

# Superintendents have options

Compliance to the OSHA hazardous communication law can be achieved in several different ways.

- The superintendent can obtain materials and put together his own program, doing his inventory and gathering his information together, safety data sheets, et cetera, and sitting down with his employees and training them.

"That's fine if he has the time to do all of that," says self-audit project manager Steve Wharton of Hall-Kimbrell Environmental Services.

- The superintendent can buy (for about \$20 from his regional OSHA office) a package that has boiler-plate forms to go use in their chemical inventory, requests for safety data sheets, some suggestions on the plan, et cetera.

Again, at that point, it's a do-it-yourself project.

- The superintendent can purchase any one of a number of pre-packaged programs that usually include a videotape and more-or-less boiler-plate programs that include the various elements. Those programs then

have to be made specific to the particular course. Those programs can cost anywhere from a couple of hundred dollars to \$500.

- The superintendent can actually contract with a firm to come in and review the inventory, review the safety data sheets, fill out the requests for those if they don't have them in their files, and conduct the training at the course. This usually costs about \$1,200 to \$2,000 for the initial training, depending to a certain extent on the size of the facility, the number of materials it has, the number of employees it has.

The National Club Association has joined with Hazco International Inc. to provide such a service to its members for a basic program cost of \$1,700.

Hall-Kimbrell, which has produced its program in coordination with the Golf Course Superintendents Association of America, can provide either the self-audit material or perform the audit itself, according to Wharton.

"We want to try to give them (superintendents) the proper perspective about where they stand and where they need to be and

how quickly they have to get there — which in this case was yesterday," he says. "If you do not have a program right now you're in violation of federal law."

"Now if I were a golf course superintendent and I had an OSHA inspector come in, I would much rather be in a position to say I have a program or am moving towards compliance and this is what I've done, as opposed to confessing ignorance of the law," Wharton says, "because that is no excuse and, if anything, it can worsen your situation with the enforcement agency ... and could increase the extent and severity of the fine."

"This is just one issue the courses have to contend with. That's why we put our program together because sorting out what's out there, both at the federal and state level, is a very involved and time-consuming process," he adds, "so we are trying to give these guys some tools so they at least can say, 'This is where I stand; maybe I don't have all the resources available to make my operation in compliance, but at least I know what to do and where I'm going and how I can get there.'"

## Other issues felt important

Environmental expert Steve Wharton, who is traveling the country talking with course superintendents about adhering to the laws, says several major issues rank close to one another at the top, but "hazard communication is certainly one of the most universal because it is a federal standard and it does apply to all golf courses."

Various other regulatory requirements need attention but they may be somewhat regionalized, he says. He cited ground-water concerns as an issue in the desert Southwest, California and Florida, and the coastal environment as an issue in the New England area.

"The whole issue of pesticide use — handling, application, disposal and storage — that's one of the most obvious concerns throughout this industry," he says. "Worker protection is certainly a big issue," as in how it applies to the hazard communication standard."

## Talks scheduled with supers around country

Steve Wharton, GCSAA project manager for Hall-Kimbrell Environmental Services, Inc., in Lawrence, Kansas, has spoken to several GCSAA chapters about what superintendents must do to comply with the environmental laws. Upcoming talks include:

- June 13 to Old Dominion GCSA at Richmond, Va.
- June 20, tentatively, to Central Pennsylvania GCSA at Camp-Hill, Pa.
- June 27 to West Texas GCSA at Lubbock, Texas.
- July 11 to Metropolitan GCSA at a New York site to be determined.
- July 25 to Tidewater TGA at Kitty Hawk, N.C.
- Aug. 8, to North Texas GCSA at Carrollton, Texas.
- Sept. 18, tentatively, to Philadelphia GCSA at Malvern, Pa.
- Oct. 2 to Wisconsin GCSA at Pewaukee, Wisc.
- Oct. 13 to Peaks and Prairies GCSA at Billings, Mont.

## OSHA compliance kits available

The Occupational Safety and Health Administration has made available a kit to help employers comply with its expanded hazard communication standard.

The kit identifies the components of the required written hazard communication program and worker training program. It explains how to use material safety data sheets (MSDSs) supplied with hazardous chemicals and how to identify and list hazardous chemicals present in the workplace.

The kit is available for \$18 for domestic users and \$22.50 for foreign users through the Superintendent of Documents, U.S. Government Printing Office, Washington, D.C. 20402-9325; telephone 202-783-3238.

Called the OSHA 3104 Hazard Communication Compliance Kit, its GPO order number is 929-022-00000-9.

# State laws called ever-changing

Trying to comply with OSHA's hazardous materials regulations is "like trying to hit a moving target," says Steve Wharton of Hall-Kimbrell Environmental Services.

Twenty-three states and the U.S. Commonwealths of Puerto Rico and the Virgin Island have variations to the federal law and the regulations are "always changing, evolving," Wharton says. "States are passing more stringent regulations all the time; they copy one another..."

"That's why it's a monumental undertaking but you have to take a comprehensive approach to it in being knowledgeable not only of what's going on in your own state but what's going on next door or across the country."

Wharton says many states have used California's Proposition 65 as an acid test of what can be required.

He says about 15 states are now drafting laws patterned after Proposition 65.

"So it's an issue that's not going away. We're moving toward more and more stringent regulations all the time. It's an issue that these fellows (superintendents) have to be concerned about for the viability of the industry," he says.

Wharton says a "curious note" he has found is that although "we feel that the level of compliance has to do with the level of a club's resources, that's not true" in the case of meeting environmental regulations.

He said municipal operations are in compliance with laws more often than are private clubs.

"That's been my experience in polling these people across the country," he says.

The reason? "It's because the cities, counties and other government levels running courses are in the mainstream of regulatory and enforcement activity and they have risk managers and compliance personnel. And because the golf course may be part of that overall municipal operation they fall subject to those same. 'We need to get a hazardous communication in place and here's what to do...'"

The Connecticut and New York state plans cover public employees only and OSHA is exercising concurrent private-sector federal enforcement authority in California, Wharton reports.

Wharton listed the states with OSHA-approved plans that differ from the federal

law, and the officials in charge, as:

Jim Sampson, Commissioner  
Alaska Department of Labor  
P.O. Box 1149  
Juneau, Alaska 99802  
907-465-2700.

Larry Etchechury, Director  
Industrial Commission  
of Arizona  
800 W. Washington  
Phoenix, Ariz. 85007  
602-255-5795

Ron Rinaldi, Director  
Calif. Dept. of Industrial  
Relations  
525 Golden Gate Ave.  
San Francisco, Calif. 94102  
415-577-3356

Betty L. Tianti, Commissioner  
Conn. Dept. of Labor  
200 Folly Brook Blvd.  
Wethersfield, Conn. 06109  
203-566-5123

Mario R. Ramil, Director  
Hawaii Dept. of Labor  
and Industrial Relations  
825 Mililani St.  
Honolulu, Hawaii 96813  
808-548-3150

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100 North Senate Ave.  
Indianapolis, Ind. 46204  
317-232-2663

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Iowa Div. of Labor Services  
1000 E. Grand Ave.  
Des Moines, Iowa 50319  
515-281-3447

Carole Palmore, Secretary  
Kentucky Labor Cabinet  
U.S. Highway 127 South  
Frankfort, Ky. 40601  
502-564-3070

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