

OSHA Readiness for the Private Club

By Alan E. Achatz, CCM, CHE

What do you have to know to be a club manager? First, you have to be adept at human relations with the members and the employees, both orally and written. Equally important is your knowledge of every aspect of the industry: reading and interpreting financial statements; food & beverage menu development and mark-up percentages; budgeting; marketing; the insurance bidding process; renovations and interpreting blueprints; wage and hour laws; unemployment hearings; lawsuits; and innumerable other facets. The list can go on and on to encompass variables specific to your operation from types of grasses to how the flags are flown at a yacht club or to the art collection...

Of course, the school of hard knocks or years of experience aid in developing all these skills. Another great teacher is other people's experiences, although this is probably the hardest way to learn since all their knowledge is rarely fully imparted.

OSHA and Private Clubs

Over the past six years, I have presented OSHA education sessions to numerous

CMAA chapters. One question that I am repeatedly asked during these presentations is, "Why hasn't anyone told me what I should be doing to comply with OSHA?" I can only make the analogy that this is like calling the IRS to say you have a problem! Nowadays, OSHA is much more user-friendly, and its Web site (www.osha.gov) can provide many answers to your questions.

Voluntary Protection Program

There is also a free consultation program called the Voluntary Protection Program or VPP. The VPP will allow you to have a representative of OSHA tour any portion (or all) of your facility and inform you as to what changes are required for compliance with OSHA standards. No fines will be assessed for non-compliance.

There is a potential catch; you must mitigate any item(s) within a specified time frame. If you don't, it is possible that you will be turned in to OSHA and then be subject to fines.

What do you, as a club manager, need to know to comply with OSHA?

The OSHA standard is applicable to allclubs.

The likelihood that OSHA will visit you is based on the following criteria and its inspection priorities are:

1. Imminent danger;
2. Catastrophes, fatalities and accidents;
3. Employee complaints; and
4. Programmed inspections and follow-up.

Another important item to know is you are required to call the local OSHA office **within eight hours** if you have an employee fatality or an incident that requires the hospitalization of three or more employees.

THE FIRST REQUEST

If OSHA visits your club, its first request will be to view your OSHA 200 log and 300, 300A and 301 logs. (The OSHA 200 and 300 logs are a compilation of your injuries and illnesses that have occurred throughout the year.) The OSHA 300A form with the prior year's information is to be posted annually between February 1 and April 30 on the staff bulletin board. Please be aware that you may have multiple locations where this summary must be posted. Only 10 percent of the clubs I have toured have posted their logs on an annual basis!

OSHA Readiness

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HEALTH & SAFETY POLICIES

OSHA's next request will be to review all your health and safety policies and your training records. The policies denoted with an * require annual employee training.

Do you have the following policies?

- Blood-Borne Pathogen Policy *
- Emergency Action Plan*
- Hazard Communication Standard with MSDS training module *
- Hearing Conservation Standard (if required)
- Lockout/Tagout Standard *
- Permit Required Confined Space Policy (if required)
- Personal Protective Equipment
- Revised Respiratory Standard * (if required)

Other policies (forklift, dive operations, etc.) may apply depending on your operation, practices and your state's requirements.

What about annual fire extinguisher training?

When I was managing clubs, I thought it was a great idea to have the fire department visit on an annual basis to train the staff on how to use fire extinguishers – I had no idea of the following OSHA requirement!

OSHA Standard 29 CFR 1910.157 "Portable Fire Extinguishers (g) Training and Education (1) Where the employer has provided portable fire extinguishers for employee use in the workplace, the employer shall also provide an education program to familiarize employees with the general principles of fire extinguisher use and the hazards involved with the incipient stage of fire fighting; (2) The employer shall provide the education required in paragraph (g)(1) of this section upon initial employment and at least annually thereafter."

THE SITE TOUR

In the past six years that I have been an Authorized Trainer of OSHA's Outreach Program, I have conducted nearly 90 simulated OSHA site tours in the club environment. When the time comes to tour a facility, I personally always enjoy the company of the

manager. It seems we either come across a great employee hiding place or see something we've never seen before that causes us to shake our heads and profess, "What were they thinking when they...?"

The remainder of this article will list the most common violations I have noticed on city club tours by department.

CLUBHOUSE (The items may also have been noted in other departments.)

- No guard rails on receiving dock.
- Doorways cluttered with boxes or egress compromised.
- Fire extinguishers out of date or lacking tag.
- First-aid kits not stocked.
- Circuits on electric panels not marked (or spares in the ON position).
- Exposed circuit breakers inside the panel – blank cover plates needed.
- Hazardous chemicals (oxidizers, flammables and corrosives) stored in close proximity to one another.
- Proper personal protective equipment not available for the staff (or the staff is not trained in its use).
- Eyewash/shower stations needed in laundry areas.
- CO2 tanks not chained to the wall.
- MSDS books do not have a table of contents.
- One plug strip is plugged into another because there are not enough outlets! (A definite fire hazard!)
- Unlabeled chemical containers.
- Workstations are not ergonomically correct. (Not a major concern now, but may be in the future!)

- Kitchen floors are wet and slippery.
- High voltage signage needed in mechanical areas.
- Roof, attic and pool access areas may require Permit Confined Space Policies.
- Electrical boxes missing covers
- Wiring not to code.

Over the years, I have encountered some situations that OSHA would consider "Immediate Dangerous to Life and Health (IDLH)." These violations can shut your business down! There have even been times when I have walked out of an area because I was concerned for my own safety!

WHERE DOES ONE START?

What should you do to ensure you are ready for OSHA? Review your health and safety policies and compare them against the list at the beginning of this article and ensure you are doing the required annual employee training. Another good idea is to tour your entire facility from the basement to the roof and from the front curb to the back of the property.

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The ACUC website has taken on a new look and with enhanced features, clubs are asked to showcase your amenities by building a Club Profile. Members were recently sent a membership number that will allow your club to register online. Using your membership number, register for a user name and password to log onto <http://www.acuclubs.org/ClubProfile.asp> to start adding your club features today.

Unsure of your membership number?

Contact ACUC at acuc@acuclubs.org today for further information.