

**To:** Megan Maguire, Office of Research and Development, US EPA RRB 41261  
maguire.megan@epa.gov

**From:** Environment and Human Health, Inc.

**Date:** January 9, 2014

**Subject:** Crumb rubber from used rubber tires and your claim that EPA's will not conduct research as to the safety of this product that is presently in children's playgrounds and synthetic fields.

Dear Megan Maguire,

**I find your response to Michael Blumenthal, the Vice President, Rubber Manufacturers Association absolutely shocking.**

First of all - how friendly you are with the people you are meant to be regulating. Your salutation, "Hi Michael" is a bit inappropriate - when he was looking to EPA to validate the safety of his tire-crumbs rubber.

Your comment to him, "**EPA has no plans for additional research in this area**" is **unbelievably shocking when we have toddlers all over this country playing on rubber tire mulch that we know contains multiple toxic chemicals. To name just a few of these chemicals see the list below.**

**1,3-butadiene:** a carcinogen, **Benzene:** Carcinogen, Developmental Toxicant, Reproductive Toxicant, **Phthalates:** Suspected Developmental Toxicant, Endocrine Toxicant, Reproductive Toxicant, **Polycyclic Aromatic Hydrocarbons (PAHs):** Suspected Cardiovascular or Blood Toxicant, Gastrointestinal or Liver Toxicant, Reproductive Toxicant, Respiratory Toxicant, **Manganese:** Neurological toxin, **Carbon Black:** Carcinogen, **Carbon Black, Nanoparticles:** Health effects unknown, **Latex:** Causes allergic reactions in some people, **Zinc** is the metal that is present at highest levels in tires. At high levels in the environment it becomes harmful to living organisms. The risk of leakage of zinc depends on the surrounding pH value, **Lead** may be present at low concentrations in tires. Lead is toxic to reproduction and could cause damage to the nervous system. Children, in particular, are sensitive, **Benzothiazole:** Skin and eye irritation, harmful if swallowed. There is no available data on cancer, mutagenic toxicity, teratogenic toxicity, or developmental toxicity **Butylated hydroxyanisole:** Recognized carcinogen, suspected endocrine toxicant, gastrointestinal toxicant, immunotoxicant (adverse effects on the immune system), neurotoxicant (adverse effects on the nervous system), skin and sense-organ toxicant. There is no available data on cancer, mutagenic toxicity, teratogenic toxicity, or developmental toxicity, **n-hexadecane:** Severe irritant based on human and animal studies. There is no available data on cancer, mutagenic toxicity, teratogenic toxicity, or developmental toxicity, **4-(t-octyl) phenol:** Corrosive and destructive to mucous membranes. There is no available data on cancer, mutagenic toxicity, teratogenic toxicity, or developmental toxicity.

**So how can the EPA have "no plans to research this issue further?"** This response shows a lack of scientific curiosity on the part of EPA and undermines its stated priority of reducing childhood chemical exposures.

**We can only hope that the EPA will change its mind and start to protect the children of this country. We will hope your superiors will have better judgement in this area than you have shown.**

Nancy Alderman, President  
Environment and Human Health, Inc.

Here is the EPA's response to Michael Blumenthal:

**Hi Michael-** Thanks for your interest in EPA's study "A Scoping-Level Field Monitoring Study of Synthetic Turf Fields and Playgrounds". Changes were made to the original study's web content on the EPA website and these updates were not adequately reflected in the original EPA press release. The EPA always strives to provide the most relevant information to the public, so the original press release was updated with a header directing the public to the most up-to-date information on the web. The web content for the study was changed to better reflect the study's objectives and results.

**EPA has no plans for additional research in this area.**

**Hope this helps answer your questions, please let me know if not.**

Thanks,

Megan

\*\*\*

Nancy Alderman, President  
Environment and Human Health, Inc.  
1191 Ridge Road  
North Haven, CT 06473  
(phone) 203-248-6582  
(Fax) 203-288-7571  
<http://www.ehhi.org>  
<http://ehhjournal.org>