



Institute of  
Scrap Recycling  
Industries, Inc.

[www.isri.org](http://www.isri.org)

October 21, 2015

Administrator Gina McCarthy  
US Environmental Protection Agency  
1200 Pennsylvania Avenue, NW  
Washington, Dc 24060

Dear Administrator McCarthy:

Recently, there have been a number of confusing stories in the press regarding synthetic turf fields that utilize crumb rubber infill material and the concerns that some of these fields may expose players and the environment to harmful constituents.

Contrary to many of these ambiguous stories, there has been extensive research over the past 22 years and more than 75 independent, peer-reviewed studies focusing on the health effects of synthetic turf fields and playgrounds containing crumb rubber from recycled tires, and the fact is, these fields are safe. These studies have pointed to the conclusion there is no indication of negative health effects tied to crumb rubber's use in artificial turf.

Likewise, research by EPA in 2009 focusing on the safety of synthetic turf fields and playgrounds containing crumb rubber from recycled tires complemented an earlier 2008 CPSC study and statements on safety. EPA reported that the levels of particulate matter, metals, and volatile organic compound concentrations in wire sample above synthetic turf were similar to background levels and all concentrations of particulate matter, zinc, and lead were below levels of concern.

Similarly, according to the New York State Department of Health, based on the available information, chemical exposures from crumb rubber in synthetic turf do not pose a public health hazard. To put this in perspective, the US toxicity limits for children's toys are the lowest in the world in an effort to protect children at their earliest formative years. The exposure limits for synthetic turf fields consisting of crumb rubber are even lower.

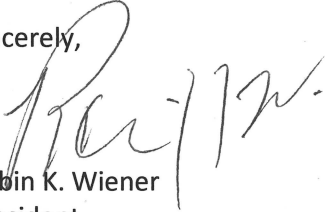
Tire recycling is also an economically sound and environmentally friendly activity. In the past, scrap tires were often dumped illegally in lakes, abandoned lots, along roadsides, and in sensitive habitats. Today, scrap tires are being recycled and play a much different role as a raw material feedstock used to manufacture new products, protect the environment, conserve natural resources, and save energy.

In 2014 alone, 103 million scrap tires were recycled in the U.S. used in the creation of new products such as rubberized asphalt, agricultural products, and synthetic turf. The use of recycled rubber in molded products provides a substantial carbon footprint advantage over the use of virgin plastic resins, having

between four and 20 times lower carbon footprint. Recycling versus disposing of scrap tires, frees up valuable space in landfills. Moreover, abandoned tire piles are a proven detriment to the environment and overall public health.

Recycling scrap tires into new innovative and safe products is an important economic and environmental success story that should be shared. Synthetic turf is one of those success stories. We respectfully ask EPA to respond to the concerned parents and the public at large highlighting the extensive research, including EPA's own studies, which establishes no connection between synthetic fields containing crumb rubber from recycled tires and public health hazards, including cancer.

Sincerely,

A handwritten signature in black ink, appearing to read "Robin K. Wiener". The signature is written in a cursive style with a large initial "R".

Robin K. Wiener  
President