

Twelve Steps to Safety

Step Four: Hazard Communications

By Alan Achatz, CCM, CHE

In September 2003, CMAA signed an Alliance with OSHA to promote safe and healthful working conditions for membership club employees in the areas of hazard communication, recordkeeping and respiratory protection. In February 2005, CMAA renewed its Alliance and added a new scope of concentration, landscaping and horticulture. The Alliance was again renewed in October of 2007. This article, the fourth in a series of 12 articles, was written by club industry expert Alan Achatz, CCM, CHE, of AKA Capitol Adventures in conjunction with participants in the OSHA and CMAA Alliance. The purpose of this series is to help new and seasoned managers embark on a path to safety compliance at their facilities.

Clubs – whether athletic, beach, city, country, golf, or any of the others comprising CMAA membership – continue to be cited by OSHA for violations of the Hazard Communication Standard.

This article is written to guide club managers on how to set up a hazard communication program, maintain Material Safety Data Sheets (MSDSs) book(s), request missing MSDSs, train the employees and comply with one of the OSHA standards most violated by clubs. The intent of this article is to raise awareness of the hazard communication standard and show employers that compliance with the standard can help ensure that all employees return to work tomorrow as healthy as when they arrived today!

Starting a Hazard Communication Program

The OSHA Hazard Communication standard (HCS) (29 CFR 1910.1200) requires covered employers to develop and implement a written hazard communication program for each workplace in which there is exposure or potential exposure to hazardous chemicals. The program must include the following elements:

- A list of the hazardous chemicals in the workplace.
- An explanation of the labeling system in place.
- Procedures for collection, maintenance of and employee access to MSDSs.
- An employee training program.
- The methods that the employer will use to inform employees about any non-routine tasks that may pose chemical exposure hazards.
- The methods that the employer will use to inform employees of the hazards associated with chemicals in any unlabeled pipes in their work areas.
- Where applicable (i.e., multi-employer worksites), the methods the employer will use to inform

other employers of the labeling system used in the workplace and on-site access to MSDSs, and any precautionary measures the other employer's employees must take.

The written program should also specify the staff members who are responsible for implementing and updating the program.

Compiling a MSDS Book

Compiling a book with all the Material Safety Data Sheets (MSDS) is probably the most time-consuming part of setting up a hazard communication program. The club should conduct a full chemical inventory and then compare the list of products to the MSDSs on hand. If you are missing a MSDS, request it from the company that supplied the specific product.

It is recommended by CMAA that each and every department have their own catalog of MSDSs. If desired, the MSDS can be maintained electronically or in paper form, usually a binder or book. The binders, computer, or other means of obtaining MSDSs must be readily accessible to employees while

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they are in the work the area. "Readily accessible" means, for instance, that employees must be able to access MSDSs without having to request them. That is to say, the book/computer can't be locked up or under a supervisor's control and the MSDS can't be locked up if employees are still working with the products.

There must be a hazardous chemical inventory listing all the products in the MSDS book. If you have an MSDS book with multiple types of products or numerous departments, CMAA recommends that each section has a table of contents. For example, a golf club's grounds department book would be alphabetized and include tabs and a table of contents for each of the following sections: Cleaning Products, Fertilizers, Fungicides, Herbicides, Insecticides, Miscellaneous Items, Petroleum Products, Paints and Rodenticides.

Ready access to MSDSs is always required and can be critical. For instance, in the event of an adverse reaction presumed to be caused by exposure to a hazardous chemical, the MSDS of the offending chemical can provide information on first aid and could be useful for medical care.

Chemical Labeling and Incompatibilities

Certain chemicals cannot be stored next to one another or, worse yet, be mixed together. Unfortunately, some club employees have learned this lesson the hard way!

The only way to know this is to read/review all MSDSs and recognize these various incompatibilities. Bleach is probably the one chemical found in most clubs that reacts adversely with most other products.

Clubs should also ensure that all chemical containers are properly marked with their contents. Some

employees assume that the 'blue' product in a spray bottle is window cleaner, which it may or may not be.

Employee Training

Employee training that is understandable to each employee must be conducted at the time of the employee's initial assignment and whenever a new hazard is introduced into the work area. The training must include the requirements of the HCS; operations where hazardous chemicals are present; the location and availability of the written program; methods and observations that may be used to detect the presence or release of a hazardous chemical in the work area; the physical and health hazards of the chemicals in the work area; the measures the employee can take to protect themselves, including specific procedures the employer has implemented to protect employees from exposure to hazardous chemicals; and the details of the hazard communication program developed by the employer, including an explanation of the labeling system, the material safety data sheet and how employees can obtain and use the appropriate hazard information. Obviously, the training for the chemicals a pesticide applicator might come into contact with will be much more extensive than for a dishwasher.

All club employees who potentially might be exposed to hazardous chemicals must be trained.

Records

CMAA recommends that you keep records of employee training to document it has been conducted. This is not an OSHA requirement, however, under the Hazard Communication Standard.

Material safety data sheets are considered exposure records and must be kept for a period of 30 years unless



there is another record of the identity of a substance or agent (such as the chemical name on the hazardous chemical inventory), where it was used and when it was used. This information must be retained for at least 30 years.

Personal Protective Equipment

The MSDSs also list the appropriate protective equipment that employees should wear when using the product.

Recognize that it is preferable to reduce an employee's exposure to any hazard through engineering controls (e.g. ventilation controls); administrative controls (e.g. limiting time/duration of exposure); substituting a different product; or by varying work practices to avoid the hazard, than to require the employee to wear protective equipment.

If employees do wear protective gear they must be trained and knowledgeable about its selection, use, care and limitations.

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Eyewash Shower Stations and Eyewash Bottles

This topic could be an entire article. Under OSHA standard 1910.151(c), 1910.151(c), "Where the eyes or body of any person may be exposed to injurious corrosive materials, suitable facilities for quick drenching or flushing of the eyes and body shall be provided within the work area for immediate emergency use."

In locations where any employee is exposed to splashing chemicals, it is important to provide any or all of the following: a directly plumbed station, portable system containing six or more gallons or "eye wash bottles."

Additional Resources

Hazard Communication Safety and Health Topics Page: <http://www.osha.gov/SLTC/hazardcommunications/index.html>.

Model Plans and Programs for the OSHA Bloodborne Pathogens and Hazard Communications Standards, OSHA Publication 3186 (2003): <http://www.osha.gov/Publications/osh3186.pdf>.

OSHA Policy Statement on Employee Training: http://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=INTERPRETATIONS&p_id=25658.

For more information on how your club can benefit from the Alliance and OSHA topics specific to the club industry, including archives of previous articles in this series, please visit <http://www.cmaa.org/legislat/osha.asp> or contact Melissa Low, director, Industry Resources and Legislative Services, at melissa.low@cmma.org or (703) 739-9500. This article was written by club industry expert Alan Achatz, CCM, CHE, of AKA Capitol Adventures in conjunction with participants in the OSHA and CMAA Alliance. It does not necessarily reflect the official views of OSHA or the U.S. Department of Labor. ♦

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