



THE NATIONAL HEARING CONSERVATION ASSOCIATION

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April 3, 1991

Mr. David M. Pritzker
Administrative Conference of the United States
2120 L Street, NW, Suite 500
Washington, DC 20037

Dear Mr. Pritzker:

Thank you for the opportunity to provide input to your project entitled Noise Control Alternatives and EPA's Responsibilities, as requested in your letter of February 28, 1991. We are pleased to observe a renewed interest in a federal noise control program and in EPA's involvement in such a program. The cessation of the federal government's involvement in this vital area through suspension of EPA activity with regard to the Noise Control Act of 1972 was truly unfortunate. Renewed activity in this area would provide tremendous benefits for the health and welfare of all Americans.

The National Hearing Conservation Association (NHCA) is a professional association composed of audiologists, physicians, industrial hygienists, engineers, occupational health nurses, equipment manufacturers, and others, all of whom are active in the field of industrial and military hearing conservation, as well as hearing conservation in the consumer, recreational, and non-occupational sectors, throughout the United States. We serve the noise-exposed industrial and military populations through consultation and direct service provision in the areas of noise exposure measurement, engineering and administrative control of noise exposure, audiometry, personal hearing protection, and education and training. As such, we are vitally concerned with the prevention of noise-induced hearing loss, not only in American workers, but in the general population as well.

Since most of our members and the leadership of NHCA did not interact with EPA's former Office of Noise Abatement and Control (ONAC) on a frequent basis during its existence, we will not comment on your request for information on ONAC's strengths and weaknesses. Rather, we would like to comment on what activities a revitalized ONAC (or similar office) in EPA should be involved in at the present time.

Our observations and comments are as follows:

- 1. Unquestionably, one of the most vital activities of the federal government with regard to noise abatement and control is the publication of research data regarding the effects of noise on hearing health and other aspects of human health. These publications are vitally important to the acoustical and to the general communities. Several publications of ONAC were extremely useful and influential, especially the documents "Criteria for Health and Welfare Effects of Noise" (1973), "Information on Levels of Environmental Noise Requisite to Protect Public Health and Welfare with an Adequate Margin of Safety" (1974), and "Occupational Hearing Loss-Workers Compensation

- 1. SUPPORT + PUBLICATION OF RESEARCH
2. NRR - updating misleading + essentially useless
3. Proliferation of recreational noise

under State and Federal Programs" (1979). Unfortunately, these documents are many years out of date and need to be revised or replicated. They constituted a valuable contribution to the protection of the public health, and this type of contribution needs to be continued under government supports.

2. Shortly after ONAC promulgated a hearing protector labeling regulation, ONAC's staff was virtually eliminated. However labeling itself was still required. In the subsequent decade it has become clear that although the NRR which is mandated by the regulation has grown in importance in the mind of those purchasing hearing protectors, the NRR is a misleading and essentially useless number for estimating hearing protector effectiveness. It does not accurately represent either the absolute attenuation provided by hearing protectors, nor the relative performance between devices. The labeling regulation must be revised so that a useful number appears on hearing protector packaging and so that the law is uniformly implemented and observed. ONAC must be provided the funds and staff to accomplish this goal.
3. Numerous research programs on the general health effects of noise exposure were abandoned when ONAC was terminated. These types of research programs are invaluable to the maintenance of the public health and welfare and need to be initiated again. A viable, active EPA office on noise affairs is a prerequisite to such programs.
4. At the time of cessation of ONAC in the early 1980s, an important longitudinal study of children's noise exposure levels and hearing levels was being conducted by the Fels Institute of Yellow Spring, Ohio. ONAC's termination forced the abandonment of this study; due to its longitudinal nature, none of the data which had been collected will be able to be used. This has prevented the accumulation of information which is vitally needed to better understand the hearing process of children and their susceptibility to damage by noise exposure. Renewed funding of ONAC and of research studies of this type is needed to further the health and welfare of American children.
5. At the time ONAC was terminated, EPA was sponsoring research on the cardiovascular effects of noise exposure by Ernest Peterson of the University of Miami and by Jaylan Turkkkan of Johns Hopkins University. The funding for both of these projects was discontinued, as was funding for the dissemination of the information obtained. This had a deleterious effect in that public education about this important effect of noise exposure has virtually ceased. A revived ONAC or similar office in EPA would assure continuation of this work.
6. EPA's programs in public education and information dissemination about the harmful effects of noise exposure ceased with the elimination of ONAC, ending the distribution of materials such as "Noise: A Health Problem," the Quiet Schools curriculum, "Think Quietly About Noise," and the ECHO program (which enabled local communities to obtain assistance from other communities in solving their noise problem). Such publications and programs had tremendous results in terms of community noise abatement, community education about noise, and public/private school noise education programs. No other agency or funding source picked up the slack when EPA abandoned its efforts. EPA once again needs to take the lead in public education about noise and its health effects.

7. When ONAC ceased operation, all of EPA's technical assistance programs to state and local community noise control agencies gradually ceased. Most of these agencies have vanished or are non-functioning. Without federal technical support and funding, they are unlikely to operate actively again. In effect, this means that no serious noise control efforts are being or will be made at the state or local level. The premise of the federal government at the time of ONAC's dissolution was that this would not happen. History has proven that this premise was erroneous. It is time for EPA to become active in this area again.
8. In recent years, the proliferation of recreational noise sources (such as personal radios, portable radio amplification systems, guns, loud vehicle engines and radios, etc.) has been enormous, reflecting the de-emphasis in public education and noise labeling activities on the part of EPA. As public health audiologists, physicians, nurses, and others, we are concerned that the hearing health of future generations of Americans is being seriously compromised. We urge EPA to once again exercise leadership in this important area of public health and welfare.
9. All of the above listed efforts at preventing noise-induced hearing loss and other noise-related health effects were assigned to EPA as a public responsibility by the Noise Control Act of 1972 and the Quiet Communities Act of 1978. By dissolving EPA's ONAC, the federal government effectively ceased its mandated prevention and education activities related to public noise exposure. Other agencies, such as the Department of Labor's Occupational Safety and Health Administration (OSHA) have not taken up the slack in enforcement and education activities due to restricted legal mandate and restricted appropriations. Additionally, prior to ONAC's termination, it had functioned as the coordinator of all federal noise control activities. ONAC's absence has allowed a vacuum to exist in this area. There has been little, if any, governmental stimulus of other noise-related agencies, such as OSHA, to do an effective job in the regulation and prevention of noise-induced hearing loss. The American public needs EPA to revive its role of coordinator and stimulus of federal noise control activities.

NHCA congratulates the Administrative Conference on its being selected to evaluate the need for a renewed federal noise program. It is a very positive step that EPA is reexamining its priorities and responsibilities in this important area of public health and welfare. We appreciate the opportunity to provide comments to the Administrative Conference. If additional information or clarification is needed, we would be pleased to provide it at your request.

Sincerely,



Andrew P. Stewart
President
National Hearing Conservation Association