

10/10/2019

Jenny Phelps, Loss Control Program Coordinator
Richland County
50 Park Ave E
Mansfield, Ohio 44902

Re: Policy # 37000001

Dear Jenny Phelps:

An industrial hygiene (IH) noise assessment was conducted at Richland County on 09/17/2019. The purpose of the IH assessment was to determine worker exposures to noise. To accomplish this, two kennel workers were monitored for noise exposure according to the methods described in [Attachment A](#). The results are compared to currently applicable occupational exposure limits (OELs) such as the Occupational Safety and Health Administration (OSHA) Action Level (AL) and Permissible Exposure Limit (PEL) and the American Conference of Governmental Industrial Hygienists' Threshold Limit Value (ACGIH-TLV®).

RESULTS SUMMARY

The noise monitoring results show that:

- Both of the kennel workers had noise exposures at or above the OSHA Action Level but below the OSHA PEL.
- Although the personal exposures to noise did not exceed the OSHA PEL, they were approaching this level of exposure.

Based on these results, it is recommended that the employees monitored and any others who may spend a large amount of time in the kennels be included in a hearing conservation program. I would also recommend that these employees wear hearing protection when working in the kennel.

For more details and next steps, please see the **Results and Recommendations** section of this report.

I would like to thank you and the workers who participated in this assessment for the courtesy and cooperation I experienced.

Sincerely,

James C Clark

James Clark
Industrial Safety Hygienist 4
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Monitoring Details and Observations

An industrial hygiene noise assessment was conducted at Richland County on 09/17/2019. The purpose of the IH assessment was to determine worker exposures to occupational noise. The objective of the assessment was to measure exposure to occupational noise to allow for the implementation of a hearing conservation program and also the need for using hearing protectors.

Monitoring Details

The kennel workers are responsible for caring for the dogs, which are housed in cages in large rooms. The dogs begin barking whenever people enter their area.

Observations

Currently PPE is not used. I have included links that offer engineering control ideas specifically for dog kennels. You may also be eligible for a Safety Intervention Grant to help with noise reduction controls. Measurements taken with my sound level meter indicated sound levels in excess of 103 dBA when the dogs are barking.

Results and Recommendations

Results

The noise monitoring results and applicable OELs are summarized in Table 1.

Recommendations

The kennel workers need to be included in a hearing conservation program (an example is attached to this report) based on the measure exposures from this survey. Although not required, I would recommend that these employees wear hearing protection when working with the dogs while in the kennel.

If employees do choose to wear hearing protection, please ensure that they are worn correctly. Improper use/insertion of hearing protectors offer limited protection.

If engineering controls are implemented, please do not hesitate to contact me to schedule a follow-up evaluation.

The recommendations included in this report are intended to assist you in your compliance efforts. The recommendations may not include or identify all the corrective actions necessary to ensure compliance with federal, state or local laws, regulations, codes and standards. This report and the recommendations contained herein do not guarantee that all workplace hazards were identified on the date of visit or that your workplace is free of occupational hazards. The absence of a recommendation does not indicate compliance with any applicable laws, regulations, codes or standards. Compliance with the recommendations contained in this report does not guarantee you have satisfied all legal obligations.

BWC does not make any representation or warranty, express or implied, that your workplace is safe, free of occupational hazards or in compliance with all applicable laws, regulations, codes or standards. You are encouraged to conduct periodic workplace inspections. References to specific companies or products are provided for illustrative purposes only and are not intended as endorsement of those companies or products by the Ohio Bureau of Workers' Compensation.

TABLE 1 - NOISE MONITORING RESULTS

Richland County

09/17/2019

Name	Work Location/ Operation	Time Sampled (minutes)	Results compared to ACGIH TLV 85 dBA	Results compared to OSHA AL 85 dBA	Results compared to OSHA PEL 90 dBA
Stephanie B.	Kennel Worker	437	NA	89 dBA	88 dBA
Rachel C.	Kennel Worker	434	NA	89 dBA	88 dBA
<p>NOTE: OSHA's Occupational Noise Exposure Standard, 29 CFR 1910.95, requires that noise monitoring results be made available to workers in the sampled areas. Affected workers should be provided a copy of this table. Employers must retain noise exposure measurements for 2 years (see 29 CFR 1910.95(m)(3)(i)).</p>					
<p>The results are representative of the times sampled and only reflect conditions as they existed on 09/17/2019. Individual exposures will fluctuate depending on such factors as products produced, process or material changes, workload, production downtime, and/or individual work practices. Such variability must be considered when interpreting any exposure data. There is a +/- (2) decibel error range for the dosimeters and the monitoring process.</p>					
<p>OSHA Hearing Conservation Requirements:</p>					
<p>➤ Results ≥ Action Level but < PEL = Hearing Conservation program required; use of hearing protection voluntary but strongly recommended.</p>					
<p>➤ Result ≥ PEL = Hearing Conservation program required; use of hearing protections mandatory plus assessing feasibility of engineering noise controls is mandated.</p>					

Additional general Hearing Conservation information is available at:

<http://www.osha.gov/SLTC/noisehearingconservation/index.html> and <http://www.cdc.gov/niosh/topics/noise/>.

ATTACHMENT A – NOISE SAMPLING METHODS

The noise dosimeters, Quest Micro 15, used for this survey were calibrated before and after use with a NIST-traceable acoustic calibrator. The dosimeters measure all continuous, intermittent, and impulsive sound levels from 80 dB to 130 dB according to the following parameters, with an error range of +/- 2 decibels:

Exposure Limit	Frequency Weighting	Response Factor	Threshold Level	Criterion Level	Exchange Rate
OSHA Action Level	A	slow	80 dB	90 dB	5 dB
OSHA PEL	A	slow	90 dB	90 dB	5 dB

There is growing evidence that noise exposure with simultaneous chemical exposure to certain solvents, metals and carbon monoxide (including CO from cigarette smoking) can increase the risk for developing noise-induced hearing loss. For these reasons, a conservative approach to hearing protection is warranted. Effective use of hearing protection should be mandated for any worker with potential noise exposure ≥80 dBA-TWA when concomitant chemical exposure occurs. The use of data from a one-day survey to assert or refute the potential for developing noise-induced hearing loss over a working lifetime should be done with extreme caution, and then only by someone trained in the occupational health sciences.

OSHA Action Level adjustment - Current OSHA policy requires the Action Level for noise exposures to be reduced during extended work shifts, but not the PEL. OSHA reduces the Action Level for individuals working extended work shifts according to the following formula (which is derived from Table G-16 found in Appendix A of 29 CFR 1910.95):

$$\text{Action Level} = 90 + 16.61 \times \log_{10} [50 / (12.5 \times \text{number of hours worked})]$$

For individuals working 10-hour work shifts, the Action Level would be reduced from 85 to 83 dBA; for 12-hour shifts, the Action Level would reduce to 82 dBA.

Noise Exposure Limits for Extended Work Shifts			
3dB exchange rate (TLV)		5 dB exchange rate (Action Level)	
Time (hours)	Noise limit	Time (hours)	Noise limit
4	88.01	4	90.00
6	86.25	6	87.08
8	85.00	8	85.00
10	84.03	10	83.39
12	83.24	12	82.08
14	82.57	14	80.96
16	81.99	16	80.00

ATTACHMENT B - ABBREVIATIONS & DEFINITIONS

Action Level – Exposure limits used by OSHA and NIOSH to express a health or physical hazard. They indicate the level of a harmful or toxic substance/activity which generally require medical surveillance, increased industrial hygiene monitoring, and/or biological monitoring.

dBA - The Decibel A filter covers the full audio range, 20 Hz to 20 kHz, and is similar to the response of the human ear at the lower sound levels.

OSHA - US Occupational Safety and Health Administration, part of the US Department of Labor.

Permissible Exposure Limit (PEL) - An occupational exposure limit published and enforced by OSHA as a legal standard.

Time-Weighted Average Concentration (TWA) - Refers to concentrations of airborne toxic materials which have been weighted for a certain time duration, usually 8 hours.

ATTACHMENT C – SUPPLEMENTAL INFORMATION

The following links offer information on various methods of engineering controls used to reduce sound levels in dog kennels:

<https://www.vocalboothtogo.com/sound-reduction-in-dog-kennels/>

<https://extension.purdue.edu/extmedia/VA/VA-18-W.pdf>

<https://www.controlnoise.com/treatment/kennel/>

<https://www.grandin.com/references/noise.in.animal.shelter.html>

Noise-induced hearing loss is an irreversible condition that progresses with noise exposure. It is caused by damage to the nerve cells of the inner ear and cannot be treated medically [Berger et al. 2003]. It is estimated that more than 22 million U.S. workers are exposed to workplace noise levels above 85 dBA [Tak et al. 2009] and are at risk of noise-induced hearing loss [NIOSH 1998b].

Although hearing ability commonly declines with age, exposure to excessive noise can increase the rate of hearing loss. In most cases, noise-induced hearing loss develops slowly from repeated exposure to noise over time, but the progression of hearing loss is typically greatest during the first several years of noise exposure. Noise-induced hearing loss can result also from a single noise exposure or one of short duration, depending on the intensity of the noise and the individual's susceptibility [Berger et al. 2003]. Noise-exposed workers can develop substantial hearing loss before it is clearly recognized. Even mild hearing losses can impair a person's ability to understand speech and hear many important sounds. Some people with noise-induced hearing loss also develop "tinnitus." Tinnitus is a condition in which a person perceives sound in one or both ears, but no external sound is present. Persons with tinnitus often describe hearing ringing, hissing, buzzing, whistling, clicking, or chirping like crickets. There is no cure for tinnitus.

The preferred unit for reporting noise measurements is the dBA. A-weighting is used because it approximates the "equal loudness perception characteristics of human hearing for pure tones relative to a reference of 40 dB at a frequency of 1000 Hertz (Hz)" and is considered to provide a better estimation of hearing loss risk than using unweighted or other weighting measurements [Earshen 2003].

Employees exposed to noise should have baseline and yearly hearing tests to evaluate their hearing thresholds and determine whether their hearing has changed over time. Hearing tests should be done in a quiet location. In workplace hearing conservation programs, hearing thresholds must be measured at 500, 1000, 2000, 3000, 4000, and 6000 Hz. Additionally, NIOSH recommends that 8,000 Hz should also be tested [NIOSH 1998b]. The OSHA hearing conservation standard requires analysis of changes from baseline hearing thresholds to determine if the changes are substantial enough to meet OSHA criteria for a standard threshold shift. OSHA defines a standard threshold shift as a change in hearing threshold (relative to the baseline hearing measurement) of an average of 10 dB or more at 2000, 3000, and 4000 Hz in either ear [29 CFR 1910.95]. If a standard threshold shift occurs, then the company must determine if the hearing loss also meets the requirements to be recorded on the OSHA 300 Log of Injury and Illness [29 CFR 1904.1]. In contrast to OSHA, NIOSH defines a significant threshold shift as an increase in the hearing threshold level of 15 dB or more, relative to the baseline audiogram, at any test frequency in either ear measured twice in succession. NIOSH has an REL for noise of 85 dBA, as an 8-hour TWA. For calculating exposure limits, NIOSH uses a 3-dB time/intensity trading relationship, or exchange rate. Exposure to impulsive noise should never exceed 140 dBA. For extended work shifts NIOSH adjusts the REL. When noise exposures exceed the REL, NIOSH recommends the use of hearing protection and implementation of a hearing loss prevention program.

ATTACHMENT D – SAMPLE HEARING CONSERVATION PROGRAM

The following template can be used to help your organization develop a written Hearing Conservation Program. This template cannot be used as is – you must customize the template to meet the needs of your organization. The template has been made easier for you to customize by adding visual prompts that identify some areas where your input is needed. These are identified by red text in the template. The help text in the “Check Your Understanding” boxes may be deleted in the final copy. You should also change any of the text in the template to meet your organization’s needs – for example, department names, job titles, listed responsibilities and audiologist. Your employee noise exposures and supplied hearing protection will need to be added to the appendices where appropriate.

Original Microsoft Word Template can be downloaded [HERE](#).

Purpose and Scope

Company Name’s Hearing Conservation Program is designed to protect employees from hearing loss caused by uncontrolled exposure to hazardous noise by reducing employee noise exposures and providing appropriate hearing protection where this noise cannot be controlled.

The program includes the identification and control of hazardous noise within **Company Name’s** work areas using engineering and administrative controls combined with the selection and use of hearing protection. It also details the areas of responsibility for managers/department heads, supervisors and employees within the company. Additionally, the program includes requirements for noise exposure surveys, audiometric testing, training in the selection and use of hearing protection, recordkeeping and program evaluation.

This program applies to all employees whose noise exposure levels equal or exceed an 8-hour time-weighted average (TWA) noise level of 85 dBA. All employees are required to follow the minimum procedures outlined in this program. Any deviations from this program must be immediately brought to the attention of the Program Administrator.

Program Responsibilities

Management - The management of **Company Name** is committed to the safety and health of its workers. Management supports the efforts of the Program Administrator by pledging financial and leadership support for the identification and mitigation of noise hazards. Management will regularly communicate with employees about this program.

Program Administrator - The Program Administrator reports directly to upper management and is responsible for conducting the hazard assessments, and the implementation, training and administration of the program. The Program Administrator will monitor the results of the program to determine needed focus areas. The Program Administrator will also:

- Coordinate and supervise any noise exposure monitoring
- Identify employees to be included in the program
- Designate areas where hearing protection must be worn
- Coordinate and supervise audiometric testing
- Develop hearing protection policies
- Supervise hearing protection selection
- Supervise employee training
- Coordinate and supervise recordkeeping
- Evaluate the program annually
- Update the program whenever new equipment is introduced

Supervisors - Supervisor's responsibilities include:

- Notifying the Program Administrator if a change in the workplace results in higher noise exposure levels
- Ensuring that employees properly use and maintain their hearing protection
- Ensuring employees comply with the requirements of this program

Employees - All employees working in designated noise areas with noise exposures equal or exceeding the action level (85 dBA for an 8-hour shift, 84 for 9-hour, 83 for 10-hour and 82 for 12-hour) will be included in the program. A list of identified areas and employees can be found in **Appendix A**. Employee responsibilities include:

- Notifying their supervisor if a change in the workplace results in exposure to higher noise levels
- Using noise control measures as required
- Using hearing protection as required
- Attending all training and audiometric testing
- Notifying their supervisor of any complicating medical problems as soon as possible

Check Your Understanding. The section below provides the steps to monitor an area or employee to determine whether their noise exposure is above the action level. Noise monitoring can be done by using a sound level meter which determines the noise levels in the employees hearing zone (near the ear). Using a meter works well when noise is steady or constant, but is difficult to estimate when noise is variable, such as periodic grinding, pounding or sawing. When noise is not constant, the best method is for the employees to wear a noise dosimeter, which has a microphone that is usually attached near the collar, and records noise levels for the entire shift. The dosimeter will then provide a daily time weighted average noise exposure. When daily tasks vary, it is ideal to use a dosimeter for multiple days or on multiple employees.

Noise Monitoring

Noise exposure monitoring will be conducted to:

- Determine whether hearing hazards exist
- Determine whether noise presents a safety hazard by interfering with speech communication or recognition of audible warning signals
- Identify employees for noise control efforts and establish hearing protection practices
- Identify specific noise sources that require engineering and administrative controls
- Evaluate the success of noise control efforts

The Program Administrator will determine, with the assistance of area supervisors, which areas need monitoring. Monitoring will be performed using personal dosimeters. All monitoring for noise exposure levels will be conducted by **designated person/company or outside consulting firm**. Employees will be allowed to observe or have a representative observe noise monitoring.

Monitoring will be conducted whenever there is a change in equipment, process or controls that may affect the noise levels. This includes the addition, removal or replacement of machinery, or change to the building structure. Supervisors are responsible for informing the Program Administrator when these types of changes are implemented.

The result of the noise exposure monitoring will be recorded on the form in **Appendix B**. All areas requiring hearing protection will be designated on the map included in **Appendix C**.

If the results of any monitoring equals or exceeds the action level (85 dBA TWA₈) The Program Administrator will:

- Notify in writing all employees working in areas at or above the action level
- Provide appropriate hearing protection for exposed employees

- Work with supervisors to ensure hearing protection is worn by employees at all times while in the noise area
- Investigate and implement feasible engineering and administrative controls to reduce the noise levels

Check Your Understanding. There are three methods for controlling employee exposure to noise; engineering controls, administrative controls and hearing protection. Examples of engineering controls include purchasing replacement equipment that produces less noise, redesigning existing machinery to produce less noise or building enclosures to lessen the noise exposure. Examples of administrative controls include reducing exposure through job rotation or extended breaks. Engineering controls should always be considered first. If these controls are not feasible then consider administrative controls. If neither engineering controls nor administrative controls are feasible, hearing protection must be worn that reduces the employee’s exposure to below the action level.

Noise Control

Engineering and Administrative Controls

Company Name will first attempt to control existing noise hazards by implementing as many engineering controls as possible. If engineering controls are not feasible, then administrative controls will be examined.

Hearing Protection

When engineering and administrative controls are not feasible or do not eliminate the hazardous noise, hearing protection will be required. Additionally, management, supervisors and employees shall properly wear the prescribed hearing protection while working or traveling through any area that is designated as a high noise area in **Appendix C**.

Employees will be provided with an appropriate selection of hearing protection free of charge. The selection will include [number] distinct types – moldable (foam) earplugs, pre-molded earplugs and earmuffs. The hearing protection selection must:

- Reduce all employee exposures to a level below 90 dBA TWA₈
- Include various sizes and shapes to fit ear canals
- Be appropriate for different working conditions which make hearing protection difficult to wear

The hearing protection selected and issued to all affected employees can be found in **Appendix D**. To determine the hearing protection’s effective protection level the following formulas will be used.

Type of Hearing Protection	Effective Protection
Single hearing protection	Estimated Exposure (dBA) = TWA (dBA) – [(NRR – 7) x 50%]
Dual hearing protection (plug + muff)	Estimated Exposure (dBA) = TWA (dBA) – {[(NRR – 7) x 50%] + 5}

Non-Required Hearing Protection

Employees who work in areas or at tasks that produce noise levels below the action level will be allowed to wear hearing protection for comfort reasons as long as it does not impact work communication or emergency announcements. The **designated person** will determine whether an employee can wear his/her personal hearing protection and will inspect the hearing protection prior to use. These devices will be supplied by the employee and all use and care will be the responsibility of the employee. If employee chooses to wear personal hearing protection for noise below the action level he/she is required to attend the Hearing Conservation Program training.

Check Your Understanding.

What is an audiogram? An audiogram is a hearing test that measures the quietest sounds a person can hear at different frequencies. An audiogram is provided to employees before they are first exposed to excessive noise to establish a baseline. Subsequent annual hearing tests are compared to the original baseline audiogram. The healthcare professional performing the test will look at the results for the 2000, 3000 and 4000 Hz frequencies. A change in these three frequencies that averages 10 db or more, in either ear, is called a standard threshold shift.

What is a standard threshold shift? A standard threshold shift is a significant change in hearing ability or a hearing loss. Over time, with enough threshold shift, a person will have a great deal of trouble understanding speech. A loss of hearing may or may not be an OSHA 300 log recordable injury. Refer to [1904.10](#) for additional information on how to evaluate whether a hearing loss should be recorded in the OSHA 300 log.

Audiometric Testing Program

Employees in the Hearing Conservation Program will be provided baseline and annual audiometric testing at no cost to determine if a standard threshold shift has occurred. The test will take place within 6 months of an employee's first exposure at or above the action level and will be conducted by **Audiometric Contractor**.

Annual audiograms will be conducted within one year of the baseline and every year thereafter if an employee continues to be exposed to noise levels at or above the action level. The baseline and annual audiograms will be evaluated to establish a hearing threshold and annual retests will be compared to the baseline to determine if a standard threshold shift has occurred.

Before an audiometric test can be administered, the employee must have at least 14 hours without exposure to workplace noise (such as over a weekend) or worn hearing protection for this period. Employees will have access to their monitoring and audiometric testing records.

Employees who have experienced a standard threshold shift will be referred to a clinical audiologist or otologist for further examination. Such referrals may also be made if the audiological contractor suspects that medical problems of the ear have been caused or aggravated by hearing protection.

Audiometric Contractor will comply with all requirements of the OSHA standard on hearing conservation including test location, equipment calibration and recordkeeping requirements.

Standard Threshold Shift (STS).

Any standard threshold shift will be evaluated by **Company Name's** designated physician to determine if it is work-related. This evaluation will be done at no cost to the employee. If the annual audiogram shows that an employee experienced a standard threshold shift, a retest may be conducted within 30 days and the results of the retest will be used as the annual audiogram.

If a standard threshold shift has occurred:

- The employee's hearing protection will be refitted
- The employee will be retrained in the use of hearing protection and provided with hearing protection offering greater attenuation if necessary.
- The Program Administrator will determine whether the hearing loss should be recorded in the OSHA 300 form.
- The employee will be notified in writing by **position/person designated** within 21 days (See **Appendix E**).

Check Your Understanding. Employee training is a critical component of a hearing conservation program. Remember to document all training and retraining courses with at least the following information: employee name, trainer name, content of training and date of training.

Employee Training

Employees included in the program will be required to attend initial and annual training on noise exposure and the Hearing Conservation Program. Topics will include:

- Effects of hazardous noise on hearing
- Purpose of hearing protection
- Advantages, disadvantages and attenuation of various types of hearing protection
- Instructions on selection, fitting, use and care of hearing protection
- The locations within the company where hearing protection is required
- Explanation of audiometric testing
- Review of the OSHA hearing protection standard
- Company rules and procedures concerning hearing protection and requirements for hazardous noise areas

Training of each employee will be documented using the Employee Training Record (**Appendix F**) and kept on file.

Periodic Program Review

At least annually, the Program Administrator will conduct a program review to assess the progress and success of the program. Annual reviews will be documented with the form shown in **Appendix G**.

Outside Contractors

Whenever outside personnel are contracted to work in areas where hearing protection is required, they will be informed of the hearing protection requirements by the Program Administrator or area supervisor. The noise exposure map will be shared with the contractor before any work commences.

Recordkeeping

The following records for the Hearing Conservation Program will be maintained by the Program Administrator:

- Noise exposure monitoring – retained for two (2) years
- Audiometric evaluation - retained for 30 years after employment termination

The record should include:

- Name and job classification of employee
 - Date of the audiogram
 - Examiner's name
 - Date of last acoustic or exhaustive calibration of audiometer
 - Employee's most recent noise exposure assessment
-
- Training documentation – retained for **seven** years
 - Implemented controls – retained for **two** years
 - Selected hearing protection – retained for **two** years

Appendix C – Noise Exposure Map

Paste your own maps here

Appendix E – Standard Threshold Shift Letter (template)

Provided by audiometric contractor / may be signed by Program Administrator

Appendix G – Program Evaluation Checklist

Date of Evaluation:	Evaluated by (list all present):
Written Program Reviewed: Yes No (circle one)	
Do injury records or audiometric testing indicate a need for additional employee training on the Hearing Conservation Program? Yes No (circle one)	
Do any NEW jobs, processes or areas produce a high noise levels? Yes No (circle one) If yes, list:	
Is there any record of failure to correct reported hearing or noise problems in a timely manner? If yes, what corrective action is needed?	
The following content was added/modified/removed from the written program:	
Comments:	

Questions to ask during the program evaluation:

	Yes	No
Training and Education		
Has training been conducted at least once a year?		
Was the training provided by a qualified instructor?		
Was the success of each training program evaluated?		
Is the content revised periodically?		
Are managers and supervisors directly involved?		
Are posters, regulations, handouts and employee newsletters used as supplements?		
Are counseling sessions conducted for employees having problems with hearing protection devices or showing hearing threshold shifts?		
Supervisor Involvement		
Have supervisors been provided with the knowledge required to supervise the use and care of hearing protection?		
Do supervisors wear hearing protection in appropriate areas?		
Are disciplinary actions enforced when employees repeatedly refuse to wear hearing protection?		
Noise Measurements		
Were the essential noise studies performed?		
Are the results routinely sent to supervisors and other key individuals?		
Are results included in health/medical records of noise exposed employees?		
Are results maintained appropriately?		
Are noise measurement results considered when purchasing new equipment? Modifying the facility? Relocating employees?		
Have there been changes in areas, equipment or processes that have altered noise exposure? Have follow-up noise measurements been conducted?		
Are appropriate steps taken to include (or exclude) employees in the hearing loss prevention programs whose exposures have changed?		
Engineering and Administrative Controls		
Have noise control needs been prioritized?		
Has the cost-effectiveness of various options been addressed?		
Have employees and supervisors been counseled on the operation and maintenance of noise control devices?		
Are noise control projects monitored to ensure timely completion?		
Are noisy processes conducted during shifts with fewer employees?		
Do employees have sound-treated lunch or break areas?		
Audiometry and Recordkeeping		
Has the audiometric technician been adequately trained, certified and recertified as necessary?		
Do on-the-job observations of the technicians indicate that they perform a thorough and valid audiometric test, instruct and consult the employee effectively, and keep appropriate records?		
Are hearing threshold levels reasonably consistent from test to test? If not, are the reasons for inconsistencies investigated promptly?		
Are the annual test results compared to the baseline test?		
Is the annual incidence of standard threshold shift greater than a few percent? If so, are problem areas addressed?		
Are audiometric trends identified, both in individuals and in groups of employees?		
Do records show that appropriate audiometer calibration procedures have been followed?		
Are the results of audiometric tests being communicated to supervisors and managers as well as to employees?		
Are employees with a standard threshold shift notified in writing within at least 21 days?		
Referrals		
Are referral procedures clearly specified?		
Are there letters of agreement between the company and consulting physicians or audiologists?		
Do you ensure that employees needing evaluation or treatment actually receive the service?		
Are records properly sent to the physician or audiologist, and back to the company?		
Hearing Protection Devices		
Has hearing protection been made available to all employees whose daily average noise exposures are 85 dBA or above?		

	Yes	No
Are employees given the opportunity to select from a variety of appropriate protection?		
Are employees fitted carefully with attention to comfort?		
Is hearing protection inspected regularly for wear or defects, and replaced immediately if necessary?		
If employees use disposable hearing protection, are replacements readily available?		
Do employees understand how to keep hearing protection clean?		
Have any employees developed ear infections or irritations associated with the use of hearing protection?		
Have alternative types of hearing protection been considered when problems with current devices are experienced?		
Do workers complain that hearing protection interferes with their ability to do their jobs?		
Do they interfere with spoken instructions or warning signals?		
Are these complaints addressed?		
Are employees encouraged to take their hearing protection home if they engage in noisy non-occupational activities?		
Have at-the-ear protection levels been evaluated to ensure that employees aren't over or under protected?		
Is each hearing protection user required to demonstrate that he or she understands how to use and care for the hearing protection?		
Administration		
Have there been any changes in federal or state regulations?		
Have hearing loss prevention program's policies been modified to reflect these changes?		
Are copies of company policies and guidelines regarding the hearing loss prevention program available in the offices that support the various program elements?		
Are those who implement the program elements aware of these policies?		
Are necessary materials and supplies being ordered with a minimum delay?		
Is the performance of key personnel evaluated periodically?		
If such performance is found to be less than acceptable, are steps taken to correct the situation?		
Has the failure to hear warning shouts or alarms been tied to any accidents or injuries?		
If so, have remedial steps been taken?		