

**LOG OF MEETING**

**U.S. CONSUMER PRODUCT SAFETY COMMISSION  
OFFICE OF COMMISSIONER THOMAS H. MOORE**

8/16/08  
LETTER  
FOR THE RECORD ADMIN. DIV.  
WITH [unclear] REMOVE

**SUBJECT:** Meeting on Artificial Turf Products

**DATE OF MEETING:** May 12, 2008

**PLACE:** Conference room in suite 725, CPSC headquarters

**LOG ENTRY SOURCE:** Michael Gougisha

**DATE OF ENTRY:** May 27, 2008

**COMMISSION ATTENDEES:** Commissioner Thomas H. Moore; Michael Gougisha, Counselor to Commissioner Thomas H. Moore

**NON-COMMISSION ATTENDEES:** Rick Doyle - President, Synthetic Turf Council; Stanley H. Greene - President & CEO, Sprinturf; David Highfield, Center of Environment Health; Walter A. Sanders, Van Fleet Associates, Inc.; John J. Amato - President, JJA Sports; Joseph E. Motz - Chairman, Synthetic Turf Council; Kathleen Smith - Director U.S. Operations, United States Sports Surfacing Laboratory, Inc.; Phil M. Stricklen - Director Research & Development, Sportexe

**SUMMARY OF MEETING:** After initial greetings and introductions, Walt Sanders began the meeting by stating the purpose of the meeting was to correct any misperceptions about synthetic turf that might be resultant from recent lead testing of artificial turf fields in New Jersey. Joseph Motz then talked about the commitment of the Synthetic Turf Council to work with the Commission staff in developing a strategy for addressing any health concerns raised by lead levels in synthetic turf.

Rick Doyle then spoke about lead chromate, used in pigments as an agent to improve colorfastness, was the source of lead in synthetic turf. He indicated that lead chromate as used in synthetic turf was encapsulated, insoluble and had extremely low bioavailability.

Michael Gougisha asked whether synthetic turf as used in artificial turf sports fields would be considered a children's product as defined by either U. S. Senate or House passed legislation. Walter Sander indicated that it wouldn't and Rick Doyle indicated that the group would be addressing that issue in future Capitol Hill meetings.

Commissioner Moore indicated that the children's product issue was important because as contemplated in legislation passed by both Chambers, in general, children's products which contain lead above certain levels would be banned regardless to lead accessibility. Commissioner

**Moore also indicated that it is his position that children's products should not contain lead.**

**The group then shared with Commissioner Moore its briefing paper which is attached to this meeting log.**

**Commissioner Moore then thanked the group for providing their information and encouraged them to continue working with the Commission's staff.**



400 Galleria Parkway, Suite 1500  
Atlanta, GA 30339  
ph: 678.385.6720 | fax: 678.385.6501  
[www.syntheticurfCouncil.org](http://www.syntheticurfCouncil.org)  
Rick Doyle, President

## SYNTHETIC TURF – BRIEFING PAPER

### Who We Are

The Synthetic Turf Council is a non-profit association dedicated to serving as a resource for trustworthy information about synthetic turf. Our objective is to encourage, promote and facilitate better understanding among all parties involved in the manufacture, selection, delivery and use of today's synthetic turf systems. To that end, we make every attempt to dispense information that is neutral, objective and validated by independent, current and credible research.

### Our Commitment

The Synthetic Turf Council is committed to protecting the health and safety of the public. Because currently there is no standard for synthetic turf, the synthetic turf industry is looking forward to working with the U.S. Consumer Product Safety Commission to develop a workable and reasonable standard and phase-in period for lead chromate in the formulation used to make synthetic turf; as well as clear and objective Terminology to describe acceptable or undetectable levels of lead chromate in synthetic turf, e.g., “lead-free” as used to describe lead-free gasoline.

### The Issue

Recent testing of artificial turf fields in New Jersey and other states have raised public concern that the materials used to make synthetic turf may contain levels of lead that could pose a threat to public health, resulting in some field closures. EPA and the CPSC have begun formal testing procedures to determine whether, in fact, a threat exists.

### The Facts

In over 40 years, there has been no evidence or science to suggest that synthetic turf poses a risk to human health or the environment.

- **Lead Chromate in Synthetic Turf is Not a Health Hazard.** Recent disclosures by the N. J. Department of Health and Senior Services that 3 synthetic turf sports fields tested with elevated levels of lead resulted in a warning about lead levels in synthetic turf. It is an ingredient in pigments used to color and improve colorfastness in many consumer products like synthetic turf. Over 90% of synthetic turf fibers contain pigments with very low or undetectable levels of lead chromate. Industry is testing pigment formulations to continue to reduce lead chromate levels for all our colors without compromising performance. We are working to make what is already safe, safer.
- **Lead chromate is almost completely insoluble.** It is encapsulated in glass and resin, and diluted so that it has extremely low bioavailability. It is not absorbed by the body if ingested or inhaled. It does not leach into the environment;
- **Extremely Low Bioavailability of Lead Chromate.** The Center for Disease Control's Lead Prevention Program (1997-2006) identified no risks from synthetic turf during its investigation of 763,216 childhood exposures to lead. Of the nearly 40,000 cases of high blood lead concentrations in children reported in 2006, none were attributed to exposure to synthetic turf.

(over)

- **Scientists Support Synthetic Turf Has Few Health Risks.**

-- “There is no scientific evidence of a health risk for children or adults based on recent test results and current knowledge of the chemical structure of aged synthetic turf products,” concluded Davis Lee, Ph.D., synthetic organic chemistry, and David Black, Ph.D., forensic toxicology, April 21, 2008. Drs. Lee and Black calculated that a 50-lb. child would have to ingest an over 10 square feet of synthetic turf to receive 90 ppm of lead, the U.S. toy industry’s voluntary standard for migratory lead.

-- Dr. Eddy Bresnitz, Deputy Commissioner and State Epidemiologist, NJDHSS, said, “Available evidence suggests that there is no acute health risks due to use of artificial turf fields, and risks due to chronic and repeated exposure are unlikely.” The three NJ fields tested negative for lead in the air above them, and the soil below them. The blood lead levels of over 70 children who regularly played on one of the fields tested at or below the national average.

- **New Research is underway to ensure the product is safe.** New pigment formulations are being developed to continue to reduce lead chromate levels for all of our colors without compromising performance required by buyers.

### **Action Plan**

The Council is committed to protecting the health and safety of the public. Because currently there is no standard for synthetic turf, the synthetic turf industry is looking forward to working with the U.S. Consumer Product Safety Commission and U.S. Environmental Protection Agency (EPA) to develop:

- A workable and reasonable standard and phase-in period for lead chromate in the formulation used to make synthetic turf;
- Clear and objective Terminology to describe acceptable or undetectable levels of lead chromate in synthetic turf, e.g., “lead-free” as used to describe lead-free gasoline.
- A workable means of mitigating any potential threat to public health posed by synthetic turf.

### **Synthetic Turf Benefits**

- Provides a safe uniform all-weather playing low maintenance surface that can be used year-round. A grass sports field is often overused out of necessity, creating an unsafe playing surface. Increasingly, synthetic turf sports fields are the option of choice for high schools, colleges, professional sports teams, Parks & Recreation Departments, and townships and municipalities;
- Eliminates the need for 50,000 gallons of water each week during growing season and thousands of pounds of pesticides, herbicides, and fertilizers annually for every grass sports field;
- Recycles 25 million used auto tires annually that would otherwise end up in U.S. landfills. The U.S. EPA encourages the use of ground tire rubber in playgrounds, sports and playing fields, and other common applications. At least one of our member companies (and other companies have applied) is an approved member of the U.S. EPA’s GreenScapes Program because of the significant environmental benefits of synthetic turf;

**The STC Position:** The STC believes that reliable scientific data should be the foundation of any discussion regarding synthetic turf’s safety and utility. After reviewing the available research from independent and credible third-party experts, we are confident that synthetic turf is safe to humans and the environment. The STC has posted to its website, [www.syntheticurfCouncil.org](http://www.syntheticurfCouncil.org), a collection of unfiltered studies, research summaries, chemical analyses, technical papers, and position statements.



400 Galleria Parkway, Suite 1500  
 Atlanta, Georgia 30339  
 678.385.6720 (t) 678.385.6501 (f)  
[rick@syntheticturfCouncil.org](mailto:rick@syntheticturfCouncil.org)  
[www.syntheticturfCouncil.org](http://www.syntheticturfCouncil.org)

TMV  
 RW

2007 - 2008  
**BOARD OF DIRECTORS**

**OFFICERS**

**JOE MOTZ**  
 Chairman  
 The Motz Group  
 Cincinnati, OH

**STEVE WHITE**  
 Vice Chairman  
 Challenger Industries  
 Dalton, GA

**JOHN AMATO**  
 Secretary  
 JJA Sports  
 Westford, MA

**DAVE ANDERSON**  
 Treasurer  
 D.A. Hogan & Associates  
 Seattle, WA

**JIM DOBMEIER**  
 Director-at-Large  
 A-Turf  
 Williamsville, NY

**TOM PEEPLES**  
 Immediate Past Chairman  
 Universal Textile Technologies  
 Dalton, GA

**DIRECTORS**

**LANNY BAILEY**  
 Controlled Products  
 Dalton, GA

**JOHN GIRAUD**  
 Target Technologies Int'l Inc.  
 Burnaby, British Columbia

**STANLEY GREENE**  
 Sprinturf  
 Wayne, PA

**JIM PETRUCELLI**  
 FieldTurf Tarkett  
 Montreal, Quebec

**ALASTAIR SCOTT**  
 Bonar Yarns & Fabrics  
 Dundee, Scotland

**SABRINA THOMAS**  
 Thomas Testing  
 Scotts, MI

**JOHN TIDWELL**  
 Turfstore.com  
 Calhoun, GA

**STAFF**

**RICK DOYLE**  
 President

**KELLYE DAVIDSON**  
 Administrative Director

May 15, 2008

The Honorable Thomas Moore  
 Commissioner  
 U.S. Consumer Product Safety Commission  
 4330 East West Highway  
 Bethesda, MD 20814

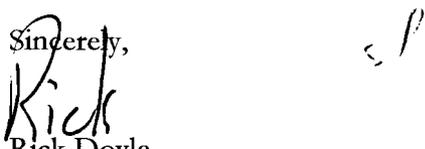
Dear Commissioner Moore:

On behalf of the Synthetic Turf Council, I want to express our appreciation to you and your able Counsel Michael Gougisha for taking time from your busy schedules to meet with us on Monday, May 12. Meeting with your office was a logical follow-up to our meeting with John Boja and other CPSC professional staff.

The meeting was constructive from a number of perspectives. First, it gave us the opportunity to provide you with a brief synopsis of our industry and the efforts to ensure that synthetic turf is safe and secure for children and adults alike. Second, it allowed us to understand your view about unacceptable lead levels. Finally, it triggered what we hope will be an ongoing dialog with your office on how we can best provide the CPSC staff with useful information about synthetic turf.

We are particularly appreciative of your admonition to ensure that our product does not become categorized as a "children's product" within the meaning of eventual conference agreement on H.R. 4040. We have taken your comments to heart and are in the process of communicating our concerns to members of the conference committee.

Again, we appreciate your time and concern with our industry.

Sincerely,  
  
 Rick Doyle  
 President

cc: Michael Gougisha, Counselor to Commissioner  
 Walt A. Sanders, Esq., Van Fleet Associates, Inc.



UNITED STATES  
CONSUMER PRODUCT SAFETY COMMISSION  
4330 EAST WEST HIGHWAY  
BETHESDA, MD 20814

May 28, 2008

Mr. Rick Doyle  
President, Synthetic Turf Council  
400 Galleria Parkway, Suite 1500  
Atlanta, Georgia 30339

Dear Mr. Doyle:

Thank you for your letter expressing appreciation for our meeting. I also appreciate you and your group coming in to educate my office on your efforts to work with CPSC's staff to ensure that synthetic turf is safe and secure for children and adults.

I do want to clarify that I did not admonish you to ensure that your product is not categorized as a "children's product". However, I did inform you that, as contemplated in legislation passed by both the U.S. Senate and U.S. House of Representatives, in general, children's products that contain lead exceeding a defined amount would be banned regardless to accessibility.

Thank you again for sharing the information about your group and your product with my office.

Sincerely,

A handwritten signature in black ink, appearing to read "Thomas H. Moore".

Thomas H. Moore