

## **HB0299 - SUPPORT**

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### **HB0299 SUPPORT - Environment – Synthetic Turf and Turf Infill – Chain of Custody** February 15 Hearing Before the House Environment and Transportation Committee

Dear Chair Barve and Members of the Environment and Transportation Committee:

**One Montgomery Green (OMGreen)**, a grassroots nonprofit 501 (c) (3) with a mission to catalyze the County's transition to a sustainable economy, facilitate environmental responsibility among businesses, residents, and government, and increase the quality of life for all Montgomery County residents. Every OMG sustainability initiative begins with a foundation of diversity, justice, equity and inclusion woven throughout the process, which reflects the eclectic background and culture of the residents of Montgomery County, MD.

OMGreen **strongly supports the goals and intent of HB0299**, which would require producers of synthetic turf and turf infill to report chain of custody of synthetic turf and turf infill to the Maryland Department of the Environment. The 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 repeated replacement and disposal of each field every decade or less represents a massive amount of material which must be managed and for which there are currently no good management options.

According to data compiled by the Sierra Club, (see the links at: <https://www.sierraclub.org/maryland/disposal-synturf-fields> ) grassroots teams of volunteers have identified 398 synthetic turf fields across Maryland with Montgomery County and Baltimore County having the most (64 and 65) respectively, as of January 1, 2023. There are about 440,000 pounds of waste associated with each field, which typically includes tire crumb, plastic grass, and backing, which means that Montgomery 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 while Montgomery County sends its waste out of county. Synthetic turf from Montgomery County in particular can end up anywhere and for example has ended up being trucked to the banks of Bird River in Baltimore County.

This bill requires a simple, straightforward reporting of the chain of custody of the materials involved in synthetic turf to make sure they are disposed of and can be found and managed as responsibly as possible.

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

[https://cdn.ymaws.com/www.syntheticurfCouncil.org/resource/resmgr/guidelines/STC\\_Guideline\\_for\\_Recycle\\_Re.pdf](https://cdn.ymaws.com/www.syntheticurfCouncil.org/resource/resmgr/guidelines/STC_Guideline_for_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.

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.**

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

[https://football-technology.fifa.com/media/1230/artificial\\_turf\\_recycling.pdf](https://football-technology.fifa.com/media/1230/artificial_turf_recycling.pdf) .

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/](https://www.seattletimes.com/seattle-news/environment/feds-order-owner-of-dam-on-puyallup-river-to-clean-up-spill-from-artificial-turf/)

- 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 currently it is. HB0299 will help ensure more accountable handling of the material. The state and municipalities need to know where this 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 waste.

Thank you,  
Kathleen Michels for One Montgomery Green