

SAFETY / OSHA UPDATE

A Newsletter from High Safety Consulting Services, Ltd.

Information on Safety & Health in Your Workplace



January, 2008

2008 HAPPY NEW ONE!

2007 was a great year for High Safety Consulting Services. We added staff and had our largest sales year since our inception 10 years ago! Our success is attributed to an opportunity to help our clients and a lot of great people on our staff and a good dose of hard work. We had some growing pains with this process as I became overwhelmed with projects, my responsiveness to proposals and projects were less than I desired at times. There are only 24 hours in a day, and sleep is necessary for at least 4-5 of those hours! I apologize if I was slow to respond to your requests this past year.

Recently Fred Miller, CSP joined our firm as a Safety and Health Consultant. Fred has about 30 years experience. He is a trainer for OSHA courses and First Aid / CPR. He is very active with ASSE and currently on the ballot for a national position. I am happy to have Fred on board and he's already alleviated some of my stress. We also had Meghan Furr join us as a safety and health technician in the past year. Meghan holds a BS from Millersville and is pursuing a M.Ed. from PennState. She will be assisting with training and program development projects. We are looking forward to a successful 2008.

i-What's Next - Apple?

Apple makes the iPod, the iPhone and the iTouch. I was fortunate enough to receive a new iTouch for Christmas. It is a great toy and my 11 year-old "hacked" it for me - (jail-broke as he called it). During the process I was worried. He occasionally would say things like "uh oh" which is never a good thing. But I have a lot of confidence in him....He the most technical savvy person I know. He installed four different boot systems on his laptop and fixed a software problem when our air quality probe wasn't talking to the portable computer. Recovered computers that we thought were so infected with viruses that they were destined for the trash. So now I can upload all sorts of applications on my iTouch in addition to listening to music. There is a volume control and a volume limit which can be turned on and off. Mine's off so I can enjoy classic rock at the appropriate volume. I had an interesting inquiry regarding establishing policy on the use of these devices in the workplace:

We have several employees that have taken a liking to listening to iPods in the workplace. Does OSHA address the use of headphones/earbuds while working or is this all too new?

My Answer:

OSHA does not really have a policy on these per se – But here's what you need to keep in mind.... iPods put out about 103 dBA at the maximum volume setting. At just 1.3 hours of exposure, this hits the daily dose for noise exposure and could result in hearing loss over time. This is compared to OSHA's level 90 dBA TWA based on 8 hrs....which is higher than the recommended average exposure of 85 dBA over 8 hours by ACGIH.

If you have noise in your workplace, this will result in individuals turning up the volume to counter the workplace noise. Also because ear-buds are not ear protection, they cannot be worn where ear protection is required as they

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would obviously interfere with a plug but also with the seal on a muff. So they would not be permissible in areas where ear protection is required.

So from an OSHA standpoint, I would suggest that it is a violation to use these devices in a high-noise area (> 90dBA). From a loss control standpoint, it is advisable not to have these used in the workplace to reduce the potential for a hearing loss which could be claimed as work-related.....but if you have good information that the noise levels are not above 90 dBA TWA in the workplace, .then you might decide to allow them. BUT...

One more consideration – Will users be able to hear alarms, warnings, phones, pages or other communications that could be important to their safety and health? If not, then I believe these are not appropriate in the workplace and could be cited by OSHA as a general duty violation.

Overall, these devices would limit communication (I know I can't hear my wife when I have mine on – that's my excuse and I'm sticking with it!) . They are not conducive to an effective and productive workplace....I would suggest prohibiting them for this reason as well...lest it is a job in a quiet area of the company that involves packing boxes alone where good alarm systems would be easily heard by the worker and other communications are not needed.

Can You Hear Me Now?

I am also working on a project involving hearing-loss. In Pennsylvania the workers' compensation law provides for a defense for the employer if the individual was not exposed to hazardous noise. The work-comp law defines this term as exceeding the OSHA PEL. There many ways to measure noise. For the purposes of complying with the OSHA PEL, a dosimeter must be set with a criterion of 90 dBA (The allow able exposure for 8 hours) and an exchange rate of 5 dB, which means that for every increase in 5 dB, there is halving of the permissible exposure time. Finally the a threshold of 90 dBA must be set, which means that sounds under 90 dBA are not included in the calculation for exposure. Note that the threshold should be set to 85dBA when doing a sound level survey to determine which employees are covered under a hearing conservation program.

An exposure of 85 dBA time-weighted-average (TWA) requires that employees be in a comprehensive hearing conservation program which includes annual audiograms. If you have a hearing conservation program, remember that average shifts in hearing of 10 dBA over the frequencies of 2K, 3K and 4K from base line (with age correction applied), require employees to be re-tested within 30 days. Otherwise the shift in hearing is assumed to be persistent. If a shift is persistent, employers must counsel employees on their hearing loss, re-fit hearing protection and require the use of ear protection at all times when exposed to noise areas at 85 dBA. In addition if the shift occurs along with a 25 dBA shift in the same frequencies from baseline of zero (without age correction). When I do compliance reviews, I often find misses on the recording hearing loss cases. One last reminder, the OSHA standard 29 CFR 1910.95 must be posted in the workplace where exposures exceed 85 dBA. OSHA requires that new sound level surveys be performed with operations change (production levels, new equipment, configurations, more personnel or new personnel could be exposed.) As a general guideline, conducting a noise survey every two to three years is advisable. Dosimetry is the best way to determine individual exposures. Sound maps and individual sound level readings have little value, unless your workplace is very static in terms of noise intensity. If you want to have reliability with your noise survey, make sure your equipment is calibrated and your calibrator is calibrated. If you need an updated sound level survey or a review of your programs, give us a call.

WHAT IS NEW WITH OSHA

For those of you covered by the Harrisburg Area Office, you are likely familiar with Bob Fink. Bob retired this past year. Bob is a wonderful safety professional and I hope he has a long and enjoyable retirement. In the past year, OSHA issued regulations on Pay for PPE, which specifies that employers must pay for most protective safety equipment. The comment period on OSHA's update to national consensus standards is now closed. In this rule, OSHA would change some of the definitions and remove or update references to consensus standards. A new Bitrex fit-testing procedure is out for comment. This speeds up the fit-testing process using this method. OSHA also issued assigned protection factors (APFs) for respirators this year. OSHA has a lot on the plate and I think we will see some additional floating of new regulations over the next year.

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Training Schedule for 2008

The 2008 training schedule will be available on-line soon. For now...Near-term programs are listed below:

March 14 - OSHA Recordkeeping at Associated Builders & Contractors from 7:30 AM to 11:30 AM (\$62 ABC Members / \$124 Non-Members / \$ 95 Special High Safety Discount). ABC members register through ABC. Call 717-653-8106.

March 17 - Mini-Session: Effectively Managing Safety from 8:00 AM to 10:00 AM (\$25) at High Industries, Inc.

April 7, 8, 14, 15 -- OSHA 30 Hour Construction Course from 7:30 AM to 3:30 PM. Held at ABC. ABC Members register through ABC. Call 717-653-8106.

WE DO CUSTOMIZED TRAINING AT YOUR SITE OR OURS

NOTE: All of our prior newsletters are archived on our website under the "Contact Us" Tab



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