

Hearing Conservation Program

Prepared by: Allied Insurance Brokers, Inc.

Commonwealth Scaffold, LLC

Effective Date: 12/14/2012

Location:

Revision Number: 1

TABLE OF CONTENTS

| | |
|---|----|
| 1. Hearing Conservation Program..... | 1 |
| 2. Presentation Handout..... | 6 |
| 3. Presentation Instructor’s Notes..... | 7 |
| 4. Presentation Quiz..... | 9 |
| 5. Presentation Sign-in Log..... | 10 |

Prepared By:

Date:

Approved By:

Date:

This policy is merely a guideline. It is not meant to be exhaustive nor be construed as legal advice. It does not address all potential compliance issues with Federal, State, local OSHA or any other regulatory agency standards. Consult your licensed Commercial Property and Casualty representative at Allied Insurance Brokers, Inc. or legal counsel to address possible compliance requirements.

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Reference Standard

Occupational Safety and Health Administration, Subpart G:
29 CFR 1910. 95, Occupational Noise Exposure

Purpose

This procedure establishes minimum requirements to evaluate noise exposure in the facility and to protect personnel from noise induced hearing loss.

Scope

This procedure applies to all of our company employees, all contractors and vendors performing work on company property, and all other individuals who are visiting or have business with our company.

Responsibilities

Management is responsible for development and review of this program. Management is also responsible for appropriate employee training.

Management and supervisors are responsible for enforcement of this program.

Employees shall comply with all procedures outlined in this policy.

Contractors and vendors shall comply with all procedures outlined in this policy.

Definitions

Action Level: The action level for noise exposure is: 85 dBA for an 8 hour Time Weighted Average (TWA)

Audiogram: A screening test to determine hearing acuity through administration of air conduction tones transmitted through head phones.

Baseline Audiogram: The initial audiogram taken upon hire or assignment to a noisy area.

Contractor: A non-company employee being paid to perform work in our facility.

Decibel: Abbreviated dB-a measure of sound pressure or loudness. For purposes of OSHA compliance noise is measured in dBA (decibels on the A scale, Slow response)

Dosimeter: An electronic device that converts sound pressure into an electronic signal that is stored for future evaluation. All continuous, intermittent and impulse sound between 80 and 130 decibels will be integrated into the readings.

Noise: Unwanted sound.

Sound Level Meter (SLM): An SLM is a device that is capable of giving a direct, instantaneous reading of the sound pressure or loudness. The SLM can also record the highest impulse noise that has occurred. The SLM has three scales: A, B and C, and a Fast and Slow Response capability.

Standard Threshold Shift: A permanent change in hearing (worsening) found when comparing an annual audiogram with a baseline audiogram.

Vendor: A non-company employee being paid to perform a service in our facility.

Procedure

Noise Exposure

Whenever feasible, noise exposure exceeding that listed below will be controlled by engineering or administrative means. When it is impractical to use engineering or administrative controls a hearing conservation program will be implemented.

| <u>Duration per day, Hours</u> | <u>Sound Level (dBA, slow response)</u> |
|--------------------------------|---|
| 8 | 90 |
| 6 | 92 |
| 4 | 95 |
| 3 | 97 |
| 2 | 100 |
| 1.5 | 102 |
| 1 | 105 |
| .5 | 110 |
| .25 (or less) | 115 |

Monitoring

Whenever information indicates that noise exposure may be at or above 85 dBA, in an area or department monitoring will be performed utilizing either a Sound Level Meter or a Dosimeter.

All instruments used for noise monitoring will be calibrated before and after use and a record maintained of the calibrations and readings derived through monitoring.

Whenever readings are taken for OSHA compliance purposes the meter or dosimeter will be set to the A scale, Slow response.

Monitoring will be repeated whenever a change in production, process, equipment or controls increases, or could increase exposure.

Employees (or their representatives) will be allowed to observe monitoring. Employees who have an 8 hour TWA of 85 dBA or greater will be notified of the results of the monitoring in writing.

Hearing Conservation Program

All employees who are exposed to noise level of 85dBA or greater 8 hour TWA, will be required to participate in the hearing conservation program. This program will consist of:

- Audiometric testing
- Mandatory hearing protection*
- Training

* Our facility has decided to mandate the use of hearing protection at 85dB rather than the OSHA requirement of 90dB

Areas in our facility that are in the Hearing Conservation Program include:

(LIST AREAS IN YOUR FACILITY) _____.

Audiometric Testing

Audiograms will contain the following information or the information will be readily accessible and linked to the audiogram:

- Name and job classification of the individual

- Date of the audiogram
- The examiner's name
- Date of the last acoustical or exhaustive calibration of the audiometer
- Employee's most recent noise exposure assessment
- The background sound pressure levels in the audiometric test room/booth

Baseline Audiogram:

- A baseline audiogram will be obtained as soon as possible, within the first six months after employment or assignment to an area with noise exposure at or above a Time Weighted Average of 85 dBA. If a mobile test van is used, the baseline audiogram will be completed within one year of employment or initial assignment to a noise exposure area.
- At least 14 hours without workplace exposure will precede the baseline audiogram. Hearing protectors can be required to be used as a substitute for 14 hours without exposure. Employees will also be notified to stay away from significant non-occupational noise for 14 hours.

Annual Audiograms

- Annual audiograms will be provided for all employees who are exposed to noise at or above a Time Weighted Average of 85 dBA.

Standard Threshold Shift (STS)

- The annual audiogram will be compared to the baseline audiogram to determine if a standard threshold shift has occurred. A standard threshold shift is defined as a change in hearing threshold of an average of 10 dB at 2000, 3000 or 4000 Hz in either ear.
- If an STS is determined a retest will be conducted within 30 days. The retest results can then be used as the annual audiogram.
- Any audiogram showing an STS will be referred to audiologist, otolaryngologist or physician for evaluation.
- If an STS occurs the following will be done:
 - The employee will be notified in writing within 21 days of the determination
 - The employee will be refitted and retrained in the use of hearing protection
 - The medical opinion of the evaluating practitioner will be followed and/or communicated to the employee regarding the need for follow-up medical evaluation either for occupational or non-occupational reasons. Communication with the employee will be in writing
 - Age correction will be taken into account as permitted by OSHA. See Appendix F of 29 CFR 1910.95, Occupational Noise Exposure
 - When the audiologist, otolaryngologist, or physician determines that an STS has occurred, the revised audiogram will be used as the new baseline
 - The STS will be recorded on the OSHA 300 Log if:
 - Hearing level is 25 dB or greater from audiometric zero at any test point
 - An STS of 10 dB or greater is identified
 - A medical professional says the hearing loss is work related

Medical Management

All audiometric testing will be conducted by individuals who are certified by the Council of Accreditation in Occupational Hearing Conservation. Technicians will report to an audiologist, otolaryngologist or physician who will advise management regarding program administration, employee audiometric health and other matters pertaining to the Hearing Conservation Program. Our Medical Manager will ensure that all audiometric testing requirements are met.

Hearing Protectors

All employees with a noise exposure at or above a Time Weighted Average of 85 dBA will wear company provided hearing protectors for their entire shift while in areas with noise exposure at or above 85 dBA.

Hearing protection will provide the greatest attenuation possible and in no case allow greater than 80dBA calculated exposure.

We will provide a choice of at least two suitable hearing protectors.

If noise exposure increases, we will re-evaluate all hearing protection to ensure adequate protection.

The following formula will be used to determine the efficiency of hearing protection:

- Subtract 7dB from the NRR of the hearing protector
- Subtract the modified NRR (determined in the step above) from the 8 hour TWA for the employee exposure as determined through monitoring

Training Program and Access to Information

All employees exposed to noise at or above the time weighted average of 85 dBA will receive training as outlined below. Content of the training will be:

- Areas with noise exposure
- Facility rules requiring use of hearing protection
- The effects of noise on hearing
- The purpose of hearing protectors including: advantages, disadvantages, attenuation, and fitting and care instructions for each available type
- The purpose for and explanation of the procedure for audiometric testing

Training will be provided at time of hire or assignment into an area with noise exposure at or greater than 85 dBA, and repeated annually thereafter.

A copy of 29 CFR 1910.95, Occupational Noise exposure will be available to employees from the program administrator. *Additionally*, as required in 29 CFR 1910.95(l)(1), a copy of this standard has been posted: **(LOCATION POSTED IN YOUR FACILITY)** _____.

Any additional materials supplied by OSHA to this facility pertaining to Hearing Conservation will also be made available to employees.

All employees and their representatives have access to the OSHA standard and any other government provided information regarding hearing conservation, our facility hearing conservation program, and their individual audiometric test record. Additionally, the program administrator will provide assistance with understanding this information.

Recordkeeping

All monitoring data, personal and area sampling and SLM readings, will be evaluated for permanent records retention due to the value in determining workers' compensation compensability of hearing loss. In no case will such data be retained less than two years.

Audiometric testing records will be retained for at least the duration of employment and will be evaluated for permanent records retention due to the value in determining worker's compensation compensability of hearing loss.

Revision History Record:

| Revision Number | Section | Revised By | Description |
|-----------------|---------|------------|--------------------|
| 0 | NA | NA | Original document. |
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Important Things For You to Remember...



PROTECTING YOUR HEARING

- ✓ Wear hearing protection when and where it is required at work
- ✓ Follow manufacturer's instructions for use
- ✓ Use hearing protection at home

NOISE

- Unwanted sound
- At or above **85dBA** can cause noise-induced hearing loss
- Home and work EXPOSURE

HEARING LOSS SIGNS

- Conversation muffled
- Increasing TV volume
- Asking others to speak up

STANDARD THRESHOLD SHIFT

- STS, for short
- Is an insidious process (sneaks up on you)
- Signals noise-induced hearing loss
- Usually permanent, can't be fixed with medical procedures or hearing aids

HEARING CONSERVATION PROGRAM

- You will receive an annual audiogram
- You will receive annual training
- You must wear hearing protection
- You have access to the OSHA standard

HEARING CONSERVATION PROGRAM PRESENTATION - INSTRUCTOR NOTES

The following provides a useful preparation outline for use by trainers presenting the Hearing Conservation Program training presentation to employees.

Training Objectives

Train the student regarding the insidious nature of hearing loss and the need to take responsibility for wearing hearing protection properly and when required

Before Training

- Read the OSHA standard and the model Hearing Conservation program
- Understand the following:
 - That this program is written to require the use of hearing protection at exposures at or above 85 dBA. This is done because current research indicates that a significant number of people suffer permanent hearing loss between 85 dB and 90 dB, where OSHA mandates hearing protection. This is an industry best practice and could help protect your facility against workers' compensation litigation.
 - This procedure encourages you to keep exposure monitoring and audiometric test data as permanent records. Again, this is not required by OSHA, but could help defend you in worker's comp litigation.
- Complete the blank sections in the written program:
 - Hearing Conservation Program—list areas in your facility that are included in the Hearing Conservation Program.
 - Training Program and Access to Information—OSHA requires you to post a copy of the 29 CFR 1910.95 in your facility. Choose a location (lunch/break room, outside a supervisor's office, bulletin board, etc.) and note this location in the written program.
- Bring samples of hearing protection to the training and arrange to fit students for their PPE and demonstrate proper use and discuss replacement, care and storage of this PPE.
- Many facilities install signs in areas where hearing protection is required. While not required by OSHA, this is an excellent practice.

Introduction for Training

- Begin by stressing the overall importance of safety in your facility
- Review areas included in the Hearing Conservation Program
- The following list can help you explain the concept of how loud 85 dBA is:
 - Normal conversation/office: 60 decibels
 - Busy traffic: 75 decibels
 - Woodshop noise: 100 decibels
 - Chainsaw: 110 decibels
- Review the fact that noise exposure occurs outside of work too, and can be just as damaging to the student's hearing. Noise exposure can include: working with electric tools and small engines, auto repair, shooting, loud music exposure, etc. Hearing protection should be worn at home and at work to be effective,
- As a ground breaker, you can ask employees if they have ever used hearing protection (plugs, muffs) in past jobs or as part of hobbies

General Guidelines

- Stress the importance of the bullet points on these slides
- Stress the importance of the individual employee being committed to his/her own safety and to wearing hearing protection at all times required
- Be sure to be open to questions or comments

Training Notes

- Review the location(s) of PPE
- Review and demonstrate cleaning and sanitation procedure with students
- Discuss the points listed on the slide

Conclusion

- Review the important points listed on the "Conclusion" slide

Student Exercise

At the conclusion of the training, the following will demonstrate the employees' understanding of the topic:

1. Ask the employee to identify areas in your facility that are in the Hearing Conservation Program.
2. Ask the employee to explain key points of the procedure.
3. Ask the student to demonstrate how to use the hearing protection in your presence.

Name: _____ Date: _____ Score: _____

Place a check mark on the line with the best answer for these 10 questions:

1. When we lose hearing due to noise exposure it is called "Noise Induced Hearing Loss":
a. ___ True
b. ___ False
2. Noise induced hearing loss is:
a. ___ Easily treated or repaired with medical treatment
b. ___ Almost impossible to treat or repair
3. Hearing protection is required in our facility when noise exposure is at or greater than:
a. ___ 1000 decibels
b. ___ 85 decibels
4. A hearing test is called an audiogram:
a. ___ True
b. ___ False
5. Hearing loss from noise exposure is often called:
a. ___ Characteristic
b. ___ Insidious (it "sneaks up" on you)
6. Signs of noise induced hearing loss include difficulty with conversations and turning up the TV/radio:
a. ___ True
b. ___ False
7. You can only prevent noise induced hearing loss by using:
a. ___ Safety shoes
b. ___ Hearing protection.
8. Hearing protection must be worn:
a. ___ Only at work
b. ___ At work **and** at home when you are exposed to noise
9. You are allowed to review the OSHA standard for hearing conservation:
a. ___ True
b. ___ False
10. You will receive an audiogram:
a. ___ Whenever there is time in the schedule
b. ___ Annually

