

SUPREME COURT OF THE STATE OF NEW YORK  
TOMPKINS COUNTY

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ZERO WASTE ITHACA INC.

Petitioner,

v.

TOWN OF ITHACA PLANNING BOARD  
and CORNELL UNIVERSITY

Respondents.



**Affirmation of Jeff Gearhart**

I, Jeff Gearhart, M.S., Research Director of Ecology Center in Ann Arbor, MI, submit this affirmation on behalf of ZWI's Petition challenging the Negative Declaration and final site plan approval issued by the Town of Ithaca Planning Board (the "Planning Board") for Cornell University's synthetic turf project at Game Farm Road (the "Project").

1. I have over twenty years of experience addressing environmental issues, including air quality, pollution prevention, life cycle assessment, consumer product testing, and green chemistry. For more than sixteen years, I have worked with the Ecology Center, where I led chemicals policy and market campaigns, co-authored peer-reviewed articles on toxics in consumer products, advanced citizen science through the use of x-ray fluorescence technology, Fourier transform Infrared spectroscopy for product testing, and other analytical methods. I developed HealthyStuff.org, an internationally recognized disclosure project providing advocacy resources and testing results for over 100,000 products.
2. I have reviewed the following documents provided by Petitioner: (a) the Galbraith Laboratories total-fluorine (TF) analysis report for the GreenFields TX Pro Plus sample

(Exhibit C); (b) the RTI International Scanning Electron Microscopy and Energy-Dispersive X-ray Spectroscopy analysis (SEM/EDS) report and images for the same product (Exhibit E); and (c) the chain-of-custody and sampling documentation (Exhibit A, B, D).

3. Based on my training and experience and my review of Exhibits C & E, it is my professional opinion that the Galbraith TF screening result (reported at approximately 53 ppm) and the SEM/EDS images showing fluorine signal through the blade cross-section are probative and consistent with the presence of fluorinated material incorporated in the turf polymer rather than incidental surface contamination.
4. In my professional judgment, Method 1633 and other analyte-limited tests alone are insufficient to rule out polymeric or bound fluorinated substances in solid polymer products such as synthetic turf blades and backing. Total-fluorine screening and SEM/EDS are appropriate and necessary complementary screening tools for solids; a positive TF and SEM/EDS signal warrants DEC-standard confirmation and regulatory review of Petitioner's TF and SEM/EDS results before installation.
5. The detection of fluorine through TF analysis and SEM/EDS surface testing provides strong evidence of the presence of organofluorine compounds. In the context of a plastic product such as a synthetic turf system, this fluorine signal is consistent with the presence of PFAS, as plastics do not typically contain inorganic fluorine sources.
6. I have reviewed the chain-of-custody in Exhibit A, B, and D, and, subject to the Court's review, do not see any obvious breaks that would disconnect the reported lab results from the sampled product.

7. I affirm this 22nd day of September 2025, under the penalties of perjury under the laws of New York, which may include a fine or imprisonment, that the foregoing is true, and I understand that this document may be filed in an action or proceeding in a court of law.

A handwritten signature in black ink, appearing to read "Jeff Gearhart". The signature is stylized and cursive, with a long horizontal stroke extending from the end.

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Jeff Gearhart

September 22, 2025