

FOR INCLUSION IN PUBLIC COMMENTS MEETING MINUTES Baker Park Project 12/4/2024

Submitted by Heather Friedli

We all agree on the following:

- a. This is our community and we all together have the power and responsibility to make sure we are involved in keeping our community strong.
 - b. The health and safety of our kids is number one. For our kids and the next generation, we happen to have the responsibility to make sure we do the right thing right at this moment.
 - c. We all want to be able to keep sledding at the park as we always have. That's a community builder.
2. PFAS is bad for reproductive organs and causes cancer. The science is clear. We want to know that we are not adding to the PFAS problem for our kids.
 3. Our state of Minnesota has already recognized the science on PFAS. It is not in dispute.
 4. Minnesota now prohibits, after Jan 1 2025, the sale of products which involve intentionally added PFAS for a particular purpose — for example, to make the turf water resistant.
 5. Our city St Paul has a good contract that requires vendors to comply with all laws.
 6. In a situation like this, though, it is not enough to rely on the vendor to comply with the law or the contract.
 - a. All the law does is make the vendor liable if they violate it.
 - b. All the contract does is make the vendor liable if they violate it.
 - c. Neither of those outcomes actually protects our kids.
 - d. By the time someone discovers they have violated the PFAS laws and the contract, our kids will already have been exposed to the harms.
 - e. Who cares if someone sues the company by that point - the damage is done. And the company would probably be bankrupt by then anyway.
 7. Proposed next steps:
 - a. The City requires the vendor to provide transparent documentation of the manufacturing process to ensure now, before we buy any of this stuff, that it is in compliance with the PFAS laws.
 - b. The City requires the vendor to provide sample product, turf and infill, so we can ensure that the product itself is "safe" from a real-life perspective, not just a manufacturing-process perspective.

- c. We fight for an interpretation of the law that says PFAS is PFAS, and that there is no exception in the law for “trace element” of PFAS as admitted by the proposed manufacturer
 - d. After the city receives documentation from the vendor of the manufacturing process, they should ask for an interpretation from our lawyer — that the manufacturer admitting that PFAS is in the turf may amount to an admission that it is out of line with the law
8. We hold off the plans until all of that information comes back to the public.
9. At the same time, on a separate track, the City should provide to us all of the updated plans to make sure that the traditional community sledding is not encumbered by any of this sort of turf / field / field maintenance / drainage elements.

Published scientific articles about PFOS/PFAS concerning the health of players, the environment and synthetic turf

National Institute of Health

Health Impacts of Artificial Turf: Toxicity Studies, Challenges, and Future Directions

https://pmc.ncbi.nlm.nih.gov/articles/PMC10262297/?fbclid=IwY2xjawG9xdVleHRuA2FlbQIxMAABHcs8I4jYL7s7APtTPFeeB_s4Y8T3zGPWpFlulwU-ZyXdrNwA9S3-81sY7A_aem_wbv0conHpAuz1Llwn-3uFQ

Philadelphia Regional Center for Children’s Environmental Health

“There is no such thing as PFAS-free synthetic turf” PRCCEH co-director, Aimin Chen, PhD, MD

https://prcceb.upenn.edu/there-is-no-such-thing-as-pfas-free-synthetic-turf/?fbclid=IwY2xjawG9xaJleHRuA2FlbQIxMAABHQxteW6eke_JeW8F4B3t_MWewzGmd8dvGTDwrjRx-YUnUtvTNOvJsyQbTw_aem_RLIZgwiUDk-TPW-fL-eWyg

Mayo Clinic- 'Forever chemicals' found in thousands of household products may affect women's heart health

<https://newsnetwork.mayoclinic.org/n7-mcnn/7bcc9724adf7b803/uploads/2022/07/Script-MCM-Forever-chemicals.pdf>

The Guardian

Athletes likely to have higher levels of PFAS after play on artificial turf – study 2024

<https://www.theguardian.com/environment/2024/mar/15/athletes-higher-pfas-levels-artificial-turf>

-Here is reliable information with sources on Synthetic Turf and PFAS

<https://www.turi.org/publications/per-and-poly-fluoroalkyl-substances-pfas-in-artificial-turf-carpet/>

Keller M, Turco RF, Gray MB, Sigler V. The Fate of Methicillin-Resistant *Staphylococcus aureus* in a Synthetic Turf System. *Sports Health*. 2020;12(3):263-270. doi:10.1177/1941738120909353

<https://journals.sagepub.com/doi/10.1177/1941738120909353>

Elizabeth M. Begier, Kasia Frenette, Nancy L. Barrett, Pat Mshar, Susan Petit, Dave J. Boxrud, Kellie Watkins-Colwell, Sheila Wheeler, Elizabeth A. Cebelinski, Anita Glennen, Dao Nguyen, James L. Hadler, The Connecticut Bioterrorism Field Epidemiology Response Team, A High-Morbidity Outbreak of Methicillin-Resistant *Staphylococcus aureus* among Players on a College Football Team, Facilitated by Cosmetic Body Shaving and Turf Burns, *Clinical Infectious Diseases*, Volume 39, Issue 10, 15 November 2004, Pages 1446–1453, <https://doi.org/10.1086/425313>

Collections Related to Synthetic Turf Fields with Crumb Rubber Infill

https://www.epa.gov/sites/default/files/2016-08/documents/tcrs_research_protocol_final_08-05-2016.pdf

Mack CD, Hershman EB, Anderson RB, Coughlin MJ, McNitt AS, Sendor RR, Kent RW. Higher Rates of Lower Extremity Injury on Synthetic Turf Compared With Natural Turf Among National Football League Athletes: Epidemiologic Confirmation of a Biomechanical Hypothesis. *Am J Sports Med*. 2019 Jan;47(1):189-196. doi: 10.1177/0363546518808499. Epub 2018 Nov 19. PMID: 30452873.

In consideration of our rapid climate change and shift to hotter drier summers:

<https://plantscience.psu.edu/research/centers/ssrc/documents/temperature.pdf>

Mount Sinai Children's Environmental Health Center

<https://static1.squarespace.com/static/57fe8750d482e926d718f65a/t/593b15421e5b6c414467a03b/1497044293003/CEHC+Position+Statement+on+Recycled+Rubber+Turf+Surfaces+2017-5-10.pdf>

CPSC, EPA, & CDC on Artificial Turf Safety

https://static1.squarespace.com/static/57fe8750d482e926d718f65a/t/58ad8b671e5b6cc2969edb53/1487768424353/CPSC_EPA_Retractions.pdf

Martha's Vineyard Synthetic Fields Impact Study (Partial): Anticipated Geofill Contamination

<https://static1.squarespace.com/static/57fe8750d482e926d718f65a/t/58c1ce57bf629ab8badc29ea/1489096280183/SHPFC+MV+Geofill+Assessment+2-9-17.pdf>

Synthetic Turf and Heat Island effect:

<https://static1.squarespace.com/static/57fe8750d482e926d718f65a/t/581a1d652e69cfd82f811f7a/1478106469795/926.pdf>

Statement from FieldTurf admitting there is PFAS in their product according to their OWN testing

Results:

- Low levels of some PFAS compounds, below laboratory reporting limits, were identified in some FieldTurf products – but the specific PFAS compounds detected are not on the EPA's RCRA "Hazardous Constituent" list, and the levels reported are lower than even the most stringent EPA soil screening health guideline levels for PFAS compounds. As part of our rigorous testing process, one of our products was tested twice (called a "duplicate") to determine whether or not the results were reproducible (see Tables 3 and 4). This is a standard quality control practice for laboratory testing.
- Under the EPA's definition of PFAS compounds, the fluoropolymers used in some of FieldTurf synthetic turf products are likely considered to be PFAS. This is also true for any synthetic turf product made from or with fluoropolymers, regardless of manufacturer. However, the laboratory testing of FieldTurf products made with fluoropolymers (which are designed to resist degradation) found that little (if any) PFAS would leach from these types of materials over time – and this was only after the aggressive TOP assay process was used.
- Data validation of the laboratory results showed that in fact laboratory contamination, not the product samples, was the source of the majority of detections. The remaining detections are extremely low level (below the reporting limits in most cases) and non-reproducible, raising the question as to whether these low levels are actually related to the product or also laboratory errors.

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