



CHAPTER 280
BEN FRANKLIN STATION
P.O. BOX 7672
WASHINGTON, DC 20044
202-566-2785(V)
202-566-1460(F)
Website www.nteu280.org

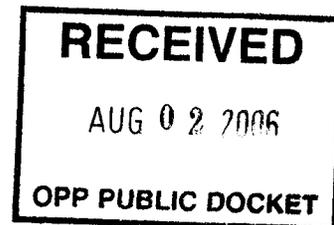
July 25, 2006

Office of Pesticide Programs
Regulatory Public Docket (7502P)
U.S. EPA
1200 Pennsylvania Ave., N.W.
Washington, D.C. 20460-0001

Please place the attached letter into Dockets EPA-HQ-OPP-2005-017 and EPA-HQ-OPP-2003-0373

Thank you,

J. William Hirzy, Ph.D.
Vice-President



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July 25, 2006

Hon. Stephen L. Johnson, Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

Dear Administrator Johnson:

I am writing at the direction of the Executive Board of Chapter 280, National Treasury Employees Union, representing the professional employees here at headquarters of the U.S. Environmental Protection Agency.

The Board asked me to write to you about our concern that the Agency is setting itself - and by implication its employees - up for further embarrassment over the increased tolerance levels for fluoride on food stuffs. These increased tolerances come in connection with the use of sulfuryl fluoride as a fumigant, replacing methyl bromide in this application.

The increased tolerances have been supported by the Agency by reference to another standard set by the Agency, namely its Maximum Contaminant Level Goal (MCLG) for fluoride in drinking water, which is currently 4 milligrams per liter (4 mg/L). As you know, the National Research Council has very recently submitted a report to EPA stating that the 4 mg/L MCLG, a health-based standard, is not in fact protective of public health. For EPA to base tolerances for fluoride in foods, especially for foods to be consumed by infants and children who fall under the protection of the Food Quality Protection Act, flies in the face of both law and scientific integrity.

We sincerely hope that you will rescind the approval of sulfuryl fluoride as a food stuffs fumigant and the concomitant increased tolerances for residual fluoride on the foods. The Agency can cite the NRC report as the basis for this action, thus minimizing any further embarrassment to itself and the professional staff.

On behalf of the Executive Board, I am,

Sincerely,

J. William Hirzy, Ph.D.
Vice-President