

HEARING CONSERVATION PROGRAM

J. A. Rosa Construction, LLC

An effective hearing conservation program can prevent or reduce hearing loss in the work environment and reduce the incidence of stress-related disease. In order to comply with the OSHA requirements, this written program has been established for J.A.Rosa Construction, LLC (“Rosa”). All company projects and facilities are included with this program. Copies of this written program are available for review by any employee.

Rosa’s Safety Manager will administer a hearing conservation program whenever employee noise exposures are at or above an eight-hour time-weighted average (TWA) of **85 dBA**. This is referred to as the action level.

Minimum requirements of a hearing conservation program include the following:

- Monitoring Program
- Audiometric Testing Program
- Hearing Protection
- Employee Training
- Recordkeeping

There are also specific hearing conservation program requirements for construction worksites.

ASSIGNMENT OF RESPONSIBILITY

Company Management is responsible for:

- overall support and involvement in the program,
- making safety and health a priority in Rosa operations,
- providing adequate funding for programs, and
- leading by example regarding safety and health issues.

The Safety Manager is the Program Administrator (SM) and is responsible for:

- providing oversight and technical support.
- securing the resources necessary to implement this program.
- ensuring that routine safety checks are performed.
- conducting an annual review of this program to ensure the effectiveness of the program; and,
- ensuring that proper reporting and record keeping are executed.

Supervisor/foremen are responsible for:

- compliance with this program at project sites under their supervision.
- performing routine safety checks of the work area or jobsite to ensure proper use of hearing protection and to determine if work performed needs to be re-evaluated with regards to respiratory protection.
- correcting any unsafe practices or conditions immediately.
- coordinating employee schedules for training.
- notifying the Safety Manager of potential hazards requiring assessments, or improvements to the program.

Employees are responsible for:

- complying with all aspects of this program.
- cooperating in all safety and health matters.
- reporting incidents related to hearing protection to your supervisor/foreman immediately.
- wearing all required personal protective equipment – there are no exceptions.
- inspecting the equipment in accordance with manufacturer's guidelines and instructions; and,
- reporting hazardous conditions or other health and safety concerns immediately to your supervisor/foreman/project manager.

The program is reviewed with our employees at least annually to ensure both the safety of JA Rosa employees and compliance with the OSHA Standards.

This program applies to all employees who are required to wear hearing protection during normal work operations, as well as during some non-routine or emergency operations. In general, these requirements pertain to general industry (shop) work settings. Hearing conservation on construction sites has different regulatory requirements.

Monitoring

Monitoring noise exposure levels will be coordinated by the Safety Manager (SM). It is the responsibility of Supervisors to notify the SM when there is a potential to exceed the Action Level (85dB) and a need for monitoring. Monitoring will be performed with the use of sound level meters and personal dosimeters at the discretion of the SM.

Monitoring will also be conducted whenever there is a change in equipment, process or controls that affect the noise levels. Supervisors must inform the SM when these types of changes are instituted.

Audiograms/Hearing Tests

Employees subject to the Hearing Conservation Program (HCP) who have time-weighted average (TWA) noise exposures of 85 dBA or greater for an eight (8) hour work shift will be required to have both a baseline and annual audiogram. Initiation is based solely on the measured noise exposure, ensuring preventative measures are in place before irreversible hearing damage occurs.

The audiograms will be provided by JA Rosa and coordinated by the SM at no cost to the employee.

The baseline audiogram will be given to an employee within one (1) month of employment with JA Rosa and before any exposure to high noise levels. Annual audiograms will be performed within one year from the date of the previous audiogram. It is the responsibility of the SM to schedule the annual audiogram.

If an annual audiogram shows that an employee has suffered a standard threshold shift, the employee will be retested within thirty (30) days of the annual audiogram. If the retest confirms the occurrence of a standard threshold shift, the employee will be notified in writing within twenty-one (21) days of the confirmation. Employees who do experience a standard threshold shift will be refitted with hearing protection and provided more training on the effects of noise.

Hearing Protection

Program Requirements

Rosa will initiate an HCP when employee noise exposure equals or exceeds an 8-hour Time-Weighted Average (TWA) of 85 decibels (dBA), known as the Action Level. All workers exposed at or above the Action Level must be included in the program, as outlined in the OSHA regulation 29 CFR 1910.95.

Once the Action Level is met or exceeded, the HCP must include:

Noise monitoring to identify exposed employees

- Audiometric testing: baseline hearing tests within six months of first exposure and an annual tests thereafter
- Hearing protection: employers must provide at least two types of earplugs or earmuffs and ensure proper fit and use
- Training: annual training on noise hazards, proper use of hearing protection, and understanding audiometric results
- Recordkeeping: maintain noise exposure and audiometric records for the required duration

Management, supervisors, and employees shall properly wear the prescribed hearing protection while working or traveling through any area that is designated as a high noise area.

Hearing protection will be provided at no cost to employees who perform tasks designated as having a high noise exposure and replaced, as necessary. It is the Supervisor's responsibility to require employees to wear hearing protection when noise levels reach or exceed 85 dBA. Affected employees will have the opportunity to choose from at least two distinct types of hearing protection.

Personal stereo headsets, "IPODS," or "Walkman," are not approved for hearing protection and are not permitted in any operating area of the work site.

Signage is required in areas that necessitate hearing protection. It is the responsibility of SM to provide signage to the appropriate areas.

Performed earplugs and earmuffs should be washed periodically and stored in a clean area. Foam inserts should be discarded after each use.

Employee Training

Affected employees will be required to attend training concerning the proper usage and wearing of hearing protection. The training will be conducted by the SM, or a designated representative, within a month of hire and annually thereafter. Training on the hearing conservation program must be given to employees at least one time every year. The training must be updated to stay current with changes.

Training shall consist of the following components:

- How noise affects hearing and hearing loss.
- review of the OSHA hearing protection standard.
- explanation of audiometric testing.
- rules and procedures.
- locations within the job site where hearing protection is required; and
- how to use and care for hearing protection.

Recordkeeping

All records generated by this hearing conservation program are considered medical records and recordkeeping will be conducted in accordance with JA Rosa Recordkeeping Program.

PROGRAM REVIEW

The SM conducts periodic evaluations of the workplace to ensure that the provisions of this program are being implemented. The evaluations include regular consultations with employees who use hearing protection and their supervisors, site inspections, noise monitoring, and a review of records. Identified problems are to be noted and addressed by the SM.