

The THRESHOLD

A T K GROUP PUBLICATION DEVOTED TO OCCUPATIONAL HEARING LOSS PREVENTION AND PROGRAM MANAGEMENT

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We are conducting a
certification/re-
certification class in
January 2015. Dates
to be later
announced.

SPECIAL EDITION

With best wishes, T K Group is losing two wonderful people to retirement in August: Beth Minnick and Charlie Russell.

Beth Minnick, Director of Operations since the evolution of our company, has been a tireless supporter not only to our office staff but to you, the client. Beth was the first hired employee at T K Group and worked tirelessly in excess of 32 years.

Her void will be replaced by two most capable people. **Chris Bennett** will manage Mobile Operations and **Barbara Taft** will manage Scheduling.

Charlie Russell began his career with HCNC under Dr. Joseph Sataloff. Charlie consulted T K Group for years and officially joined T K Group in 2001. Charlie, in his career conducted over 200 CAOHC courses, over 2000 on-site Hearing Loss Prevention Program evaluations, and in excess of 3200 audiometer calibrations.

Replacing many of his duties are **Chad Glowinski** and **Devin Welsh**.

T K Group will miss the valuable experience and expertise for which both of these outstanding individuals gave to T K Group. We wish both a happy retirement.

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Retrospective Work Relatedness Determinations

Recently, T K Group has been seeing many clients waiting in excess of a year to request Work Relatedness Determinations for past potentially OSHA Recordable hearing loss events. For example, Joe Employee sustains a Recordable shift in 2013, he is not retested, and he shows shift persistency in 2014. *As long* as he was posted to the OSHA 300 Log in 2013, a retrospective determination in 2014 is perfectly acceptable.

CFR 1904 (Recording Occupational Illnesses and Injuries) requires that you post OSHA Recordable hearing loss events to the OSHA 300 Log no later than 7 calendar days after receiving official notification of that shift event. You are not, however, required to post that event to the OSHA log if a retest will be attempted within 30 days of the initial shift event.

While OSHA's official stance is that the 7 calendar day posting window begins on the date of the confirming retest, companies that rely on a vendor for analysis do not have immediate analysis on the day of the retest and must wait a short period of time to receive a report (whether on paper, disk, or internet-based reporting) notifying them of a persistent shift event; as such, it is not unreasonable for applicable companies to consider the 7 calendar day period to initiate upon official notification of shift persistency. If, for example, you utilize our web-based reporting portal MYTK Group, the 7 day reporting window initiates once you read the email notifying you that data is posted to the portal for your review.

While you may request a Work Relatedness Determination anytime after the shift event, it is best practice to submit an Extended Questionnaire (EQ) to T K Group immediately after official notification of shift persistency.

If you opt not to obtain a retest or for whatever reason a scheduled retest was not obtained, it is best practice to submit an EQ no later than a month after the initial shift event; in such cases, be sure that you entered the event to the OSHA 300 Log within 37 days of the date of the initial shift event. If the shift event is later deemed non-occupationally related by determination, you may then line that event off the log.

What you do not want to do, however, is fail to post a potentially Recordable event to the log and/or request a determination of the event months and months later.

Single Day Exposure To 85 dB 8 Hr. TWA Requires Inclusion To The HLPP

In a 2004 Interpretation, OSHA affirmed that workers with even one exposure to 85 dB (8 hour TWA) in a year's time fall under the noise regulation and thus must be included in the HLPP. If a worker goes an entire year without one single 85 dB exposure, that worker may be removed from the HLPP.

If such "occasionally exposed" workers sustain a 10 dB Standard Threshold Shift (STS), they must still receive all necessary and mandated follow-up actions associated with CFR 1910.95 (i.e. 21-day written notification of the shift event, supplemental Hearing Loss Prevention training, hearing protector check/refit, and mandatory use of hearing protection). Similarly, workers in this noise exposure classification require determination of work relatedness if the 10 dB STS reaches a potentially Recordable level of loss as defined by CFR 1904.

While cost concerns confront all corporations these days, inclusion of all employees to a HLPP is beneficial on many levels.

Annual testing to non-noise exposed employees may identify non-noise related pathologies. Additionally, HLPP inclusion of non-noise exposed employees helps to reinforce the significance of the HLPP in the minds of those that are noise exposed.

Lastly, many non-noise exposed persons participate in noisy activities off the job and annual Hearing Loss Prevention Training certainly may prevent non-work related noise induced hearing loss.

If you are new to T K Group, or if you are simply interested in receiving email notification of new newsletter postings, please email robertwilliams@tkontheweb.com and type "Add to Newsletter" in the subject line.

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