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To: office@syntheticturfcouncil.org
Subject: Informational Update: EPA Response to PEER Demand to Rescind the Published Results of its 2009 Study
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To All STC Members – NOT FOR DISTRIBUTION OUTSIDE THE COUNCIL

Perhaps you noticed during Christmas week the limited media coverage of the EPA's response to a demand filed March 21, 2013 by the Public Employees for Environmental Responsibility (PEER) "that the EPA rescind and correct online print information regarding the safety of artificial turf in its 2009 study *Scoping-Level Field Monitoring Study of Synthetic Turf Fields and Playgrounds* on the basis that it contains inaccurate, incomplete, and unreliable information."

In its public response to PEER dated December 16, the EPA stated that the 2009 study was "outdated", but that the "EPA believes the study report [published in November 2009] articulates the study purpose and limitations and provides objective summaries of the study results," which were that, "on average, concentrations of components monitored in this study were below levels of concern." Regrettably, the EPA updated its website on crumb rubber by clarifying the limited nature AND the reliability of its study, but included without comment, based on a literature review, a laundry list of compounds and materials found in some tires. PEER characterized the EPA statement as a retraction, and the media similarly exaggerated the significance of the EPA's weak response.

If you are asked about the EPA's statement, you should note that:

- The EPA did not in any way retreat from the conclusions it reached in its 2009 study, which completely validated the human health and environmental safety of crumb rubber infilled synthetic turf;
- There have been several important independent studies published since the EPA's study that also validate the human health and environmental safety of crumb rubber infilled synthetic turf. Links to the full studies are posted on the STC website under Resource Center/Independent Research, including studies by:
 - University of California, Berkeley, February 2010
 - The Connecticut Agricultural Experiment Station, Connecticut Department of Public Health, and the Connecticut Department of Environmental Protection, July 2010
 - California Office of Environmental Health Hazard Assessment and Cal/EPA, October 2010
 - Chemrisk, an independent environmental firm, for Rubber Manufacturers Association. A thorough review of studies from advocates and opponents of the use of recycled tire materials, August 2013

We have reported in the past on PEER's efforts to impose stringent guidelines on synthetic turf and crumb rubber. PEER tried unsuccessfully in 2012 to get the CPSC to issue guidelines requiring field owners to monitor hourly their field temperature, and to classify crumb rubber as a "children's product", as defined by the Consumer Product Safety Improvement Act of 2008, which would have imposed onerous testing and other requirements. They got shot down on both counts.

Unless this "story" gains more traction in the media, the STC does not intend to issue a statement.
Cheers, Rick

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