

Are You Ready for

OSHA



By Bruce R. Williams

In my travels across the country I am seeing more and more emphasis placed on safety in the workplace. This can cover many issues, but I would like to concentrate on OSHA, which is the Occupational and Safety Health Administration. Many superintendents are unfamiliar with the laws and unfortunately are also not in compliance. This can lead to significant fines and possible business closure. It is a serious matter.

OSHA has a web site that you can refer to for more information: www.osha.gov and they can answer many questions that you might have. You may also want to consider utilizing a free consultation program called the Voluntary Protection Program. The VPP will allow you to have a representative of OSHA tour any portion (or all) of your facility and inform you what changes are required for compliance with OSHA standards. No fines will be assessed for noncompliance. However, there is a potential catch - you must mitigate any items within the specified timeframe given by the inspector. If you do not, it is possible that you will be turned in to OSHA and then be subject to fines.

Ever wonder what your chances are of receiving a visit from OSHA? The likelihood that OSHA will visit you is based on the following inspection priorities:

1. Imminent danger
2. Catastrophes, fatalities and accidents
3. Employee complaints
4. Programmed inspections and follow-up

Be aware that you are required to call the local OSHA office within eight hours if you have an employee fatality or an incident that requires hospitalization of three or more employees.

When OSHA Arrives

If OSHA visits your operation, their first request will be to view your OSHA 200 log and, as

of February, they now will request the OSHA 300, 300A and 301 logs. (The OSHA 200 and 300 logs are a compilation of your injuries and illnesses that have occurred throughout the year). The OSHA 300A form, with the prior year's information, is to be posted annually between Feb. 1 and April 30 on the staff bulletin board.

Health and Safety Policies

The next request will be to review all your health and safety policies, and also your training records. Below is a list of required policies:

- Blood Born Pathogen Policy
- Emergency Action Plan
- Hazard Communication Standard with MSDS training module
- Hearing Conservation Standard (if required)
- Lockout/Tagout Standard
- Permit Required Confined Space Policy (if required)
- Personal Protective Equipment Revised Respiratory Standard
- Fire Extinguisher Training

OSHA Standard 29 CFR 1910.157 covers training and education for employees on handling fire extinguishers. "Where the employer has provided portable fire extinguishers for employee use in the workplace, the employer shall also provide an education program to familiarize employees with the general principles of fire-extinguisher use and the hazards involved with the incipient stage of firefighting. The employer shall provide the education required in the preceding sentence upon initial employment and at least annually thereafter."

Site Tour

Common violations that are noticed in areas that golf course superintendents have responsibility are:

- CO2 tanks are not chained to the wall
- High voltage signage missing in mechanical areas or on buildings

- Eyewash/shower stations lacking or inoperable.
- Overloading electrical outlets
- Doorways cluttered with boxes or equipment.
- Fire extinguishers out of date or lacking tags.
- First Aid kits are not stocked
- Hazardous chemicals in close proximity to one another (oxidizers, flammables and corrosives)
- Proper personal protective equipment not available for staff (or the staff is not trained to use it)
- MSDS books do not have a table of contents.
- Employees observed are not using personal protective equipment (eyewear, earplugs, respirators, apparel)
- National Fire Protection Association regulatory four-color signage missing for gas, pesticide and other storage areas
- Storage of flammables in approved metal flame-proof cabinets
- Outdoor lighting/wiring missing protective covers and/or ground fault circuit interrupter needed
- Work areas may require yellow tape to designate walkways
- Missing machine guards on grinders and other equipment

Develop an Action Plan

Every golf operation should develop an action plan to analyze their current situation. A list of corrective measures can be developed with a time frame to implement those changes required. A budget will need to be established so that improvements can be implemented on a priority basis.

Try to do most of these improvements internally. When you think you have all the bases covered, then participate in the Voluntary Protection Program of OSHA. Keep your owners, GM, or green chairman informed of the laws and regulations. Document your communication so that you can later reference your recommendations.

*Credit: Peaks and Prairies GCSA,
The Perfect Lie, May 2003*

Editor's Note: In today's litigious society, a superintendent may well find himself as a co-respondent with the club in a lawsuit resulting in employee injury if proper safety precautions have not been taken or enforced. As Williams says, "Document all communications..." to show you are trying to abide by the law at all times.

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Golf Course Wash Pads: Simpler Than You Think

By Mike Saffel

This past season we completed a major renovation of our maintenance facility area. We built an office building, added a fuel station, expanded our shop, and constructed a wash pad. At first I was sure that the wash pad would be a most difficult and complicated, environmental nightmare. It was not.

This is not too surprising when you read all the articles and see high-tech recycling equipment on the market today. I wondered if we would have to add staff just to maintain the wash pad and equipment. When Derek Lowe and I talked to the wash-pad and recycling vendors, we were concerned with how to handle final waste product, the time and training involved in maintaining the system, the material costs, trying to out-guess the moving target of government regulation, and the high cost of purchase and installation.

As we did not come up with sound answers on our own to these questions, we sought an independent source of information. Greg Lyman, turfgrass environmental specialist, Michigan State University proved to be that rare person who can answer your questions and guide you through the process. We knew from experience that Michigan has strict environmental requirements, so it seemed logical to start there and adapt their specifications.

Michigan requires a leach field much like a septic system. The wash pad is sloped to the drain grate, and then piped to a leach field where the water percolates through the soil and removes the bulk of the unwanted material.

The problem these people encountered was that the leach fields quickly filled with grass clippings.

Undaunted, ever-resourceful superintendents modified the leach field. They first laid down a pad of pea gravel or other porous material and then laid the pipe on the surface of the porous material, covered the pipe with a geotextile material and more pea gravel (to cover the pipe and hold the geotextile in place.) This allowed them to simply pull the covering back to access the pipes.

Two methods of cleaning the pipe were employed. High-pressure water from the irrigation system was used to clear the pipes. Another method was to route the piping of the drain field to a 12-inch pipe and use a five-gallon bucket as a cleaning tool. According to our information, the large pipe had to be cleaned only a few times a season. This allows for much easier collection of the clippings that can then be spread on the property with a rotary-type topdresser or added to a compost pile.

Greg sent us a complete set of instructions and designs that were presented to the

Wyoming Department of Environmental Quality.

They were approved with no changes. The result was no expensive equipment, little extra labor, no bug-farming training, and no trying to guess what the environmental departments of our states settle on for regulations.

It was interesting to note that, with all of the negative press the regulating agencies get, we found that they were more willing to work and adjust to different ideas if they are based on sound science, and if examples were provided to them for comparison. It was important to realize that the regulators struggled with many of the same questions that challenged us. If approached from a problem-solving point of view with some options and plans, we found our chance of smooth approval was high.

If you would like the complete file I received from Greg Lyman, let me know and I will get it to you. Keep it simple and good luck.

Credit: *Peaks and Prairies GCSA, The Perfect Lie, May 2003*

Cautionary Note for Florida

For Florida guidelines see:

- the May 1998, "Best Management Practices for Agrichemical Handling and Farm Equipment Maintenance" by the Florida Dept of Agriculture and Consumer Services and the Florida Dept of Environmental Protection;
- "Building Plans and Management Practices for a Permanently-Sited Agricultural Mixing/Loading Facility in Florida." SM-58, 1997, IFAS Publications Office, UF/IFAS, PO Box 1100011, Gainesville, FL 32611, Phone (352) 392-1764;
- "Minimum Construction and Operation Standards for Chemical Mixing Centers used for Pesticide Mixing and Loading." FDEP, Nonpoint Source Management Section, MS-3570, 2600 Blairstone Rd., Tallahassee, FL 32399-2400. Phone 850-921-9472.

While this Wyoming solution to washpads may not reflect Florida regulations, it does offer several valuable lessons:

- (1) Non-point source pollution and Total Maximum Daily Load regulations are coming across the entire country - so be prepared to clean up your act if you don't have a compliant mix/load/wash pad area;
- (2) You can be proactive and cooperative or you can comply under threat of fines and lawsuits. If your facility is not addressing this problem and is not operating on an impervious surface to collect and/or recycle rinsate from mixing or washing operations you are only delaying the inevitable and may be headed for an expensive hazardous waste clean-up citation.

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