Finally ……
a Government Investigation Into
Artificial Turf with Crumb Rubber Infill.

You have Until May 2nd to Submit Your Comment.

Tell the U.S. Environmental Protection Agency and the Centers for Disease Control and Prevention/Agency for Toxic Substances and Disease Registry (ATSDR), what you think of artificial turf, how you think they should go about collecting information for review, and what information you think is out there in the world that needs to be considered in their analysis.

How to submit: All submissions received must include the agency name (**ATSDR**) and Docket Number (ATSDR-2016-0002). You may submit comments, identified by **Docket No. ATSDR-2016-0002** by any of the following methods:

- **Online***:* Go to Regulation.gov and search for Docket No. "ATSDR-2016-0002" Follow the instructions for submitting comments.
- **Mail to:** Leroy A. Richardson, Information Collection Review Office, Centers for Disease Control and Prevention, 1600 Clifton Road NE., MS-D74, Atlanta, Georgia 30329.

The Delaware Riverkeeper Network is working on our comments, when we have completed them we will post them at:
http://www.delawareriverkeeper.org/ongoing-issues/artificial-turf

Meanwhile you can find more information about the environmental and health affects of crumb rubber turf at this link as well:
http://www.delawareriverkeeper.org/ongoing-issues/artificial-turf

More Information On What is Happening and Why:
Public concern and pressure over the health and environmental risks associated with artificial turf have been mounting—while policy makers point to the lack of comprehensive studies on exposure to crumb rubber as a hurdle to action. On January 22, 2016 Senator Blumenthal and Senator Nelson

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wrote a letter urging President Obama to initiate a multi-agency health study on artificial turf—citing disturbing reports of cancer cases associated with significant time playing on crumb rubber infill synthetic turf.

On February 12, 2016, in response to public concern, the Obama administration launched a multi-agency action plan to study the potential health risks associated with synthetic turf athletic fields and playgrounds. The U.S. Environmental Protection Agency (EPA), the Centers for Disease Control and Prevention/Agency for Toxic Substances and Disease Registry (ATSDR), and the Consumer Product Safety Commission (CPSC) will work collaboratively on the **Federal Research Action Plan on Recycled Tire Crumb Used on Playing Fields and Playgrounds.**

As part of the first steps, ATSDR has invited the general public to comment on the proposed collection of information related to synthetic turf fields with crumb rubber infill. The purpose of the proposed studies is to "evaluate and characterize the chemical composition and use of synthetic turf with crumb rubber infill and exposure potential to constituents in crumb rubber infill." The proposed collection of data includes outreach to key stakeholders, such as athletes and parents, in order to fill important data and knowledge gaps, characterize constituents of recycled tire crumb, and identify ways in which people may be exposed to tire crumb based on their activities on the fields.

You can review the proposed project in greater detail and provide your comments here: https://www.regulations.gov/#!documentDetail;D=ATSDR-2016-0002-0003

What: Submit your comments to the Agency for Toxic Substances and Disease Registry (ATSDR) on the nature and content of the proposed collection of information relating to the potential environmental health risks associated with synthetic turf athletic fields and playgrounds made of crumb rubber.

Deadline: May 2, 2015 at 11:59 pm

How to submit: All submissions received must include the agency name (**ATSDR**) and Docket Number (ATSDR-2016-0002). You may submit comments, identified by **Docket No. ATSDR-2016-0002** by any of the following methods:

- **Online***:* Go to Regulation.gov and search for Docket No. "ATSDR-2016-0002*"* Follow the instructions for submitting comments.
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From the Public Notice:

Proposed Project
Collections Related to Synthetic Turf Fields with Crumb Rubber Infill—New—Agency for Toxic Substances and Disease Registry (ATSDR).

Background and Brief Description
Currently in the United States, there are more than 12,000 synthetic turf fields in use. While the Synthetic Turf Council has set guidelines for the content of crumb rubber used as infill in synthetic

turf fields, manufacturing processes result in differences among types of crumb rubber. Additionally, the chemical composition may vary highly between different processes and source materials and may vary even within granules from the same origin.

Due to the limited information, the Agency for Toxic Substances and Disease Registry (ATSDR) and the United States Environmental Protection Agency (USEPA) propose to conduct two studies to investigate the chemical composition and use of crumb rubber infill in synthetic turf and the potential for exposure to environmental constituents that may result from contact with crumb rubber infill.

Prior to study initiation, outreach and engagement efforts may be undertaken among stakeholders, including but not limited to industry representatives, state or local partners, and sports coaches. These efforts will inform the design and implementation of the proposed studies and will involve less than ten respondents per stakeholder groups. The outreach and engagement efforts will allow us to better understand the manufacturing process for synthetic turf and crumb rubber infill and allow us to obtain first-hand perspectives on activities conducted on synthetic turf leading to potential exposures. Additionally, outreach efforts will involve discussions and coordination with state partners to identify their current and future research studies on synthetic turf.

The first study, titled "Determination of Field Operating Procedures, Use Conditions, and Chemical Composition of Crumb Rubber Infill in Synthetic Turf Fields," will characterize field use procedures and conditions. The respondents will include facility representatives who are knowledgeable about the standard operating procedures for synthetic turf fields with crumb rubber infill. We aim to enroll an estimate of ten facilities in each of the four US census regions. The questionnaire will focus on key questions to characterize activity use patterns, field maintenance (*e.g.,* redistribution of crumb rubber material), and other procedures and facility characteristics potentially affecting exposure to any chemicals of potential concern. Also, these facilities may be asked to supply samples from their synthetic turf fields with crumb rubber infill. The samples will be used to characterize the chemical constituents of the crumb rubber infill, including semi-volatile organic compounds (SVOC), metal content, and measurements of volatile organic compounds (VOC) and SVOC emission levels.

The second study, titled "Characterization of Exposure Potential during Activities Conducted on Synthetic Turf with Crumb Rubber Infill," will be the first assessment of activities conducted on synthetic turf for the purpose of characterizing potential exposure patterns. The study will include persons who use synthetic turf with crumb rubber infill (*e.g.,* facility users) and who routinely perform activities that would result in a high level of contact to crumb rubber. This will allow for evaluation of potential high-end exposures to constituents in synthetic turf among this group of users. The respondents will be administered a detailed questionnaire on activity patterns on synthetic turf with crumb rubber infill. This instrument, along with extant videography of persons engaged in activities of interest, will be used to characterize exposure scenarios, including the nature and duration of potential exposures.

Furthermore, if time and resources allow, we will conduct a full exposure characterization sub-study among a subset of the respondents. If possible, we will use the facilities sampled in the first study to conduct activities for the full exposure characterization of facility users. The exposure characterization sub-study will likely include but is not limited to field environment and material sampling, personal air monitoring, dermal sampling, and urine collection. It is likely that some of the collection items will not be analyzed in the current project time frame but will be archived for future analysis.