

Management Bulletin – Noise Exposure REP

“Earning a living should not come at the expense of hearing loss.”
-OSHA Acting Regional Administrator William Donovan

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On June 1, 2021, the Occupational Safety and Health Administration (OSHA) Region V office established a regional emphasis program (REP) focusing on occupational noise exposure in the workplace.¹ The initiative is meant to encourage employers to take steps to identify, reduce and eliminate hazards associated with exposure to high levels of noise. The REP comes in the wake of a recent study by the Bureau of Labor Statistics (BLS), which found that the national average hearing loss rate for all private manufacturing is 8.6 cases per 10,000 full time workers. In addition, the study found that over half of workers in production occupations did not use personal protective equipment to mitigate workplace noise exposure.²

In response to these alarming rates, OSHA Region V, which includes Illinois, Indiana, Michigan, Minnesota, Ohio and Wisconsin, has proposed to accomplish this REP through outreach and enforcement activities. The outreach proposed will include the following:

- Targeted presentations, speeches, meetings and/or training sessions with employers/stakeholders;
- Letters/mailings to employers, professional associations, local safety councils, apprenticeship programs, local hospitals and occupational health clinics;
- News releases through local newspapers, safety councils, and/or industrial hygiene organizations;
- Use of current social media methods;
- Leveraging existing partnerships and alliances; and
- Encourage the use of OSHA’s On-Site Consultation Program and compliance assistance resources.

The outreach, which began on June 1, 2021, will be followed by enforcement actions no sooner than three (3) months after OSHA’s initial outreach efforts began. Starting in August, manufacturing employers located in Region V with hearing loss rates higher than the national average can expect inspections of their workplace. The REP empowers OSHA to conduct inspections for all complaints and referrals in industries covered by the REP. In addition, OSHA will conduct inspections based on a randomized programmed inspection list, as prepared by the

¹ <https://www.dol.gov/sites/dolgov/files/OPA/newsreleases/2021/06/OSHA2021994NOISEREP.pdf>

² https://www.bls.gov/iif/oshwc/osh/os/snr08_00_2019.xlsx

National Office. All selected establishments, regardless of size, will be inspected. During those inspections, CSHOs will review OSHA 300 injury and illness logs; walk around the facility to obtain sound level meter readings; conduct full shift noise monitoring and issue citations for violations of 29 CFR 1910.95. As stated, the REP gives OSHA probable cause to the extent an employer has a hearing loss rate higher than the national average to enter the workplace and walk around the facility to take sound level meter readings. Of course, they will also cite employers for any other safety violations they observe during this walk around.

As always, our primary goal is to protect your employees. To that end, and in general, employers should ensure they are well informed about the requirements and expectations of OSHA. You need to be sure that you have evaluated any noise exposure for your employees. If you determine that you have noise exposures in excess of 85 dBA, you need to have in place a written hearing conservation program. If your employees are exposed to noise in excess of 90 dBA, you must have a written program in compliance with the requirements of OSHA Standard 1910.95. Feel free to contact MRCA [MICA] [NFBA] for further information and/or assistance should any specific questions regarding this REP arise.