

July 18, 2019

Mayor Muriel Bowser
1350 Pennsylvania Ave., N.W.
Washington, DC 20004

cc: DC City Councilmembers

Dear Mayor Bowser:

We are writing on behalf of the National Safe Healthy Playing Fields and the co-signatories below. SHPF is focused on securing safe, responsible playing surfaces for our communities such as grass fields and wood-fiber playgrounds. In those cases where a jurisdiction has installed synthetic turf (synturf) and poured-in-place playgrounds (PIP), we support environmentally responsible, transparent protocols and regulations for disposing of the used synturf and PIP materials.

This letter focuses on the disposal challenges of synturf. While PIP playgrounds are a related problem -- particularly with growing awareness of their elevated lead content -- the staggering volume of used synturf requires urgent attention from your government. That's especially important because of the wave of imminent synturf removals scheduled in Washington, D.C.

Plastic waste is a serious problem for all jurisdictions. Plastic is non-renewable, it contains toxic substances that threaten both human and environmental health, and the sheer physical volume of waste poses unresolved challenges. Synturf fields in particular are a newer and unrecognized source of enormous amounts of plastic waste. Each field is composed of a plastic carpet onto which infill material (typically shredded waste tires) is added. A typical field has 80,000 square feet with 40,000 shredded tires for infill. That means 200 to 250 tons of waste that must be removed and disposed of --- every 5 to 10 years. The infill is particularly problematic since it is difficult to contain, whether on the field during its useful life, or at the disposal site. This is known as 'migration' and is why synturf fields are notorious for their hardness unless they are meticulously tested and maintained.

Regulation has not kept pace with the mounting disposal issues for this volume of toxic waste. Consequently used synturf is dealt with however individual contractors please. Typically it is rolled into huge bales, infill and all, and hauled by truck from one jurisdiction to another where its disposal is uncertain. It may be landfilled, warehoused or simply dumped at unregulated sites, possibly without knowledge of either the sending or the receiving jurisdictions. Instances of inappropriate or unsafe disposal of synthetic turf at unregulated and unsuitable sites have

been reported in this region, around the country and in Europe, highlighting the need for transparency and for tracking the final disposition of all used synthetic turf components.

Synturf removal contractors may tell clients the material will be recycled. That is factually inaccurate. There is no facility in all of North America that is recycling synthetic turf back into synthetic turf or any other product. A single facility, in Denmark, is the only one that is actually set up to do so-- even the synturf industry trade group concedes this. In addition there is no known pipeline of *any* North American-based used synturf being sent to the Danish facility. What is called “recycling” is just finding a place to park the materials, which continue to contaminate the air, soil and water as they disintegrate into plastic debris, dust and micro-debris.

Some removal companies claim to ‘repurpose’ the used synthetic turf. Even if true in a small number of cases, for example in a batting cage or paintball course, such ‘repurposing’ cannot begin to take up the staggering volume of synturf that is being removed across the US every year. Moreover, the tiny amount of material that may be repurposed for such uses will later be removed from that use as well. The claimed ‘repurposing’ merely delays the same outcome while misleading synturf owners and users.

We therefore urge the government of DC to establish transparent regulation for the safe, responsible disposal of its used synturf. These should assure that:

1. Any removed synturf field will have a verifiable chain of custody.
2. Any receiving jurisdiction will be informed, and should inform its residents, of the volume, weight and character of the waste it is receiving.
3. Any receiving jurisdiction will be informed, and should inform its residents, of its obligation to protect the public and the environment from contamination of its air, water and soil.
4. No synturf waste is disposed of in a way that can reasonably be expected to contaminate the receiving jurisdiction’s air, water and soil.

We believe the DC government wants to act responsibly in this matter. The looming issue of disposing of the solid waste generated by each removed DC synturf field makes this matter urgent. Given that the claim of “recycling” cannot be sustained we urge you to increase your oversight of the disposal process used by your contractors and to enhance the transparency of that oversight, as requested by DC residents in this letter:

<https://docs.google.com/document/d/1hpn6gdAYUZxdV6exJkrUA8NIYGWJFD4Doi9tL2alsmc/e/dit?usp=sharing>

We support the request of DC Safe Healthy Playing Fields for transparency in the disposal of synthetic turf and tire-waste PIP playgrounds. We urge the city and its government to take responsibility for this issue and to implement the four policy steps outlined above.

We would welcome the opportunity to provide further information and collaborate with you.

Sincerely,
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DC Safe Healthy Playing Fields



DC Safe Healthy Playing Fields

The Field Fund



Montgomery County Green Democrats



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Non Toxic Neighborhood's Team & Advisors

Non Toxic Neighborhoods

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