



DEPARTMENT OF THE ARMY  
HEADQUARTERS, FORT DETRICK  
FREDERICK, MARYLAND 21702-6000



APPLY TO  
ATTENTION OF:

MCHD-SHE (200-1a)

11 December 1996

MEMORANDUM FOR: U.S. Army Medical Command (Attn: MCHO-CL-W), 2050  
Worth Road, Fort Sam Houston, Texas 78234-6000

SUBJECT: Environmental Assessment For Fluoridation of Fort  
Detrick Drinking Water

1. **Purpose.** Request that MEDCOM take the lead in preparing the Environmental Assessment (EA) for Fluoridation of Fort Detrick drinking water, and if necessary review current policy of fluoridation.
2. **Background.** Fort Detrick had constructed facilities to dose hydrofluosilic acid to provide fluoride in its drinking water system. After operating for a relatively short period of time, key components corroded to the point that the system was shut down. The cause was that certain components had not been installed correctly. Correctly installing the replacement components is costly, and requires significant construction activity, and was therefore deferred until recently.
3. **Environmental Assessment.** Because of the long time that the post was without fluoridation, the issue of reinstating that practice became subject to the requirement of AR 200-2, Environmental Effects of Army Actions, especially since the requirements listed in AR 200-2 were not followed during the initial installation of the fluoridation facilities. A categorical exclusion was not appropriate, as the action did not meet the screening criteria listed on page 24, specifically A-31(c), "There is no environmentally controversial change to existing environmental conditions." Fluoridation of drinking water is a controversial issue in Frederick County. Accordingly an Environmental Assessment is required.
4. **Status.** A Delivery Order was issued to SAIC, under contract to US Medical Research and Material Command, to prepare an EA for this action. The contractor has prepared a internal review draft, enclosed. The EA identifies the "halo effect", that is the fluoride intake that is not attributed directly to drinking water consumption. The EA also estimated the halo effect and indicated that fluoride in the drinking water at 0.7 mg/l plus the other sources of fluoride would be the equivalent dose of 1.0



mg/l when the recommendations were first made, when there was effectively no halo effect. Current recommended practice, is 1.0 mg/l.

The draft has been distributed for internal review. We have received a number of comments. The most significant set are from Dr. Robert Carton, enclosed, and questions the efficacy and wisdom of fluoridation at any level. While paragraph two may be overly dramatic, the substance of many of the comments, particularly with regard to the recent research and findings regarding efficacy of fluoridation and the adverse health effects, could be serious. My staff has discussed this with the contractor. The cost to address these issues will be significant. If we do not address them now, we will certainly need to address them during the public comment period of the EA, along with any other comments that we receive.

Since we have received the draft from the contractor, my staff has become aware of the October 24, 1996 forum on fluoride at Clark University. At this forum a number of recently declassified documents from the Manhattan Project and related work were presented. Although a full reporting of this forum has is not yet available, a summary of these documents can be found in a news release found on "Business Wire", enclosed.

Considering the scope and import of the comments, and these recent developments, US Army Garrison Fort Detrick, is not equipped to technically address these issues. Also, if a decision to fluoridate were made, Fort Detrick would not have the resources to defend that decision in the face of these purported adverse health effects. This appears to be a policy issue and accordingly needs to be addressed by MEDCOM. We have put a hold on the contractor's work until we receive direction from MEDCOM.

5. Contacts. My point of contact for this issue is Dr. Henry Erbes, Chief, Environmental Management Division, DSN 343-7318.



HENRY O. TUELL, III  
Colonel, MS  
Commander

Enclosures

CC: MCFA-E (Gilbert Gonzalez) wo/encls  
MCHD-DS (LTC Lutka)  
MCMR-RCQ-E (Dr. Carton)