October 24, 2019

Information Quality Guidelines Staff  
(Mail Code 2811R)  
US EPA1200 Pennsylvania Ave.,  
NW Washington, DC 20460

Re: Addendum to Data Quality Complaint under the Information Quality Act for Part 1 of Synthetic Turf Tire Crumb Rubber Research Report.

To Whom It May Concern,


On August 6, 2019, Public Employees for Environmental Responsibility (PEER) and the Ecology Center submitted a Request for Correction under the Information Quality Act (IQA) of 2000 [Section 515 of the Fiscal Year 2001 Treasury and General Government Appropriations Act, Pub. L. No. 106-554], the Office of Management and Budget (OMB) Guidelines for Ensuring and Maximizing the Quality, Utility, and Integrity of Information disseminated by Federal Agencies, and the Environmental Protection Agency's (EPA) Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity of Information Disseminated by the Environmental Protection Agency.

On page 6 of our August 6, 2019 complaint, PEER and The Ecology Center stated:

**The FRAP Fails to Consider Constituents Of The Carpet.** EPA made the conscious decision to not test the synthetic turf carpet (the grass blades and backing). Specifically, the FRAP states, "Another design constraint was a decision to focus characterization research on the recycled tire crumb rubber infill and not to include other synthetic turf field materials (e.g., synthetic grass blades and backing material) due to the expanded scope that would be needed for a high-quality characterization of all these materials."… The grass blades and the backing may also be exposing athletes and children to a variety of toxic chemicals, and failing to examine the constituents of this material, EPA is rendering any conclusions about artificial turf as a whole incomplete.

Since that time, PEER and The Ecology Center have discovered that both the turf backing and blades contain PFAS. See, e.g., [https://www.peer.org/news/press-releases/toxic-forever-chemicals-infest-artificial-turf.html](https://www.peer.org/news/press-releases/toxic-forever-chemicals-infest-artificial-turf.html). In addition, one synthetic turf manufacturer, Shaw Industries, stated:

Shaw is aware of a report of testing that reportedly shows the presence of fluorinated chemistry in turf products. We have not independently reviewed the testing, but these chemicals are **commonly used** by synthetic turf manufacturers as a non-stick agent in the manufacturing equipment… As new formulations are available to perform the same or similar functions as PFAS chemicals have historically, Shaw has shifted to new ingredients. We are exploring alternatives with our technical teams and suppliers but **have not yet identified a substitute that provides the non-stick properties required for manufacturing synthetic turf** (emphasis added).

This statement suggests that most, if not all, of the turf companies use PFAS in the manufacturing of synthetic turf, and indeed, that PFAS is “required.” Another turf manufacturer, ACTGlobal, states in their MSDS that they use a “fluorelastomer process aid” (see below):

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1 Personal communication (email, 10/9/19), Susan Farris, Vice President of Sustainability & Corporate Communications, Shaw Industries Group Inc., to David Abel, Boston Globe.
Finally, a recent scientific article suggests that hand-to-mouth and dermal contacts are a large exposure pathway for PFAS.²

Therefore, given that: 1) PFAS is used to manufacture the backing and grass blades of artificial turf; 2) the adverse health effects of PFAS are widely known; and 3) hand to mouth and dermal exposure is a significant pathway of PFAS into humans, it is incumbent on EPA to examine the risk that synthetic turf carpets have on both athletes and communities, as PFAS readily leaches off these fields into ground water and can potentially affect drinking water.

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Thank you for attention to this matter.

Sincerely,

Kyla Bennett, PhD, JD
Director of Science Policy
PEER

Jeff Gearhart, MS
Research Director
Ecology Center