

## Focus On ...

### Got an Extra \$1,000.00 to Throw Away?

By Alan E. Achatz, CCM, CHE



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Safety just isn't a sexy topic. You think you are doing a good job to provide a safe workplace and as long as no one is injured, it seems as if the job is getting done.

#### Allow Me to Pose a Bevy of Questions

Are you doing the required annual employee training for hazardous chemicals at your business? (This training is for all employees – including the office staff).

Do you know what Material Safety Data Sheets (MSDS) are? Do you have MSDS for all chemicals on site? Does each department have a MSDS book?

Do you know if any of the chemicals that you have might cause a violent reaction if mixed with another chemical on site? What reactions might occur? Perhaps a cloud of poisonous gas; a more intense fire; or maybe even an explosion?

Where are the various chemicals stored? Might incompatible items be stored next to/above/below one another?

Do employees wear the required personal protective equipment for the tasks they do?

#### Occupational Safety and Health Administration (OSHA) Regulations

For awareness purposes, here are highlights of federal OSHA regulations on hazardous communication. You are required by law to ensure that your employees know the hazards and identities of the chemicals they are exposed to when they are working; train employees prior to their using or being exposed to hazardous chemicals; and maintain a current database of chemicals used/stored at your operation. In the past, the only option was to have paper copies of all MSDS. Now, if computer/Internet access is available, you can maintain the forms electronically or even on-line.

It is important to note – regardless of how they are being maintained, the employees have to be able to access the MSDS immediately. Locked offices or locked filing cabinets are not considered accessible areas.

A table of contents should accompany each MSDS book (or electronic file) to facilitate promptly obtaining the MSDS. (If you are keeping a master copy, I also recommend breaking down each batch of MSDS by department.)

#### A Checklist For Compliance

Source: *Hazard Communication Guidelines for Compliance*, U.S. Department of Labor Occupational Safety and Health Administration (OSHA) Publication 3111  
<http://www.osha.gov/Publications/osh3111.pdf>

- Obtain a copy of the rule.
- Read and understand the requirements.
- Assign responsibility for tasks.
- Prepare an inventory of chemicals.
- Ensure containers are labeled.
- Obtain MSDS for each chemical.
- Prepare written program.
- Make MSDSs available to workers.
- Conduct training of workers.
- Establish procedures to maintain current program.
- Establish procedures to evaluate effectiveness.

#### Personal Protective Equipment

When it comes to safety, if I can only have you/your employees do one thing, it would be to wear eye protection.

Those who wear corrective eyewear will tell you that

items do 'bounce off their glasses and they never think about it.

The Prevent Blindness America organization states that 90% of job-related eye injuries can be prevented. This means that the employees cleaning the toilets; washing windows; spraying the tables with disinfectant/wax/cleaning solvent; using the backpack blower ... need to wear safety glasses. And this means covering their eyes, not on the crowns of their heads. Of course, there are other types of personal protective equipment that should be worn but you have to start somewhere, and I strongly recommend you start with safety glasses.

#### So, Do You Have An Extra \$1,000.00?

The title of this article evolved from a club being cited by OSHA for not having a written Hazard Communication Policy and getting a hefty fine as a result. Now that you know it has happened to others, you have to ask the question: Should I spend a portion of the \$1,000.00, buy a policy and train the employees? Or should I do nothing and hope that nothing happens to the staff? It's your call.

*Alan E. Achatz, CCM, CHE, is a former club manager who now assists clubs, CMAA chapters and other organizations with safety education programs and OSHA policy development. (Do note that as a PCS subscriber, you are entitled to a 20 percent discount on services through December 2007.) He is an instructor of the NRA Education Foundation ServSafe® Essentials course and additionally an OSHA and CMAA Alliance Implementation Team member. Alan may be reached at 716-565-9122 or at [akaachatz@msn.com](mailto:akaachatz@msn.com)*



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