



STATE OF WASHINGTON

DEPARTMENT OF HEALTH

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October 8, 2015

TO: Keith Grellner, Chair  
Washington State Board of Health

FROM: Kathy Lofy, Health Officer  
Washington State Department of Health

SUBJECT: Recommendation to State Board of Health regarding petition for rule making

The Department of Health (department) recommends the State Board of Health (board) deny the petition to revise WAC 246-290-460, Fluoridation of drinking water, received from James Deal dated September 2, 2015. The petition requests the board to modify the rule to state that the fluoridation additives currently in use in Washington do not comply with NSF/ANSI Standard 60 and the additives cannot be used until toxicology tests are performed. It also directs the department to determine the fluoridation additives comply with NSF/ANSI Standard 60.

WAC 246-290-220(3) requires that any treatment chemicals added to water intended for potable use must comply with NSF/ANSI Standard 60. This includes all additives used for community water fluoridation. NSF International is an independent, internationally accredited organization that “develops public health standards and certification programs that help protect the world’s food, water, consumer products and environment.” The department relies on NSF International to evaluate and certify products for drinking water according to established standards and procedures.

In considering the petition, department and board staff reviewed available NSF International documentation related to NSF/ANSI Standard 60. Staff found the petition incorrectly concludes that the three chemical compounds used in fluoridation do not comply with NSF/ANSI Standard 60 because certain toxicity testing has not been conducted. Such testing is one of two methods for complying with NSF/ANSI Standard 60. Using the other method, NSF has set the allowable maximum use levels for fluorosilicic acid, sodium fluorosilicate, and sodium fluoride, which are NSF certified fluoridation products. Staff concluded NSF International applied their established standards and procedures when developing NSF/ANSI Standard 60 for fluoridation additives. The department is confident following NSF/ANSI Standard 60 is appropriate for community water systems that choose to fluoridate their drinking water.