

Paul Davies

WA Dept. of Ecology needs to consider the law of unintended consequences in their regulatory effort.

6PPD is added to tires in order to mitigate tire damage from reactive oxygen species such as ozone. It is a sacrificial additive that continuously migrates to the tire's surface, reacting with ozone so the carbon double bonds in rubber are protected. The tire's initial dose of 6PPD is slowly consumed over the tire's lifespan, and when it runs out, the tire develops cracks and can start to dry rot. Have you ever had a tire shop refuse to rotate your tires because they were too old and therefore unsafe? The reason for this is that with age, the 6PPD runs out.

An unprotected tire with heavy cracking is much more likely to suffer a catastrophic blowout than a tire that's still protected by 6PPD. This is an even bigger concern now than in previous years, because electric vehicles weigh on average 30% more than combustion vehicles, placing greater stress on tires.

The push to restrict 6PPD is an enormous safety problem waiting to happen. Salmon runs do very well in low population areas like the Olympic Peninsula, upper BC, and Alaska. Maybe we need to be content with that and consider urban stream populations expendable.

I would ask supporters of 6PPD regulation whether they think urban salmon are important enough to risk their families in a 70 mph tire blowout. Presently, good drivers can take heart that the risk of a serious accident inversely correlates with driver skill and sobriety, but random tire blowouts would make the roads more dangerous for even the best drivers.

If I'm being asked to tolerate an increased risk of the sudden violent death of my loved ones in order to save the fish of an urban stream, my answer is a resounding no. If Washington bans this additive and asks me to roll the dice on safety, I will buy my tires in a neighboring state instead because tire blowouts are unacceptable.