

Violating hazardous materials laws

BY MARK LESLIE

Maintaining a hazardous materials safety and waste disposal program correctly is expensive, but it's "much more expensive to handle it wrongly," an expert told lawn care professionals in Ohio in December.

Spending time and money to do the job right may save a golf course superintendent big money, time and headaches that could last for years, Mary Malotke told an audience at the Ohio Turfgrass Conference and Show.

"Some violations can bring a \$25,000 fine and three years in prison, or both, for the owner of the business or for the employee who mismanages chemicals," said Malotke, president of Tencon, Inc., a technical environmental consulting firm in Cincinnati, Ohio.

People who handle chemicals have to worry about breaking the hazardous waste laws, Malotke said.

"Once you can get caught you get on what I call the National Hit List," she said. "Soon the EPA, immigration, sewer inspectors, will all pay a visit... Even if you have no violations, you must lose time with them and with lawyers in the process."

Malotke said the Occupational Safety and Health Administration's

most issued citations in hazardous communication are handed down for:

- 1) No written program.
- 2) No employee training.
- 3) No material safety data sheets (MSDS).
- 4) No in-plant labels on containers storing chemicals.
- 5) MSDS files not up-to-date.
- 6) No chemical inventory.
- 7) No written chemical hazardous determination.

Malotke said superintendents and other managers must train existing employees as soon as possible and new employees be-

fore they start work. "And you must retrain when new chemicals or new hazards are added to the workplace," she said.

Keep a log of training and have the employees sign a statement that they were at the training, she suggested. Also maintain records of any employee exposure, test each employee, and make a note of any questions along with your answers.

While saying that regulations regarding hazardous materials, hazardous substances, hazardous chemicals and hazardous waste are "a maze we don't really know how

to walk our way through or that takes a tremendous amount of time to walk through," it must be done. Or the superintendent might face dire consequences.

"Become familiar with the laws dealing with hazardous wastes," she recommended. "Learn to recognize hazardous materials and situations. Learn how to protect yourselves."

The Department of Transportation regulates transportation of hazardous materials, labeling, quantity size and packaging.

OSHA deals with how people use materials in the workplace;

Federal and state emergency response numbers:
Federal Spill Response 800-424-8802; DOT 202-426-1830.

how to keep the workers safe and how to store the materials; administers compliance with the federal right to know ordinance; and is a place employees can contact to get safety help.

And, once chemicals are used and no longer useful (such as outdated pesticides or chemicals a superintendent doesn't like) they become a waste and are regulated

Anhydrous ammonia not poisonous

The Department of Transportation has announced that it will not classify anhydrous ammonia as a poisonous gas, as it had originally proposed nearly two years ago.

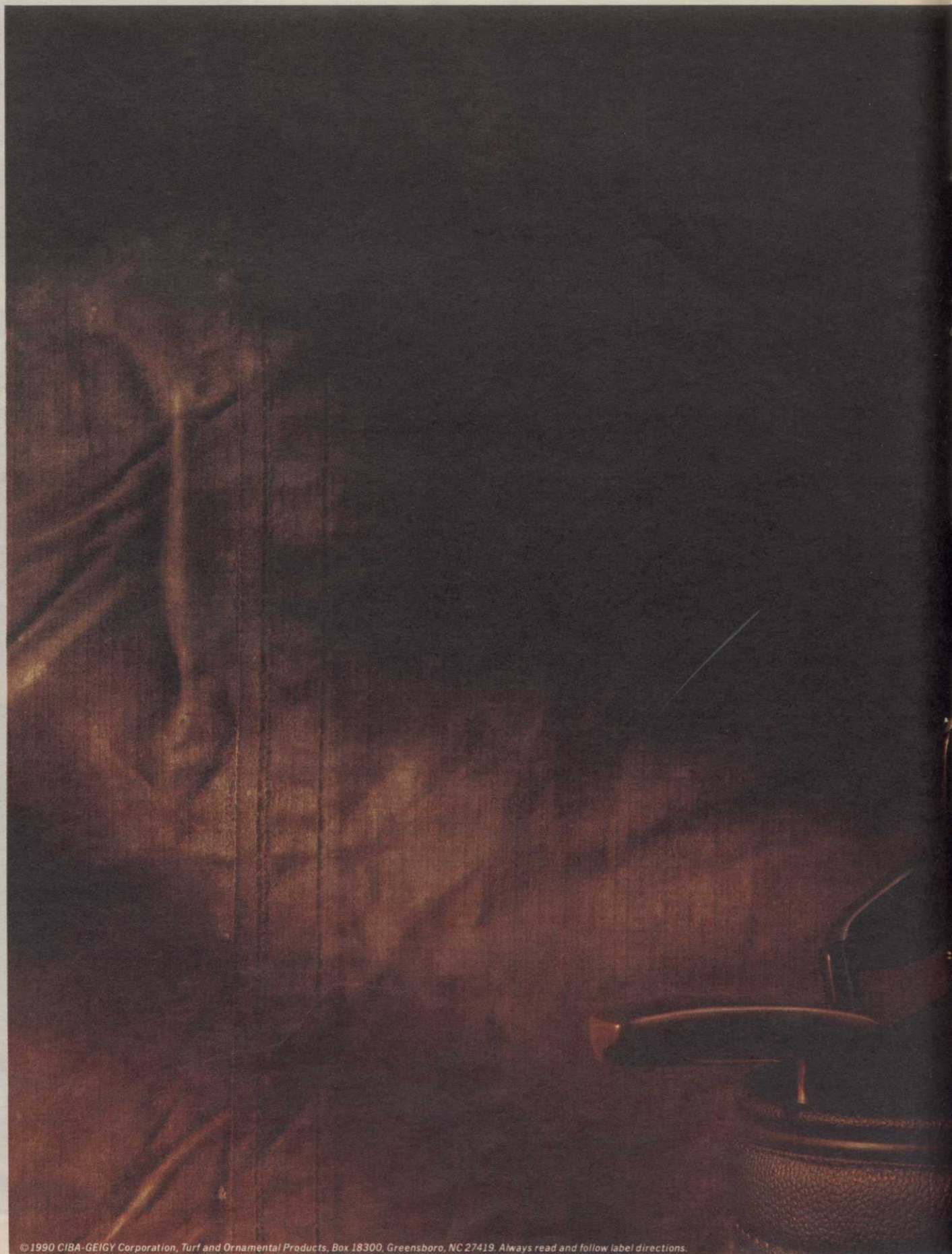
DOT's plan to alter the classification of this key agricultural nitrogen source had been opposed by farm groups and congressional leaders serving on the House and Senate Agriculture committees.

The agency said ammonia will retain its current "nonflammable gas" designation, but it also announced a proposed rule that all ammonia transport tanks must bare the words "inhalation hazard" to underscore the need for special handling precautions necessary to ensure safe transport.

Anhydrous ammonia is a popular source of nitrogen fertilizer containing the highest nutrient value of any commercial nitrogen. For decades, its use, handling and transport have been based on recommended safety practices, the Fertilizer Institute said.

DOT's earlier plan to impose the highly provocative poison label would have meant higher shipping and insurance costs, inclusion of the skull-and-crossbones symbol for this essential plant food, and elevated costs for growers.

Although ammonia has long been termed a nonflammable gas and an inhalation hazard, transport vessels have not carried the inhalation precaution. The proposed rule adds this labeling requirement to the existing standard.



© 1990 CIBA-GEIGY Corporation, Turf and Ornamental Products, Box 18300, Greensboro, NC 27419. Always read and follow label directions.

For retail sale to and use only by certified applicators or persons under their direct supervision, and only for those uses covered by the applicator certification. Triumph is approved under FIFRA

dangerous to financial health

under the Environmental Protection Agency's 40 CFR rules governing waste products.

"Pesticides, fertilizers, fungicides, herbicides, insecticides — you have all of these and I suspect you recognize these as things you should worry about," Malotke said. "But you also have to be concerned about your maintenance chemicals — the degreasers, the gas, the oil, the blade-honing compounds ... as well as underground tanks.

"You use a lot of different types of chemicals to maintain your equipment. Improperly managed, those can cause you significant

and costly problems."

Malotke cited a local cemetery her company inspected where Tencon found 750 chemicals on the premises. In another inspection some 200 chemicals were in use at a lawn-care company.

Malotke said each handler of chemicals has certain responsibilities under the OSHA law.

The chemical manufacturer or supplier determines which products are hazardous, then must provide for safe packaging and shipping, clearly label the chemicals and provide an accurate material safety data sheet (MSDS), she

said.

The superintendent, as part of his hazardous communication and safety program, must make a list of all chemicals and hazardous materials and where they are ("If you wouldn't put it in your mouth, it goes on the list."); label all containers, including safety cans and tanks; train his employees; create a safe work environment with appropriate safety equipment; and provide MSDS to OSHA, DEP and DOT.

And, she warned: "This is not a do-it-once-and-forget-it job. It's your problem to stay on top of it,

always."

In case of a chemical spill, should you contact the government?

"Yes, the law says you have to call. If you don't, some disgruntled employee may call, and then you're really in trouble," Malotke said.

She said if a superintendent acts responsibly — first, implementing and keeping a hazardous materials program; and, second, contacting authorities when a problem arises — those enforcing the laws usually respond much more leniently in imposing penalties.

"It's the only way to go," she said.

Advice from a pro

Tencon, Inc. President Mary Malotke's talk at the Ohio Turfgrass Conference and Show included some sage advice to golf course superintendents and others in the lawn-care industry.

- "Many in your business buy concentrated chemicals and mix them up," she said. Superintendents should ask producers for labels, put those labels on containers when the chemical is out and in use.

- "Gasoline is a very common and dangerous chemical if you don't use it safely," she said. She said one death a year in Ohio is caused by a gasoline explosion. Gas fumes stay near the ground and can ignite easily, she said.

- Irritants and corrosives must be handled with care, she said, recommending protective clothing. Battery acid can be a problem, especially since batteries can no longer legally be thrown out without precautions. Malotke said 20 batteries explode — from wrongly jump-starting, overloading, or other reasons — every winter in Ohio.

- "Know the symptoms of the chemicals you use," she said.

- Most forms of toxics are invisible.

- Chemicals can't always be detected by sight or smell.

MANAGING

A GOLF

COURSE, LIKE

PLAYING

ONE, IS MORE

A TEST OF

JUDGEMENT

THAN POWER.

If Triumph® were a golf club, it would be graphite.

It is that advanced. It is that powerful.

In fact, no other turf insecticide achieves faster, longer lasting control of problem pests.

But along with this power comes the tremendous responsibility to always use it properly.

After all, the beauty of your golf course isn't the only thing we are working hard to preserve.



For free information circle #121

Ex-astronaut Irwin to speak at GCSAA show

Apollo 15 astronaut Col. James B. Irwin, one of 12 people to walk on the moon, will speak at the Prayer Breakfast during the Golf Course Superintendents Association of America's 61st International Golf Course Conference and Show in Orlando, Fla.

Irwin, who participated in the fourth manned lunar landing, will speak from 7:30 to 9 a.m. Sunday, Feb. 25, at the Orlando Peabody Hotel. The breakfast is open to all faiths.

John Ebel of Barrington Hills (Ill.) Country Club, who heads the breakfast organizers, said, "There should be a lot of families with kids in Orlando," Ebel said. "This will be a great experience for the parents and children."

After retiring from the Air Force in 1972, Irwin founded High Flight Foundation to "inspire and motivate individuals to attain their 'highest flight' in life."

He has written three motivational books, spoken in 55 countries, including the Soviet Union.

About his lunar landing, Irwin said: "The hours that I spent on the moon were the most thrilling of my life. Not because I was there but because I could feel the presence of God. There were times when I was faced with new challenges, and help from God was immediate."