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Re: Bill HB No. 5139 An Act Concerning The Use of Recycled Tire Rubber at Municipal and Public School Playgrounds.

Dear Honorable Members Of The Committee On Children

I am writing testimony in support HB No. 5139 as a step in protecting the young children of Connecticut from exposure to chemicals that can cause harm. While we all try to keep our children safe they are being involuntarily put in harms way while in our school and municipal playgrounds surfaced with recycled tire rubber. There is mounting evidence of the carcinogens and irritants that are in this material. Children are particularly vulnerable to the effects of toxins – children and toxic chemicals don't mix.

BUT YOUR PROPOSED BILL DOES NOT GO FAR ENOUGH. While your proposed bill calls for a ban on installation IT DOES NOTHING TO PROTECT CHILDREN WHO ARE CURRENTLY SUBJECT TO RISK AT PLAYGROUNDS ALL OVER CONNECTICUT THAT CURRENTLY HAVE RECYCLED TIRE RUBBER AS THE SURFACE.

As an example, in Guilford CT parents can not get shredded tires removed from the Cox Elementary school playground that has been exposing children to harm for 7 years, even though the parents are willing to raise the money for removal. Why? Because school and town officials don't want anyone to think there is a health problem as they try to get a second synthetic turf field installed at the high school.

THERE ARE TWO AMMENDMENTS THAT I THINK NEED TO BE ADDED TO THIS BILL:

1. AMMEND THE BILL TO ALSO BAN AND CALL FOR THE REMOVAL OF CRUMB RUBBER GROUND COVER THAT IS CURRENTLY ON THE SURFACE OF MUNICIPAL AND SCHOOL PLAYGROUNDS.

2 PLEASE NOTE THE SECOND AMMENDMENT TO CONSIDER CHANGING THE WORDING TO "SCHOOL" PLAYGROUNDS AND REMOVE THE WORD "PUBLIC." THE CURRENT PESTICIDE BAN AT SCHOOLS IS FOR BOTH PUBLIC AND PRIVATE SCHOOLS AND THIS BILL SHOULD PROTECT CHILDREN IN ANY PLAY GROUND IN CT.

If children fell ill and died at one of these playgrounds there would be a lot of press coverage, but as with pesticides, it can take 20 years from environmental exposure to diagnosis of disease.

It is interesting that people raise money and have 5K runs for the cure and not so much attention is focused on working on the causes. Having been in the health care field for 50 years, many of those years as a patient and family advocate I know first hand the suffering and sorrow there is when a child gets cancer.

There is a principle, called the Precautionary Principle, that basically says that once you are aware that something, like crumb rubber or pesticides, can potentially cause harm you should take action to protect from that harm. There is a duty to protect, even if you are not totally certain at that moment in time, you need to take precaution especially in light of the mounting evidence.

When I worked at the Medical School at Yale I was considered an expert on the legal and ethical issues related to research on human subjects. I reviewed hundreds of research proposals. I must say that if you came before our committee with an experiment to expose children in CT to toxins that could potentially cause harm it would not have been approved.

I would like to conclude by asking 2 questions for you to think about while contemplating a vote on this bill:

1. What kind of society do we live in where we give money to corporations that manufacture or install toxic materials that can put our youngest children in harms way?
2. Don't you have a moral obligation to our children and with all the work being done in epi-genetics to future generations to make sure you did all you could to ensure a toxic free legacy?

Thank you sincerely for your consideration and for all the work you do for our children,

Roberta Bender Silbert MPH

PASTED BELOW IS A STUDY DONE BY G. BENOIT A PROFESSOR AT YALE UNIVERSITY.

Findings of the chemical analysis conducted by Yale University of the crumb rubber tire infill used in synthetic turf and the rubber tire mulch used as surfacing material in toddler playgrounds

The shredded rubber tire playground mulch samples tested were provided by the manufacturer and were purchased in new bags of rubber mulch for use in gardens and playgrounds. The rubber tire infill for synthetic turf fields was obtained as new infill material from installers of synthetic

turf fields. There were 5 samples of infill from 5 different installers of fields and 9 different samples of rubber mulch taken from 9 different unopened bags of playground mulch.

RESULTS

There were 96 chemicals found in 14 samples analyzed. **Half of those chemicals had no government testing on them - so we have no idea whether they are safe or harmful to health.** Of those chemicals found that have had some government testing done on them these are the findings with their health effects.

12 CARCINOGENS

2-Mercaptobenzothiazole

Carcinogen, toxic to aquatic life

9,10-Dimethylanthracene

Carcinogen, respiratory irritant and can cause asthma

Bis(2-ethylhexyl) phthalate

Carcinogen, may cause damage to fetuses

Fluoranthene

Carcinogen, Fluoranthene is one of the US EPA's 16 priority pollutant, A Polycyclic Aromatic Hydrocarbon (PAH).

Heptadecan

Carcinogen

2-mercaptobenzothiazole

Carcinogen

Phenol, 4-(1,1,3,3-tetramethylbutyl)

Carcinogen

Phenanthrene

Carcinogen - A PAH

Phthalimide

Carcinogen, skin, eye and lung irritant. A Fungicide

Pyrene, 1-methyl

Carcinogen

Tetratriacontane

Carcinogen, eye and skin irritant. Can cause systemic damage to central nervous system.

Pyrene

Carcinogen, toxic to liver and Kidneys, a PAH

Carbon Black

Carcinogen

Carbon Black makes up to 20% to 30 % of every tire. It is used as a reinforcing filler. Carbon Black is listed as a carcinogen by the International Agency for Research on Cancer (IARC).

Carbon Black, as such, was not analyzed by the Yale Study because Carbon Black is made up of a number of chemicals - some of which were found in the Yale study. Carbon Black is not one chemical -- it is made up of many chemicals - often of petroleum products.

Furthermore, carbon black has no fixed composition, even of the many compounds it contains. Carbon black from different sources will have differing compositions. In our method, carbon black will register as a series of substances extracted from it. There is no carbon black molecule, it's a mixture.

20 IRRITANTS

1,4-Benzenediamine, N-(1,3-dimethylbutyl)-N'-phenyl-
Irritant - causes skin and eye irritation, toxic to aquatic life

1,4-Benzenediamine, N-(1-methylethyl)-N'-phenyl-
Irritant - causes skin and eye irritation, toxic to aquatic life

2(3H)-Benzothiazolone
Irritant - causes skin and lung irritation

2-Dodecen-1-yl(-)succinic anhydride
Irritant - causes eyes, skin and lungs irritation

3,5-di-tert-Butyl-4-hydroxybenzaldehyde
Irritant - causes irritation to eyes, skin and lungs.

Anthracene
Irritant - causes skin, eye and respiratory irritation. Breathing it can irritate the nose, throat and lungs causing coughing and wheezing.

Benzenamine, 4-octyl-N-(4-octylphenyl)-
Irritant - causes eye and skin irritation

Benzenesulfonamide
Considered hazardous, very little testing has been done on it.

Benzothiazole, 2-(methylthio)-
Irritant - causes Skin and eye irritation.

Dehydroabietic acid
Toxic to aquatic organisms

Docosane
Irritant - causes Skin irritation

Hexadecanoic acid, butyl ester
Irritant - causes eye, skin and lung irritant. Can cause reproductive effects.

Methyl stearate
Irritant - causes eye, skin and lung irritation.

Octadecane

Irritant - causes skin, eye and respiratory irritation

Octadecanoic acid also known as Stearic acid

Irritant - causes skin, eye and respiratory irritation

Oleic Acid

Irritant - causes skin and eye irritation

Phenol, 2,2'-methylenebis[6-(1,1-dimethylethyl)-4-ethyl-

Irritant - causes skin, eye and respiratory irritation

Tetradecanoic acid

Toxic to aquatic organisms. Skin and eye irritant.

Anthracene, 2-methyl

Acute aquatic toxicity, Not much data available - what there is shows it to be an eye, skin and lung irritant

Anthracene, 9-methyl

Acute aquatic toxicity, serious eye irritant