JON ALLBUTT on the disposal of chemical containers and tank washings

As NPTC examiners we listen as the Foundation Module Test candidates recite the litany of options available for disposing of old chemicals, used containers and tank washings. It sounds impressive enough until you look closely at those options and try to see how they might work on a golf course.

Take for example the disposing of used containers. The problems of finding a suitable site for burying are so great as to make this option unworkable on a golf course, similarly the option of burning certain types of container is also a non-starter. Most containers find their way into a skip or on a rubbish tip... try explaining that to the Inspector when he or she visits and starts asking those awkward questions! So what is the best way of dealing with the problem?

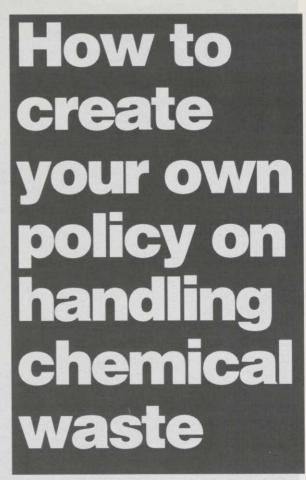
All containers must be rinsed and the rinsings put into the spray tank. The empty containers must then be rendered unusable again, with puncturing in several places being the best way of ensuring that they are not re-used for carrying petrol, or worse! The containers should then be kept in a safe place until there are enough to justify a trip to the council tip, enquiring of your local authority first to be sure you take them to the right place. An alternative strategy is to use the disposal services offered by the manufacturer or distributor – both Chipman and Envirogreen (Maxwell Hart) offer such a service.

There are no options available for disposing of unwanted concentrate. An authorised waste disposal contractor is the only route available for this job. Remember, it is a breach of the Pesticides Regulations to store non-approved pesticides and this includes old wood preservatives.

The options for disposing of tank washings also become a problem when looked at in the context of the golf course. The options of constructing a soakaway or using a 'designated area' fall down when you approach your local office of the National Rivers Authority. In general you can expect your local official to be less than enthusiastic! There are units available that will filter the pesticides out of the washings, though these are more suitable to those who use much more pesticide than we do and are also quite expensive to buy.

It is possible to have a specially constructed wash down and rinsing area that drains into a tank which is periodically pumped out and disposed of by a licensed contractor. You will need to take care that rain does not fill the tank by fitting a cover over the drain when not in use. The best method is to spray out the washings on an area compatible with the product label approval, for example if greens have been sprayed with a selective weed-killer, the rinsings and tank washings can then be sprayed on the fairway. In certain circumstances the tank washings can be re-used for another spraying job providing the same product is to be used again. If the washings are to be re-used they must be kept in a sealed container properly labelled to avoid misuse. The new edition of the Amenity Code of Practice for the

use of Approved Pesticides is in the process of being revised and reprinted. It will contain advice on how the job of using



some pesticides is now subject to risk assessments under the COSHH Regulations and having a copy of this Code of Practice is an essential first step in forming a policy on the handling of chemical waste. Copies will be available from the NTC in the autumn, with details appearing in this magazine.

There is a lot of concern about the pollution of water and the NRA is responsible for enforcing the new Regulations under the Water Act and the Pesticides Regulations. The very new Environment Protection Act will also have an impact for users of potential pollutants of any kind.

To avoid the risk of prosecution under one or all of the Regulations now in force, make sure you have a clearly written policy on how you will tackle the problem of disposals. Before you establish your policy make a draft and consult those listed in the Code of Practice. After their comments have been taken into account, introduce the policy to your staff and make sure they follow it. It will be necessary to carry out periodic checks to make sure the policy is being carried our correctly – don't assume that staff will follow it to the letter!

 Jon Allbutt will be presenting his highly informative lectures on COSHH and the Food and Environment Protection Act at BIGGA Management Courses in November.

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