

Title: Hearing Conservation Written Program

Effective Date: November 2005

Revision Date: January 12, 2017

Issuing Authority: VP, Facilities and Construction Management

Responsible Officer: Director Environmental Health and Safety

### **PURPOSE OF THE WRITTEN PROGRAM**

To establish a program that fulfills the requirements of the OSHA standard for Occupational Exposures to Noise [29CFR1910.95] and designed to identify/control noise exposures.

### **SCOPE OF THIS WRITTEN PROGRAM**

The NYU Hearing Conservation Program (HCP) has been developed to protect employees from noise-induced hearing loss in the workplace. The program shall include noise monitoring, audiometric testing of applicable workers in the program, noise abatement and/or administrative controls, training and record keeping.

### **WHO NEEDS TO KNOW THIS WRITTEN PROGRAM**

All New York University academic, commercial and residential facilities.

### **PROCEDURES FOR IMPLEMENTATION**

#### **Responsibilities:**

#### **Department of Environmental Health and Safety**

Environmental Health & Safety (EHS) has overall responsibility for complying with the OSHA Hearing Conservation Program. This includes review of the standard, assessment of high noise areas at NYU and collaboration with the various departments that have high noise areas and/or employees who are part of the Hearing Conservation Program. Those employees participate in annual hearing tests which are managed by EHS.

#### **Directors or Department Chairs**

Insurance & Enterprise Risk Management currently holds the OSHA 300 log. In the event of a Standard Threshold Shift (STS) Insurance & Enterprise Risk Management must log the STS on the OSHA 300 log and hence report the STS to OSHA.

#### **Facilities Manager, Department Manager, Construction Manager and Supervisors**

Managers and other departmental heads that have employees exposed to high noise above a Time Weighted Average (TWA) of 85 decibels must allow their employees time to be tested and trained by the EHS hearing test van vendor. When and if employees within the department cannot make it to the hearing test van, the manager must make alternate arrangements for the employee to get an annual OSHA hearing test. EHS can assist managers on clinics that can provide this service. When and if employees are shown to have a Standard Threshold Shift (STS) managers must work with EHS to provide additional Hearing Conservation training and possibly purchase additional hearing protection.

### **Medical Surveillance**

Hearing test records are considered medical records and should be forwarded to HR after EHS review.

## **WRITTEN PROGRAM DEFINITIONS**

**Action Level:** Employee exposure to occupational noise that triggers the implementation of the Hearing Conservation Program (workplace noise levels that is equal to or exceeds an 8-hour Time Weighted Average [TWA] of 85dBA).

**Standard Threshold Shift [STS]:** A change in the employee's hearing threshold of an average of 10 decibels [dB] or more at 2000, 3000, and 4000 hertz [Hz] in either ear, relative to the baseline audiogram.

# UNIVERSITY WRITTEN PROGRAM

## RESPONSIBILITIES

NYU Director of Environmental Health & Safety [EHS] or designee is responsible for developing the HCP, measuring noise levels, conducting audits of the program and providing copies of the standard to applicable employees to be posted.

The Director (or designee) from any area of NYU with employees in the HCP will be responsible for compliance to the program, retaining a hearing conservation consultant to perform baseline and annual audiograms, providing appropriate hearing protectors, conducting initial and annual training, maintaining records and ensuring that all employees covered by the program attend training and annual testing.

Employees covered by the program will be responsible for reporting to baseline and annual audiometric testing, attending initial and annual training, using hearing protection as prescribed by the program and notifying supervisors of any substantial problems.

Human Resources Department is responsible for maintaining the audiograms in the employee records.

## Noise Monitoring and Notification:

1. EH&S will be responsible for measuring and interpreting noise exposure surveys. Monitoring will be performed by either a NYU Environmental Specialist or an environmental consultant retained to conduct area and personal noise surveys. The monitoring will establish noise levels in various locations of NYU and determine those job functions that expose employees to occupational noise at or above the OSHA action level.
2. Noise monitoring will be repeated whenever there is a change in equipment or controls that increase noise exposures to the extent that additional employees may be at or above the action level or the attenuation provided by hearing protectors cannot reduce exposure below the action level.
3. NYU will provide employees in the HCP or their representatives the opportunity to observe any noise survey conducted under the program.
4. EH&S will provide the Directors from an area under the HCP with results of all noise monitoring within 15 days of receipt. These Directors will then in turn provide the employees included in the HCP with the results of the survey.

## Audiometric Testing:

1. Initial and annual audiograms will be provided by NYU to all employees included in the HCP at no cost. The testing will be performed by a licensed or certified audiologist, otolaryngologist or other physician or by a technician who is certified by the Council of Accreditation in Occupational Hearing Conservation.
2. Baseline Audiogram
  - a. Performed within 6 months of an employee's inclusion in the HCP and will be used as a comparison for future audiograms.

- b. Must be preceded by at least 14 hours without exposure to workplace noise. The Director of any area included in the program will notify employees of this requirement
3. Annual Audiogram
- a. Will be scheduled by EH&S after the Directors in the HCP areas have been given written consent by regular mail or e-mail. EH&S will then contact the hearing conservation consultant and schedule the testing.
  - b. The annual audiogram will be used to determine whether a standard threshold shift [STS] has occurred. Allowance may be made for the contribution of aging. An audiologist, otolaryngologist or physician, who will be supplied with the following data, will make the evaluation:
    - i. Copy of the OSHA 29CFR1910.95 standard
    - ii. Baseline audiogram and recent annual audiogram
    - iii. Measurements of background sound pressure levels in the audiometric test room
    - iv. Calibration records of the audiometer
  - c. If the comparison of the baseline to the annual indicates a STS, the hearing conservation consultant will inform the Directors from an area under the HCP and the employee of this fact within 21 days of the determination.
  - d. The employee's supervisor will complete an Injury/Illness report for the STS, after retesting and evaluation of all hearing tests confirms the STS. This form will be obtained from the insurance website and sent to the Insurance & Enterprise Risk Management Department. If applicable, the injury will be reported on the OSHA 300 log.
  - e. If the employee is not already in the HCP and the STS is work related, the employee will be included in all aspects of the HCP, such as training, annual audiograms and will be fitted with hearing protection. However, if the employee has a STS and is already in the HCP, the employee will be retrained in the use of hearing protectors and provided with hearing protection offering greater noise attenuation.
  - f. The individual evaluating the audiogram may substitute an annual audiogram for the baseline if the STS is persistent or the hearing threshold shown in the annual exam indicates significant improvement over the baseline.
4. Audiometric tests will be pure tone, air conduction, hearing threshold exams with test frequencies including 500, 1000, 2000, 3000, 4000, and 6000 Hz and taken separately for each ear.

### Hearing Protection

1. Hearing protectors with a Noise Reduction Rating [NRR] that can attenuate the employee exposure below the action level will be the only devices used. The Directors from an area under the HCP will purchase and provide hearing protection to the applicable employees. These devices will be replaced as necessary.
2. Employees under the program will be provided with a variety of different devices in order to obtain a comfortable fit. EH&S or the hearing conservation consultant will provide training on the use, care and proper fitting of the devices.

### Training:

1. Training will be provided to NYU employees in the HCP either by EH&S or the hearing conservation consultant. All new employees will be initially trained in the program and then will be required to attend annual retraining as long as they are under the program.
2. The training program will include information on the following:
  - a. Effects of noise on hearing
  - b. Purpose, advantages and disadvantages of hearing protectors
  - c. Attenuation, fitting and care of various types of hearing protection devices
  - d. Purpose and explanation of audiometric testing procedures
3. All NYU employees will receive a copy of the hearing conservation program and the OSHA Occupational Noise Standard [29CFR1910.95] will be posted in areas, which are under the program.

### Record Keeping:

1. Noise Surveys
  - a. EH&S will maintain noise survey and exposure measurements.
  - b. The monitoring records will be maintained for a minimum of two years
2. Audiometric Testing
  - a. Human Resources Department and EH&S will maintain records of all employee audiometric tests. These records will include:
    - i. Name and job title of the employee
    - ii. Date of the audiogram
    - iii. Date of the last acoustic or exhaustive calibration of the audiometer
    - iv. Employee's most recent noise exposure assessment
    - v. Measurement of the background sound pressure levels in the test room
  - b. Audiometric testing records will be kept for the duration of employment. All records will be provided upon request to employees, former employees, representatives of the employees and the Assistant Secretary of Labor for OSHA

### **RELATED POLICIES**

NYU Environmental Health and Safety Policy

### **RELEVANT RESOURCES**

OSHA Occupational Noise Standard 29CFR1910.95