

HB 299 - FAVORABLE - FARBER - SHPFI.pdf

Uploaded by: Amanda Farber

Position: FAV

HB 299 - FAVORABLE

Amanda Farber
Safe Healthy Playing Fields, Inc; Safehealthyplayingfields.org
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HB 299 SUPPORT - Environment – Synthetic Turf and Turf Infill – Chain of Custody
March 23, 2023 - Before the Education, Energy and Environment Committee

Dear Chair Feldman, Vice Chair Kagan, and Members of the Education, Energy, and Environment Committee:

Safe Healthy Playing Fields Inc (SHPFI) is a grassroots, non-profit organization based in Montgomery County, MD and includes volunteer partners and advocates across the country. **SHPFI strongly supports HB131**, which would require owners of synthetic turf and turf infill to report chain of custody of synthetic turf and turf infill to the Maryland Department of the Environment.

This bill is about transparency and best practices; it is neither punitive nor prohibitive.

All artificial turf fields have limited lifespans and require regular replacement at least every 8-10 years. Some organizations and jurisdictions have fields that have required more frequent replacement. Between the large number of artificial turf fields that must be removed every year, the petrochemical based plastic carpet, the shock pad, and the infill component of each field (consisting of silica sand, tire crumb and/or other infills), this represents a massive amount of material which must be managed. In fact, the industry has characterized the amount of material to be handled as “enormous,” and has acknowledged that synthetic turf components have not always been handled or disposed of responsibly. This bill requires a simple, straightforward reporting of the chain of custody of the materials involved.

The Synthetic Turf Council guidelines themselves recommend chain of custody documentation.

https://cdn.ymaws.com/www.syntheticurfCouncil.org/resource/resmgr/guidelines/STC_Guideline_f or_Recycle_Re.pdf

The Synthetic Turf Council (STC), the “world’s largest organization representing the synthetic turf industry,” released their latest version of their *Guideline to Recycle, Reuse, Repurpose and Remove Synthetic Turf Systems* in 2017. The guidelines include recommendations and multiple examples of chain-of-custody, but there is little in the way of required accountability.

The industry has often used vague or greenwashed language with regards to disposal and recycling. For example, just because an item is theoretically “recyclable” does not mean it is practical to do so. In addition, the term “recycling” is often used when in fact companies are referring to “reusing” or “repurposing.” We do know there are currently no complete circular

synthetic turf recycling facilities in the United States at this time. Synthetic turf can be re-used, landfilled, incinerated, dumped, or stockpiled. Again, this is why chain of custody is critical.

Basic reporting is an opportunity for the industry to be good stewards of their product and the environment.

https://football-technology.fifa.com/media/1230/artificial_turf_recycling.pdf

FIFA, the international governing body for football (soccer) commissioned an Environmental Impact Study of Artificial Football Turf dated March 2017.

The report raises the issue of disposal cost and transparency, stating, “there may be a significant issue with the illegal dumping of waste pitches and this issue will only worsen as an increasing number of pitches will need to be disposed of in the coming years.” The report also warns, “IMPORTANT! Always ask for proof of where the turf is being sent. Illegal dumping is the worst possible end for your pitch!”

A number of recent news outlets have covered the growing problems surrounding the end-of-life disposal of artificial turf - and need for additional transparency and accountability:

- The Atlantic - *Fields of Waste: Artificial Turf Is Piling Up With No Recycling Fix*; December 19, 2019 <https://www.theatlantic.com/science/archive/2019/12/artificial-turf-fields-are-piling-no-recycling-fix/603874/>
- York Daily Record / USA Today - *Worn Out Artificial Turf Fields Pose Huge Waste Problem Across Nation*; November 18, 2019 <https://www.ydr.com/in-depth/news/2019/11/18/old-artificial-turf-fields-pose-huge-waste-problem-environmental-concerns-across-nation/2314353001/>
- Seattle Times - *Feds Order Owner of Dam on Puyallup River to Clean Up Spill From Artificial Turf*; September 3, 2020 <https://www.seattletimes.com/seattle-news/environment/feds-order-owner-of-dam-on-puyallup-river-to-clean-up-spill-from-artificial-turf/>
- Zembla - *The Artificial Turf Mountain*; September 20, 2018 <https://www.bnnvara.nl/zembla/artikelen/the-artificial-turf-mountain>
- Maryland Matters – *Legislation Seeks More Environmental Friendly Turf Removal*; February 20, 2020 <https://www.marylandmatters.org/2020/02/20/proposed-legislation-could-see-more-environmentally-friendly-turf-removal/>

It should not be difficult for stakeholders to obtain basic verifiable information regarding chain of custody of synthetic turf material and turf infill – but it is. HB299 will help ensure more accountable handling of the material.

Thank you, Amanda Farber

Safe Healthy Playing Fields, Inc

HB0299 Synthetic Turf FAV.pdf

Uploaded by: Cecilia Plante

Position: FAV



TESTIMONY FOR HB0299 ENVIRONMENT – SYNTHETIC TURF AND TURF INFILL – CHAIN OF CUSTODY AND REUSE

Bill Sponsor: Delegate Lehman

Committee: Education, Energy, and the Environment

Organization Submitting: Maryland Legislative Coalition

Person Submitting: Cecilia Plante, co-chair

Position: FAVORABLE

I am submitting this testimony in favor of HB0299 on behalf of the Maryland Legislative Coalition. The Maryland Legislative Coalition is an association of activists - individuals and grassroots groups in every district in the state. We are unpaid citizen lobbyists, and our Coalition supports well over 30,000 members.

Synthetic turf is an often-overlooked source of toxicity. It contains toxic metals, such as cadmium, lead and arsenic, in addition to phthalates, which may negatively affect some organs, including reproductive organs. Various substances, including old tires and silica sand, are used to make artificial grass so levels of toxins in artificial turf differ from one manufacturer to the next manufacturer.

Additionally, synthetic turf can negatively affect the environment in many ways. Hosing down artificial turf creates runoff, transferring its elements, such as chromium, to the ground and water supply. When it's time to dispose of artificial turf, it can take decades to break down fully in a landfill. Habitat erosion is another side effect of artificial grass because it does not provide a home or food for insects, birds and other animals.

In Maryland, synthetic turf is not regulated in any way. Often, it is thrown out when it is no longer useful and it sits in landfills. We don't even have information about how much synthetic turf is in Maryland and how it is being disposed of. This bill would ask the Department of the Environment to create a system to track the chain of custody from transportation, installation, removal, reuse or recycling and finally through disposal. This information is necessary to understand exactly how much synthetic turf is in use and how it is disposed of.

The bill does not require any approval from the government – just reporting on the change in custody and is designed to provide transparency around the process. This reporting process helps both the buyer and the seller. It allows the seller to use their compliance and transparency as a selling point for the proper handling of the turf, and it allows the buyer to know that their purchase won't wind up being improperly dumped. It also will prevent improper disposal of a significant quantity of plastic, which Maryland needs to ensure is not being cavalierly dumped in landfills. If we cannot take this small step to

try to get a handle on the deluge of plastic pollution in Maryland, we will have no hope for ever getting out of this fossil fuel crisis.

Our members see this as a required first step to understand how this toxic substance is being handled and we feel that everyone involved in the chain of custody should be supportive of this requirement for themselves and the good of all Marylanders. We support this bill and recommend a **FAVORABLE** report in committee.

HB299_IndivisibleHoCoMD_FAV_CrystalKonny.pdf

Uploaded by: Crystal Konny

Position: FAV



HB299 – Environment - Synthetic Turf – Chain of Custody

Testimony before Senate Education, Energy, and the Environment Committee

March 23, 2023

Position: Favorable

Mr. Chair, Ms. Vice Chair and members of the committee, my name is Crystal Konny, and I represent the 750+ members of Indivisible Howard County. We are providing written testimony today in **support of HB299**, Environment – Synthetic Turf – Chain of Custody bill. Indivisible Howard County is an active member of the Maryland Legislative Coalition (with 30,000+ members). We appreciate the leadership of Delegate Lehman for sponsoring this important legislation.

This legislation will require the Maryland Department of the Environment (MDE) to develop a system to track the chain of custody for synthetic turf fields and turf infill in Maryland from installation to use, repurposing, recycling, and disposal, will require custodians of the fields to report to MDE, and will require MDE to post the information publicly. Public disclosure will serve as a deterrent for improper disposal and illegal dumping, which is currently a real problem.

Synthetic turf playing fields only last an average of 8 to 10 years, and produce a huge volume of waste when they're replaced. The materials in synthetic turf carpet systems contain aquatic and human toxins. When improperly disposed of and uncontained, especially near waterways, these materials pose risks to humans, wildlife, and the environment. There is no official inventory of the number or location of synthetic turf playing fields in Maryland or where used fields have gone. This bill will address that problem.

For all of these reasons, please pass the Synthetic Turf Chain of Custody bill so that MDE will begin inventorying and tracking the chain of custody for synthetic turf fields.

Thank you for your consideration of this important legislation.

We respectfully urge a favorable committee report.

Crystal Konny
Columbia, MD 21044

HB 299.pdf

Uploaded by: Dave Arndt

Position: FAV

March 21, 2023

Testimony on HB 299

Synthetic Turf - Chain of Custody - Position: Favorable

Dave Arndt of Baltimore MD supports HB 299

Hello,

I live in Baltimore where I just saw Under Armour replace a synthetic turf field at their water front headquarters. The old field was ripped-up, thrown into a dumpster and was going to be disposed of. I ask the waste hauler where it was going, they did not know, but speculated that it was either to the Baltimore landfill or the incinerator.

HB299 will require the Maryland Department of the Environment (MDE) to: 1) establish a system to track the lifecycle chain of custody of synthetic turf and turf infill installed on sports playing fields sold or distributed in Maryland; 2) require current and future owners/transporters of fields to report to MDE on synthetic turf and turf infill whenever it changes custody; and 3) require MDE to post the chain of custody information on synthetic turf and turf infill playing fields on its website.

Currently, there is no official inventory of the number or location of synthetic turf playing fields in Maryland or where used fields go, once they are removed, usually every 8-10 years. Tracking synthetic fields throughout their lifecycle is extremely important to protect both public health and the environment. Many components of synthetic turf fields are toxic, including heavy metals, carcinogens, endocrine disruptors, PFAS ("forever chemicals") and more. Also, discarded synthetic turf fields can be a source of microplastics in the environment.

HB299 represents a common-sense solution to keeping tracking of synthetic turf fields once they are removed and every time the material is transported. It is simply good public accountability and transparency, and HB299 ensures that MDE can keep track of synthetic turf materials and that the public can stay informed.

I encourage a FAVORABLE report for this important legislation.

Thank you,

Dave Arndt
1445 Haubert St.
Baltimore MD, 21230
240-328-7383

WDC 2023 Testimony before Senate EEE for HB0299_Fi

Uploaded by: Diana Conway

Position: FAV



MONTGOMERY COUNTY, MARYLAND
WOMEN'S DEMOCRATIC CLUB

P.O. Box 34047, Bethesda, MD 20827

www.womensdemocraticclub.org

**House Bill 299 - Environment - Synthetic Turf - Chain of Custody
Education, Energy and Environment Committee – March 23, 2023**

SUPPORT

Thank you for this opportunity to submit written testimony concerning an important priority of the **Montgomery County Women's Democratic Club (WDC)** for the 2023 legislative session. WDC is one of Maryland's largest and most active Democratic clubs with hundreds of politically active members, including many elected officials.

WDC urges the passage of HB0299. The purpose of the bill is to assure that the growing waste problem from used synthetic turf field carpets and infill is managed transparently and responsibly. House Bill 299 directs the Maryland Department of the Environment (MDE) to implement a tracking system with a chain of custody for each field across its various stages: transportation, installation, removal, reuse, and final disposal.

In the simplest terms, the bill says to the field custodian: *Tell MDE where you got your field, and from whom. If you move it, tell MDE where it went and identify the next custodian.* End of story – no fees, no permits, no approvals. Just point the way to the next link in the chain of custody.

The burdens from this system could not be lower: a one-step, no-cost, online filing, while the benefits of this tracking are significant: ensuring that this growing waste problem is managed transparently, with an eye to protecting human and environmental health.

We know these fields are removed after 7-10 years, but we don't know where they go next. That matters for two reasons: sheer volume and toxic contents.

Volume: Each field amounts to hundreds of tons of bulky, heavy, mixed-plastic waste, all of it unrecyclable anywhere in the US. The Maryland Sierra Club has documented close to 400 synthetic turf fields in just 18 of Maryland's counties; the rest of the state remains uncounted, and even this existing list likely omits a significant number, especially fields in private high schools or colleges.

Toxic Contents: The second reason we need HB0299 is that synthetic turf is loaded with a daunting list of toxic components including heavy metals, carcinogens, and endocrine disruptors. Recently two more toxins were added to the list: the highly toxic PFAS 'forever chemicals,' and the 6PPD quinone found in all tires. Recent findings identified 6PPD quinone



MONTGOMERY COUNTY, MARYLAND
WOMEN'S DEMOCRATIC CLUB

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as the cause of the 95% mortality in endangered coho salmon on the US west coast. It seems unlikely that coho salmon are unique in this sensitivity. We won't stop using tires tomorrow, but we can manage where we put 40,000 granulated, highly mobile tires-worth of waste.

The disposal of used synthetic turf fields must be managed responsibly.

Finally, HB0299 presents an opportunity for sellers to distinguish themselves to buyers by guaranteeing compliance with HB0299, so that parks and schools aren't embarrassed to find their old field is now a neighborhood's contamination and waste problem.

By injecting transparency into the process, HB0299 will secure the verifiable and responsible disposal of each used synthetic turf field that is removed in Maryland.

We ask for your support for HB0299 and strongly urge a favorable Committee report.

Respectfully,
Diana E. Conway
WDC President

NCRH Senate Testimony re Chain of Custody HB299 Ma

Uploaded by: Diana Zuckerman

Position: FAV



NATIONAL CENTER FOR HEALTH RESEARCH

The Voice For Prevention, Treatment And Policy

HB299 - SUPPORT

Dr. Diana Zuckerman

National Center for Health Research

dz@center4research.org; 301 652-0674

HB299 SUPPORT - Environment – Synthetic Turf and Turf Infill – Chain of Custody

March 23, 2023

I am writing to members of the Senate Education, Energy and Environment Committee in enthusiastic support of HB 299 on behalf of the National Center for Health Research (NCHR), as the president of the Center and as a long-time resident of Maryland. The bill would establish a simple chain of custody for synthetic turf. NCHR is a nonprofit think tank that conducts, scrutinizes, and explains research with important public health implications for adults and children. We are nationally respected as a source of unbiased information and do not accept funding from entities with a financial interest in our work.

This is an important bill to the public health of Maryland residents because it would require transparency regarding synthetic turf and turf infill. By enabling the public to be informed about the chain of custody from the time of installation; use; possible reuse; recycling; and disposal, the bill would ensure that individuals, policy makers, and communities would be able to make informed decisions that are essential to the health of adults and children in Maryland. The National Center for Health Research is not an environmental organization, but we are very knowledgeable about the scientific issues pertaining to synthetic turf and infill and how inappropriate disposal of those products can affect the health of Maryland residents.

We urge the immediate passage of this bill, because the lack of transparency regarding the chain of custody of synthetic turf and infill has made it impossible for families, communities, and government officials to make informed decisions that affect the health of adults and children. I speak from experience on this matter: synthetic turf became popular locally while my children were playing soccer while growing up in Maryland, and like most parents I was unaware of the environmental or health issues involved. As I became knowledgeable, I was shocked by the widespread misinformation regarding the disposal of these materials.

As the legislators representing our families, you can improve transparency and help communities, families, and government officials determine how synthetic turf and infill are being used and what happens to those products when they are removed. We strongly urge your favorable report on HB299.

Respectfully submitted,

Dr. Diana Zuckerman
President

HB0299-EEE_MACo_SUP.pdf

Uploaded by: Dominic Butchko

Position: FAV



House Bill 299

Environment - Synthetic Turf - Chain of Custody

MACo Position: **SUPPORT**

To: Education, Energy, and the Environment
Committee

Date: March 23, 2023

From: Dominic J. Butchko

The Maryland Association of Counties (MACo) **SUPPORTS** HB 299. The bill seeks to create a system whereby synthetic turf can be tracked through its entire lifecycle, from production to eventual recycling or disposal. Counties support this effort and the friendly clarifying amendments.

House amendments have addressed initial concerns from county governments, park departments, and facility managers. Counties are grateful for these alterations, and pleased to support this bill as a resolution to extended work on this important issue.

Synthetic turf is a widely used product in the parks and recreation space meant to mimic grass fields. The turf is primarily used to cover spaces that experience a high volume of use and where natural grass may offer an unreasonable expense or be labor intensive to maintain. High volume usage of artificial fields can, overall, reduce the need for expensive and more rigorously maintained natural fields.

Counties support the intent of HB 299 as amended, establishing a statewide inventory of synthetic turf fields through a chain of custody system. Changes made by the House simply clarified certain technical provisions within the bill, ensuring counties can implement this new program. Accordingly, MACo urges the Committee to issue a **FAVORABLE** report for HB 299.

HB 299.pdf

Uploaded by: Jerry Garson

Position: FAV



Education, Energy, and the Environment Committee

Dear Senator Brian Feldman and other Committee Members:

I am Jerry Garson writing on behalf of The Montgomery County Civic Federation, Inc. (MCCF) which represents about 150,000 Montgomery County residents. The MCCF considered bill HB299. Environment - Synthetic Turf - Chain of Custody. The Civic Federation unanimously voted in favor the legislation for the following reasons:

This legislation would require the Maryland Department of Environment to establish a system to track the chain of custody of synthetic turf sports or playing fields installed in Maryland. These fields contain dangerous materials. The basic point is we just want to know where these things went and the materials were disposed properly. This is about transparency.

The Fiscal and Policy Note indicates only a \$52,400 cost for Fiscal Year 2024 and only \$13,800 for Fiscal Year 2025.

HB 131 passed the House of Delegates by a vote of 103 to 31 on March 10, 2023.

The mission of the MCCF is to preserve and improve the quality of life for all current and future residents of Montgomery County, Maryland. Since its founding in 1925, the volunteers of the MCCF have committed themselves to providing an effective citizen voice to government policy makers, both elected and appointed.

The Civic Federation is a not-for-profit, county-wide umbrella group designed to promote cooperation, education and effectiveness of civic and community associations in Montgomery County.

It addresses a wide range of concerns in transportation, land use, environment, education, budget and finance, public safety, and ethics. With its strength of numbers and thoroughness of its deliberations, the Federation influences county policy and balances the activities of vested county pressure groups.

Thank you for considering our views.

Jerry Garson

PGC-MC - Planning Position Statement HB299 Environ

Uploaded by: Jordan BaucumColbert

Position: FAV



MONTGOMERY PARKS
 The Maryland-National Capital Park and Planning Commission
 2425 Reedie Drive | Wheaton, MD 20902
 MontgomeryParks.org



POSITION STATEMENT

Bill: HB 299 – Environment - Synthetic Turf - Chain of Custody

Position: SUPPORT **Date:** March 23, 2023

Contact: Mike Riley, Director, Montgomery County Parks Department
 Bill Tyler, Director, Prince George’s County Department of Parks and Recreation

Dear Chair Brian J. Feldman and Vice Chair Cheryl C. Kagan,

The Montgomery County Parks Department and the Prince George’s County Parks and Recreation Department are in support of this bill. We respectfully ask the Education, Energy and Environment Committee for a favorable report.

What The Bill Does: This bill would enable the Maryland Department of the Environment (MDE) to collect reliable information about the lifecycle of synthetic turf or turf infill materials in the state by requiring owners to report when and how they recycle or dispose of those materials.

Why We Support: The Maryland-National Capital Park and Planning Commission (“Commission”) is responsible for managing 10 existing synthetic turf fields serving the everyday needs of thousands of active families in Montgomery and Prince George’s counties. In this context, the managers of our park and recreation operations anticipate an ongoing process of adding new fields and restoring old ones to keep up with a growing community demand.

At the same time, our agency leaders recognize competing community concerns exist about the long-term environmental impact when synthetic materials enter the disposal or recycling streams. As an agency founded in part to pursue environmental stewardship, the Commission supports responsible reuse and disposal of turf materials with a focus on ensuring recycling. This legislation would establish transparency and public accountability by mandating disclosure to MDE, coupled with appropriate fines for field owners who fail to disclose their disposal activities.

Our team plans to achieve compliance by modifying our current procurement process to require the necessary information regarding disposal practices and reporting required by this bill.

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HB0299_FAV_Mallek_sm2.pdf

Uploaded by: Kate Mallek

Position: FAV

HB 299 - SUPPORT
Kate Mallek
kate.mallek@gmail.com • 434-466-0858

HB 299 SUPPORT - Environment – Synthetic Turf – Chain of Custody • March 23, 2023

Dear Members of the Senate Education, Energy and Environment (EEE) committee:

I share these comments today in **support** of *HB 299- Synthetic Turf - Chain of Custody*, sponsored by Delegates Lehman et al. I am an environmental and human health advocate who has worked on pollution and water quality issues for more than twenty years. In the last ten years, I have guided athletes, sports officials, parents, and community members in making safer personal choices to protect themselves or their family members who must play on synthetic turf. I am also a certified girls lacrosse official and league assigner. I work on this surface because I love my game and I support girls playing sports. But make no mistake, the surface is awful to play on, detrimental to people and our environment, and requires responsible management to deal with the realities of its existence. Ultimately, no one should have to choose between playing sports and playing on synthetic turf.

Disposal Pollution

In 2017, Albemarle County, Virginia, was polluted by the dumping of **more than 200 tons** of discarded synthetic turf fields from a replacement project completed by the University of Virginia. The discarded synthetic turf was rolled up, driven truckload after truckload into rural Albemarle County by a contractor, and dumped on a hillside above a stream.

When nearby residents first noticed it, the landowner had it moved to a more private site, where it was partially buried. When it was found again a few months later, the landowner was cited for an illegal dump, and **the portion of the waste synthetic turf that was recoverable** was taken to a landfill. I have reviewed waste receipts for 199 tons of material for this specific project.



Images courtesy of Virginia DEQ

To be clear, a traditional landfill is NOT an appropriate outcome for contaminated plastic waste and pollutants, but Virginia does not currently have a better mechanism in place with which to handle this mess, nor to record the magnitude of nor method for localities handling waste from synthetic turf replacement projects. **When no information is gathered, citizens are prevented from having a choice to protect their families and important natural resources from damaging pollution.**

Piles of discarded synthetic turf fields are building up on industrial lots, behind businesses, and on country sites away from prying eyes, across the United States.

Responsible states can do better.

Routine Daily Pollution

Synthetic turf is **constantly shedding particles**, including crumb rubber or other infills and pieces of the plastic grass “blades” from its matting.

This picture is of my bag and shoes after working a lacrosse game on synthetic turf in April 2022 in central Virginia. All of my personal items, and most of my body, was coated with shreds of plastic, crumb rubber, and toxic dust as I left the field.

This **endocrine-disrupting pollution** is left like a trail of breadcrumbs when players and personnel depart the field, get in their cars, and return to their homes. Please imagine the amount that falls from and blows out of trucks along roadways, sidewalks, and into drainage ditches to waterways as hundreds of tons of deteriorating synthetic carpet and loose crumb rubber infill waste is transported to some destination for dumping.



Synthetic turf is an **ecological nightmare** that keeps on giving in every community in which it is installed or dumped. **Forever chemicals remain damaging for generations**, causing chronic diseases, birth defects, and longterm environmental and wildlife damage. Infills containing heavy metals and various cancer-causing substances easily wash away in heavy rains, with potential to threaten streams, rivers, and drinking water far from their original location.

Progress in Maryland

With HB 299, the State of Maryland has a great opportunity to **serve citizens, communities, and environmental health** by providing **transparent** information about synthetic turf application, transportation, and fate.

Holding producers, installers, owners, and transporters of synthetic turf products properly to account for the full life cycle of these products **places the burden appropriately onto the entities who make money from the product**. Extended producer responsibility is the logical way that manufacturing should account to communities in a reasonable society. At a bare minimum, citizens deserve transparent information. With bills like HB 299, you can track, discourage, and ultimately prevent irresponsible dumping happening in your communities.

Maryland can do this! HB 299 will help corporate actors and manufacturers to fulfill their promises to provide more reliable information. HB 299 will help school systems and municipalities to assess and verify that they are choosing upstanding and accountable vendors. HB 299 will help buyers, owners, and decision makers to avoid improper handling of materials in their districts, which can cause significant embarrassment along with human and environmental consequences.

HB 299 is a good choice for Maryland.

Thank you for your consideration. **Please support HB 299 for transparency and chain of custody for synthetic turf.**

Kate Mallek
Albemarle County, Virginia
kate.mallek@gmail.com

FSPTA HB0299 (Senate).docx.pdf

Uploaded by: Laura Stewart

Position: FAV

**Written Testimony Submitted for the Record to the Maryland Senate
Education, Energy, and the Environment Committee
For the Hearing on Environment - Synthetic Turf - Chain of Custody- HB0299
March 23, 2023
SUPPORT**

Free State PTA represents over 60,000 volunteer members and families in over 500 public schools. Free State PTA is composed of families, students, teachers, administrators, and business as well as community leaders devoted to the educational success of children and family engagement in Maryland. As the state's premier and largest child advocacy organization, Free State PTA is a powerful voice for all children, a relevant resource for families, schools and communities and a strong advocate for public education. ***House Bill 299, Environment - Synthetic Turf - Chain of Custody - aligns with Free State PTA's environmental legislative agenda***

A founding principle of Free State PTA's (FSPTA) mission is to promote the safety and well-being of all children and youth, which includes a healthy environment. House Bill 299 is consistent with this principle in that it requires the department shall establish a system to track the chain of custody of synthetic turf installed on sports and playing fields in the state, from their transportation, installation, and removal to their reuse, recycling and final disposal.

Artificial turf fields are continuing to be implemented in Maryland schools. Each field adds to plastic waste when they need to be replaced every 8-10 years. This plastic, and microplastic waste as the plastic breaks down, adds to environmental concerns for future generations. Tracking the waste will inform caretakers so that they can mitigate and track potential environmental damage. We support the amended bill that was passed in the House of Delegates. **Therefore, the Free State PTA urges the passage of HB0299.**

Testimony is presented on the behalf of

Marla Posey-Moss

Marla Posey-Moss, President
mposey-moss@fspta.org

HB0299 Synthetic Turf_Educ Energy Environment-CJW-

Uploaded by: Laurie McGilvray

Position: FAV



Committee: Education, Energy, and the Environment
Testimony on: HB0299 - Environment - Synthetic Turf - Chain of Custody
Organization: Maryland Legislative Coalition Climate Justice Wing
Submitting: Laurie McGilvray, Co-Chair
Position: Favorable
Hearing Date: March 23, 2022

Dear Chair and Committee Members:

Thank you for allowing our testimony today in support of HB299. The Maryland Legislative Coalition (MLC) Climate Justice Wing, a statewide coalition of over 50 grassroots and professional organizations, urges you to vote favorably on HB299.

HB299 will require the Maryland Department of the Environment (MDE) to: 1) establish a system to track the lifecycle chain of custody of synthetic turf and turf infill installed on sports playing fields sold or distributed in Maryland; 2) require current and future owners/transporters of fields to report to MDE on synthetic turf and turf infill whenever it changes custody; and 3) require MDE to post the chain of custody information on synthetic turf and turf infill playing fields on its website.

Currently, there is no official inventory of the number or location of synthetic turf playing fields in Maryland or where used fields go, once they are removed, usually every 8-10 years. Tracking synthetic fields throughout their lifecycle is extremely important to protect both public health and the environment. Many components of synthetic turf fields are toxic, including heavy metals, carcinogens, endocrine disruptors, PFAS (“forever chemicals”) and more. Also, discarded synthetic turf fields can be a source of microplastics in the environment.

HB299 represents a common-sense solution to keeping tracking of synthetic turf fields once they are removed and every time the material is transported. It is simply good public accountability and transparency, and HB299 ensures that MDE can keep track of synthetic turf materials and that the public can stay informed.

We recommend a **FAVORABLE** report for HB299 in committee.

HB 299 - MoCo_Elrich_FAV_Senate (GA 23).pdf

Uploaded by: Marc Elrich

Position: FAV



OFFICE OF THE COUNTY EXECUTIVE

Marc Elrich
County Executive

March 23, 2023

TO: The Honorable Brian Feldman
Chair, Education, Energy, and the Environment

FROM: Marc Elrich
County Executive

RE: House Bill 299, *Environment – Synthetic Turf – Chain of Custody*
Support

I am writing to express my support for House Bill 299, *Environment – Synthetic Turf – Chain of Custody*. The bill requires owners of artificial turf fields to submit to the Maryland Department of the Environment a chain of custody providing technical information on how the field is constructed and where it is located. If the field is replaced, the location of where the old field was reused or disposed is to be provided. This bill will minimize the possibility of disposing of the old field, including the infill and carpet, inappropriately.

Ample evidence has raised serious concern about the materials used in the construction of the fields that could be toxic to the environment and people. Given the chemical context of the crumb rubber as well as the plastic carpet, the artificial turf fields need to be disposed of properly. The chain of custody information required by this bill will provide the public with information on where and how the artificial turf fields are being reused or disposed.

I respectfully request that the Education, Energy, and the Environment Committee give House Bill 299 a favorable report.

cc: Members of the Education, Energy, and the Environment Committee

HB299 Synthetic Turf FAV EEE.pdf

Uploaded by: MARIE LAPORTE

Position: FAV

Marie LaPorte
2516 Chestnut Woods Ct.
Reisterstown, MD 21136

Committee: Education, Energy and Environment
Testimony: HB299 Environment – Synthetic Turf - Chain of Custody
Position: Favorable
Hearing Date: March 23, 2023

I am a Marylander who has resided in Baltimore County for about 28 years and support HB299 Environment - Synthetic Turf - Chain of Custody.

According to data compiled by the Sierra Club, my county has more synthetic turf fields than any other in the state with over 60 fields at 45 different sites across the county. There are about 440,000 pounds of waste associated with each field, which typically includes tire crumb, plastic grass, and backing, which means that my county alone can generate over 26 million pounds of waste every 8-10 years from synthetic turf. It's worth noting that Baltimore County has a single landfill that is expected to reach capacity in 2025.

Further, these synthetic turf fields are frequently dumped on private property as occurred in White March, Maryland with a field transported from Montgomery County. The tire crumb was all over the place with absolutely no containment in an area near the watershed that had recently had expensive remediation.

The tire material frequently used in the synthetic turf fields contains a toxic brew of hazardous chemicals that would classify them as hazardous waste if they were to be landfilled as tires, but once ground up on a field are permitted to be disposed of with no oversight. According to Mount Sinai Children's Environmental Health Center, the "major chemical components of recycled rubber are styrene and butadiene, the principal ingredients of the synthetic rubber used for tires in the United States. Styrene is neurotoxic and reasonably anticipated to be a human carcinogen. Butadiene is a proven human carcinogen that has been shown to cause leukemia and lymphoma. Shredded and crumb rubber also contain lead, cadmium, and other metals known to damage the developing nervous system." ¹

In addition to these chemicals, University of Notre Dame research led by Dr. Graham Peaslee has found PFAS in the grass, backing, and tire crumb of synthetic turf. These chemicals leach from the materials from the first rainfall after installation and continue leaching indefinitely, polluting the ground wherever they go. ²

As about one in seven Marylanders rely on wells for their water, this could present significant contamination issues for homeowners throughout our state. I am a homeowner that relies on well water. Improper disposal could also contaminate our watersheds and impact spawning grounds for our fish and adversely impact other wildlife.

It's important to also consider that many of the health impacts from exposure to toxins take years to develop. The connections between lead paint and leaded gas and the adverse impact on the mortality and intellectual and behavioral development on children took years, as did exposure to asbestos and the many now known cancers. In fact, the world-renowned Dr. Philip Landrigan, whose research led to the banning of lead in paint and gas, and further limits on asbestos, has raised and shared concerns regarding synthetic turf.

These fields come with abundant health and safety concerns that I hope legislators address in future legislation, but we should at least start with addressing tracking and disposal of these toxic fields. The state should know where this hazardous waste lies so we can better understand the environmental impact. Whatever the cost for these fields, the damage to the environment will be considerably more. Marylanders and our environment should be protected from the careless disposal of this dangerous waste.

I urge you to provide a favorable report for HB299 Synthetic Turf Chain of Custody.

Sincerely,

Marie LaPorte

¹ Testimony Before Connecticut General Assembly Committee on Children, February 16, 2016. Dr. Sarah Evans, <https://www.cga.ct.gov/2016/KIDdata/Tmy/2016HB-05139-R000216-Sarah%20Evans,%20Icahn%20School%20of%20Medicine%20at%20Mount%20Sinai-TMY.PDF>. Sinai Children's Environmental Health Center, <https://www.cga.ct.gov/2016/KIDdata/Tmy/2016HB-05139-R000216-Sarah%20Evans,%20Icahn%20School%20of%20Medicine%20at%20Mount%20Sinai-TMY.PDF>

² ² *The Intercept*, Toxic Chemicals Found in Artificial Turf, October 8, 2019, <https://theintercept.com/2019/10/08/pfas-chemicals-artificial-turf-soccer/>

HB299_MDSierraClub_fav 23March2023.pdf

Uploaded by: Martha Ainsworth

Position: FAV

Committee: Education, Energy and the Environment**Testimony on: HB 299 “Environment – Synthetic Turf – Chain of Custody”****Position: Support****Hearing Date: March 23, 2023**

The Maryland Chapter of the Sierra Club supports HB 299, which addresses a serious waste problem posed by the lack of transparency and accountability for disposal of synthetic turf. The bill would require the Maryland Department of the Environment (MDE) to establish a system to track the chain of custody for synthetic turf playing fields and turf infill sold or distributed and installed in the state. The bill would also to require each custodian of the synthetic turf and turf infill to report information on its disposition, from installation to removal, reuse, repurposing, recycling, and disposal to MDE.

Synthetic turf sport fields, which account for nearly two-thirds of all synthetic turf,¹ have an 8-10 year average lifetime and produce a large volume of waste, much of it toxic. According to the Synthetic Turf Council (STC), an average field is 80,000 square feet, comprised of 40,000 pounds of mixed plastic turf and 400,000 pounds of infill (usually tire waste and silica sand but sometimes other materials). The infill equates in volume to 400 cubic yards, or the equivalent of almost fourteen 30-cubic-yard dumpsters of infill.² The volume of the mixed plastic turf varies, depending on how it is packaged.

Based on an inventory assembled by the Sierra Club, there are at least 398 synthetic turf playing fields in Maryland, located in 19 counties and the City of Baltimore (Exhibit 1). Using the STC parameters, these fields represent 74,000 tons of plastic turf carpet and infill, 26.7 million square feet of plastic turf, and 135,000 cubic yards of infill likely to be disposed in the next decade when the fields will be replaced.³ While the industry continues to explore ways of recycling, reusing, or repurposing used synthetic turf, ultimately the turf and its components must be disposed.

At present, the fate of this enormous and growing amount of plastic waste and infill in Maryland and the country is difficult, if not impossible, to track. There is currently no documentation on the extent of reuse, repurposing, recycling, and ultimately, disposal of this waste. Several Maryland county waste facilities report they do not accept the volume, weight, and mixture of synthetic turf waste.⁴ While some materials may be landfilled, an unknown share of the millions of square feet of removed synthetic turf

¹ Synthetic Turf Council (STC) website: https://www.syntheticurfCouncil.org/page/About_Synthetic_Turf

²STC. 2017. *A Guideline to Recycle, Reuse, Repurpose, and Remove Synthetic Turf Systems*, p.3.

https://qhi7a3oj76cn9aw13qcqrh3o-wpengine.netdna-ssl.com/wp-content/uploads/2019/11/CR-STC_Guideline_for_Recycle_Re.pdf

³ According to the STC, there are currently 12,000-13,000 synthetic turf sports fields in the United States, and 1,200-1,500 are installed annually. The number deconstructed annually in the United States increased from 365 in 2013 to 750 in 2018. Assuming that the number of fields deconstructed annually has risen to at least 1,000 by 2020, this represents 80 million square feet of plastic turf carpet weighing 40 million pounds and 400 million pounds of infill per year. Disposal of the existing 12,000-13,000 sports fields nationwide amounts to as much as 260,000 tons of turf and 2.6 million tons of infill over the next decade. STC 2017, *op.cit.*

⁴For example, Prince George’s County would not accept synthetic turf fields at its landfill, and these fields are not accepted for incineration or recycling in Montgomery County. If deposited at the Montgomery County transfer station, it would be sent to a landfill in Virginia and charged a \$70/ton tipping fee. For an average sports field, this would amount to more than \$15,000 for disposal, not including the transport costs.

ends up in rural and urban stockpiles or dumped in the environment, sometimes in sensitive ecosystems or vulnerable communities.^{5,6,7} For example, hundreds of tons of worn-out carpet and granulated tire waste from Montgomery County high schools ended up in landfills in rural Virginia, on Bird Creek in Baltimore County, and in Malaysia (Exhibit 2).⁸ Synthetic turf from the University of Virginia was dumped illegally on the side of a mountain.⁹ As of last year, there was only one licensed recycling plant for end-of-life synthetic turf – in Europe.¹⁰

Owners of properties where these plastic carpets are dumped are left to clean up the environmental and physical mess. They face clean-up costs and potential liabilities from the aquatic and human toxins, carcinogens, endocrine disruptors, heavy metal neurotoxins, carcinogens, and immune disruptors such as PFAS “forever chemicals” in the synthetic materials that make up artificial turf carpet systems.¹¹ The direct toxic effects of tire particles have been demonstrated in aquatic organisms in particular.¹²

The STC already recommends maintaining a chain of custody for reuse, repurposing, recycling, and removal of synthetic turf fields,¹³ but accountability requires that the public be informed. HB299’s required reporting to MDE of the chain of custody for synthetic turf and infill will document the number of installations in Maryland; the extent to which synthetic turf and infill is actually reused, repurposed, or recycled; and how and where it is disposed. It will incentivize recycling and proper disposal and provide accountability for improper disposal.

With HB 299, Maryland can be a leader in addressing the waste problem posed by synthetic turf. It will hold those responsible for the materials accountable for proper disposal of synthetic turf through a publicly documented chain of custody. We respectfully request a favorable report.

Martha Ainsworth
Chair, Chapter Zero Waste Team
Martha.Ainsworth@MDSierra.org

Josh Tulkin
Chapter Director
Josh.Tulkin@MDSierra.org

⁵Lundstrom, Marjorie, and Eli Wolfe. 2019. “Fields of Waste: Artificial Turf, Touted as Recycling Fix for Millions of Scrap Tires, Becomes Mounting Disposal Mess,” *FairWarning*. December 19. <https://www.fairwarning.org/2019/12/fields-of-waste-artificial-turf-mess/> Reprinted in *The Atlantic* (12/2019), *Salon* (12/21/2019), and *Maryland Matters* (12/20/2019).

⁶Meyer, Pete. 2019. “Hidden gotcha in artificial turf installation.” *Environmental Health News*, Dec. 4. <https://www.ehn.org/hidden-gotcha-in-artificial-turf-installations-2641507579.html>. Woodall, Candy. 2019. “‘Running out of room’: How old turf fields raise potential environmental, health concerns,” *York Daily Record* (Pennsylvania), November 18.

⁷*The Turf Mountain*, video by Zembla, an investigative TV program on BNNVARA, Dutch Public Television. <https://www.youtube.com/watch?v=Y5o3J7uy4Tk>

⁸ Lundstrom and Wolfe. *op.cit.*

⁹ Meyer, *op. cit.*

¹⁰The Re-Match company, in Denmark. Sources: Woodall, *op.cit.*; *The Turf Mountain*, *op. cit.*

¹¹ Lerner, Sharon. 2019. “Toxic PFAS Chemicals Found in Artificial Turf,” *The Intercept*. October 8. <https://theintercept.com/2019/10/08/pfas-chemicals-artificial-turf-soccer/>

¹²Einhorn, Catrin. 2020. “How Scientists Tracked Down a Mass Killer (of Salmon),” *The New York Times*. December 3. <https://www.nytimes.com/2020/12/03/climate/salmon-kill-washington.html>

¹³STC 2017. *op cit.*, pp 13-18.

Inventory of synthetic turf fields in Maryland

Maryland Sierra Club Zero Waste Team

Updated January 1, 2023

Over the summer and fall of 2021, Sierra Club volunteers worked to inform pending state legislation on tracking the location and disposition of synthetic turf playing fields by conducting an inventory of synthetic turf playing fields in the state. The objective of the exercise was to document the number of fields, estimate the amount of waste that will be generated when the fields are retired, and demonstrate the degree of difficulty to the public of obtaining the information. The volunteers continued to update the inventory throughout 2022.

Methodology

The following information was sought on each synthetic turf playing field currently in place in all 23 counties and the City of Baltimore, both indoor and outdoor fields:

- Name of the field and address
- Sport played
- Ownership of the field (public schools and universities, public parks, private schools and universities, private sports clubs/venues)
- Year the field was installed
- Area of the field in square feet, or its dimensions
- The source of information

Most of the research was done on the internet, which involved accessing websites for: public schools; private schools; colleges and universities; local and major newspapers; athletic organizations and foundations; county departments for parks and recreation; general contractors; and turf installers.¹⁴

These sources were sufficient to identify most fields or venues with fields. However, discovering the year each field was installed and its dimensions usually required follow-up with phone calls and emails. When the dimensions for outdoor fields were not available from a reliable source, the team used Google Earth's tool to measure the area of the field. They were located by their address and were easily distinguishable from natural turf fields. However, because many of the Google Earth photos were not recent, this method could not be used for some of the fields installed more recently. Furthermore, that method could not be used to estimate the dimensions of indoor fields, most of them privately owned. The dimensions of indoor fields were not easily obtained. Many calls and emails were sent, but not all were returned.

¹⁴ General contractors and turf installers consulted (website, email, or phone) included: AstroTurf; Athletic Field Consultants, Inc.; BrockUSA; Fields Inc.; FieldTurf; JMT; Keystone Sports Construction; King Sports Construction; Playrite; Shaw Sports Turf; Sprinturf; and US GreenTech.

As of January 1, 2023, a total of 398 fields have been enumerated in Maryland.¹⁵ The installation date could not be obtained for 84 fields (21%) and field size could not be ascertained for 20 (5%).¹⁶ Field size was obtained from a reliable source for 195 fields (49%), while for 183 (46%) the area was estimated from Google Earth.

To estimate the tonnage of turf and infill, the team used conversion factors from the Synthetic Turf Council's (STC) 2017 publication, *A Guideline to Recycle, Reuse, Repurpose, and Remove Synthetic Turf Systems*. According to this document (p. 3), a typical synthetic turf sports field is about 80,000 square feet (sf) and is comprised of 40,000 lb of turf and 400,000 lb of infill. The volume of infill for a typical sport field would amount to +/- 400 cubic yards. The formulas used for the calculations are:

Estimation of turf weight: $(\text{Field area} / 80,000) \times 40,000 \text{ lb}$

Estimation of infill weight: $(\text{Field area} / 80,000) \times 400,000 \text{ lb}$

Estimation of infill volume: $(\text{Field area} / 80,000) \times 400 \text{ cubic yards}$

The STC report notes that "The volume of the turf removed from the field depends on how it is collected (rolled, cut up, or shredded) and would be considerable in volume." However, the total coverage of the plastic turf carpet can be estimated.

Findings

Number and distribution of turf fields

A total of 398 synthetic turf fields have been identified in Maryland (see Annex Table). It was not a trivial exercise, nor is it likely a complete list. Some fields have surely been missed and more are being approved or installed every year.

The enumerated fields are located in 19 counties and the City of Baltimore; to date, none has been identified in Caroline, Dorchester, Somerset, or Talbot counties. The counties with the greatest number of synthetic turf fields in the inventory are: Baltimore County (65); Montgomery County (64); Howard County (46); Anne Arundel County (43); Baltimore City (40); Prince George's County (40); Harford County (28); Frederick County (20); Wicomico County (13); and St. Mary's County (11). Ten counties had fewer than 10 fields each.

Ownership

More than half of the fields (56%) belong to public schools, parks, or universities. The remaining fields are at private schools (21%) or private clubs/sports venues (21%). Two percent were owned and/or operated by public-private partnerships, or by a public entity other than a school or park.

¹⁵ The initial research was conducted over about 6 months in 2021 and succeeded in enumerating 347 synthetic turf playing fields in 18 counties and the City of Baltimore. This served as the basis for testimony delivered on January 16, 2022, on HB313, "Synthetic Turf and Turf Infill –Chain of Custody." As of the end of the 2022 General Assembly, more fields had been discovered, bringing the total to 380 by April 22, 2022.

¹⁶ Tonnage and volume could not be calculated for these fields.

Field size and type of venue

The 375 playing fields for which size could be estimated ranged from a minimum of 1,600 sf to a maximum of 156,800 sf. Seventy-five of the fields (19%) were at indoor sports venues, most of which were small, less than regulation-size fields at private sports facilities.

Tonnage and volume of materials

The tonnage and volume of currently installed synthetic turf fields are a projection of the waste that will be generated from these fields over at least the next decade, before they must be replaced. According to the 2017 STC document, “Depending on its usage, exposure to intense sunlight, maintenance and other factors, a synthetic turf sports field will last 8-10 years before reaching the end of its useful life.”(p.3).

The 378 fields for which field size were available amount to:

- 74,019 tons of mixed plastic carpet and infill;
- 134,839 cubic yards of infill, the equivalent of 4,495 30-yard dumpsters; and
- 26.7 million square feet (612 acres) of mixed plastic carpet.

End of life and disposal

The inventory did not attempt to record fields that have been replaced, or whether any of the components of discarded fields were reused, repurposed, recycled, stockpiled, landfilled, or incinerated. Owners of fields that had been replaced generally are only aware that a contractor removed the fields; they are unlikely to know the destination or processing of the removed materials. In a few cases, a contractor was asked about the disposal of a removed field, but the information was not provided.

Conclusions

There are at least 398 synthetic turf fields installed in Maryland as of January 1, 2023. They represent a significant amount of waste over the next decade as they are replaced, and even more fields are planned. There are limited options for disposal of this waste, much of which cannot be recycled or incinerated, and it would take up significant space in the state’s landfills. In neighboring states (Pennsylvania, Virginia), synthetic turf waste has been stockpiled or dumped. At present, there is no information available to the public on the disposition of Maryland synthetic turf fields that have been removed, nor is there any requirement to document their reuse, recycling, or disposal.

It required considerable effort to document the existence of these fields, and considerably more effort to obtain basic information like the year of installation and field dimensions, which are still incomplete. *In the absence of a mandated, publicly disclosed chain of custody it will be difficult for the public or for state authorities to track the existence of synthetic turf fields and their proper disposition at the end of life.* A chain of custody would ensure transparency on the

disposition of synthetic turf and infill – whether recycled, reused, repurposed, or landfilled – and serve as a strong disincentive for improper disposal.

ACKNOWLEDGEMENTS

We are grateful to the following volunteers from the Maryland Sierra Club Zero Waste Team for collecting the information that made this inventory possible: Martha Ainsworth, Michael Brandt, Thomas Brewer, Bente Cooney, Cindy Dillon, Kim Gross, Kerri Hesley, Marie LaPorte, Susan McDonald, Kathleen Michels, Carolyn Parsa, Abigail Snyder, Patricia Soffen, Terry Stakem, and Paige Stevens



P.O. Box 278
Riverdale, MD 20738

Synthetic Turf Fields and Estimated Waste in Maryland, by County, as of January 1, 2023

County	Total Fields	Distribution by ownership					Total Tonnage (carpet & infill)	Area of carpet (square feet)	Volume of infill (cubic yards)
		Public schools	Public parks	Private schools	Private clubs	Other			
Allegany*	4	3	0	0	1	0	712.8	259,200	1,296
Anne Arundel*	43	22	6	8	7	0	9,783.7	3,557,123	17,786
Baltimore City*	40	10	6	19	5	0	7,648.7	2,856,849	14,284
Baltimore County*	65	25	12	22	6	0	11,896.6	4,217,409	21,087
Calvert	1	0	0	1	0	0	22.8	81,000	405
Carroll	6	1	0	0	5	0	568.7	206,810	1,034
Cecil	5	2	3	0	0	0	1,138.2	413,900	2,070
Charles	1	1	0	0	0	0	264.6	108,924	545
Frederick*	20	9	4	4	3	0	3,414.4	933,817	6,208
Garrett*	2	2	0	0	0	0	n.a.	n.a.	n.a.
Harford*	28	12	3	3	10	0	4,936.6	1,795,114	8,976
Howard	46	13	16	1	16	0	9,190.4	3,341,964	16,710
Kent	1	1	0	0	0	0	313.7	114,085	570
Montgomery*	64	18	7	20	19	0	10,666.5	3,878,727	19,394
Prince George's	40	17	6	4	6	7**	8,617.0	3,133,452	15,667
Queen Anne's	2	2	0	0	0	0	367.5	133,650	668
St. Mary's*	11	4	6	1	0	0	1,776.7	646,060	3,230
Washington	3	1	0	2	0	0	683.3	248,479	1,242
Wicomico	13	4	4	0	5	0	1226.1	445,837	2,229
Worcester	3	3	0	0	0	0	790.7	287,515	1,438
TOTAL	398	150	73	85	83	7	74,019.0	26,659,915	134,839

*The dimensions of 20 fields were not available: Allegany (1); Anne Arundel (2); Baltimore City (1); Baltimore County (6); Frederick (2); Garrett (2); Harford (1); Montgomery (3), and St. Mary's (2). The tonnage, carpet area, and volume of infill could not be estimated for these fields and are not included in the table.

**Six fields are a public-private partnership (county owns the land, private foundation owns & runs the fields, Parks & Rec sports teams have access year round); one is owned by the Prince George's County Police Department.

Source: Maryland Sierra Club Chapter, Zero Waste Team.

Founded in 1892, the Sierra Club is America's oldest and largest grassroots environmental organization. The Maryland Chapter has over 70,000 members and supporters, and the Sierra Club nationwide has over 800,000 members and nearly four million supporters.

Exhibit 2 :
Synthetic Turf from Richard Montgomery High School
sent to a site on Bird Creek in White Marsh, Maryland



Photos courtesy of Susan Loftus and Amanda Farber.

CHAIN OF CUSTODY HB 299 SENATE WRITTEN TESTIMONY.p

Uploaded by: Mary Lehman

Position: FAV

DELEGATE MARY A. LEHMAN
Legislative District 21
Prince George's and
Anne Arundel Counties

Environment and Transportation
Committee



The Maryland House of Delegates
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THE MARYLAND HOUSE OF DELEGATES
ANNAPOLIS, MARYLAND 21401

HB 299 – ENVIRONMENT – SYNTHETIC TURF– CHAIN OF CUSTODY

SUPPORT

GOOD AFTERNOON CHAIRMAN FELDMAN, VICE CHAIRWOMAN KAGAN AND ESTEEMED MEMBERS OF THE COMMITTEE. I AM REQUESTING FAVORABLE CONSIDERATION OF HB 299, A BILL CREATING A CHAIN OF CUSTODY REPORTING SYSTEM FOR SYNTHETIC TURF PLAYING FIELDS.

THIS IS MY FIFTH YEAR WORKING ON LEGISLATION THAT WILL DETERMINE WHERE TURF PLAYING FIELDS GO WHENEVER THEY ARE MOVED; MOST OFTEN THIS WILL BE AT THE END OF THE LIFE OF A FIELD. THAT IS TYPICALLY WHEN THEY ARE 8-10 YEARS OLD. THE ENVIRONMENT AND TRANSPORTATION COMMITTEE PASSED THE BILL AMENDED IN 2022 AND IT PASSED THE FULL HOUSE. THE SENATE EHEA COMMITTEE NEVER VOTED ON THE HOUSE BILL OR THE SENATE CROSS-FILE. THIS YEAR, THE HOUSE PASSED THE BILL WITH BIPARTISAN SUPPORT, 103-31.

HB 299 REQUIRES OWNERS AND MANUFACTURERS OF SYNTHETIC TURF FIELDS, WHICH INCLUDE THE PLASTIC CARPETING, INFILL MATERIAL AND SHOCK PAD, TO REPORT TRACKING INFORMATION TO THE MD DEPT. OF ENVIRONMENT FOR

PUBLICATION ON ITS WEB SITE. INITIALLY, THIS WILL MEAN THAT OWNERS WILL REPORT WHERE FIELDS ARE ALREADY INSTALLED. THIS WILL INCLUDE STREET ADDRESS AND LOCATION OF THE FIELD, CUSTODIAN OF THE FIELD, BRAND OF FIELD, SIZE IN SQUARE FEET AND WEIGHT, AND THE DATE IT WAS INSTALLED.

A GROUP OF DEDICATED VOLUNTEERS HAS CONDUCTED A TURF INVENTORY ACROSS THE STATE OVER THE PAST TWO YEARS. THE INFORMATION WAS NOT EASY TO OBTAIN AND DOES NOT GIVE AN ENTIRELY COMPLETE PICTURE OF TURF PLAYING FIELDS IN MARYLAND, BUT WE KNOW OF ABOUT 400. THE REPORTING REQUIRED IN HB 299 WILL CLARIFY THAT NUMBER. EACH OF YOU HAS RECEIVED A PACKET THAT INCLUDES THE SPREADSHEET OF KNOWN FIELDS. THE FIELDS IN THE COUNTIES YOU REPRESENT ARE HIGHLIGHTED.

IF THE SYNTHETIC TURF FIELD IS REMOVED AFTER THE CHAIN OF CUSTODY INFORMATION IS ESTABLISHED, THE NEW CUSTODIAN WILL REPORT TO MDE THE NEW LOCATION AND STREET ADDRESS, NAME AND CONTACT INFORMATION OF THE TRANSPORTER, THE SIZE AND WEIGHT OF THE FIELD, AND HOW IT IS BEING USED AT THE NEW LOCATION, WHETHER THAT'S RECYCLED, PROCESSED FOR DISPOSAL, OR USED TO REPLACE ANOTHER PLAYING FIELD.

THIS BILL IS ESTABLISHING A TRANSPARENT REPORTING SYSTEM AROUND THE MOVEMENT AND DISPOSAL OF SYNTHETIC TURF FIELDS, WHICH POSE AN ENORMOUS SOLID WASTE CHALLENGE. BY FINDING OUT WHERE THESE FIELDS ARE NOW AND WHERE THEY GO AT THE END (AND OCCASIONALLY IN THE MIDDLE) OF THEIR LIVES, THERE WILL BE GREATER PUBLIC INFORMATION AND AWARENESS

THAT HOPEFULLY WILL LEAD TO INCREASED OPPORTUNITIES FOR REUSE,
RECYCLING, REPURPOSING AND RESPONSIBLE DISPOSAL.

AMENDMENTS: THERE ARE FOUR FRIENDLY AMENDMENTS THAT SHOULD HAVE BEEN SUBMITTED. THREE OF THE CHANGES WERE REQUESTED BY THE MD ASSOCIATION OF COUNTIES ON BEHALF OF ITS RECREATION MEMBERS. THEY ARE MOSTLY CLARIFYING AMENDMENTS AND ALLOW FLEXIBILITY AROUND THE WEIGHT OF FIELDS ALREADY IN THE GROUND AND ESTABLISH A MINIMUM SIZE OF THE FIELDS TO BE REPORTED. A SINGLE AMENDMENT REQUEST FROM MDE ASKING THAT PENALTIES BE ADMINISTRATIVE RATHER THAN CIVIL AS CALLED FOR IN THE BILL.

MR. CHAIRMAN, I BELIEVE A CHAIN OF CUSTODY APPROACH IS A WORKABLE POLICY FOR BOTH SYNTHETIC TURF FIELD OWNERS AND MANUFACTURERS. IT REPRESENTS ACCOUNTABILITY AND TRANSPARENCY AROUND WHERE SYNTHETIC TURF PLAYING FIELDS EXIST WITHIN THE STATE'S BOUNDARIES DURING ANY PHASE OF THEIR LIFE CYCLE. THANK YOU AND I URGE A FAVORABLE REPORT.

#####

HB0299-FAV-DTMG-3-23-23.pdf

Uploaded by: Olivia Bartlett

Position: FAV



Olivia Bartlett, DoTheMostGood

Committee: Senate Education, Energy and the Environment

Testimony on: HB0299 - Environment – Synthetic Turf and Turf Infill – Chain of Custody

Position: Favorable

Hearing Date: March 23, 2023

Bill Contact: Delegate Mary Lehman

DoTheMostGood (DTMG) is a progressive grass-roots organization with members in all districts in Montgomery County as well as several nearby jurisdictions. DTMG supports legislation and activities that keep all residents healthy and safe in a clean environment and that address equity for all residents in our communities. DTMG strongly supports HB0299 because it will provide transparency about disposal of toxic used synthetic turf and turf infill for synthetic turf fields.

Synthetic turf fields are made from rolls of plastic “grass” blades weighed down and filled in with hundreds of thousands of pounds of “infill” made from ground up used tires, silica sand, and/or alternative plastic particles. The plastic “grass” contains PFAS and other toxins and ground up tires also contain multiple toxins. Each synthetic turf playing field contains about 200 tons of toxic mixed plastic waste: approximately two acres of plastic carpet with infill, typically from about 40,000 shredded waste tires or other plastic infill. However, we don’t even know how many synturf fields there are in Maryland or what happens to them or their toxic waste.

The removal and replacement cycle for synthetic turf fields is typically every six to ten years. This results in a huge amount of toxic waste. There is no recycling of synthetic turf in US, and local, national, and international media outlets have covered the growing problem of synturf waste. Anne Arundel, Prince George’s, and Montgomery County municipal solid waste facilities report they would decline used synthetic turfs due to volume and weight. There are also no state or federal regulations for safe disposal of synthetic turf or its infill, and there are many documented examples of irresponsible disposal – including dumping the material in lower-income communities. In a 2019 Maryland legislative hearing on disposal of synthetic turf, the president of the leading trade group, the Synthetic Turf Council (STC), acknowledged that there are no laws or regulations regarding the disposal of synthetic turf. The STC itself recommends end-of-life chain of custody certification and describes the disposal issue as “enormous” and “challenging.”

HB0299 will begin to address this important and growing problem by requiring the custodian of each synthetic turf sports and playing field to report relevant information about the synturf field, including its location, manufacturer, size, brand, area, and weight, to the Maryland Department of the Environment (MDE). Similar information will need to be reported each time a synturf field is installed, removed, reused, or disposed. The reporting requirement is a simple, non-burdensome data-point. There is no requirement for any approval from government. Stakeholders and citizens should be able to access a chain of custody showing what happens to the material. The STC’s own guidelines support this

goal. STC and individual firms have long claimed to be good stewards who aim for repurposing, reusing, and recycling. This is their chance to show their commitment to our communities and the environment. The reporting will also assure buyers they are dealing with an honest, transparent, accountable vendor.

Maryland is not alone in facing a growing synturf problem. Enacting HB0299 is an important opportunity to get a handle on the extent of the problem so we can move toward a solution. Therefore, DTMG strongly supports HB0299 and urges a **FAVORABLE** report on this bill.

Respectfully submitted,

Olivia Bartlett
DoTheMostGood Maryland Team
oliviabartlett@verizon.net
240-751-5599

RJR (MTC.MASFMA) HB299 - Letter of Support Senate

Uploaded by: Robert Navolis

Position: FAV



Senator Brian Feldman, Chair
Senate Education, Energy, and the Environment Committee
2 West, Miller Senate Office Building
Annapolis, Maryland 21401

Re: **House Bill 299: Environment – Synthetic Turf and Turf Infill - Chain of Custody – SUPPORT**

March 23, 2023

Dear Chairman Feldman and Members of the Senate E3 Committee:

On behalf of the Mid-Atlantic Field Manager Association (MASFMA) and the Maryland Turfgrass Council (MTC), we write this letter in support of *House Bill 299: Environment - Synthetic Turf - Chain of Custody*.

The Mid-Atlantic Sports Field Management Association (MASFMA) is a non-profit organization that is composed of sports turf field managers and workers from Maryland, Delaware, Washington D.C., and Northern Virginia. As MASFMA members, we partner together to promote education, teamwork, networking, and best practices among our peers and within the Sports Turf Management Industry.

We have partnered with Maryland Turfgrass Council (MTC) this year to bring a more unified front from all aspects of our industry. MTC represents all areas of the turf industry including golf, sports-turf, sod producers, landscape, lawn care and commercial vendors and suppliers.

Over the last couple of years, MASFMA has created and distributed a Best Management Practices (BMP) manual. One of the focuses of the BMP manual is to highlight industry specific practices that ensure the safety of the community, and that environment remains the top priority in our line of work. It covers topics to help both managers and workers keep fields safe and playable for athletes of all ages, from children to professionals.

We believe that this bill is in the best interest of the environment and will provide accountability for proper disposal of materials related to synthetic fields. Many of the products used synthetic fields are non-biodegradable and should be disposed of properly and correctly. We believe this is a very important bill as it will raise overall awareness of the long-term responsibilities of these fields and that when they do reach the end of their life cycle they have to go somewhere.

This bill is an important first step in this process. We supported this bill, as passed, by the House Chamber. For these reasons, we respectfully seek your consideration and support in providing a *favorable* report to House Bill 299.

Thank you,

Rob Navolis

Robert Navolis – Treasurer – MASFMA

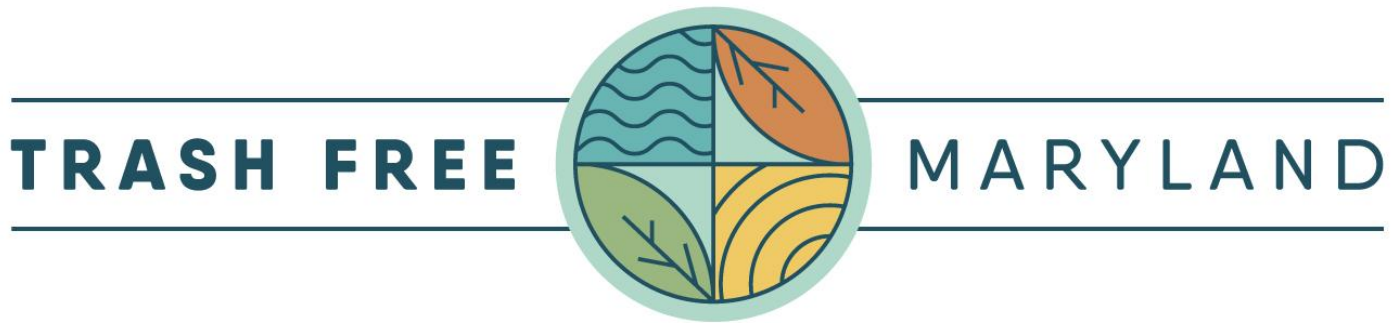
Patrick Coakley

Patrick Coakley – Vice President - MTC

HB299 Support Trash Free Maryland .pdf

Uploaded by: shari wilson

Position: FAV



Bill: HB 299

Date: March 22, 2023

Position: Support

HB 299 –Environment - Synthetic Turf - Chain of Custody

Dear Chair Feldman, Vice Chair Kagan and Members of the Education, Energy and Environment Committee:

We enthusiastically support HB 299. Monitoring, designing and managing solid waste more efficiently is a key strategy to reduce greenhouse gas emissions. To do this efficiently and effectively, the State needs to know what is in our waste stream. Synthetic turf fields are a notable component of the waste stream because disposal options are limited. The size and weight of the materials makes them unsuitable for many conventional disposal options.

Tracking field installations will help ensure the materials are properly disposed of at the end of their useful life and increase the probability that alternatives for disposal can be developed. Quantifying the volume of material is a basic first step to developing better disposal options. This bill improves solid waste stream information available to local governments and the State. All waste stream data helps ensure improved waste management.

This is one of those rare instances where we have an opportunity to take steps to manage a category of waste *before* it becomes a littering or dumping problem.

Thank you for your consideration. We respectfully urge your favorable support.

Trash Free Maryland

Contact: Shari Wilson (shari@trashfreemaryland.org)

FOSC testimony HB0299 synthetic turf chain of cust

Uploaded by: sheldon fishman

Position: FAV



Committee: Education, Energy, and the Environment Committee
Testimony on: HB299- Environment-Synthetic Turf -Chain of Custody
Organization: Friends of Sligo Creek
Submitting: Sheldon Fishman, Advocacy Member
Position: Favorable
Hearing Date: March 23, 2023

Dear Chair Feldman and Committee Members:

Thank you for allowing our testimony today in support of HB299. My name is Sheldon Fishman. Our four children represented their public schools in interscholastic sports and I was an active member of the schools' booster clubs. For example, here is a picture of our oldest daughter pitching for Einstein High School against our younger daughter batting for Blair High School.



Today I am representing Kit Gage and Friends of Sligo Creek.

Friends of Sligo Creek, representing about 1400 members in Montgomery County and Prince George's County, urges you to vote favorably on HB299.

Friends of Sligo Creek, or FOSC, is a nonprofit community organization dedicated to protecting, improving, and appreciating the ecological health of Sligo Creek Park and its surrounding watershed.

We support transparency and accountability in disposal of this significant solid waste that will adversely affect our waterways and groundwater when not disposed of appropriately. A Chain of Custody system will also be a support for responsible recycling when that becomes available since the fate of the field will become transparent.

This bill would require manufacturers and owners of synthetic turf and turf infill to report chain of custody of the synthetic turf and infill for reuse, recycling, or final disposal. Currently there are no such regulations despite the fact that each synthetic turf field contains tens of thousands of pounds of chemical-laden plastic and hundreds of thousands of pounds of granulated infill (usually tire waste, or alternative infills, and silica sand). According to the Synthetic Turf Council, the industry's leading association, one thousand deconstructed fields per year in the U.S. represent 80 million square feet of synthetic turf carpet weighing 40 million pounds and 400 million pounds of infill.

Synthetic turf's typical lifespan is a period of 8-10 years. Used synthetic turf materials may be landfilled, incinerated, repurposed or dumped in communities which then must deal with the waste. The synthetic component materials that make up artificial turf carpet systems contain known aquatic and human toxins, carcinogens, endocrine disruptors, heavy metals, carcinogens, and immune disruptors such as PFAS, or "forever chemicals."

Several Maryland municipal waste facilities do not accept the volume, weight, and mixture of synthetic turf which then leads to illegal dumping. Numerous examples of irresponsible disposal exist including dumped or stockpiled material in lower income communities. In 2018, a synthetic turf field from Richard Montgomery High School in Montgomery County was

dumped near the Bird River in Baltimore County. Another synthetic turf field (Walter Johnson HS) was reportedly shipped to an uncertain fate halfway around the world in Malaysia.

The technology for recycling synthetic turf, which involves separating the plastic grass and backing from the sand and rubber infill is complicated and has not been fully developed, so when a synthetic turf owner wants to do the right thing and tries to recycle, they have limited options.

Right now, municipalities and jurisdictions in Maryland, as well as other regions across the country where these plastic carpets are dumped, are the same jurisdictions that are forced to deal with the environmental and physical mess. They have no way of knowing who dumped the used synthetic turf without a chain of custody tracking system, as proposed in HB299.

A Chain of Custody system will also be a support for responsible recycling when that becomes available since the fate of the field will become transparent and customers will want to do the right thing.

Our environment, waterways and municipalities suffer from inappropriate disposal of the plastic carpeting and infill from synthetic turf. Stakeholders have the right to know what happens to materials and hold those responsible for the materials accountable through a documented chain of custody reporting. Transparency and accountability regarding synthetic turf disposal must be required.

Friends of Sligo Creek supports HB0299 and recommend a **FAVORABLE** report in committee.

Sheldon Fishman
Member, Advocacy Committee

Kit Gage
Chair, Advocacy Committee, advocacy@fosc.org
Friends of Sligo Creek, www.friendsofsligocreek.org
PO Box 11572
Takoma Park MD 20913

HB299 - Synthetic Turf Chain-of-Custody Legislatio

Uploaded by: Tom Taylor

Position: FAV

There are a lot of questions about health, safety and end-of-life disposal for synthetic turf. This chain-of-custody legislation is a good step toward accumulating data that can help answer these questions.

Response to House Bill 299.pdf

Uploaded by: Jeffrey Graydon

Position: UNF

Response to House Bill 299
March 22, 2023
Jeffrey K. Graydon
jgraydon@princeton.edu

Among the greatest values of our Legislative system is public input permitting a wide range of views to be taken into consideration as a bill is considered. Thank you for the opportunity to comment on House Bill 299 Environment – Synthetic Turf – Chain of Custody

I have read the proposed bill and am opposed to the bill in its current form and offer the following in support of my opposition:

Definitions:

“Custodian” – a person or **entity**...

“Producer” – a person or **entity**... that supplies turf that is installed within the State.

Turf is produced by numerous suppliers and tufting is but one element of construction, backings and coatings too are essential elements of a turf system. The proposed definition of producer fails to address the various elements of turf. The proposed reference to license or trademark brings no value to the proposed bill. Imports present greater challenges for compliance and enforcement than domestic firms.

“Synthetic Turf” – the majority of but not all synthetic turf products are “tufted”

Not all synthetic turf is used in landscape including installations of over 5000 sq.ft. Carpeting has many of the same attributes as synthetic turf and is not addressed in HB299. Carpeting may be tufted, has backing systems, coatings and may be installed both indoors and outdoors.

“Turf Infill” – the definitions are missing. Infill is typically the largest single component

of a synthetic turf system and may contain various components including synthetic and naturally occurring components to provide playability, impact attenuation and ballast. Infills are thoroughly evaluated, tested and installed within a turf system to provide appropriate characteristics for the particular playing surface based on the use of that surface.

9-2502 Notice by the “Custodian”

The reporting requirements include reasonable data including:

Name and address of the Owner

Geographical address of the location of the turf

The area of the Synthetic turf

The value of brand and installer and suggest the weight requirement is ambiguous and vague. Is it the face weight, infill component weight, shipping weight?... It is onerous for an owner to be expected to gather this information and does not consider subsequent additions of infill that may be required and serves little purpose.

When replacing turf numerous expanding avenues are becoming more widely available including repurposing, recycling, and disposal in landfills. End of Life of product has been a high priority for industry members and the rapidly development of solutions include better methods of turf removal, better packaging and transportation options, greater recycling and finding alternate means to separate product into useful components for use again into a synthetic system or as raw material into other products.

The concept of Chain of Custody is not by itself a concern but legislation without a thorough understanding and balance of needs would lead to a bill that would serve both the public and not be a burden to producers and owners of synthetic fields that provide opportunities for not only recreation but for storm water management that are difficult with natural grass systems. Synthetic turf requires neither fertilization nor pesticides and maintenance is generally a grooming process that distributes infill evenly.

I ask that before House Bill 299 moves ahead that consideration be given to discussing options and opportunities with industry groups such as the Synthetic Turf Council. I too offer to sit with legislative or technical representatives to assist meeting the goal of Chain of Custody without burdening owners, producers, installers or recyclers unnecessarily.

HB299 Senate testimony.pdf

Uploaded by: Kenneth Kirton

Position: UNF



RECYCLED
RUBBER COALITION

March 22, 2023

Maryland General Assembly
Education, Energy, and the Environmental Committee
Senate Office Building
Annapolis, MD 21401

Dear Chair Feldman, Vice Chair Kagan, and members of the Education, Energy, and the Environmental Committee,

My name is Stratton Kirton and on behalf of the Recycled Rubber Coalition (RRC), I am here today in opposition to House Bill 299.

By way of background, the Recycled Rubber Coalition is a national organization representing rubber recyclers and companies that use recycled rubber. Our coalition is a resource for policymakers and the public on the responsible and safe uses of recycled rubber. Additionally, we work with state and local policymakers to discuss ways we can increase the reuse and recycling of rubber tires.

The Recycled Rubber Coalition and the entire rubber recycling industry have made great strides promoting the reuse and recycling of rubber materials—and one of the materials rubber is frequently recycled into is synthetic turf. As an industry whose primary function is ensuring reuse, the recycled rubber industry greatly supports the synthetic turf industry's longstanding commitment to promoting the responsible reuse and recycling of turf fields.

Our primary change to the bill would be to increase the minimum square footage threshold to 50,000 sq ft. If the intention of the legislation is to capture what reasonable people would recognize as a sports field, increasing the square footage minimum would do so, while not subjecting non-sports fields to these regulations. By using the Sierra Club's own list of synthetic turf fields in Maryland from 2022, a 50,000 square foot minimum would capture 75% of the instances of synthetic turf they documented.

For reference, the playground near the house where my son grew up—which is modest in size—measures at 9,000 square feet, so well above the threshold as passed by the House of Delegates, even though it is most decidedly not a sports field.

Additionally, from a recycling perspective, we have concerns that the bill as written would subject owners of modestly sized secondary-use turf to the reporting requirements and fines set forth in this legislation, which could potentially lead many to decide against re-use of turf and lead to more turf in landfills, which I think we can all agree is what we are trying to avoid.

We cannot support the bill as it is currently drafted, but with this bill and future relevant legislation, we would love to work with any members on policy recommendations that continue to improve tire recycling in Maryland, as we recently outlined in [our white paper](#).

Thank you for your consideration,
Stratton Kirton
The Recycled Rubber Coalition

HB 299 STC Senate Testimony-Mar232023_final.pdf

Uploaded by: Melanie Taylor

Position: UNF



March 22, 2023

Maryland General Assembly
Education, Energy and Environment Committee
Senate Office Building
Annapolis, MD 21401

Written Testimony in opposition of: House Bill No. 299:

Submitted by:
Melanie Taylor
President and CEO
Synthetic Turf Council (STC)
2331 Rock Spring Road, Forest Hill, MD 21050

Dear Chair Feldman, Vice Chair Kagan and members of the Education, Energy and Environment Committee

My name is Melanie Taylor and on behalf of the Synthetic Turf Council (STC), I am writing in opposition to House Bill No. 299 as we discuss the primary reasons below.

As a 501(c)6 trade association representing the synthetic turf industry, the STC office is headquartered in Harford County, Forest Hill, Maryland. Founded in 2002, the STC represents over 200 members and promotes industry excellence through voluntary guidelines, certifications, and other learning platforms. Our membership includes representatives from every stage of installing and maintaining a turf field, including builders, design professionals, civil engineers, testing labs, maintenance providers, manufacturers, suppliers, installation contractors, infill and shock pad suppliers and specialty service companies.

The STC has two primary issues with House Bill 299, as amended:

1. **Definition of “custodian”** – As written, a custodian includes "a person that: owns or is in control of synthetic turf". We recommend a clearer definition of custodian as the owner of the turf system to help narrow the responsible parties so that when a new field is installed, only one party reports it one time.
2. **Threshold of 5,000 square feet minimum** – As we mentioned in the House committee hearing, we believe sports fields average at 75,000 square feet and playfields 30,000 to 50,000 square feet. Anything below that would include landscape (residential) and commercial applications that may have lifespans up to 15 and 20 years.



The STC is committed to protecting the environment and currently provides the latest guidance and resources on the best ways to reuse and/or recycle each component of a synthetic turf field. We are happy to provide counsel on such bills that would further codify established industry guidelines that effectively encourage sustainability and proper end-of-life handling.

Thank you for your consideration.

Melanie Taylor
President and CEO
Synthetic Turf Council (STC)
www.syntheticurfCouncil.org

MGA HB 299 (1).pdf

Uploaded by: Peter Lord

Position: UNF

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Maryland General Assembly
Environment and Transportation Committee
House Office Buildin

Written Testimony in opposition of : House Bill No. 299

This bill would “target” the Landscaping Industry in Maryland when , in fact, it seems to me that your concerns are for the environment in general . The potential for damages from the handling of turf related products is not any different from many other Products/Industries. If this bill were to pass and become law, what’s next ? It would have to be the chain of custody for all construction projects to include home remodeling to address the many other products that are, in many cases, much more toxic and concerning, like:

Flooring materials, tiles with asbestos.
Painted masonry products, possibly with lead paint
Asphalt shingles, oil based and will last forever in the environment
Carpeting
Drywall materials, on and on

Where would this thinking stop ?

I think the State of Maryland already has this potential challenge under control with our Transportation Agency.

As an owner of one of the largest turf companies in the State, we have quite a few dump trucks in our line of tools. We have first hand experience with one of our trucks leaving a job site that is muddy from bad weather and driving down the road throwing mud everywhere for a quarter mile, being issued a ticket then or later and on a few occasions being issued a “stop work” order. With everyone having a cell phone/ camera, we would have to be crazy to think we could possibly get away with this. Thus, this speaks to the cartage of materials in and out of a job site. Carrying materials into a job is a very clean operation as the “turf” is rolled up just like new rolls of carpeting. Therefore, you are only talking about removing an existing turf project. If and when an installed product

needs to be replaced, that would be the time to make sure it ends up either in an acceptable recycling property or reused for another job.

Note: We use a company, Best Plus Lumber who recycles all of our scraps and discards and make perimeter boards that we reuse.

We also install about 750-1000 jobs per year and have replaced maybe two in the last 10 years. Please keep in mind that our Turf products DO NOT REQUIRE RUBBER INFIL.....

Reusing turf is not very popular and typically goes to animal shelters as a donation. Either way, this might be the "trigger" to feel assured that our environment remains as safe and clean as it can. But, are you really worried about 2 jobs in 10 years ?

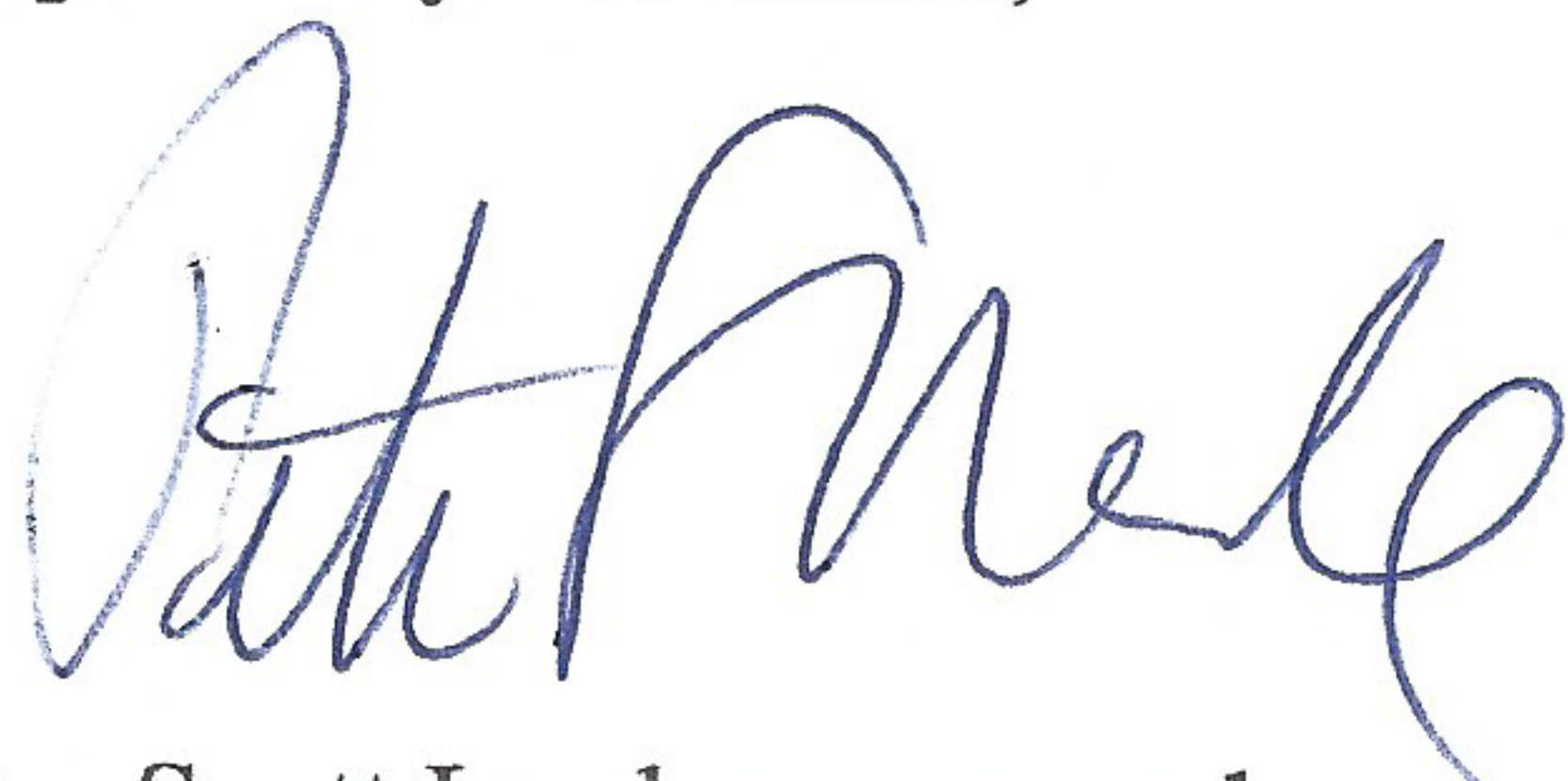
The bill also references an approximate cost initially of approximately \$ 52,000.00 the first year. I would challenge this as it doesn't reflect any new software or hardware required, no health insurance nor auto expenses. I would suggest that you are looking at approximately \$ 100,000.00. How will Marylanders' feel about this unnecessary cost ? Do we need to add more unnecessary costs to our budget ?

When I think about this bill putting the onerous on us, potential \$5000.00 fine, costs to report, being kept in the loop well after a job is completed and paid for, then possibly be drawn into a conflict because our homeowner had a friend of his cousin make alterations to our install.....

The last point I want to make. Your language in the bill refers several times to "sports and playing fields". A typical sports and playing field is approximately 70,000 Square Feet. Just fine tuning this bill to reflect 70,000 SF would help to minimize the added costs in many ways, not to mention that our local building inspectors could handle that without much added expense.

We are one of the largest turf companies in the State and we oppose this bill as it unfairly targets our industry, overlooks a plethora of other industries, it is redundant and a waste of tax payers money.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Peter Scott Lord". The signature is fluid and cursive, with the first name "Peter" being the most prominent.

Peter Scott Lord, owner and manager

Cc: Kaitlyn Lord, President