



<b>HEARING CONSERVATION PROGRAM</b>	<b>Procedure Number</b> <b>SAF-1.38</b>
	<b>Issue Date</b> September 11, 2019
<b>SAFETY</b>	<b>Revision Date</b> August 29, 2025
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<b>ISSUED BY:</b>   Environmental, Health & Safety (EH&S) Manager Coosa Pines Operations	<b>APPROVED BY:</b>   General Manager Coosa Pines Operations
August 29, 2025 DATE	August 29, 2025 DATE
INTERPRETATION AND PERIODIC REVIEW OF THIS PROCEDURE IS THE RESPONSIBILITY OF:  <b>EH&amp;S MANAGER</b>	
<b>DISTRIBUTION</b>  ALL MANAGERS ALL TEAM LEADERS ALL EMPLOYEES COOSA PORTAL COOSA CONTRACTOR WEBSITE	

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## 1.0 PURPOSE

The purpose of this policy is to ensure that the Coosa Pines Operations establishes a written policy for hearing conservation and is designed to protect employees from the effects of exposure to excessive noise in compliance with the Occupational Safety and Health Administration Occupational Noise Exposure Standard 29 CFR 1910.95 (General Industry).

## 2.0 SCOPE

This policy applies to all Coosa Pines employees.

## 3.0 RESPONSIBILITIES

### 3.1 EH&S Manager

- 3.1.1 Responsible for administering the hearing conservation program.
- 3.1.2 Responsible to monitor noise via sound level measurements or dosimetry in order to determine employee exposure to noise.
- 3.1.3 Oversees administering the audiometric testing program.
- 3.1.4 Provides annual training for employees.
- 3.1.5 Notifies employees of noise monitoring and audiometric testing results.
- 3.1.6 Maintains noise exposure monitoring, audiometric testing, and training records.
- 3.1.7 Reviews the effectiveness of the hearing conservation program and ensures that it satisfies the requirements of applicable Federal hearing conservation requirements.

### 3.2 Management (along with the EH&S Manager)

- 3.2.1 Enforces the use of hearing protection by employees.
- 3.2.2 Ensures that the hearing protectors are in good condition and are fitted and used correctly.
- 3.2.3 Ensures that hearing protectors provide adequate attenuation [i.e., the Noise Reduction Rating (NRR) is adequate].
- 3.2.4 Enforces administrative and engineering controls within the facility to reduce employee noise exposure.
- 3.2.5 Operations Management shall notify the EH&S Manager of new equipment installations or process changes that may affect noise levels so monitoring can be performed.

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### 3.3 Employees

- 3.3.1 Responsible to properly wear appropriate hearing protection in work areas as required (see Attachment 1 – 2018 Sound Mapping results).
- 3.3.2 Is knowledgeable of and understands the consequences associated with failure to follow company policy concerning the proper use of hearing protection.
- 3.3.3 Responsible for proper care of hearing protection including proper use, routine care and cleaning, and replacement as required.
- 3.3.4 Responsible to attend scheduled hearing evaluations.

## 4.0 NOISE MONITORING AND NOISE CONTROL

- 4.1 A noise survey will be conducted triennially. However, if significant changes in production processes, equipment or controls occur between the triennial surveys, additional monitoring shall be done to determine if additional employees may be exposed at or above the Action Level, and to determine the adequacy of hearing protection being used by employees.
- 4.2 The Action Level is defined as an 8-hour time-weighted average noise exposure level of 85 dBA time-weighted average (TWA). The Permissible Exposure Level (PEL) is defined as a noise exposure level of 90 dBA TWA. A time-weighted average (TWA) is the average of an employee's noise exposure received over an 8-hour period.
- 4.3 The instruments used to conduct the monitoring shall be Type 1 or Type 2 instruments capable of providing A-weighted, slow-response measures. Instrument calibration will be checked both before and after measurement.
- 4.4 The purpose of noise monitoring is not only to determine sound pressure levels at various locations (dBA SPL), but also to accurately and realistically measure overall employee noise exposure levels, i.e. - Time Weighted Averages (dBA TWA). Obtaining both types of measures will provide the basis for good hearing conservation policy decisions. Area readings with a sound level meter will be used to measure dBA SPL at various locations. In addition, area readings with a sound level meter can reliably be used to estimate dBA TWA when worker mobility is limited, variations in sound pressure levels are minimal, and impulse noise is not a significant component of the overall exposure. When these conditions cannot be met, representative employee noise exposure levels (dBA TWA) will be measured using personal noise dosimeters.
- 4.5 When noise exposure levels exceed the PEL of 90 dBA TWA, feasible engineering and/or administrative controls will be investigated and then implemented to reduce employee noise exposure levels to or below the PEL when possible.
- 4.6 All employees exposed at or above the Action Level of 85 dBA TWA shall be notified of the results of the noise monitoring.

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## 5.0 HEARING PROTECTION POLICY

- 5.1 All employees exposed at or above the Action Level will wear only hearing protection approved by Coosa Pines Operations.
- 5.2 Coosa Pines Operation will provide appropriate hearing protection at no cost to the employee and replace this hearing protection as necessary and appropriate.
- 5.3 Coosa Pines Operation will provide training in the use and care of the hearing protectors.
- 5.4 Coosa Pines Operation approved hearing protectors shall reduce the employee's noise exposure to no more than 85 dBA TWA.

## 6.0 AUDIOMETRIC TESTING

- 6.1 The purpose of audiometric testing is to determine each employee's hearing threshold by determining the employee's response to noise at several frequencies. A baseline audiogram will be conducted within one year of an employee's date of hire.
- 6.2 The initial audiogram will be used as a baseline measurement to which all subsequent audiograms will be compared. Audiometric testing will be completed annually for all employees whose exposures equal or exceed an 8-hour TWA of 85 dBA.
- 6.3 Audiometric testing will be performed by a contracted and accredited audiometric testing company.
- 6.4 The audiometric testing will be performed at no cost to the employee.
- 6.5 The annual audiogram will be compared to the baseline audiogram to determine if the audiogram is valid and if a standard threshold shift (STS) has occurred. A STS is defined as the average hearing loss of 10 dB or more at the tested frequencies of 2,000, 3,000 and 4,000 Hz in either ear, relative to the baseline audiogram.
- 6.6 If an STS is identified, the following steps will be taken:
  - 6.6.1 Employees will be notified of the results in writing within 21 days of the determination.
  - 6.6.2 Employees will be retrained in the proper use of hearing protection. If deemed appropriate, hearing protection offering greater noise reduction will be provided to the affected employees.
  - 6.6.3 An employee may be referred for a clinical audiological evaluation or an Otological examination for additional testing.

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- 6.6.4 The EH&S Manager, along with management, will review the effectiveness of any engineering and administrative controls to identify and correct any deficiencies.
- 6.6.5 Evaluation of the results of the audiograms will be performed by the testing agency (either the designated medical provider or the contracted company). Coosa Pines Management will follow all recommendations made for each employee by the tester.
- 6.6.6 If the results of the audiogram demonstrate an STS, the company reserves the right to conduct a second audiogram within 30 days and consider these results as the annual audiogram.

## **7.0 ADMINISTRATIVE DUTIES**

- 7.1 The EH&S Manager or designee is responsible for oversight of this policy and applicable procedures. A copy of the procedure must be reviewed by employees of the Coosa Pines Operations. Implementation of this policy and applicable procedures is the responsibility of the site General Manager.

## **8.0 TRAINING**

- 8.1 Appropriate training, instruction and information will be provided to employees affected by this policy. Annual training includes but is not limited to:
  - 8.1.1 The effects of noise on the human ear and hearing.
  - 8.1.2 The purpose of hearing protection.
  - 8.1.3 The proper use and care of hearing protection (Attachment 2).
  - 8.1.4 The purpose and value of noise exposure monitoring and audiometric testing.

## **9.0 DOCUMENTATION/RECORDS**

- 9.1 Documentation:
  - 9.1.1 The EH&S Manager will maintain the original policy and any subsequent revisions with the latest version accessible through the Coosa Portal.
  - 9.1.2 The EH&S Manager will maintain records pertaining to the hearing conservation program in a confidential manner. Any requests for records should be directed to him/her. The EH&S Manager will maintain the following records:
    - Noise exposure monitoring results.
    - Audiometric testing records.

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9.2 Records:

- 9.2.1 The EH&S Manager is responsible for maintaining all applicable records per document control procedures and Federal guidelines.

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## 10.0 ATTACHMENTS

### ATTACHMENT 1 2018 SOUND MAPPING RESULTS

* Results from 2018 Sound Mapping			Noise Level with hearing protection that fits and is being worn correctly.							
Location	Floor	Highest DBA Recorded *	Skull Screws (32 nrr)	Howard Leight LL-30 (32 nrr)	Max Lite (30 Nrr)	Jazz Band 6506 (25 nrr)	Jetz Moldex (27 nrr)	3M Push-Ins (28 nrr)	Item No. 164247 Cabot (29 nrr)	3M EAR FX (33 nrr)
WoodYard	#2 T.Dump	110.2	85.2	85.2	87.2	92.2	90.2	89.2	88.2	84.2
CLO2:	4th	109.2	84.2	84.2	86.2	91.2	89.2	88.2	87.2	83.2
Recovery:	7th	106.6	81.6	81.6	83.6	88.6	86.6	85.6	84.6	80.6
PreCoat	Air Dryer	106.5	81.5	81.5	83.5	88.5	86.5	85.5	84.5	80.5
AOP	Outside	105.5	80.5	80.5	82.5	87.5	85.5	84.5	83.5	79.5
Recovery:	1st	103.2	78.2	78.2	80.2	85.2	83.2	82.2	81.2	77.2
Recovery:	3rd	102.2	77.2	77.2	79.2	84.2	82.2	81.2	80.2	76.2
Chiller	Ground	102.1	77.1	77.1	79.1	84.1	82.1	81.1	80.1	76.1
E Bleach:	2nd	101.6	76.6	76.6	78.6	83.6	81.6	80.6	79.6	75.6
TG7		101.1	76.1	76.1	78.1	83.1	81.1	80.1	79.1	75.1
Recovery:	2nd	100.8	75.8	75.8	77.8	82.8	80.8	79.8	78.8	74.8
WoodYard	Blower #1	99.7	74.7	74.7	76.7	81.7	79.7	78.7	77.7	73.7
DD Wash:	Bottom	98.6	73.6	73.6	75.6	80.6	78.6	77.6	76.6	72.6
D Bleach:	1st	96.8	71.8	71.8	73.8	78.8	76.8	75.8	74.8	70.8
E Bleach:	4th	96.7	71.7	71.7	73.7	78.7	76.7	75.7	74.7	70.7
WoodYard	Booster	96.7	71.7	71.7	73.7	78.7	76.7	75.7	74.7	70.7
East Digesters:	C. Valve	96.2	71.2	71.2	73.2	78.2	76.2	75.2	74.2	70.2
WoodYard	Inside Chip Vib.	96.1	71.1	71.1	73.1	78.1	76.1	75.1	74.1	70.1
West Digesters:	C. Valve	95.9	70.9	70.9	72.9	77.9	75.9	74.9	73.9	69.9
Recovery:	4th	95.8	70.8	70.8	72.8	77.8	75.8	74.8	73.8	69.8
Recovery:	Outside	95.7	70.7	70.7	72.7	77.7	75.7	74.7	73.7	69.7
DD Wash:	O	95.3	70.3	70.3	72.3	77.3	75.3	74.3	73.3	69.3
Recovery:	8th	95.3	70.3	70.3	72.3	77.3	75.3	74.3	73.3	69.3
D Bleach:	2nd	94.8	69.8	69.8	71.8	76.8	74.8	73.8	72.8	68.8
Ross:	Basement	94.8	69.8	69.8	71.8	76.8	74.8	73.8	72.8	68.8
Recovery:	5th	94.3	69.3	69.3	71.3	76.3	74.3	73.3	72.3	68.3
AOP	Inside	94.1	69.1	69.1	71.1	76.1	74.1	73.1	72.1	68.1
Lime Kiln	F-Deck	93.7	68.7	68.7	70.7	75.7	73.7	72.7	71.7	67.7
East Digesters:	Bottom	93.6	68.6	68.6	70.6	75.6	73.6	72.6	71.6	67.6
Ross:	Upstairs	93.2	68.2	68.2	70.2	75.2	73.2	72.2	71.2	67.2
Recovery:	9th	93.1	68.1	68.1	70.1	75.1	73.1	72.1	71.1	67.1
West Digesters:	Shuttle	92.9	67.9	67.9	69.9	74.9	72.9	71.9	70.9	66.9
CLO2:	1st	92.6	67.6	67.6	69.6	74.6	72.6	71.6	70.6	66.6
Filter Plan	Basement	92.3	67.3	67.3	69.3	74.3	72.3	71.3	70.3	66.3
Tank Farm	Methanol	92.1	67.1	67.1	69.1	74.1	72.1	71.1	70.1	66.1
WoodYard	Under Chip Bin	92.1	67.1	67.1	69.1	74.1	72.1	71.1	70.1	66.1
E Bleach:	Bottom	91.7	66.7	66.7	68.7	73.7	71.7	70.7	69.7	65.7
CLO2:	3nd	91.4	66.4	66.4	68.4	73.4	71.4	70.4	69.4	65.4
East Digesters:	Grated	91.2	66.2	66.2	68.2	73.2	71.2	70.2	69.2	65.2
Tank Farm	CLO2	90.9	65.9	65.9	67.9	72.9	70.9	69.9	68.9	64.9
CLO2:	2nd	89.2	64.2	64.2	66.2	71.2	69.2	68.2	67.2	63.2
West Digesters:	Bottom	88.8	63.8	63.8	65.8	70.8	68.8	67.8	66.8	62.8
East Digesters:	Shuttle	88.7	63.7	63.7	65.7	70.7	68.7	67.7	66.7	62.7
West Digesters:	Grated	86.4	61.4	61.4	63.4	68.4	66.4	65.4	64.4	60.4
Lime Kiln	Highest	84.4	59.4	59.4	61.4	66.4	64.4	63.4	62.4	58.4
D Bleach:	3rd	83.6	58.6	58.6	60.6	65.6	63.6	62.6	61.6	57.6
Recovery:	6th	82.6	57.6	57.6	59.6	64.6	62.6	61.6	60.6	56.6
E Bleach:	3rd	82.5	57.5	57.5	59.5	64.5	62.5	61.5	60.5	56.5
E Bleach:	6th	82.3	57.3	57.3	59.3	64.3	62.3	61.3	60.3	56.3
Tank Farm	Acid	79.7	54.7	54.7	56.7	61.7	59.7	58.7	57.7	53.7
E Bleach:	5th	79.3	54.3	54.3	56.3	61.3	59.3	58.3	57.3	53.3
West Digesters:	PES Room	77.9	52.9	52.9	54.9	59.9	57.9	56.9	55.9	51.9
Tank Farm	Chlorate	77.2	52.2	52.2	54.2	59.2	57.2	56.2	55.2	51.2


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## ATTACHMENT 2




### 1. Roll

the earplug up into a small, thin "snake" with your fingers. You can use one or both hands.



### 2. Pull

the top of your ear up and back with your opposite hand to straighten out your ear canal. The rolled-up earplug should slide right in.



### 3. Hold

the earplug in with your finger. Count to 20 or 30 out loud while waiting for the plug to expand and fill the ear canal. Your voice will sound muffled when the plug has made a good seal.

**Check the fit** when you're all done. Most of the foam body of the earplug should be within the ear canal. Try cupping your hands tightly over your ears. If sounds are much more muffled with your hands in place, the earplug may not be sealing properly. Take the earplug out and try again. (Source: NIOSH)



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### ATTACHMENT 3

The Limits for Permissible Noise Exposure, according to OSHA Standards, are shown in the table below. Short-term noise exposure should be limited to a level not greater than 115 dBA.

<b>Limits for Permissible Noise Exposure (According to OSHA)</b>	
8 hours	90 dB
6 hours	92 dB
4 hours	95 dB
3 hours	97 dB
2 hours	100 dB
1.5 hours	102 dB
1 hour	105 dB
30 minutes	110 dB
15 minutes	115 dB

### ATTACHMENT 4

#### Common Sounds

<b>Sound</b>	<b>Noise Level</b>
Chain Saw	110 decibels
Front-End Loader	90-95 decibels
Gunshot	140 decibels
Jackhammer	112 decibels
Lawn Mower	90-95 decibels
Tractor	95-105 decibels
Circular Saw	90-100 decibels
Pneumatic Drill	110 decibels
Noisy Restaurant	80 decibels
Impact Wrench	102 decibels
Forklift	87 decibels

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**ATTACHMENT 3  
RECORD OF REVISIONS**

<b>Section</b>	<b>Revision Number</b>	<b>Effective Date</b>	<b>Description Of Changes</b>
All	0	9/11/19	New issue.
All	1	10/31/22	General review and update of management signatures.
All	2	08/29/25	Periodic review, changed logo, changed Safety Manager to EH&S Manager, noise survey frequency changed from annually to triennially, other minor editorial changes, made PDF version searchable.