NHCA Says OSHA Hearing Loss Criterion Too Lenient

The Occupational Safety and Health Administration (OSHA) criterion for recording hearing loss flies in the face of the recommendations of every competent professional organization in the field, according to the National Hearing Conservation Association (NHCA).

“The OSHA criterion does follow the recommendations of the National Association of Manufacturers and the American Iron and Steel Institute, both of which are trade groups not known for their scientific objectivity in the area of occupational health and safety,” said Andy Stewart, NHCA President.

An OSHA directive of June 4 said citations will be issued to employers who fail to record on the OSHA Form 209 work-related shifts in hearing levels averaging 25 dB or more. Under this criterion, a progressive noise-induced hearing loss might severely impair a worker’s hearing and yet never reach the 25 dB trigger level for recording the loss in the OSHA log.

The Form 200 is used by OSHA to target hazardous industries for inspection. It is also regarded as a general indicator of working conditions in a given plant or industry.

NHCA said that recording a work-related average change of 10 dB is more in keeping with the present noise standard and is more protective of workers. Some State OSHA programs already require employers to record average changes of 10 dB, but it is unknown whether this new policy will permit them to continue doing so. Other organizations which supported this level in the past are the American Speech-Language-Hearing Association and the American Industrial Hygiene Association (AIHA). AIHA published a position paper on this issue in the AIHA Journal in November, 1987.

“It’s interesting that the American Industrial Hygiene Association is composed largely of professionals from industry. Apparently neither OSHA nor the two trade associations are much interested in listening to the professionals on this issue,” said Andy Stewart, President of NHCA.

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 throughout the United States.