

July 5, 2011

Office of Pesticide Programs
Environmental Protection Agency
1200 Pennsylvania Ave., N.W.
Washington, DC 20460

Re: Sulfuryl Fluoride; Proposed Order Granting Objections to Tolerances
Docket EPA-HQ-OPP-2005-0174

On January 10, the Environmental Protection Agency announced a proposed order to phase out sulfuryl fluoride, an insecticide and fumigant used on stored grain, such as wheat and oats; dried fruit; coffee and cocoa beans; and other foods. It is also used as a fumigation treatment on wooden structures, against termites and other wood-boring insects. If EPA's plan becomes final, many food uses of this fluoride-based pesticide would stop within 90 days. A three-year phase-out period would be extended for certain applications, including dried nuts and fruits and spraying in food-processing facilities such as flourmills.

The Environmental Working Group strongly supports EPA's proposed order. It reflects a growing consensus that the American public is exposed to excessive fluoride. For decades, public health agencies have erroneously reassured the public that fluoride is entirely safe. As a result, generations of children have been exposed to amounts of fluoride that could damage teeth and bones and that emerging science indicates could harm thyroid function and increase risks of bone cancer.

EPA's 2011 proposal came in response to objections filed by Environmental Working Group, Fluoride Action Network and Beyond Pesticides to the use of sulfuryl fluoride on food. In the same month, the U.S. Department of Health and Human Services proposed to reduce its recommended maximum level of fluoride in tap water from 1.2 to 0.7 parts per million, a 42 percent decrease.

Sulfuryl fluoride, manufactured by Dow AgroSciences and approved by EPA in 2004 as an alternative to ozone-depleting fumigant methyl bromide, is used for control of pests in food storage and processing facilities. EPA statistics indicate that sulfuryl fluoride is used in approximately 40 percent of such facilities across the country. Once sprayed, sulfuryl fluoride breaks down into fluoride, which can contaminate food. Over-exposure to fluoride from oral ingestion has been associated with multiple adverse health effects, including dental fluorosis (mottling and loss of tooth enamel) and skeletal fluorosis (joint pain, stiffness and bone fractures).

EPA's original permit to allow sulfuryl fluoride for use on foods relied on an outdated health risk assessment and significantly underestimated children's exposures to fluoride from all sources. After a new exposure and risk assessment was done, the EPA Office of Pesticide Program

concluded that the current legal limit of the pesticide residue on food does not adequately protect children from excessive fluoride exposures. After considering the aggregate exposures to fluoride from all sources, including drinking water and toothpaste, EPA found that sulfuryl fluoride does not meet the children's health protection requirements set under the Food Quality and Protection Act of 1996, which regulates pesticide safety.

EPA's decision to stop sulfuryl fluoride use is a step in the right direction, but, as EPA's recent exposure assessment indicates, sulfuryl fluoride represents just a fraction of Americans' overall fluoride exposure. Children under the age of 7 are particularly at risk of excessive fluoride exposure. It is of great concern that even if sulfuryl fluoride is eliminated from their diets, many children will still ingest too much fluoride. Further reductions in fluoride exposure are necessary to protect children's health more fully.

EWG has provided detailed comments to Health and Human Services about the impact of new water fluoridation guidelines, including shortcomings of EPA's new risk and exposure assessments for fluoride (copy of the letter is attached). Actions to reduce fluoride ingestion via drinking water and pesticide residues represent a step in the right direction toward protecting Americans from fluoride exposure. Yet EWG found that a significant body of scientific evidence supports an even more dramatic reduction to protect the health of infants, children and others who are most vulnerable to the surprising array of health problems associated with this common water additive. We urge EPA's Office of Pesticide Programs and Office of Water to join other agencies in committing to reduce substantially human exposures to fluoride from sources other than sulfuryl fluoride.

EPA's decision to withdraw sulfuryl fluoride tolerances is significant both in regard to the particular pesticide tolerances involved and in the context of reevaluating the health effects of fluoride. It sets an important example for future initiatives to address cumulative exposures to pesticides from multiple sources, a concept that is on the cutting edge of research and policy. EWG strongly supports EPA's action on sulfuryl fluoride. Yet in order to protect Americans from over-exposure to fluoride, the agency must go further by lowering fluoride content in drinking water.

Sincerely,

Sonya Lunder, MPH
EWG Senior Analyst

Olga V. Naidenko, PhD
EWG Senior Scientist

Cc:

Nancy Stoner, Acting Assistant Administrator for Water, U.S. EPA

Cynthia Dougherty, Director, Office of Ground Water and Drinking Water, U.S. EPA

Joyce Donohue, Office of Science and Technology, U.S. EPA
Howard Koh, Assistant Secretary for Health, U.S. Department of Health and Human Services

Attached: EWG's February 2011 comments to U.S. Department of Health and Human Services regarding proposed federal cap on fluoride in water