Syracuse University

# Hearing Conservation Program

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Revised: March 2025

# Table of Contents

## 1. Introduction

Syracuse University's Hearing Conservation Program (HCP) outlines how the University will comply with the Occupational Safety and Health Administration's (OSHA's) Occupational Noise Exposure Standard 29 CFR 1910.95 (Standard) to protect employees from exposure to noise hazards in the workplace. This HCP is administered by the University's Environmental Health and Safety Services (EHSS) department.

## 2. Applicability

This HCP applies to University employees performing operations or working in areas where noise levels equal or exceed OSHA's Action Level of 85 decibels on the A-weighted scale (dBA) as an 8-hour time weighted average (TWA).

This HCP does not apply to employees voluntarily wearing hearing protection in an area and while performing a task where hearing protection is not required. This HCP also does not apply to University contractors. Contractors performing activities at the University that require hearing protection must adhere to their employer's hearing conservation program.

## 3. Roles and Responsibilities

### 3.1. Environmental Health and Safety Services (EHSS)

- Designate a suitably trained staff member(s) to serve as HCP administrator.
- Implement, maintain, and periodically review the HCP and associated procedures.
- Conduct noise hazard assessments and notify affected employees, as applicable.
- Coordinate employee audiometric testing with a licensed or certified audiologist, otolaryngologist, or other physician, or by a CAOHC certified technician (audiometric testing provider).
- Investigate and communicate any standard threshold shift as reported by audiometric testing provider.
- Provide guidance in the selection, use, proper fit and care of appropriate hearing protective devices (HPDs).
- Provide OSHA required training.
- Maintain records of exposure assessments and audiometric testing.
- Consult with department managers, supervisors, and affected employees on issues related to the HCP.

### 3.2. Department Managers and Supervisors

- Implement the HCP in their department and work areas.
- Identify operations and work areas where noise levels are suspected to exceed 85 dBA-TWA or impact noise levels are suspected to exceed 140 dB. Coordinate with EHSS to conduct a noise hazard assessment.
- Continually monitor their employee's operations and work areas for new or changing conditions that may require re-assessment and notify EHSS to conduct the re-assessment.
- Identify their HCP affected employees. Notify EHSS of their affected employees and update EHSS when changes to their affected employee list occur.
- Ensure their affected employees have access to and follow this HCP and associated procedures.
- Ensure their affected employees are aware their work areas and job tasks requiring use of hearing protection.
- Ensure labeling and signage identifying high noise areas and equipment is present and maintained.
- Ensure affected employees receive hearing conservation training upon hire and annually thereafter.

- Offer audiometric testing to the affected employees at the frequency outlined in the HCP. Schedule their affected employees for audiometric testing the with designated audiometric testing provider.
- Procure and provide appropriate hearing protective devices (HPDs) for their affected employees at no cost.
- Ensure appropriate replacement components, cleaning materials, and storage methods are available for HPDs issued to their affected employees.

### 3.3. Affected Employees

Affected employees are employees who perform job tasks or work in areas where hearing protection is required.

- Follow this HCP and associated procedures.
- Be aware of areas and work tasks requiring hearing protection.
- Wear, clean, and maintain assigned hearing protective devices (HPDs) properly.
- Attend scheduled audiometric testing appointments.
- Attend annual hearing protection training.
- Notify their supervisor or EHSS of new or changing conditions in their work areas or job tasks that may present a noise hazard or need a hazard evaluation.
- Notify their supervisor or EHSS of any fit or physical issues associated with using their assigned HPD.

## 4. Noise Hazard Assessment

Noise hazard assessments are conducted for identified work areas, operations and equipment with noise levels suspected to equal or exceed 85 dBA-TWA. Assessments are also conducted for identified work areas, operations and equipment with impact noise suspected to exceed 140 dBA. Noise hazard assessments are repeated when changes in the areas, operations, or equipment that may cause an increase in the noise level.

Noise hazard assessments include area noise monitoring and/or personal noise exposure monitoring using noise monitoring equipment calibrated in accordance with the manufacturer's instructions. If assessment results indicate a work area, operation and/or equipment exceeds the 85 dBA-TWA or an impact/impulsive noise of 140 dBA, noise control measures are implemented.

Affected employees are provided with the opportunity to observe the noise monitoring and associated results, upon request. Employees exposed at or above the 85 dBA-TWA are notified of the monitoring results.

## 5. Noise Control Measures

Noise control measures are implemented if employee noise exposures in a work area or for operations are at or above 85 dBA-TWA. Noise controls measures are selected to, at a minimum, reduce noise exposures below 90 dBA-TWA.

Noise control measures are also implemented where employee exposure to an impact or impulse noise exceeds 140 decibels for any time period.

### 5.1. Engineering and Administrative Controls

In the hierarchy of noise control methods, engineering controls are considered first, followed by administrative controls. When these controls do not reduce the noise below 85 dBA-TWA or if the controls are not feasible to implement, hearing protective devices (HPDs) are provided to and required to be worn.

### 5.2. Hearing Protective Devices

When employee noise exposures are at or above the 85 dBA-TWA, and engineering and administrative controls are not feasible or do not reduce the noise level below 85 dBA-TWA affected employees are provided with appropriate hearing protective devices (HPDs).

Appropriate HPDs are selected based on their capability, by design, to reduce the employee noise exposures to at least to 90 dBA-TWA. For employees who have incurred a persistent standard threshold shift from occupational noise exposures, as reported by the audiometric testing provider, HPDs are selected to reduce their exposure below 85 dBA-TWA.

## 6. Training

Affected employees are required to complete hearing conservation training, prior to receiving HPDs and annually thereafter. Training topics include at a minimum:

- The effect of noise on hearing.
- The purpose, advantages, disadvantages and attenuation of various HPD types.
- Instruction on HPD selection, fit, use and care.
- The purpose of audiometric testing and an explanation of the test procedures.
- Where to access the Standard.
- Where to access this HCP and associated procedures.

## 7. Audiometric Testing (Audiograms)

Audiometric testing is made available to affected employees. Audiometric testing is provided through the University's designated audiometric testing provider at no cost to the employee.

Employees are advised to avoid exposure to high levels of occupational and non-occupational noise during the 14-hour period immediately preceding baseline audiometric testing, unless hearing protective devices are used.

### 7.1. Audiogram Frequency

The audiometric testing frequency for affected employees is as follows:

- Baseline audiograms within 6 months of an employee becoming an affected employee.
- Annual audiograms within 1 year of the employee's baseline audiogram or last annual audiogram.
- Additional or more frequent audiograms if deemed necessary by the audiological evaluation provider. This includes a repeat audiogram within 30 days of an annual audiogram if an employee has experienced a standard threshold shift.

### 7.2. Audiogram Evaluation

Audiogram evaluations are performed by the University's designated audiometric testing provider. Each affected employee's annual audiogram is compared to that employee's baseline audiogram to determine if the audiogram is valid and if a standard threshold shift has occurred as defined by the Standard. Audiogram results may be adjusted to compensate for age related hearing loss per 29 CFR 1910.95 Appendix F.

If an annual audiogram identifies an employee has experienced a standard threshold shift, the employee is scheduled for a repeat audiogram within 30 days to determine if the STS is persistent and due to occupational noise exposure.

### 7.3. Standard Threshold Shift (STS)

If the audiometric test determines that the affected employee has experienced a persistent STS due to occupational exposure to noise the following actions are taken:

- The employee is informed of the test results, in writing, within 21 days of the determination.
- If the employee is not using HPDs, the employee is provided with the protective devices, trained on their use and care, and is instructed to use them.
- If the employee is already using HPDs, the employee is refitted and re-trained in their use and instructed to use them.
- The employee's most recent annual audiogram becomes the employee's new baseline audiogram.

## 8. Program Records

The following HCP records are maintained by EHSS for the frequencies indicated.

- Noise hazard assessments records are maintained for a 2-year period.
- Audiometric test results are maintained for the duration of the employee's employment. Audiometric test results include:
    - Employees name
    - Job classification
    - Date of exam
    - Examiner's name
    - Date of last calibration of the examiner's audiometer
    - Measurement of background sound pressure levels in the test room
    - Employee's most recent noise exposure measurement

HCP records are provided to employees, former employees, representatives designated by the individual employee, and OSHA upon request.