>

EPA Unions Call for Nationwide Moratorium on Fluoridation, Congressional Hearing on Adverse Effects, Youth Cancer Cover Up
<http://www.nteu280.org/Issues/Fluoride/Press%20Release.%20Fluoride.htm>

Fluoride Journal <http://www.FluorideResearch.Org>

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