

10. Hearing Conservation

The City's hearing conservation program is designed to help protect the hearing of individual employees who have exposure to hazardous noise levels at work. Hazardous noise is sound that exceeds the 85 dBA threshold. At levels above this threshold, the City will implement various controls and testing to monitor employee hearing and noise exposure.

Noise Monitoring and Exposure Determinations ([WAC 296-307-63205](#))

The City will conduct noise surveys to identify which work areas and groups have exposure to hazardous noise. Both sound level meters and dosimetry equipment will be used in this effort. Representative testing will be used, whereby one employee whose common work duties align well with co-workers' will be monitored and the results will be considered valid for all aligned employees. This will allow for efficiency in survey work.

If any employee feels they have been misclassified by such testing, and they were erroneously included or excluded from the program, it is their responsibility to report this to their supervisor along with an explanation as to why they feel an error has occurred. The department director or designee will determine if new survey work is appropriate to answer this concern. If it is determined that no new work is needed, an explanation must be provided to the concerned employee within five business (5) days of the decision being made.

Noise survey work will be repeated as determined by the City. Survey work should also be done if any evidence arises that suggests there may be unidentified or new noise hazards. Such evidence can be work-related hearing loss identified in staff during audiometric testing, noise complaints from workers, or a change in equipment or operational policies that resulted in exposure to hazardous noise.

Past noise surveys are kept at the following location: [S:\CITY WIDE\SAFETY\Hearing Conservation\Noise Study Results](#). Noise surveys will be kept for at least 2 years and for any additional time beyond that period when the City relies on those surveys to determine employee exposure.

All employees whose test results show a noise exposure exceeding 85 dBA TWA8 (a time-weighted average exposure covering an 8-hour shift) shall be included in the hearing conservation program.

Hearing Conservation Program

The hearing conservation program elements will only apply to those determined to have exposure to hazardous noise through noise survey work. The following elements collectively make up the hearing conservation program:

- Baseline and annual audiometric testing
- Provision of hearing protection (ear plugs and earmuffs)
- Annual training regarding the City's hearing conservation program
- Administrative and/or engineering controls to reduce employee exposure
- Signage around areas where noise levels equal or exceed 115 dBA.

The following work groups and individuals are covered under the City's hearing conservation program:

- Public Works staff with field or workshop responsibilities
- Police Department staff with field responsibilities
- Fire Department staff with field responsibilities

Baseline and Annual Audiometric Testing ([WAC 296-817-40010](#), [WAC 296-817-40015](#))

Before being exposed to any noise levels of 85 dBA at work, a baseline audiogram will be performed on all new employees or employees transitioning into positions covered by the hearing conservation program. The City will also provide annual testing to monitor any exposed employees for occupational hearing loss. Initial baseline testing will be scheduled by Human Resources. Annual hearing tests will be scheduled by department directors or designees. Human Resources will keep all test results.

The City's current annual testing provider, baseline assessment provider, and noise survey provider is Washington Audiology Services Inc.

Testing providers will advise the City if there are any individuals with documented hearing loss that is work related, identified by when an employee meets several criteria, including a Standard Threshold Shift (STS) and an average hearing level of ≥ 25 dB at select frequencies. For those individuals, the City will include the hearing loss on the OSHA Injury and Illness Log (300 form). This recordkeeping will be the responsibility of Human Resources.

It is the City's right to seek a second testing opinion when the initial audiometric testing shows hearing loss that the testing provider links to work duties. This re-testing must be done within 30 days of the original test. If the new test does not confirm the threshold shift, or the relation to occupational exposure, then the hearing loss will not be added to the OSHA Illness and Injury Log.

When there is a recordable hearing loss related to work duties, it is the responsibility of the employee's department to review exposures. The City should review the hearing conservation program to determine if there were any failings that led to the exposure which caused the hearing loss. Where failings are identified, the City will consider updates to the program to prevent similar losses in the future.

Hearing Protection ([WAC 296-817-20015](#))

The City will strive to remove any barriers to the appropriate use of hearing protection. The following hearing protection devices are currently provided by the City:

- Earplugs
 - Howard Leight Honeywell Max Earplug NRR 33 Decibels (Standards ANSI S3.19-1974 Tested)
 - EAR 3M Push-Ins NRR 28 Decibels (Standards 28 dB CSA Class AL)
 - EAR 3M Classic NRR 29 Decibels (Standards ANSI/ASA S12.71-2018)
- Safety Earmuffs
 - Peltor 3M Optime 105 NRR 30 Decibels (ANSI S3.19-1974 compliant)

If none of the stocked options are viable for employees because of ear size or other physical/medical reasons, the City will review the situation to see what other reasonable alternatives exist. **Those desiring to use different hearing protection than those models offered by the City due to personal preference must receive permission by the department director or designee before doing so.** The City must ensure the protection meets minimum requirements and provides the correct amount of noise reduction (noise reduction rating, or NRR).

Annual Training ([WAC 296-817-20020](#))

Workers in the hearing conservation program will receive training on the program, its intent, and the responsibilities of the City and staff. Training must be done by departments before first exposure, and then annually thereafter. The training will include:

- The effects of noise on hearing
- Noise controls used in the workplace
- Purpose of hearing protection, including the differences between protection option and advantages/disadvantages of each type.
- Instructions about selecting, fitting, using, and caring for hearing protection
- The purpose and procedures for program evaluation

Noise Controls

The City currently implements administrative controls to limit worker exposure to noise; these controls include City-supplied hearing protection, audiometric testing, and staff trainings. In the event that the correct application of administrative controls is insufficient to prevent documented staff hearing loss, the City will consider adopting engineering controls designed to reduce the noise emitted from applicable equipment and operations as feasible.

It shall be the duty of individual staff to wear hearing protection in compliance with this program and the known noise hazards identified in the City's noise survey results.

Signage ([WAC 296-817-20025](#))

The City is required to affix signs at the entrances and at boundaries of all work areas where employees may be exposed to noise equaling or exceeding 115 dBA (as determined by a sound level meter with slow response). The signs must clearly indicate that the area experiences high-noise and that hearing protection is required.

Hearing Conservation Program Staff Responsibilities

Director Responsibilities

- Determine when a new noise survey is necessary based on changes in equipment/operations or changes in staff audiometric test results from the previous test – as necessary
- Oversee noise survey process – as necessary
- Notify staff of noise study results within 5 days of receiving results – as necessary
- Provide initial and annual hearing conservation training to exposed staff and supervisors – annually and as necessary during onboarding
- Schedule and facilitate annual site visit for hearing tests – annually
- (Optional): Send invoices and roster of staff who received audiometric tests to AWC Retro for reimbursement by end of January of the following year – annually
- Track training attendance and schedule follow up training for staff who were unable to attend – annually and as necessary during onboarding

Supervisor Responsibilities

- Assist Directors with noise survey process – as necessary
- Attend trainings and audiometric tests – annually
- Model appropriate hearing protection practices – daily
- Direct staff with hearing-related questions or concerns to the appropriate resources – as necessary
- Direct staff not to avoid exposure to loud noises without appropriate hearing protection 14 hours prior to their audiometric test – as necessary
- Ensure the annual test is documented in the appropriate training platform if applicable.

Employee Responsibilities

- Participate in Hearing Conservation Program requirements, including baseline and annual audiometric testing, initial and annual training, and wearing appropriate hearing protection during work duties.
- Report hearing-related questions and concerns to supervisor – as necessary

HR Responsibilities

- Assist with scheduling baseline test for all new employees or employees transitioning into positions covered by the hearing conservation program as part of employee onboarding – as necessary
- Maintain employee hearing test and hearing loss results
- Distribute letters provided by testing provider to select employees, notifying them of an STS and/or a medical referral, within 21 days of receiving the annual hearing test report. Retain signed copy of each letter – as necessary
- Schedule second audiometric test for any staff member whose initial test results demonstrate measurable hearing loss – as necessary
- Update OSHA Injury and Illness log (300 form) – as necessary
- Notify Safety Committee of documented hearing loss to initiate review of existing hearing controls – as necessary