

What Must I do about hearing Loss?

When a worker's annual hearing test shows a hearing shift from their baseline of an average of 10 decibels or more at the test frequencies of 2000, 3000, and 4000 hertz in either ear (after optional correction for aging), the law requires follow-up actions. This loss is called a standard threshold shift (STS).

Since there are things that could affect the outcome of a hearing test other than worker hearing ability (like variability within the test itself, background

noise in the test environment, a head cold or allergies during the test, and other factors), OSHA permits a re-test of the worker's hearing within 30 days of the annual test to confirm the STS. Workers with STS must be notified of the shift in writing within 21 days.

Work-related hearing loss is recordable on OSHA Form 200/300.

Recordability criteria have changed since the development of the Hearing Conservation Amendment; consult with OSHA or your supervising professional for more details.

All workers who have persistent STS must be:

- refitted with hearing protection (see NHCA Practical Guide #2: Fitting Hearing Protection for fitting tips);
- retrained about noise, hearing, and hearing protection; and
- be required to wear hearing protection when in noise of 85 dBA TWA or greater.

Do I need a Hearing Conservation Program?

If you have asked yourself this question, the answer is probably yes! There are a couple of ways you can test for yourself whether a hearing conservation program (HCP) is required in your facility.

- Do workers in your facility have to raise their voice to be heard by a listener about 3 feet away?
- Do workers in your facility ever report ringing in their ears after they leave work?
- Does the radio in your car seem quieter when you leave work — like someone turned it down during the day? Or conversely, does your radio seem too loud when you get in the car in the morning?

These are all indications of exposure to sound levels above 85 dBA, the level at which OSHA requires an "effective, on-going hearing conservation program." This guide will provide the basics for implementing a program in your facility.

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A practical guide to:

Complying with OSHA's Hearing Conservation Amendment CFR 1910.95



National Hearing Conservation Association

The mission of the National Hearing Conservation Association is to prevent hearing loss due to noise and other environmental factors in all sectors of society.

Compliance by the Numbers

Compliance with CFR 1910.95, the federal Hearing Conservation Amendment, is a matter of diligently following a few relatively simple steps:

1 Assess Risk of Exposure — Noise exposure monitoring, or noise measurement, is required to determine which workers are at risk for excessive exposure to noise. It is important that monitoring take into account anything the worker may do during the workday that could contribute to his/her overall noise level. OSHA bases all further hearing conservation decisions on the results of monitoring, including the requirement to have a hearing conservation program (HCP). Workers must be enrolled in an HCP, at no cost to them, when:

- their noise exposure is 85 dBA* (action level) or greater averaged over an 8-hour workday (TWA);
- the maximum sound level is 115 dBA* or greater; or
- peak (impact) noise levels are 140 dB* or greater.

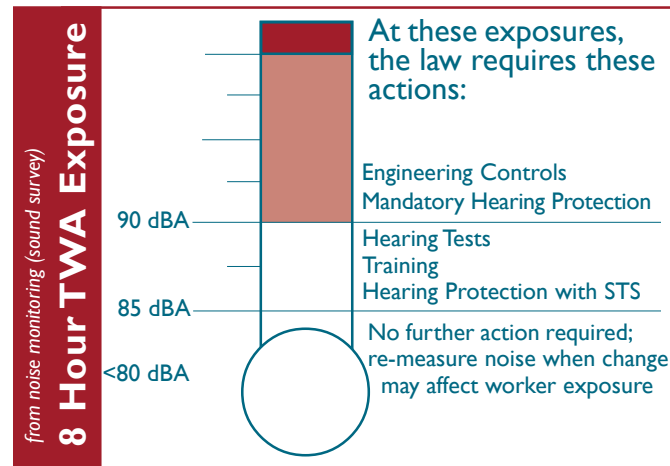
The allowable exposure for longer shifts may be lower, and can be calculated from Table G16a in the Hearing Conservation Amendment.

Repeat noise monitoring when production conditions change (new equipment or changes in production that affect noise levels) or when additional employees may be at risk of exposure at or above the action level. Workers must be provided with the results of monitoring studies, and must be able to observe monitoring if they desire.

2 Test Hearing — Part of the HCP is an annual assessment of hearing called an audiogram. Each worker in the HCP must get an original audiogram, called a baseline, within six months of starting work in an HCP area to determine how well he/she hears before they are exposed to noise by this employer. The time limit can be extended to one year if the

*Sound is measured in units called decibels (dB). For purposes of the law, most sound levels are A-weighted (dBA), or filtered to approximate how the human ear responds to noise.

employer chooses to have audiograms done by a mobile hearing testing service (see *NHCA Practical Guide #3* for help in selecting a mobile hearing test provider), but only if the worker wears hearing protection in the meantime. The worker must be noise-free for 14 hours prior to getting the baseline test to make sure the test is an accurate assessment of his/her hearing. The audiogram is then repeated yearly, with the most recent test results compared to the baseline to check for changes. Audiograms must be provided by a person trained to interpret this type of test — an audiologist, otolaryngologist, other physician, or another qualified person who has received special training in hearing testing. This person should be certified by the Council for Accreditation in Occupational Hearing Conservation (CAOHC) and/or be supervised by a professional as listed above.



3 Hearing Protection — Hearing protection devices (HPD), suitable for the noise found during noise monitoring, step one above, must be made available to all workers exposed to 85 dBA or greater. Those workers exposed above 90 dBA TWA are required to use HPDs when in noise. Longer shifts may

require hearing protection at lower sound levels. The employer must make a variety of HPDs available at no cost to the worker, and must replace them as necessary. It's the employer's responsibility to make sure that HPDs are used appropriately.

4 Training — Workers in the HCP receive annual training in the effects of noise on hearing, aspects of HPD use (including purpose, use, care, applicability, advantages, selection, fitting, and noise reduction values), the purpose for testing hearing, and explanation of the testing procedure. The training session is also a great opportunity to discuss the state of the worker's hearing and address any related questions about noise and hearing.

5 Noise Controls — The Hearing Conservation Amendment requires the implementation of feasible engineering and/or administrative controls where exposures exceed 90 dBA TWA. Administrative controls, like rotating workers in and out of noisy jobs or limiting the time noisy equipment can be run, may be hard to enforce and document. Efforts should focus on feasible engineering controls to reduce exposure to noise. Feasible has been interpreted to mean:

- the proposed control can be applied to the problem with a predictable effect (technical feasibility);
- the costs associated with the control are reasonable compared to the benefit received (economic feasibility); and/or
- the control will provide a significant benefit to workers; that is, it will reduce exposure to below 90 dBA (eliminating the need for HPD); to below 85 dBA (to eliminate the need for an HCP); or reduce exposure dose by 50 percent (a significant reduction in itself).