



Current regulations demand that you save, store and recycle all used oil from your equipment.

Really, Mr. Inspector, no one told me...

BY SCOTT BELL
Bent Pine GC

Hopefully that won't be you if you are ever visited by the various agencies that govern our industry. To help all of us avoid embarrassing non-compliance, I have compiled a list of items that will help to insure that you are complying with the laws.

This is a step-by-step guide to compliance. Most of these items have been researched by our Government Relations chairman, Tim Hiers and they have also been reviewed by Jeff Wharton of United Horticultural Supply who spoke at the South Florida USGA meeting this spring.

The Board of the FGCSA cannot stress the importance of this minimum compliance.

The old saying is so true that a chain is only as strong as its weakest link and in our business this holds fast.

For example, in Vero Beach most of the courses have now built new maintenance complexes or the courses are so new that the complexes are up to date. While we have all spent or we are spending money to have new, safe, and environmentally friendly complexes that comply with the laws, if one of us slips up, all of the good work of the others will mean less and a negative news article in the local paper will hurt all of us.

Fourteen of the following 15 items are required by law. If you have not developed a policy for these it is in your best interest and the industry's best interest that you do.

Most of this compliance effort costs little more than your time and it should be

your goal that all Florida courses participate. If you have any questions regarding compliance to any of these, call me or Tim or Jeff and hopefully we can point you in the right direction.

1. SARA Title III Compliance

SARA Title III has been around since the late 1980s and hopefully all of the attention that the association gave it then got all of us in compliance.

Generally, if you are storing Nemacur 3, you may need to review the SARA laws. If you are storing large amounts of diesel fuel or gasoline (over 1700 gallons) then you need to check the laws.

Generally, if you are storing more than 5 tons of any pesticide or petroleum product, then you need to check the laws. If you

store Paraquat then you really need to check it.

In my opinion, no course should have five tons of any single pesticide on site for safety purposes as well as environmental. If you are storing chlorine gas for a swimming pool then you also need to consider SARA III.

2. OSHA Hazcom – Florida Right to Know

This law has been around since the mid-1980s and is one that you better be complying with.

To comply with this law you must first develop a written program that includes an alphabetical list of all hazardous products in the workplace and their MSDS's. If you don't know what an MSDS is then please call Tim Hiers or myself immediately.

Getting back to the written program, you must also include a description of how to obtain the MSDS in an emergency. The written policy must explain the labeling requirements for hazardous chemicals.

The written policy must also explain many other safety items such as employee training on Hazcom, emergency procedures for exposure or spills, ways to inform visitors or outside service personnel, and the identification of an individual who is the main Hazcom trainer.

Employers are required to explain the written policy to the employees. You should conduct regular training programs regarding the health hazards of the hazardous chemicals. Maintain detailed records of employees' attendance in these training sessions.



Displaying MSDS sheets and right-to-know information is the law – but it is not difficult to comply with.

Finally, all hazardous chemicals should be labeled. The best way to comply is to leave the compounds in the original labeled container.

The Hazcom/Right to Know is fairly easy to comply with if you take some time. GCSAA has seminars on it at the convention, FTGA has information on it, the state of Florida will be happy to send you information.

I have a written Hazcom policy that has

blanks for you to fill in so that it pertains to your place of business. This is a very easy and fast way to begin to comply with the law. Contact me and I will mail you a copy.

3. Chemical storage

Pesticide storage can be a huge liability for you and your club. Inspectors are out there spot checking and answering complaints usually from curious neighbors or disgruntled ex-employees.

Pesticide storage should be separate from your maintenance building in a locked concrete or metal building. If you have a fire in your shop and if there are pesticides stored in the shop, the fire department will probably let the building burn so that there is no pesticide run-off.

A good pesticide storage building will have a fairly impervious floor like metal, concrete or plastic and walls of similar material. The building needs to be properly ventilated and labeled. The shelves should be steel and ventilated, certainly not wooden. The doors should be large and accessible.

Tim Hiers has gotten Steve Dwinell of the Florida Department of Agriculture

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and Consumer Services to work with FGCSA on chemical storage buildings and mixing sites.

4. Fuel and oil storage

All fuel storage tanks greater than 110 gallons must be registered with the state.

Above-ground tanks must be contained and underground tanks must be properly monitored. Liability coverage is mandatory for underground tanks and beginning in 1995 it will also be required for above-ground tanks as well.

Underground fuel storage require record-keeping of both monitoring wells and fuel inventories. Above-ground record keeping is much less stringent.

Above-ground tanks under 550 gallons do not need secondary containment.

5. Hazardous waste storage and disposal

Some of the byproducts of the equipment maintenance division of your operation are hazardous wastes and they must be disposed of properly.

The landfills do not want your petroleum wastes, so provisions must be made to dispose of them. Obviously your used oil must be saved and hauled off by a state-licensed waste oil hauler.

In years past, the haulers paid a small amount for the oil to the producer. However, recently the producer (golf course)

has gotten used to paying the hauler to take it away.

Used oil and hydraulic fluids are not the only wastes that need to be specially treated. Oil filters are to be stored in a container and they are hauled off to be recycled. In our operation, we use Safety Kleen Corp. to handle our parts washing, waste oil and used oil filters. They are one of the state's licensed haulers and you get the paperwork to release you of the liability of the waste.

Used batteries and tires cannot be disposed of in landfills and your battery and tire suppliers should take your used products when you buy new.

Finally all fluids such as anti-freeze, brake fluids and power steering fluids



Emergency eyewash and shower station at the chemical room is not only common sense but a well founded regulation.

must be properly disposed of.

6. Rinsate procedure

All empty pesticide containers should be triple rinsed or cleaned with a puncture nozzle to over 99% clean. The container must then be punctured so that it can no longer hold liquid and the container should be flattened.

7. Mix load procedure and site

It has been proven that the greatest risk for pesticide exposure is at the mixing stage.

The applicator is handling the concentrated chemical and is probably holding the container close to his or her body. This means greater risk of exposure to eyes, skin, mouth or inhalation. The applicators must be taught proper procedures while mixing.

It's up to the supervisory staff to insist that the proper equipment is used to insure worker protection. This would include long-sleeved shirt and pants or coverall, a chemical-resistant apron while mixing, chemical resistant gloves and boots, and approved eye protection.

Most of these items should also be used during spraying but to be sure, check the labels regarding worker protection. The worker-protection laws can actually help us as superintendents to protect us and our clubs so long as we abide by the laws and document that the workers have been trained.

The state has finally established and published guidelines for mix/load sites. These mix/load sites help to contain all spillage during mixing so that no excess chemicals are discharged on to your property. Here again, it has been proven that the greatest pesticide concentrations and any significant pesticide pollution has generally been in the mix/load areas.

Your local seed, fertilizer and pesticide

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inspector has the mix/load guidelines as well as a worker protection guidelines and they are free for the asking.

8. Restricted-use pesticide license

Every golf course superintendent should have a Restricted Use Pesticide License. Every assistant superintendent should have a RUP License and every spray tech should have a RUP License or he or she should be working toward it.

You should also know and you should be keeping records of all restricted-use pesticides that are applied to your course. This is the computer age and the state knows or it can find out when you have purchased RUPs. Respirators must be matched in accordance with chemicals applied.

9. Written respirator policy

The respirators that you buy for yourself or your employees should be professionally fit. Some of the suppliers of the respirators offer this as a service when you purchase the mask.

Remember that facial hair disrupts the seal of the respirator giving you an improper fit. Employees who use respirators are also supposed to be tested by a doctor to insure that the employee can breathe properly with the mask in place.

10. Aural protection program

You should be taking steps to help to protect your employees' hearing from the roar of motors that they are subjected to each day. We supply the employees with disposable ear plugs and we require that the plugs are used when any power equipment is used.

We also have the employees' hearing checked and recorded once a year. This is the law and it helps to protect the employee if any gradual hearing loss is detected. It is against the law to have people operating loud equipment without the proper hearing protection.

11. Lockout/tagout standards

These provisions can apply when a person is working on something that is mechanical, electrical, pneumatic or hydraulic and that person cannot be seen at the control point, switch or breaker.

For example, if an electrician is working on something in your shop, he is required to tag the breaker with a warning that the breaker must stay off while he is working on that line.

The same should be done by the irrigation tech if he/she has the power off to the field or the pumps or water off to repair a pipe. Mechanics should use lockout/tagout to keep others from turning on equipment while they are working on it.

12. CPR training

Your staff should be trained in CPR. Check with your first aid supply person to see if their company offers CPR training. If not call the Red Cross or the Heart Association or the Emergency Management department in your county government.

13. Slips and falls

All precautions should be taken to protect workers from slips and falls. Ladders

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should be inspected to make sure that they are in good working order and they should be replaced if they are not.

All work areas should be kept clean and any spilled oil or fluids should be dried up immediately. All tree climbing safety gear and ropes should be inspected.

14. Safety & Health Programs

The Bureau of Industrial Safety and Health offer free inspections of your workplace. If problems are found you are told how to correct them and you are expected to correct them. If you pass all inspections or you make all of the necessary corrections, you could become exempt from OSHA general inspections for one year.

15. IPM

IPM has become one of the major buzzwords of this decade for our industry. Some of the IPM is just smart, common-sense management. Grow healthier grass, use less chemicals. Mow with sharper reels at proper heights and have healthier

turf.

Obviously all IPM is not that easy but it is really not that hard. Use soil tests to determine fertilizer needs. Use more slow release fertilizers since the plant can only absorb so much at any given time. See if you can use less fertilizer in the summer if play is light and members are away.

Scout for dangerous pests instead of just routine spraying products for mole crickets, nematodes and sod webworms. A common industry goal is the judicious use of pesticides and fertilizers.

Education of the golfers and members is a must because they should know you are trying to improve the way that you manage your course so that if an IPM method fails they will know why.

Start small with IPM. Start on small areas to make sure that things will work as you would with any new pesticide or procedure.

There are other safety items that are not necessarily outlined by any laws but they could save you and your staff trouble in the

future.

Back injuries can be debilitating and they can injure someone for life. Try to instruct your staff, especially the younger guys, that it is all right to ask for help when lifting.

Govern your transport vehicles to avoid injuries. Teach the staff about fire safety and the volatility of gasoline. Teach them how to use fire extinguishers.

Part of your Hazcom will be spill confinement. Finally, Burt McKee tells me that it is not a good idea for staff members to transport pesticides in vehicles on public roads without first taking the DOT training course.

It is up to all of us to ensure our industry works toward compliance of the laws and regulations. After we all comply then we can tell another positive story about the golf course industry. The FGCSA will help you in any way to get into compliance with the above subjects. Please feel free to contact myself or Tim Hiers or the FGCSA office for help or information.

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