

## Turfgrass Producers International

### 6-Month TPI Effort Gets Results...

## EPA Clarifies Some WPS Issues, More Promised

With full implementation of the highly criticized Worker Protection Standards (WPS) having gone into effect as of January 1, 1995, TPI's six-month long effort to obtain modifications and clarification have yielded some positive results, and EPA officials are promising more in the future.

Following a 3-plus hour, face-to-face meeting between a special TPI-member task force and EPA officials, as well as numerous follow-up phone calls and correspondence, the Office of Prevention, Pesticides and Toxic Substances issued the following official positions:

#### "No Contact" Defined

The EPA has clarified the issue of "no contact" by stating the following: "The WPS allows workers to enter treated areas after inhalation or ventilation criteria have been met (usually 4 hours after application) without personal protective equipment (PPE) or time limit if there will be no contact with treated surfaces. Avoiding contact using PPE does not qualify as "no contact."

"No contact examples would include: 1) a worker in an open-cab vehicle in a treated area where plants cannot brush against the worker and cannot drop or drip pesticides onto the worker, or 2) a worker in an enclosed cab on a truck, tractor or other vehicle."

"In the case of workers on sod farms many of the jobs performed could be considered "no contact" depending on the specific circumstances. Since sod is a low growing crop, mechanical mowing, for example, would be no contact as long as the worker remains on the tractor or other vehicle while in the treated area."

"On the other hand, harvesting sod, even if partially mechanized, where the worker would manually stack the cut sod would constitute contact and could not be done during a restricted interval (REI.)"

#### "Worker Notification of Applications"

Another area of confusion for many sod farmers concerns the issue of notifying its workers about actual or pending

pesticide applications. While the EPA was able to clarify this issue regarding one requirement, they are continuing to explore exact details of another. Specifically, the EPA officials notified TPI of the following:

"The WPS requires that workers be notified of pesticide applications. Workers may be notified orally and/or by posting the treated area with the 'stern face' sign specified in this rule. For those pesticides with label language which specifies double notification, both methods must be used. For those pesticides whose labels do not specify, either method may be used."

Regarding the issue of central application information, the EPA said, "Discussions are continuing within the Agency to clarify the requirements for central posting, particularly when application schedules are revised or on large agricultural establishments. We expect to conclude these discussions by early March and will revisit this issue with you at that time."

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### Buyers Seek Turfgrass Sod Information TPI Needs Member Help in Tracking Articles

Hundreds of people, homeowners and professionals alike, from all parts of the U.S. are requesting turfgrass sodding information from the TPI office as a result of the organization's PR efforts. However, TPI is not receiving copies of the newspaper articles because area members are not sending them to the office for verification and tracking.

Based on news releases sent by TPI to over 1,400 writers and publications, turfgrass buyers from Maine to Florida, Minnesota to Texas and Virginia to California (and states in between,) are requesting complimentary copies of

TPI brochures about the benefits of sodding and the environmental advantages of turfgrass. Professional sod buyers are also provided a list of TPI members in their home state as well as a copy of TPI's "Guideline Specifications to Turfgrass Sodding" when they request information.

In order to be more effective, and to assess the results of its efforts, TPI asks all of its members to send copies of articles appearing in their newspapers. It would be best if the entire page of the newspaper containing the article is sent, as soon after publication as possible.



## TV & Radio Ads Available on Tape

Four brief advertisements about the benefits of turfgrass and the immediacy of sodding are available to TPI members as well as state-wide sod and turf associations for use in their local markets. Produced in 1992, and thus containing the ASPA name and logo, the close of the video tape "This Precious Earth" contains one 60-second and three 30-second promotions for turfgrass. The video may be purchased from TPI for \$25.

Although presented in video format, individuals should be able to take the tape to a local radio station and have the closing few seconds modified with their own identification information.

This could be done by a single grower who wants to advertise on radio, or by a group of growers such as a state association who would share the cost for production changes and advertising air-time.

## "Easy Lawn & Garden" Recommends TPI Members

Hitting the news stands just in time for the Spring market rush, "Easy Lawn & Garden" magazine, with over 100,000 paid circulation, recommends TPI members to sod purchasers. As part of its cover-featured article on seed selection for lawns, the magazine also offered tips on purchasing sod, provided to its editors by TPI.

"Installing sod is the quickest way to complete the 'lawnscapes,' no matter what the time of year," noted the editors in their opening line. The article closed by advising, "The homeowner's best assurance of quality is to purchase directly from a local sod producer; preferably a member of the Turfgrass Producers International."

industry. This could be in a question and answer, poster or pocket booklet format, with examples directly related to sod production practices.

**Members should note** that while federal EPA officials say they are more concerned about education than fines during the early stages of this program, enforcement will take place at the state level, where different attitudes may prevail. Members are encouraged to report their experiences with state-level enforcement officials to the TPI office.

## EPA Clarification of WPS (Continued from Page One)

### Sod Farm-use Product Labelling

Concerned that many pesticide manufacturers and formulators are choosing to eliminate sod farm use from their product labels and thus are effectively removing those products from the farm's inventory, TPI questioned the EPA officials about the cost and support available for non-sod farm use. The EPA stated that they do not require any additional scientific review for the WPS label and suggested manufacturers could choose to have a "split label" that would allow a product to be used on farms because it had the WPS information, while non-sod farm users could purchase the same product without the WPS label.

In their latest letter, the EPA stated, "Registrants (of pesticides) were instructed on the WPS requirements for labels

in Product Registration Notice 93-7. Registrants of turf pesticides could choose to 1) maintain the label and add WPS language, 2) delete sod farm use and add a statement, 'not for use on sod farms,' or 3) split the label, one for non-WPS uses and one for WPS uses, such as sod farms.

"Since sod farm use has been deleted from a number of labels, a label amendment would need to be submitted by the registrant to add sod farms and WPS language on a split label. Essentially, the registrant can have a split label for one registration, one with WPS language, and the other without WPS language."

The EPA has also proposed working with TPI to explore the possibility of producing a summary of the WPS requirements as they apply to the sod production

## Member Safety Tip

By William Campbell, Fairlawn Sod Nursery, Lynden, Ontario, Canada

A workplace inspection helps prevent injuries by identifying hazards, recording them, and taking corrective action. See sample below.

CHECKLIST ITEMS	YES	NO	TARGET DATE	HAZARD CORRECTED
• ARE ELECTRICAL OUTLETS IN THE SHOP PROPERLY GROUNDED WITH GROUND FAULT CIRCUIT INTERRUPTERS?				
• ARE FLOORS KEPT DRY AT ALL TIMES?				
• IS PERSONAL PROTECTIVE EQUIPMENT AVAILABLE (I.E. GOGGLES, HARD HATS, HEARING PROTECTORS)?				
• IS STOCKED FIRST-AID KIT AVAILABLE?				
• ARE WORK AREAS DEBRIS-FREE AND UNCLUTTERED?				
• IS THERE ADEQUATE LIGHTING TO PREVENT WORKING IN SHADOWS?				
• ARE SUITABLE RECEPTACLES AVAILABLE FOR OILY REGS, USED OIL, ETC.?				
• ARE THERE AT LEAST TWO EXITS AVAILABLE?				
• IS ADEQUATE, WELL-ORGANIZED STORAGE AVAILABLE FOR TOOLS AND EQUIPMENT?				
• ARE EXTENSION CORDS USED ONLY FOR TEMPORARY WORK?				
• ARE PORTABLE LIGHTS PROPERLY SHIELDED TO PREVENT BREAKAGE?				
• ARE PORTABLE TOOLS UNPLUGGED WHEN NOT IN USE?				
• ARE BENCHES TIDY AND DRAWERS KEPT SHUT?				
• ARE FIRE EXTINGUISHERS CONVENIENTLY LOCATED?				
• ARE FIRE EXTINGUISHERS INSPECTED REGULARLY?				
• ARE FLAMMABLE LIQUIDS PROPERLY STORED AWAY FROM ANY IGNITION SOURCE?				
• ARE VENTILATION FANS IN GOOD, WORKING ORDER?				



# Marketing Tip

By Leonard DeBuck, DeBuck's Sod Farm, Pine Island, New York

## Sod Ordering Program

**PROBLEM:** Because sod is perishable, many garden centers and resale nurseries are reluctant to speculate on orders.

Many just do not carry it because of:

a) the hassles involved with unrolling what does not sell, b) having it spoil (heat-up/ pallet burn,) or, c) ordering too little.

**SOLUTION:** We have devised a "sod ordering program" that entails the use of an innovative point of purchase display stand. We built a plywood frame,

supported by a four-legged stand which displays our sod in an almost vertical position. Across the front of this display of live, beautiful grass, is signage that states "SOD, ORDER YOUR LAWN AT THIS STORE," and copies of "The Dream Lawn is Yours In Hours With Sod" brochure from TPI. Because location is everything, we advise our garden centers to place this stand in a very visible, high traffic location.

**RESULTS:** This display stand's primary role is to encourage customers to inquire...and it works! Once the

inquiry is made, sales staff explain the benefits of sod, the preparation that is needed, and that because sod is harvested fresh daily, it must be pre-ordered and pre-paid (minimum 50% down.)

No sales tool works better than showing the customer the product itself. A picture on a seed box or bag is nothing more than a picture of what the lawn might be. However, the value of having the customer walk into this "door of turfgrass," and then ask "How do I get some?" speaks for itself.

# Taking Care Of Business

By Linda Tucker, Sodco, Inc. Slocum, Rhode Island

## Employee Benefits

What benefits to offer your employees is a question with a complicated answer.

There are several forces at work that shape the response. The two most powerful forces are market conditions and what you can afford to pay for benefits.

The first constraint is what other employers in your area are doing for similar types of jobs. Do they offer medical benefits, profit-sharing, disability, housing or vehicles in addition to standard vacation time? Your neighbors may decide for you what benefits you must offer.

The second constraint is the cost of benefits, over which you do have some control. At our farm, we take the following approach: "How can we give our employees the most benefit(s) for the money spent?" The answer is usually found in giving the employee benefits in pre-tax dollars (benefits that will not be taxable to the employee.)

In our state, (RI) farms are exempt from workers compensation. In lieu of workers compensation, we have provided all our employees with health and disability insurance. We have been able to do this for less than the cost of

workers compensation. The employee benefits because it is 24-hour coverage, not just coverage while they are working. We pay the disability insurance, but they (the employee) include the premium amount in their W-2, because if they ever have to collect, the benefits are non-taxable, if they have paid tax on the premiums. The health insurance is a non-taxable benefit to the employee.

We have had a profit-sharing plan for approximately 12 years. The profit-sharing plan is very flexible: If the company makes money, we can make a contribution for all qualified employees (those who worked 1,000 hours or more.) If we have a bad year, the contribution is reduced, or we can skip a year. We have made a contribution each year because we feel this to be a very valuable benefit to our employees. The money contributed is tax-deductible to the corporation, and tax-deferred to the employee. The contributions and the income the contributions earn is not taxable until it is withdrawn by them at retirement or termination. It is amazing how fast their accounts can build-up when the contribution is tax-deferred. For some, this is the only savings they will have at retirement.

We provide housing for some of our employees as well. This is a non-taxable benefit if they are required to live on the farm as part of their job. This is a great benefit, but we are limited as to whom it may be offered.

For some of our owner-operators, we lease their trucks, and then hire them to drive their own leased trucks. In this way, they are entitled to all the benefits of an employee, including unemployment compensation during our downtime. We can also insure their trucks on our fleet insurance at a substantially lower cost than they could individually. We reduce their 'freight check' by the cost of any benefit they want, therefore it does not cost the company any more than to hire them outright. The owner-operators end-up with more money in their pockets due to the reduced insurance premiums, non-taxable medical benefits, tax-deferred profit-sharing and unemployment benefits.

Every employee is different, and every farm situation is different. However, if you ask: "How can we get the most benefit(s) to the employee with the least cost to the farm?"...both the employee and the farm will gain, and as a result, employee benefits become mutually rewarding.



# TPI Action

**INS & DOL Gear-Up For Increased Enforcement** against illegal aliens by targeting agricultural employers with increased funding. TPI members should ensure that all employment documents and records are in compliance.

Responding to public sentiment opposing illegal aliens, increased budgets for the Immigration and Naturalization Service and the Department of Labor will result in more unannounced records inspections and other on-farm activities.

TPI members will want to ensure that their I-9 "Employment Eligibility Verification" forms have been fully and properly completed on all employees, and that wage, hour and pay records are up-to-date and complete.

TPI members attending the special pre-conference seminar in Orlando on labor issues also learned that caution must be taken to avoid discrimination charges when hiring by either requiring, suggesting or directing applicants to present documents for employment verification.

**Minimum Wage Increase Actions** are being tracked by TPI's Legal and Taxation Committee, with a plan already in place to call on TPI members if any of these proposals gain momentum. Concerned that such an increase would drive-up all other wage scales, or cause some employers to drop lower paid positions altogether, TPI's

Board of Trustees authorized the committee to oppose any unreasonable minimum wage increases and to ask members to contact their Congressmen if necessary.

**EPA Hears From TPI On Atrazine and Simazine** and their importance in the production of turfgrass sod, particularly in warm-season areas, as these triazine herbicides undergo an EPA Special Review. Citing numerous statistics and USDA reports, the EPA was told that if these products were removed or further restricted, "U.S. turfgrass sod producers would suffer significantly and perhaps incur irreparable harm to their family farm operations." Included in TPI's comments were the facts that atrazine and simazine are used on roughly half of all the sod acreage in the U.S. and that producers have found them to be among the least expensive herbicides still available.

**Severe Worker Shortage Projections**, as a result of increased illegal alien enforcement and high employment rates, have prompted a call for a new foreign temporary worker program by TPI and others joining together through the National Council of Agricultural Employers. Federal legislation would be required and actions have already been initiated to head-off what could become a very serious labor problem for seasonal worker employers.

## PR SCORECARD

May 15 - March 15 (the first 10 months)

### Mailings to Media & Members

Total: 97,998 pages

### Free Media Exposure:

Publications	49*
Separate articles	82*
Pages of information	91.6*
Circulation	3.76 million*
Advertising value	\$ 131,700*

### 1st-Aid Kits & Brochures Mailed to Architects, Contractors & Consumers:

330 kits  
94 consumers

(kits include state-wide member lists)

### Paid Advertisements:

#### *Landscape Architecture*

Two full page 4-color advertisements	
Circulation	40,000
Advertising cost	\$ 3,842

#### *Landscape Architect & Specifier News*

Two full page 4-color advertisement	
Circulation	16,538
Advertising cost	\$ 2,092
(ads scheduled for publication in April & May 1995)	

\* represents documented results gathered by the TPI office & information received from TPI members "in the field"

## BUSINESS MANAGEMENT

**Turfgrass Producers International**  
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U.S. POSTAGE  
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