



CONTACT

To learn more about hearing conservation, reach out to your AEU Loss Control Manager.

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Courtesy of The American Equity Underwriters, Inc.



Executive Summary

This white paper outlines recommended hearing loss prevention practices for the maritime industry.

The purpose of an effective hearing loss prevention program is first to protect worker hearing. Next, comply with OSHA's Hearing Conservation Program. Third, mitigating hearing loss claims is also a purpose of implementing a hearing loss prevention program.

Post-job offer, prior to work screenings, also known as baseline hearing tests provide employers with an opportunity to identify persons with an existing hearing loss, ensure regulatory compliance, and establish baseline health data before exposure to occupational noise. It is important to conduct baseline audiograms before a worker could be exposed to high noise levels.

When implemented correctly, these programs help reduce injury rates, improve retention, and control long-term risk and cost exposures associated with high-risk work environments such as shipyards, docks, and marine operations.

Define the Problem (or lack thereof)

Certain work areas may exceed 85 dBA over a time-weighted average, which is the OSHA action level for noise. Noise sampling should be done in all areas of operations, production, and other areas of the facility. Companies may consider hiring a Certified Industrial Hygienist (CIH) to provide independent third-party results for work areas that exceed OSHA's action level. If the action level is exceeded, it is required to implement a Hearing Conservation Program. There could be areas of your workplace that do not produce injurious noise. These areas should be identified. It may be necessary to rotate workers in and out of high noise areas into low noise areas. This is an example of administrative control. A CIH can help create such a program if needed.

The Case for Screening

Employer Benefits

Implementing post-job offer, prework medical screening allows maritime employers to:

- Verify that employees can safely perform essential functions of the job.
- Show compliance with OSHA's Hearing Conservation Program found in 29 CFR 1910.95.
- Identify preexisting medical conditions such as hearing loss that could be aggravated by work activities.
- Reduce or mitigate costs of hearing loss claims.
- Improve productivity and morale through appropriate job placement.
- Reduce employee turnover by ensuring better initial job-fit.

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The Case for Screening (continued)

Employee Benefits

Employees benefit from post-offer screening because it:

- Confirms their physical readiness for assigned work.
- Promotes early detection of potential health issues.
- Supports long-term health by establishing baseline medical data.
- Causes additional damage to hearing to be stopped or slowed down.
- Encourages a culture of safety and proactive wellness.

Going Above OSHA Requirements

OSHA Considerations

A requirement in the Hearing Conservation Program is baseline and annual audiograms for workers exposed to noise greater than 85 dBA over an eight hour time weighted average. Time weighted average is the average daily exposure for workers exposed to noise. It normalizes noise exposure over a normal, eight hour work day. OSHA allows employers to wait up to six months before a baseline audiogram is completed. As mentioned previously, AEU recommends a policy of post-offer/prework baseline audiograms. Annual follow-up audiograms are required thereafter for employees exposed above this action level.

Follow-up Procedures

Audiogram follow-up procedures require annual audiograms to be compared to the baseline. If a standard threshold shift has occurred, employees should be informed, and certain procedures implemented, such as adjusting personal protective equipment, increasing noise abatement, additional employee training, etc.

Record Retention

According to OSHA and Department of Labor guidelines (29 CFR 1910.1020), employers must maintain medical records related to occupational noise exposure for at least 30 years from the date of the last entry.

OSHA requires that workplace noise sampling results be kept for at least two years after the sampling was completed. However, we recommend that sampling results also be kept for at least 30 years.

Data such as audiogram results and workplace noise sampling could be used to defend or mitigate future hearing loss claims.

Other Requirements

If noise levels reach 90 dBA over an eight hour time weighted average, the employer must implement feasible administrative controls and engineering controls. Documentation of implementing such controls is needed.

- Administrative Controls – restricting workers (especially those that have prior hearing loss) from entering noisy environments, rotating workers in and out of noisy environments, employee training programs, signage to identify high noise areas and required personal protective equipment, etc.
- Engineering Controls – mufflers on equipment, purchasing quieter equipment, sound-deadening panels, soundproof rooms, etc.
- Signage and other notices should be used to alert workers of high noise areas in the facility. Signs must state that hearing protection is required in the high noise areas.

A Certified Industrial Hygienist can advise on the type and capability of personal protective equipment. The Noise Reduction Rating on hearing protection must show adequate protection based on sound levels in the workplace. In some cases, two types of hearing protection should be used simultaneously. Employees must receive training on proper fit and use of personal protective equipment.