

### **HEARING CONSERVATION**

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#### **Purpose**

The purpose of this program is to protect employees from hearing loss caused by work-related exposure to noise.

#### Scope

This policy applies to all Validus Energy worksites and employees.

#### **Process**

Validus Energy will conduct noise surveys to determine whether hazards exist.

If Validus Energy employees have noise exposure equal to or exceeding the action level (85 **Decibels**) they will be included in the hearing conservation program.

Areas consistently over 85 Decibels (example: compressor sheds) will be marked with signage stating that hearing protection is required in that area.

Various types of hearing protection will be provided to employees at the Company's expense.

#### Responsibilities

Leadership	Commit to, follow, and reinforce the requirements set forth in this program. Provide sufficient resources for implementation.
Supervisors	Ensure Validus employees have the knowledge and skills to follow this program. Verify that all employees have completed training as required.
EHS	Provide technical advice and resources to monitor compliance. Facilitate employee training. EHS serves as the plan administrator.
Validus Employees	Follow the requirements of this program. Wear hearing protection as required.

#### **Definitions**

**Decibels** - means 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.

**Standard Threshold Shift** - a change in hearing ability that is defined by OSHA as an average of 10 Decibels (dB) or more at 2000, 3000, and 4000 hertz (Hz) in one or both ears.

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#### **Policies**

#### **Hearing Conservation Program**

Any employee exposed to a time weighted average of 85 Decibels or greater will be included in the hearing conservation program. The hearing conservation program includes:

- Employee audiometric baseline testing
- Employee annual audiometric testing
- Evaluation of a Standard Threshold Shift by a licensed medical provides
- Retraining as necessary

Note: Audiometric testing requirements are included as Appendix 1

#### Surveys

A representative group of Validus Energy employees will be sampled regularly to determine if there is a time weighted exposure that meets the requirements for inclusion into the program. This sampling will be done by a qualified third party.

The results will include the following information:

- Name of area and location
- Date and time of survey
- Name of person conducting survey
- Description of instrument used (model and serial number)
- Environmental conditions
- Description of people tested

Each employee participating in the survey will be notified of the results.

#### Signs

Clearly worded signs shall be posted at the entrance or outer boundary of areas where employees may be exposed to noise levels more than 85 Decibels.

#### Records

Validus Energy will maintain records of employee exposure measurements as required by CFR 1910.95

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

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#### **Training**

Awareness training will be provided to employees not included in the hearing conservation program. It will cover:

- An overview of hearing conservation
- Hearing protection use and accessibility
- Noise surveys
- Identified potential high noise areas
- Signage

Employees in the hearing conservation program will receive annual training that covers the following:

- The requirements of this program
- The effect of noise on hearing
- The purpose of hearing protectors (advantages, disadvantages and alternatives of various types)
- Instructions on selection, fitting, use and care of hearing protection
- The purpose of audiometric testing
- An explanation of the testing procedures

All training will be documented.

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## **Change Log**

Date	Change(s) Made Original Document	Approved By Justin Stone
7/15/24	Original Document	Justin Stone

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# Appendix 1 Audiometric Testing Requirements

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If Validus Energy employees are included in the hearing conservation program, the company shall establish and maintain an audiometric testing program by making annual audiometric testing available to all employees whose exposure to noise 85 Decibels (8 hr. TWA) or greater.

- The program shall be provided at no cost to employees.
- The company shall establish a valid baseline audiogram against which future audiograms
  can be compared. An employee must receive a baseline audiogram within six months of
  their first exposure to 85 Decibels or greater for an eight-hour period.
- When a mobile van is used the baseline shall be established within one year.
- An employee shall receive an annual audiogram every year they work in a position that is exposed to noise 85 Decibels or greater for an eight-hour period.
- A qualified third party shall perform all audiometric testing, evaluation, reporting and retesting.
- Audiometric testing shall be preceded by a period of at least 14 hours during which there
  is no exposure to workplace sound levels more than 80 Decibels. This requirement may
  be met using hearing protectors that reduce the employee noise exposure level below 80
  Decibels and employees shall also be notified to avoid high levels of noise.
- An otoscopic exam is required before an audiogram is initiated. A qualified person shall
  examine the ear canal for any ear infections or canal irregularities that might affect the
  audiogram or rule out the use of earplugs.
- At least annually, and 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 for an eight-hour time weighted period. Annual audiograms shall be evaluated as follows:
  - Each audiogram shall be compared to the employees' baseline audiogram to ensure the test was valid and to determine 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.
  - If a Standard Threshold Shift is determined, the employee will be retested within 30 days.
  - o The retest results will be considered as the annual audiogram.

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- Employees shall be informed of their audiometric test results in writing within 21 days of determination.
- o If the employee has sustained a Standard Threshold Shift, after retesting, that employee shall be retrained and refitted for appropriate hearing protection.
- o The employee shall be referred for additional medical evaluation if indicated.

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