

May 1, 2020

Mr. Alex Elvin, General Planner  
Martha's Vineyard Commission  
PO Box 1447  
Oak Bluffs, MA 02557

Re: Martha's Vineyard Regional High School – Athletic Field Improvements  
(Amended DRI # 352)

Dear Mr. Elvin;

My office has been working to address questions regarding the material and end of life issues pertaining to the proposed synthetic turf system we are considering for use at MVRHS. I know you are already aware that we are proposing a woven system, and an organic infill product. This will eliminate the backing materials and recycled rubber (SBR) granules which have been the subject of recent news articles.

Additionally, we have been working with our peers and several leading toxicologists to better understand the use and impact of Per and Polyflouroaklyl (PFAS and PFOS) substances in the manufacturing process. Although these issues have recently been in the news, they are not new discussions within the review of synthetic turf products among those who design and specify these systems. To date, we have received written correspondence from several synthetic turf manufacturers stating that they do not use PFAS or PFOS in their manufacturing process.

Presently, in the United States, the best reference to PFAS and PFOS regulations are contained within the California's Proposition 65 Regulations and the US EPA's Method 537. To be considered for use in the MVRHS project, the following requirements for third party independent testing is being included in our project specifications:

1.06 SUBMITTALS

- A. Submit the following in accordance with the Conditions of the Contract and Division 1 Specifications:
1. The synthetic turf vendor shall provide a statement certifying their products and manufacturing processes, including upstream suppliers, do not use any PFAS chemicals currently listed as part of California's Proposition 65 Regulations or identified as part of US EPA's Method 537 to manufacture the components of its turf field products, including the fibers, backing and any coating materials. This certification must be confirmed through independent, third party laboratory testing of the specified product. Third party test results must be provided in advance of the bid.

Additionally, we have been reviewing the questions regarding the end-of-life of the turf products and recycling of the synthetic carpet. We have spoken with representatives of Greenfields USA, who have just opened a turf recycling facility in the Netherlands and are



committed to opening another facility in the United States within the next 2 years. To help ensure that the synthetic turf installed on Martha's Vineyard is appropriately recycled at the end of its useful life, we have drafted the following requirements which will be included in the project specifications.

#### PART 4 – REMOVAL & RECYCLING

##### 4.01 GENERAL

- A. The Synthetic Turf System Vendor shall be responsible to remove, reclaim and recycle the synthetic turf system at the end of its useful life at no additional cost to the owner. The Synthetic Turf System Vendor shall provide a signed affidavit at the time of bid that, at the end of the synthetic turf system's useful life, 100% of the turf product will be removed, reclaimed and recycled as outlined below.
- B. The Synthetic Turf System Vendor must provide documentation outlining their product lifetime recycle / reuse program. All material must be able to be cradle-to-cradle certified and demonstrate 100% closed loop recyclability, **recycling for energy not acceptable.**
- C. Prior to final acceptance of the synthetic turf field, the Synthetic Turf System Vendor shall set up an Escrow-Secured Guarantee by placing \$50,000 into an Escrow Account at an FDIC insured institution, the account to be held jointly by the Owner and the Synthetic Turf Manufacturer-Installer. All funds in the account shall be released by the Owner to the Manufacturer-Installer (at the recommendation of the Architect) upon the successful recycling of the turf at the end of its useful life, per the provisions outlined herein. Should the Manufacturer be unable for any reason to recycle the turf field as per the provisions of the specifications, the Owner shall be entitled to the funds, including interest, for the purpose or recycling the turf properly by other means and other parties.
- D. All removal and recycling operations shall be performed by personnel fully familiar with the materials and their application, under the full-time direction and supervision of a qualified technical supervisor employed by the Vendor of the Infilled Synthetic Turf System. Installation supervisors shall have a minimum of 3 years of experience.
- E. The removal, reclamation and recycling process shall include the following:
  1. No less than 95% of infill is extracted from synthetic turf.
  2. Synthetic turf is cut, rolled tightly and secured.
  3. Synthetic turf rolls are steel banded and stacked into containers.
  4. Synthetic Turf Vendor will maintain chain-of-custody, including the following information:
    - a. Project Name and site location.
    - b. Serial number of all containers.



- c. Synthetic Turf System Vendor will be responsible for the cost to transport all containers to and from the project site, as well as freight to the selected synthetic turf recycling facility.
- d. Synthetic Turf System Vendor shall provide to the Owner documentation pertaining to the date all containers arrive and depart from site; Date of arrival at turf recycling facility, and; Date of final processing into post-consumer products.
- e. Issuance of Certificate of Compliance Once synthetic turf has been received and processed, a Certificate of Compliance will be issued with reference to job name, site location, date turf products left the site, serial number of container, date received at plant and date processed into post-consumer products. Synthetic Turf System Vendor will be responsible for confirming 100% of the synthetic turf was recycled into post-consumer products.

I hope that you find this information helpful in your review. Thank you for your time and consideration. Please let me know if you have any questions or require any additional information.

Sincerely;  
Huntress Associates, Inc.

Christian C. Huntress  
President

Cc: Matthew D'Andrea – MVRPS Superintendent  
Richard Smith – MVRPS Asst. Superintendent  
Kimberly Kirk – Chair, MVRHS School Committee  
Joseph Sullivan – Daedalus Projects, Inc.  
Oak Bluffs Planning Board

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