



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

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Jeff Ruch, Executive Director
Public Employees for Environmental Responsibility
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2000 P Street, NW
Washington, DC 20036

OFFICE OF
CHILDREN'S HEALTH PROTECTION
AND ENVIRONMENTAL EDUCATION

Dear Mr Ruch,

Thank you for your letter of May 29, 2009, and for sharing your concerns with regard to protecting children against potential risks posed by the use of tire crumb on playgrounds. One of EPA's Administrator Lisa Jackson's top priorities is protection of children from harmful environmental exposures.

As noted on EPA's website devoted to scrap tires (<http://www.epa.gov/waste/consERVE/materials/tires/>), examples and benefits of using scrap tires include:

- Ground cover under playground equipment – possesses high impact attenuation/ability to absorb the energy from falling children and objects.
- Running track material – increases a track's resiliency and decreases stress on runners' legs.
- Sports and playing fields – as a soil additive, increases the resiliency of the field thereby decreasing injuries, improves drainage, and enables better grass root structure.

The "Ground Rubber Applications" section of our website also includes a link to a 2007 review of the potential health risks to children using outdoor playground and track surfaces constructed from recycled waste tires by California's Office of Environmental Health Hazard Assessment for the California Integrated Waste Management Board. This review found minimal risk but did note uncertainties in data and assumptions.

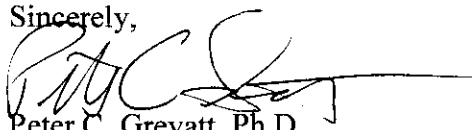
In response to possible concerns raised by one of our regional offices, EPA initiated a limited field study to assess the potential for exposures to constituents of potential health concern in playgrounds and synthetic turf athletic fields constructed with tire crumb. We hope to release the study results later this summer after they have been reviewed internally. The results will be used to make conclusions regarding the need for any additional field monitoring.

In addition, EPA's Region 2 hosted a technical workshop last August in New York City attended by numerous federal, state, and municipal agencies in the Mid-Atlantic and Northeast to share information on tire crumb in playgrounds. An exercise was conducted to identify contaminants of potential concern associated with both the synthetic turf and infill

material, and their respective exposure pathways of concern. A presentation by the Consumer Products Safety Commission provided results of their pilot study on lead exposure. They also shared their recommendations for risk minimization while further characterization takes place. Representatives from the workshop also agreed to serve in an *ad hoc* capacity to provide risk assessment services as more exposure data become available. Several states plan to conduct studies this summer. EPA will consider holding a follow-up workshop this autumn to share results and consider whether additional studies are needed and to coordinate next steps.

Thank you again for your interest in tire crumb and for your commitment to the protection of children's environmental health.

Sincerely,

A handwritten signature in black ink, appearing to read 'Peter C. Grevatt', with a long horizontal flourish extending to the right.

Peter C. Grevatt, Ph.D.

Senior Advisor for Children's Health