



Hazardous Communication Plans Are Required By Golf Courses

By Michael Semler

The onset of cold weather is coming and this should serve as a reminder to all of us to bring out our compilation of Material Safety Data Sheets (MSDS) and determine whether we need to file the SARA reporting requirements.

It is also a reminder to all of us to formulate our plan to comply with the Hazard Communication Standard established under OSHA (Occupational Safety and Health Administration).

Enforcement of the Hazard Communication Standard expanded in May, 1988 to include any company using or producing hazardous materials in the workplace. This includes golf courses!

However, do not confuse OSHA's interpretation of a hazardous material with that of the EPA under the SARA reporting requirements. OSHA's interpretation of a hazardous material is any element, chemical compound or combination of the two which may pose a health risk. In essence, this is a broad list of materials and may include such items as pesticides, the chemicals in pressure treated lumber, the vapors given off in welding and many other compounds we may not think of as hazardous.

The hazardous Communication Standard has four major elements that relate to the industry, and all must be abided by to remain in compliance with it.

The first element is that employers must keep a list of all hazardous materials present at the workplace. Employers must also have the current MSDS sheets on hand for all of these materials and they must be available to all employees.

Second, the containers for these materials must have the name of the manufacturer, the name of the chemical compound, and the potential adverse effects on the label. This includes, for instance, a 2 gallon container used to fill from a 30 gallon drum. This 2 gallon container must also contain a label with the chemical name and the risks associated with it.

The third requirement is that employers must maintain a written explanation

of the means necessary to comply with the safety aspects of the law. Oral explanations to employees will not meet compliance regulations. They must be in writing.

The final requirement is that employees must receive training in the proper use of the chemicals. OSHA lists minimum employee training levels for employers to remain in compliance. This training is essential. Not only must employees have access to the MSDS sheets and have a written explanation on the proper procedures necessary to comply with the elements of the safety standard, but employers must make sure the employees understand it.

This all sounds confusing, but it really is not. The first step any of us should take is to contact the state OSHA office in Madison (telephone 608-266-9383) and ask for their information packet on the Hazardous Communication Standard. This packet will clearly explain what needs to be done by superintendents to set up a good Hazardous Communication plan, as

well as, given an example of a written program which meets their criteria. It will also list many possible hazardous materials that may exist in the workplace.

The second step is to list all hazardous materials you have on hand during the year. Then make sure you have the MSDS sheets for them and have copies available for your employees to review.

Finally, have a written program for the proper safety procedures necessary to follow OSHA's regulation and make sure employees understand it.

In 1988 alone, over \$1 million in fines and penalties were levied against companies who were not in compliance with OSHA's Hazard Communication Standard. Golf course maintenance facilities may not rank high up on the list of offending companies, but we are now in a position to have a leg up on OSHA and remain off that list.

Remember this is not legal advice. For that, see your own or your company's attorney.

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