



## Please Don't Miss the Forest for the Trees

The original intent of requiring identification of a 10 dB Standard Threshold Shift (STS) as mandated by 29 CFR 1910.95 (The Occupational Noise Standard) was and remains two-fold: **A 10 dB STS may be an early indicator of noise-induced etiology for which actionable intervention (e.g. mandated use of hearing protection, review of engineering controls, administrative controls, etc.) is activated. A 10 dB STS may suggest underlying pathology.**

For many safety supervisors, performance review and salary structure is directly tied to Recordable (log) activity; resultantly the retesting of 10 dB STS events often receives lesser priority and is overlooked.

While potential Recordable events should indeed be retested, do not lose sight of the fact that *the issue of Recordability is a political, legal, and recordkeeping compliance issue and not the vehicle to rely upon to make early identification of noise-induced hearing loss.*

T K Group suggests that all 10 dB STS events be retested not only to be proactive but also because many confirmed 10 dB shift patterns point to potential underlying pathology in need of timely (medical) referral.

This author recently fielded a telephone call from a client who had recently received a visit from an OSHA inspector. The OSHA inspector suggested to the client that Individual

Test Summaries (i.e. hearing threshold levels) included too much information-specifically that only the thresholds at 2000, 3000, and 4000 Hz needed to be presented and reviewed. T K Group provides complete audiometric review as mandated in CFR 1910.05 (g)(7)(iii) to state: "The audiologist, otolaryngologist, or physician shall review problem audiograms and shall determine whether there is a need for further evaluation".

Audiologic dysfunction (whether occupationally related or not), is not limited to the 2000, 3000, and 4000 Hz frequency range

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