

Golf Courses Show Strong Compliance With Pesticide Regulations

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About 97 percent of U.S. golf courses tended by GCSAA members have at least one currently certified pesticide applicator on staff, according to the findings of a survey of Class A members.

GCSAA's Office of Government Relations and Education Department recently conducted the survey to gauge the degree of compliance with federal and state pesticide applicator regulations among professional golf course superintendents.

"These results provide strong evidence of our members' commitment to safety and sound ecological practices," says Tom Akins, GCSAA Government Relations manager.

"GCSAA strongly supports the position that only properly trained and educated personnel should be allowed to purchase and apply restricted-use chemicals," Akins says. "We are pleased that the survey data show that an overwhelming majority of our membership follow that policy on the courses they manage, and comply with state and federal regulations."

Of the 1,157 superintendents who responded to the GCSAA survey, 1,061, or about 92 percent, hold valid pesticide applicator licenses for the state where they work. Another five percent who are not licensed themselves have someone else on staff who is licensed.

Most of the 36 respondents who had no certified pesticide applicator on staff said either they used no restricted-use pesticides whatsoever, or they had recently moved from another state and were in the process of becoming certified.

Under Section 3 of the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), any pesticide classified by the Environmental Protection Agency (EPA) for restricted use only "shall be applied for any use to which the restricted classification applies only by or under the direct supervision of a certified applicator."

FIFRA Sec. 2 (e)(4) defines "under the direct supervision of a certified applicator" as follows: "Unless otherwise prescribed by its labeling, a pesticide shall be considered to be applied under the direct supervision of a certified applicator if it is applied by a competent person acting under the instructions and control of a certified applicator who is available if and when needed, even though such certified applicator is not physically present at the time and place the pesticide is applied."

At present, EPA is considering some revisions in the pesticide applicator certification regulations promulgated under FIFRA, including the addition of another level of direct supervision which would require the certified applicator to be on site and available at point of use within five minutes. GCSAA will comment on the proposed rules after they are published in the *Federal Register*.

EPA also has proposed a reclassification of pesticides determined to pose a hazard to groundwater. (*See Briefing*, December 1989.) Akins estimates that as many as 30 more pesticides may be labeled "restricted-use" under this proposed rule.

Section 4 of FIFRA allows each state to implement its own pesticide applicator certification program, and to date, every state except Nebraska has its own program. (The Nebraska legislature has labeled a proposal to enact a state certification program, and currently the U.S. EPA administers the program that certifies Nebraska pesticide applicators.)

A number of states already have stricter requirements than

the current FIFRA guidelines, and superintendents should contact their local regulators to keep current on local requirements. Some states require:

- A certified applicator to be "on-site" or "side-by-side" a non-certified applicator.
- An operator's license for the person who actually does the spraying under the certified applicator's supervision.
- Certification and a license for anyone on the golf course who applies any general-use or restricted-use pesticides.
- An annual report of pesticide usage.
- Golf courses that use restricted-use pesticides to obtain special liability insurance.

Still, most states do not require the person who actually does the spraying to be licensed — as long as the sprayer is under the "direct supervision" of a certified applicator — but about 56 percent of the GCSAA survey respondents reported that they are certified themselves and also have at least one other employee who is currently licensed to apply restricted pesticides.

The survey data revealed no significant difference in pesticide licensing between certified golf course superintendents (GCSA) and noncertified superintendents. Of 455 CGCS superintendents who responded, 93 percent are currently licensed pesticide applicators. Of 700 non-CGCS superintendents who returned the questionnaire, 91 percent hold current pesticide applicator licenses.

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