A full-page photograph of a golf course. In the center, a golfer is on a green, possibly preparing for a putt. A golf cart is parked in the background near some trees. A vibrant rainbow arches over the scene, its colors blending into the sky and the green of the grass. The overall mood is serene yet dramatic due to the rainbow.

OSHA Is Watching You

A

n Arkansas golf club inspected by the Occupational Safety and Health Administration (OSHA) as the result of a complaint was fined \$5,250 for four "serious" violations and three "other" (lesser) violations. The violations ranged from an inadequately written Hazard Communication Program to electrical

hazards to improper safety guards and violations of OSHA's personal protective equipment (PPE) standards.

In Hawaii a public golf course that faced \$1,125 in OSHA penalties following a partial inspection had the penalties reduced to \$570. Yet that same golf course paid \$7,800 in fines following a complete OSHA inspection, which revealed six "serious" violations of OSHA standards.

And in Colorado a small public golf course investigated by OSHA after the death of a 35-year-old worker initially faced \$22,100 in penalties for three "serious" violations of OSHA's construction standards. The penalties were later reduced to \$9,500 for a single violation of OSHA's "general duty" clause, which requires employers to maintain a safe workplace for

employees. The worker was killed when a large wall of dirt collapsed on top of him as he was fixing an irrigation system leak.

These incidents are among the pages and pages of OSHA citations found in 159 inspection reports of public golf courses around the country in a recent three-year period (Feb. 9, 2002, to April 7, 2005). A review of these reports and the corresponding OSHA standards by *Golfdom* found:

► A number of golf courses that were unexpectedly visited by an OSHA inspector were cited for very high numbers of violations, including as many as 14, 26, 27 and 38 violations. In one case a golf course in New Jersey was cited for 29 violations, while OSHA inspectors found another 14 violations at the clubhouse.

► Despite several employee fatalities at golf courses around the country, accidents are not the primary reason why OSHA shows up at golf courses. In fact, most of the 159 inspections were "planned" inspections (where OSHA focuses on a certain industry with a high number of hazards and associated injuries). The No. 2 reason for OSHA inspections is complaints, followed by accidents and followed by inspections for various other reasons.

► There are no particular trends indicating how a golf course is likely to

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Golf courses inspected by the Occupational Safety and Health Administration could face multiple citations, time-consuming probes and fines

BY BARBARA MULHERN

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get into trouble with OSHA. In addition to the violations already mentioned, others found in the 159 inspection reports we reviewed included (but were not limited to): improper storage of flammable/combustible liquids, inadequate machine guarding, use of defective portable ladders, improper exit routes, failure to have an established lock-out/tagout program, and improperly maintained fire extinguishers.

► A number of golf courses with multiple OSHA violations were able to abate them by an agreed upon date and escape paying any fines. This was the case for the New Jersey golf course and clubhouse that initially faced a total of 43 violations.

Superintendents' Basic OSHA Compliance Checklist

✓ **Understand the OSHA standards that affect your operation.** Two good resources are: OSHA's Web site (www.osha.gov), and the Golf Course Superintendents Association of America (800-472-7878 or www.gcsaa.org).

✓ **Know whether you operate in a state with a state-run OSHA program.** If so, you may have to comply with even stricter standards than the federal OSHA standards. To find out, visit www.osha.gov, click on "S" at the top of the page, then on "State Plan States."

✓ **Continuously post OSHA's Job Safety & Health Protection poster or the newer You Have a Right to a Safe and Healthful Workplace poster in a central location where it can be seen easily by employees.** (You can download the required poster at no cost from OSHA's Web site.) Also, ensure that you meet any state-specific OSHA posting requirements.

✓ **Comply with OSHA's injury and illness record-keeping rules.** Maintain an OSHA Form 300 Log of Work-related In-

juries and Illnesses for the current calendar year. Use the OSHA Form 301 Injury and Illness Incident Report to record supplementary information. Also, fill out the OSHA Form 300-A Annual Summary of Work-related Injuries and Illnesses at the end of the year and post it where you post other employee notices from Feb. 1 until April 30 of the following year.

✓ **Implement a Written Hazard Communication Program.** This is one of OSHA's most often cited violations against employers. Make sure your program includes training for employees, plus the maintenance of current material safety data sheets (MSDS) and a listing of all hazardous chemicals used in your operation.

✓ **Notify your nearest OSHA area office (or call 800-321-OSHA) within eight hours of any work-related fatality or incident that results in the hospitalization of three or more workers.**

✓ **Implement a proactive written safety program.** This will go a long way in showing "good faith effort" should you

'Wall-to-wall' inspections

Rich Fairfax, director of OSHA Enforcement Programs in Washington, D.C., says the golf industry is one industry OSHA didn't "look at much in the past, and the types of inspections we did then were the result of either complaints or accidents." When an OSHA investigator comes in as a result of a complaint or an accident, the scope of the inspection is generally limited.

Now, however, OSHA offices in many areas have targeted the golf industry for "planned" inspections — those where the inspector shows up at a golf course and goes from "wall to wall" to look for any and all safety hazards.

"Planned inspections are comprehensive inspections — we call them 'wall-to-wall' — and we try to address all of the safety hazards," Fairfax says.

Inspectors will review the maintenance shop, chemical storage area and employee use of personal protective equipment.

Andrew Trinkino, superintendent at the Fountaingrove Golf & Athletic Club in Santa Rosa, Calif., says he's not surprised golf courses visited by OSHA inspectors are often cited for multiple violations. The reason, he says, is because when OSHA thoroughly inspects a golf course these days, the inspector looks not only at the clubhouse — which Trinkino calls the "centerpiece" for the club — but also at the maintenance facility, which might be old and crowded with equipment, fuel and chemicals that don't meet OSHA's standards for proper storage.

"Because owners want perfect (golf course) conditions for the public, they buy some newer equipment but also keep the older equipment, and there's not enough space in the [maintenance facility to store it]," Trinkino says.

Carrie Riordan, director of Information and Public Policy at the Golf Course Superintendents Association of America (GCSAA), says the questions she receives from members about OSHA compliance "really run the gamut." Most questions are about signage, recordkeeping for injuries and illnesses, and documenting and instituting safety-training programs, she says.

"We also get a lot of questions about hard hats, eye protection, noise protection and how to conduct a job hazard analysis to determine what PPE is required," she adds.

REVISED MAY 10, 2005
2005 DAILY JOB ASSIGNMENTS

GREENS: GKE

- 1 Cortar greens a mano (Toni)
- 2 Cortar greens con triplex
- 3 Preparar el campo
- 4 Pisar los greens
- 5 Regar
- 6 Fumigar y Fertilizar
- 7 Aterado
- 8 Verticorte
- 9 Aterado
- 10 Remover las hojas
- 11 Rolar los greens
- 12 Pasadas de limpieza a mano
- 13 Cortar greens a mano (Jakes)

MOWED ROUGHS: ROH

- 1 HR-5111
- 2 Toro Sidevinder
- 3 Nacional alrededor los tees
- 4 Cortar con Stewer
- 5 Cortar los intermediales
- 6 Fumigar y Fertilizar
- 7 Intermediales alrededor de los greens
- 8 Juntar basura
- 9 Sazon de tres cuando rotatoria
- 10 Riego
- 11 Boreques
- 12

CASA CLUB: CLU

- 1 Cortar las en el parqueadero
- 2 Limpieza general
- 3 Orillar y agregar mulch en las jardinerias
- 4 Apoyar arboles y plantas
- 5 Cortar la entrada u el círculo
- 6 Cortar alrededor del patio de a tras
- 7 Cortar la ladera de mercedon de
- 8 Cortar nevillwood di
- 9 Cortar alrededor de la alberca
- 10 Mantenimiento de las jardinerias de flor
- 11 Pasto y semilla
- 12 Retirar la nieve
- 13 Mantenimiento de las UNIVES
- 14 Cortar

MANTENIMIENTO DE TEES: TEE

- 1 Limpieza de tees a mano
- 2 Cortar con Triplex todos los tees
- 3 Cortar tees y limpiezas con triplex
- 4 Cortar a mano solo los colleres
- 5 Cortar a mano los colleres y chipping areas
- 6 Cortar con Triplex tees y chipping areas
- 7 Regar
- 8 Fumigar y Fertilizar
- 9 Aterado
- 10 Verticorte/picado
- 11 Atericacion
- 12 Bando de hojas
- 13 Cortar a mano todos los tees
- 14 Triplex azules/blancos/par3
- 15 Reparar divots
- 16 Limpiar las marcas de yardage

FAIRWAYS: FWY

- 1 Fairways LF 3420
- 2 Cortar los hwy con Triplex
- 3 Cortar solo approaches
- 4 Recoger los chippings
- 5 Orillar regulares y coladeras
- 6 Reparar los divots
- 7 Riego
- 8 Fumigar y Fertilizar
- 9 Aterado
- 10 Verticorte/Picado
- 11 Atericacion
- 12 Atericacion de approaches
- 13 Recoger las hojas
- 14 Limpieza de fairways con triplex
- 15 Dragar el roco
- 16 Llevar arena a la casa club

TRAMPAS: BUN

- 1 Raquar las trampas
- 2 Checar las trampas (nueva y viejas)
- 3 Raquar trampas viejas
- 4 Flymo
- 5 Riego
- 6 Fumigar y Fertilizar
- 7 Orillado y Deslervar
- 8 Agregar o quitar arena
- 9 Juntar basura
- 10 Pasto y semilla
- 11 Borear agua
- 12 Arreglar los deslavados

JARDINES DEL CAMPO: LAN

- 1 Deslervar, orillar y agregar mulch
- 2 Raquar plantas y arboles
- 3 Lagunas y cascadas
- 4 Tuleles
- 5 Podado de arboles
- 6 Mantenimiento de jardinerias
- 7 Jardinerias de los belvedereos
- 8 Casa pequena
- 9 Bonques

PRACTICE RANGE: RAN

- 1 Barrer tee de practica
- 2 cortar tee de practica
- 3 cambiar lazo en el tee de arbo
- 4 cambiar lazo en el tee de abaje
- 5 rellenar los divos
- 6 Cortar los greens de practica
- 7 raquar las trampas de practica
- 8 Mueblaciones

PASTO NATIVOS: NAT

- 1 Cortar
- 2 Barrer y rastrear
- 3 Fumigar y Fertilizar
- 4 Siembra
- 5 Reparaciones
- 6 Regar

TRAMPAS: BUN

- 1 Raquar las trampas
- 2 Checar las trampas (nueva y viejas)
- 3 Raquar trampas viejas
- 4 Flymo
- 5 Riego
- 6 Fumigar y Fertilizar
- 7 Orillado y Deslervar
- 8 Agregar o quitar arena
- 9 Juntar basura
- 10 Pasto y semilla
- 11 Bombear agua
- 12 Arreglar los deslavados

Double whammy

Many golf courses around the country employ a high percentage of Hispanic/Latino workers with limited English language skills. Golf courses that fall into that category are at special risk of scrutiny by OSHA because of the federal agency's major emphasis on the safety of Spanish-speaking workers.

At the Club at Neville-wood, near Pittsburgh, job assignments are posted in English and Spanish.

An Associated Press report released last year revealed that a Mexican worker in the United States is four times as likely to die as the average U.S.-born worker, and that Mexican workers in the United States die on the job at the rate of one per day. OSHA's own statistics show that one-quarter of the fatalities the agency investigates are related to language or cultural barriers.

"There are increasing numbers of Spanish-speaking persons on OSHA's compliance staff," Fairfax says, adding that if OSHA does an investigation and an employee doesn't speak English very well, "we'll bring back [an OSHA employee] who speaks Spanish. We always have to interview the employees."

Ron Jester, extension safety specialist at the University of Delaware, says superintendents who want to train their

Continued on page 44

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Positive reinforcement for safe actions is also a good motivator when training workers.

Continued from page 43

Hispanic workers effectively must “understand that cultural distinctions lead to different ways of thinking.”

“Safety trainers need to understand the motivation of Hispanic workers,” Jester says. “If you tell an American (Caucasian) worker that he could get sick and die if he doesn’t wear a respirator, you will motivate him [to wear one]. With Hispanic workers (whose culture places a high importance on “family”), you need to say, ‘If you fail to wear this respirator, you could get sick and be unable to provide for your family.’”

Superintendents who want to train Hispanic workers effectively should also consider using Hispanic safety-training instructors, whenever possible, and should provide hands-on training, which allows workers to actually demonstrate the personal protective equipment or other equipment they will use, Jester suggests. Positive reinforcement for safe actions is also a good motivator when training both Hispanic and non-Hispanic work-

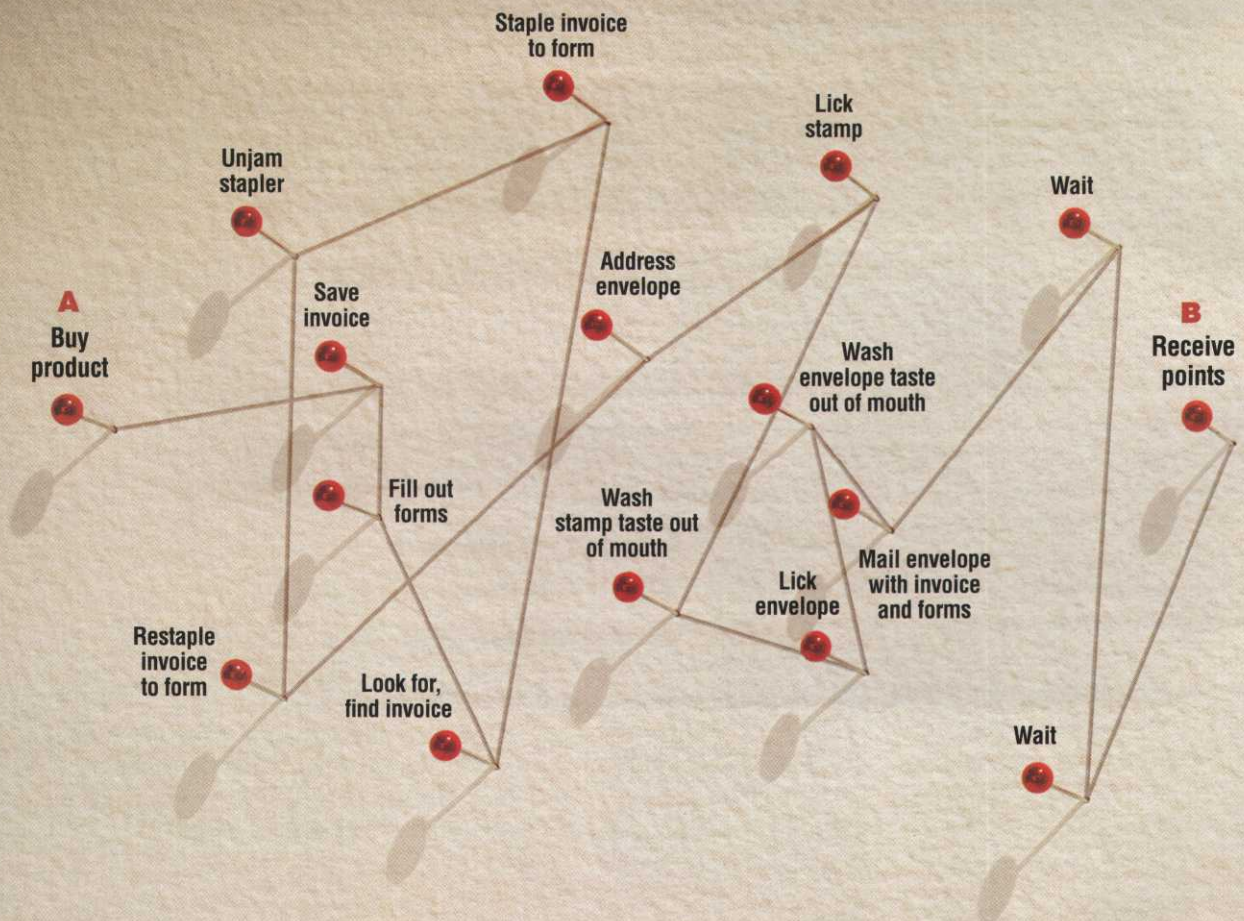
ers, he adds.

“Unless Hispanic workers trust you, they may not be willing to discuss training and work procedures,” Jester continues. “Consequently, using Hispanic instructors will often relax trainees, and they are more comfortable asking questions. Hands-on training with positive reinforcement is an excellent way to increase safety understanding.”

Being proactive

Regardless of the composition of your work force, there are many steps you can take to increase the safety of your employees and stay out of trouble with OSHA. Steve Numbers, superintendent at Westfield Group Country Club in Westfield Center, Ohio, says that because his golf course is owned by an insurance company, “being proactive about safety is an easy sell.”

Numbers says Westfield has an annual safety and loss prevention inspection, where the owners inspect both golf courses and make recommendations for improvements as



needed. Those improvements could have to do with things ranging from proper oil storage to marking of exits.

"We also have a safety committee for the company. Each of the two golf courses has a representative on it that goes to the meetings once a month," Numbers says.

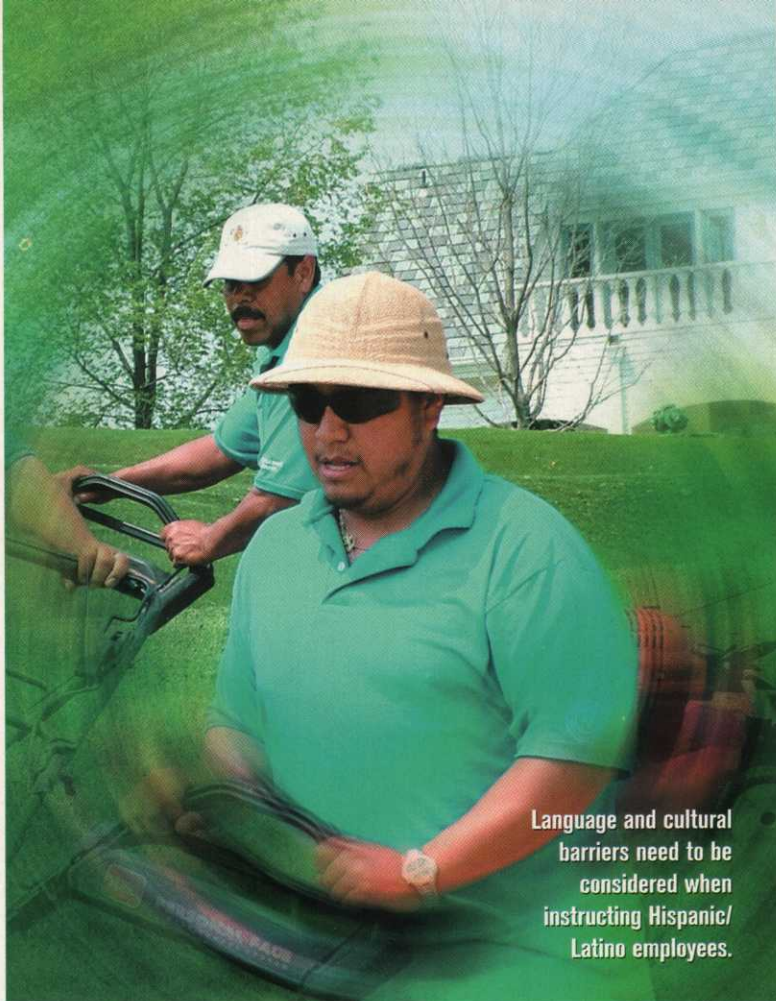
Even if an insurance company does not own your course, you can ask your workers' compensation carrier to assist you in conducting regular on-site safety audits. These persons often have checklists that you can use.

Numbers says his golf course also does the following, which can be done by any golf course, to be more safety-conscious:

- ▶ Displays safety-first emergency procedures in all areas — what to do in case of a fire, power outage, tornado, broken water pipe, chemical spill or gas leak, as well as what to do "if someone should threaten you on the phone or in person" or send a suspicious package.

- ▶ Strictly enforces safety rules, such as when hard hats or respirators must be worn.

Continued on page 46



Language and cultural barriers need to be considered when instructing Hispanic/Latino employees.

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Effective Safety Training for Hispanic Workers

✓ **Conduct training orally and in a language your workers understand.** Remember that there are different dialects of Spanish. If most of your Hispanic workers are from Mexico, enlist the help of a bilingual Mexican worker or supervisor.

✓ **Do not assume that all of your workers can read** — even in their own native language. Educational opportunities in other countries are often very limited.

✓ **Use drawings, photos and other visual aids to supplement your training.** But don't rely on a video alone, even one in Spanish. Make sure someone is available who can answer workers' questions.

✓ **Understand your workers' cultures.** Know, for example, that in many Hispanic cultures it is considered disrespectful to question persons in authority or to maintain direct eye contact.

✓ **Make sure all key safety signage is in both English and Spanish,** and that it includes symbols (pictures) if at all possible.

✓ **Consider a mentoring system** where a more experienced Hispanic employee is paired with a new Spanish-speaking employee to explain safety issues and assist in any safety-related problems.

Continued from page 45

▶ Holds training programs each spring on cardiopulmonary resuscitation (CPR), lightning and other safety issues.

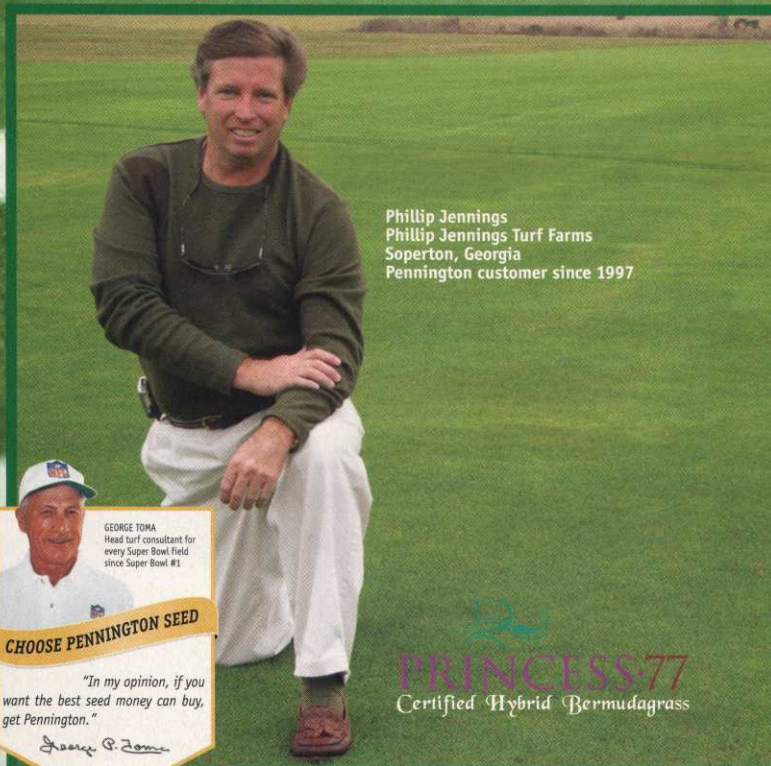
▶ Has employees mark off items on weekly checklists to ensure they remember to wear their safety goggles and follow other safety-related rules.

"Safety training does not have to be expensive," Riordan says. "OSHA materials are available free online (www.osha.gov), and we can help direct superintendents to other resources, such as the State OSHA Consultation Service. Also, superintendents are good about networking — they can call their peers and find someone with a good safety program.

"Golf course facilities need to make sure they're in compliance with all OSHA regulations," Riordan continues. "And you have to have zero tolerance when someone violates a safety rule at your golf course." ■

Barbara Mulhern is a freelance writer from Belleville, Wis.

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