

**INDUSTRIAL HEARING  
TESTING**

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Worcester, MA 01609

508-752-4663



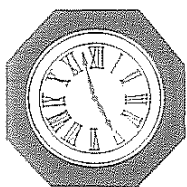
*Issue 1*

**HAVE YOU  
HEARD . . . . .**

**about all of the other  
services available at  
IHT????**

***Hearing Conservation  
Products & Services***

- Noise Surveys
- Customized  
Employee  
Training Sessions
- Hearing Protection
- Audiometer Sales
- Equipment  
Calibration
- Recordkeeping  
Software
- Posters & Support  
Literature
- Audiological  
Referrals



**Office Hours**

Monday - Friday  
8:00 AM - 4:30 PM  
*Closed weekends*  
**Tel. (508) 752-4663**

**PERSONALLY SPEAKING . . . . .**

Welcome to our first edition of Industrial Hearing Testing's Newsletter, (we like to call ourselves IHT). I hope our customers will find this to be a valuable resource. I have included a section where you can "put a face to a name." Perhaps more importantly, each of our job descriptions are also listed, to help you identify who you may wish to speak with about a particular issue.

Let me tell you a short story on how this company began. IHT developed from Dr. Hengen's professional interests in hearing conservation work in the early 1970's, while on the New York University faculty. After 14 years of teaching in higher education, Dr. Hengen opened a private practice in audiology, Hearing Health Care. It was at this time that IHT was developed as well, encouraged by all the requests for his consultation work to help prevent hearing loss in the workplace. These offices are jointly located in Worcester, Massachusetts. Scott and I joined the company in the eighties. By now you know that IHT is a family run business, including my mom as well.

My family has grown with the addition of a sister-in-law, Robin, as Scott just got married this month! Needless to say, I'll be performing all of Scott's work until he returns from that cloud (#9 isn't it?! I should also mention we are all excited for him for his marriage and his recent attainment of an M.B.A. from Clark University.

Another addition around here is Ruth's first grandchild. For those of you who have been with us for some time, you know of all the fine service Ruth has provided in our office to our clients and co-workers for over 8 years now. We congratulate her on her new family member, and now you can just call here and ask for grandma!

We are also excited to be offering quite a few additional services, which I make mention of through letters to you folks. We now offer our own brand of disposable ear plugs, Noise Stoppers! Please know that we here at IHT are always available to you for any questions or comments you may have. Read on for what I hope are helpful tips to assist you with your management of your hearing conservation program. Thank you again for your business!

**ANDI HENGEN**  
Editor

An easterner walked into a Western saloon and was amazed to see a dog sitting at a table playing poker with three men. "Can that dog really read cards?" he asked.  
"Yeah, but he ain't much of a player," said one of the men. "Whenever he gets a good hand he wags his tail."

# THAT PESKY OSHA 200 LOG . . . . .

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## Which Hearing Losses Are Recordable?

Recently, there has been a lot of uncertainty concerning which hearing losses employers are required to record on OSHA 200 logs. The controversy stems from a current proposal by OSHA to revise its entire guideline for recording occupational injuries and illnesses on the Form 200. One of the most complicated fields of revision will be the guidelines for logging occupational hearing losses. Current interpretations of the guidelines vary between federal and state OSHA offices.

### Federal OSHA Interpretation

On June 4, 1991 federal OSHA issued an internal memorandum instructing regional compliance officers to cite employers for not recording work related hearing losses with an average shift in hearing of 25 dB or more at 2000, 3000 and 4000 Hz in either ear. Employers would be cited for violations under 29 CFR Part 1904.

### State OSHA Interpretation

State-run OSHA programs are allowed to enforce their own policies and interpretations as long as the guidelines are more stringent than those policies set forth by federal OSHA. Some states have recently reported a more rigorous criterion for recording occupational hearing loss. California, Michigan, North Carolina, Oregon, South Carolina, Tennessee and Washington state have all adopted a 10 dB or "STS" criterion for recording occupational hearing losses on the Form 200.

### How does this affect my current Hearing Conservation Program?

The June 4, 1991 memorandum references violations to the injury and illness recordkeeping requirements, and in no way alters or affects an employer's responsibility to comply with all of the provisions of the Hearing Conservation Amendment (29 CFR Part 1910.95). In other words, regardless of the recordkeeping guidelines in your jurisdiction, employers must continue normal follow-up procedures for all employees exhibiting a Standard Threshold Shift (STS). An STS is defined in the standard as an average shift in hearing of 10 dB at 2000, 3000 and 4000 Hz (employees in groups A and B of our report).

### What is an Occupational Hearing Loss?

A hearing loss is presumed to be work related if the employee is exposed to noise levels in excess of an 85 dBA 8-hour time-weighted average, as found in the Hearing Conservation Standard. A shift in hearing may be determined to be temporary and therefore non work-related if a retest is given within 30 days of identification. In some cases an audiological referral may be necessary to determine the likelihood of a non-occupational or medically caused hearing loss.

### Which guidelines should my company comply with?

Until the final rule is issued and unless your company is within the jurisdiction of the seven states mentioned earlier, average shifts of 25 dB or more from the original baseline should be recorded. If your company chooses a more stringent policy of recording average shifts in hearing of 10 dB or greater (groups A or B in our report), you would be in complete compliance with the injury and illness recordkeeping guidelines.

### How do I record an occupational hearing loss on the Form 200?

Occupational hearing loss should be recorded as an illness. This is specifically a disorder associated with repeated trauma (column 7f), unless the hearing loss is the result of an instantaneous event or exposure. Occupational hearing loss must be recorded within six days of identification. Identification can be considered your receipt of the report. Hearing loss later determined to be temporary or non work-related upon a professional referral may be "lined out" from the log.

Industrial Hearing Testing is working closely with OSHA personnel to keep our clientele updated with the most current provisions. If you have any questions concerning the recordability of occupational hearing losses, we will be happy to assist you.

Steven Yany, Field Engineer

*Most of us will never do great things, but we can do small things in a great way.*

# OUR THANKS TO CREATIVE PACKAGING

## for hosting our "photo shoot" a few months back.

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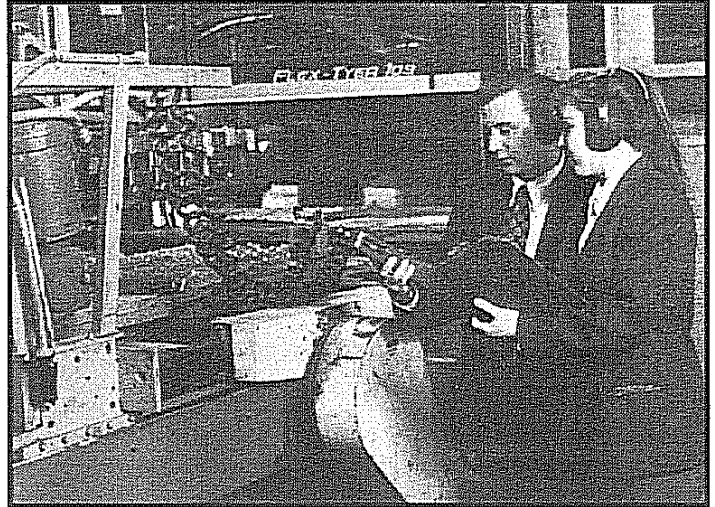
Creative Packaging, Inc. is a manufacturer of corrugated paper products and located at 175 James Street in Worcester, MA.

Creative has contracted Industrial Hearing Testing to provide yearly employee hearing audits and to perform noise level evaluations in and around the plant.

The management of Creative Packaging is very committed to the safety and health of the 85 people they employ, and are very proud of their current record of 2-1/2 years without a lost time accident.

Plant Manager Ernie McLeod would be happy to share the safety payback program that he designed and implemented at Creative 2-1/2 years ago.

Ernie can be reached at 508-756-7275.



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## DO YOU KNOW WHAT YOUR NOISE LEVELS ARE?

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As a conscientious hearing conservation program manager, we know that you strive to provide the best hearing testing and training for your employees. In addition to that part of your program, a sound survey provides critical information necessary for an **effective** Hearing Conservation Program.

**Why is a sound survey important?** Quite simply, it is the only way to obtain objective data to analyze the work environment. It is required by the OSHA regulation 1910.95, paragraph (m). You'll see this referred to as "monitoring." This monitoring needs to be conducted each time there is a "change of process or equipment." The results of the measurement must be documented and kept on file.

**Second**, a survey provides the basis on which you determine whether or not someone "must" be included in your conservation program.

**Third**, you need to know the noise exposure of each employee. This information will help confirm that the hearing protection provided has sufficient attenuation. Ultimately, adequate and consistent hearing protection is the only strategy that will ensure a successful program!

**We have good news for our clients.** In the past year we have welcomed a field engineer to our staff to assist our clientele with a comprehensive sound survey. This involves a process called personal sampling, and utilizes dosimetry equipment. A dosimeter has memory and integrates the measurements over an entire work day. This data

is expressed in decibels. This time weighted average (TWA) is the most accurate methodology. We provide a "contour map" based on your floor plan from this data. We recommend a minimum measurement of four hours per work area. Remember that a "walk-thru" with a sound level meter is **not** considered to be a formal monitoring program.

We hope to speak with you about this latest addition to our services, and we welcome any inquiries.

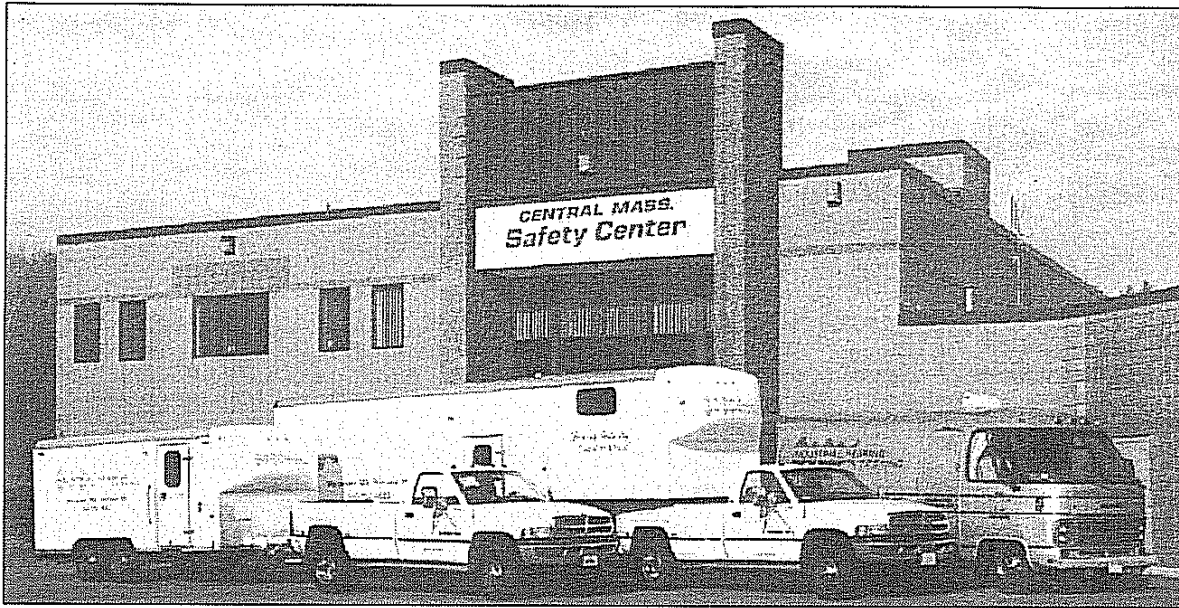
Andi Hengen

A minister parked his car in a no-parking zone in a large city and attached the following message to his windshield: "I have circled this block 10 times. Forgive us our trespasses."

When he returned to his car he found this reply attached to his own note along with a ticket: "I've circled this block for 10 years. If I don't give you a ticket, I lose my job. Lead us not into temptation."

# CAUTION

IF YOU THINK OSHA IS A SMALL TOWN IN WISCONSIN - YOU'RE IN TROUBLE.



## Do You Have ANY FRIENDS? . . .

We're growing! Thanks to all our great clients, we're anticipating another new rig by the New Year. Do you have any friends in a business who might benefit from our service? If so, please pass this newsletter along!

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