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**American Industrial Hygiene Association  
Comments on a  
Hearing Conservation Program for Construction Workers**

July 19, 2004

The American Industrial Hygiene Association (AIHA) is appreciative of the Occupational Safety and Health Administration (OSHA) for the opportunity to participate in stakeholder meetings for discussions on reducing noise exposures and hearing loss of workers in the construction industry.

AIHA is aware that these meetings are a continuation of OSHA's information gathering process that began with an Advance Notice of Proposed Rulemaking on August 5, 2002.

While not able to participate in the stakeholder meetings with personal testimony, AIHA would like to provide OSHA and other participants with comments on the issue of hearing loss of workers in the construction industry. These comments were drafted and approved by the AIHA Noise and Construction Committees.

**COMMENTS**

- Construction environments are typically noisy due to a wide range of tasks and activities inherent to the industry. Many workers on construction sites are exposed to noise at levels likely to result in hearing loss, and hearing loss is common among long-term construction workers. OSHA should update and improve the regulation addressing hearing conservation on construction sites using consensus standards and demonstrated good practices.
  
- On-going efforts to produce equipment and strategies to reduce noise exposure related to construction activity should be supported and continue. We encourage OSHA to foster and encourage alliances among construction employers, trade groups, construction equipment manufacturers, and other parties to develop quieter equipment, tools, and processes.

**AIHA**

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- Noise exposure evaluation is essential. Hearing loss prevention efforts and regulations must be based on exposure and risk of hearing loss. Task-based and full-shift exposure assessment techniques both have merit and should be addressed in the standard. Exposure evaluation needs to be targeted at workers with potential for exposure above 85 dBA.
- Worker education is vital to prevent hearing loss. Training on noise hazards, appropriate self-protective behavior, proper use of hearing protection devices (HPD) and related hearing loss prevention issues should be provided to all construction workers.
- Good industrial hygiene practice dictates that we follow the traditional hierarchy of controls. Employers should manage noise hazards by exhausting efforts to substitute for and/or eliminate noise hazards; developing and employing engineering controls; providing warnings as to risk; and providing training and procedural/administrative controls before requiring the use of HPDs, which should be treated as the last line of defense.
- We encourage OSHA to look at worker exposure assessment/compliance methods similar to the Lead in Construction Standard and the draft Silica standard. In both of these cases, specific job tasks are listed along with specific protection that must be provided to the worker at the start of the job unless there are historical empirical data to show otherwise. The employer then has the option to use traditional IH exposure assessments to provide data demonstrating that a lower level of protection is adequate.
- Although engineering and administrative noise controls are the preferred strategy for exposure reduction, use of HPDs to prevent hearing loss on construction sites is often unavoidable. An effective HPD program must exhibit these characteristics.
  - HPDs must be readily available on the jobsite.
  - HPDs must be appropriate for the designated use. Because HPD use can be a barrier to essential auditory communication, HPDs must be selected based on exposure, task, and need.
  - Users must be trained on effective HPD use. All employees expected to use hearing protection devices should receive training on correct use and care.
  - The HPD selected for use must be well accepted by users and be comfortable.
- Determination of hearing ability has a role in hearing loss prevention efforts. Regular audiometric testing can be used to monitor long-term program effectiveness by assessing the effect of workplace noise on workers' hearing. Audiometric testing can also be an educational tool, providing the workers feedback as to the effectiveness of their current

hearing loss prevention actions, both on and off the job. Qualified persons following good practice must perform audiometric testing.

In many cases, the construction environment places obstacles in the way of effectively and efficiently utilizing audiometric testing (e.g. jobsite location and accessibility; high worker mobility - between employers and geographically). If OSHA decides on audiometric testing as part of the HCP standard, OSHA should also consider compliance alternatives for contractors when audiometric testing may have limited value. Washington State's Department of Labor and Industries regulation WAC-296-817-500 Options to Audiometric Testing is an example of an alternative that could be applicable to the construction industry.

- A means of evaluation is necessary to ensure that programs are meeting their desired goals. We encourage OSHA to consider including program evaluation elements in the standard.

The Noise and Construction Committees of the AIHA continue to work together to find common ground and establish the critical elements of effective hearing loss prevention in construction workers. These committees and the AIHA will be pleased to work with OSHA and other stakeholders on this important issue.