

Sept 17, 2021

Department of Toxic Substance Control  
Safer Consumer Products Program

We strongly support listing tires and products containing 6PPD Quinone as a Priority Product. 6PPD is proven to be responsible for wiping out over 90% of endangered Coho Salmon in CA, OR and WA and poses a risk to human health and other wildlife.

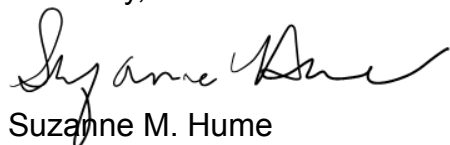
6PPD Quinone from tires is significantly impacting two populations of coho salmon in California, one species is listed as endangered and the other species is listed as threatened by the Endangered Species Act. Also, lab tests suggest the decline in coho population over the past 60-70 years is due to 6PPD Quinone in runoff and waterways.

While 6PPD Quinone threats to humans have not been evaluated, the chemical structure and other properties of 6PPD Quinone point to it's potential danger. According to CCR, title 22, section 69403.15, "the reactivity in biological systems hazard trait is defined as the occurrence of rapid reactions with molecules in the body that lead to alterations in critical molecular function and ultimately adverse health outcomes."

6PPD also represents a danger to both humans and wildlife through the widespread use of tire crumb rubber and other recycled tire products. In 2019, CalRecycle managed over 470,000 metric tons of waste tires which contains an estimated 470 metric tons of 6PPD that could easily enter California watersheds and ecosystems. Millions of California youth and children are exposed to 6PPD when they play on athletic fields and playgrounds made from recycled tire products.

We ask DTSC to immediately list tires and products made from tires with 6PPD Quinone as a Priority Product.

Sincerely,



Suzanne M. Hume

S@CleanEarth4Kids.org

(760) 650-2166

CleanEarth4Kids.org