

# FIELD OBSERVATIONS



*By Ralph K. Dain Jr.,  
GCSAA Regional Representative Florida*

About 30 minutes and 50 failed starting sentences have passed since I first sat down in front of the screen to write this update. Thank goodness I am not still typing this on my Smith-Corona SD300 from my college days. Don't even ask what model Joel used back in his day! I would have gone through a whole ream of paper and a couple of bottles of white-out.

Anyway, it's great to be back with my third installment of Field Observations. I am happy to report from my travels that more than a few members have relayed to me that golf rounds at their facilities have started out strong this season. I am also thrilled to report that water levels in course lakes in Southwest Florida have returned to the confines of

their typical shorelines.

Switching to government relations, I want to highlight a few key components from the NPDES (National Pollution Discharge Elimination System) pesticide general permit that has been officially adopted by the Florida DEP. I have had a number of correspondences with superintendents around the state and realize there remains some ambiguity on how NPDES impacts operations at your facility.

Overall, the Florida DEP has attempted to keep the permitting burden to a minimum for pesticide applicators. The good news is golf course superintendents will NOT be required to file a Notice of Intent (NOI) to make aquatic applications, pay the permit fee (\$500 for 5 years), or complete a pesticide management discharge plan. Superintendents will be covered automatically under this plan and do not have to apply for the permit. Also, you will likely not receive any correspondence from the DEP regarding the NPDES General Permit.

During my chapter visits around the state, I have frequently mentioned our concern over the term "applied near water" in the permitting language and this impacted applications to turf adjacent to bodies of water. Fortunately the permit in Florida does not impact any terrestrial pesticide applications.

However, there are clearly outlined procedures in the Florida permit that need to be adhered to in the event that

there is an adverse incident that impacts a body of water. I strongly advise you to familiarize yourself with these requirements. I have included a link to the NPDES Permit in Florida: [http://www.dep.state.fl.us/water/wastewater/iw/docs/62-621.300\\_8e.pdf](http://www.dep.state.fl.us/water/wastewater/iw/docs/62-621.300_8e.pdf).

Again, overall the Florida DEP has done a nice job of keeping the impact of the NPDES permitting to a minimum. This has not been the case in other states as superintendents are required to submit an NOI to apply pesticides, produce a pesticide management discharge plan and pay the permitting fee. GCSAA continues to push for passage of HR 872 bill in the Senate which provides a legislative fix for NPDES permitting. We encourage you to utilize our Take Action resource on our website to reach out to your elected officials on this matter.

Unfortunately, in Florida the NPDES permitting does make it easier for individuals to file lawsuits claiming pesticide applications have been improperly discharged. There will most likely be challenges by environmental activist groups and the NPDES permitting process could lead down uncertain paths in the future.

For more information you may call me at 785-424-4306 or email to [rdain@gcsaa.org](mailto:rdain@gcsaa.org).

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