



APPENDIX J. HEARING PROTECTION SAFETY PROGRAM SEPTEMBER 2023

Purpose

To educate VSC Fire & Security, Inc. (hereinafter "VSC") employees on the effects of noise exposure where sound levels exceed those shown in the following table, and provide solutions for protection against the known hazard. Protection will be afforded through the issuance of appropriate Personal Protection Equipment (PPE), at no cost to the employee.

| Permissible Noise Exposures* | |
|------------------------------|-------------------------------|
| Duration per day, hours | Sound level dBA slow response |
| 8 | 90 |
| 6 | 92 |
| 4 | 95 |
| 3 | 97 |
| 2 | 100 |
| 1 1/2 | 102 |
| 1 | 105 |
| 1/2 | 110 |
| 1/4 or less | 115 |

Source: 29 CFR 1910.95(b)(2) & 1926.52(d)(1)

*When the daily noise exposure is composed of two or more periods of noise exposure of different levels, their combined effect should be considered, rather than the individual effect of each.

PPE

Where it is not feasible to reduce the noise levels or duration of exposures as specified in the Table above, ear protective devices will be provided by VSC and will be used by the employee. Ear protective devices inserted in the ear shall be fitted or determined individually by competent persons. Plain cotton is not to be considered a protective device.

Regulatory Scope

This procedure addresses regulatory requirements under 29 CFR 1926.52, 1926.101 and 29 CFR 1910.95. VSC will fully comply with the cited OSHA standards and with a customer's industrial or manufacturing facility hearing protection requirements when performing services on that customer's property.

General Requirements

VSC will be responsible for implementing engineering methods, administrative controls, and providing personal hearing protection (PPE) to ensure that employees are not exposed to noise exposures which exceed 85 dBA for an 8-hour time-weighted average sound level (TWA).

Hearing protection is required at no cost to the employee when employees are working in or around an extreme noise environment, defined as above 85 decibels. For example, a normal conversation is roughly 65 decibels; an electric handsaw generates approximately 90 decibels.

The following exhibit presents a list of other common exposures VSC employees may encounter on jobsites:

| | DECIBEL - dB(A) | EQUIPMENT |
|---|-----------------|--------------------------------|
| Double protection recommended above 105 dB(A) | 112 | Pile driver |
| | 110 | Air arcing gouging |
| | 108 | Impact wrench |
| | 107 | Bulldozer - no muffle |
| | 102-104 | Air grinder |
| | 102 | Crane - uninsulated cab |
| | 101-103 | Bulldozer - no cab |
| | 97 | Chipping concrete |
| | 96 | Circular saw and hammering |
| | 96 | Jack hammer |
| Hearing protection recommended above 85 dB(A) | 96 | Quick-cut saw |
| | 95 | Masonry saw |
| | 94 | Compactor - no cab |
| | 90 | Crane - insulated cab |
| | 87 | Loader/backhoe - insulated cab |
| | 86 | Grinder |
| | 85-90 | Welding machine |
| | 85 | Bulldozer - insulated cab |
| | 60-70 | Speaking voice |

Table 1: Some typical noise levels found on construction sites

No employee will be exposed to continuous noise in excess of 115 dBA for any length of time.

No employee will be exposed to impulsive or impact noises (such as those generated by a shear, punch press, etc.) exceeding 140 dBA peak sound pressure level.

Responsibilities of Management:

- Implement engineering and administrative controls to limit employee exposure.
- Provide adequate hearing protection for employees when needed.
- Post signs and warnings for all high noise areas.
- Conduct noise surveys when noise levels are in question.

Employees are responsible for:

- Using company provided and approved hearing protection in designated high noise areas or when performing identified high noise tasks.
- Requesting new hearing protection when needed.
- Exercising proper care of issued hearing protection.
- Not sharing or exchanging hearing protection with other individuals.

Training

VSC will provide hearing protection training to all employees whose job exposes them to noise levels exceeding the 8-hour time-weighted average of 85 decibels. This training will be administered at the time of hire, when there are changes in protective equipment or work processes, and annually thereafter. The Training consists of:

- The physical properties of noise.
- The effects of excessive noise on the ear.
- The purpose of hearing protection.
- Instructions on selection, fitting, use and care of hearing protection.

Any employee who does not comply with this training will be subject to discipline, up to and including termination of employment.

Recordkeeping:

VSC's Risk and Safety Department (hereinafter "Risk-Safety") will maintain training records with respect to this Hearing Protection Safety Program. Records will include: employee name, training topic-to include course content, date of training, certification (where applicable), and date of future training to maintain certification.

Equipment/Noise Controls - Engineering Controls

For non-standard jobs, at the request of an employee, or at management's discretion, VSC will conduct a specific hearing protection focused Job Hazard Analysis (JHA) to determine if noise exposures are above 85 decibels. If the noise level exceeds 85 decibels, engineering controls will be implemented to reduce the indicated noise exposure. If the engineering controls are not successful, the appropriate PPE will be determined and issued to the employee.

Note: For standard VSC installation, service, or inspection jobs employees are not exposed to processes or tasks that meet the 85 dbL 8 hour TWA which would mandate implementation of a hearing conservation program. When noise levels in the workplace exceed this benchmark it is driven by the jobsite environment in which the VSC employee is working.

Use of Hearing Protection

All employees of VSC will wear the prescribed hearing protection while working in or traveling through an area that is designated a High Noise Area. This would exclude offices, break rooms, and restroom facilities which are located in the high noise area, but have engineering controls in place to reduce the noise level below the protection threshold.

