

**HB1147: Environment - Playground Surfacing Materials - Prohibitions  
House Environment and Transportation Committee**

**February 28, 2024  
Position: FAVORABLE**

**Submitted by Megan Stallard, Grade 9, Poolesville High School**

Good afternoon, Chair Korman, Vice Chair Boyce, and committee members.

My name is Megan Stallard. I am a ninth-grade student at Poolesville High School in Montgomery County, Maryland. In addition, I am a member of the inaugural MCPS Student Climate Action Council (SCAC), sanctioned by the Board of Education to advise on sustainability issues and to support student sustainability projects with a several thousand dollar budget. This testimony is not written on behalf of the entirety of the SCAC. However, as a student leader and climate advocate, I urge a favorable committee report on bill HB1147, which bans tire crumbs as a playground surface. This bill is a critical step in protecting students like myself in this state from catastrophic, data-backed health effects. Tire crumbs in playgrounds [contain](#)<sup>1</sup> nine different carcinogenic chemicals. In fact, tire crumb playgrounds cause a [risk of cancer](#)<sup>2</sup> that is ten times higher than uncovered soil playgrounds.

Cancer is not the only risk of tire crumb playgrounds. A [test](#)<sup>3</sup> completed on one such playground found that a single playground contained over 7,000 parts per million (ppm) of lead,

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<sup>1</sup> Benoit, G., & Demars, S. (2018, February 12). *Evaluation of organic and inorganic compounds extractable by multiple methods from commercially available crumb rubber mulch - water, air, & soil pollution*. SpringerLink. <https://link.springer.com/article/10.1007/s11270-018-3711-7>

<sup>2</sup> Tarafdar, A., Oh, M.-J., Nguyen-Phuong, Q., & Kwon, J.-H. (2019, May 27). *Profiling and potential cancer risk assessment on children exposed to pabs in playground dust/soil: A comparative study on poured rubber surfaced and classical soil playgrounds in Seoul - environmental geochemistry and health*. SpringerLink. <https://link.springer.com/article/10.1007/s10653-019-00334-2>

<sup>3</sup> Baca/ABC7, N. (n.d.). *7 on your side: Labs say toxic lead is present at this D.C. Elementary School Playground*. WJLA. <https://wjla.com/features/i-team/toxic-lead-present-at-dc-school-playground#>

70 times higher than the 100 ppm limit on lead content in children's toys and products. The World Health Organization (WHO) has [stated](#)<sup>4</sup> that there is no safe lead level. Further, tire crumb playgrounds contain PAH chemicals, which exacerbate a young individual's risk of cancer, as well as asthma and cardiovascular diseases ([WHO](#))<sup>5</sup>.

All current research supports the simple truth: we must ban tire crumb rubber in playgrounds. It is a hazard to the young people of Maryland, who are the future of this state, and in this way, it is a hazard to all of us. I strongly urge a favorable report on HB1147.

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4

<sup>5</sup> World Health Organization. (n.d.). *Lead poisoning*. World Health Organization. [https://www.who.int/news-room/fact-sheets/detail/lead-poisoning-and-health#:~:text=There%20is%20no%20known%20safe,and%20learning%20problems%20\(1\).](https://www.who.int/news-room/fact-sheets/detail/lead-poisoning-and-health#:~:text=There%20is%20no%20known%20safe,and%20learning%20problems%20(1).)