

# The Green Pages

*A compendium of news and opinions about government, golf and the environment*

## Don't ignore any notices from state

Two important things are taking place within the SARA Title III Program:

- Expect more enforcement activity. The State Emergency Response Commission will be working closely with the EPA to administer penalties to facilities which are in violation of the provisions of the Title III program. The penalties in this program can be substantial.

- Expect your facility's name to come up eventually if you are using Extremely Hazardous Substances (list is available from Burt McKee, UAP Florida, 813-621-4433). If you receive a Notice of Violation from the state or any other paperwork that gives a response date, *do not ignore it!*

If you do not use the chemicals or if you do not meet the threshold, then let the state know that. Once a response date has passed without a response from the facility, there is a good chance a penalty will be invoked.

- FTGA

## State provides help dealing with OSHA

Do you need help providing a safe workplace? Would you like assistance in developing training and safety programs? The state of Florida provides a service designed to help companies deal with OSHA requirements.

The program is called the 7CI program. For more information, call 904-488-3044.

-FTGA

## EPA Proposes Pesticide Storage Regulations

As authorized in the 1988 amendments to the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), the U.S. Environmental Protection Agency is proposing regulations on the storage of pesticides. These regulations are scheduled to become final in late 1991, with compliance effective two years later.

The goal of the storage regulations is to provide minimum, reasonable federal storage standards. The overall objectives of the storage regulations are to minimize human exposure, improve fire protection, ensure safe and effective spill management and cleanup, and codify good management practices.

These proposed regulations contain minimum standards for all facilities that store more than 11,000 pounds (5,000 kilograms) of pesticide products. Industry surveys of facilities and practices reveal that many agrichemical dealers and distributors meet or exceed the standards in the proposed

regulations. The intent is simply to achieve compliance by the segment of the industry that does not currently meet these minimum standards.

To meet the general standards, pesticide storage facilities must be:

- Secured and posted with warning signs;
- Floored with sealed concrete to prevent seepage through hairline cracks;
- Equipped with electricity, water and adequate ventilation;
- Equipped with two sets of personal protective clothing for spill cleanup or other emergencies;
- Built to local fire protection codes;
- Provided with secondary containment for bulk storage.

The proposed regulations also require specific operational procedures for all storage facilities. These procedures include accident prevention, inspections of containers, and employee training.

A key issue for the agency is determining who must comply with these regulations. Currently, the agency is proposing to exclude any farm, commercial applicator or other facility that stores less than 11,000 pounds of pesticide products.

Another issue is the requirement for training. Concerns have been raised by industry representatives during recent field trips that EPA regulations potentially overlap with OSHA regulations, causing confusion, compliance difficulties and duplicative training time for their employees. If employers comply with OSHA training requirements, should they be exempt from EPA training requirements?

## Reference Library

Recently released professional literature



*A Manager's Guide to Environmental Compliance*, Florida Chamber of Commerce. Lay-language overview and explanation of federal environmental laws and regulations prepared specifically for managers and supervisors to help avoid costly penalties, legal fees, down time and court costs. \$37 plus UPS shipping; 800-940-3034 or 904-222-5520 (FAX).

## Seeking the unvarnished truth

...Charlatans abound whenever an emotional issue arises which deals with unknown, potentially hazardous materials. These folks are usually better speakers and writers than knowledgeable scientists and do not have to prove anything. When faced with data from university research, they simply say that it is tainted by the influence of the anti-environment agrichemical combine. Period.

To cope with this kind of reaction, the USGA Research Committee has embarked on a three-year national research program to help us:

- Understand the effect of turfgrass pest management and fertilization on water quality and the environment.
- Evaluate alternative pest control measures in integrated turf management systems and
- Determine the human, biological and environmental factors that golf courses influence.

The intriguing thing about this project is that it seeks the unvarnished truth. If

our present practices are faulty, golf will have to clean up its act.

In addition to information gathering, a manual will be developed with the GCSAA to provide consistent information on integrated turfgrass management practices that ensure environmental quality. The program is not meant to cast doubt on recent research efforts, but to expand the scope of research and involve all areas of the country.

Local-level research is necessary to help us cope with problems unique to specific areas. These programs need and deserve the support of golf and golf course superintendents' associations. National-level funding is becoming more difficult. Maybe this is the time for everyone to become involved on a more personal basis.

*-James Latham, Director, Great Lakes Region, USGA Green Section*

## Private sector does it better

...We want (the Clean Air Act) to have a positive effect on our environment and to make our country a healthier place to

live. But we don't need to bankrupt American businesses in the process. I will monitor the impact of these changes to the law — the first adjustments to the Act in 20 years — to be sure that they are achieving their intended goal of a cleaner environment as efficiently as possible.

Our environmental consciousness has reached the corporate level as well. Witness McDonald's recent announcement that it will replace styrofoam containers with biodegradable packaging. This reflects the American consumers' demand for more responsible treatment of our planet and their willingness to sacrifice convenience for environmental concerns.

It is interesting that the American people rejected the more extreme environmental initiatives on the Nov. 6 ballot all across the nation. It would appear that they have concluded once again that the private sector can do the job better than government bureaucracy and regulation.

*-U.S. Congressman Andy Ireland, Report to Florida's 10th District, December 1990*

The agency welcomes comment on these issues, the proposed storage regulations and their potential impact on the golf course industry. Please direct these comments to Rob Denny, Janice Jensen or Tracy Bone, Pesticide Management and Disposal Staff, Environmental Fate & Effects Division (H-7507C), Office of Pesticide Programs, EPA, 401 "M" Street SW, Washington, DC 20460; telephone 703-557-5288; fax 703-557-9309.

*Column by Robert Denny, Office of Pesticide Programs, U.S. Environmental Protection Agency in GCSAA Government Relations Briefing, October 1990. Reprinted with permission.*

## GCSAA Government Relations Briefings

*(Every month, members of the Golf Course Superintendents Association of America receive a two-page briefing on government relations developments affecting the golf industry. Below are summaries of the topics covered in the last three briefings. If your superintendent is a GCSAA member, he should have copies of the complete briefings on file. If he isn't, call 1-800-GSA-SUPT for membership information.)*

• What do you do with old, used tires? Almost 60 percent of worn tires are disposed of illegally.

• Florida is one of several states that has launched a pilot program under the Endangered Species Protection Act.

• An international treaty will halt production of halon, a popular fire-fighting agent, by the year 2000. Superintendents considering halon systems for their pesticide storage buildings or other club facilities should stay aware of existing options.

• Until Dec. 22, EPA's underground storage tank efforts have centered on after-the-fact cleanup; now the agency intends to step up compliance enforcement.

• Users are demanding better, more uniform material Safety Data Sheets (MSDS's).

MSDS's, which are provided by manufacturers for each of their products, are a vital part of golf course superintendents' Hazard Communication Programs.

• The U.S. Supreme Court refused to review a case in which a developer was sentenced to a three-year prison term and fined \$200,000 for illegally dumping landfill in a wetlands area.

For more information on wetlands, contact the U.S. Fish and Wildlife Service, Department of Interior, 1849 C Street, NW, Washington, DC 20240.

• The Netherlands plans to reduce chemical pesticide use by 50 percent by the year 2000.