

# EPA's plan standardizes posting

## Agency recommends posting for LCOs, parks, golf courses and homeowners; doesn't rule out federal posting law.

■ You have until Oct. 31 to write to the U.S. Environmental Protection Agency (EPA) and comment on its plan seeking standardized posting requirements for pesticide applications.

That was the date set in an EPA position paper that "strongly recommends" that pesticide posting programs be the same wherever they're instituted. The EPA's effort is aimed at the 19 states and the few local governments with posting. It also provides guidance for those jurisdictions considering posting.

The EPA's document is finding mixed reviews in industry. The biggest stumbling block: homeowner posting. EPA's recommendation suggests that homeowners post too. So far, only Connecticut and Prince George's County, Md., require homeowner posting.

Allen James of Responsible Industry for a Sound Environment (RISE) believes the

For golf courses:

CATEGORY C

**PESTICIDES ARE PERIODICALLY APPLIED TO THIS GOLF COURSE**

EPA "has overstepped" its purpose. "As far as we can tell, states have not asked the EPA for this type of guidance," he says.

"Rise will respond. There is no question about that," he says. The organization is contacting member companies for their views. Much of the RISE membership is chemical manufacturers and formulators.

But lawn care companies, long subject to posting, feel that standardization of posting is probably a good thing.

"Most importantly, standardization will facilitate education, especially of children, concerning the meaning of the signs and appropriate behavior to avoid exposure," says the EPA document.

Norm Goldenberg says his company, TruGreen/ChemLawn, favors standardizing warning sign and, in general, favors posting. "For the most part, the lawn care industry already posts," he points out.

For public parks, school grounds, recreational fields, cemeteries:

CATEGORY B

**CAUTION, PESTICIDE APPLICATION. KEEP OFF**

(LAWN TREATMENT DATE)



"I think it's terrific," adds John Buechner, director of technical services, Lawn Doctor Inc., Marlboro, N.J. "It's the fruition of years of work by a lot of lawn care people to get the EPA to recognize our concern over homeowner application."

Tom Delaney, government affairs manager for the Professional Lawn Care Association, however, thinks the EPA guidance paper may encourage states that don't have posting to consider it. And, he says, "it increases the likelihood that environmentalists in states with no regulations will get their hands on this." Delaney specifically mentioned Texas and Minnesota, states that have already considered posting.

EPA's guidance document divides posting into three categories:

**Category A**, private lawns and lawns surrounding publicly-accessible buildings: 4x5-inch sign, graphic design will include an adult, child and dog standing on a lawn within a circle slash;

**Category B**, public parks, school grounds, recreational fields, cemeteries: 8½x11-inch

CATEGORY A

For private lawns and lawns surrounding publicly-accessible buildings:

**CAUTION, PESTICIDE APPLICATION. KEEP OFF**

(LAWN TREATMENT DATE)



sign, graphic same as Category A;

**Category C**, golf courses: 2x3-foot sign with no graphic.

EPA recommends that the signs have a bright yellow background with black lettering. Category A and B signs can be made of rigid *recyclable* (their emphasis) plastic or coated cardboard. Sign and printing must remain legible for up to 48 hours. The bottom of the sign should be at least 18 inches above the ground.

Wording for Category A and B: "Caution, Pesticide Application. Keep Off" in two lines with a third, bottom line displaying the lawn treatment date. On golf courses, the EPA is recommending the wording "Pesticides are periodically applied to this golf course" in letters 2½ inches high plus other information.

For turf treatments in either Category A or B, signs should be posted at all common or conspicuous points of entry, at least one sign for every 10,000 sq. ft. of lawn treated. On golf courses, signs should be posted at first and 10th tees or at a central clubhouse location.

The EPA says professional applicators are responsible for supplying and posting signs, while do-it-yourselfers will get theirs from retailers as part of a "good neighbor" policy.

The EPA did not rule out the possibility of instituting a national mandatory posting program.

"At this time, EPA has not made any determination as to the necessity of instituting mandatory Federal posting program in order to reduce or prevent unreasonable adverse effects," said the position paper.

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—Ron Hall