



*Your Essential
Connection*

March 26, 2007

The Honorable Edwin G. Foulke, Jr.
Assistant Secretary of Labor
Occupational Safety and Health Administration
U.S. Department of Labor
200 Constitution Avenue, NW
Washington, DC 20210

Dear Assistant Secretary Foulke:

One of the greatest challenges and concerns we now face in the United States is the hearing loss that is occurring in our workforce. Over 30 million workers are exposed to hazardous levels of noise, and noise-induced hearing loss is one of the most common occupational diseases. Such hearing loss significantly affects the ability to communicate and negatively impacts a worker's quality of life.

The American Industrial Hygiene Association (AIHA) believes we cannot wait any longer to address this issue and encourages the Occupational Safety and Health Administration (OSHA) to take immediate action to lower the Permissible Exposure Limit (PEL) for occupational noise exposure to 85 dBA (as an 8-hour TWA) and to adopt the 3 dB exchange rate. AIHA strongly believes the 85 dBA limit and 3 dB exchange rates are appropriate for both the General Industry and Construction standards.

AIHA has supported this position for some time through the work of the AIHA Noise Committee. This committee provides health and safety professionals, the industry, and the community a forum for disseminating and exchanging ideas and information about the effects of exposure to noise and vibration, the control thereof, and methods of hearing conservation.

Review of the damage risk estimation upon which the current regulation is based indicates that even a currently compliant hearing conservation program – that is, one where workers are exposed up to 90 dBA TWA with no hearing protection – will yield up to 26% excess risk of material hearing impairment over the course of a working lifetime. It is unimaginable that any other regulated hazard would permit 20-30% of the exposed population to have material impairment. Lowering the PEL to 85 dBA would reduce the number of workers at risk by at least one-half.

Many agencies and organizations in the U.S. have adopted an occupational exposure limit of 85 dBA, with a 3 dB exchange rate. Both the National Institute for Occupational Safety and Health (NIOSH) and the American Conference of Governmental Industrial Hygienists (ACGIH) have

AIHA

*Your Essential Connection:
Advancing Occupational and Environmental Health
and Safety Globally*

2700 Prosperity Ave., Suite 250, Fairfax, VA 22031 U.S.A.
703-849-8888; Fax 703-207-7266; www.aiha.org

long recommended such exposure limits. The U.S. Department of Defense (DOD) and all three branches of the military use the 85 dBA exposure limit. In addition, DOD endorses the use of the 3 dB exchange rate; the Army and Air Force have adopted this rate, and the Navy is in the process of adopting it.

The vast majority of the nations of the world regulate workers' noise exposures at lower levels than the U.S. In fact, the U.S. is one of only two nations that still uses the 90 dBA PEL and is one of three nations that uses the 5 dB exchange rate. As a result, American workers are allowed exposure to noise levels that would result in more hearing loss than the rest of the world.

Lowering the PEL to 85 dBA may also streamline management of hearing conservation programs by adopting a single threshold trigger for all hearing loss prevention activity such as engineering controls, training, hearing protection, and hearing conservation programs.

AIHA urges OSHA to take immediate action on this issue to ensure that American workers are afforded the same level of protection from hazardous noise that the majority of the world's nations, and our own military, provide their workers. Technical background for our position is reflected in a position paper on the regulation of occupational noise exposure written by Dr. Alice Suter in December 2006 for the Hearing Protection Group of the International Safety Equipment Association (ISEA). AIHA would be more than happy to forward a copy of this position paper if you feel there is need to review additional background on the issue.

Founded in 1939, AIHA is the premier association of occupational and environmental health and safety professionals. AIHA members represent a cross-section of industry, private business, labor, academia, and government. The AIHA Noise Committee is but one of more than 30 technical committees that deal with the health and safety challenges facing workers and occupational health and safety experts everywhere.

Thank you for your consideration of this request and your continuing efforts to address this important issue. Please contact me should you have any questions.

Sincerely,

(signature)

Frank M Renshaw

Frank M Renshaw, PhD, CIH, CSP
President

cc: AIHA Board of Directors
Laurel Davis, AIHA Noise Committee Chair
Steven Davis, AIHA Executive Director
Aaron Trippler, AIHA Director Government Affairs