

OSHA Readiness: How does your club compare to others?

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The mention that OSHA is at the door instills a twinge of fear into every employer's belly. Do you know what the Occupational Safety and Health Administration representative wants to see if he/she walks in your door?

In the past 3 years that I have been a Trainer of General Industry Standards for OSHA's Outreach Program, I have conducted nearly 40 simulated OSHA site tours in the club environment.

This article will share the commonality of non-compliance items noted throughout all of the clubs visited.

THE FIRST REQUEST

If OSHA visits your operation, their first request will be to view your OSHA 200 log. (The OSHA 200 log is a compilation of your injuries and illnesses that have occurred throughout the year.) The OSHA 200 log with the prior year's listings is to be posted annually between February 1 and March 1 on the staff bulletin board. Please be aware that you may have multiple locations where this log must be posted. Only 10% of the clubs toured (from my small study) have posted their logs on an annual basis!

HEALTH & SAFETY POLICIES

Their next request will be to review all your health and safety policies and also your training records.

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)

Do you do annual employee training in all the above policies denoted with an *?

Other policies may apply depending on your operation, practices and your state's requirements.

What about annual fire extinguisher training?

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."

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

THE SITE TOUR

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...?"

Following are the most common violations noticed on club tours by department.

CLUBHOUSE (The items noted here may have also 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 near 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.

PRO SHOP

No MSDS books in 95% of operations!

Open containers with flammables.

GROUND / CART AREAS / TENNIS / POOL

Employees observed not using personal protective equipment (eyewear, earplugs, respirators, apparel...)

High voltage signage missing on buildings.

National Fire Protection Association regulatory 4-color signage missing for gas, pesticide and other storage areas.

Eyewash / shower stations needed.

Store flammables in approved metal flameproof cabinets.

Outdoor lighting/wiring missing protective covers and/or GFCI Ground Fault Circuit Interrupter.

Work areas may require yellow tape to designate walkways.

Missing machine guards on grinders and other equipment.

The examples listed were those that were observed in more than one club. Numerous other violations existed, yet if each incident were shared this article would be voluminous.

Over the recent years I have encountered some situations that OSHA would consider Immediate Dangerous to Life and Health (IDLH). These are violations that can have your business shut down! There was even one time where I walked out of the area being inspected because I was concerned for my own safety.

WHERE TO START?

What should you do starting today 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 also ensure you are doing the required annual employee training. Another good idea is to take a tour of your entire facility from the basement to the roof and from the front curb to the back of the property.