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OSHA Violations at Clubs

by Alan E. Achatz, CCM, CHE

Through my business efforts, I attempt to help clubs comply with Occupational Safety & Health Administration (OSHA) regulations while concurrently helping to keep their employees safe.

Whenever discussing safety with any operation, initial efforts are extended to review the injury/illness records for the past five years – sometimes we use the OSHA 300 logs, other times the worker's compensation loss runs. This injury/illness review allows us to see if any patterns are evident.

The purpose of this article is to increase safety awareness for CMAA members by sharing what has happened at other clubs. The charts included with this article list the OSHA data for clubs that have had OSHA visits.

Golf Course and Country Clubs

The Golf Course and Country Club data states that OSHA inspected 16 different clubs and issued 53 citations with almost \$80,000 in fines levied. The eight digit numbers used in the first column enumerates the citations. The 1910 prefix signifies the club was cited under the General Industry standards; the 1926 prefix is for construction projects; and the 1904 prefix used for record keeping requirements.

The OSHA Act General Duty Clause citation means that the employer was cited for not providing employment and a place of employment which are free from recognized hazards that are causing or are likely to cause death or serious physical harm to his employees

The numbers with a suffix with .(number follows) represent additional requirements. Do know that there are numerous other sub categories that include numbers and letters in the parentheses. Specific information regarding these citations is not available unless the various numbers/letters are included. (An example of this limited data is listed below in the First Aid comments.)

Over the years, I have become very familiar with some of these violations at clubs.

Abrasive wheel grinders .215

This citation continues to be one of the most cited (and financially penalized) for golf/country clubs. Most times the machine guards on the bench grinders have been removed, other concerns involve the bench rest not being properly adjusted/the wheel being damaged or excessively worn.

Hazard Communication .1200

As the employer, it is your responsibility to train your employees on the hazardous chemicals in your operation as well as have a written policy. There are new training requirements that went into effective on 12/1/13 involving Safety Data Sheets.

Personal protective equipment .132, .133, .134, & .135

Some rather impressive fines are being levied for not providing/ensuring the employees are wearing their gloves, glasses, respirators and head protection.

Recordkeeping 1904.

Are you maintaining your OSHA 300 & 300A logs? Do you have copies for the past five years? A trends analysis for the past five years will also help to determine if the same events are occurring.

Construction standards 1926.

If you are doing a construction project you can be cited for the contractor's

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employee injuries and/or their negligence!

First aid .151

Unless the (a), (b), (c) letters are listed, one does not know if the operations was cited for not having the proper first aid supplies; not having staff trained to provide adequate first aid, not being able to provide first aid response within three to four minutes, or not having an eyewash/shower drench station within close proximity to hazardous chemicals.

Fire extinguishers .157

Again, numerous concerns evolve depending on the citation; are your employees trained on how to use fire extinguishers? Are extinguishers available?

Blood Borne Pathogens .1030

Do you have a written policy? Do you train your staff on how to clean up bodily fluids?

Wiring methods 304,305

Electrical Safety-related work practices shall be employed to prevent electric shock or other injuries resulting from either direct or indirect electrical contacts, when work is performed near or on equipment or circuits which are or may be energized. The specific safety-related work practices shall be consistent with the nature and extent of the associated electrical hazards. 333

Athletic, City and University Clubs

Athletic, City and University Clubs have significant less citations, yet this does not mean that there are not numerous safety concerns and employee injuries. Currently, there are exemptions for recordkeeping requirements and it must be noted that OSHA is reviewing these requirements.

Yacht Clubs, Home/Property Owners Associations, Gun Clubs and others

The North American Industry Classification System (NAICS) has now separated Yacht Clubs and numerous other types of membership groups from the golf and country club sectors. This newer classification is showing significant fines and wide ranging safety concerns. If you are at a different type of membership club (or know a manager at an atypical club), I would ask you to review/share this information and then determine what concerns you may have.

Closing thoughts

Knowing what OSHA has cited other clubs for does not mean that these same concerns are applicable at your operation. However, knowledge of what OSHA is looking for and looking at can raise your awareness and allow you to prepare for potential events discover through the safety mistakes of others.

[Alan E. Achatz](#), CCM, CHE is a former club manager who assists clubs with safety issues including emergency action planning and implementation, crisis management, OSHA compliance and behind-the-scenes safety audits. Alan has written extensively about safety concerns for clubs. He may be reached at 716-565-9122 or at www.clubssafety.com.

Frequently Cited OSHA Standards

NAICS Code: 813410 Civic and Social Organizations (Includes Athletic, City & University Clubs)

Listed below are the standards which were cited by **Federal OSHA** for the specified NAICS Code during the period October 2012 through September 2013. Penalties shown reflect current rather than initial amounts. For more information, see [definitions](#).

Standard	Citations	Inspections	Penalty	Description
Total	4	3	\$3,945	All Standards cited for Civic and Social Organizations
1910023	1	1	\$2,160	Guarding floor and wall openings and holes.
1910037	1	1	\$0	Maintenance, safeguards, and operational features for exit routes.
19100303	1	1	\$1,785	General requirements.
19261101	1	1	\$0	Asbestos

Frequently Cited OSHA Standards

NAICS Code: 713910 Golf Courses and Country Clubs

Listed below are the standards which were cited by **Federal OSHA** for the

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specified NAICS Code during the period October 2012 through September 2013. Penalties shown reflect current rather than initial amounts. For more information, see [definitions](#).

Standard	Citations	Inspections	Penalty	Description
Total	53	16	\$79,470	All Standards cited for Golf Courses and Country Clubs
19100215	7	3	\$4,660	Abrasive wheel machinery.
19101200	4	4	\$1,000	Hazard Communication.
OSH ACT	4	4	\$11,130	--- No Description Found ---
19100132	3	3	\$11,830	General requirements.
19100134	3	2	\$3,000	Respiratory Protection.
19100157	3	3	\$2,000	Portable fire extinguishers.
19040001	2	2	\$500	Partial exemption for employers with 10 or fewer employees.
19040004	2	2	\$1,140	Recording criteria.
19040039	2	2	\$3,450	--- No Description Found ---
19100304	2	2	\$4,000	Wiring design and protection.
19100305	2	2	\$1,800	Wiring methods, components, and equipment for general use.
19260651	2	1	\$4,900	Specific Excavation Requirements.
19040040	1	1	\$0	--- No Description Found ---
19100036	1	1	\$1,350	Design and construction requirements for exit routes.
19100106	1	1	\$890	Flammable and combustible liquids.
19100133	1	1	\$0	Eye and face protection.
19100135	1	1	\$4,200	Head protection.
19100151	1	1	\$1,190	Medical services and first aid.
19100176	1	1	\$1,190	Handling materials - general.
19100219	1	1	\$0	Mechanical power-transmission apparatus.
19100252	1	1	\$3,430	General requirements.
19100303	1	1	\$2,100	General requirements.
19100332	1	1	\$2,205	Training
19100333	1	1	\$2,205	Selection and use of work practices
19101030	1	1	\$0	Bloodborne pathogens.
19260416	1	1	\$4,900	General requirements.
19260417	1	1	\$4,900	Lockout and tagging of circuits.
19260501	1	1	\$1,500	Duty to have fall protection.
19260652	1	1	\$0	Requirements for protective systems.

NAICS Code: 713990 All Other Amusement and Recreation Industries (includes Yacht Clubs, Home & Property Owners Associations, and other membership groups)

Listed below are the standards which were cited by **Federal OSHA** for the specified NAICS Code during the period October 2012 through September 2013. Penalties shown reflect current rather than initial amounts. For more information, see [definitions](#).

Standard	Citations	Inspections	Penalty	Description
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Total	141	24	\$136,190	All Standards cited for All Other Amusement and Recreation Industries
19101025	52	14	\$52,215	Lead.
19100134	28	10	\$18,820	Respiratory Protection.
19101200	14	9	\$8,220	Hazard Communication.
19100132	8	5	\$4,740	General requirements.
19100107	7	1	\$4,200	Spray finishing using flammable and combustible materials.
19100023	6	5	\$12,350	Guarding floor and wall openings and holes.
19100212	3	2	\$3,678	General requirements for all machines.
19100095	2	2	\$6,250	Occupational noise exposure.
19100106	2	1	\$893	Flammable and combustible liquids.
19100305	2	2	\$893	Wiring methods, components, and equipment for general use.
19260453	2	2	\$2,800	Aerial lifts.
19040029	1	1	\$540	Forms.
19040039	1	1	\$2,000	--- No Description Found ---
19100022	1	1	\$1,500	General requirements.
19100024	1	1	\$2,700	Fixed industrial stairs.
19100036	1	1	\$1,400	Design and construction requirements for exit routes.
19100067	1	1	\$1,200	Vehicle-mounted elevating and rotating work platforms.
19100133	1	1	\$0	Eye and face protection.
19100136	1	1	\$0	Occupational foot protection.
19100138	1	1	\$0	Hand Protection.
19100147	1	1	\$3,500	The control of hazardous energy (lockout/tagout).
19100157	1	1	\$0	Portable fire extinguishers.
19100215	1	1	\$893	Abrasive wheel machinery.
19100242	1	1	\$1,000	Hand and portable powered tools and equipment, general.
19100304	1	1	\$1,500	Wiring design and protection.
5A0001	1	1	\$4,900	OSH Act General Duty Paragraph

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