

Along with Joel Jackson, Darren Davis, Tom Alex, Cary Lewis, and others, I have participated in several conference calls over the past few months with the EPA, the USDA, Bayer Corporation, and other stakeholders regarding the future of Nemacur. I was the only one of our group able to sit in on the last call, so I'll do my best to give an update on this critical issue.

Going into this, I never realized the EPA had such a concern with worker safety and golfer exposure. I thought the basis of concern with Nemacur was ground and surface water contamination. So far, we've spent more time discussing exposure to golfers and golf course workers, with water issues coming to the forefront near the end of the last call.

We have moved past (I hope) the EPA's early opinion that Nemacur should be "off labeled" for use on "Florida-

type" soils (sands), and that golf courses do need it for use on areas other than greens and tees. They now understand that golf courses only use fenamiphos once or twice a year on greens and tees, and spot treat other areas of the golf course as needed, rather than wall-to-wall applications.

We've also done our best to explain how we apply the product, both granular and liquid, the timing and amounts we typically apply, how we water it in, and the safety precautions we take for both our workers and the golfers who play our golf courses. We've discussed in detail the differences in exposure risks from using drop vs. rotary spreaders vs. spray applications. I've shared with EPA the fact that my spray tech of 19 years has cholinesterase checked twice a year with no problems noted. We've explained that most of us have tried alternative nematode control products with little or no success, and that losing Nemacur would be devastating to Florida's golf industry, with unintended

negative environmental impacts likely to occur. We've assured them that we care about our employees and the environment.

I'd like to be able to say I am optimistic about our chances of continuing our use of fenamiphos on golf courses. The fact that we are participants in these proceedings and that the EPA has listened to us and has a more favorable view of our "real world" uses of Nemacur is encouraging, but EPA's history dictates caution. From the EPA's very beginning, regulatory action has been based more on politics than science, and while we're now involved in a process that encourages us to think that times have changed, we need only look at the recent ruling on Dursban to indicate otherwise. The most encouraging aspect is Bayer's commitment to this product and this battle.

The real stumbling block seems to be how far apart the EPA and Bayer are on interpretation of risk analysis data. Each has its own studies and they are miles apart on their conclusions. I think the outcome rests with the resolution of this data. Not having seen either side's data (and probably unable to understand it if I did), I can only make the generalization that it seems like the EPA multiplies the safety factor and tries to write regulations on worst-case scenarios. The significance of PPE's (personal protective equipment like respirators, rubber boots and gloves, suits, etc.) is one of the biggest issues of contention between Bayer and the EPA.

From my perspective, it seems the EPA is trying to "idiot-proof" these regulations. Users are not to be trusted to do the right thing for their employees, the environment, or their pocketbooks; and so, too, they are not given the opportunity to demonstrate common sense, environmental responsibility, and economic feasibility. It rankles a bit to think that we as professionals are regulated as if we're idiots or potential criminals, but in our modern "victimhood" society, you understand why they work this way.

The fly in the ointment for either side of the issue is enforceability. The EPA must endeavor to write a law that is enforceable, but in so

Important Conference Calls

Mark My Words



Mark Jarrell, CGCS

doing, common sense and practicality often get swept away in a flood of regulatory gobbledygook. During this last conference call, the EPA challenged us to help come up with suggestions for label restrictions to reduce MOE's (methods of exposure).

Not being the sharpest pencil in the box, the only thing I could come up with was to limit the amount of time an employee could spend applying Nemacur, whatever it was determined through EPA and Bayer's risk analysis data. In other words, if EPA says that any one worker cannot work with

Nemacur for more than two hours a day, then the golf industry could live with that. This, in my opinion, is much more enforceable than regulating acreage per day or other restrictions, since we all recognize that not every golf course operates the same way.

Why limit yourself on a Monday if you're closed. If you're going to bend the rules, would a superintendent more likely fake his log book, or subject an employee to overexposure? The EPA didn't like my suggestion, something about not practical for non-turf users of Nemacur. I didn't quite understand

this – aren't labels specialty written now? No other recommendations came forth during this call.

As for where we stand now, the EPA is going to initiate water monitoring at both agricultural-type sites and drinking-water sites to get a scope of the problem as it now stands. Bayer and EPA will continue to try breaking the impasse over their respective risk analysis data. I have not heard a timetable of when this assessment must be completed, but I'm guessing we have more conference calls ahead of us before a decision is rendered.

2001 Florida Green Photo Contest

Category 1 - Wildlife on the Course: includes mammals, birds, reptiles, amphibians.

Category 2 - Course Landscape: Formal Plantings: includes annuals, shrubs, trees, entrance and tee signs.

Category 3 - Course Landscape: Native Plantings: includes aquatic vegetation, grasses, shrubs, trees and wildflowers.

Category 4 - Scenic Hole Layout Shots: includes sunrises, sunsets, frosts, storms and any other golf hole view.

Prizes

- 1 st Place (\$100) and 2 nd Place (\$50) in each category.
- Editor's Choice-Best Overall Photo - \$100.
- All winning entries published in the Fall 2001 issue.

Easy Rules

1. Color prints or slides. Prefer prints. Only one entry per category.
2. Photo must be taken on an FGCSA member's course. Photo must be taken by an FGCSA member or a member of his staff.
3. Attach a label to the back of the print or slide which identifies the category, course and photographer. DO NOT WRITE



Category 2 — Course Landscape Formal Plantings. Rose garden on the 18th hole. Disney's Lake Buena Vista Club. Photo by Joel Jackson.

- DIRECTLY ON THE BACK OF THE PRINT. Each photo shall be attached to an 8.5" x 11" sheet of paper. Attach the print to the paper using a loop of masking tape on the back of the photo. Slides must be easily removable for viewing.
4. A caption identifying the category, course and photographer should be

- typed or printed on the sheet of paper below the print or slide.
5. Judging will be done by a panel of FGCSA members not participating in the contest.
6. Mail entries in a bend proof package to Joel D. Jackson, 6780 Tamarind Circle, Orlando 32819. No entries accepted postmarked after August 1, 2001.