**Hearing Conservation: Policy**

Approved:



Ahmed Boomrod, President / COO

Approved:

 Michael G. Cadotte, US Director – Safety & Quality

**Change Record**

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| Rev.: | Date: | Responsible Person: | Description of Change: |
| 0 | 11/18/15 | Michael G. Cadotte | Policy creation |
| 1 | 12/04/2018 | M Cadotte | Review |
| 2 | 6/10/19 | M Cadotte | Update 5.2.1 |
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1. **POLICY:**
	1. It is the policy of GDI Omni to establish for employees procedures and policy around tasks involving exposure to noise.
	2. The hearing conservation policy shall apply whenever and employee is working in an area(s) where noise exposures equal or exceed an 8-hour time-weighted (TWA) sound level of 85 decibels measured on the A scale (slow response) or equivalent, a dose of fifty percent as measured by noise dosimeters.
2. **PURPOSE:**
	1. The purpose of this policy is to establish the working parameters for GDI Omni at all locations where the potential for unsafe noise levels may exist regardless if it is directly attributed to our service actions.
3. **SCOPE:**
	1. This policy is in effect for all GDI Omni job sites whether they are staffed, managed and/or sub contracted to other firms at any GDI jobsite.
	2. This policy shall conform to OSHA 29 CFR 1910.95 and other regulatory requirements.
4. **RESPONSIBILITY:**
	1. Facility Management - Responsible for implementation, enforcement, monitoring, training, and procurement of all PPE and equipment pertaining to hearing conservation.
	2. Employees – Responsible for following all aspects of this policy, reporting any person or persons who do not and report such situations immediately to GDI and plant management.
5. **PROCEDURAL ELEMENTS:**
	1. Establishment and Monitoring hearing conservation program
		1. When employee noise levels equal or exceed an 8-hour time weighted average (TWA) sound level of 85 dBA, feasible administrative or engineering controls shall be utilized. If such controls fail to reduce the 8-hour TWA to less than 85 dBA, PPE shall be provided and used to reduce the exposure levels.
		2. Monitoring program shall be implemented (by GDI or client) to identify employees for inclusion in the hearing conservation program and to enable the proper selection of hearing PPE.

Monitoring shall be repeated whenever a change in production, process equipment or controls increases noise exposures. When monitoring cannot establish an appropriate test, representative personal sampling shall be used to comply with the monitoring requirements. Each employee whose noise level was monitored shall be notified of the results.

* 1. Training
		1. Training on how to use hearing PPE, as well as care procedures (if any), shall be given in accordance with OSHA guidelines and recommendations from the National Hearing Conservation Association. This training will occur prior to job start, or assignment, and annually thereafter.
		2. Documentation of all training shall be recorded within the GDI training documentation system to include employee sign-offs.
		3. Training shall be in line with evaluations and conducted on an annual basis and included the following:
			1. Effects of noise on hearing
			2. Physical damage to cochlea
			3. Location of high noise areas (at specific job site)
			4. Off the job hearing hazards (chain saws, gun fire, etc.)
			5. Purpose of hearing PPE and how they work
			6. Instructions on selection, fitting use and care
			7. Types and styles
			8. Where to obtain (at company expense)
			9. Purpose of audiometric testing and explanation of test procedures
	2. Audiometric Testing
		1. All employees whose exposures are equal to or exceed 8-hr TWA of 85 dBA shall be included in an audiometric examination program.
		2. A baseline audiogram shall be performed at hire, within 6 months of first exposure to 85 dBA TWA or above or upon implementation of this policy at a site previously not exposed when at least 14 hours without exposure to workplace noise is observed.
		3. Annual testing shall be conducted at the site for all employees in the hearing conservation program and shall not be conducted with an employee who has not first been away from the exposure for a period of no less than 14 hours.
		4. Testing and data evaluation shall be in accordance with 29 CFR 1910.95
	3. Personal Protective Equipment (PPE)

Each job site needs to determine (based on testing and/or customer provided safety directive to the fact) the proper type of hear PPE (foam earplugs, pvc earplugs or earmuffs to list a common few) that shall be engaged when any area of the facility has noise levels exceeding 85 decibels with an exposure of 8 hr. TWA.

* + 1. Usage: all janitorial, sanitation and other industrial cleaning duties that are conducted in a plant where areas require hearing PPE shall utilized such PPE at all times in that plant both inside and outside of the requirement area.
		2. Disposable hearing PPE should be discarded properly after use. Non-Disposable hearing PPE shall be stored, maintained and cleaned by the employee following training and directive procedures at the company’s expense.
		3. The company shall furnish, at its expense, all required PPE including hearing protection PPE. There may be more than one type of hearing PPE available and employees may select from those provided that best meet their personal needs.
		4. Validation of PPE: hearing PPE shall be validated via industry accepted, OSHA compliant, methods through the use of a 3rd party to validate that all hearing PPE is appropriate for the noise environment(s) at the site that may require haring PPE.

This test shall be conducted whenever there is a change in noise levels, additional equipment brought to the site that may add to noise levels and/or change in the type of hearing PPE provided.

* 1. Contracted Testing Requirements
		1. GDI shall utilize a 3rd party company to perform testing (and may use to perform training as laid out in section 5.2.3 above).
		2. Technicians shall complete an approved CAOHC hearing conservation course and are under the supervision of a licensed certified audiologist when conducting all audiometric testing.
		3. Testing may be conducted on-site in mobile units or at a facility where either location provides a clean, comfortable, sanitary and non-threatening environment for GDI employees to undergo testing.
		4. All testing and calibration procedures, as well as recordkeeping, shall be in compliance with OSHA 29 CFR 1910.95 and any other regulatory requirements.
		5. Upon completion of all testing notification letters shall be returned to GDI along with interpretation of test results.
		6. Any shift in an employee’s standard threshold will result in said employee being notified by GDI HR within 3 weeks of the test’s determination in writing.
			1. In this event the employee, at company cost, shall be given medical consultation to determine what steps should be implemented including increased hearing protection