

## NCA adopts hazwaste program

Citing the use of hazardous and toxic substances at clubs, the National Club Association has announced a plan to provide on-site help to private clubs by scientists and safety experts.

The NCA has joined with Hazco International Inc. to provide a comprehensive, full-service, Environmental Liability Management Program that will help clubs comply with the changing OSHA and EPA regulations and documentation requirements.

The price tag for the basic program is about \$1,700 per year.

"Golf, country, yacht, and city clubs — particularly golf clubs — regularly use up to 200 hazardous and toxic substances, ranging from anti-freeze and cleaning fluids to herbicides and pesticides," the NCA said, adding that clubs must be aware of every one of the substances to provide a safe environment for their workers, members and the community at large.

The NCA said compliance with regulations will be fundamental in defending a club if a lawsuit arises from storage, use or disposal of toxics.

Under the NCA/Hazco program:

- A Hazco safety expert will conduct a comprehensive customized, on-site training class for club employees to satisfy the Right-to-Know requirements established by OSHA. This class will teach all club employees how to handle covered toxic substances and the emergency procedures involved.

- Hazco, which is a subsidiary of Chemical Waste Management, Inc., will provide a customized Written Hazard Communication Program that meets OSHA documentation requirements.

- A comprehensive, on-site toxics audit of substances at each club will be done by Hazco, which will supply the club with a full written audit report.

- Hazco will perform an environmental safety audit and make recommendations on how to correct safety and compliance omissions or irregularities.

- Hazco will meet with club management to discuss and make recommendations on the audit, procedures, and possible dangers at the club; and the company will monitor the club's response to these recommendations.

- Hazco will provide or arrange other optional services, including the testing, removal and/or repair of underground storage tanks, as well as removal services for liquid hazardous materials.

NCA said its Environmental Liability Management Program will serve as the club's hands-on environmental safety auditor for each year the club subscribes. It said the services will be highly customized, "unlike those available in 'do-it-yourself' compliance packages."

Meanwhile, the NCA said it is working with Hazco to develop programs to help clubs finance their safety, compliance, and liability-control services, and the NCA is meeting with suppliers about offering substantial discounts on the purchase of covered substances.

More information is available from Legare Van Ness at the NCA's Washington, D.C., office.

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