Noise Control: How to Plan for OSHA’s New Interpretation

Designing to achieve the desired reduction in noise without excessive capital cost and negative operational impact is often a delicate balance.

BY MIKE TAUBITZ

OSHA is making noise about noise and industrial employers need to be thinking about how they might retrofit plants as a result.

Industry has had nearly three decades of relative peace and quiet with its noise control programs. Since 1983, OSHA has typically not cited employers who deployed personal protective equipment and a hearing conservation program to address noise, rather than using engineering and administrative controls. The exceptions were for noise so loud that it borders on 100 dBA when the most effective hearing protection is used or in cases where the controls cost less than an effective hearing conservation program.

In practice, controls are usually more expensive, so citations for failure to use them have been rare. However, that could change.

Employers in construction and general industry are likely to have a new category of expenses — and potential OSHA citations — to worry about if the agency’s “proposed interpretation” on noise regulations goes into effect.

That’s because OSHA now proposes to interpret 29 CFR 1910.95(b)(1) and 1926.52(b) as written.

These sections of the two noise standards are almost identical. They say, “When employees are subjected to sound exceeding those listed [in tables within the standard], feasible administrative or engineering controls shall be utilized. If such controls fail to reduce sound levels within the levels of the tables, personal protective equipment . . . shall be provided and used to reduce sound levels within the levels of the table.”

The agency said administrative or engineering controls would be considered economically feasible “if they will not threaten the employer’s ability to remain in business or if the threat to viability results from the employer’s having failed to keep up with industry safety and health standards.”

Lessons from the Past

Old-timers who started their careers in the ‘70s will remember that OSHA and state agencies were particularly aggressive on noise control. Noise was a new challenge for industry with few easy solutions.

Industries such as automotive that frequently used
new machines and processes due to ongo-
ing model changes had the opportunity to
apply the hierarchy of controls on new ma-
chines. This opportunity often afforded fea-
sible and significant improvements. When
companies had engineers include require-
ments for noise reduction in bid specifica-
tions, it opened the door to get the "biggest bang
for the buck." 

Notice the term "noise reduction" and
compare it with "noise control." Reduction
includes elimination or substitution, which
is typically feasible only in the concept and
design stages of procurement. If the op-
portunity to try new tooling or processes
is missed, all work done after the order is
placed becomes extra cost and retrofit. For
many, the integration of noise along with
other hazard eliminations and controls in
the design and procurement process was
the seed for the ideas of safety through de-
toration in noise without excessive capital cost
abatement that did not pose a fire hazard
levels "add" due to multiple noise sources, and the problem begins to
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