



Public Employees for Environmental Responsibility

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ECOLOGYCENTER

Healthy People, Healthy Planet

Public Employees for Environmental Responsibility

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The Ecology Center

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Ann Arbor, MI 48104

October 24, 2019

Information Quality Guidelines Staff

(Mail Code 2811R)

US EPA1200 Pennsylvania Ave.,

NW Washington, DC 20460

Re: **Addendum to Data Quality Complaint** under the Information Quality Act for Part 1 of Synthetic Turf Tire Crumb Rubber Research Report.

To Whom It May Concern,

Please accept this addendum to our request for corrections to Synthetic Turf Field Recycled Tire Crumb Rubber Research Under the Federal Research Action Plan Final Report: Part 1 -Tire Crumb Characterization, US Environmental Protection Agency, Centers for Disease Control and Prevention/Agency for Toxic Substances and Disease Registry, 2019. In light of new information obtained by PEER and The Ecology Center as outline below, we request that EPA consider the constituents of the turf blades under the Federal Research Action Plan.

On August 6, 2019, Public Employees for Environmental Responsibility (PEER) and the Ecology Center submitted a Request for Correction under the Information Quality Act (IQA) of 2000 [Section 515 of the Fiscal Year 2001 Treasury and General Government Appropriations Act, Pub. L. No. 106-554], the Office of Management and Budget (OMB) Guidelines for Ensuring and Maximizing the Quality, Utility, and Integrity of Information disseminated by Federal Agencies, and the Environmental Protection Agency's (EPA) Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity of Information Disseminated by the Environmental Protection Agency.

On page 6 of our August 6, 2019 complaint, PEER and The Ecology Center stated:

The FRAP Fails to Consider Constituents Of The Carpet. EPA made the conscious decision to not test the synthetic turf carpet (the grass blades and backing). Specifically, the FRAP states, "Another design constraint was a decision to focus characterization research on the recycled tire crumb rubber infill and not to include other synthetic turf field materials (e.g., synthetic grass blades and backing material) due to the expanded scope that would be needed for a high-quality characterization of all these materials."... The grass blades and the backing may also be exposing athletes and children to a variety of toxic chemicals, and failing to examine the constituents of this material, EPA is rendering any conclusions about artificial turf as a whole incomplete.

Since that time, PEER and The Ecology Center have discovered that both the turf backing and blades contain PFAS. See, e.g., <https://www.peer.org/news/press-releases/toxic-forever-chemicals-infest-artificial-turf.html>. In addition, one synthetic turf manufacturer, Shaw Industries, stated:

Shaw is aware of a report of testing that reportedly shows the presence of fluorinated chemistry in turf products. We have not independently reviewed the testing, but these chemicals are *commonly used* by synthetic turf manufacturers as a non-stick agent in the manufacturing equipment...As new formulations are available to perform the same or similar functions as PFAS chemicals have historically, Shaw has shifted to new ingredients. We are exploring alternatives with our technical teams and suppliers but *have not yet identified a substitute that provides the non-stick properties required for manufacturing synthetic turf* (emphasis added).¹

This statement suggests that most, if not all, of the turf companies use PFAS in the manufacturing of synthetic turf, and indeed, that PFAS is “required.” Another turf manufacturer, ACTGlobal, states in their MSDS that they use a “fluorelastomer process aid” (see below):

¹ Personal communication (email, 10/9/19), Susan Farris, Vice President of Sustainability & Corporate Communications, Shaw Industries Group Inc., to David Abel, Boston Globe.

MATERIAL SAFETY DATA SHEET

FOR MN GLOBAL, FB GLOBAL

SYNTHETIC GRASS YARNS

(MSDS in accordance with 2001/58/EEC)

1. Substance /Preparation and company name

Company

Bonar Emirates Technical Yarns LLC
Plot # 01SR40 ICAD-3
Mustafa, P.O.Box.130219
Abu Dhabi U.A.E.
Tel: +971 2 69 60 807
E-Mail: www.bonaryarns.com

Company

Bonar Yarns & Fabrics Ltd
St Salvador Street
Dundee DD3 7EU
Scotland
United Kingdom
Tel: +44 (0)1382 346 100
Fax: +44 (0)1382 202 378
E-Mail: www.bonaryarns.com

2. Composition/information on ingredients

Chemical Nature

Linear low density polyethylene with an ethylene-olefin copolymer.
Masterbatch for the colouration of thermoplastics, free from heavy metal based pigments – containing a dispersion of organic and inorganic pigments and/or additives including U.V. stabilisers. Fluorelastomer process aid.
Lubricant containing a combination of polyglycole compounds and ester oils.

Finally, a recent scientific article suggests that hand-to-mouth and dermal contacts are a large exposure pathway for PFAS.²

Therefore, given that: 1) PFAS is used to manufacture the backing and grass blades of artificial turf; 2) the adverse health effects of PFAS are widely known; and 3) hand to mouth and dermal exposure is a significant pathway of PFAS into humans, it is incumbent on EPA to examine the risk that synthetic turf carpets have on both athletes and communities, as PFAS readily leaches off these fields into ground water and can potentially affect drinking water.

² Poothong, S., J. A. Padilla-Sánchez, E. Papadopoulou, G. Giovanoulis, C. Thomsen, and L. Småstuen Haug, Hand Wipes: A Useful Tool for Assessing Human Exposure to Poly- and Perfluoroalkyl Substances (PFASs) through Hand-to-Mouth and Dermal Contacts, *Environmental Science & Technology* **2019** 53 (4), 1985-1993.

Thank you for attention to this matter.

Sincerely,

Kyla Bennett, PhD, JD
Director of Science Policy
PEER

Jeff Gearhart, MS
Research Director
Ecology Center