Subject: Fwd: Synthetic Turf as a children's product

Mr. Kumagai,

I wrote to you on October 30 about synthetic turf and have not received a response from you. Are you the appropriate person at the CPSC with whom I should voice my concerns? If not, can you please put me in touch with that person.

Thank you,

(b)(6)

Original Message:

From: (b)(6)
Date: Oct 30, 2012 1:54:53 PM
Subject: Synthetic Turf as a children's product
To: mkumagai@cpsc.gov, (b)(6)@montgomeycounty.md.gov, (b)(6)@verizon.net, (b)(6)@yahoo.com, (b)(6)@gannett.com, (b)(6)@gmail.com

Dear Mr. Kumagai,

As you can see from the following link to the web site, (b)(3):CP5A Section 6 synthetic turf is being marketed directly to parents as a children's product. They prey upon unfounded fears of natural grass, dirt and insects being harmful to children. They mention little hands and feet being susceptible to unseen objects in natural grass, etc.

There is no mention of the fact that crumb rubber pellets will stick to the skin of children, or that they will inhale carbon black and hydrocarbons while they play upon this surface. That ingestion of crumb rubber by toddlers (depicted on their web site) is an unintended consequence of using this surface at day care centers.

This pretty much says it all. The synthetic turf industry played the government for fools in seeking the classification that plastic rugs and tire crumb are not
children's products. You can clearly see from their web site that children lie directly in the crosshairs of their marketing efforts.

Since the CSPC made the determination that synthetic turf is not a children's product, the cut-off age for this classification being 12 years of age, how do you explain what is clearly a push to market syn turf to the parents of children younger than 12? I don’t see any children within the images on this web page that are close to 12 years of age.

I play soccer on synthetic turf. It is nasty. Dumbing down parents and educators to believe that the soil and grass with which humans evolved is somehow dangerous is criminal, but only if regulators take a stand and make decisions that protect the PUBLIC HEALTH.

Phthalates, plasticizers, fire retardants, 60+ complex compounds and carbon black all combined to bake under unrelenting solar radiation. How does anyone view this as a recipe for childhood exposure?

Please provide me with a thoughtful response and actions that can be taken to rein in child based marketing.

Respectfully,

(b)(6)

Original Message

From: (b)(6)
Date: Oct 30, 2012 1:31:50 AM
Subject: (b)(3):CPSA marketing directly as a children's product
To: (b)(6)

(b)(3):CP directly marketing for children right on its web site.
(b)(3):CPSA Section 6(b)

They don’t mention tire crumb by name but of course their “patented infill system” IS tire
For your consideration.

From: Judy Braiman [mailto:judybraiman@frontiernet.net]
Sent: Friday, May 01, 2009 9:22 AM
To: Wolfson, Scott
Subject: Fwd: RAMP Completed Results for 09-1375

Hi Scott,

These results are interesting. We tested old turf samples from Promounds, Inc. at 31 Dover Street, Brockton, MA 02301. They sell old used turfs from colleges and other places. These old pieces can be used anywhere you choose. You'll notice the results from Atlanta and DEL are high. We only tested three samples. But it indicates to us there may be a problem.

Regards,

Judy

Begin forwarded message:

From: "Kathryn Hansen" <khansen@paradigmenv.com>
Date: April 30, 2009 4:27:08 PM EDT
To: "Judy Braiman" <judybraiman@frontiernet.net>
Subject: RAMP Completed Results for 09-1375

Judy,

See attached analytical results for the above mentioned project.

Thank you and have a good day.
Lori,

Here is the information on the artificial turf in Oregon. I don't know the particulars on the field (age, type of material, etc).

John

John W. Boja, Ph.D., CPP
Compliance
U.S. Consumer Product Safety Commission
4330 East West Highway
Bethesda, MD 20814-4408
Phone 301-504-7300
Fax 301-504-0359

Ken,

The CPSC Western Regional Director suggested contacting CPSC Compliance Officer John Boja.

Phone: 301-504-7300
email: jboja@cpsc.gov

Joe Burchyski
CPSC-CFIW
(503) 632-1948

Joe, it's been a while since we talked. I assume you know there is some astroturf in Oregon, and we have some test data from a ballfield that we are concerned about. Do you know the persons who were responsible for the CPSC study and its conclusions? I am interested in contacting someone who was involved in that study and its conclusions.

The field in Salem has a total lead level of 4000, yet it appears to be releasing lead at a rate up to and exceeding 600 ug/swab sample. Based on the CPSC rationale, that is well above their assumed "safe" level.
I was concerned with the small scope of the CPSC study and the sweeping conclusions that it drew from it. This is one of the first fields we have evaluated in Oregon and it is considerably outside the scope of the CPSC study.

Kenneth W. Kauffman  
Environmental Health Specialist  
Environmental Toxicology Program  
Department of Human Services  
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Fax: 971-673-0457  
kenneth.w.kauffman@state.or.us
Mills, Alberta E.

From: danonica@comcast.net
Sent: Monday, June 16, 2008 5:51 PM
To: Boja, John
Cc: Rosemaron Rynn; Peter Vaghi; John Morrissey
Subject: RE: Artificial turf

Hello John:

Thank you for getting back to me and Dave did mention the process for follow up. I will keep in touch with you sometime in early August for any follow.

Regards,

Dan Barry
Little Flower

-------- Original message ----------
From: "Boja, John" <JBoja@cpsc.gov>
Hi Dan,

Thank you for allowing us access to your field for testing. I am not sure if Dave mentioned this to you or not, the CPSC is bound by a regulation that we must first report the results to the manufacturer and then afterwards they can be released to the public. So once I have the results from the lab, I will send them to the manufacturer, they have 30 days to review them. Once they approve of them or 30 day elapse, whichever is sooner, I can send you a copy.

Thank you again,

John W. Boja, Ph.D.
Compliance
U.S. Consumer Product Safety Commission
4330 East West Highway
Bethesda, MD 20814-4408
Phone 301-504-7300
Fax 301-504-0359

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From: Thron, Jonathan
Sent: Monday, June 16, 2008 7:12 AM
To: 'danonica@comcast.net'
Cc: Boja, John
Subject: RE: Artificial turf

Hi Dan,

Thanks for accommodating Dave last week for the turf tests, I appreciate it.

I'm forwarding your e-mail to my colleague, Dr. John Boja, who will be able to answer your question more accurately than I can.

Jonathan C. Thron
Compliance Officer
Marc,

Eric's out-of-office indicates that he's gone for a week, so who would be responsible for helping arrange for staff to do sample pick-ups or testing assistance?

Thanks,

Kris
301-504-7254

From: Hatleid, Kristina
Sent: Friday, April 25, 2008 10:05 AM
To: Ault, Eric; Schoem, Marc; Toro, Mary; Boja, John; Thron, Jonathan; Recht, Joel; Cobb, David
Cc: Saltzman, Lori; Osterhout, Cheryl; Aiken, Deborah; Zamula, William W.; OBrien, Craig
Subject: turf testing

Progress so far:

Glenn Pulliam of the NJ Department of Health and Senior Services gave me a couple of referrals for sites with lead-containing turf. He also confirmed that the Newark site is gone.

The College of New Jersey field that had been identified as lead-containing is currently being dismantled. I spoke with Brian Webb at the college and arranged for them to cut several square feet of the turf and hold it for us (3 samples of 3 ft by 3 ft). They are cutting up the surface today, but Brian indicated that storing the sample for a little while is not a problem. I told him someone would follow-up with him to coordinate picking up the sample. The site is in Ewing Township, near Trenton. Eric, can you arrange for the sample pick-up?

Brian Webb's contact info:
Office: 609-771-2281
Cell: 609-203-7490
E-mail: bwebb@tcnj.edu

I also have a call in to Joe Peluso, the Director of Environmental Services for the City of Hoboken, to talk about their park with lead-containing turf. Glenn Pulliam warned me, though, that the Hoboken people may not be helpful. Apparently, when the Hoboken mayor found out about the testing, he was a little peeved that the state did it and publicized the results without his approval. Anyway, I'm going to ask if we could visit the site, or get samples if they're also disposing of the product.

Depending on what I learn from Mr. Peluso, we might be able to coordinate visiting Hoboken and picking up the sample in Ewing Township.