

Is a Clean Sweep Program for WGCSA Possible?

By Mark Kienert
Bull's Eye Country Club

"Portage County Clean Sweep Program Sold Out in One Half an Hour!". That was the information passed along to me by Elaine Andrews, University of Wisconsin Environmental Education Specialist in Madison. She helped coordinate that clean sweep program. A special grant of \$30,000 was used up in that first one half an hour. Portage County Board Supervisors chipped in an additional \$100,000 and those funds were used up before noon!

Was this program a success or was it an extreme failure? It all depends on how you look at it, I guess. From my standpoint, it could be viewed as a failure if a farmer spent half his day loading up his truck with all his unwanted products and made the long drive only to find out that the gates were locked as he drove up to the clean sweep disposal center site.

"Now what?", he asks. I can just imagine some frustrated and angry individual pulling over to some out of the way area and dumping those waste products into some secluded ravine! He figures he won't go through that hassle again.

Would a clean sweep program work for our association? In short, yes, if we could find and hire a contractor to coordinate and compile a list of all the products that we have no use for any longer and arrange for a *licensed waste hauler* to make what is called a "Milk Run"—to come to our courses to pick up those wastes. This person would be responsible for the proper sampling required for identification, labeling, packaging, transportation and finally, the disposal of all unwanted products.

Those products could be either liquid or solid. Our costs would have to be prorated to be fair to the golf courses using this service. Believe me, those services are not inexpensive or fast.

At present, our association would not qualify under any existing grant-in-aid programs offered by the federal or state agencies in charge of hazardous waste disposal to help subsidize our costs. Even as a non-profit organization, to qualify for an exemption would be a long shot at best.

To calculate some of those costs, a general rule of thumb of \$6/pound of product disposed was used. You can

see that two fifty pound bags of old insecticide that you wish to dispose of would cost your club \$600 for proper disposal.

One hundred country clubs in our association disposing of two fifty pound bags of old insecticide each would cost \$60,000 for disposal. Sure, individual clubs would be charged for their fair share of the disposal costs, but as you will see, this effort requires licensed individuals to package and to transport these materials to hazardous waste disposal sites.

A tremendous amount of organization, documentation of materials, coordination of pickups and lots of time would be necessary to pull off a statewide disposal effort. Legal questions abound as any individual who disposes hazardous wastes is responsible for those wastes. . . "ad infinitum." You, or your club, or our association would be responsible for our share of any future clean up costs should the landfill fail some years down the road.

In the case of the Wisconsin Golf Course Superintendents Association, we could simply decide to declare bankruptcy to skirt any lawsuits on future cleanup damage claims. Quick. Easy. Cute. But would that be ethical? Of course not. But that's the way it is in this day and age of litigation.

There is always the ever present potential that existing board members, or previous board members responsible for those initial decisions could be subject to lawsuits to recover the costs associated with the clean up.

As you will see, the disposal of waste, be it hazardous or not, is not an easy proposition. You've already been bombarded with environmental "red flags" and legislation for a half dozen years or so. It always amazes me that the 90's will be known as the environmental decade, when so many of the seeds for change were sown in the 80's. But there is no stopping it; these are the 90's and it's time to clean up.

That will be the hardest part—the decision to just clean up. To rid the "Old Barn" of pesticides and fertilizers that are no longer effective. Your service center, as you've come to realize, (if you've secured all the MSDS required), produces waste in the form of old lead acid batteries, automotive

paints, solvents and used motor oils.

What can you do about this? Individual clubs can contract their cleanup needs with a private company. There are many approved by the State to conduct this service. I was able to obtain a list just by calling my local DNR office. This list produced contacts with other departments which provided me with information that was very helpful in answering many of my questions.

As was mentioned previously, these services will not come cheaply, nor will they be able to deliver on next day service. Most clean up services will take between two to three months in time from your first call to the point your waste is on its way to the disposal site.

Why does it take so long? RED TAPE! Individual wastes must be identified through laboratory analysis and then manifested for legal transportation and proper disposal. While you are waiting for the chemical analysis of products that you wish to dispose of, the paper work for an EPA Identification number that will be assigned to your club must be applied for. Without this number, there will be no waste packaging or disposal.

This adds to the time needed to dispose of any waste material. What a private firm does with your waste from the time they arrive at your club until the time your products are disposed of makes up what is termed the second half of the Waste Stream. The first half is your decision to purchase and to use any products.

Your wastes become hazardous when they fall under the following EPA guidelines. By definition, the EPA defines a hazardous substance as a "Dangerous" substance which may harm human health or the environment. To be included in the EPA's hazardous category, the substance must meet certain standards during accepted scientific tests which would show whether or not a product is Toxic, Ignitable, Corrosive or Reactive.

Most products become hazardous if they are used, stored or disposed of improperly. Serious environmental damage can occur anytime these products are handled in a manner that is negligent.

For proper disposal, you must understand the waste stream disposal

process. Mark Heal, Account Representative for Chemical Waste Management, explained the process his company would use if they were selected to dispose of wastes generated over time on your golf course. Their first step would be to inventory and identify all products you wish to dispose of. All unknown chemicals would be analyzed and coded for their respective degree of hazard (corrosive, reactive, inflammable or toxic).

It is at this time the request for an EPA facility identification number is applied for. Once the paperwork process is complete, a two person team of certified technicians would come into your facility to segregate and package your materials.

These members are licensed by the Department of Transportation to haul hazardous wastes to an approved disposal center. This also is another reason it would be difficult for our association to organize a clean sweep program using 5 or 6 collection points around the State to dispose of our waste products. The simple fact is that we just are not licensed by the D.O.T. to haul these products on public highways. (If we decided to give the products to some other golf course to use, and they could use those products on their course (we could transport those products to their facility legally).

Individual products are packaged in a container called a "Labpak". They are then labeled clearly and sent to a final disposal site if they are solids, or are destroyed at a facility in Illinois where they are burned in an incinerator at 1700° F. and rendered inert. The State of Illinois also requires the registration of any waste that is transported within their state. The remaining ash is then disposed of in a landfill.

It is an understatement, but the more manpower hours required in the testing of unknown chemicals, the higher the disposal costs. You can save money if you are able to identify those products beforehand with labels and MSDS sheets. Leave the unknowns to the experts. Virgin materials do not require the expensive chemical analysis if they were manufactured after 1982 and have clear labels and MSDS sheets.

Once your facility is clean, it will be easier to keep it that way as you begin to manage your wastes better. You could also arrange for a periodic pick up of waste products as they are generated to reduce your risks of having to store hazardous products in large quantities over an extended period of time. Secondary pickup of waste products would be less costly as your facility would have already gone through the registration process for known materials to be disposed of. The resampling process would be avoided.

The principal advantage of having contracted out your disposal concerns is that you are insuring a safe and proper disposal which substantially reduces the risk of exposure to these chemicals by your crews, the general public and the environment.

Minimizing Future Risks

Major changes in federal and state environmental regulations make it difficult to keep up with all that's required in the disposal of wastes produced by our golf courses. Proper management of hazardous wastes is complex and time consuming. Yet, a single error in management of these wastes can result in severe penalties of up to \$50,000 per day.

Compliance with all the regulations to manage your waste products safely will require a great deal of your time. Legal interpretations and questions still remain. As always, an effective way to manage your hazardous waste disposal costs and liability is to reduce the amount of waste produced.

Some suggestions in reducing potential risks and liabilities include, but obviously are not limited to any of the following. DO NOT DUMP, BURN, or BURY pesticide wastes. DO NOT MIX CHEMICAL wastes. Remember, "dilution is not the solution" to hazardous waste problems. Ten gallons of hazardous waste diluted with 90 gallons of clean water yields 100 gallons of hazardous waste! Your disposal costs and problems have just increased ten-fold.

Purchase only what you can use in one season. "Bulk purchases are not always the best". Money saved through quantity discounts are quickly lost if you have to dispose of unwanted products, especially if fines are involved. Try to "Sell Back" to the distributor or original manufacturer any product that can not be used in an effort to keep the product from becoming old.

Some products can be reformulated for reuse. Apply leftover products at label rates to out of the way areas on the golf course. Areas like roughs and practice ranges are areas where pesticides can be disposed of properly.

Purchase an inexpensive "Jet-spray" device that can be attached to a hose. When used, by piercing the bottom of pesticide containers, a simple 60 second blast is as effective as triple rinsing. This will insure that landfills will continue to accept pesticide containers well into the future.

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You may wish to give your unwanted product to someone who could use it. Some smaller golf courses could benefit from "Old" fertilizer that requires breaking up due to the fact that it has become "hard as a brick". Look for products that are less toxic but are as effective as those used previously. Dispose of old paint products by using them up. Some landfills cannot or will not accept paint cans half full of unused paint, yet will accept a piece of plywood, once cut up of course, if it has been painted with this same paint!

Some municipal or county courses may qualify for special aid awarded to communities that have organized clean sweep programs. Other courses might wish to organize with neighboring courses into small cells that can be easily serviced by hazardous waste contractors. The costs of transportation can be shared among several courses.

Use companies that will recycle the waste produced in your service centers.

There are companies that sell parts cleaning solvents and wash stations. Those stations are serviced on a routine schedule with the company responsible for the hauling away the spent product. They will distill and reuse the solvents over again. This reduces your liability substantially.

Staying on top of all the regulations is laborious and time consuming. In putting together this article, it became very apparent to me the enormous amounts of information available to superintendents wishing to clear out "that corner of the shop". Read, stay on top of the current laws as there is a battery of deadlines constantly showing up on the horizon as landfills fall prey to stiffer regulations.

Your most important step will be your

first one, that is to just get started. Take note of the products you wish to dispose of and determine if you will require professional help. Budget for disposal costs in next year's budget. If you need help, contact the DNR, UW-Extension or your local emergency government coordinators for information. They will be able to supply you with lists of companies that dispose of hazardous waste and help you with other problems you might have.

The rules may seem complicated. The ink hasn't even dried on a few of them yet. But it is imperative that you develop and implement a strategy to comply with them. "Out of sight, out of mind" is just plain ignorance today. Get those products out of your service centers today.

A recent GRASSROOTS survey told me you could use the extra storage space anyway.

GCSAA Regional Seminar Gets Good Marks

By Tom Schwab

Just being a certified pesticide applicator was not enough for the 45 or so superintendents and assistants in attendance at the GCSAA/WGCSA Pesticide Basics & Safety seminar. They took the time to learn even more about the safe handling of these materials. The seminar was held on March 21 at the Holiday Inn in Brookfield, and was conducted by Dr. Bert Bohmont, professor and coordinator of pesticide programs for the College of Agriculture Sciences at Colorado State University.

A broad range of material was covered throughout the day, everything from laws to better spraying equipment to dealing with the media. The day started out with a discussion about 15 laws that govern pesticide applicators. Time was spent covering OSHA's "Hazard Communication Standard", Employee right-to-know. For a great description of "HCS" see Larry Lennert's article in the March/April issue of *The Grass Roots*.

Dr. Bohmont's talk revealed manufacturers are responding to the need to apply chemicals more safely. This is being done in several ways, such as reducing drift either mechanically or chemically, controlling rates better by computerized calibration, more pest specific pesticides that can be less toxic, better pest predicting models and methods, and safer packaging.

Other material that was covered in Dr. Bohmont's talk was understanding

pesticide labels, protective clothing and equipment, environmental concerns, decontamination and disposal.

Some of this material was an extension of what superintendents learned when getting certified for pesticide application. A lot more was new information. Whether it was repetition or new,

it was all good information that we could use. In this industry, superintendents have to stay on top of this information since we handle many pesticides and are responsible for a much larger piece of the environment than the average person.

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