Purpose, Objective, Scope

- **Purpose:** The purpose is to establish a program that identifies work areas where noise exposure occurs taking proactive measures to prevent hearing loss from occurring among affected employees. The second purpose is to comply with 29 CFR 1910.95 Hearing Conservation Standard.
- **Objective:** The objective is to implement a Hearing Conservation Program based on the levels of noise exposure to prevent employee hearing loss.
- **Scope:** This program covers all employees and work areas within the Production area that are exposed to 85 dBA TWA or greater.

Overview

- The Company will administer an effective Hearing Conservation Program whenever our employees may equal or exceed exposure of 85 dBA and/or, at our discretion, those noise levels that fall between 80 dBA through 85 dBA over an 8-hour time-weighted average. The Hearing Conservation Program is required in identified areas where production activities are performed.
- The Company implemented a sampling strategy to identify employees for inclusion in our Hearing Conservation Program. Dosimeter testing will be conducted every two to three years or as process changes dictate. The Company will supply the proper selection of hearing protectors. Noise level variance occurs within the Shop depending on what is being worked.
- This program meets or exceeds the requirements of 29 CFR Part 1910.95.

Program Requirements

- **Noise Monitoring**
  - The noise in the production area is fairly consistent in each department. However, production demands and processes may have an effect. The company has instituted a Hearing Conservation Program. The production areas tested include fabrication room with CNC Machines, fabrication room with CNC machines and brief hammer use, room with welding area and spray booth. Noise monitoring will incorporate a monitoring strategy that represents the noise employees are exposed to during production. Noise monitoring will be repeated whenever a change in production, process, equipment, or controls, changes the noise exposure, particularly when additional employees may be exposed at or above the action level of 85 dBA. Employees whose areas exceed the 85 dBA over an eight-hour period will be notified of the monitoring results**.**
- **Audiograms**
  - The Company will provide hearing audiograms to production employees or other employees exposed to 85 dBA over an eight hour time period. Audiograms will be performed by one of the following professionals provided by an outside testing agency: a physician or a technician who is certified by the Council of Accreditation in Occupational Hearing Conservation or has demonstrated competence in administering audiometric examinations.

- Employees will be given a baseline audiogram within 6 months of employment when working in those areas determined by the Company to require audiograms. The Company utilizes Sanford Occmed for initial or baseline testing of new employees. This may exceed the 6 months but will occur within one year of employment. The company does not have their own hearing test capability.
- The employee will be instructed to stay away from workplace type noise 14 hours prior to audiogram testing. This can be accomplished by avoiding noise during time away from work, or by utilizing hearing protectors in the workplace. The Company will notify employees when the hearing test will take place, enabling the employee to avoid workplace type of noise.
- The Company will test the hearing threshold in each ear with test frequency including a minimum of 500, 1000, 2000, 3000, 4000, 6000 Hz and others upon the discretion of the company.

- **Standard Threshold Shift (STS)**
  - A threshold shift is a change in hearing threshold relative to the baseline audiogram of an average of 10 dBA or more at 2000, 3000, and 4000 Hz in either ear or both relative to the most recent audiogram. Where this is the employee's first STS the comparison is made to the original baseline. If the employee had a previous experienced recordable hearing loss, compare the employee's current audiogram with the employee's revised baseline audiogram (the audiogram reflecting the employee's previous recordable hearing loss case).
  - Recordable STS is to be entered on the OSHA 300 Log.
  - Annual audiograms will be offered to employees. The new audiograms will be compared to the baseline audiogram (the initial test) to determine if a threshold shift has occurred to the ear. If a standard threshold shift occurs, a retest will be given to verify the shift. The firm that performs the audiogram test will check background noise measurements, previous audiograms, and testing equipment.
    - If a threshold shift is verified, due to workplace noise, the Company will fit the employee with hearing protectors, train them in their use and care, and require the employee to wear them.
    - If the employee has been previously fitted, that person will be refitted and retrained in the use of hearing protection and be given hearing protectors (if possible) with better attenuation.
    - The Company or the audiometric firm will notify the employee if additional testing is necessary or if the Company suspects that a medical pathology of the ear is caused or aggravated by the wearing of hearing protectors.
    - Employees must be notified of their STS within 21 calendar days from the date that the determination is made that their audiometric test showed the STS.
- **Controls**
  - When employees are exposed to noise levels outlined in the below Permissible Noise Exposure Table, the Company will utilize administrative or engineering controls.
  - If neither administrative controls nor engineering control the level of noise, hearing protection will be required as a method to control noise below the level of the following table.

Permissible Noise Exposure Table

Duration Per Day, Hours	Sound Level dBA Slow Response
8 hours	90
6 hours	92
4 hours	95
3 hours	97
2 hours	100
1 ½ hours	102
1 hour	105
½ hour	110

Hearing Protectors

- The Company will make hearing protectors available at 80 dBA and require that they be worn by employees exposed to an 8 hour time-weighted average of 85 dBA or at the lower discretionary level determined by the Company described above. Three options of hearing protection types will be made available to employees. These types include, but are not limited to, plugs, banded plugs, muffs, or any combination of these types. The hearing protectors will be provided and replaced at no cost to the employee when used at our Company. The Company will require wearing the protectors when:
    - Areas have been determined by the Company to need hearing protection,
    - Required by law,
    - Any employee has not yet had a baseline audiogram,
    - Employees have experienced a standard threshold shift.

Hearing Protection Selection

- Employees will be given the opportunity to select their hearing protection from a variety of suitable hearing protectors provided by the Company. Employees will be given training on the general care requirement of the protectors. Proper initial fitting is important. The correct use will be monitored by the Shift Foreman.
- The Company will utilize **Noise Reduction Rating (NRR) System** to determine the proper attenuation for hearing protection for the noise generated within the production facility. The NRR rating normally is on the manufacturer's literature or on the package. The hearing protection at a minimum will reduce employee noise exposure to 90 dBA (unless employee experienced a STS); however, the goal is to reduce employee noise exposure to 85 dBA in an 8-hour time-weighted average and lower to be consistent with the discretion of the Company previously noted above. The hearing protectors will be evaluated annually for effectiveness.
- The Company will evaluate hearing protectors by using the NRR method established by the National Institute of Occupational Health which describes in the "list of Personal Hearing Protectors and Attenuation Data: HEW Publication No. 76-120, 1975. A type II sound level dosimeter will be set at the "A" weighting network. The employee A-weighted TWA will be

established. Seven dB will be from the NRR, and subtract the remainder from the A-weighted TWA to obtain the estimated A-weighted TWA under the ear protector. The remaining total is the TWA based on the A-weighted scale.

Training

- The Company Hearing Conservation Training Program is workplace wide and will be provided annually. The program training will address the production noise exposure. In general, the program will include the following items.
  - Effects of noise on hearing
  - Purpose of hearing protection:
  - Advantages/disadvantages and attenuation of various hearing protection type selection
  - Fitting, use, and care
  - Purpose of Audiograms

Hearing Conservation Standard

- Upon request, the Company will provide a written copy of the OSHA standard on Hearing Conservation Standard, 29 CFR 1910.95.

Records

- The Company will retain records of noise monitoring performed, method used, and qualifications of the monitoring individual.
- Employee audiometric testing will be kept throughout the course of employment by the firm performing audiometric testing and by this Company. If the employee requests these records, the audiograms will be furnished to the employee. The Company has fifteen working days to provide these records. If records cannot be furnished in fifteen days, the Company will apprise the requesting employee of the reason for delay and approximate the time the record will be made available. The Company may consider copying cost for record duplication, but not overhead expense.
- If the Company ceases to do business; the Company will transfer these records to the successive employer.

Hearing Loss Required on OSHA 300 Log Entry

- See Standard Threshold Shift Section III(C)
- A work related hearing loss averaging 25 dB or more at 2000, 3000 and 4000 hertz in either ear is required to be entered onto the OSHA 300 Log. The employee's original baseline is used for the comparison. Correction for presbycusis (aging) can be used.

Responsibilities

- **Safety Manager**
  - Approves the Hearing Conservation Program.
  - Requires annual employee Hearing Conservation training.
  - Ensures budgetary allotments to support the Hearing Conservation Program.
  - Delegates to the Manager the day-to-day administrative coordination of the program.
  - Delegates the implementation of the program to the Manager.
  - Updates Hearing Conservation Program when needed.
  - Keeps abreast of regulatory changes.
  - Acts as a focal point for Hearing Conservation questions/issues
- **Business Coordinator**
  - Coordinates with the Safety Manager required annual Hearing Conservation training.
  - Coordinates with the Safety Manager required annual audiograms.

- Performs administrative duties of this program to satisfy the requirements of applicable company and federal safety regulations.
- Keeps all audiograms and reports on file for the length of employee employment.
- Ensures all STS are entered onto the OSHA 300 Log.
- Informs the Safety Manager with sufficient notice of hearing tests (audiogram).
- Custodian of the written program and training records.
- Schedules audiometric testing in coordination with the Safety Manager.
- Coordinates the day-to-day program activities with the Safety Manager.

- **Manager**
  - Overall implements the Hearing Conservation Program.
  - Establishes specific responsibilities and performance levels for the Employees.
  - Requires all employees attend Hearing Conservation training where applicable.
  - Understands the purpose and process of the Company's Hearing Conservation Program.
  - Enforces proper hearing protection usage.
  - Coordinates with the Safety Manager a selection of hearing protectors for employee use.
  - Understands the purpose and process of the Company's Hearing Conservation Program.
  - Enforces the use of hearing protection in required areas.
  - Conducts new employee orientation hearing conservation program.
  - Knowledgeable on the noise levels in the area supervised.
  - Releases employees to attend annual hearing conservation training.
  - Provide educational material to employees on Hearing Conservation upon request.
  - Arranges employee annual refresher training on Hearing Conservation Program in coordination with the Manager.
  - Evaluates noise areas for engineering noise controls with TWA of 90 dBA or greater.
  - Counsels employees having a (STS) about usage, refit the employee with hearing protectors, retrain them in their use and care, and reemphasize the company requirements use of hearing protectors, reevaluate the types of hearing protection provided and/or require new employees to wear them.
  - Notifies the employee if additional testing is necessary or if it is suspected that a medical pathology of the ear is caused or aggravated by the wearing of hearing protectors.
  - Requires the hearing protectors to have the appropriate NRR rating.
- **Employee**
  - Understands the purpose and process of the Company's Hearing Conservation Program.
  - Cooperates with personal noise testing which will consist of wearing a noise dosimeter.
  - Wears hearing protection as instructed in required areas.
  - Keeps hearing protection clean (some protectors can be washed).
  - Cooperates with the company in hearing tests (audiograms) to include avoiding loud noises (above 80 dBA) 14 hours prior to testing. This can be done by using earplugs, avoiding Ipod/ MP3 type of listening devices, etc.
  - Attends annual training.
  - Knowledgeable on what production areas require hearing protection.