## To Whom It May Concern,

I share these comments today in **support** of *HB0857* - *Synthetic Turf and Turf Infill* - *Chain of Custody and Reuse,* Sponsored by Delegate Lehman.

The State of Maryland has a great opportunity with HB0857, to serve citizens and communities by making manufacturers and purchasers of synthetic turf products properly account for the full life cycles of these products. Synthetic turf without chain of custody burdens our neighborhoods and our environment with no oversight or restraint and no gauge to encourage better decision making. Proper oversight of synthetic turf waste produced, its outcome at end of life, and consideration of claims made about a given waste product being "recycled" or "recyclable" can prevent health and environmental consequences before they occur. Some pollutants we cannot recover after they are dumped into our land and water. Many pollutants, like forever chemicals in synthetic turf, will damage people and environment for generations to come. Common sense legislation like HB0857, requiring chain of custody documentation, puts the burden of the synthetic turf product onto the proper, responsible entities, those who manufacture and profit from it.

Please see the attached article:

**Hidden gotcha in artificial turf installations** by Pete Myers - Dec 04, 2019 <u>ehn.org/hidden-gotcha-in-artificial-turf-installations-2641507579.html</u>

This article shares some details about our experience in Albemarle County, Virginia, in 2018-2019. When the University of Virginia decided to replace two synthetic turf fields, no one accounted for where the waste synthetic turf was going. UVA did not manage its contractor or care about the forever chemicals in the synthetic turf's plastic or the cancercausing agents in its crumb rubber. The discarded synthetic turf was rolled up, driven truckload after truckload into rural Albemarle County, and dumped on a hillside just up from a stream.





Images courtesy of Virginia Department of Environmental Quality

When regulators first noticed it, the landowner had it moved to another more private site, where it was partially buried. When it was found again a few months later, the landowner was cited, and the portion of the waste synthetic turf that was recoverable was taken to a landfill. **199 tons of it**.

These pictures only show bits and pieces that were discovered. But piles of discarded synthetic turf fields are

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building up on industrial lots, behind businesses, and on country sites away from prying eyes, across the United States. I note that some states and the District of Columbia have recently shipped waste synthetic turf to Virginia to dispose of it. We don't want your waste here. We need everyone to better manage the products they manufacture, and those they purchase, and to not accept cheap assurance that any of it is recyclable, when most often it is ending up in piles like those above, leaching harmful chemicals into ground and surface waters.

On that note, what does it mean to be recyclable? Is it just that a product can be used again? That's a nice idea, but if the original product contains chemicals and compounds that damage people, and those chemicals and compounds will remain in every form the product takes, is that kind of recyclability truly a good thing? The answer is No, and someone has to account for that. It shouldn't be left to the citizens living next to the dump site who end up with poisoned well and reservoir water.

Many marketers of synthetic turf will come on strong about it being made from recycled products and that it is recyclable when you are done with it. Traditional crumb rubber infill is indeed made from discarded vehicle tires. Reuse is good, right? But reuse in this case kicks the can of responsibility down the road. Vehicle tires cannot be disposed of in many traditional landfills because it is recognized that tires contain compounds that no one wants in water. In most places, it is not legal to burn rubber tires b/c of the noxious gases released into the air with burning. Vehicle tires contain a lot of bad stuff, including cancer-causing compounds (carcinogens), so how does grinding them up make a safe playing surface for children? The extruded plastic grass "blades" carry endocrine disruptors with them into every application. Wherever this material is left, it will leach into our groundwater, streams, and reservoirs.

Maryland can do better. HB0857 is a great start. Please lead the way. Help corporations who profit off plastics, rubber, and related products that are the drivers of climate change and pollution to be tied to their products. The sale and the money in their pocket is not the end game. The end game must be healthy and safe communities and responsible product manufacture and disposal, leading to better product availability and choice in the marketplace. We can have healthy and safe sports surfaces too, we just need proper boundaries in place and standards responsive to the very real problems that exist. Full life cycle responsibility by those who make the products and those who use the products are the only ways to manage the long term implications of synthetic turf, the choice to use it and how to manage discarding it.

Thank you for your consideration of and attention to this important matter. Please **vote Yes for common sense and for HB 0857**.

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

## Hidden gotcha in artificial turf installations

ehn.org/hidden-gotcha-in-artificial-turf-installations-2641507579.html

Dec 04, 2019 <u>Pete Myers</u> When school systems, universities and colleges, or local governments choose to install artificial turf fields, they seem all bright, shiny green and clean. How many of those buyers pay attention to the endgame—the disposing of many tons of hazardous waste?

Intrepid <u>reporting by Sharon Lerner</u> at *The Intercept,* in collaboration with scientists at the Ecology Center (Ann Arbor), revealed that the so-called 'forever chemicals'—PFAS (perfluoroalkyl and polyfluoroalkyl substances)—are used in the production of artificial turf. They help in the manufacture of the artificial grass blades, which must be forced through an extruder to achieve the right size and shape. That process goes more smoothly when PFAS chemicals are added to the plastic before the blades are extruded.

'Forever' doesn't mean they stay in the 'grass' blades forever. It means they take a very long time to degrade in the environment. And, rather than staying in the blades, they travel, by leaching and by volatilizing. With surface temperatures of artificial turf on hot, sunny days reaching well above 120 deg F, this traveling shouldn't be a surprise. How much PFAS kids breath in while playing soccer hasn't been quantified.

But the chemicals also take a slow form of transport: Via dump truck to rubbish piles and disposal sites. That's because artificial turf fields used in sports need to be replaced after somewhere between five and 10 years of use. Rip out the old. Lay in the new, again shiny green.

Are PFAS threats to human health? Dr. Linda Birnbaum, just before she retired as the Director of the National Institute of Environmental Health Sciences, <u>concluded that the 'safe'</u> <u>level of PFOA</u> would need to be lowered to 0.1 parts per trillion, 700 times lower than the current EPA standard. And anyone who wants to learn more about this family of chemicals and their impacts on human and livestock health should go see Mark Ruffalo's new movie, <u>Dark Waters</u>, a dark story of how DuPont purposefully hid the chemical's dangers for decades. The movie opens Friday, 6 December, in Charlottesville and theaters around the country.

Industry websites say the used turf can be deposited at any landfill (for example, <u>here</u>). But as concerns about PFAS mount, that's very likely to change.

This issue became personal when I learned that my wonderful County Supervisor, Ann Mallek (White Hall District, Albemarle County, Virginia), had learned of illegal dumping of used turf from the University of Virginia. A neighbor of mine had called her, puzzled by a series of big dump trucks traveling on a dirt road up a nearby mountain. The neighbor told Mallek that the unusual amount of traffic had so surprised him that he had finally stopped one of the drivers and chatted him up.

The driver told him he was carrying used turf from the university but that it was OK, Virginia's Department of Environmental Quality had approved it. This seemed unusual to Ann; she wasn't aware of any legal rubbish dumps up that particular mountain. So she called the university. Her contact there reassured her that DEQ had approved. Then she called DEQ, who knew nothing about it. It was an illegal rubbish dump set up by an enterprising landowner to receive the turf.

After formal notice of violation from Albemarle County, the landowner had the turf hauled away, but a couple of months later it was discovered again, by accident, having merely been shifted to another site on the mountain beside a stream. The County had to get involved again and this time the turf was finally taken to a landfill capable of handling hazardous waste.

All 199 tons of it. From just two soccer fields.

The choice of a hazardous waste disposal site at the time was serendipitous ... PFAS in artificial turf hadn't yet become an issue. And the dramatic nationwide rise in toxicity concerns about the compounds hadn't become a local issue.

In her article cited above, Sharon Lerner tells the story of scientists finding one specific PFAS, PFOS, both in abandoned turf and in stream water adjacent to it near Franklin, Massachusetts. Town officials told her they hadn't known about hazardous chemicals in artificial turf.

We can't allow officials to claim ignorance any longer. Candy Woodall at the *York Daily Record* in Pennsylvania offers one example of the work that needs to be done: The paper did an <u>excellent job exposing the unregulated turf industry</u>, investigating the burdens the industry imposes on the environment and neighbors thanks to the current lack of rules or oversight.

With heightened awareness around the country about the health effects of PFAS, calculations for what artificial turf installations actually cost over their full life-time, including disposal in facilities capable of managing hazardous chemicals, may send a shock through the artificial turf industry and the many schools and sports facilities who want more shiny green stuff.

Pete Myers is founder and chief scientist of Environmental Health Sciences, which publishes Environmental Health News.