



Recording hazardous waste water

IF YOU HAVE NOT ALREADY REVIEWED your operation for compliance, get started on the process with the following general checklist. Also, individual states and localities may have even more stringent standards, so check with your state and local authorities to make sure that you are in compliance with their rules (see page 9 under "Regulatory Watch"). ■

If you check any of the following items, you probably have a compliance problem.

HAZARDOUS WASTE WATER CHECKLIST

PROBLEM MATERIALS

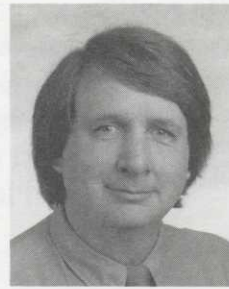
- Canceled pesticides
- Unused, left-over tank mixes that will not be recycled
- Materials considered to be carcinogenic
- Spill clean-up residues in quantities exceeding 220 lbs. or 1/2 of a 55 gal. drum
- Unusable mixture spills in containment areas from mixing or loading operations
- Left-over mixes from pesticides designated as hazardous
- Pesticides or pesticide mixtures placed in unmarked containers

PROBLEM CONTAINERS

- Unrinsed pesticide containers
- Pesticide containers that have been rinsed less than three times
- Triple rinsed containers that have not been drained for 30 seconds
- Empty paper pesticide containers that have plastic liners and have not been triple rinsed

PROBLEM PRACTICES

- Dumping tank rinse water onto ground or into drains
- Storing left-over tank rinse water that is not to be recycled
- Storing left-over mixes of materials designated as hazardous and non-hazardous
- Burning rinsed pesticide containers contrary to labeled instructions
- Storing old or out of date pesticides
- Having any leaking pesticide containers
- Washing the outside of pesticide application equipment on the application site within 300 yards of a well, creek, pond, lake, drainage ditch, or storm drain.



**Posting:
It's a matter of
courtesy**

by Christopher Sann

POSTING INVOLVES PLACING two or three small warning signs around a site after applying a pesticide. Sounds fairly simple, but some people's perceptions of it are clouded by the complexities of the environmental awakening and the whole series of related controversies that have occurred over the last 10 to 20 years.

Posting is a required procedure around agricultural fields, orchards and nursery growing areas, where it is primarily aimed at protecting workers. Posting tells the workers what material has been applied and how long they should wait before re-entering a treated site.

Is posting a big imposition on our industry? Not in terms of costs. From a labor stand point it might take one worker an average of three minutes per location to get the signs from the truck and place them around a site. The cost of the labor to place the signs should be about 49¢, assuming a wage rate of \$7.50 per hour with a benefit package that costs 30%. The signs, if bought in quantity, should cost about 5¢ apiece—with a cost of 10¢ per site, if an average of two signs are used per site. Thus, the cost of the labor and the signs amounts to about 59¢ per site.

Does posting somehow represent a singling out of our industry? Not at all. The standards for notifying workers and the general public about potential hazards are going up for every industry and every line of business. Despite the inevitable discomforts and disagreements involved in any major change, we are all better off for it in terms of costs, safety, good labor relations, and good public relations.

Getting to where we are today has not been easy, but we have come a long way. Companies that used to tell everyone outside of senior management to mind their own business now have extensive safety and community outreach programs. They tout their safety records and their environmental "due diligence" in their advertising. These issues have gone from skeletons in the closet to selling points. There is still a fair amount of foot-dragging, but many people have realized that there are advantages to getting ahead of the power curve on this issue.

An idea whose time has come

In fact, quite a few people support the idea of posting:

- ENVIRONMENTALISTS