

## NHCA Develops Position on Mining Regulations

The Federal Register of Monday, December 9, 1989 requested that interested parties submit comments and information regarding the proposed revision in the Mine Safety and Health Administration standards to reduce the incidence of noise-induced hearing loss among miners.

The NHCA responded to this request for comments by submitting a six page document of information. The full document is available to NHCA members by request from Michele at National headquarters.

Specific areas of comments included Definition of a Problem; Hazard Assessment; Exposure Monitoring; Methods of Compliance; Hearing Conservation Program; Hearing Protection Devices; and Recordkeeping.

### Under Definition of Problem,

NHCA recommended that one standard be adopted for all types of mining operations. Standard threshold shift was defined as an average change in hearing of 10 dB at the frequencies of 2000, 3000, and 4000 Hz, and STS was deemed recordable according to guidelines previously developed by the NHCA (see *Spectrum*, Spring, 1990).

The **Hazard Assessment** section suggests a permissible exposure limit (PEL) of 90 dBA with an 85 dBA "action level." **The exchange rate recommended is 3 dB as it is the most technically accurate method of noise measurement.** NHCA also suggests that impulse/impact noise be included in MSHA noise exposure calculations as impact noise is a significant, routine source of noise exposure in mining operations.

The **Exposure Monitoring** section suggests performance requirements (*what* must be accomplished, not *how* it is accomplished). NHCA recommends that MSHA specify permissible exposure in terms of 40-hr. equivalent exposures instead of daily 8-hr. exposures. Calibration of noise monitoring equipment is recommended annually by the manufacturer, and daily before and after sampling.

A combined approach of engineering methods and hearing protective devices is recommended in the **Methods of Compliance** section.

The **Hearing Conservation Program** section contains many of the same recommendations set forth in the OSHA Hearing Conservation Amendment. In addition, however, it is recommended that MSHA develop clear guidelines for baseline revision



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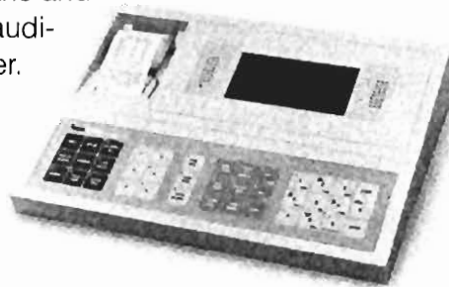
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### Mining

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in order to produce uniform results and data from the hearing conservation programs. Also recommended is the eventual development of procedures for the evaluation of effectiveness of the hearing conservation program. Of particular interest is the development of ANSI 12.13.

NHCA recommends that **Hearing Protective Devices** not be limited to one style, specifically recommending two

plug styles and one muff style. For evaluation of field performance of the HPD, NHCA recommends reducing the noise reduction rating by 50%.

The following records are suggested to be maintained under the **Recordkeeping** section: sound survey measurements, calibration records for noise survey equipment, audiometric tests, audiometer calibration records, and background sound pressure levels for audiometric test rooms. Record retention periods are suggested to be the same as those required in OSHA, but it is

*News from CAOHC continued from previous page.*

4. Use of videotapes in OHC courses - One CD contacted the CAOHC office to ask if it is permissible to represent one or two of the required disciplines in the OHC course on videotape. After a lengthy discussion, the Council voted not to allow the use of videotapes to replace an instructor. However, video tapes and other audio/visual materials are suggested to augment or serve as supplementary teaching materials.

5. Quality control of OHC courses - A concern was expressed that the CAOHC Council acts reactively rather than proactively in regard to the quality of OHC courses. It was suggested that we ask CDs to send the CAOHC office the addresses of the students. CAOHC staff will then send a self-mailer questionnaire to each student. A Council member will develop the questionnaire with assistance from CAOHC staff.

More information on these and other topics will appear in both the CAOHC *Update* and in *Spectrum*. NHCA members who serve on the CAOHC Council are Col. Rod Atack, Lt. Col. John Elmore, Rena Glaser, Richard Kowalski, Jeff Morrill, Dr. Barbara Panhorst, and Andy Stewart. Feel free to contact any of one of these with your questions about CAOHC. ■

noted that it is unlikely that a responsible employer would want to destroy these records in the time frames permitted by OSHA.

The deadline for submitting comments to MSHA was June 22, 1990. Again, if you have an interest in seeing the full document that was submitted, you may request a copy from NHCA headquarters at 515/266-2189. We will keep you informed as to the status of development of this regulation. ■