



House Bill 457 – Environment - Synthetic Turf - Chain of Custody

Education, Energy and the Environment Committee, March 20, 2024

SUPPORT

Submitted on behalf of Safe Healthy Playing Fields, Inc.

Submitted by Diana Conway, SHPFI President

Good afternoon Chair Feldman, Vice Chair Kagan, and honorable members of the committee,

Thank you for this opportunity to submit written testimony concerning a key priority of **Safe Healthy Playing Fields Inc.** (SHPFI) for the 2024 legislative session.

SHPFI is a national all-volunteer non-profit based in Maryland. We work to inform communities and policy makers about the problems with synthetic turf fields and the benefits of high-quality, high-use natural grass fields.

SHPFI urges the passage of HB457. The purpose of the bill is to assure that the rising waste stream from used synthetic turf fields is managed transparently and responsibly for the protection of communities, and of our water and soil. The mechanism is a simple chain of custody tracking system.

Like its predecessor, HB457 directs the Maryland Department of the Environment (MDE) to implement a chain of custody reporting structure. When enacted, it will require the custodian of a synthetic turf sports field to report to MDE the field's location and size. When it is time for the field to be removed, the custodian informs MDE and reports who the next custodian is. There are no fees or approvals associated with this tracking system. Whenever a field is moved, each custodian simply points the way to the next link in the chain of custody, and that party becomes the relevant custodian.

This seemingly procedural and bureaucratic measure is an important tool to address the public health concerns posed by the volume and the toxicity of used synthetic turf fields.

HB457's tracking system for synthetic turf fields is a low-burden strategy to prevent toxic contamination. In these tight budget times, it is even more important to embrace the fiscal prudence of preventing contamination versus costly and imperfect remediation after the fact. In a world beset by bad news on the environmental and public health fronts, policy makers like this committee must set the bar: What's an unavoidable burden on our health and our environment for critical needs, and what health and environmental risks can we minimize just by being more attentive to ?

This model of transparency and accountability is practiced across our economy, from ubiquitous Amazon deliveries, to the handling of sensitive legal or financial documents. Moreover, HB457 proposes a remarkably low-burden version of this well-understood concept: 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 eight to ten 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 [over 430 fields](#) but we know many remain uncounted, and several counties have not been included at all yet. The U.S. inventory is estimated to be [approximately 15,000 sites](#), with many having seen one or more replacement cycles. Each of these fields represents about two acres of plastic carpet, plus approximately [one billion plastic blades](#) that are glued or stitched to the backing, plus the infill – typically 40,000 pulverized [waste tires](#) required to cushion the surface. On a replacement cycle of eight to ten years, each of the existing fields becomes an ongoing source of plastic waste and microplastic contamination that cannot be ignored.

Yet as [this committee has heard before](#), there is [no regulation for the disposal of synthetic turf](#) when fields reach the end of their useful lives.

Contents: The second reason we need HB457 is that synthetic turf is loaded with an undisputed and [daunting list of toxic components: neurotoxins and heavy metals like lead, known human carcinogens, endocrine disruptors](#), plus the highly toxic [PFAS 'forever chemicals'](#), and the more recently-identified [6PPD quinone that is proving 95%+ lethal to endangered coho salmon](#) along the U.S. West Coast. It seems unlikely that coho salmon are unique in this sensitivity. While we won't stop using tires tomorrow, 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, HB457 presents an opportunity for reputable contractors to distinguish themselves to buyers, by assuring their adherence to the chain of custody requirements when removing a field, so that a parks system or school district isn't [embarrassed](#) to find their old field is now a neighborhood's contamination and waste problem.

By injecting transparency into the process, HB457 will create accountability for the responsible and verifiable disposal of used synthetic turf fields in Maryland. Our communities deserve this.

We ask for your support for HB457 and strongly urge a favorable Committee report.

Respectfully submitted,
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Safe Healthy Playing Fields Inc.

