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3RD DISTRICT, CONNECTICUT

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COMMITTEE ON THE BUDGET

August 7, 2008

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

Dear Administrator Johnson:

Thank you for your letter of June 4, 2008, in response to my letter of April 28, 2008, requesting that the Environmental Protection Agency (EPA) study the health and environmental impacts of chemicals in synthetic turf, especially as they relate to children and families. I am writing to request an update on the activities described in your letter, and to reiterate the urgency of thorough scientific investigation of this important issue.

First, I commend your efforts to form a workgroup to better understand the nature and extent of potential exposure to hazardous chemicals in fields and playgrounds where synthetic turf is used. I look forward to receiving an update on the activities of this working group, specifically 1) who the members are and their areas of expertise, 2) how many meetings have been held on this issue and what future meetings are planned, 3) what progress has been made to date, and 4) what conclusions has the group drawn to date with regard to both a) potential hazards, and b) next steps. I understand that EPA is planning a scientific meeting on the topic of tire crumbs and synthetic turf later this month, and I look forward to hearing about the outcome of that meeting.

In your June 4, 2008, letter, you noted that "the Consumer Product Safety Commission (CPSC) is undertaking work that will add to our understanding about the use of lead in synthetic turf, and it is hoped that this effort will help inform additional steps related to this aspect of the concern with synthetic turf." In light of that statement, I am particularly concerned that the report on lead in synthetic turf grass blades recently issued by the Consumer Product Safety Commission (CPSC) may have included flawed methodology. As such, the report did not support the conclusion that children are safe from exposure to lead when playing on these fields, let alone the conclusion that the fields are safe overall – given the other toxins and health problems that may be associated with synthetic turf.

The CPSC report itself notes that "this assessment is subject to a number of limitations." Indeed, I am concerned about the following apparent flaws in the study and unresolved issues regarding the health and safety effects of synthetic turf fields:

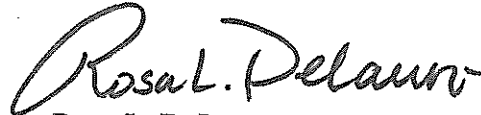
- All ten of the samples of green synthetic grass that were tested (Table 1, Appendix A) appear to have been taken from four fields manufactured by the same firm (Firm 1). Only the yellow stripes from two other firms (Firms 2 and 3) were tested. There are approximately 3500 synthetic fields currently in use nationally, and 800 additional fields installed each year at high schools, universities, stadiums, and public parks. Even if the other nine non-tested samples are taken into account, it seems questionable for the CPSC to characterize to the American people that *all* synthetic turf fields in the country are safe.
- Upon close examination, Table 1 in Appendix A contains gaps and unexplained variability in the data presented. For example, for the third entry for "Firm 1, Green; new, 2008" there are no data entered for subsample 3 under the heading "Lead content (%)." Also in Table 1, there appears to be far more variation for the "Wipe Sampling Result (microgram)" than in the "Lead content (%)".
- The CPSC study was titled "CPSC Staff Analysis and Assessment of Synthetic Turf "Grass Blades"". However, another key concern regarding the safety of synthetic turf is the recycled tire rubber ("crumb rubber") used in the fields. It is my understanding that a number of chemicals in addition to lead have been found in the crumb rubber, including benzothiazole (a skin and eye irritant), butylated hydroxyanisole (a carcinogen), n-hexadecane (a severe irritant), 4-(t-octyl) phenol (an irritant), phthalates (endocrine and reproductive toxicant, suspected developmental toxicant), and other chemicals.
- The CPSC press release acknowledged that "staff recognizes that some conditions such as age, weathering, exposure to sunlight, and wear and tear might change the amount of lead that could be released from the turf. As turf is used during athletics or play and exposed over time to sunlight, heat and other weather conditions, the surface of the turf may start to become worn and small particles of the lead-containing synthetic grass fibers might be released." According to the report, the oldest field tested (installed in 1999) was associated with the highest estimated daily ingestion of lead. It is important to determine whether this result is due to aging of the field, differences in the way turf fields were manufactured between the older and newer samples, or other reasons.
- The potential health effects of the chemicals in synthetic turf must also be weighed along with other potential health risks, such as the risk of an overheated playing field and increased risk of methicillin-resistant *Staphylococcus aureus* (MRSA) infections.

Clearly, additional study is needed before synthetic turf fields can definitively be declared safe. Parents, schools, parks and recreation departments, and others need

accurate answers about the safety and health effects of these fields to make the best possible decisions about where children and others are playing. The severe effects of both childhood and adult obesity on the health of Americans only increase the need for timely, trustworthy information on the health effects of synthetic turf.

Thank you for continuing to examine this urgent issue. Please call me with any questions or concerns, and I look forward to hearing from you.

Sincerely,

A handwritten signature in black ink that reads "Rosa L. DeLauro". The signature is written in a cursive style with a large, looping initial "R".

Rosa L. DeLauro
Member of Congress

Cc: James B. Gulliford, Assistant Administrator