

MEET "SARA"

EDITOR'S NOTE: Winter months offer the best time for golf course superintendents to get a handle on what is becoming an avalanche of regulations and legislation affecting the way we do business.

One of those pieces of legislation is the Superfund Amendments and Reauthorization Act — SARA. The following summary was drawn together by Russ Weisensel, primarily from a paper by Roger Flashinski of the University of Wisconsin Extension Service in August of 1988. If you would like a copy of Mr. Flashinski's paper or more information about SARA, Russ has offered to make both available. Contact him at the Wisconsin Agri-Business office.

Facility Requirements Under SARA and Wisconsin Law

The Superfund Amendments and Reauthorization Act (SARA) and the 1987-88 Wisconsin Act 342 set forth requirements for planning and reporting relating to hazardous and toxic chemicals. The laws are aimed at having every community ready to handle an accident.

SARA has four major sections: emergency planning, emergency notification, community right-to-know, and spill reporting.

Emergency Planning

EPA has prepared a list of 366 Extremely Hazardous Substances. (Pesticide EHS list is found after this article.) Any facility (including farms, dealers, and warehouses) that produces, uses, or stores any of these substances in an amount greater than their TPQ (Threshold Planning Quantity) [this number relates to the amount of *active ingredient* in inventory] must notify the Wisconsin Division of Emergency Government and the Local Emergency Planning Committee (LEPC) that the facility is subject to the planning requirements of the act. Notification shall be in writing and specify the name and location of the facility. Seasonal inventories are not exempt from this requirement. A complete list of hazardous substances can be secured from the Wisconsin Division of Emergency Government.

The facility must also provide their LEPC with other information necessary to develop and implement an emergency response plan.

This reporting was to have been completed by May 17, 1987. However, most people were not aware of this re-

quirement and penalties for late reporting haven't been strictly enforced.

The written notification of your inventories in excess of the TPQ must be sent to the State Emergency Response Commission, Wisconsin Division of Emergency Government, 4802 Sheboygan Avenue, Madison, WI 53705. Notice must also be made to your LEPC.

Wisconsin Act 342 requires a one-time emergency plan notification fee of \$800.00 for facilities that have the equivalent of 10 or more full-time employees.

Emergency Notification

In addition to TPQ amounts, SARA also has established reportable quantities for spills of each listed extremely hazardous substance. Under SARA farmers and ag chemical dealers are

subject to this report only if the release of the extremely hazardous substance is in excess of its reportable quantity *and* if the spill has potential off-site exposure.

Wisconsin Act 342 however, requires notification of all spills for hazardous substances regardless where it occurred. Wisconsin law applies to all facilities including farms. With spills involving pesticides, Wisconsin requires reporting of undiluted pesticides of one quart or more, and diluted mixture spills of five gallons or more. This report must be made to your LEPC, the State Emergency Response Commission and the DNR.

Community Right-to-Know

This law has been expanded to include all non-manufacturing facilities, including agriculture. By September

Pesticides Included in EPA's List of Extremely Hazardous Substances

Chemical Name	Trade Name	Threshold Planning Quantity (Sec 302)	Reportable Quantity (Sec 304)	MSDS & Tier II Reporting Quantity (Sec 311 & 312)
	 lbs. active ingredient		
acrolein		500	1	500
aldicarb	Temik	100*	1	100
aldrin		500*	1	500
allyl alcohol		1000	100	500
aluminum phosphide	Phostoxin	500	100	500
ammonia (anhydrous)	(fertilizer)	500	100	500
antu		500*	100	500
arsenic pentoxide		100*	5000	100
azinphos-ethyl	Ethyl Guthion	100*	1	100
azinphos-methyl	Guthion	10*	1	10
bromadiolone	Maki, Bromone	100*	1	100
carbofuran	Furadan	10*	10	10
chlordane		1000	1	500
chlorfenvinfos	Supona	500	1	500
chlorophacinone	Rozol	100*	1	100
chloroxuron	Tenoran	500*	1	500
chlorthiophos		500	1	500
coumaphos	Co-Ral	100*	10	100
demeton	Systox	500	1	500
dichlorvos	vapona (many)	1000	10	500
dicrotophos	Bidrin	100	1	100
dimetox		500	1	500
dimethoate	Cygon, De-Fend	500*	10	500
dinitrocresol	DNOC	10*	10	10
dinoseb	Premerge, Dyanap	100*	1000	100
diphacinone	Ramik, Diphacin	10*	1	10
disulfoton	Di-Syston	500	1	500
endosulfan	Thiodan	10*	1	10
endothion		500*	1	500
endrin		500*	1	500
EPN		100*	1	100
ethion		1000	10	500
ethoprophos	Mocap	1000	1	500
fenamiphos	Nemacur	10*	1	10
fenitrothion		500	1	500
fensulfothion	Dasanit	500	1	500
fluoroacetamide (1081)		100*	100	100
fonofos	Dyfonate	500	1	500
formetanate hydrochloride		500*	1	500
formothion		100	1	100
leptophos	Phosvel	500*	1	500
lindane		1000*	1	500
mephosfolan	Cyrolane	500	1	500
methamidophos	Monitor	100*	1	100
methidathion	Supracide	500*	1	500

24, 1988 all facilities were to submit copies of the MSDS for each hazardous chemical or a list of such chemicals to the State Emergency Response Commission, the LEPC, and the local fire department. Family farms, or incorporated farms with fewer than 10 full-time employees are exempt.

There is a difference between the term "extremely hazardous substance" in SARA and the term "hazardous chemical" used by OSHA for worker right-to-know. The EPA has listed 366 EHS and established a TPQ and reportable quantity for each. Hazardous chemicals are based on categories of health and physical hazards and include some 50,000 products. These of course include all the substances on EPA's list. An MSDS should be developed for all hazardous substances.

Filing must take place for each extremely hazardous substance if the inventory amount at any one time is equal or greater to the TPQ or 500 pounds, whichever is lower (see table). An MSDS for each hazardous chemical not on EPA's list must be filed if the inventory exceeds 10,000 pounds or more at any one time. This 10,000 pound threshold was subject to change on October 17, 1989. Draft rules will be published on or about January 1, 1989 which may greatly reduce this threshold.

The Wisconsin Act also requires an inventory form fee to be paid annually based on the number of chemicals reported. For one to 100 hazardous

Chemical Name	Trade Name	Threshold Planning Quantity (Sec 302)	Reportable Quantity (Sec 304)	MSDS & Tier II Reporting Quantity (Sec 311 & 312)
..... lbs. active ingredient				
methiocarb	Mesuroil	500*	10	500
methomyl	Lannate, Nudrin	500*	100	500
methyl bromide	Meth-O-Gas	1000	1000	500
methyl isothiocyanate		500	1	500
mevinphos	Phosdrin	500	10	500
mexacarbate	Zectran	500*	1000	500
monocrotophos	Azodrin	10*	1	10
nicotine		100	100	100
norbormide		100*	1	100
oxamyl	Vydate	100*	1	100
paraquat	Gramoxone Super	10	1	10
parathion-ethyl		100	1	100
parathion-methyl		100*	100	100
phenylmercury acetate		500*	100	500
phorate	Thimet	10	10	10
phosfolan	Cyolane	100*	1	100
phosmet	Imidan	10*	1	10
phosphamidon	Dimecron	100	1	100
pirimifos-ethyl		1000	1	500
promecarb		500*	1	500
sodium arsenate		1000*	1000	500
sodium arsenite		500*	1000	500
sodium fluoroacetate (1080)		10*	10	10
strychnine		100*	10	100
sulfotep	Bladafume	500	100	500
TEPP		100	10	100
terbufos	Counter	100	1	100
thallium sulfate		100*	100	100
thiofanox		100*	100	100
triazofos		500	1	500
warfarin		500*	100	500
zinc phosphide		500	100	500

Where the TPQ is followed by an asterisk (*), granular formulations of that active ingredient may be produced, used, or stored in quantities up to 10,000 pounds of active ingredient before the facility is subject to the emergency planning requirements of this act. Values without an asterisk relate to all formulations (including granules) containing that active ingredient.

chemicals the fee is \$100; for 100 to 500 chemicals, \$150; and for over 500 pounds of hazardous chemicals, \$300.

Facilities including farms with the equivalent of less than 10 full-time employees are exempt from this payment.

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Start the New Year Right — Send a Pledge to the NOER CENTER

The list of donors who have already given money and pledged more over this year and next year is slowly growing. It now approaches a total of 50. The sad thing is that the list includes so few WGCSA members and/or their golf courses and golf clubs.

That list of donors is noted above and includes everyone whose gift and pledge had been received by December 16. Deep and sincere thanks go to them. For members who haven't dedicated anything to the NOER CENTER, please make 1989 your year to do so. There is still a lot of money to be raised.