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To Whom It May Concern:

The safety of our synthetic turf products is a priority for Shaw Sports Turf. All turf products are thoroughly tested before they are approved to be sold to the public. This testing not only includes physical and performance testing to show that the product will perform as desired for the athlete, but also testing is done to assure our products are safe from environmental and human health aspects.

A recent concern for synthetic turf has been the total lead content in the synthetic turf fibers. All of the fibers used by Shaw Sports Turf have been tested according to ASTM F 2765 and have shown total lead levels well below the 100 ppm requirement. Although synthetic turf is not classified by the CPSC as a children's product, the 100 ppm maximum level meets the most stringent requirement the CPSC has established for lead in products designed for children.

Other concerns focus on what can be extracted into the environment by rain water or heating of the turf surface. All components of Shaw Sports Turf products have been tested for the extraction of heavy metals and also for semi-volatile and volatile materials. Heavy metal extractions have been performed for the fibers using the DIN 18035-7 which is the environmental standard used for turf fibers installed in Europe . The fibers, backing materials, and infill materials have all been subjected to further testing using CAM 17 protocols for testing for heavy metals. The turf components have also been tested using the US EPA TCLP test for heavy metals, volatiles, and semi-volatile compounds. All of the results from the Shaw Sports Turf products have met the guidelines for the State of California and the EPA concerning heavy metals and volatile materials.

Copies of the third party test reports for the above testing will be provided upon request.

Sincerely,

Phil M. Stricklen, Ph.D Director of Sports Turf R&D



## **Lead Free Claims**

Lead is a naturally occurring element that is present in many materials mined from the earth. It has been used for centuries in application such as pewter, pipes, pigments, and storage batteries.

Lead compounds have been shown to cause neurological problems in humans. Lead based paints were removed from the market after it was shown that children could ingest toxic levels of lead by living and playing in houses with chipping lead based paint. Lead additives have also been removed from gasoline to reduce the introduction of lead into the environment.

The exhaust from cars using leaded gasoline during much of the 20<sup>th</sup> century contaminated roadways in the U.S. with lead which is transferred to tires of cars operated on those roadways. Crumb rubber produced from U.S. tires will likely be contaminated with trace amounts of lead from the roadways. Analysis of urban and rural soils in the U.S. show varying trace amounts of lead in the soil.

Over the past few decades, new chemical analytical techniques have been developed that allow scientists to be able to detect lower and lower levels of lead and other elements. Some materials that at one time would have been said to have undetectable levels of lead, now can be shown to have very low, but detectable levels of lead.

With the widespread presence of lead in the environment and with more sophisticated analytical techniques for detecting lead, it is not likely to find materials that are "lead free". Although no lead containing materials are intentionally added to synthetic turf components, there are pigments and fillers added to the turf fibers and backings that are mined from the earth. Any material that is mined or comes from natural sources is likely to have detectable levels of lead. Therefore, stating that any synthetic turf product is "lead free" is not likely to be a true statement.

The components used in Shaw Sports Turf do not contain any intentionally added lead. However, with the ubiquitous presence of lead in the environment, we cannot say that any product is totally free of any trace amount of lead.

Phil M. Stricklen, Ph.D Director of Sports Turf R&D Shaw Industries