

# Test course super endorses self-audit

BY MARK LESLIE

The initial results are in from the first golf course superintendent to use Hall-Kimbrell Environmental Services' self-audit kit and he is sold on its use.

"I'm very, very impressed with the audit," said Richard Stuntz of Alvarado Golf and Country Club in Lawrence, Kansas, next door to the Golf Course Superintendents Association of America headquarters.

"The GCSAA is aiding Hall-Kimbrell with this, and we feel very strongly that golf courses and our membership have to take a proactive stance on environmental issues," Stuntz said. "We feel very strongly that we have to be proactive and regulate ourselves, so that lawmakers will feel it less necessary to come in and enact laws."

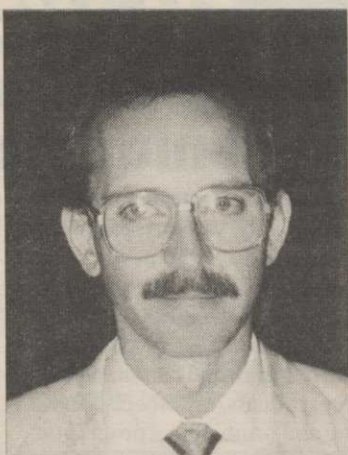
"We will show that we will do things from a safety and environmental standpoint, that we are sensitive to it. Someone who is doing an environmental audit is saying that in a loud way."

## Getting a jump

Faced with the prospects of tough environmental laws getting even tougher, golf course superintendents can get a jump on the laws, and save a lot of money, by signing onto the program.

The audit is being tested at a handful of golf courses and is just now available to the members of GCSAA, which has been updating its members on progress of the audit.

"It really started with the board of directors and the government relations committee of the GCSAA at the national level," Hall-Kimbrell project manager Steve Wharton said. "Because of the pressures they are under across the country from the various levels of regulatory agencies they needed to address the issue. They did not have the resources internally within the organization ... and they went



Steve Wharton

through a selection process ... of environmental engineering, analytical firms across the country and they settled on Hall-Kimbrell."

"We want to help superintendents make their golf courses as environmentally pleasant and safe as possible," said John M. Schilling, executive director of GCSAA.

Hall-Kimbrell, which is headquartered in Lawrence, Kansas, has worked closely with GCSAA in the last year to develop the client-assistance program, and the first phase in that program is the self-audit procedure.

The self-audit is designed to assess how well the course is complying with environmental laws, identify programs that are in place in environmental management, and assess the risk in the workplaces and help to reduce potential liability.

## Above and beyond

"So what we will be recommending will be not just response actions that will simply bring them in compliance but in many cases actually take them beyond compliance," Wharton said. "We call them 'best-management practices.' In other words, what may be required in an environmental and proactive state like California, New York or Connecticut may not be required if you are in Idaho, Nebraska or

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Montana or someplace that is not quite as proactive... But our recommendations will be the same. In other words, we would say, 'This is what is required in your area to be in compliance, but this is what we recommend as the most prudent response.'

In fact, Alvarado's Stuntz said the most time-consuming part of the self-audit will not be completing the 500-question, eight-part questionnaire but rather following through on the recommendations Hall-Kimbrell makes after receiving the questionnaire.

"I will guarantee that as thorough a job as Hall-Kimbrell does that if you were to do all they advise it would be impossible," Stuntz said, "but they tell you what to do on a priority basis. There are several different levels of priorities on action. Certainly where you are not complying with the law, that is high-priority and I expect to make that type of correction almost immediately regardless of cost or time. Other things will improve the operation or make it safer. Others will take care of issues that haven't reached a particular region yet — underground storage tanks, for instance."

"They (Hall-Kimbrell) are amazing," he said. "They have a lot of knowledgeable people working on this project. I have a pesticide that I want to get rid of, and they have an expert in that area who is work-

ing with me to handle it. When you want to get rid of a pesticide it is a hazardous waste, and they pass me on to another man, who knows who I have to contact, where to go, and how to get approval, et cetera. If I'm concerned about an underground storage tank I speak to another person who is an expert in that field."

Stuntz added that the "depth and breadth of the subjects covered in the audit is far beyond what we as practicing superintendents can contend with... I have a college degree in agronomy, I'm always taking courses and I feel I keep myself pretty well informed, but developments in all these fields have gone beyond our capacity to keep up, like with all the laws. I would have to spend full time keeping up with them and I have a couple of other things to do."

## Service we all need

"I think this is a service that we all need."

The GCSAA and Hall-Kimbrell feel a major benefit of the self-audit is cost savings. When outside experts come in to audit a course it can cost in the order of \$1,000 a day, Wharton said, and the final cost is anywhere from \$5,000 to \$20,000 for a comprehensive audit. The cost of the self-audit is \$725 for a GCSAA member and \$900 for a non-member.

Wharton said the self-audit actually pays for itself if you instead face the prospects of a fine for non-compliance with an environmental law.

## Fines are heavy

"Most fines — civil, and there are even criminal penalties associated with violation of many of these laws — run anywhere from \$5,000 to \$10,000 a day. So it's a situation where if you feel you can't afford to do it you probably can't afford to not do it," he said.

"One of the things that we've heard is that if the superintendent has a program in place where he can demonstrate to the regulatory agency that, yes, he is proactive, that he's doing this and this to monitor his course, very seldom have they imposed these fines and penalties... Whereas if the superintendent pleads ignorance and shows no effort to take action, they can take pretty heavy action against him."

"Aside from that," Wharton said, "if you have an underground storage tank that may leak and you've not done any testing ... your remediation or abatement costs could run into the thousands of dollars."

Wharton said that when you weigh the cost of the self-audit against having a mishap or fine, it's like having an insurance policy. Several major insurance carriers have contacted Hall-Kimbrell about incorporating the program into the underwriting of their clients, he said, and it is "very likely" a deal will be made with one or more insurance carriers sometime in April or later this spring.

Superintendents everywhere will be keeping abreast of the self-

## Kit spells it all out for supers

Hall-Kimbrell's environmental self-audit package includes an instructional video, printed materials and a compliance booklet for superintendents to use.

The program was designed after project manager Steve Wharton "visited 22 golf courses from coast to coast and visited all the states that are particularly sensitive to environmental issues, as well as the ones where there are a predominance of golf courses — California, Florida, Michigan and so forth."

The kit's 500-question questionnaire addresses eight major environmental practices:

- Worker health and safety.
- Pesticide usage.
- Water quality.
- Hazardous waste.
- Underground storage tanks.
- Worker right to know.
- Community right to know.
- Indoor air quality.

Initially a Hall-Kimbrell expert reviews each report before it is returned to a course along with computer-generated findings.

Wharton said followup work will be done after the report is returned.

"We are developing training programs to help (GCSAA) members comply with the federal hazard communications standard, the worker right to know law, programs for the monitoring and maintenance and operation of underground storage tanks," he said. "The community right to know laws are somewhat confusing; there are 39 different variations on them at the state level. So we are putting together some programs to help people comply with that as well."

People may obtain the package through GCSAA Membership Services, 1617 St. Andrews Drive, Lawrence, Kansas 66046; 800-GSA-SUPT.

audit program. As Stuntz said, "My priorities have changed over the last few years. Environment is getting higher and higher on my priority list all the time. The outlook on the environment has changed — personally and in the industry as a whole."

"I believe it's true that we have to do these things if we're not going to poison ourselves to death," he added. "I feel we have to be responsive. Pesticides are an important part of the industry; they need to be used, and used safely."

## Laws expected to get tougher

Environmental laws that have become increasingly more strict in recent years will be tightened even more in the years ahead, according to Hall-Kimbrell's self-audit project manager.

Steve Wharton declared, "We can almost guarantee that the laws will get tougher at the state and federal level both."

"There will be a federally mandated law that is transferred to the states for enforcement or implementation," he said. "The Federal Fungicide, Insecticide and Rodenticide Act (FIFRA) is that way; it was implemented in 1972 and has been amended three times since then to be more stringent, and we expect it to be amended again this year..."

"Then you have the new federal law for underground

storage tanks that just was passed last fall."

Wharton said a federal ground water protection act will become law during this current Congress.

"There are literally no standards right now protecting most of the ground water in the United States. Whatever comes into place in this next year will be the first wave, the first stage, in that," he said.

Wharton said the Safe Drinking Water Act "does protect some water but it's usually surface water... Yet, even some golf courses fall subject to those regulations because they have wells for drinking water and irrigation."

Wharton also warned that the Farmworker Protection Act, which does not now apply to golf courses, soon may.

"It's oriented toward the agriculture industry, but there

is a movement afoot now to make it apply to golf courses," Wharton said. "Some of the chemicals used on farms are also used in the golf course and lawn care industries."

A number of states around the country are implementing new, stringent laws, Wharton said, adding, "California, with Proposition 65, is very stringent in many areas. New England though is just as stringent from an overall environmental-concern standpoint. The state of Florida has some very proactive water-quality laws because of the fact that they have a very shallow water table and water is such a protected resource."

"Many of your coastal areas are also tough, but you have some inland states, too — Michigan, Illinois, Iowa — that are coming along with some new laws."