

Start Your Own Environmental Compliance Checklist (Part 1)

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General Counsel

The tasks and complexities required for today's regulatory compliance may seem overwhelming to a golf course superintendent. There are no fast or easy ways to accomplish complete compliance. But developing a self-help checklist can help you sort out your responsibilities as a professional golf course manager.

The following suggestions and questions could serve as one part of the regulatory assessment that you conduct at your golf course facility on a periodic basis.

Pesticides

Do you have a current copy of state FIFRA regulations? FIFRA is a federal law, but because it is enforced by the states, each state is significantly different. If you don't have copy of the most recent state pesticide regulations, please contact your state pesticide control official. Many states are adding significant changes to pesticide regulations. It is important to update yourself on a regular basis.

Do you have a complete inventory of chemical products with the amounts on hand listed? The Hazard Communication Standard requires you to list all hazardous chemicals, including

pesticides.

It is also important to keep track of amounts of unused pesticides on hand. Part of any superintendent's job is to keep the amount of chemical wastes or unused pesticides to a minimum. If you have pesticides that will not be used, you should make immediate plans to properly dispose of them. Most states have hazardous waste filing requirements for facilities that store as little as 25kg (about 55 pounds) of waste products. To avoid complicated paperwork and associated costs you should keep your waste storage as close to zero as possible.

Even though your facility may not need to comply with community right-to-know regulations, your local fire marshal may ask you to file a list of chemicals with their department. They generally prefer lists with estimated quantities vs. material safety data sheets (MSDSs). Some, however, may require MSDS submission.

It is also a good idea to list regularly used chemicals that have re-entry requirements. This list will continuously remind applicators of such products to abide by these re-entry restrictions.

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Environmental Checklist—

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Pesticide Mixing/Loading Area

Do you monitor the soil in the area used for mixing and loading the pesticides? It may be advisable to conduct soil testing for pesticide and nitrate residues in the mixing area. EPA will most likely start testing these areas at golf courses and in similar agricultural settings in the near future. In addition, mixing/loading pads will probably be required for golf course operations by 1994.

Superintendents should start gathering information now and figuring the costs of such pads into future budgets. Some states, such as Iowa, already have mixing/loading pad requirements in effect.

Water Protection

Do you regularly test your ponds for pesticide and nitrate contamination? Some states now require the testing of golf course ponds. Testing is one way to reassure concerned citizens that your golf course is not polluting water sources. (Some ponds drain into streams that eventually leave the golf course.)

It is extremely important to protect streams or water bodies that eventually flow into potable water sources. In Texas, for instance, there are hefty fines for those who pollute tributaries of water bodies used for drinking water supplies.

Do you have emergency procedures in place to protect water sources in case you have a pesticide spill? Workers should be trained on how to contain chemical spills, and a supply of absorbent packets should be on hand.

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