

## Industrial Hearing Testing

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# WAVELENGTH

Volume 7

No. 1

### Hearing Conservation Products & Services

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

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**CONTACT US:**  
508-832-8484

**We're on the web!**  
www.industrialhearing.com

### Office Hours

Monday - Friday  
8:00 AM - 4:30 PM  
Closed weekends  
Tel. (508) 832-8484

## Personally Speaking . . . Mending Fences

Lately, I've been spending a lot of time constructing fences. I finally took the leap of opening my own farm, something I've been putting off for a long time. So now I have 45 acres, two barns, and too many horses. I have always boarded them somewhere while I often worked a second job teaching riding and training other people's horses to pay for mine. I suspected, you see, that as soon as I signed on to be the proprietor of a stable, that I would probably be riding the tractor more than my saddle, and sure enough, I was right.



Never mind the fact that my tractor has all kinds of attachments, which I figure are designed to keep me attached to this tractor for a long time to come. Take the harrow for example. The video that closed the sale said it was a rake that could level the footing in the riding ring and grade the driveway, etc. etc., I was chomping at the bit to try it on my land, but nothing was ever mentioned about the top link, turn knuckle, something or other part. So I haven't been able to figure out how to connect it to the three point hitch yet, as there's some piece I'm missing and need to figure out the size of it...A sort of anticlimactic pause to being able to comb those steel teeth through the dirt....

I haven't even tried to use the backhoe yet, as that's a whole other set of controls I figure I have years to conquer. But the auger attachment, for example, has helped tremendously in putting up all this fencing. I'm trying to design the kind of fence to keep a herd of horses in, rather than allowing them to push to the other side where the grass is always greener, no matter the season. So I have a combination of wood fences that I'm building, barbwire that I'm trying to take down section-by-section, and an electric fence to fill in the spots where I don't have enough of either. Each type of fence comes with its own maintenance issues and problems.

A wood fence is great, but gets chewed on and pushed at. Even with the eighty-pound bag of cement securing each fence post, they don't last forever. The barbwire is devastating to a horse's limb, and for whatever reason, they can't seem to comprehend its danger to themselves. One recent holiday, I was about to depart for a barbeque at my brother Scott's. I went to put the horses away, and noticed the golden palomino mare was stumbling, and obviously hurt. Upon further investigation, I saw that she had run through a barbwire fence, and sliced open both front legs, along with some nerves and did quite a bit of damage. Needless to say, my brother was not at all surprised that I would stand him up again based on another horse tale. I needed to stay home and help the vet stitch her back up. The mare is doing fine now by the way, and my brother, well, he's used to it by now, and he probably figures we get enough of each other at work most weeks anyway...

The electric fence is yet another story. The short version is that you really have to walk the fence line every morning, as the electricity grounds out at the slightest weed or leaf resting on it. So the other week I put up a temporary section of electric fence and I turned out the mares. It took two days to put the fencing up, and it took all of about two and a half minutes for them to get into a dead run, with their tails flying behind, looking so dramatic...through my fence. I mean, right through, taking all the wires and stakes with their tangled legs. So the same fence doesn't work on all types.

Now throw a little social complication into my fencing dilemmas, trying to keep the stallions separate from the mares, and still contain a stud who will do anything, including injuring himself to hurl

*Continued on page 2*

himself to the other side, over, through, under... if he thinks he has a chance. Or the wily ponies, who I caught crawling on their knees to get underneath and out. Yeah, you're thinking ponies are cute, NOT--!

And, of course, the old saying, good fences make good neighbors is very true, as I'm sure it's a good thing when the horses don't leave deep muddy hoof prints on the neighbor's lawn.

So now I start thinking about how fences are analogous to Hearing Conservation Programs. It takes a strong base of support, the concrete of the post so to speak to have a successful program. Management must be behind the administrators of the program. Funding has to come from them, with the anticipation or belief that the benefit may not be monetary, but humanistic, saving hearing and the quality of one's life. Mend your fences regularly, play the necessary politics at your organization to gain support for your program.

Fences are no good, unless there are several components of them. They must be continuous, they must be safe, they must be seen, they must be solid, and they must be consistent. All of those same components make a successful safety program too.

The rails of the fence, the supervisors and safety personnel must be continuous. A fence that is missing a section is useless. A program of hearing protection must be continuous. It must be demonstrated by its leaders, supervisors, people who lead by example - wearing hearing protection when walking about noisy areas, even if you're "just going there for a minute." The fact is that noise exposure has a cumulative effect, so every effort at preventing noise induced hearing loss will have a pay off. Finding new ways to bring fresh energy to the same material is always a challenge, but innovation is up to all of us.

You can't allow employees to sit on the fence either. In the pasture, it's destructive to the boards, loosening and weakening the hold of the screws and nails. In the workplace it's too obvious to let them not participate so publicly. It creates negativity in your program, and indifference to your efforts.

If the electric fence is grounded out, it does not emit a shock, thereby removing any motivation for a horse to respect its confines. If your program doesn't have any authority to discipline the offenders who ignore the warning signs, i.e. use of hearing protection, participation in annual testing, etc, what will be their motivator? You have to walk the fence line every

morning on an electric fence to make sure there's nothing impeding its effectiveness. You should probably be doing a walk-thru of your manufacturing area regularly to check on the behaviors of the employees and whether or not they're using their personal protective equipment.

If the fence develops a weak spot, I can count on the herd to find the one hole in the fence and get to the other side of it before 5:00 p.m. strikes. You may get away with it for a little while, but it doesn't take long for people to find a loophole to avoid participation in some programs that are for their welfare. Do you have a disciplinary process, or a positive re-enforcement plan in place to discourage the 'neigh-sayers'? Do you have these policies protected in your Written Hearing Conservation document? And Personnel Policies?

My favorite thing to do is a jump big fence on my horses. The horses seem to have wings, the higher the fence, the more exciting and the more speed you need to get over it. Try raising the bar of your program's goals. Remember that OSHA doctrine in general is in the interest of your employee's well being, but the actual standard is often the bare minimum requirement of a particular safety regulation. How about requiring hearing protection for everyone, no matter their job duties or title, but absolutely everyone at 85 decibels, no matter the time weighted average of that exposure. Just wear it when the noise is happening, no matter that average.

So I've had my share of fencing issues on the farm, relearning that fences aren't so useful if they are not continuous in nature, completing the circle of containment, or perhaps fencing something out like a predator or pesky rodent. We relearn things all the time, so don't be afraid to use redundancy to help get your safety points across.

As Robert Frost once wrote, "Don't ever take a fence down unless you know why it was put up." Make sure that decisions you make about your program are based on sound facts. A noise survey document is the only way to know who should minimally be included in your Hearing Conservation Program. So please enjoy our newsletter and find some useful information that may help strengthen your Hearing Conservation Program. As always, thank you for your business and take care of one another!

Yours,  
ANDI HENGEN, *Editor*

## Register to win a FREE Noise Level Survey!

Please submit to us your email address with the following info:

1. Your name
2. Company / Phone #
3. Date of last survey (if any)
4. Your email address

Email your entry to: [contest@industrialhearing.com](mailto:contest@industrialhearing.com)

We will draw a winner and conduct a free noise level survey  
(including personal dosimetry - time-weighted average of employee's exposures, etc.)

### Email us now to win!

# Clinically Speaking

By C. Garth Hengen, Ph. D.

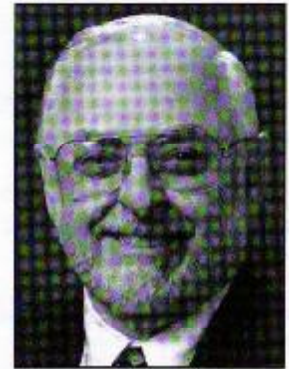
## A Real Case History : True Story

*Dr. Hengen delivered a report of the hearing testing performed for a client company. Among the employees tested was a man whose hearing loss was severe. The Human Resources director listened to the report intently. She made no particular comment when Dr. Hengen suggested that this man might pose a safety threat to himself or others because of his serious hearing loss.*

*Dr. Hengen warned her that what if, for example, this individual with a hearing loss, were a forklift operator. While travelling throughout the plant, the operator needs to be able to hear warning shouts, or other sounds of other equipment to warn them of danger. Or perhaps the employee worked on the floor and needed to hear horns or other signals to be safe. For one who hears poorly oftentimes, a work-*

*station can be creatively designed to include other than just auditory signals, such as flashing lights.*

*Two days later, Dr. Hengen received a phone call from the Human Resources Director. She reported that the employee spoken about was indeed a forklift operator. She approached him and suggested he may be a danger or endangering the safety of others. She was surprised at his response when he replied that he had been worried and concerned about the same issue. She reported that his relief was obvious and clear when she moved him to a different job.*



## Attention Miners!!!

The Eastern Mineral Aggregates Safety Council (EMASC) is a group organized to promote safety in the mining industry. These individuals get together every month, usually the 3rd Wednesday of the month, to swap information and assist one another with ideas and problem solving tips that they face in their industry. They also sponsor a workshop, usually in February, to assist with "Part 46" annual training and other safety topics, open to any MSHA sites. Call Joe DiGiacomo, at Plaza Materials at 845-357-7777. Joe tells me that they are always hoping to include any interested miners and/or any safety professionals in joining them at one of these informative and enjoyable dinner meetings.

**"What's your opinion of my idea?" the brash young man asked his boss.**

**"It isn't worth anything," said the boss.**

**"I know," conceded the young egotist, "but give it to me anyway."**

# NHCA

## NHCA

### Are you a member?

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

NHCA's membership comes from all aspects of the hearing conservation industry ranging from audiologists, physicians, safety specialists, nurses, industrial hygienists, engineers, equipment manufacturers and scientists. The Association's vital concern and focus is the prevention of noise induced hearing loss in all situations in which hazardous noise exists, and education of children and the public as to the hazardous effects of noise.

NHCA offers several types of membership categories to take advantage of their many activities and services, teaching tools, annual conference (Feb. 21-23, Dallas, TX) to name a few.

Visit their website: [www.hearingconservation.org](http://www.hearingconservation.org) or call their office at 303-224-9022 for more information.

# Technologically Speaking

By Joe Houle

These days it seems like just about everyone has a website. Individuals publish their daily happenings and family photos on the web so that family and friends from around the world can keep up-to-date with what's happening in their lives. Businesses utilize the internet to sell products and services, and to provide their customers with information that will support those products and services. Here at IHT, our goal is to provide one central point of reference for businesses to obtain detailed information about our Hearing Conservation services, the OSHA/MSHA regulations regarding such, and news about proposed changes to those regulations.

The following is a virtual tour describing the information available on our website for both our clients and those interested in our many services.

- **Noise Monitoring** - Documentation of employee noise exposure is required when employees are exposed to noise in the workplace, and is the first step in determining your need for a Hearing Conservation Program, as well as selection of proper hearing protection for those employees exposed above the Permissible Exposure Level. IHT can perform an extensive audit of your facility's noise levels.

## Loud enough for you?

*Think your workplace is loud? NIOSH offers these estimates of work-related noises:*

Loudest tone possible	194 dB
Rocket launch	180 dB
12-gauge shotgun	165 dB
Jet engine takeoff	140 dB
Ambulance siren	120 dB
Pneumatic percussion drill	119 dB
Hammer drill	114 dB
Chain saw	110 dB
Continuous miner	108 dB
Bulldozer, Spray painter	105 dB
Impact wrench	103 dB
Hand drill	98 dB
Tractor	96 dB
Belt Sander	93 dB
Hair dryer/Power lawn motor	90 dB
Ringling Telephone	80 dB
Normal conversation	60 dB
Whisper	30 dB
Weakest sound heard by average ear	0 dB

- **Hearing Testing** - An annual Audiometric screening is required for employees whose noise exposure is at or above an average of 85 Decibels when measured over an 8-hour period. IHT provides an extremely efficient system for conducting Audiometric testing. Our mobile units are capable of testing 24 employees per hour.

- **Training / Education** - Employers who are required to implement a Hearing Conservation program because of the noise levels in their facility are also required to educate employees about the dangers of noise, and how to properly use and select hearing protectors. IHT provides this training as part of our on-site services.
- **Reporting and data management** - Hearing test results must be analyzed and compared to previously conducted tests to identify those individuals who have experienced a change in their hearing sensitivity. IHT utilizes sophisticated analysis and data management software to track an employee's audiometric history, as well as to provide detailed and easy to read reports to our clients.
- **Consulting** - All Audiometric test results are reviewed by our corporate audiologist. We also assist our clients by providing customized educational sessions and hearing protector evaluations.
- **All About Hearing** - Here you will find links to the OSHA/MSHA regulations on Hearing Conservation, a schedule of upcoming safety related trade shows, and some frequently asked questions about Hearing Conservation Programs.
- **About Us** - A brief history of our company and a summary of our products and services.
- **Forms** - In this section, our clients can download several different documents necessary to support their Hearing Conservation Program. There are medical history forms available in multiple languages, a sample written Hearing Conservation program, MSHA enrollment forms, to name a few documents you may find useful.



**We're on the Web!**  
[www.industrialhearing.com](http://www.industrialhearing.com)

*You wonder if a fish goes home and exaggerates the size of the bait it stole...*

# OSHA 300 Recordability?

By Andi Hengen, B.A.

The new recordkeeping standard relating to hearing conservation CFR 1904.10 has been released and is in effect as of January 1, 2002, unless delayed. The new section requires all hearing losses with a standard threshold shift, (STS, an average change of 10dB), to be recorded on the new OSHA 300 form by checking the "hearing loss" column. The details of this CFR 1904.10 criterion are listed below.

The key features of the regulation as they relate to Hearing Conservation are:

- STS must be recorded when the average change at 2000, 3000, 4000 Hz is 10dB or greater.
- Age corrections are still optional.
- A retest is still allowed within 30 days. When retest confirms STS, recording must be made within 7 calendar days from retest. No recording is required if the STS is not confirmed on the retest.
- Work relatedness is assumed when exposure level is at or above 85 dB TWA.
- Recording is not required if a physician or other professional determines the change is not work-related.
- A five-year retention of the OSHA 300 log.

This recording criterion below is re-printed directly from the federal register Vol. 66, No. 13, Friday, January 19, 2001.

## 1904.10 Recording criteria for cases involving occupational hearing loss.

a) **Basic requirement.** If an employee's hearing test (audiogram) reveals that a Standard Threshold Shift (STS) has occurred, you must record the case on the OSHA 300 Log by checking the "hearing loss" column.

b) **Implementation.** (1) *What is a Standard Threshold Shift?* A Standard Threshold Shift, or STS, is defined in the occupational noise exposure standard at 29 CFR 1910.95 (c)(10)(i) as a change in hearing threshold, relative to the most recent audiogram for that employee, of an average of 10 decibels (dB) or more at 2000, 3000, and 4000 hertz in one or both ears.

(2) *How do I determine whether an STS has occurred?* If the employee has never previously experienced a recordable hearing loss, you must compare the employee's current audiogram with that employee's baseline audiogram. If the employee has previously experienced a recordable hearing loss, you must compare the employee's current audiogram with the employee's ~~current~~ audiogram (the audiogram reflecting the employee's previous recordable hearing loss case).

(3) *May I adjust the audiogram results to reflect the effects of aging on hearing?* Yes, when comparing audiogram results, you may adjust the results for the employee's age when the audiogram was taken using Tables F-1 or F-2, as appropriate, in Appendix F of 29 CFR 1910.95.

(4) *Do I have to record the hearing loss if I am going to retest the employee's hearing?* No, if you retest the employee's

hearing within 30 days of the first test, and the retest does not confirm the STS, you are not required to record the hearing loss case on the OSHA 300 Log. If the retest confirms the STS, you must record the hearing loss illness within seven (7) calendar days of the retest.

(5) *Are there any special rules for determining whether a hearing loss case is work-related?* Yes, hearing loss is presumed to be work-related if the employee is exposed to noise in the workplace at an 8-hour time-weighted average of 85 dBA or greater, or to a total noise dose of 50 percent, as defined in 29 CFR 1910.95. For hearing loss cases where the employee is not exposed to this level of noise, you must use the rules in 1904.5 to determine if the hearing loss is work-related.

(6) *If a physician or other licensed health care professional determines the hearing loss is not work-related, do I still need to record the case?* If a physician or other licensed health care professional determines that the hearing loss is not work-related or has not been significantly aggravated by occupational noise exposure, you are not required to consider the case work-related or to record the case on the OSHA 300 Log.

HOWEVER, another notice, released in Federal Register of July 3, 2001, contains a notice of a proposed delay of effective date of 1904.10. After the publication of the final rule, several submissions by interested parties presented counter arguments to criticize some of the major points of the final rule.

One argument offered is that an STS is not necessarily considered a serious health problem, and should therefore not be classified as a "non-minor injury or illness". Another argument debates the calculation of an average change of 10dB is not "significant" enough of a deterioration to record. Yet another angle questions the reliability of that criterion under "real-world testing conditions". (Please refer to FR66:35113-35115 at osha.gov for the complete document details.)

One of the major goals in the recordkeeping rulemaking process has been to quantify the level of hearing loss that should be recorded as a "significant" health condition. There has been much debate on what STS criterion accurately represents a "significant" amount of change in hearing sensitivity from a person's baseline. For example, whether to consider age correction or not, should the average change be represented by 15, 20 or 25, from what baseline, just to name a few of those issues. OSHA initially selected an STS change of 10dB as the appropriate criterion for recording hearing loss. This was recommended by the Coalition to Preserve OSHA and NIOSH and Protect Worker's Hearing. The Coalition's member associations include the National Hearing Conservation Association (NHCA), the American Speech-Language-Hearing Association (ASHA), the American Industrial Hygiene Association (AIHA),



CONTINUED ON PAGE 10

Two times a year, we pull our fleet off the road for cleaning and servicing. Our staff is always willing to pitch in and since it's fun to put a face to a name, we thought you'd enjoy some less formal shots of the IHT gang. Please refer to our job functions to assist with whatever you may need.

# MEET O



**President and COO**  
**Scott C. Hengen, M.B.A.**

*To improve navigation to each job - We were thinking of installing a global satellite system, but then we decided to put the President on it...*



**Administration**  
**Ken Ruel**



**Audiometric Technician**  
**David St. George**

*"Well," says Dave St. George, "it takes two audiometric technicians to change this lightbulb."*



**Senior Field Representative**      **Director of Data Processing**  
**Frank G. DiMinuco, M.S.**      **Ruth Dumas, A.S.**

*Ruth and Frank, veterans of IHT, finally got to stay inside the air conditioning and make use of their seniority.*



**Accounting**  
**Karen Mackintire, B.A.**

*Karen was the best at tanning and staying clean.*



**Receptionist**  
**Barbara Dorsey**

*Barbara is usually less confrontational with her phone reception tasks.*



**Audiometric Technician**  
**Chuck Squire**

*Chuck wouldn't let anyone else fix his trailer - (he's kind of like that)... All of IHT's technicians take great pride in the condition of their trailers, both inside and out.*



**Audiometric Technician**  
**Jim Hurley**

*Jim, our technician, working in Maine, is willing to do just about anything!*



**Can yo**



**V.P. of Oper**  
**Steve A. Yany, I**  
*Steve, our top sales sneaking back inside our outbound calls!...*



**Audiometric**  
**Dave M**

# JR TEAM



ns  
M.E.  
son, kept  
ake more



**V.P. of Marketing and Sales**  
**Andi Hengen, B.A.**  
*Andi spends most of her time at her job dreaming about flying horses.*



**Data Processing Supervisor**  
**Jennifer Martinelli, B.A.**  
*Jennifer is usually found selling or processing reports. We're not sure which is shining more, the diamond plate steel or her smile.*



chnician  
om



**Representative**  
**Jaime Alger, B.S.**  
*Jaime, from the sales and data processing dept., usually hard to catch without a smile, concentrated on painting between the lines.*



**Corporate Accountant** **CEO**  
**Maynard White, C.P.A.** **C. Garth Hengen, Ph.D.**  
*Dr. Hengen and Maynard attending IHT annual meeting. Dr. Hengen is available for employer consult and/or employee educational sessions.*



**Controller**  
**Martha Hengen, B.A.**  
*Mardy looks like she's got things under control...*



**Manager of Info. Technology**  
**Joe Houle**

*We're not sure what Joe's doing here but we're sure he's applying his management of info. technology skills somehow...*



**Audiometric Technician**  
**Jim Turner**



**Fleet Support Technician**  
**Bob Latuga**

*Bob, IHT technician, proves we can all wear hearing protection around noise. This hand grinder measured at 92 dB.*



**Fleet Support Technician**  
**Kathryn Littlepage, B.A.**

*Katie, our sound survey specialist, has many technical skills!*



**Audiometric Technician**  
**Jack Fitzpatrick, B.A.**



**Audiometric Technician**  
**Lew Merritt**

*Lew, IHT technician from NY area is soooo bossy...*

# Do You Know Your Noise Levels? POST IT!

*Available Now - Special Offer!!!*

Part of organizing and maintaining an effective Hearing Conservation Program is to make your employees very aware of hazardous areas. You should have complete documentation of a noise survey of your facility. You need to post, require and enforce the use of hearing protection in those hazardous areas. As company policy, we recommend enforcement of hearing protection at 85 dB TWA, rather than 90 dB TWA. Get updated on your noise survey now! Call our office if you haven't had a survey recently. Order these posters with an attractive message below. They are available now for only \$14.95 per sign. Polyvinyl with Adhesive strips or holes for easy posting. Red background with white letters. Actual size is 8x12 (shown below 55% size).

**“SAVE YOUR HEARING”**  
**HEARING**  
**PROTECTION**  
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**Post your noise levels!**      Quantity \_\_\_\_\_ @14.95 each \_\_\_\_\_

**Order now!**      Tax \$ \_\_\_\_\_  
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CT, ME, PA 6%)

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- Premium components for long life
- CSA Class A

## ATTENUATION DATA CHART

Frequency in Hz	125	250	500	1000	2000	3150	4000	6300	8000
Mean (dB) Attenuation	17.9	21.4	26.9	33.1	35.6	39.1	39.2	36.1	38.0
Standard Deviation	2.8	2.8	2.7	3.2	2.8	3.8	3.3	2.5	3.6
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Tax \$ \_\_\_\_\_  
(NY 4%, MA 5%,  
CT, MR, PA 6%)

**TOTAL \$** \_\_\_\_\_

# Our Personal Touch

By Frank DiMinuco, M.S.

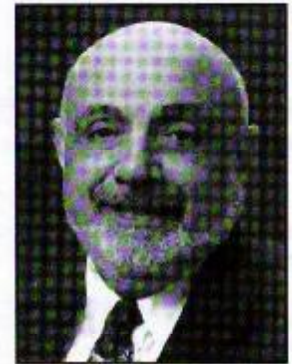
One of the goals of Industrial Hearing Testing (IHT), is to help our clients build and/or maintain the most credible Hearing Conservation Program (HCP) possible and to be in compliance with all OSHA/MSHA requirements. One of the ways we try to accomplish this is to offer a personal on-site delivery of our report and a management consultation to all of our new clients.

After the employees have been tested and the report is complete, usually within five working days, we schedule a meeting at the client's convenience. I am one of the representatives who get the opportunity to deliver the hearing testing report. We have a nine trailer fleet serving industry throughout nine states. This leaves a dramatic range of territory to tour. I have traveled from the borders of Canada, sharing the roadway with moose; to the winding back roads of New England. There is a surprising number of manufacturing plants tucked amongst the postcard perfect backdrop.

At the consultation I meet with the person who is in charge of the HCP to ensure that the content of our user-friendly report is well understood and answer any questions that there may be. Some of the features this consultation includes:

- a review of each employee's test and any follow up action required
- two sets of notification letters provided to the administrator (one for each employee and one for the company's records)
- guidance for a written HCP, to include enforcement policies for the HCP
- a poster is provided to display on the safety bulletin board to ensure covering the employee's right to know.

- explanation of the correct application of the Noise Reduction Rating (NRR) formula to whatever hearing protection devices are offered at that company. I give the much sought after coffee mug that keeps these formulas at your fingertips...do you have one?)
- review any available noise level data to ensure all exposed employees are included in the HCP (if you don't have noise level data, you should!)
- introduction of our range of other products & services



Much to our delight, our personal delivery of the audiometric test results to our new clients has been well received. It is frequently referred to as the 'personal touch' from the company that cares about their customers. If you're interested in arranging one of these on-site visits to refresh your memory and revitalize your training effectiveness with fresh ideas just call our office to arrange it.

Remember, the intention of a good Hearing Conservation Program is to identify a noise-induced hearing loss early on, and stop the loss before it has a chance to become damaging. Do your employees a favor and initiate a good Hearing Loss Prevention Program. It is a perk they will thank you for, the rest of their lives. A noise induced hearing loss is completely preventable!

## OSHA 300 Recordability? (cont.)

the Council for Accreditation of Occupational Hearing Conservationists (CAOHC), Self Help for Hard of Hearing People, Inc. and the Institute for Noise Control Engineering (INCE). For their comments and others please see [www.osha.gov](http://www.osha.gov) and select "OSHA Releases New Recordkeeping Rule" section. The Coalition's argument that an age-corrected STS is a "large hearing change that can affect communicative competence" because an age-corrected STS represents a significant amount of cumulative hearing change from baseline hearing levels." (66FR6008)

In the event that this new recordkeeping rule is delayed, employers would continue to record work-related shifts of an average of 25 dB or more at 2000, 3000, and 4000 hertz (Hz) in either ear on the OSHA 300 log. When a recordable hearing loss occurs, the audiogram indicating the hearing loss would become the new baseline for determining whether future additional hearing loss by the individual must be recorded. OSHA will remove the "Hearing Loss" column from the version of the Log to be used during calendar year, so that employers would check either the "injury" or "all other illness" column as appropriate.

### OSHA has requested comments on the following:

1. What is the appropriate criterion for recording cases of occupational hearing loss? For example, which average change of 10, 15, 20, 25dB should be applied, whether or not to consider of pre-existing hearing loss, frequency of false positives, etc.?
2. What is the variability of audiometric testing equipment and should this variability be taken into account?
3. What is the appropriate benchmark against which to measure hearing loss (original baseline, etc.)?
4. Should the recordkeeping rule treat subsequent hearing losses for the same employee as a separate case for recording purposes?

Industrial Hearing Testing will continue to monitor these regulatory issues. Any recordkeeping changes will be incorporated into the report that we provide with your annual hearing testing results.

**Call our office if you need further clarification on any of these regulatory issues.**

# Honor Roll

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We are proud and honored to have such a long list of clientele who are added to our Ten Year Honor Roll each year. We believe it signifies that our clientele appreciates the Hearing Loss Prevention Program that we have helped them institute.

**American Tool Company**

*Lisa Patterson*

**Blodgett Oven Co.**

*Dan Gaffney*

**Calley & Currier**

*Glenda Bossie*

*Dave Sansouci*

**CGIT Westboro, Inc.**

*Sean Noel*

**Cives Steel Co.**

*Curt Huber*

**Clariant**

*Susan Moran*

**Dingley Press**

*Mike Letourneau*

**Dorr Woolen Co.**

*Alexis Paskevich*

**Douglas Brothers, Inc.**

*Diane Caffey*

**Fairchild Semiconductor**

*Nancy Peck*

**FPL Energy/Wyman Station**

*Todd Bayreuther*

**FPL Energy/Western Hydro**

*Peter Bragdon*

**E.H. Friedrich Co.**

*Danna Niedzwiecki*

**Georgia Pacific**

*Diane McGuire*

**Haemonetics**

*Kathy Muncey*

**Hancock Lumber Co.**

*Mike Shane*

*Betsy Doane*

**Hanington Brothers**

*Sharon Sibley*

**Hardwood Products**

*Chuck Martell*

**Hitchiner Mfg.**

*Joan McLaughlin*

*Deborah Bisson*

**Holson Burnes**

*Penny Lapine*

**J.M. Huber Forest Products**

*Sally Hayden*

**Irving Forest Products**

*Lynn Arpin*

**Isaacson Lumber**

*Clayton Miller*

**Kezar Falls Woolen Mills**

*Faith Moody*

**Joseph Kirshner Corp.**

*Barbara Parmelee*

**Maine Wild Blueberry**

*Nancy Merritt*

**National Semiconductor**

*Rena Dunn*

**NEMR LLC**

*Mike Zaitlin*

**Nichols Portland**

*Christine Fox*

**Progressive Distributors**

*Dana Cody*

**Riley Medical Co.**

*Hank Engberg*

**Robinson Mfg. Co.**

*Mike Noble*

**Shepard Steel Co., Inc.**

*Craig E. Boudle*

**Spencer Press**

*Mark Dionne*

**Tech Industries**

*Buddy Dennome*

**Times Record, Inc.**

*Phyllis Thiboutot*

**Tom's of Maine, Inc.**

*Lorri Gould*

**Trigen-Boston Energy**

*Tom Gorham*

**R. Leon Williams Lumber**

*Carl Sanborn*



*We rejoice in our liberty*

# Prevention vs. Reaction

By Steve A. Yany, B.S.M.E.

Too often in industry, Hearing Conservation Programs (HCP) are implemented for the sole purpose of satisfying existing federal safety regulations. Companies tend to focus primarily on compliance, leaving little attention to the actual purpose or benefit of a program. Annual audiometric monitoring is perceived as a method of simply documenting changes in hearing sensitivity over time. Many employers are quick to react after the fact rather than taking the necessary steps to prevent the preventable before the damage is done. I often wonder if the real message has been lost. At IHT we strive to educate clients that the real mission of a HCP is to prevent permanent occupational noise induced hearing loss (NIHL). The annual audiometric evaluation can provide you with early information critical to accomplishing this goal. The key is to understand what information to look for and what to do with it.

It is common practice to use the Standard Threshold Shift (STS) as a benchmark to evaluate the success of your HCP. If our mission is prevention not reaction, how can we use this information to help our cause before it is too late?

The answer is in the follow up.

The first thing that must be determined is whether the STS does in fact accurately represent a permanent hearing loss. This can be accomplished by obtaining a retest within 30 days from determination of the initial change. The retest will indicate whether the initial change in hearing was temporary (TTS) or persistent (PTS).

Evidence suggests that permanent noise induced hearing loss is most likely to occur with employees who repeatedly demonstrate several TTS's over a historical period of time. Therefore, upon discovery of a TTS, employers must react quickly to prevent permanent hearing loss in the future. It is at this teachable moment that the employee must be counseled on the potential hazard, and be refit with proper hearing protection devices (HHPD). If the message is delivered, you may be able to prevent future hearing loss for this individual.

*Everyone wants to be appreciated, so if you appreciate someone, don't keep it a secret.*

*The scientific theory I like best is that the rings of Saturn are composed entirely of lost luggage.*

**Visit our Web Page!**  
**[www.industrialhearing.com](http://www.industrialhearing.com)**

Although OSHA/MSHA does not mandate a thirty-day retest upon initial identification of an STS, with our goal of prevention, we should be striving to identify TTS early. By waiting a full year to determine if an STS is temporary or persistent, valuable training time is lost and additional potential for exposure may cause further damage. Waiting the full allowable year may be too late.

Many employers are also eager to conduct annual audiometric tests prior to the workshift so that they reduce the number of Standard Threshold Shifts reported or the amount of retesting needed. It is important to note that this method of testing will fail to identify TTS early and may therefore increase the incidence of permanent hearing loss over time.

IHT continues to offer flexible on-site retest visits at reduced rates from the annual charges. This is often an opportune time to include other employees who may have missed their annual appointment. With the addition of our 9th trailer this fall, most requests can be accommodated easily.

In summary, it is important to remember that the audiometric evaluation portion of your HCP will provide you with the necessary information to minimize permanent hearing loss. The annual audiometric monitoring should be used to identify employees at risk, then educate and motivate these individuals to make wise decisions about their hearing health. In times of a questionable economy, it is important to remind ourselves that the goal of safety is to prevent, and our investment now may protect others in the future.



*A minister wound up services one morning by saying "Next Sunday I'm going to preach on the subject of liars, and I would like you to prepare by reading the 17th chapter of Mark."*

*The following Sunday, the preacher asked those who had done the requested reading to raise their hands. Nearly every hand in the congregation went up.*

*Then said the preacher, "You are the very people I want to talk to. There is no 17th chapter of Mark!"*

are you **screaming**  
to **be heard?**



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