



NOISE HEARING CONSERVATION

Innovations Manufacturing, Inc. (the Company)

Version: 2

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Purpose

The purpose of this program is to provide a process to minimize employee-hearing loss caused by excessive occupational exposure to noise.

Scope

This program is applicable to all employees who may be exposed to noise in excess of 85 decibels (decibels).

Definitions

Audiometric testing: detection by the person being tested of a series of pure tones. For each tone, the person indicates the lowest level of intensity that they are able to perceive.

Decibels: the sound energy measured by a sound level meter using the “A” scale. The “A” scale is electronically weighted to simulate the response of the human ear to high and low frequency noise.

Slow Response: the setting on the sound level meter that averages out impulses of brief duration that would cause wide fluctuation in the sound level meter reading.

Standard Threshold Shift: a change in hearing threshold relative to the baseline audiogram of an average of 10 dB (corrected for age) at 2000, 3000 and 4000 Hz in either ear.

Key Responsibilities

Managers and Supervisors

- Ensure requirements of this program are established and maintained.
- Ensure employees are trained and comply with the requirements of this program.

Employees

- Wear hearing protection when required, attend the training, and cooperate with testing and sampling.

Procedure

Occupational hearing loss is a cumulative result of repeated or continued absorption of sound energy by the ear. Employee protection is based on reduction of the noise level at the ear or limiting the employee’s exposure time. The Company offers hearing protection to all employees exposed to potential high noise levels in working areas and to those employees requesting hearing protection.

Hearing Conservation Program

The Company has implemented a hearing conservation program for employees exposed to sound levels 85 dBA or greater. A continuing effective hearing conservation program shall be administered when employees are exposed to sound levels greater than 85 dBA on an 8-hour time-weighted average basis.

Employees will wear hearing protection in signed areas while on an owner client facility.

Monitoring Procedures to be Used When Exposure Limits Exceed the Established Level

Information collected by the Company has confirmed that noise exposure levels are above 85 dBA on a time weighted 8-hour period for most all areas of the factor operations. The resulting policy is that all workers will be

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required to wear hearing protection that meets the requirements of CFR 1910.132. The company provides full time monitoring stations as a means to communicate to openly share the decibel levels of ongoing shop activities.

Surveys

Because the noise levels of the Company manufacturing facilities are constantly monitored, and because all employees are required to wear hearing protection at all times, there will be no independent noise surveys conducted. All manufacturing process areas are considered high noise areas.

No areas of the Company have been identified as excessive noise areas where operations will produce a single impulse noise level greater than 140 dBA. Because of this finding, there is no area in the manufacturing process where double hearing protection will be required. The adequacy of hearing PPE will be reevaluated whenever noise exposures increase to the point that the PPE provided may no longer provide adequate protection. The Company will then provide more effective PPE where necessary.

If any area of Company operations is identified as an excessively high noise area producing a single sound impulse greater than 140 dBA, then the company will have an independent survey conducted to determine the type of hearing protection that will be required to reduce the noise reception of workers to below 85 dBA.

All sound measuring equipment shall be calibrated before and after each survey.

Records of sound measuring equipment calibration and noise level surveys shall be kept for 20 years.

Noise Surveys must be repeated whenever changes in the workplace may expose additional personnel to high noise or hearing protection being used by employees may not be adequate to reduce the noise exposure to a level below 85 dBA over an 8-hour time weighted average.

Sound Level Monitoring

- All owned facilities that are suspected of having noise levels exceeding 85 decibels must be monitored.

Exposure Surveys

- A representative sampling of employees shall be conducted to determine the exposure to noise over a an 8-hour time weighted period.

Signage

Clearly worded signs shall be posted at entrances to, or on the periphery of, areas where employees may be exposed to noise levels in excess of 85 decibels. These signs shall describe the hazards involved and the required protective actions.

Audiometric Testing

The Company has established that the work area produces sound levels equal to or in excess of 85 dBA over an 8-hour period. This noise level has been communicated to all employees in the new-hirer and annual safety training and constant hearing protection is required by all workers assigned to the production area and any worker or visitor entering the production work area.

Baseline Testing Guidelines

- Because constant hearing protection is required, it is determined that no Company employee will ever be exposed to noise above the action, the company will not conduct a baseline audiogram of employees. As per CFR 1910.95(g)(5)(i), if an employee is ever exposed to noise levels above the action level, they will receive a valid baseline audiogram within six months of the employee's first exposure at or above the action

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level. The Company shall establish a baseline audiogram for each exposed employee within 6 months of their first exposure.

- Within 6 months of an employee's first exposure at or above the action level, a valid baseline audiogram shall be established against which future audiograms can be compared.
- When a mobile van is used the baseline shall be established within one year.
- A qualified third party shall perform all audiometric testing, evaluation, reporting and retesting.
- Testing to establish a baseline audiogram shall be preceded by at least 14 hours without exposure to workplace noise. Hearing protection may be used to meet the requirement. Employees shall also be notified to avoid high levels of noise.

Annual Testing Guidelines

In the event an employee does meet the entry threshold to receive a baseline audiogram, the Company shall provide an annual audiogram and if a standard threshold shift has occurred the employee will be notified in writing within 21 days of determination. At least annually after obtaining the baseline audiogram, the Company shall obtain a new audiogram for each employee exposed at or above an 8-hour time-weighted average of 85 decibels. Each employee's annual audiogram shall be compared to that employee's baseline audiogram to determine if the audiogram is valid and if a standard threshold shift has occurred. If a comparison of the annual audiogram to the baseline audiogram indicates a standard threshold shift, the employee shall be informed of this fact in writing, within 21 days of the determination.

Required Recordkeeping

The Company shall maintain accurate records of all employee exposure measurements and all records are maintained as required by CFR 1910.95 (Occupational Noise Exposure).

Employee audiograms are considered medical/exposure records. These records must be kept for the length of employment plus 30 years.

Hearing Protection Devices

- Hearing protectors are made available to all employees at no cost to the employee.
- All employees are required to wear hearing protection at all times while in the work production area.
- The Company shall ensure that hearing protectors are worn at all times in the production work area.
 - If an employee is observed not wearing hearing protection in the production work area, the observer must notify the employee to don their hearing protection.
 - Once the employee has been encountered, the observer is encouraged to fill out a Good Catch form to document the occurrence.
 - The Good Catch should note whether the immediate operations were producing a noise level of 85 dBA or greater by looking at the nearest survey monitor, or if the area was below the action level at the time of the observation.
- Employees shall be properly trained in the use, care and fitting of protectors. This is done at no cost to employees.
- Employees shall be given the opportunity to select their hearing protectors from a variety of suitable hearing protectors provided by COMPANY.

TRAINING

Employees must be provided with training on at least an annual basis and shall be updated to be consistent with changes in the PPE and work processes.

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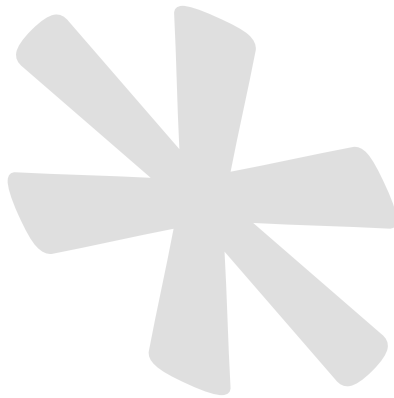


A training program shall be provided for all employees who are exposed to action level noise.

The Company provides public access to this Procedure at www.im-safety.com under the Procedures tab.

All training is documented and stored in the Company DMS.

All staff shall have a copy of this program, noise exposure procedures and it shall be posted at the worksite and a copy made available to all employees and their representatives if applicable.



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