

# 2539

**From:** Betsy Caesar [betsycaesar@comcast.net]  
**Sent:** Friday, March 14, 2008 4:12 PM  
**To:** IRRC  
**Cc:** mkumagai@cpsc.gov; kelswa@berksiu.org  
**Subject:** Safety Surfacing Regulation

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INDEPENDENT REGULATORY  
REVIEW COMMISSION

Dear Mr. Coccodrilli,

I work with Keystone Stars as their playground safety consultant.

I recently reviewed a copy of the proposed Child Care Regulations and discovered that the safety surfacing recommendations are not going to provide a safe surfacing for children.

The recommendations are based on the surfacing chart found in the "Handbook for Public Playground Safety" published by the U.S. Consumer Products Safety Commission. In the regulations you say that a child care center can use 6" of uncompressed wood chips as a sufficient safety surface. Unfortunately the uncompressed figures are misleading because wood mulch, as well as almost every other surfacing, quickly becomes compressed when placed in a playground. Therefore, only compressed depths of surfacing material can be used. The appropriate depth, as referred to in the "Handbook" is 9" of compressed wood chips.

Unfortunately I will be on vacation for the next week and a half so I will not be able to follow-up with you in this matter. However, Mark Kumagai of the Consumer Product Safety Commission who works on the development of playground safety guidelines would be happy to discuss this issue with you. His phone number is 301-504-7532.

Betsy Caesar Med, CPSI  
President, Playcare, Inc.