THE CHILD SAFE PLAYING FIELD ACT -

HAZARDS AND RISK









MAYFIELD ATHLETIC FIELDS JANUARY 22, 2019

GOALS:

- Discuss relative risks of herbicide controls
- How to evaluate risks of chemical herbicide controls when compared to other chemicals.
- Reach an informed decision on relative merits of using chemical controls vs. student athlete injury.
- Consider a program of chemical treatments in 2019 and future years.

LAWS OF NEW YORK, 2010

CHAPTER 85

"Child Safe Playing Fields Act"

AN ACT to amend the environmental conservation law, the education law and the social services law, in relation to the use and guidance of pesticide alternatives

Became a law May 18, 2010, with the approval of the Governor. Passed by a majority vote, three-fifths being present.

2. No school shall apply pesticide to any playgrounds, turf, athletic or playing fields, except that an emergency application of a pesticide may be made as determined by the county health department or for a county not having a health department such authority as the county legislature shall designate, the commissioner of health or his or her designee, the commissioner of environmental conservation or his or her designee, or, in the case of a public school, the school board.

What is an Emergency?

- . When the problem cannot be managed with the allowed products and/or alternative pest management methods
- . When the pest problem is not routine and is a threat to public health.
- . When the pesticide application is not for purely aesthetic reasons

Paraphrase from:

Emergency Pesticide Application Determinations at Schools and Day Care Centers https://www.health.ny.gov/environmental/pests/guidance_85.htm

Pesticide means:

(1) any substance or mixture of substances intended for preventing, destroying, repelling, or mitigating any insects, rodents, fungi, weeds, or other forms of plant or animal life or viruses, except viruses on or in living humans/or other animals, which the department shall declare to be a pest . . .

6 CRR – NY 326 1 NY – CRR, Title 6, Chapter IV, Subchapter A. Pesticide Control, Part 325. Application of Pesticides, 325.1 Definitions

Pesticides include:

- Insecticides
- Rodenticides
- Fungicides
- <u>Herbicides</u>

Adverse effects of using Pesticides may include:

- 1. Health and well being of student athletes
- 2. Threat to the environment
- 3. Political challenges

Categorizing Types of Risk of Sports on Athletic Fields:

<u>Biological</u> – bacteria, viruses, insects, plants, birds, animals, and humans, etc.

Chemical – depends on the toxic properties of the chemical

Ergonomic – repetitive movements

Physical – collision, ground impact, etc.

Safety – slipping/tripping hazards, compaction or turf breakdowns

Psychological – stress, violence, loss

Adverse effects of using Pesticides may include:

- 1. Health and well being of student athletes
- 2. Threat to the environment
- 3. Political challenges

Beneficial effects of using Pesticides may include:

- 1. Establishment of a healthy turf, leading to the
- 2. Health and well being of student athletes in a
- 3. Cost effectiveness manner

Risk perception is the subjective judgment people make about the severity and probability of a risk, and may vary person to person.

Any human endeavor carries some risk, but some are much riskier than others.

Soccer:

Classified as a high- to moderate-intensity contact/collision sport. Care of the Young Athlete - Sullivan, Anderson, American Academy of Pediatrics, 2000

Higher injury rate than field hockey, rugby, basketball and football.

British Journal of Sports Medicine, 2005: 39(8)

Pediatrics 2002: 110(3)



An estimated 186,544 soccer-related injuries in 2006.

80% affected participants younger than 24 years

44% occurred in participants younger than 15 years

US Consumer Product Safety Commission National Electronic Injury Surveillance System



INJURIES - Over an entire soccer season

Girls' teams may expect 4.0 injuries per season

Boys' teams may expect 3.5 injuries per season

American Journal of Sports Medicine, 2008; 36(2)

The risk of injury is greater during competition than during practice sessions.

American Journal of Sports Medicine, 2006 34 (10)

Soccer:

Most injuries occurring from:

Player-to-player contact
Player-to-goal post contact
Player-to-ball contact
Player-to-ground contact

American Journal of Sports Medicine 2002; 30 (5)



Surface hardness and irregularity are the two main factors identified by players as cause of related-pitch-injury occurrence. The mechanical characteristics of sports surfaces related to athlete-surface interaction could be divided into (i) vertical behavior during impact and (ii) horizontal behavior (traction force) relating to the grip of shoes on the surface.

Influence of Playing Surface on ACL Injuries for Non-Contact Sports:
Dr. P Rouch, G. Charpak, X. Drevelle, P. Thoreux:
SportsTurf Managers Association, February 2017

Healthy grass turf cushions a fall and provides ideal traction.

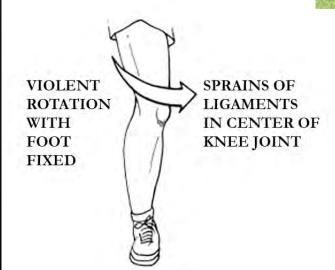


Men's Soccer Injuries

Data from the 2004/05 – 2008/09 Seasons NCAA/ Datalys Center for Sports Injury Research and Prevention/ STOP Sports Injuries



ACL Injury



- Landing leg is extended.
- Landing foot is firmly fixed to the ground.
- The opposing leg drives through, rotating the hips and torso.
- Rotational forces transfer to the knee.
- Creating excessive loading on the knee.
- Causing injury to the Anterior Cruciate Ligament

Mayfield Athletic Fields

- A healthy, dense turf cut to the correct height:
 - Decreases player to surface injuries by
 - Reducing the traction between cleat and ground surface
 - Allowing the foot to rotate with the knee
- Shallow rooted weeds, bare soil or compacted soil will increase traction and increase joint injury
- Clumpy weeds, bare spots and holes in turf will increase tripping hazards

Contributing Factors to Injury:

Holes and other irregularities contribute to lower extremity injuries

Uneven playing surfaces can create excessive loading on ligaments and muscles and contributes to improper landing after jumping.

British Journal of Sports Medicine 2005: 39(8)



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Challenges to a heathy turf

Athletic Use

- Overuse
- Soil compaction
- Physical wear
- Tearing/shearing/divotting of Turf
- Resulting in settlement / holes / bare spots leading to
- Open soil & weed germination

CRABGRASS

- Digitaria sanguinalis (Hairy Crabgrass)
- Digitaria ischamemum (Smooth Crabgrass)

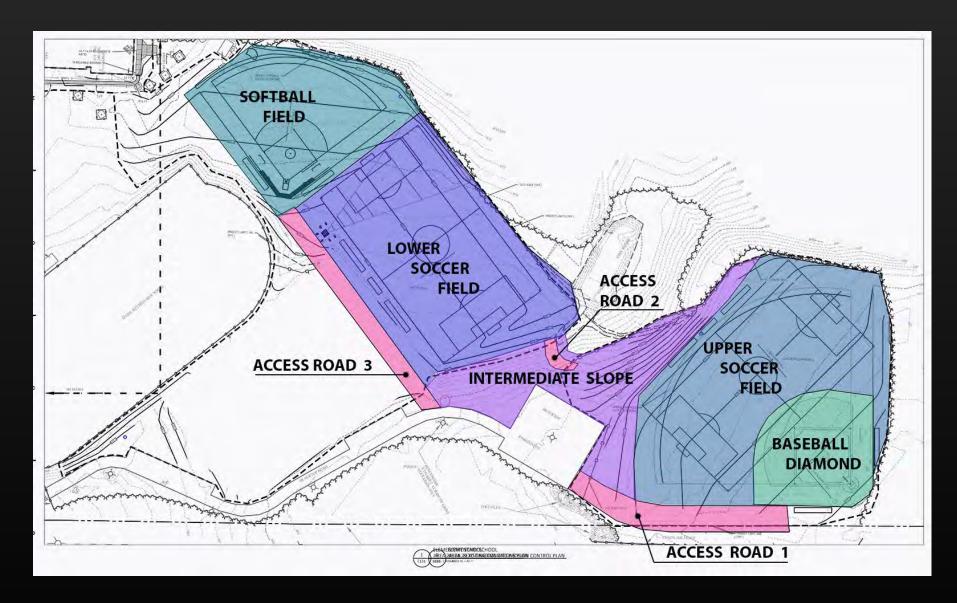
Introduced in 1894 by the U.S. Patent Office as potential forage crops.



Characteristics of Digitaria -

- Prostrate grass
- Seed heads grow horizontally
- Producing seed heads at mowing heights < 1/2-inch
- Produces shallow roots that absorb water before reaching deeper rooting plants
- Tillering occurs within weeks of germination
- One plant can produce 150,000 seeds annually
- 50% of seed will germinate the following spring
- Creation of a large seed bank that will persist for years
- Thrives during hot weather when cool season grasses are under stress or have gone dormant





Elementary School Athletic Fields 2016 - 2018



June 2017





August 2017



August 2017











August 2018 – Softball Outfield

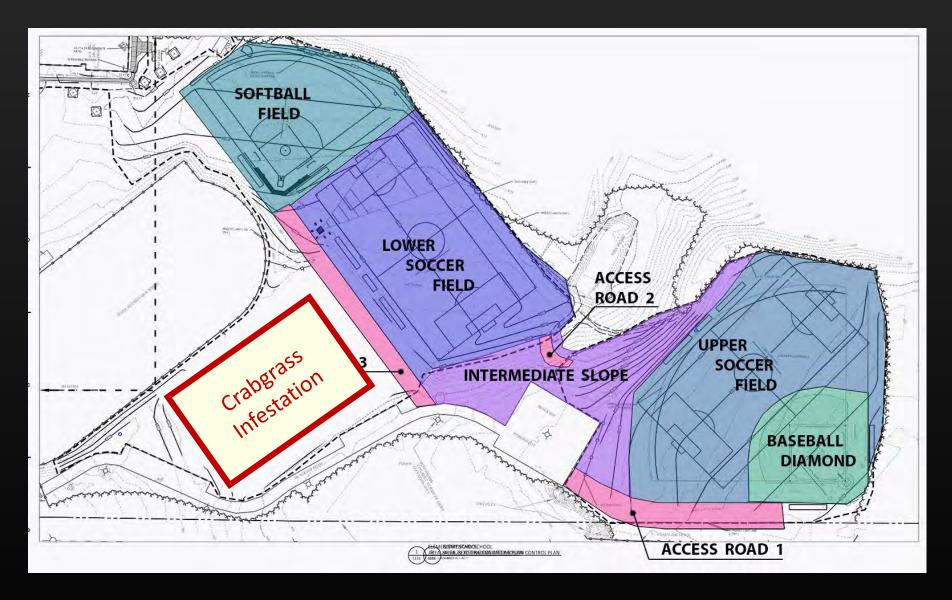


August 2018 – Lower Soccer Field



August 2018 – Upper Soccer Field & 3rd Base Line





Elementary School Athletic Fields 2016 - 2018

Field Conditions

- 1. Fields infested with Digitaria
- 2. An adjacent seed bank that will colonize the practice fields
- 3. Likelihood of seasonal decline in desirable turf species
- 4. Decline in the turf density of the athletic fields
- 5. Diminished safety of the student athletes
- 6. Loss of investment by the community

Goals

- 1. Explain relative risks of herbicide controls
- 2. How to evaluate risks of chemical herbicide controls when compared to other chemicals.
- 3. Reach an informed decision on relative merits of using chemical controls vs. student athlete injury.
- 4. Consider a program of chemical treatments in 2019 and future years.

 Mayfield Athletic Fields

Herbicide Treatment





- Aquatic Toxicity
- Terrestrial Toxicity
- Persistence and Degradability
- Bioaccumulative Potential
- · Mobility in Soil



Skull and Crossbones

- Acute Toxicity
- Oral: toxic if swallowed
- Dermal: toxic in contact with skin
- Inhalation: toxic if inhaled



Exclamation Mark

- Irritant Skin and Eyes
- Skin Sensitizer
- Acute Toxicity Harmful
- Narcotic Effects
- Respiratory Tract Irritant
- Hazardous to Ozone



Health Hazard

- Carcinogen
- Mutagenicity
- Reproductive Toxicity
- Respiratory Sensitizer
- Target Organ Toxicity
- Aspiration Toxicity

OSHA – Occupational Safety and Health Administration Hazard Classification Guidance

Natural Chemicals: not synthetic, i.e. not man-made Example of non-toxic natural chemicals:

- Dihydrogen monoxide (H₂O): water
- Sucrose ($C_{12}H_{22}O_{11}$): table sugar
- Ethyl alcohol (C_2H_5OH): ethanol, drinking alcohol

Examples of toxic natural chemicals:

- Muscimol ($C_4H_6N_2O_2$): found in agaric mushrooms
- Amygdalin ($C_{20}H_{27}NO_{11}$): found in apple seeds
- Solanine $(C_{45}H_{73}NO_{15})$: found in green potatoes

Synthetic Chemicals: not found in nature, i.e. man-made.

Examples of non-toxic synthetic chemicals:

- Teflon (C_2F_4) : non-stick pans
- Propylene glycol (C₃H₈O₂): food additive
- Aspartame $(C_{14}H_{18}N_2O_5)$: artificial sweetener

Example of toxic synthetic chemicals:

- Aspirin ($C_9H_8O_4$): pain-relieving drug
- Ethylene glycol ($C_2H_6O_2$): anti-freeze
- Sodium thiopental ($C_{11}H_{17}N_2NaO_2S$): lethal injections

Herbicide: a substance that is toxic to plants

Synthetic Herbicides:

- 2.4-D $(C_8H_6C_{12}O_3)$
- Glyphosate: (C₃H₈NO₅P)
- Agent Orange $(C_8H_6C_{12}O_3 + C_{12}H_4Cl_4O_2 + C_8H_5Cl_2O_3)$

Natural Herbicides:

- Juglone (C10H6O3): occurring in walnut trees
- Catechin (C15H14O6): occurring in spotted knapweed
- Salt (NaCl)
- Citric Acid (C₆H₈O₇)
- Corn Gluten Meal: derived by the wet milling of corn

Herbicide: a substance that is toxic to plants

Synthetic Herbicides:

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Table 3: Active Ingredients	Exempted Under 25(b) FIFRA
Castor oil (U.S.P. or equivalent)	Linseed oil
Cedar oil	Malic acid
Cinnamon and cinnamon oil	Mint and mint oil
Citric acid	Peppermint and peppermint oil
Citronella and Citronella oil	2-Phenethyl propionate (2-phenylethyl propionate)
Cloves and clove oil	Potassium sorbate
Corn gluten meal	Putrescent whole egg solids
Corn oil	Rosemary and rosemary oil
Cottonseed oil	Sesame (includes ground sesame plant) and sesame oil
Dried Blood	Sodium chloride (common salt)
Eugenol	Sodium lauryl sulfate
Garlic and garlic oil	Soybean oil
Geraniol	Thyme and thyme oil
Geranium oil	White pepper
Lauryl sulfate	Zinc metal strips (consisting solely of zinc metal and impurities)
Lemongrass oil	

EPA 25(b) FIFRA* exempt pesticides

"Child Safe Playing Fields Act"

^{*}Federal Insecticide, Fungicide, and Rodenticide Act

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EPA 25(b) FIFRA exempt pesticides with

Herbicide Potential

Alternative weed control: mechanical removal, boiling water, steam, fire, vinegar, salt, citric acid, corn gluten meal

Some will be impractical – boiling water and steam Some expensive – mechanical removal

Some – fire, salt and citric acid - will be toxic to the existing turf grasses –

- Bluegrass
- Ryegrass
- Fescue

One may have limited merit

Corn Gluten Meal

If crabgrass is knocked back over several seasons with

Pre-emergent Herbicides



The Case for Pre-emergent Herbicides

- Emergency exemption allowed under NY Law
- Board of Education can declare an Emergency
- Cost Effective Contractor is willing to apply herbicides spring 2019 and maintain through 2019
- Chemically effective: one season may achieve success
- Chemical Risk to Student Athletes < Risk of Injury
- Alternative strategies are limited:
 - Accept fields as they are
 - Use only EPA herbicides
 - School District lays sod (?)
 - Contractor lays sod (?)
 - Legal action (?)



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Toxicity: poisonous

"All substances are poisons; there is none which is not a poison. The right dose differentiates a poison from a remedy." - Paracelsus (1493 to 1541)

Sodium nitrite: food additive to prevent botulism. World Health Organization Essential Medicine. Lethal to humans at doses of 1 gram.

Sodium fluoride: source of fluoride in drinking water. Lethal to humans at doses of 5 to 10 grams.

Acetylsalicylic acid: aspirin, a common pain reliever. Lethal to humans at doses of 27 grams/120 pound person. 84 tablets at 325 mg/tablet.

Determining Equivalent Lethality

 LD_{50} = Lethal Dose 50 is the amount of a chemical, given all at once, which causes the death of 50% of a group of test animals.

Expressed as the mass of the chemical per unit mass of the test subject (mg/kg)

Exposure is by the 3 major workplace exposure routes:

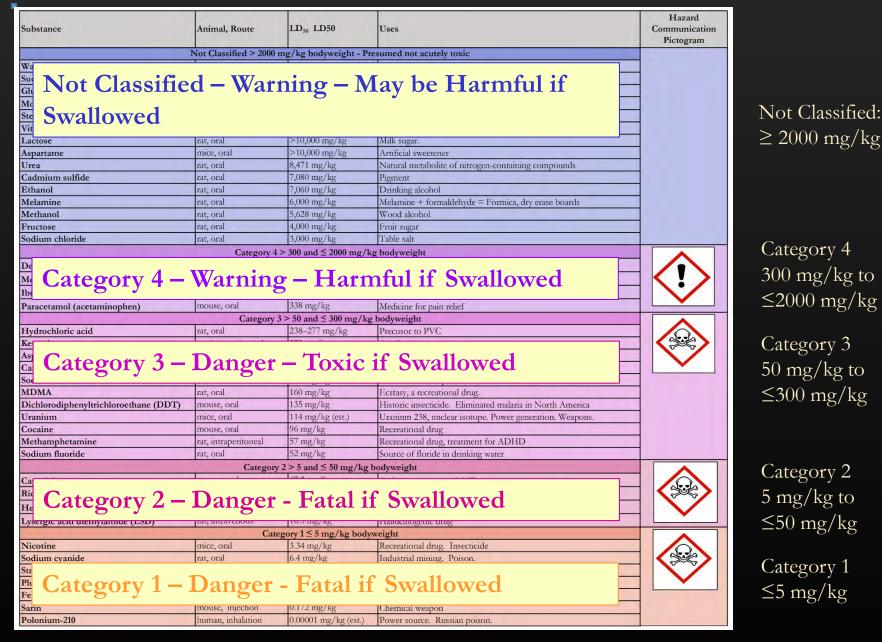
Mouth (oral)

Skin (dermal)

Breathing (inhalation)

 LC_{50} = Lethal Concentration 50 is the lethal inhalation concentration for a 4 hour exposure.

OSHA's Hazard Communication Standards.



Acute Oral Toxicity Categories and Classification Criteria

Category 3 > 50 and ≤ 300 mg/kg bodyweight				
Hydrochloric acid	238–277 mg/kg	Precusor to PVC		
Ketamine	229 mg/kg	Anethesia		
Aspirin (acetylsalicylic acid)	200 mg/kg	Medication		
Caffeine	192 mg/kg	Stimulant		
Sodium nitrite	180 mg/kg	Food additive to prevent boulism. WHO Essential Medicines		
MDMA	160 mg/kg	Ecstasy, a recreational drug.		
Dichlorodiphenyltrichloroethane (DDT)	135 mg/kg	Historic insecticide. Eliminated malaria in North America		
Uranium	114 mg/kg (est.)	Uranium 238, nuclear isotope. Power generation. Weapons.		
Cocaine	96 mg/kg	Recreational drug		
Methamphetamine	57 mg/kg	Recreational drug, treatment for ADHD		
Sodium fluoride	52 mg/kg	Source of floride in drinking water		
Category 2 > 5 and ≤ 50 mg/kg bodyweight				
Capsaicin	47.2 mg/kg	Active component of chilli peppers		
Ricin	20–30 mg/kg	Natural poison from the seeds of the caster oil pl		
Heroin	21.8 mg/kg	Recreational drug		
Lysergic acid diethylamide (LSD)	16.5 mg/kg	Hallucinogenic drug		
Category 1 ≤ 5 mg	/kg bodyweight			
Nicotine	3.34 mg/kg	Recreational drug. Insecticide		
Sodium cyanide	6.4 mg/kg	Industrial mining. Poison.		
Strychnine	1–2 mg/kg (est.)	Small animal pesticide.		
Plutonium	0.320 mg/kg	Nuclear weapons. Power generation.		
Fentanyl	0.300 mg/kg	Pain medication. Anesthesia.		
Sarin	0.172 mg/kg	Chemical weapon		
Polonium-210	0.00001 mg/kg (est.)	Power source. Russian poison.		

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Delta-9-tetrahydrocannabinol (THC)	1,270 mg/kg	Psychoactive con
Cannabidiol (CBD)	980 mg/kg	Non-psycho2
Metallic Arsenic	763 mg/kg	Alloy of 1
Ibuprofen	636 mg/kg	Medi
Paracetamol (acetaminophen)	338 mg/kg	V. 20 . 3
Category 4 Chemicals	- Warning	arning fil
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		Y



reatment for epilepsy

d bullets

wallowed Category 4 Chemicals

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Category 4 Chemicals - Warning

Not Classified > 2000 mg/kg bodyweight - Presumed not acutely toxic

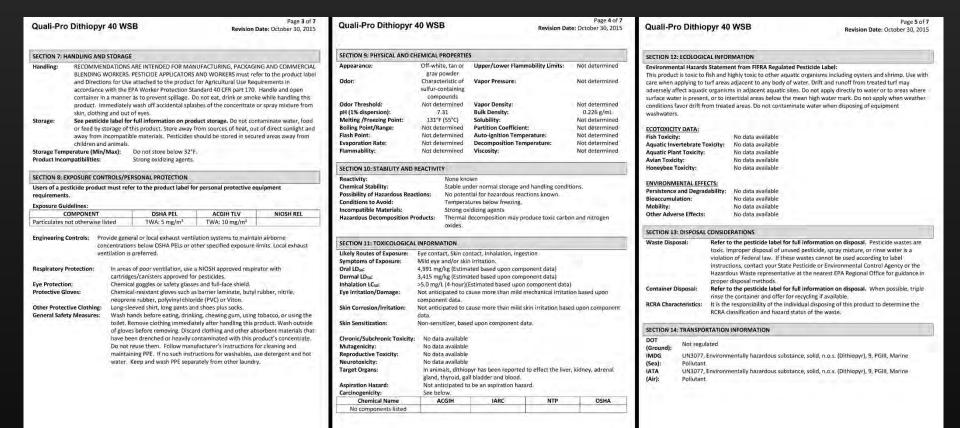
Su	Sucrose: 29,700 mg/kg
GI M	Lactose: >10,000 mg/kg
	Fructose: 4,000 mg/kg

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$\frac{G}{M}$ Lactose: $>10,00$	0 mg/kg	non vegetables		
Lactose: >10,000 mg/kg Fructose: 4,000 mg/kg Sodium Chloride: 3,000 Urea 8,471 mg/kg Cadmium sulfide 7,080 mg/ Ethanol 7,060 mg/kg Melamine 6,000 mg/kg				
Sodium Chlorid	le: 3,000	ains Hai		
Urea	8,471 mg/kg	of nitrogen-containing compounds		
Cadmium sulfide	7,080 mg/			
Ethanol	7,060 mg/kg	alcohol		
Melamine	6,000 mg/kg	mine + formaldehyde = Formica, dry erase boards		
Methanol	5,628 mg/kg	Wood alcohol		
Citric Acid	5040 mg.kg	Citrus fruits		
Fructose	4,000 mg/kg	Fruit sugar		
Sodium chloride	3,000 mg/kg	Table salt		

Not Classified - Warning: May be Harmful if Swallowed

Acute Oral Toxicity Categories and Classification Criteria



Safety Data Sheets - SDS

Dithiopyr 40 WSB – a pre-emergent herbicide

Quali-Pro Dithiopyr 40 WSB

Revision Date: October 30, 2015

SECTION 11: TOXICOLOGICAL INFORMATION

Likely Routes of Exposure: Eye contact, Skin contact, Inhalation, Ingestion

Symptoms of Exposure: Mild eye and/or skin irritation.

Oral LD₅₀: 4,991 mg/kg (Estimated based upon component data)

Dermal LD₅₀: 3,415 mg/kg (Estimated based upon component data)

Inhalation LC₅₀: >5.0 mg/L (4-hour)(Estimated based upon component data)

Eye Irritation/Damage: Not anticipated to cause more than mild mechanical irritation based upon

component data.

Skin Corrosion/Irritation: Not anticipated to cause more than mild skin irritation based upon component

data.

Skin Sensitization: Non-sensitizer, based upon component data.

Chronic/Subchronic Toxicity: No data available

Mutagenicity: No data available Reproductive Toxicity: No data available

Neurotoxicity: No data available

Target Organs: In animals, dithiopyr has been reported to effect the liver, kidney, adrenal

gland, thyroid, gall bladder and blood.

Aspiration Hazard: Not anticipated to be an aspiration hazard.

Carcinogenicity: See below.

Chemical Name	ACGIH	IARC	NTP	OSHA
No components listed				

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12. ECOLOGICAL INFORMATION

ENVIRONMENTAL HAZARDS: This product is toxic to fish and highly toxic to other aquatic organisms including oysters and shrimp. Use with care when applying to turf areas adjacent to any body of water. Drift and runoff from treated turf may adversely affect aquatic organisms in adjacent aquatic sites. Do not apply directly to water or to areas where surface water is present, or to intertidal areas below the mean high water mark. Do not apply when weather conditions favor drift from treated areas. Do not contaminate water when disposing of equipment washwaters

Dithiopyr 40 WSB – a pre-emergent herbicide

11. TOXICOLOGICAL INFORMATION

ACUTE TOXICITY/IRRITATION STUDIES:

Acute Oral LD50 (Rat): >5,000 mg/kg

Acute Dermal LD50 (Rat): >2,000 mg/kg

Acute Inhalation LC50 (Rat):1.81 mg/L air (4-hours)

Eye Irritation (Rabbit): Mildly Irritating

Dermal Irritation (Rabbit): Practically Non-Irritation (Rabbit)

Dermal Sensitization (Guinea Pig): Sensitizing (Guinea Pig)

12. ECOLOGICAL INFORMATION

SUMMARY OF EFFECTS (Prodiamine): Highly toxic to fish and invertebrates. Practically non-toxic to birds and bees.

Prodimine 65 – a pre-emergent herbicide

Quali-Pro Dithiopyr 40 WSB				
SECTION 11: TOXICOLOGICAL INFORMATION				
Likely Routes of Exposure: Symptoms of Exposure: Oral LD ₅₀ : Dermal LD ₅₀ : Inhalation LC ₅₀ :	Eye contact, Skin contact, Inhalat Mild eye and/or skin irritation. 4,991 mg/kg (Estimated based up 3,415 mg/kg (Estimated based up >5.0 mg/L (4-hour)(Estimated based based based based up >5.0 mg/L (4-hour)(Estimated based			
Cadmium sulfide	7,080 mg/kg			
Ethanol	7,060 mg/kg			
Melamine	6,000 mg/kg			
Methanol	5,628 mg/kg			
Citric Acid	5,040 mg/kg			
Fructose	4,000 mg/kg			
Sodium chloride	3,000 mg/kg			

Quali-Pro [®] Prodiamine 65 WDG					
11. TOXICOLOGICAL INFORMATION					
ACUTE TOXICITY/IRRITATION STUDIES:					
Acute Oral LD50 (Rat): >5,000 mg/kg					
Acute Dermal LD50 (Rat): >2,000					
Acute Inhalation LC50 (Rat):1.81 mg/L air (4-hours)					
, , ,	Irritating				
Dermal Irritation (Rabbit): Practically Non-Irritation (Rabbit)					
Dermal Sensitization (Guinea Pig):	Sensitizing (Guinea Pig)				
Cadmium sulfide	7,080 mg/kg				
Ethanol	7,060 mg/kg				
Melamine	6,000 mg/kg				
Methanol	5,628 mg/kg				
Citric Acid	5,040 mg/kg				
Fructose	4,000 mg/kg				
Sodium chloride	3,000 mg/kg				





















Commercially available at Home Depot For application to Residential Property By the Property Owner





















Commercially available at Home Depot

2,4-D Mecoprop-P Dicambra

LD50 = 375 mg/kg

LD50 = 650 mg/kg

LD50 = 2,000 mg/kg

Sulfentrazone

Danding and leading

Pendimenthalin

Dithiopyr

LD50 = 2,689 mg/kg

LD50 > 4,000 mg/kg

LD50 = 4,991 mg/kg

Environmental Hazards:

Dithiopyr:

This product is toxic to fish and highly toxic to other aquatic organisms. . .

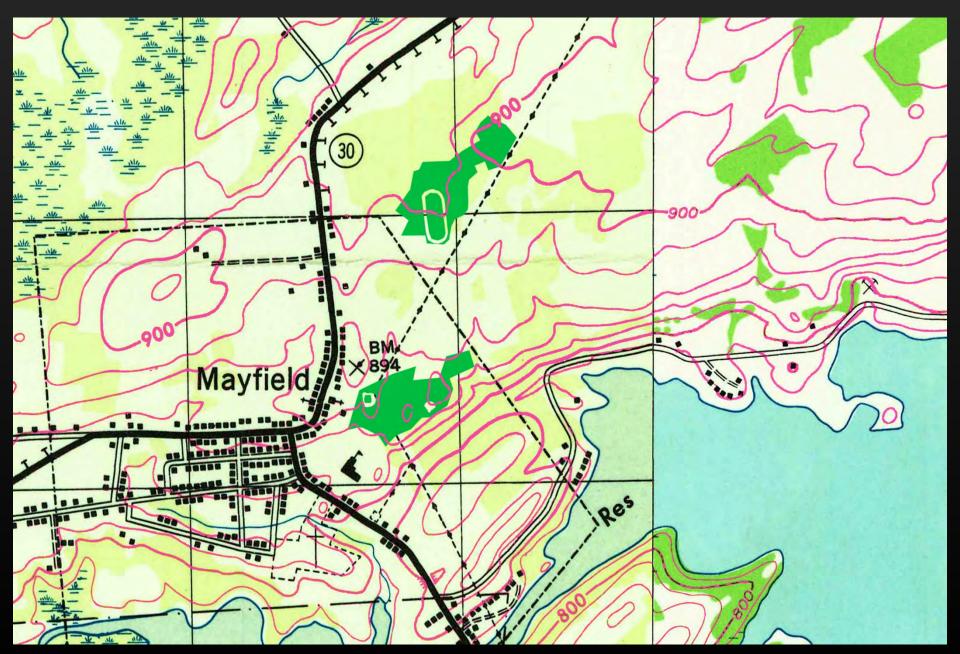
Do not apply directly to water or to areas where surface water is present

Prodiamine:

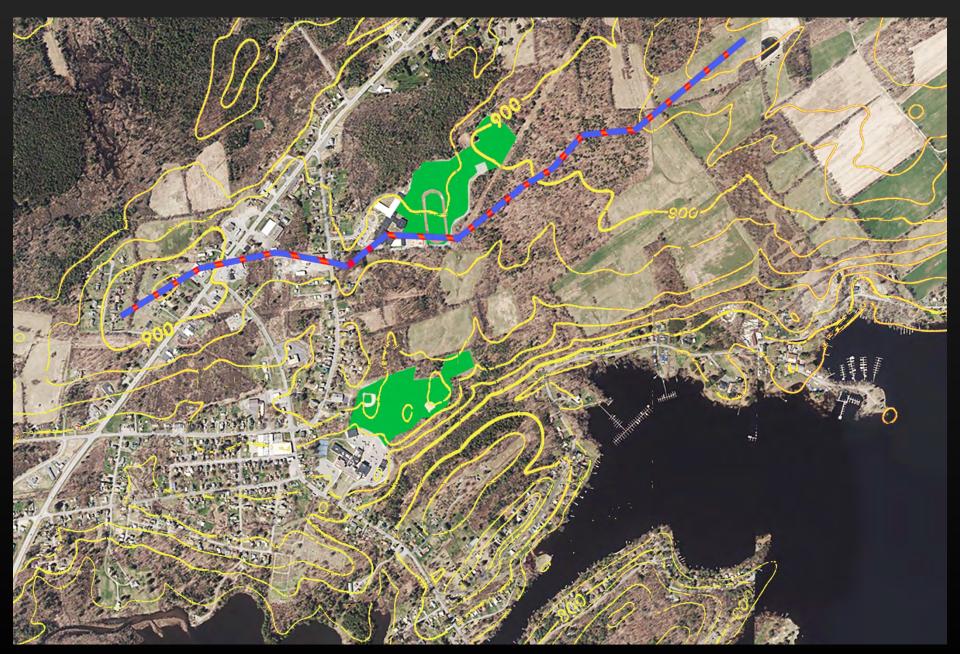
Highly toxic to fish and invertebrates. Practically non-toxic to birds and bees.



Mayfield Athletic Fields

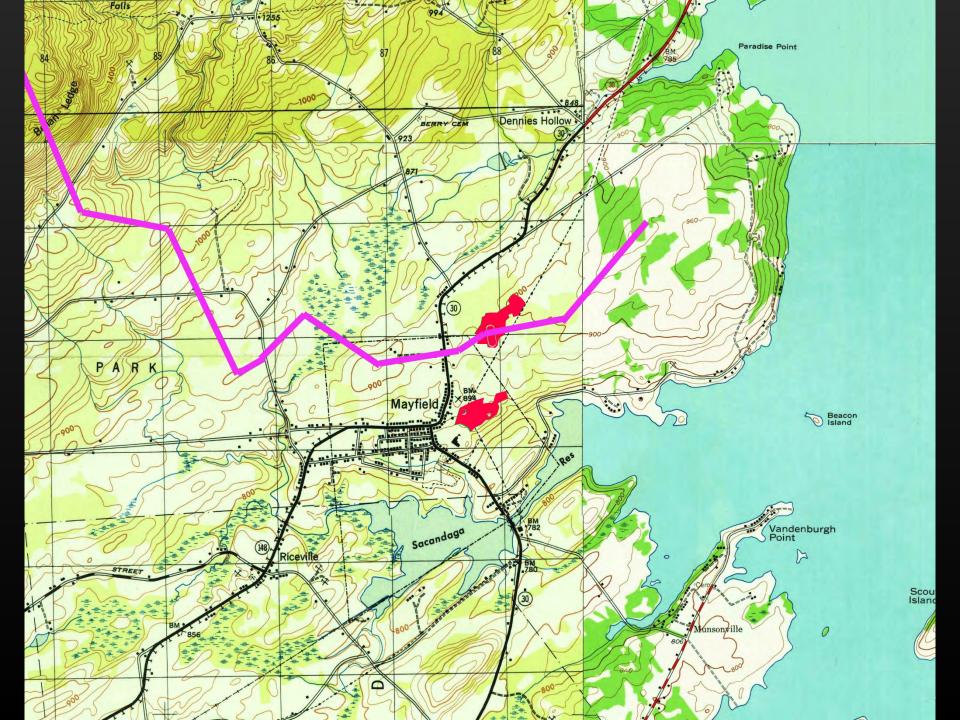


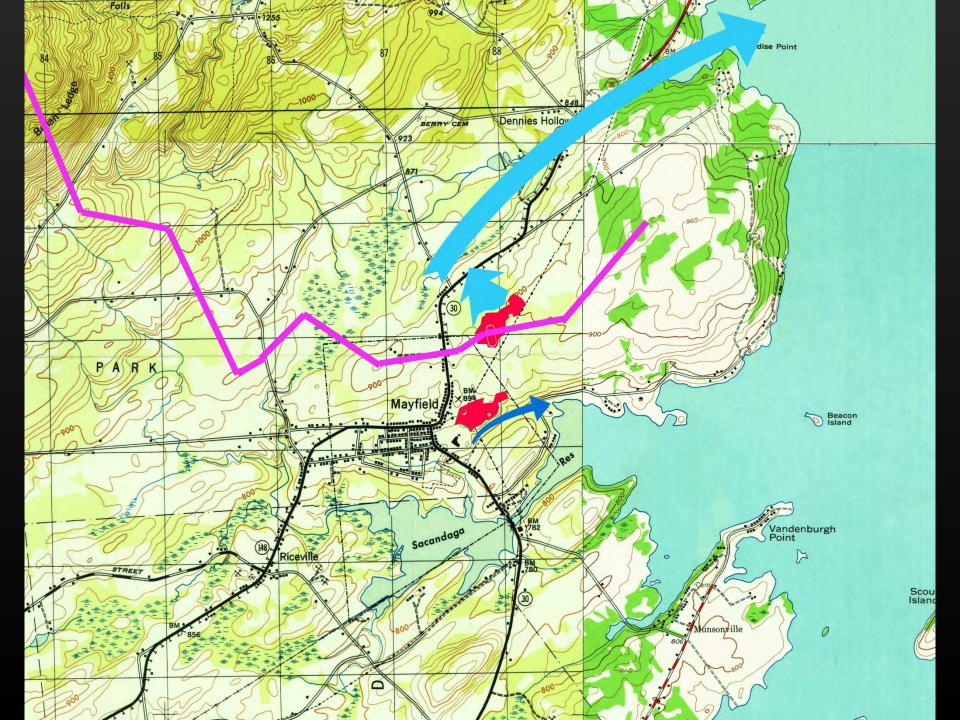
Mayfield Athletic Fields



Mayfield Athletic Fields







Risk assessment is the process where we:

Identify the Hazard

Perform Risk Analysis / Risk Evaluation

Perform Risk Control

Goals:

- 1. Discuss relative risks of herbicide controls
- 2. Discuss how to evaluate risks of chemical herbicide controls when compared to other chemicals.
- 3. Reach an informed decision on relative merits of using chemical controls vs. student athlete injury.
- 4. Consider a program of chemical treatments in 2019 and future years.

REMEMBER

Pesticide means:

(1) <u>any substance or mixture of substances</u> intended for <u>preventing</u>, <u>destroying</u>, <u>repelling</u>, <u>or mitigating</u> any <u>insects</u>, <u>rodents</u>, <u>fungi</u>, <u>weeds</u>, or other forms of plant or animal life or viruses, except viruses on or in living humans/or other animals, which the department shall declare to be a pest . . .

6 CRR – NY 326 1 NY – CRR, Title 6, Chapter IV, Subchapter A. Pesticide Control, Part 325. Application of Pesticides, 325.1 Definitions

Pesticides include:

- Insecticides
- Rodenticides
- Fungicides
- <u>Herbicides</u>

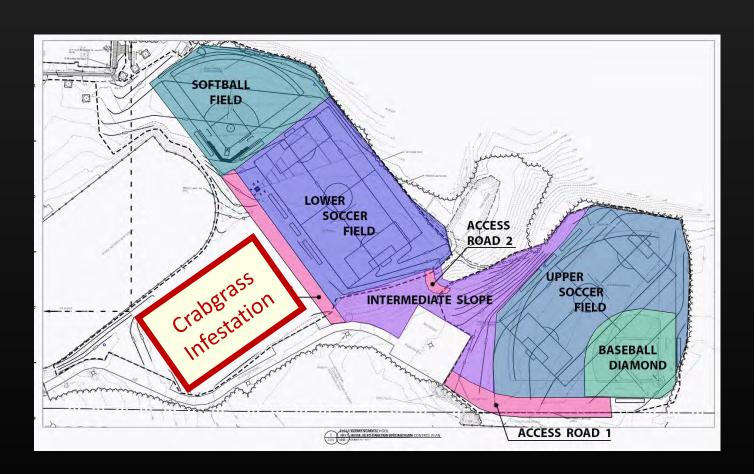
<u>Integrated pest management (IPM)</u> means a systematic approach to managing pests which focuses on long-term prevention or suppression with minimal impact on human health, the environment and nontarget organisms. IPM incorporates all reasonable measures to prevent pest problems by properly identifying pests, monitoring population dynamics, and utilizing cultural, physical, biological or chemical pest population control methods to reduce pests to acceptable levels.

6 CRR – NY 326 1 NY – CRR, Title 6, Chapter IV, Subchapter A. Pesticide Control, Part 325. Application of Pesticides, 325.1 Definitions

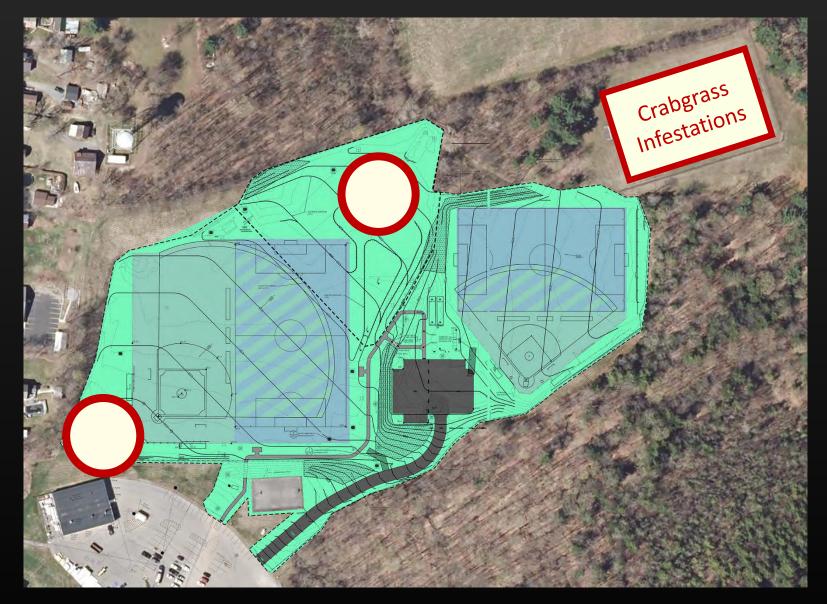
The Case for Pre-emergent Herbicides

- Soccer is a high- to moderate-intensity contact/collision sport.
- Soccer has a higher injury rate than many other sports.
- Poor turf conditions contribute to injury rates.
- Risk of injury > chemical risk to student athletes





Elementary School Athletic Fields 2016 - 2018



High School Athletic Fields 2018 - 2019

Mayfield IPM

- 1. Develop a long-term, systematic approach to maintenance
- 2. Allow the contractor to apply Dithiopyr and/or Prodiamine spring and summer 2019
- 3. Provide the contractor with a supplemental source of irrigation water
- 4. Re-seed with turf grass species in late summer 2019
- 5. Monitor seeding success and density of turf. Identify areas of bare soil.
- 6. Keep people off the fields until spring 2020
- 7. Evaluate effectiveness of pre-emergent weed controls.
- 8. Follow-on application of corn gluten meal and NPK fertilizer
- 9. Practice vigilance in monitoring weed species
- 10. Aggressively eradicate adjacent weed seed banks.
- 11. Develop a long-term, systematic approach to maintenance