



# Maryland

## Department of the Environment

Larry Hogan, Governor  
Boyd K. Rutherford, Lt. Governor

Ben Grumbles, Secretary  
Horacio Tablada, Deputy Secretary

February 19, 2020

The Honorable Dereck E. Davis, Chair  
House Economic Matters Committee  
Room 231, House Office Building  
Annapolis, Maryland 21401

**Re: House Bill 1547, Environment - Synthetic Turf and Turf Infill - Producer Responsibility**

Dear Chair Davis and Members of the Committee:

The Maryland Department of the Environment (MDE) has reviewed House Bill 1547, entitled *Environment - Synthetic Turf and Turf Infill - Producer Responsibility*. We would like to provide additional information regarding the bill.

The bill would create a producer responsibility and chain of custody system for synthetic turf and turf infill. The bill would require a producer of synthetic turf or turf infill, either individually or through a stewardship organization, to submit to MDE a stewardship plan for financing the end-of-life management of synthetic turf or turf infill. MDE would be required to review and approve the stewardship plan, and on or after January 1, 2021, a producer would be prohibited from selling, offering for sale, distributing, importing, or offering for promotional purposes synthetic turf or turf infill unless the producer has an approved stewardship plan. By the same date, each producer or, for turf that is already installed, each owner of synthetic turf or turf infill would be required to establish a system to track the chain of custody of the synthetic turf or turf infill through final disposal. Chain of custody information would be required to be submitted to MDE. The bill would also prohibit the reuse of synthetic turf or turf infill unless MDE approves the reuse upon written request by the "original owner" of the synthetic turf or turf infill. After exhausting recycling and reuse options, a person shall dispose of synthetic turf or turf infill in a manner that prevents the material from contaminating air, soil, and water. MDE would be required to maintain a website that includes the stewardship plan information and the chain of custody information.

Synthetic turf is typically composed of plastic blades of grass and an infill material that can be made of various materials, including crumb rubber from recycled tires. Depending on the materials used, synthetic turf and infill would often constitute non-hazardous solid waste that could be managed similarly to other municipal wastes. Additionally, while the Department regulates and imposes certain requirements for disposal and recycling of scrap tires, crumb rubber and other products composed of recycled tires are not considered scrap tires. Used synthetic turf and turf infill that is nonhazardous solid waste may currently be reused, recycled, or properly disposed in a permitted solid waste facility.

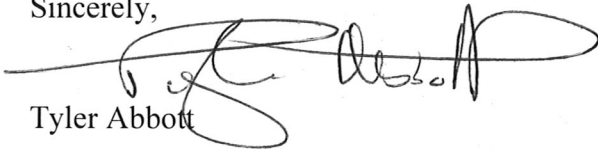
The Honorable Dereck E. Davis, Chair

Page 2

The U.S. Environmental Protection Agency, the Centers for Disease Control and Prevention/Agency for Toxic Substances and Disease Registry, and the Consumer Product Safety Commission initiated a multi-agency Federal Research Action Plan (FRAP) on Recycled Tire Crumb Used on Playing Fields and Playgrounds. The research, which is ongoing, is evaluating the environmental and human health effects of recycled rubber tire crumb used in synthetic turf fields and playgrounds. Additional information on the FRAP can be found at <https://www.epa.gov/chemical-research/federal-research-recycled-tire-crumb-used-playing-fields>.

Thank you for your consideration. We will continue to monitor House Bill 1547 during the Committee's deliberations, and I am available to answer any questions you may have. Please feel free to contact me at 410-260-6301 or by e-mail at [tyler.abbott@maryland.gov](mailto:tyler.abbott@maryland.gov).

Sincerely,

A handwritten signature in black ink, appearing to read 'Tyler Abbott', with a large, stylized flourish extending from the end of the signature.

Tyler Abbott

cc: The Honorable Mary A. Lehman  
Ms. Kaley Laleker, Director, Land and Materials Administration