

OSHA REQUIREMENTS

FOR ROLLOVER PROTECTION/SEATBELTS AND HEAD PROTECTION

The letter from Terry Mueller, OMT Director of Minnesota OSHA and the session at the MGCSA mini-seminar with Don Strot, Senior Safety Investigator of Minnesota OSHA, has left Minnesota Superintendents and Club Officials with many questions, concerns and anxieties over the requirements and enforcement of ROP's and head protection.

No one objects to improving safety standards in the work place. It is part of our responsibility to provide safe working conditions for employees and to take a positive approach to the statute.

MGCSA is working with Minnesota OSHA on these issues. It is important to identify misinformation and concerns, and to get correct answers out to MGCSA members.

The following is a list of questions and concerns regarding OSHA's statute on ROP's and head protection. These questions come from MGCSA members. The MGCSA Board of Directors has worked on answering these questions as accurately as possible. If you have other questions or need more information, please contact Minnesota OSHA Division.

- 1. What is OSHA's definition of flat terrain, and do golf courses fall under this definition with elevated greens/tees and bunker banks?** The definition of flat terrain is having no pitch or hills. Golf courses do not fall under this definition with the exception of some driving ranges.
- 2. Does governing down or modifying engines to decrease horsepower under 20 h.p. meet the requirements?** No, whatever horse power is stamped on the engine is what Minnesota OSHA will go by.
- 3. Are three-wheeled vehicles and mowers equipped with engines under 20 h.p. exempt from the statute?** Yes.
- 4. With the sudden increase in demand for ROP's on existing equipment, some manufacturers and distributors cannot fill all orders for several months. What documentation, if any, is needed by Superintendents to demonstrate that ROP's for existing equipment have been ordered?** To the best of our knowledge, no documentation from manufacturers or distributors is needed. Superintendents need to put together a program for ROP's installation on existing equipment and have it on site.
- 5. If a piece of equipment is scheduled to be replaced, does it need ROP's installed? If no, is there a time period for which the piece of equipment must be sold or traded in?** May 1, 1996. In your plan, explain the situation with that piece of equipment and request an exemption for ROP's installation.
- 6. Is the Minnesota Department of Labor and Industry Safety Grants Program applicable for meeting the requirements? If yes, whom is eligible for the grants and who do people contact for more information on the grants?** Yes, golf courses are eligible for the grants. For more information or application contact James Collins, Workplace Safety Consultation at 612-296-5433.
- 7. If ROP's are not available for older equipment, is there a manufacturer that can fabricate ROP's that meet OSHA standards?** Yes. Custom Products, Box 718, Litchfield, MN 55355. Phone: 1-800-222-5463 or 612-693-3221.
(Note: Some non-commercial/non-industrial equipment may be exempt from the statute. If you have a piece of equipment in question, contact Minnesota OSHA on its exemption policy.)
- 8. With the back orders on ROP's for existing equipment and the sudden financial burden this may bring to golf courses, why is OSHA not willing to provide a grace period for implementation of the program?** To the best of our knowledge, there will be a grace period to May 1, 1996 — but you need to get started on your plan.
- 9. Is screening on equipment required to protect employees from flying objects (golf balls)?** No, but it is highly recommended.
- 10. What is OSHA's definition of head protection and what type of head protection meets the standards?** To the best of our knowledge, any types of safety cap that meet or exceed ANSI Z89.1 specifications for impact resistance. *(see standards)*
- 11. Who is required to wear head protection on the golf course?** Any employee, employed at your facility, that is on the grounds, who may be exposed to flying objects (golf balls) is required to wear head protection. Non-employed personnel, such as green committee/board members, contractors, sales representatives/distributors or outside service personnel are exempt from the statute.

If you have other questions or concerns, please contact the Minnesota OSHA Division at 612-296-2116. Remember your main objective is protecting the interest of your facilities and the safety of your employees. Don't ignore it. Get started on your programs and take a positive approach to this issue.

— Human Resources Committee
Reviewed by Terry Mueller
OMT Director of Minnesota OSHA