

Summary from the reviewer of EPA (on personal title. The comments provided are those of the reviewer and do not present any official position):

The overall assessment of the scientific quality of the study and the approach taken is very good. The assessment takes into account the short-time frame for the sampling, analysis and report development that was required. The rationale for this assessment includes:

- The large number of fields sampled.
- The chemical analyses performed were comprehensive and included some bioaccessibility measurements based on chemical- and route-specific considerations;
- The exposure assessment is based on default assumptions as there was not sufficient time to observe or make exposure measurements. The assessment used assumptions that are *presumed* to be biased on the conservative end, i.e., likely to overestimate exposure. However, the specifics of any actual scenario may not substantiate this assumption.
- The toxicity assessment was based on literature values for a limited set of chemicals identified as being above some regulatory threshold. This is a standard approach. However, it assumes that only those chemicals that are known are of potential concern. An effort was made to address cumulative effects.

The overall conclusion of negligible risk is a policy decision based on comparison of results of carcinogenic evaluation to a 1 in a million excess cancer for the scenarios evaluated. It is acknowledged that use of the fields is at the discretion of "users". Continued review for new information is appropriate to adjust assumptions, as relevant.

The RIVM scientists and the authors of the report are to be highly commended for the completion of this major study in such a short time frame. The sampling and analysis of 100 football pitches for rubber granulates represents the largest study of its kind to date. The completion of the evaluation of potential risk associated with the materials in rubber granulates within a few months is noteworthy.