

John Agwunobi, M.D.  
Secretary of Health, State of Florida  
Florida Department of Health  
Tallahassee, FL

Dear Dr. Agwunobi,

We have conducted an extensive review of the medical literature concerning the toxicity and carcinogenicity of arsenic, its environmental and natural occurrence, bioaccessibility and bioavailability, and past medical uses. The purpose of this review was to evaluate the risk of clinical disease associated with the use of CVCA-treated wood for construction of playground equipment and recreational facilities. The available data have not demonstrated any clinical disease associated with arsenic exposure from this use of the CCA-treated wood. In addition, there have been no reported clinical cases of arsenic-induced manifestations that would be concordant with an excessive exposure to arsenic contaminated soil resulting from use of CCA-treated wood at playground and recreational facilities. The physical-chemical properties of arsenic and the method of production of CCA-treated wood prevent a significant exposure from the ordinary and customary use of playground equipment and recreational facilities constructed with this material.

Used since the 1960's, CCA-treated wood has never been linked to skin diseases or cancer in children exposed during recreational use. Manifestations of arsenical skin diseases and cancers would be expected after 30+ years of use if toxic levels of arsenic were leaching from the wood. Thus, the levels of arsenic in or around CCA-treated wood in playgrounds and recreational facilities do not appear to be sufficient to adversely affect the health of children or adults.

Based on a review of the mechanisms of bioaccessibility and bioavailability of arsenic from soil and CCA-treated wood as would occur around playgrounds and recreational facilities, the bioavailability of arsenic from CCA-treated wood is low. Furthermore, the concentrations of arsenic found in Florida soils are as much as two orders of magnitude lower than the acceptable background levels for other parts of the United States. Thus, increases in soil arsenic levels may appear to be elevated at some playground and recreational facilities, but are similar to background levels in other parts of the country. Therefore, the Physicians Arsenic Workgroup agrees with and supports the United States Environmental Protection Agency's directive that "EPS does not recommend consumers replace or remove existing structures made with CCA-treated wood or the soil surrounding those structures."

The potential risks associated with exposure to arsenic-containing soil or wood products are determined by the bioaccessibility and bioavailability of arsenic. Since the bioavailability of arsenic from playground and recreational wood and soil is low, the amount that could be absorbed also remains low and helps to further explain the absence of arsenic toxicity cases associated with the use of playground and recreational structures containing CCA-treated wood.

The Physicians Arsenic Workgroup does not recommend sampling of playground and recreational areas containing customarily used CCA-treated wood. This conclusion is based upon previous deliberations concerning the toxicity and bioavailability of arsenic. Further, low levels of arsenic, less than 50ppm, are found naturally in many areas of the United States. Finally, the amount of arsenic that could be absorbed from playground soil and CCA-treated wood is not significant compared to natural sources and will not result in detectable arsenic intake.

We thank you for your leadership in addressing this important issue.

Sincerely yours,

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