



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

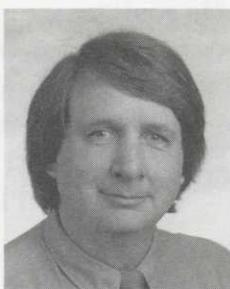
- Canceled pesticides
- Unused, left-over tank mixes that will not be recycled
- Materials considered to be carcinogenic
- Spill clean-up residues in quantities exceeding 220 lbs. or 1/2 of a 55 gal. drum
- Unusable mixture spills in containment areas from mixing or loading operations
- Left-over mixes 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- Storing old or out of date pesticides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



From the proverbial 'wet paint' signs of painters and the 'wet floor' signs used by janitors to the 'please excuse our progress' signs used by highway departments, this kind of courtesy is just plain good business.

- FEDERAL, STATE AND LOCAL government regulators
- MANY TURFGRASS MANAGERS
- MANY HOME OWNERS
- AVERAGE CITIZENS, ALL SIZES, SHAPES

PLCAA (the Professional Lawn Care Association of America) supports the idea. At a recent congressional subcommittee hearing to re-authorize FIFRA, PLCAA recommended requiring all lawncare operators to post sites on which they apply pesticides.

Posting will help notify people to take care when entering the area where a pesticide application has been made. It will notify post office workers, service personnel, delivery people, people walking their dogs, home owners coming home from work, housewives coming home from running errands, latch key kids coming home after school—anyone who might walk onto a treated area. These are all excellent reasons for requiring the posting of pesticide treated turf areas. Taken in toto they provide a overwhelming reason for the adoption of posting requirements on the federal level.

All that having been said—there is one more reason that outweighs all of the above. Put the issue on a personal level. If I am going to apply a pesticide to a turf site, posting the site is a matter of courtesy. From the proverbial "wet paint" signs of painters and the "wet floor" signs used by janitors to the "please excuse our progress" signs used by highway departments, this kind of courtesy is just plain good business.

A modest proposal

IN FACT, I THINK TURF MANAGERS should take this concept of "just plain good business" one step further. I propose that all turfgrass managers voluntarily agree to make a major effort to see that all non-target applications of any material applied to turf sites be removed from any surface where it might become a source of non-point pollution. Put more simply, we should remove any applied materials that have landed on roads, sidewalks, driveways and any location where water may move the materials into ponds, creeks, rivers, bays or any body of water.

From a practical standpoint, granular applications should be swept or blown from these surfaces. Liquid applications require that the applicator be careful to avoid spraying non-target areas.

As practicing turfgrass ecologists—or at least as professionals who read the handwriting on the wall, we should make sure that our activities are not the source of any potential pollution. It is not only the correct thing to do, but

Fed issued "final" rules on training for workers who transport hazardous materials

THE U.S. DEPT OF TRANSPORTATION has issued final rules governing the minimum training requirements for workers who transport hazardous materials. Every two years employees, who handle or transport such materials must receive training aimed at increasing their general awareness as well as specific job and safety training.

Industry group issues new standardized MSDS format

THE CHEMICAL MANUFACTURERS ASSOCIATION reports that it has established new voluntary standards for the format for Material Safety Data Sheets (MSDS). The new format simplifies the reporting of MSDS information and makes it more consistent.

Product labels are no substitute for MSDS's in California

AS OF THIS PAST JANUARY, California began requiring that manufacturers, distributors, and dealers provide MSDS's directly to pesticide purchasers. Unlike many other states, California had exempted this requirement and allowed the pesticide label as a substitute for MSDS's.

Ohio puts labeling of possible carcinogens on the ballot

THE OHIO SUPREME COURT has let stand a carcinogen labeling proposition set to appear on the ballot in November. If approved by Ohio voters, the proposition will require extensive labeling of products that are possible carcinogens or that pose reproductive threats. In addition, chemical companies, farmers and others will have to issue warnings to area residents of possible risks.

Hazardous waste water generator

MANY COMPANIES ARE STILL IN THE PROCESS of determining how the hazardous waste regulations of the Resource Conservation and Recovery Act (RCRA) apply to their operation. Here are two sources of additional information:

- "Understanding the Small Quantity Generator Hazardous Waste Rules: A Handbook for Small Business". Call the EPA's RCRA/Superfund Hotline at **1-800-424-9346**.
- Information packets are also available from several companies that specialize in helping small companies with regulatory compliance, including

Compliance Corp. of America Inc.
The Woodland Bldg.
4243 Dunwoody Club Drive, Suite 103
Dunwoody, GA 30350-5611. ■

any pollution that might develop from the failure to remove these non-target applications could prove to be disastrous to an industry that is struggling to prove to society in general that we are competent professionals and deserving of society's trust. ■