

Tsacoumis, Stephanie

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From: Tsacoumis, Stephanie  
Sent: 13 Nov 2014 22:49:17 +0000  
To: Levine, Jason; Kaye, Elliot; Hatlelid, Kristina; Ray, DeWane; Midgett, Jonathan; Richardson, Julia; Adkins, Patricia; Wolfson, Scott  
Cc: Boyle, Mary; Pollitzer, Patricia  
Subject: RE: artificial turf  
Attachments: Rubbercrumb children's product.pdf  
With thanks to the Pollitzer/Boyle brain trust, attached is an advisory opinion on the "children's product" point...

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**From:** Levine, Jason  
**Sent:** Thursday, November 13, 2014 5:27 PM  
**To:** Kaye, Elliot; Hatlelid, Kristina; Ray, DeWane; Midgett, Jonathan; Richardson, Julia; Adkins, Patricia; Tsacoumis, Stephanie; Wolfson, Scott  
**Subject:** artificial turf

This is NOT for release but I have been getting some calls – so can we confirm that I am correct in understanding where we are as of today on artificial turf?

In 2008, CPSC evaluated certain limited samples from synthetic athletic fields to examine the risk of young children being exposed to lead on synthetic fields. The exposure assessment did not include chemicals or other toxic metals beyond lead. Based on the limited sample size, and with a full recognition that some conditions such as age, weathering, exposure to sunlight, and wear and tear which could change the amount of lead released from turf, at that time the CPSC staff advised that young children did not appear to be at risk from lead exposure on these fields. It is important to note that the analysis and assessment in 2008 was of the synthetic grass turf blades and not what is often referred to as 'crumb rubber.' CPSC staff continues to recommend that children wash their hands after playing outside, include after using synthetic athletic fields. Since 2008, CPSC staff has continued to monitor this issue and was pleased to be able to attend meetings of the Environmental Protection Agency's Tire Crumb Science Workgroup in the past. If called upon, the Chairman is prepared to ask Dr. Kris Hatlelid, who is currently on detail to his office, to participate again if this group is revived. He has already provided her name as a point of contact to the Agency for Toxic Substances and Disease Registry (ATSDR) for this purpose.

(I know we put up a disclaimer on a press release – but I was combining that disclaimer and the 2008 release).

Additionally, the question has been raised as to whether synthetic turf fields would be considered a "children's product" under CPSIA. While this would clearly require a case-by-case analysis, generically speaking how would we think about this issue? It seems that the product that comes off the manufacturing line is intended for outdoor use by all ages – and it is the choice of the purchaser/installer as to whether it is being primarily intended for the use of children (under age 14). But perhaps if it is marketed specifically for use in a playground/elementary school that would change our analysis?

Again – this is just so I have some accurate internal reference points as these conversations take place – it is not for a written statement or letter at this time. (Though if I had to guess we will be seeing a congressional letter sooner rather than later.)

Thanks.

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