**OSHA Issues Noise Regional Emphasis Enforcement Program**

**General Industry and Construction Both Affected**

OSHA has reissued a noise hazard regional emphasis program for Region VII. OSHA inspectors will be conducting targeted inspections for noise for certain NAICS categories in both general industry and construction. Even though this particular emphasis program is for Region VII (Kansas, Missouri, Iowa, and Nebraska), OSHA has noise-related regional emphasis programs in all states except for those that fall in the Western and Pacific Regions (9 and 10).

OSHA says it’s targeting workplaces with excessive noise levels in order to prevent permanent hearing loss. They say 22 million workers are working in hazardous noise levels and 53% do not wear hearing protection. In a NIOSH study, 52% of noise-exposed tested construction workers admitted to not wearing hearing protection, and 25% of tested workers had a hearing loss that affected their day-to-day activities. Hearing loss is an OSHA recordable injury. Even short-term exposures can cause ringing in the ears, reduced productivity and stress.

**Who Will Be Inspected?**

OSHA has made a list of the NAICS codes from both general industry and construction that they have found commonly have noise hazards. Data was gathered from a couple different sources. First, they looked at inspections conducted between 2018 and 2020 where there were citations for noise. They found the industries who had the most citations for these issues, and have sorted them from the most inspected group to the least inspected group. OSHA also created the State Workers Compensation Data Profile. This collected data of the NAICS groups that were reporting noise-related injuries and illnesses throught workers compensation cases within that same time period. These lists were combined to generate a master list of NAICS groups.

These are the NAICS groups that have been identified for the targeted inspections:

**GENERAL INDUSTRY NAICS**

2111: Electric Power Generation, Transmission and Distribution

3119: Other Food Manufacturing

3211: Sawmills and Wood Preservation

3219: Other Wood Product Manufacturing

3241: Petroleum and Coal Products Manufacturing

3261: Plastics Products Manufacturing

3315: Foundries

3323: Architectural and Structural Metals Manufacturing

3327: Machine Shops; Turned Product; and Screw, Nut and Bolt Manufacturing

3328: Coating, Engraving, Heat Treating and Allied Activities

3329: Other Fabricated Metal Product Manufacturing

3364: Aerospace Product and Parts Manufacturing

4239: Miscellaneous Durable Goods Merchant Wholesalers

4811: Scheduled Air Transportation

4922: Local Messengers and Local Delivery

**CONSTRUCTION NAICS**

2361: Residential Building Construction

2362: Nonresidential Building Construction

2372: Land Subdivision

2373: Highway, Street and Bridge Construction

2379: Other Heavy and Civil Engineering Construction

2382: Building Equipment Contractors

2383: Building Finishing Contractors

2389: Other Specialty Trade Contractors

**Inspections – What Will OSHA Look For?**

OSHA will start the inspection by reviewing programs and records, including your:

* OSHA 300 logs for threshold hearing shifts and other health hazards
* Noise sampling data, including past noise surveys that include sound level measurements
* Exposure Monitoring Program
* Hearing Conservation Program
* Hearing conservation training records
* Audiograms for the past 3 years
* Records in conjunction with access to employee exposure and medical records (1910.1020)
* Information on temporary workers so they can evaluate your program in relation to them
* Information on PPE provided and whether it’s voluntary or required and where
* Schematic diagram of your facility (for noise mapping) and departments where noise may be an issue
* Union representatives will be questioned on noise and hearing conservation efforts

**Inspectors Will Conduct Sampling**

From there, OSHA will conduct a walk around to observe your processes and find opportunities for noise mapping. They will take pictures of workers not wearing their hearing protection correctly, or those in noisy areas not wearing any protection at all. They will also interview workers in areas where there are greater than 80 dba of noise found.

Inspectors will conduct noise mapping with a sound meter and, depending on their findings, may need to conduct additional noise dosimetry on individual workers. OSHA instructions for their inspectors advises inspectors to try to do noise dosimetry the very first day they’re there, and to get the dosimeters on the workers as soon as possible. Only 6 or more hours are necessary to support a citation. Thus, they may want to do dosimetry immediately to get as many hours of data as possible. However, guidance also suggests they do the dosimetry on your second shift workers if the inspection gets started later in the day. If they need additional sampling in other areas, they will come back for additional follow-up sampling for full shifts on other days.

**Protect Your Company With Side-by-Side Sampling**

As an employer, it’s advisable that you conduct side-by-side sampling of any noise sampling or dosimetry OSHA is conducting. This means you would have someone conduct noise sampling alongside the inspector to assure that the samples collected are similar to what OSHA is collecting. You can also choose to put a dosimeter on the same employees to duplicate and check noise dosimetry. It’s your right as an employer to do this and may help in negotiations later if there are discrepancies between your results and those of OSHA’s.

**iSi Can Help You Prepare and Get Your Program in Order**

iSi can help you get your documentation in order in the event you are going to be inspected. This includes:

* Industrial hygiene audits and assessments to see where you stand with occupational health and exposure-related OSHA regulations
* Conducting noise mapping and dosimetry so you have your required records on file
* Developing Exposure Monitoring Programs
* Written Hearing Conservation Programs
* Hearing conservation training
* Audiograms for the past 3 years
* PPE evaluations
* Side-by-side noise sampling during inspections
* Safety professionals for to be onsite and assist during OSHA inspections

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