



GAIL FARBER, CHAIR  
MARGARET CLARK, VICE - CHAIR

LOS ANGELES COUNTY  
SOLID WASTE MANAGEMENT COMMITTEE/  
INTEGRATED WASTE MANAGEMENT TASK FORCE  
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March 11, 2015

The Honorable Bob Wieckowski, Chair  
Senate Environmental Quality Committee  
State Capitol, Room 2205  
Sacramento, CA 95814

Dear Senator Wieckowski:

**SENATE BILL 47 (INTRODUCED DECEMBER 17, 2014) – OPPOSE  
ENVIRONMENTAL HEALTH: SYNTHETIC TURF**

As indicated in the enclosed correspondence of March 5, 2015, the Los Angeles County Integrated Waste Management Task Force (Task Force) **opposes** Senate Bill 47 (SB 47) as introduced on December 17, 2014. The proposed legislation would require the Office of Environmental Health Hazard Assessment (OEHHA) in consultation with several other State agencies, to prepare and provide to the Legislature a study analyzing synthetic turf that contains recycled crumb rubber from waste tires for potential adverse health impacts. The bill would additionally prohibit a public or private school or local government, until January 1, 2018, from installing, or contracting for installation of, a new field or playground surface made of synthetic turf that contains recycled crumb rubber from waste tires within the boundaries of a public or private school or public recreational park.

Pursuant to Chapter 3.67 of the Los Angeles County Code and the California Integrated Waste Management Act of 1989 (Assembly Bill 939 [AB 939], as amended), the Task Force is responsible for coordinating the development of all major solid waste planning documents prepared for the County of Los Angeles and the 88 cities in Los Angeles County with a combined population in excess of ten million. Consistent with these responsibilities and to ensure a coordinated and cost-effective and environmentally sound solid waste management system in Los Angeles County, the Task Force also addresses issues impacting the system on a countywide basis. The Task Force membership includes representatives of the League of California Cities-Los Angeles County Division, County of Los Angeles Board of Supervisors, City of Los Angeles, the waste management industry, environmental groups, the public, and a number of other governmental agencies.

According to a memorandum from the County of Los Angeles Department of Public Health to the Los Angeles County Board of Supervisors, dated November 5, 2014, *“the U.S. Environmental Protection Agency (EPA) has studied the chemical content of crumb rubber, and state that concentrations of chemical in their study were below level of*

The Honorable Bob Wieckowski

March 11, 2015

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*concern. The EPA's study was limited, but it remains the most comprehensive study performed to date" (emphasis added).*

The Task Force agrees that the material ought to be further analyzed to determine if there is a health risk associated with the material; however, the Task Force cannot support a moratorium until such analysis is completed *and* determines that recycled crumb rubber poses a threat to human health. Moreover, a moratorium on usage of the material may prove detrimental to the recycled waste tire crumb rubber market. In addition to the manufacturers of the products, local jurisdictions throughout the State have waste tire recycling programs that may be affected by such a moratorium; therefore any action taken that would adversely affect this market should be based on scientific evidence.

Therefore, based on the foregoing, the Task Force **opposes** SB 47 and would welcome a legislative proposal which requires further testing of synthetic turf containing recycled crumb rubber from waste tires prior to establishing a moratorium on usage of the material.

If you have any questions, please contact Mr. Mike Mohajer of the Task Force at [MikeMohajer@yahoo.com](mailto:MikeMohajer@yahoo.com) or (909) 592-1147.

Sincerely,



Margaret Clark, Vice-Chair  
Los Angeles County Solid Waste Management Committee/  
Integrated Waste Management Task Force and  
Mayor Pro-Tem, City of Rosemead

GA:fr

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Enc.

cc: Senator Jerry Hill  
Each Member of the Senate Environmental Quality Committee  
California State Association of Counties  
League of California Cities, Los Angeles Division  
Each member of the Los Angeles County Board of Supervisors  
Los Angeles County Department of Public Health  
San Gabriel Valley Council of Governments  
South Bay Cities Council of Governments  
Gateway Cities Council of Governments  
Westside Cities Council of Governments  
Each City Mayor and City Manager in the County of Los Angeles  
Each Member of the Los Angeles County Integrated Waste Management Task Force

**From:** Mike Mohajer [<mailto:MikeMohajer@yahoo.com>]  
**Sent:** Thursday, March 05, 2015 11:33 PM  
**To:** [Senator.Wieckowski@sen.ca.gov](mailto:Senator.Wieckowski@sen.ca.gov); [Senator.Gaines@sen.ca.gov](mailto:Senator.Gaines@sen.ca.gov); [Senator.Bates@sen.ca.gov](mailto:Senator.Bates@sen.ca.gov);  
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**Subject:** OPPOSE - SENATE BILL SB 47 -- INTRODUCED DECEMBER 17, 2014



**TO:** Senator Bob Wieckowski, Chair  
Senate Environmental Quality Committee  
State Capitol, Room 2205  
Sacramento, CA 95814

**FROM:** Mike Mohajer, Member  
Los Angeles County Solid Waste Management Committee/Integrated  
Waste Management Task Force

**SUBJECT: OPPOSE – SENATE BILL 47 (HILL), INTRODUCED DECEMBER 17, 2014**

On behalf of the Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force (Task Force) this is to advise that on February 19, 2015, the Task Force voted to oppose Senate Bill (SB) 47 authored by Senator Jerry Hill. If enacted, SB 47 as introduced on December 17, 2014, would impose a moratorium on the installation, or contracting for the installation of a new field or playground surface made from synthetic turf within the boundaries of a public or private school or public recreation areas until January 1, 2018. This bill also requires the Office of Environmental Health Hazard Assessment by July 1, 2017, in consultation with CalRecycle, the Department of Public Health, and the Department of Toxic Substances Control, to prepare and provide to the Legislature a study to include analyzing synthetic turf for potential adverse health impacts. The study must also include a hazard analysis of individual, synergistic, and cumulative exposures to chemicals that may be found in synthetic turf.

The Task Force would like to commend Senator Hill and fully support his proposal to require the Office of Environmental Health Hazard Assessment to conduct the said comprehensive study. However; the Task Force is not aware of any scientific study that would substantiate a need to impose a prohibition on the use of crumb rubber in synthetic turf at this time. Further, according to a memorandum from the County of Los Angeles Department of Public Health to the Los Angeles County Board of Supervisors, dated November 5, 2014, *“the U.S. Environmental Protection Agency (EPA) has studied the chemical content of crumb rubber, and state that concentrations of chemical in their study were below level of concern. The EPA’s study was limited, but it remains the most comprehensive study performed to date”* (emphasis added).

Pursuant to Chapter 3.67 of the Los Angeles County Code and the California Integrated Waste Management Act of 1989 (Assembly Bill 939 [AB 939], as amended), the Task Force is responsible for coordinating the development of all major solid waste planning documents prepared for the County of Los Angeles and the 88 cities in Los Angeles County with a combined population in excess of ten million. Consistent with these responsibilities and to ensure a coordinated, cost-effective, and environmentally sound solid waste management system in Los Angeles County, the Task Force also addresses issues impacting the system on a Countywide basis. The Task Force membership includes representatives of the League of California Cities-Los Angeles County Division, County of Los Angeles Board of Supervisors, City of Los Angeles, the waste management industry, environmental groups, the public, and a number of other governmental agencies.

For the reasons indicated, the Task Force respectfully requests your nay vote on SB 47. We also respectfully request a nay vote from the other members of the Senate Environmental Committee.

Thank you for your consideration and please contact me should you have any questions at [MikeMohajer@yahoo.com](mailto:MikeMohajer@yahoo.com) or 909-592-1147.

CC: Senator Jerry Hill

Each member of the Senate EQ Committee

Staff to Senate EQ Committee (Rebecca Newhouse, Joanne Roy)

Each Member of the LA County SWMC/IWM Task Force



CYNTHIA A. HARDING, M.P.H.  
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November 5, 2014

TO: Each Supervisor

FROM: Cynthia A. Harding, M.P.H. *Cynthia A. Harding*  
Interim Director

SUBJECT: **CRUMB RUBBER IN ARTIFICIAL TURF (Board Agenda of October 21, 2014; Item 49-A)**

On October 21, 2014, your Board passed a motion to direct the Department of Public Health (DPH) to evaluate the health risks associated with artificial turf made from crumb rubber, and to provide a recommendation on its continued use in County parks.

Crumb rubber is recovered from used tires and utilized as a ground cover under certain playground equipment, running tracks, and athletic fields; and also as infill between artificial turf fibers to provide stability, uniformity, and resiliency. This material is currently in use in at least 4,500 fields and playgrounds throughout the United States.

Recent media reports have raised questions regarding the safety of crumb rubber in artificial turf, and a possible association with cancer. The U.S. Environmental Protection Agency (EPA) has studied the chemical content of crumb rubber, and states that the concentrations of chemicals in their study were below levels of concern. The EPA's study was limited, but it remains the most comprehensive study performed to date. The recent media reports suggested a link between lymphoma and athletic play on artificial turf. These purported links are not based on scientific or epidemiological studies. Future study by the EPA may be warranted to fully evaluate the health implications of exposure to crumb rubber; however, current scientific data does not indicate a concern for cancer.

At this time, DPH does not recommend warnings or restrictions for park-goers at Bassett Park, Col. Leon H. Washington Park, Lennox Park, or El Cariso Community Regional Park, all of which utilize artificial turf with crumb rubber. DPH will continue monitoring the scientific literature on this matter, and will report on any new findings to the Board as they occur.

If you have any questions or would like additional information, please let me know.

CAH/JDG/cr  
1410:009

c: Chief Executive Officer  
County Counsel  
Executive Officer, Board of Supervisors