



HEARING CONSERVATION PROGRAM (HCP)

Purpose

This Procedure revises and updates the Quality Assessment Division (QAD) Hearing Conservation Program (HCP) which is designed to prevent employees with significant occupational noise exposures from suffering material hearing impairment.

Policy

It is the policy of the QAD to protect employees against potentially hazardous noise exposure and to comply with [Occupational Safety and Health Administration \(OSHA\) standard 29 CFR 1910.95](#).

Employees who perform in-plant activities must participate in all aspects of the HCP. Employees will protect themselves by wearing hearing protection devices (HPDs) when working or walking through areas of 85 decibels adjusted (dBA) or higher, participating in baseline and annual audiograms, and annual training. It is the QAD's goal to reduce the employee's worksite noise exposure to less than 80 dBA at all times. As a general rule, employees should wear HPDs in all areas of the worksite except for those that are exclusively an office environment.

Background

The QAD first implemented an HCP on August 2, 1984, to assist all employees in reducing noise exposure by providing HPDs. In 1997, the U.S. Public Health Service conducted a baseline noise exposure assessment for QAD activities, and the results revealed noise level exposures in grading chain/cooler areas from 86 dBA to 105 dBA and processing areas between 90 dBA to 103 dBA. For a comparison, these decibel levels fall in the noise range of very busy traffic to a rock drill.

Six Points of the HCP

The QAD's HCP consists of six key areas of activity. They are:

1. Noise Exposure Monitoring. QAD supervisors will collect data on all plants where services are provided.
 - a. QAD supervisors and assigned graders will ask plants to share noise exposure monitoring data to compliment the QAD's HCP.
 - b. Where monitoring is necessary, Federal Occupational Health (FOH) Services safety representatives will conduct all testing and record keeping for the QAD.
 - c. All plants that receive full-time service will be sampled at least annually through plant data or FOH monitoring.



- d. Repeat monitoring shall occur whenever there are changes in plant production, processes, or controls which increase noise exposure.
 - e. Sampling data will include specific areas of plants where QAD services are provided.
 - f. Based on monitoring data, designated wear areas of plants for HPDs will be established.
2. Audiometric Evaluation. Audiometric examinations for all graders and supervisors will consist of two types of testing groups:
- a. FOH Group - all supervisors and graders within a reasonable distance of an FOH Center.
 - b. Private Provider Group - all remaining supervisors and graders.

The Customer Service Director Shall Ensure:

- a. That in most cases, the audiometric testing will be accomplished in the March-July timeframe. All examinations (including travel time) will be conducted within the course of an employee's basic workweek. Costs for audiometric testing, referrals, and mileage will be paid by the QAD in accordance with applicable regulations or instructions.
- b. Communication is maintained with FOH centers and Private Provider contractors to minimize conflicts in scheduling appointments.
- c. Notification is supplied to FOH and Private Provider contractors of scheduled testing appointments.
- d. All new employees receive an audiometric evaluation within the first 2 weeks of employment.
- e. All supervisors and graders in their area of responsibility are tested annually.

Supervisors and Graders Shall:

- a. Supervisors will schedule appointments with the appropriate FOH Center or Private Provider location as designated by the Customer Service Director.
- b. Supervisors will notify the Customer Service Director and graders of scheduled appointment time, date, and testing location by e-mail.
- c. Report to the testing site at the designated time assigned by the supervisor, and cooperate with testing personnel while the audiometric test is conducted.



- d. Complete sections A-D of the Audiogram History/Report (FOH-17) form (Exhibit A), and provide this form to FOH personnel at the time of testing.
- e. At the time of testing supply the FOH-17 (Exhibit A), USDA Commodity Graders Baseline, and the Authorization for Disclosure of Information Forms to the testing provider assigned by the supervisor.
- f. Immediately notify their supervisor if they are unable to complete the audiometric examination so the appointment can be canceled and rescheduled.
- g. Fourteen hours prior to testing, avoid all sources of noise (loud music, power tools, firearms, motorcycles, heavy machinery, etc.) that exceed normal conversational levels.

FOH Shall:

- a. Provide a copy of the audiogram results to the employee, if requested.
 - b. Notify the QAD office of any supervisor or grader with an abnormal baseline audiometric evaluation so they may be referred to a specialist for further evaluation.
 - c. Notify the QAD office of any supervisor or grader showing a threshold shift (STS) so that a re-test can be scheduled.
 - d. Maintain confidential records of employee audiometric evaluations.
3. Hearing Protection Devices (HPDs). The QAD currently provides two types of HPDs through the QAD office. Employees have the option to select either one or both of the following:
- a. Ear Muff - provides extra protection against low frequency noise and great protection against high frequency noise. Cushions on the muffs should be regularly inspected for cracks and replaced when necessary. "Cool Pads" are disposable covers which soak up perspiration and makes muff more comfortable.
 - b. Ear plugs - available in two sizes: Medium/Large with/without cord and Small with/without cord. These can be washed daily in mild soap and warm water or sterilized with boiling water or alcohol.

After completion of the initial training, employees will be responsible for proper fit, use, care, daily inspection, and ordering of hearing protectors and replacement parts. Alternative types of hearing protectors are acceptable if for medical or physical reasons an employee cannot wear HPDs provided by the QAD. Requests for alternative protectors for medical or physical reasons must be submitted in writing along with a physician's statement to the QAD office. The physician's statement must include a description, manufacturer's data, price of the alternative type of hearing protection, and a justification for the alternative device.



NOTE: Employees must wear HPDs in designated wear areas of a plant. Supervisors during the course of their routine supervisory duties will ensure employees are properly wearing hearing protectors. Any evidence of noncompliance will be documented, and repeated failure to comply with the requirements of this Instruction will result in progressive disciplinary action. Progressive disciplinary actions are:

- a. Oral Warning documented on QAD 814 Form Employee Progress Review Report Review Report (Exhibit B).
 - b. Written warning.
 - c. Letter of reprimand.
 - d. Disciplinary action (time off less than 14 days).
 - e. Adverse action (more than 14 days).
 - f. Removal.
4. Annual Training. Annual training will be provided to all graders and field supervisors. Training shall include:
- a. Basic information on the QAD's HCP and effects of noise on hearing.
 - b. Advantages, disadvantages, and attenuation (decrease in effectiveness) of various types of HPD.
 - c. How and when to wear HPDs. How to care for HPDs.
 - d. Supervisor's role and responsibilities (including actions taken for not wearing HPDs).
 - e. Identification of the designated wear areas of an employee's worksite.
5. Recordkeeping. Records will be kept for each phase of the HCP.
- a. Noise exposure measurement records will be kept for 2 years by FOH.
 - b. Audiometric test records will be kept by FOH for the duration of an individual's employment.
 - c. Training records will be kept in the QAD office.
6. HCP Evaluation. All elements of the QAD HCP will be evaluated to determine the program's effectiveness in preventing hearing loss. Comparisons will be made on:
- a. Noise surveys
 - b. Employee audiograms.



- c. Use of HPDs.
- d. Attenuation provided by HPDs.
- e. Participation in training.

Additional Education and Training Material Available

The QAD also has brochures and video tapes available upon request through the QAD office.

1. Hearing Conservation. Occupational Safety and Health Administration (OSHA) 3074, dated 1995 (Revised). Summary of the required components of OSHA's HCP.
2. Save your Hearing Cells! Issued to all employees in 1994. New employees should request and read this pamphlet.
3. In Defense Of Hearing. A pamphlet issued to all area offices to better educate all supervisors in the importance of hearing safety.
4. S. O. S. Hearing and National Hearing Test. Video which can be loaned to employees to view on request.

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