

Can You Hear Me Now?

By Beth S. Pollak

OSHA's new Forms 300 and 300A require employers to keep track of work-related hearing loss.

Work-related hearing loss has become a priority for the Occupational Safety and Health Administration (OSHA)—OSHA now asks employers to document work-related injuries and illnesses that cause hearing loss. The revised versions of OSHA's Log of Work-Related Injuries and Illnesses, Forms 300 and 300A, published in October 2003, include a column to list cases where hearing loss occurs.

"In the past, we didn't have a column for the employer to check if there was a hearing loss," said Dave Schmidt, a lead economist in OSHA's office of statistical analysis. "That got lumped in with repeated trauma cases as a result of hearing problems over time. OSHA lacked the knowledge of the extent of occupational hearing loss. This will help us analyze how effective our hearing-conservation program is."

Protection in the Fab Shop

Is hearing loss a problem in the structural steel fabrication and erection industries? It can be—if workers don't wear the correct protection when they should be wearing it, says Larry Kruth, Engineering and Safety Manager for Douglas Steel Fabricating Corporation in Lansing, MI. Kruth is also Chairman of AISC's Safety Committee, which advocates for loss prevention and control in the steel-fabricating industry by creating and distributing safety guidelines and educational resources, and loss-prevention procedures and manuals.

"There are some operations in fabrication that require hearing protection," he said. "Two important ones are when grinding and when chipping welds, but every shop is unique. For example, we have a shot-blast machine, a wheelabrater that uses metal shot to clean steel, and when it's on, anyone in that area of the shop is required to wear hearing protection."

Kruth says hearing protection can be important during erection as well. "There are times when you might be laying deck, and the deck saw makes a loud enough noise to require hearing protection. Tightening bolts can require hearing protection when using air-impact wrenches, although the electric wrenches used on TC bolts are quieter."

OSHA's noise standard, 1910.95, "Occupational Noise Exposure," requires that companies implement a mandatory, hearing-conservation program as part of their safety guidelines. "As indicated in Table G-16, "Permissible Noise Exposure," for any continuous noise above 90 decibels, you have to provide hearing protection if an employee is exposed to it for more than eight hours a day," said David Sailing, Manager of Operations for Zalk Josephs Fabricators of Stoughton, WI. "You have to implement a hearing-conservation program that uses personal protective equipment (PPE) such as earplugs or earmuffs. If the noise-level is really high, you need engineering fixes, like sound curtains."

Sailing says the air grinder in a fabrication shop can peak well above the 90-decibel mark, which can damage your hearing permanently. Arc air gouging and pounding pylons in the field before erection also can be hazardous to your hearing.

Annual Updates

Since 1972, OSHA has required employers to fill out the injury and illness logs on an ongoing basis. Injuries and illnesses must be recorded within seven calendar days of occurring. "If used correctly, the forms can give employers information about what types of injuries and illnesses are most prevalent in their workplace, so they can focus their safety and health training plans to reduce those injuries and illnesses," Schmidt said.

In order to measure changes in hearing ability, employers must test workers' hearing when they are hired, and follow-up annually. "We're required to do a baseline hearing test when you hire an employee," Sailing said. "You mark down what tones a worker is deaf on, and you must repeat the test every year."

He says some employees lose their hearing gradually, as a natural process of aging. But big shifts from year to year must be reported. "If OSHA sees a lot of hearing shifts, they know there's a problem in the facility. You also have to consider that some people go to rock concerts, crank up their stereos, and participate in recreational shooting—but don't wear hearing protection. It can be hard to filter that out when we provide the information to OSHA."

For three months annually, OSHA requires employers to post the Form 300A, which is a yearly summary of the company's injuries and illnesses. This allows employees to stay aware of potential hazards and injuries in their workplace. Completed forms must remain on file for a five-year period, so OSHA compliance officers and company employees can access them. "When compliance officers do inspections, the first thing they ask for is the form, so they can review the cases, and understand what kind of injuries are occurring and where they occur," Schmidt said. "We encourage employers to use it in the same manner."

OSHA collects annual injury/illness data based on the information from the logs that employers provide. The data is used for outreach and for targeting inspections. "1.4-million establishments are required to fill out the log annually," he said. "We send out the survey to about 80 percent of those. We calculate injury and illness rates, and we'll rank and focus our resources on the ones with the high rates. We provide outreach and consultation."

To make sure employers are providing accurate information, OSHA also audits 250-300 sites annually. "We review medical records, reconstruct the logs, and then compare the reconstruction data to the actual on-site information and record-keeping records," Schmidt said. "Each year, about 90 percent of companies participating maintain their records correctly."

For each case that the employer records on the OSHA 300, another form must also be completed, the Form 301, that mentions the nature and extent of injury, and breaks down the description into four categories: 1) the nature of the injury, 2) the body part injured, 3) the chemicals/equipment involved, and 4) how the injury occurred.

"On OSHA's web site, you can download the forms in Excel or pdf formats," Kruth said. "What's nice is that the Form 300 is electronically linked to Form 300A and Form 301, so if you fill out the 300 the way you're supposed to, the computer will fill in most of the rest for you, and you don't need to log everything by hand all the time."

To learn more about OSHA Forms 300, 300A and 301, or to download them, visit the "record keeping" page on OSHA's web site, www.osha.gov/recordkeeping/index.html. ★