

**From:** Kathy Michels

**Sent:** Wednesday, September 30, 2009 12:53 PM

**To:** Mike Riley [Mike.Riley@mncppc-mc.org], Maryland National Capital Parks & Planning Commission

**Cc:** Anne Ambler; Kathy Michels

**Subject:** Fwd: CPSC synthetic turf study Flawed and dangerously deceptive -according to Congresswoman Delauro and CT Attny General Blumenthal who urges Its Removal And Revision

Dear Mike,

I thought you'd better know the real scoop behind the CPSC study which you like to refer to and might be called on. This CPSC "study" from 2008 which the artificial turf industry likes to refer to as proving the "safety" of artificial turf, did nothing of the kind. Its headline "OK to Install, OK to Play On" was not warranted by the extremely limited sampling from a few fields for one toxin (lead) with questionable methods. Remember when anyone says "the CPSC found it is safe" -no expert has supported or validated it or the conclusions, while other experts, government agencies and representatives found the study "seriously flawed" and "dangerously deceptive". (Bolding in the letters is mine).

Note - the CPSC NEVER followed up to redo remove or revise as requested.

1) In Representative Rosa DeLauro's words:

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.**

2) And AG Blumenthal said among other things: **"the CPSC's claims — based on such a "crudely cursory study" — may dangerously deceive municipal and state leaders nationwide about the safety of synthetic turf."**

Begin forwarded message:

**Subject: REMINDER: CPSC synthetic turf study Flawed and dangerously deceptive -according to Congresswoman Delauro and CT Attny General Blumenthal who urges Its Removal And Revision**

<http://www.ct.gov/ag/cwp/view.asp?Q=421480&A=2795>

**Attorney General Calls Synthetic Turf Study Dangerously Deceptive, Urges Its Removal And Revision**

August 20th, 2008

August 19, 2008

original post: <http://www.ct.gov/ag/cwp/view.asp?Q=421480&A=2795>

**Attorney General Richard Blumenthal today called on the Consumer Product Safety Commission (CPSC) to immediately remove and revise a report on its website that may dangerously and deceptively mislead citizens into believing that artificial turf has been proven safe. Blumenthal said the CPSC relied on a grossly inadequate and badly flawed study in declaring synthetic turf safe to install and play on — focusing narrowly and insufficiently on lead, while failing to examine several other possible chemicals and concerns.**

In a letter to CPSC Acting Chairman Nancy Ann Nord, Blumenthal said the CPSC's claims — based on such a "crudely cursory study" — may dangerously deceive municipal and state leaders nationwide about the safety of synthetic turf.

**For the sake of public health and safety, Blumenthal said the CPSC has a moral and possibly legal obligation to immediately remove and revise its synthetic turf report from its website.**

"This report and release are as deceptive as some of the advertising and marketing of consumer products prosecuted by the Federal Trade Commission and state attorneys general," Blumenthal said.

"There is a clear and present danger that municipal and state decision makers — as well as parents and citizens — will rely on this unconscionably deficient report. It is replete with unsound scientific methodology and conclusions, and unreliable findings. It may lead to unsupportable and unwise commitments by towns and cities or their boards of education to build or replace athletic fields.

"I have personally reached no conclusion on the safety or health issues concerning artificial turf, because no complete or comprehensive study has been done. This one, far from being complete or comprehensive, is profoundly misleading and misguided and may lead to bad policymaking. Timely corrective action — indeed immediate revision — is essential.

"The CPSC review of artificial turf safety focused entirely on the issue of lead contamination from artificial blades of grass. While this one issue is important, it is neither the sole nor the most significant issue. There is no indication that CPSC staff considered the transferability or emission — especially at high temperatures — of toxic chemicals from the crumb rubber used at the base of artificial turf. This crumb rubber is usually made from recycled tires, containing chemicals — including benthothiazole, butylated hydroxyanisole and phthalates — that may be toxic or carcinogenic under some circumstances.

"Similarly, there is no indication that CPSC considered other important risks, some presented or aggravated by very high temperatures in the summer sun, and exposure to serious infection caused by the more extensive skin burns and abrasions created by falls on this material. Further, while CPSC staff admits that aging, wear and exposure to sunlight may change the amounts of chemicals released, CPSC has not even attempted to study or quantify the effects of those changes on health and safety.

"Even as to the lead issue, the CPSC study is seriously and reprehensibly flawed. The study

evaluated only 14 samples of artificial turf, even though thousands of these fields are in use. Worse, six samples were from portions of turf that was never installed or used, and one sample came from a field that was no longer in use. Thus, only half of the samples — or seven — were from turf in current use. The severely deficient scope of this fact finding eviscerates the credibility of CPSC's sweeping conclusions about thousands of artificial turf surfaces in daily use.

**“It is mystifying and mindboggling that an agency charged with protecting our children from unsafe products would declare artificial turf ‘OK to Install, OK to Play On’ without studying these critical health and safety threats.**

“Continued public dissemination of this misleading and deceptive material might well constitute a violation of our consumer protection laws if done by a company selling this product. The CPSC's distributing it — and vouching for its accuracy — constitutes a violation of its public trust.”

The Connecticut Department of Environmental Protection (DEP) — at Blumenthal's urging and with funding from a lawsuit settlement by his office — is beginning a study of artificial turf. Blumenthal recommended that the CPSC coordinate additional study with the DEP to ensure a thorough and prompt examination of synthetic turf.

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original post: <http://www.ct.gov/ag/cwp/view.asp?Q=421480&A=2795>

**Congresswoman DeLauro Takes CPSC to Task, “Artificial Turf Report Flawed”**

August 20th, 2008 Posted in Crumb Rubber Infill Alternative, Crumb Rubber Infill Studies, Crumb rubber toxins

FOR IMMEDIATE RELEASE Contact: Adriana Surfas

Friday, August 8, 2008 (202) 225-3661

DeLauro Takes CPSC to Task on Findings in Hastily Compiled and Flawed Report

Washington , D.C. – Congresswoman Rosa L. DeLauro (CT-3) sent a letter to Nancy A. Nord, acting chairman of the Consumer Product Safety Commission, questioning the agency's recently issued report on lead in synthetic turf fields and pressing for a thorough investigation. While the agency declared the fields safe, its conclusions, which were issued so hastily that even the synthetic turf industry was surprised at how quickly they were compiled, appear to be based on flawed methodology and less than sound science.

“It is my understanding that the methodology used in the CPSC study may have been flawed. As such, the report's conclusion may have been premature, providing less than adequate rationale to conclude that children are safe from exposure to lead when playing on these fields, or that the fields are safe overall, given the numerous other chemicals that may be found in synthetic turf and the crumb rubber of which it is largely composed,” DeLauro writes in the letter.

“Clearly, additional study is needed before synthetic turf fields can definitively be declared safe.”

Below is the text of the letter.

August 7, 2008

Nancy A. Nord, Acting Chairman  
Consumer Product Safety Commission  
U.S. Consumer Product Safety Commission  
4330 East West Highway  
Bethesda , MD 20814

Dear Chairman Nord:

I am writing to express my deep concerns about the report on lead in synthetic turf fields recently issued by the Consumer Product Safety Commission (CPSC). It is my understanding that the methodology used in the CPSC study may have been flawed. As such, the report's conclusion may have been premature, providing less than adequate rationale to conclude that children are safe from exposure to lead when playing on these fields, or that the fields are safe overall, given the numerous other chemicals that may be found in synthetic turf and the crumb rubber of which it is largely composed.

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 (%)". Are there scientific justifications for these data gaps and variability?

- 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.

For these reasons, **I believe that the study did not adequately support the title of the CPSC press release of July 30, 2008: “CPSC Staff Finds Synthetic Turf Fields OK to Install, OK to Play On.” Given the numerous unresolved issues relating to the health and safety of synthetic turf, and the limitations described in CPSC’s own study, the CPSC should have proceeded with more caution before issuing the message that synthetic turf fields are “OK to Install, OK to Play On.” I would appreciate a response from you as to how CPSC decided to issue this message despite the limitations of the synthetic turf study and the fact that synthetic turf may pose a number of health risks in addition to lead exposure.**

Chairman Nord, I am sure you would agree that it is the responsibility of the CPSC to conduct trustworthy studies and provide accurate information on product safety to the American public. 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. Given the severe effects of both childhood and adult obesity on the health of Americans, the need for timely, trustworthy information on synthetic turf is especially important. I urge CPSC to continue to look into all the potential health effects of synthetic turf fields. I also understand that CPSC is asking that voluntary standards be developed for synthetic turf, and I would urge that potential toxins in addition to lead be included in these standards.

Thank you for your attention to this important health matter. Please contact me with any questions or concerns, and I look forward to hearing from you.

Sincerely,

Rosa L. DeLauro  
Member of Congress  
Cc: Commissioner Thomas Moore  
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<http://www.house.gov/delauro>