

THRESHOLD LEVEL

# The THRESHOLD

A T K GROUP PUBLICATION DEVOTED TO OCCUPATIONAL HEARING LOSS PREVENTION AND PROGRAM MANAGEMENT

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**815.332.3460**

## T K Group To Offer Hearing Protector Fit Testing/Training

In previous Newsletters, T K Group discussed new and emerging technologies developed to measure and validate an employee's hearing protector effectiveness to yield a Personal Attenuation Rating (PAR).

Labelled Noise Reduction Ratings rarely provide that level of attenuation indicated on the packaging in "real world" use and environments; this is due mainly to improper insertion of the device or a poorly sized device.

There are commercially available systems that evaluate "real world" attenuation of hearing protectors and many corporations are using such systems in-house not only to document attenuation but also to supplement training.

Beginning in 2011, T K Group will offer fit testing and training to generate fit test data that will attach to an employee's data history. Attenuation rating testing attempts to determine the real world effectiveness of hearing protection devices, helps employees select the device best suited to their ears and trains one to effectively use the selected device. Additionally, we offer the results of these tests on our web reporting.

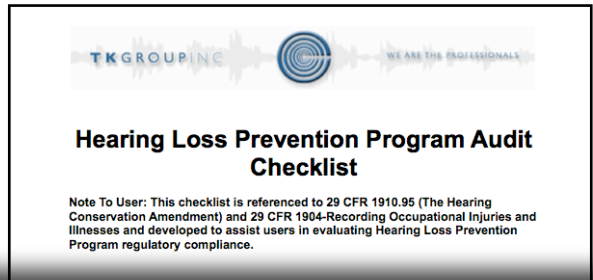
If you perform fit testing in-house and are currently a "MyTK Group" user, fit test data will be available online as well. Depending on the system used, fit testing should take no longer than a few minutes for each person that is tested.

Interested in hearing protector fit testing or PAR documentation? Please contact your T K Group Sales representative or call us 815-332-3460.

# Year End Audit

At year's end or within the first two weeks of a new year, it is a good time to evaluate that you have fulfilled compliance in response to actionable events in your Hearing Loss Prevention Program. Arguably, the greatest challenge in maintaining an effective and compliant Hearing Loss Prevention Program is records management and documentation. An Audit Checklist developed by T K Group is freely available to all clients of T K Group by simply emailing Dr. Williams at [robertwilliams@tkontheweb.com](mailto:robertwilliams@tkontheweb.com)

If your year's end review does reveal "open and unresolved" compliance events, it is better to address those events late than never. If you find that a potentially Recordable event was not reviewed for Work Relatedness, you may still request a Work Relatedness Determination.



## Hearing Loss Prevention Program Audit Checklist

**Note To User:** This checklist is referenced to 29 CFR 1910.95 (The Hearing Conservation Amendment) and 29 CFR 1904-Recording Occupational Injuries and Illnesses and developed to assist users in evaluating Hearing Loss Prevention Program regulatory compliance.

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**29 CFR 1910.95**

**1910.95(a)**  
Protection against the effects of noise exposure shall be provided when the sound levels exceed those shown in Table G-16 when measured on the A scale of a standard sound level meter at slow response. When noise levels are determined by octave band analysis, the equivalent A-weighted sound level may be determined as follows:

FIGURE G-9

**1910.95(b)(1)**  
When employees are subjected to sound exceeding those listed in Table G-16, feasible administrative or engineering controls shall be utilized. If such controls fail to reduce sound levels within the levels of Table G-16, personal protective equipment shall be provided and used to reduce sound levels within the levels of the table.

**1. Have active engineering and administrative controls been considered and/or implemented at your facility to reduce unprotected noise exposure to acceptable levels?**

No  Yes

Comments:

**2. Has your facility documented all administrative and/or engineering control attempts whether successful or not?**

No  Yes

Comments:

**3. Have all employees at your facility been fitted with appropriately attenuating hearing protection if engineering and/or administrative controls have not reduced noise levels to listed tolerances?**

No  Yes

Comments:

**1910.95(b)(2)**  
If the variations in noise level involve maxima at intervals of 1 second or less, it is to be considered continuous.

**TABLE G-16 - PERMISSIBLE NOISE EXPOSURES (1)**

Duration per day, hours	Sound level, dBA slow response
8	90
6	92
4	95
3	97
2	100
1 1/2	102
1	105
7/8	107
1/2	110
3/8	115

**Footnote(1)** When the daily noise exposure is composed of two or more periods of noise exposure of different levels, their combined effect should be considered, rather than the individual effect of each. If the sum of the following fractions:  $C(1)/T(1) + C(2)/T(2) + C(n)/T(n)$  exceeds unity, then, the mixed exposure should be considered to exceed the limit value.  $C_n$  indicates the total time of exposure at a specified noise level, and  $T_n$  indicates the total time of exposure permitted at that level. Exposure to impulsive or impact noise should not exceed 140 dB peak sound pressure level.

# New Extended Questionnaire Imminent

In early 2011, clients of T K Group will receive notification of a new Extended Questionnaire form used to determine work relatedness. T K Group requests that all clients use this new form unless otherwise directed by your corporate authority. The new form is two pages and provides more information to the reviewing audiologist to assist in determination of work relatedness for potentially OSHA Recordable hearing loss events.

EXTENDED QUESTIONNAIRE FOR OSHA RECORDABLE HEARING LOSS DETERMINATION

<b>Name:</b>	
<b>Company:</b>	
<b>Assessed Noise Exposure (TWA)</b>	<b>Shift Duration:</b> <input type="radio"/> 8 Hrs <input type="radio"/> 12 Hrs
1. What type of hearing protectors do you use at work? <input type="radio"/> None <input type="radio"/> Foam Earplugs <input type="radio"/> Ear Muffs <input type="radio"/> Canal Caps <input type="radio"/> Custom	
2. If known, what is the labelled attenuation (NRR) on your protectors?	
3. What percentage of time do you wear hearing protectors at work when exposed to noise?	
<input type="radio"/> 0%-Never <input type="radio"/> 5-20%-Rarely <input type="radio"/> 25-50%-Occasionally <input type="radio"/> 55-75%-Most of the time <input type="radio"/> 80-95%-Often <input type="radio"/> 100%-Always	
4. Do you currently have any of the following ear related complaints?	
<input type="radio"/> Ear Pain = Left Ear = Right Ear <input type="radio"/> Ear Drainage = Left Ear = Right Ear <input type="radio"/> Feeling Of Fullness = Left Ear = Right Ear <input type="radio"/> Sudden Hearing Loss = Left Ear = Right Ear <input type="radio"/> Severe Ringing In The Ear (s) = Left Ear = Right Ear	
5. Have you been diagnosed by a physician with any of the following?	
<input type="radio"/> Kidney Disease <input type="radio"/> Viral Infection <input type="radio"/> Meniere's Disease <input type="radio"/> Vestibular Disorder <input type="radio"/> Schwannoma/Acoustic Neuroma = Left Ear = Right Ear <input type="radio"/> Otosclerosis = Left Ear = Right Ear <input type="radio"/> Cholesteatoma = Left Ear = Right Ear <input type="radio"/> Cancer/Chemotherapy/Radiation <input type="radio"/> Severe Allergies <input type="radio"/> Frequent Ear Wax Impaction = Left Ear = Right Ear <input type="radio"/> Ear Injury/Perforated Eardrum = Left Ear = Right Ear <input type="radio"/> Head Injury/Concussion	
6. Do you work with any of the following chemicals? <input type="radio"/> Toluene <input type="radio"/> Xylene <input type="radio"/> Styrene <input type="radio"/> Methyl Ethyl Ketone (MEK)	
7. Do you work in noise coming from one side? <input type="radio"/> No <input type="radio"/> Yes; If Yes, which ear is most affected? = Left Ear = Right Ear	
8. Do you wear a shoulder mounted radio? <input type="radio"/> No <input type="radio"/> Yes; If Yes, which position of the speaker best applies?	
= Closer to Left Ear = Closer to Right Ear = Positioned on Center of chest	

EXTENDED QUESTIONNAIRE FOR OSHA RECORDABLE HEARING LOSS DETERMINATION

<b>Name:</b>		
9. Have you been exposed to a work related blast? <input type="radio"/> No <input type="radio"/> Yes; If Yes, which ear was most affected? = Left Ear = Right Ear		
10. Do you work a noisy second job? <input type="radio"/> No <input type="radio"/> Yes		
11. Have you served in the military? <input type="radio"/> No <input type="radio"/> Yes; If Yes, Dates of service, _____ Branch _____		
Were you noise exposed? <input type="radio"/> No <input type="radio"/> Yes		
Did you wear hearing protection? <input type="radio"/> No <input type="radio"/> Yes		
12. Do you discharge firearms? <input type="radio"/> No <input type="radio"/> Yes; If Yes, what type(s)? _____		
If Yes, how many rounds a year? _____ If Yes, what type of shooting? <input type="radio"/> Hunting <input type="radio"/> Target <input type="radio"/> Both		
If Yes, do you wear hearing protection? <input type="radio"/> No <input type="radio"/> Yes <input type="radio"/> Varies		
13. Are you left or right handed? <input type="radio"/> Left <input type="radio"/> Right		
14. Off-the-job activities	Do you use hearing protection when performing the activity?	Duration of the task per Week, Month, or Year
<input type="radio"/> Metal work/grinding	<input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Varies	
<input type="radio"/> Chain saw/chipper	<input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Varies	
<input type="radio"/> Air Tools	<input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Varies	
<input type="radio"/> Farm implements	<input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Varies	
<input type="radio"/> Leaf Blower/Lawn mower	<input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Varies	
<input type="radio"/> Loud cars/boats/motorcycle/racing	<input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Varies	
<input type="radio"/> Aviation	<input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Varies	
<input type="radio"/> Music/concerts	<input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Varies	
<input type="radio"/> Music devices (e.g. iPod)		
If Yes, which ear is most affected?		
= Left Ear = Right Ear = Both		

**Additional comments:**

\_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

**Employee Signature:**

\_\_\_\_\_  
 \_\_\_\_\_

**Date:**

\_\_\_\_\_

**\*\*\*ATTENTION SITE CONTACT\*\*\***

-This form may be emailed to [determinations@tkontheweb.com](mailto:determinations@tkontheweb.com)  
 -This form may be faxed to: 815.332.5175  
 -This form may be mailed to:  
 T K Group, Inc./1781 S. Bell School Rd.  
 Rockford, IL 61016  
 ATTN: Data Processing  
 Clients and associates of T K Group are permitted to reproduce form for corporate use. Parties not associated with T K GROUP, INC without the expressed written consent of T K GROUP, INC may reproduce no part of this form. For permission, please contact [robertwilliams@tkontheweb.com](mailto:robertwilliams@tkontheweb.com)

TKEQ REV 2011

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The Threshold is written by Robert Williams, A.u.D.

# OSHA Withdraws Proposed Rule Change

In Late 2010, T K Group informed you of OSHA's intent to revise the Federal Noise Standard by strictly enforcing engineering and administrative controls to reduce occupational noise exposure. On January 19th, 2011, OSHA issued a News Release stating that they are withdrawing the proposed interpretation entitled "*Interpretation of OSHA's Provisions for Feasible Administrative or Engineering Controls of Occupational Noise.*" The News Release is reprinted in full below. The below memo is posted at [http://www.osha.gov/pls/oshaweb/owadisp.show\\_document?p\\_table=NEWS\\_RELEASES&p\\_id=19119](http://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=NEWS_RELEASES&p_id=19119)

## News Release

U.S. Department of Labor

Release Number: 11-74-NAT

Jan. 19, 2011

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### US Department of Labor's OSHA withdraws proposed interpretation on occupational noise Agency examines other approaches to prevent work-related hearing loss

**WASHINGTON** – The U.S. Department of Labor's Occupational Safety and Health Administration today announced that it is withdrawing its proposed interpretation titled "Interpretation of OSHA's Provisions for Feasible Administrative or Engineering Controls of Occupational Noise." The interpretation would have clarified the term "feasible administrative or engineering controls" as used in OSHA's noise standard. The proposed interpretation was published in the *Federal Register* on Oct. 19, 2010.

"Hearing loss caused by excessive noise levels remains a serious occupational health problem in this country," said Dr. David Michaels, assistant secretary of labor for occupational safety and health. "However, it is clear from the concerns raised about this proposal that addressing this problem requires much more public outreach and many more resources than we had originally anticipated. We are sensitive to the possible costs associated with improving worker protection and have decided to suspend work on this proposed modification while we study other approaches to abating workplace noise hazards."

Michaels met earlier this month with the offices of Sen. Olympia Snowe and Sen. Joseph Lieberman, members of the Senate Committee on Small Business and Entrepreneurship, in response to a letter from the senators. Sens. Snowe and Lieberman are also co-chairs of the Senate Task Force on Manufacturing.

Thousands of workers every year continue to suffer from preventable hearing loss due to high workplace noise levels. Since 2004, the Bureau of Labor Statistics has reported that nearly 125,000 workers have suffered significant, permanent hearing loss. In 2008 alone, BLS reported more than 22,000 hearing loss cases, and Michaels emphasized that OSHA remains committed to finding ways to reduce this toll.

As part of this effort, the agency will:

- Conduct a thorough review of comments that have been submitted in response to the *Federal Register* notice and of any other information it receives on this issue.
- Hold a stakeholder meeting on preventing occupational hearing loss to elicit the views of employers, workers, and noise control and public health professionals.
- Consult with experts from the National Institute for Occupational Safety and Health, and the National Academy of Engineering.
- Initiate a robust outreach and compliance assistance effort to provide enhanced technical information and guidance on the many inexpensive, effective engineering controls for dangerous noise levels.

For small businesses, OSHA's On-site Consultation Program offers free and confidential advice on health and safety solutions with priority given to high-hazard worksites. Through this program, small and medium-sized employers can obtain free advice on addressing noise hazards. On-site consultation services exist in every state, and they are independent from OSHA's enforcement efforts. On-site Consultation Program consultants, employed by state agencies or universities, work with employers to identify workplace hazards, provide advice on compliance with OSHA standards, and assist in establishing safety and health management systems.

Under the Occupational Safety and Health Act of 1970, employers are responsible for providing safe and healthful workplaces for their employees. OSHA's role is to assure these conditions for America's working men and women by setting and enforcing standards, and providing training, education and assistance. For more information, visit <http://www.osha.gov>.