38 straight years. Maintaining that standard keeps Tommy Anderson, pictured, director of Grounds and Landscaping, busy. With 36 people at the summer peak, the over 40 acres of maintained area requires a lot of hand work. The responsibilities cover water gardens, hardscapes, turf areas, flower beds, over 200 hanging baskets with drip irrigation, changing flowers three times a year, planting 12,000 bulbs, landscaping, lake maintenance and even moving large trees. Upgrading the landscape is on-going.

Blue Cross/Blue Shield Hartford, Ct.
Gary Dickinson, grounds superintendent for this 1997 PGMS award winner has served the site for 26 years. "After a while, you know what to expect from certain plants at certain times of the year," says Dickinson, who also manages the interiorscapes at the site. He has three full time employees and four summer hires to help him maintain the grounds. Special feature for this year includes a sculptured English gothic style garden, borrowed from a design at a Disney theme park. "Anybody and everybody in this trade sees things at other locations and tweaks them to fit their areas," he says.

Lake Forest Academy, Lake Forest, Ill.
C. Brent Mayberry, vice president/general manager, says Signature Landscaping, Lake Forest, has had the Lake Forest account for five years. "We convinced them that outsourcing would be the way to go; it takes the pressures off of their shoulders so their crew can concentrate on other in-house duties." Signature devotes seven people to the site for basic maintenance, with two more for tree and lawn care duties. Around for 16 years, for the last seven years Brent has been vice president and general manager. Signature is a division of Sydney Services Corporation, Lake Bluff, IL.

Westfield Companies Westfield, Ohio
Ken Kushmider, shown far right, is the superintendent in charge of grounds and the licensed landscape architect at this beautifully maintained insurance company complex. Kushmider and assistant superintendent Russell Luyster, left, and a crew of eight manage the home office grounds and coun-

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try club complex that is contains 40 acres of turfgrass, 40 acres of asphalt (a snow removal challenge), six acres of shrubbery and one acre of annuals and perennial bed.

Kushmider credits assistant superintendent Luster for being "a very important part of what we do here. I take care of designing and/or setting up the work plan. I give Russ the tools and he makes sure it gets done. It's a wonderful combination." Recent projects included a new clubhouse and landscaping at the company country club.

**Illinois State University Normal, IL**

Mike O'Grady, assistant grounds superintendent, has been at ISU 21 years. His crew of 18 maintains 350 acres of grounds, 125 of which is highly detailed work; including five athletic fields, president's residence, the university quadrangle around residence halls and institutional buildings around campus.

100 different varieties of trees grow at ISU, and the university is also an arboretum. All trees are categorized using a new bar code id system.

**Mohonk Mountain Resort New Paltz, NY**

John Van Etten has been the grounds manager for 13 years at this 129 year-old resort with a 101 year-old golf course. It's a national historic landmark. A greenhouse supplies all the nursery stock for the gardens: geraniums, mums, poinsettias. They store a couple thousand bulbs in winter. Tom Wright is the greenskeeper for the 9-hole golf course. The crew of 23 maintains 500 acres of grounds. A 110 year-old, 3-acre organic show garden is the focal point and changes with the seasons. The golf course, designed in the Scottish style, is Audubon certified.

**The Channahon Park District Channahon, IL**

The rapidly growing village of Channahon, in the southwest Chicago metropolitan area, maintains award-winning parks. These parks (381 total acres, 239 developed) include one of the highest-rated public golf courses in the country, Heritage Bluffs, and the 44-acre Central Park with its Tornahawk Aquatic Center. Channahon, Park District Executive Director Charles J. Stoke and his staff are following a detailed master plan that was developed with strong community input.

**The Breakers Hotel Palm Beach, Fla.**

For 17 years Chip Guile has been the grounds supervisor at this legendary hotel. "We're continually trying to improve and add on to our theme gardens," says Guile. Special gardens (with more than 20,000 annual flowers) cover one-and-a-half acres, and include a children's garden, a color garden, a tropical garden and an herb garden. The total property covers more than 140 acres, including a 90-acre golf course. There are approximately 90 acres of shrubs and hedgework at The Breakers. Formal hedges alone cover five twisting, turning miles.

**Gettysburg National Military Park Gettysburg, Pa.**

Visit Gettysburg and you "step back in time" more intensely than at any other national historic site. Rustic monuments are everywhere, and the Civil War comes alive as you walk these historic grounds. Landscape Preservation Supervisor Danny L. Reever has served his country here for 30 years. Bruce Craig is the new chief of resource management, who recently ran the National Park Trust. The summer-time crew of 18 works around drives of visitors, whose numbers total 1.5 million annually. A six-man crew mows and trims 6000 acres weekly, and crews remove snow from 33 miles of paved roads.

**Richard G. Hocevar Bldg. Laurel, Md.**

Home of the Washington Suburban Sanitary Commission, this site contains six acres of turf, two acres of display beds and three acres of woody ornaments. The crew also tends 18,000 sq. ft. of shrubbery. Drainage and insect control are a challenge in terraced areas; heat from the building's mirrored exterior combines with a strong soil base. The grounds are managed by Ruppert Landscaping. James Sweep is the manager.

**Rockville City Hall Rockville, MD**

The Rockville City Hall campus is a 4.1 acre site in Montgomery County, north of Washington, DC. Flowering trees add lots of color to the site, which also contains a white oak tree that is a descendent of the Wye Oak, the Maryland state tree. There are 55 rose bushes on the site, a gift from sister city, Pinnenberg, Germany. Bulbs, annuals and perennials appear in rotation throughout the year. Ron Orndorff is horticulturist since 1989. Crew size is 3 full-time and two temporary grounds keepers. The newest park is in Courthouse Square with fountains, hedges, concert area. The crew visits city hall one day each week as well. The biggest challenge there is the rose garden. They require weekly maintenance to keep them in their prime. "We want all our sites to appear as if they never need maintenance," says Orndorff.

**Andrews University Berrien Spring, MI**

Dave Nelson began here in 1976. He manages the arboretum and grounds around this 1600-acre campus. Two full-time staffers help out, and students, from an on-site grade school volunteer throughout the year. The youngest do weeding and watering. The campus is known for expansive lawns and attractive groves. The landscape has many annual and perennial beds and a large rock garden. Shrubs of many years duration outline the buildings around the campus, an international flag mall displays dwarf flowering trees and shrubs, and changing display beds of annuals and bulbs in spring, summer and fall seasons.

**Case Western Reserve University Cleveland, Ohio**

John Michalko, pictured, gets added responsibilities at Case Western Reserve University, being recently named assistant director of campus operations. He started at the university in 1977 as superintendent of grounds, and continued in that capacity for over 20 years. "We've had a lot of changes. We developed a master plan, and our president has been very active in improving this campus," says Michalko.

**Franklin Plaza Austin, TX**

This 500,000 sq. ft. office complex in downtown Austin covers one square block with multi-level turf and ornamental beds. A courtyard on a lower level has a water feature surrounded by trees and turf. Large, 50-year-old oaks provide a little too much shade for the St. Augustine grass turf, and there is urban stress from heat, automotive exhaust and foot traffic. Crepe myrtles and Asian Jasmine surround the 30-inch diameter oaks. Ryegrass is green and lovely as the myrtles bloom in spring. Annual change outs are performed each year, with a vast array of colors. The landscape is managed by Rusty Brightman and his crew from Clean Cut, Inc.

**Arboretum Retail Austin, TX**

This shopping center is located in a hilly, rocky area, and many native trees were left alone during construction. No topsoil was incorporated during construction, so constant monitoring is required by the crew from Clean Cut, Inc. Shoppers do lots of walking through
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**Mean Turfgrass Quality Ratings**

<table>
<thead>
<tr>
<th>Cultivar</th>
<th>Rating</th>
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<tr>
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<tr>
<td>Millennium (TMI-RBR)</td>
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<tr>
<td>Rembrandt (LTP-4026 E+)</td>
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<tr>
<td>Arid 3 (J-98)</td>
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<td>Rebel Sentry (AA-A91)</td>
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<tr>
<td>Kentucky-31 W/Endo</td>
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this site, so parking lot islands are maintained to perfection. Turf areas are topdressed each year to keep the surface level for mowing crews. Various plants are pruned with different techniques. Indian Hawthornes, dwarf Yaupon Holly and Maiden Grass are used for a great display of color and foliage.

University of San Francisco
San Francisco, CA

The university is bordered all around by sidewalks. The site covers 55 acres, and two off-site campuses are in a residential neighborhood. The Lone Mountain campus and main St. Ignatius Church campus are very hilly, and the climate poses other challenges. There are many tropical plantings, with dense annual and perennial beds. Jay Stafford is the grounds superintendent.

Arizona State University
Tempe, AZ

This campus comprises more than 700 acres and is populated by more than 42,000 students. The campus contains 85 acres of turf, 40 of which are used for student athletics. Sun Devil Stadium is home to the Arizona Cardinals, and host stadium for the Fiesta Bowl. The campus has been designated an arboretum since 1990. A Horticultural Resource Center on Campus studies cancer research bulbs, drought-tolerant trees and annual flower test trials. David Webb and Donald Dickerman manage the grounds.

LANDSCAPE COMPANIES

Valley Crest
Calabassas, CA

Environmental Industries, Inc., turns 50 in 1999. Burton S. Sperber and his father started it as a family nursery. Now the nation's largest landscape provider and maintainer. Richard Sperber is president of its Valley Crest Division which offers landscape/irrigation/site development and reported revenues of $230 million in 1997. Valley Crest has 10 offices and about 1700 employees. Another operating division of Ei is Environmental Care, Inc., which provided landscape maintenance services of about $93 million in '97. Bruce K. Wilson has been president since 1980.

LandCARE USA, Inc.
Houston, TX

LandCARE USA, Inc., will generate about $220 million in revenues in 1998, its first year in business. The company was formed early in 1998 when seven green industry firms joined to form what's approaching the first truly national landscape company. Since LandCARE USA went public on June 4, it has acquired another five landscape firms with more additions planned. William Murdy, pictured, is chairman and CEO for the company. (See related article on page 15.)

The Brickman Group, Ltd.
Langhorne, PA

The Brickman Group has traditionally relied on internal growth which has been running at about 20 percent a year. In 1997 The Brickman Group provided about $105 million in landscape services, said Scott Brickman, pictured. That number should increase significantly in 1998 as the company announced three acquisitions this past spring and another this summer. The Brickman Group has 60 branch offices with its presence strongest in the East and Midwest. The company's headquarters are in Langhorne, PA, adjacent to Philadelphia. (See related article on page 15)

TruGreen-ChemLawn
Memphis, TN

The lawn application giant entered the maintenance market by starting a Landscape Division and acquiring four sizeable landscape companies early in 1998. TG-CL has made several other purchases since in key markets. The announced acquisition of Ruppert Landscape Co., Ashton, MD, in late August will push the newly formed division's revenues to about $140 million in 1998. (See article on page 12.)

The Bruce Co. of Wisconsin, Inc.
Middleton, WI

The Bruce Co. of Wisconsin reported revenues of about $27 million in 1997, and growth of 21 percent. It employs 490 people, says Vice President Arnold O. Sieg, pictured.

American Landscape Companies
Canoga Park, CA

Mickey Strauss, the president of this firm, reported revenues of $20 million for 1997, an 11 percent increase from '96. American Landscape Companies has six branch offices.

The Groundskeeper
Tucson, AZ

This powerhouse in the American Southwest is built upon the knowledge and commitment of its front-line employees. From seven branch offices, The Groundskeeper completed about $18 million in work in 1997, and anticipates about 10 percent growth this year, reports Kent Miller, pictured.

Landtrends, Inc.
San Diego, CA

This diversified landscape company has shown impressive growth since its founding in 1981 by Jon Ewing, pictured. Active in the California and Nevada markets, Landtrends billed out $15 million in 1997. It has two branch offices and about 410 employees. This year it added sports turf management as a service.

Vila and Son Landscape & Nursery
Miami, FL

This South Florida business reported modest growth of 2.5 percent in 1997, and sales just under $15 million. Vila and Son Landscape & Nursery employs 195 and has two branch offices.

Chapel Valley Landscape Company
Woodbine, MD

Now celebrating its 30th year, this Washington D.C.-area landscape company now offers colorful installations in downtown metropolitan areas. The company saw 28 percent growth in 1997 to about $14 million, but doesn't expect to grow as fast in '98. Chapel Valley employs 250 and has two branch offices. The company is operated by founder J. Landon Reeves.

Landscapes Resources, Inc.
Farmers Branch, TX

President Steve Barley reported respectable growth in 1997 and sales of about $14 million. The company has four branch offices and 350 employees.

Schumacher Landscaping
Boston, MA

Schumacher is building its athletic field construction business as it grows its other offerings. In 1997 this Boston-based company totaled revenues of $133 million, a 34 percent increase from the year before. About 80 percent of the company's revenues come from installations,
L&L Landscape Services, Inc.
Campbell, CA
President Steven C. Glover reports a strong 1997 for the California-based company. He pegged growth at 20 percent bringing revenues to $8.7 million this past season. He and Rob Zolessi own this 22-year-old company that has forged a strong relationship with its clients. L&L has three branch offices and a staff of 163.

Stiles Landscape Service Co.
Pampano Beach, FL
Landscaping services are year-round this far south, and this company's 120 employees working out of one location keep pretty busy. Stiles Landscape grew by 16 percent in 1997 and reported revenues of $8.3 million.

The Greenery, Inc.
Hilton Head, SC
B. W. Edwards, president, notes that his company grew about 15 percent in 1997 to $7.9 million. The Greenery has two branch offices and a staff of 168.

Hillermann Nurseries
Lexington, KY
The company, with the most longevity on our list, Hillermann Nurseries is over 150 years old. The company reported a slight dip in revenues for '97 to $7.7 million, but expects just over 10 percent growth this season. About 175 employees operate out of a single location for this quality, full-service company.

Lawn Care Operators
TruGreen-ChemLawn
Memphis, TN
TruGreen became the lawn care industry powerhouse early in the decade when it purchased ChemLawn. Several years ago TG-CL absorbed Barefoot Grass, then the nation's second largest lawn care provider. TG-CL has continued to acquire local and regional lawn application companies. TG-CL is a part of ServiceMaster Consumer Services, and generates 80 percent of its revenues in the residential market.

Dave Slott, pictured, is president of TG-CL. The company reported $770 million in sales for 1997, a 22 percent increase over 1996.

Davey Tree Expert Company
Kent, Ohio
Although this Ohio-based company is best known for its tree work, it's a nationwide provider of lawn care services too. Founded more than 110 years ago and now employee-owned, the Davey Tree Expert Company reported sales of $295 million in 1997, up 10.5 percent from '96. The company does not break its sales into one category or another but reports total revenues for its four divisions: Residential, Commercial, Utility, and Consulting.

Jensen Corporation
Cupertino, CA
The California-based company with two branch operations and 100 employees reported a 20 percent sales increase in 1997 to $9 million in revenues.

Leisure Lawn Inc.
West Carrollton, Ohio
With 10 locations, this Ohio-based company is one of the largest regional lawn care providers in the country. President Douglas Baker
NaturaLawn of America
Frederick, MD
NaturaLawn of America marked its 10th birthday in 1997 with significant growth, about 28 percent reports R.C. Loeb, vice president. With 42 locations, the Maryland-based operation generated about $11 million in sales last year. NaturaLawn of America markets itself as an alternative to traditional, chemical lawn care and has grown every year since its founding.

Massey Services
Maitland, FL
In Florida it’s not unusual for a company to offer both structural pest control services and lawn applications. Massey Services, headquartered just east of Orlando, is a leader in both. In 1997 Massey Services reported sales of about $21.5 million from 35 locations. About $7 million of that was in lawn care, reports a company spokesman.

Pro-Grass Inc.
Willsonville, OR
This 20-year-old company has evolved into a full-service lawn care company also offering tree care services. Headquartered in Oregon, it does business in locations throughout the Pacific Northwest, including northern California. Pro-Grass grew by 14 percent in 1997 to $7.7 million. It has five branch offices and about 150 employees.

Senske Lawn & Tree Care
Kennewick, WA
This company, headquartered near Spokane, WA, has been around for more than 50 years and it keeps growing and growing and growing. President Chris Senske reports it grew by 9 percent in 1997 to about $8.3 million. A bit more than half of that is in lawn and tree care. The company now does Christmas lighting.

The Lawn Co., Inc.
South. Dennis, MA
One of the largest independent lawn care operations in New England. The primary market for this company is eastern Massachusetts and Cape Cod. Ed McGuire started the company in 1979 and has since grown it to about $5 million in sales with three branch offices and 65 employees.

Scotts Lawn Service,
Marysville, OH
One of the most recognizable names in lawn care made a move into the professional lawn application market prior to the 1997 season and racked up revenues of $4.5 million by year’s end. Scotts Lawn Service reports 10 company-owned locations and 21 franchise outlets.

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Smithfield, NC
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Pittsburgh, PA
Malvern, PA
Phoenix, AZ
Denver, CO
Florence, KY
Roozaine, VA
N. Las Vegas, NV
Palm Springs, CA
Bedford Hills, NY
Formingdale, NY
Great Meadows, NJ
Champaign, IL
York, PA
Campbell, CA
Jacksonville, FL
Clifton, NJ
Burlington, MA
Dallas, TX
Londonberry, NH
Egan, MI
Harrisonburg, VA
Norway, SC
Soci City, IA

Circle 115
The company expects to almost double its sales for the '98 season.

Prescription Turf Services, Inc.
Middleton, MA
Prescription Turf Services, Inc., has been a respected turf care provider in the Boston (and surrounding) market throughout the 1980's and 1990's. President Paul Harder reports that it grew by 11 percent in 1997 to record revenues of about $2.2 million.

Agro-Lawn Systems, Inc.
Vienna, VA
Tom Speirs' northern Virginia operation racked up sales of about $2.2 million in 1997. Recently it added commercial turf consulting to its services. It has 45 employees.

Lawn Masters, Inc.
Hawthorne, NY
As Lawn Masters approaches its 30th birthday, it continues to grow, providing services to lower New York State, Hudson Valley. Steady growth has characterized this company that operates out of three locations with 42 employees. President William Carey reports revenues of $2.2 million for 1997.

Clippers, Inc.
Chantilly, VA
Cemetery maintenance is the newest service being offered by Clippers, Inc. Company President John DeBell reports his company totaled $1.8 million in revenues in 1997. It has 55 employees.

Roberts, Inc. dba
TruGreen-ChemLawn
Billings, MT
Dennis M. Roberts reports a great year in 1997 with 24 percent growth. He pegged the '97 revenues at $1.5 million with 30 employees working out of five branch offices.

Prusa, Inc. dba Lawnm*ark
Stow, OH
John C. Prusa's operation in northeast Ohio employs 21 out of three locations. The impressive Lawnm*ark operation that was synonymous with lawn care from Ohio up through the Northeast in the 1980's is pretty much gone except by personal observation. Those not responding to our survey who are able to contact us. The '97 revenues were $2.2 million.

Munie Lawn Specialists, Inc.
Caseyville, IL
This operation, located in a quiet, rural area just across the Mississippi River, kicks up quite a bit of business in the metropolitan St. Louis market. Owner Joseph A. Munie decided to get into the lawn application business after attending a conference in the late 1970's. Since then he's built this operation into full service. He reports lawn care revenues of $1.17 million in 1997, a 21 percent increase over the previous year. The company operates out of two locations.

Nutri-Turf Lawn & Tree
Sv. Warren, MI
This company reports 1997 revenue of $1.25 million, and forecasts upwards of $1.3 for this year. The company has one office that employees 45 peak season workers. Bruce Kopitz reports new services offerings were mycorrhizal fungi and nutrient fixing bacterial injection for tree care.

Foreman Turf Specialties
Shreveport, LA
No new services were added by this Lawn Doctor Franchise in 1998, but it expects to bring in $1.4 million in revenue, a $300,000 increase over 1997. This branch employs 14 people. Jack Foreman is the president.

Ed. note: The LM 100 is an annual look at 100 leading Green Industry professionals. We ranked our lawn care and landscape companies according to 1997 revenues, as reported in an LM survey. Golf course selections are based on reputation, design and the management skill of superintendents. Grounds care facilities were based on past recognition by leading grounds associations and personal observation. Those not contacted and feeling they should be considered for the 1999 LM 100 please contact the editors.

Those companies not listed, but responding to our survey who are also leaders in the Green Industry include the following:

Lawn Care Operators
Turfgrass Company, Inc., Dayton, OH; Green Lawns Plus, Marlborough, MA; Arbor-Nomics Turf, Inc., Norcross, GA; Heritage Lawns, Inc., Plainville, CT; Gro-Green, Plaino, TX; Lawn Cure, Inc., Jefferson, IN; Mike's Lawn Service, Storm Lake, IA; Turf Pride, Inc., Kennesaw, GA.

Landscape Contractors
Dennis' Seven Dees Landscaping, Inc., Portland, OR; Rood Landscape Co., Jupiter, FL; Swingle Tree Company, Denver, CO; CoCal Landscape, Denver, CO; Glen Gate Co., Wilt, CT.

Industrial Landscape Services
San Jose, CA; Byrd's Lawn & Landscaping, Charlotte, NC; Lafiannme Services, Inc., Bridgeport, CT; SKB Industries, Inc., Libburn, GA; Foxfire Landscape Co., Macomb, MI; James Martin Associates, Vernon Hills, IL.

Evergreen Services Corp., Bellevue, WA; LTI, Alpharetta, GA; Bozuto Landscaping Co., Upper Marlboro, MD; Gardeners' Guild, Inc., San Rafael, CA; Kruegers Associated Landscape, North Plains, OR; Del Conte's Landscaping, Inc., Fremont, CA.

Grounds facilities
Our grounds facilities, the following have received awards from the Professional Grounds Management Society:

Andrews University; Arboretum Retail; Franklin Plaza; Blue Cross/Blue Shield of Hartford; Westfield Companies; Waterfront Plaza; Illinois State University; Mohonk Mountain Resort; The Breakers; Richard C. Hocevar Bldg.; Broadmoor Hotel Resort; Lake Forest Academy; Rockville City Hall; University of San Francisco.

Grounds facilities awarded by the National Recreation and Park Association: Ft. Worth Parks & Community Services; City of Plano; So. Suburban Parks & Rec; Littleton, CO; Skokie Park District; Wheaton Park District; Germantown Parks & Recreation; Northbrook Park District; The Channahon Park District.

Lawn care/landscape grounds profiles by Ron Hall, Terry McIver, Nancy Stairs. Golf profiles by Pat Jones. Special thanks to the Professional Grounds Management Society, Hunt Valley, Md.
CALL TO ACTION: The Lawn Quality Protection Act

by TOM DELANEY
PLCAA

Does the loss of any of the following pesticide classes—Organophosphates or Carbamates—get your attention? How about the following products—Orthene, Dursban, Di-azinon, Di-syston, Oftanol, Counter, Sevin—just to name a few? If EPA is allowed to have its way and continues to follow along its current course, these product uses on turf may be limited or lost.

The FQPA of 1996 added several new requirements for testing and risk assessment to the regulatory process for pesticides. EPA must now address aggregate exposure from drinking water, non-dietary residential sources (turf), and residues in food, as well as cumulative exposure from chemicals with a common mechanism of toxicity. These new data requirements call for exposure assessment information not previously considered.

FQPA contains "data call-in" provisions that provide the mechanism for obtaining the data necessary to conduct these new risk assessment evaluations. However, early indications are that the Agency is not planning to use the "data call-in" provisions of the law, and instead will use the very conservative "default" assumptions about exposure and usage information, which may actually be inaccurate and unreliable, and will likely result in the unnecessary loss of pest control products, especially in the non-food markets like turf.

Companies may be forced to sacrifice non-food products to protect food uses. Once these products are lost, it is unlikely that they will be brought back to the non-food (turf) market, even if new data indicates all uses are safe and available under the new requirements. We are still waiting for EPA to reverse the 2,4-D safety clothing requirement that they mandated be put on the label before the complete testing was done. They have had all the tests for two years now.

The conservative "default assumption" approach will have a very negative impact on the non-food pesticide industry. It is imperative that implementation of FQPA be based on the best information available through current science and accurate data so that valuable and safe pest management products remain available.

Action Needed

Recently, PLCAA and several other association sent a letter to Dr. Lynn Goldman, EPA assistant administrator, to call attention to this problem. But the key to our success is YOU. Dr. Goldman has said EPA will not use the data call-in provisions of the law to obtain the data needed for the new aggregate exposure and cumulative risk assessment in the same law. We're asking you to call or write your member of Congress. Tell them to urge EPA to:

- preserve as many valuable pest management protection tools as possible;
- obtain the necessary information through "data call-ins" to establish the safety of pesticide products;
- base decisions on actual pesticide use; and
- establish and communicate uniform policies for consistent FQPA implementation.

Delaney is Executive vice president of the Professional Lawn Care Association of America, Marietta, GA.

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Delaney is Executive vice president of the Professional Lawn Care Association of America, Marietta, GA.

[DATE]

Honorable [NAME]
U.S. House of Representative/U.S. Senate
Washington, D.C. 20515/20510

Dear Representative/Senator [NAME]:

I am in the lawn care business in [TOWN] and am writing you regarding EPA's implementation of the new Food Quality Protection Act (FQPA). EPA is now in the process of deciding which pesticides will be kept on the market and which pesticide uses will be canceled, as required by law. I understand that EPA is making decisions without considering actual pesticide use practices. Also, I hear that EPA is not waiting for sufficient data to meet the law's new requirements. This makes no sense to me.

I have been in the pest management business for [X] years and consider myself a good steward. I use pesticides when necessary to control insects and disease, and practice integrated pest management using all available tools. I know that the pesticide manufacturers can supply EPA with all the data needed to support the continued availability of these products, if the Agency properly implements the law. Please urge EPA to implement the law fairly, by using "data call-ins" and science-based decisions.

Sincerely,

[NAME]
[ADDRESS]
Explaining FQPA

Here's a description of the Food Quality Protection Act and how it relates to you.

By LISA SHAHEEN

For months now, you may have been hearing about the Food Quality Protection Act (FQPA), risk cup and other terms that sound ominous, but you’re not sure exactly what they’re all about. Especially if you don’t happen to be a legislative buff, you may pass by an editorial about regulations or tune out a speech about pertinent regulatory issues.

Now is the time to pay attention.

The FQPA is a 1996 law that amended the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA) and the Federal Food, Drug and Cosmetic Act (FFDCA). It calls for very substantial revisions of the pesticide law, and paves a new way in which pesticides are regulated.

The problem is that every active ingredient has hundreds of applications, and this is where it gets complicated. For example, one active ingredient may be effective against roaches, but is also used for some lawn pests and agricultural uses. This isn’t a problem when considering one application at a time, but the FQPA considers the sum total of risk associated with a given chemical, and combines all its potential uses. Risk is assessed in two ways: aggregate or cumulative.

1. Aggregate risk assessment—All the potential uses for a particular chemical are added together.

2. Cumulative risk assessment—Any risks associated with a given chemical, plus any chemical with a similar mode of action to the first chemical, must be added together to assess how risky it may be. For example, when assessing chlorpyrifos, the risk from other chemicals that aren’t chlorpyrifos, but act the same way as chlorpyrifos have to be factored in to measure cumulative risk. For chlorpyrifos, this would include all other organophosphates, such as malathion and diazinon.

According to the FQPA, once the type of risk is defined, how much of that risk is allowable must be decided, and this is where the “risk cup” enters the picture. For each chemical or class of chemical, the United States Environmental Protection Agency (EPA) creates what’s called a risk cup, which equals the total amount of allowable risk exposure.

If all the potential risk for a given chemical, and the chemical similar to the first one are poured into a cup, and it “overflows,” then it’s at its breaking point. To lessen the risk and keep the cup from overflowing, the EPA deems action necessary.

There are three ways to reduce risk in the cup.

1. Eliminate Uses—A manufacturer may decide to get rid of all its indoor (structural) uses in order to continue the agricultural uses of the same active ingredient.

2. Risk Mitigation—To reduce risk associated with the use of a product, manufacturers might mandate unreasonable precautions, such as wearing head-to-toe protective equipment each time a product is handled. Of course, this is one way to reduce risk, but it’s not very practical.