

HEARING CONSERVATION PROGRAM

Summit Metal Products (SAMPLE)

Summit Metal Products — Springfield Plant (Springfield, OH) · 2026

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PREPARED FOR

Summit Metal Products (SAMPLE)

Summit Metal Products — Springfield Plant (Springfield, OH)

Dana Whitfield, EHS Manager

Prepared to align with OSHA 29 CFR 1910.95 — Occupational Noise Exposure. Generated July 23, 2026 by Foster Special Instruments.

1. Purpose & Scope

This Hearing Conservation Program ("the Program") establishes Summit Metal Products (SAMPLE)'s written procedures for protecting the hearing of employees at Summit Metal Products — Springfield Plant (Springfield, OH), in compliance with OSHA's Occupational Noise Exposure standard, 29 CFR 1910.95.

The Program applies to all employees at Summit Metal Products — Springfield Plant whose noise exposure equals or exceeds an 8-hour time-weighted average (TWA) of 85 decibels (dBA), across 1st shift, 2nd shift. It covers noise monitoring, audiometric testing, hearing protection, training, recordkeeping, and program evaluation.

Summit Metal Products (SAMPLE) operates in the Metal stamping & fabrication industry, and this program is scaled for approximately 85 employees enrolled in hearing conservation.

2. Responsibilities

Dana Whitfield, EHS Manager, is designated as the Hearing Conservation Program Administrator for Summit Metal Products — Springfield Plant and is responsible for the overall implementation, monitoring, and maintenance of this Program.

The Program Administrator's responsibilities include: coordinating noise monitoring and audiometric testing, reviewing test results and STS determinations, ensuring required employee notifications are delivered, scheduling annual training, and maintaining program records.

Supervisors are responsible for enforcing hearing protector use in designated areas and reporting new or changed noise sources to the Program Administrator. Employees are responsible for wearing hearing protection as required, attending scheduled audiometric tests and training, and reporting hearing concerns.

3. Noise Monitoring

Noise monitoring has been performed at Summit Metal Products — Springfield Plant (most recently in 2025). Monitoring results are used to identify employees exposed at or above the 85 dBA time-weighted average (TWA) action level and to determine which employees are enrolled in this program.

Primary noise sources identified at Summit Metal Products — Springfield Plant: Stamping presses, pneumatic tools, industrial ventilation fans, and a metal shear line.

Monitoring will be repeated whenever a change in production, process, equipment, or controls is likely to increase noise exposure, and periodically thereafter to confirm exposures remain accurately characterized.

4. Audiometric Testing

Baseline audiograms are obtained for each newly enrolled employee within 6 months of their first exposure at or above the action level (within 1 year if a mobile testing van is used, provided hearing protectors are worn in the interim).

Annual audiograms are performed thereafter by Foster Special Instruments, and compared to each employee's baseline to identify a Standard Threshold Shift (STS) — an average shift of 10 dB or more at 2000, 3000, and 4000 Hz in either ear.

When an STS is identified: the employee is notified in writing within 21 days, refitted and retrained on hearing protectors, referred for further evaluation if a non-occupational cause is not identified, and required to wear hearing protection if not already enrolled in that requirement. A confirmed, persistent STS triggers a baseline revision.

5. Hearing Protection Devices

Summit Metal Products (SAMPLE) makes the following hearing protector types available to employees at Summit Metal Products — Springfield Plant at no cost: insert earplugs, earmuffs.

Employees select from at least one variety of protector suitable for their work conditions. Protectors are re-evaluated whenever noise exposures change, and Noise Reduction Rating (NRR) is considered — with a standard OSHA derating applied — to confirm attenuated exposure falls below 90 dBA TWA (85 dBA TWA where an STS has been identified).

Hearing protectors are mandatory for any employee with a measured STS, for employees exposed at or above 90 dBA TWA, and for any employee who has not yet had a baseline audiogram. All other enrolled employees may choose to wear protection voluntarily and are provided training on proper fit and use.

6. Employee Training

Training is provided to all enrolled employees at the time of initial enrollment and annually thereafter, delivered via in-person, instructor-led sessions.

Per 29 CFR 1910.95(k), annual training covers: the effects of noise on hearing; the purpose, advantages, disadvantages, and attenuation of various hearing protector types; instructions on selection, fitting, use, and care of protectors; and the purpose and procedures of audiometric testing.

Training completion is documented and retained for each employee, and training content is reviewed annually to reflect any changes to noise sources or protection requirements at Summit Metal Products — Springfield Plant.

7. Recordkeeping

Noise exposure measurement records are retained for 30 years, per 29 CFR 1910.1020.

Audiometric test records are retained for the duration of the affected employee's employment, and include the employee's name and job classification, test date, examiner's name, date of the last acoustic or exhaustive calibration of the audiometer, and the employee's most recent noise exposure assessment.

Records are made available to employees, former employees, and their representatives on request, and to OSHA and NIOSH representatives as required by 29 CFR 1910.1020.

8. Program Evaluation

Dana Whitfield reviews this Program at least annually and following any STS, significant process change, or noise monitoring update, to confirm it continues to reflect actual conditions at Summit Metal Products — Springfield Plant.

Evaluation includes a review of audiometric trends across the enrolled population, effectiveness of hearing protector selection, training completion rates, and any recommendations from the reviewing audiologist or physician.

Audiometric Testing Schedule

Baseline audiogram: within 6 months of an employee's first exposure at or above the 85 dBA action level at Summit Metal Products — Springfield Plant; where mobile test vans are used, within 1 year of first exposure, provided employees wear hearing protectors for any period beyond 6 months until the baseline is obtained (29 CFR 1910.95(g)(5)(i)-(ii)).

Annual audiogram: audiograms are repeated annually thereafter, performed by Foster Special Instruments, for each of the approximately 85 enrolled employees across 1st shift, 2nd shift.

Test scheduling window: Dana Whitfield coordinates testing dates by shift so employees on 1st shift, 2nd shift are tested without disrupting production, and confirms each employee has had at least 14 hours away from workplace noise (or has worn hearing protectors during that period) before a baseline test.

Retest trigger: any audiogram showing a possible Standard Threshold Shift (STS) is followed by confirmation procedures under this Program's STS Follow-Up Procedure before the employee is formally notified.

STS Follow-Up Procedure

1. Confirm the STS. When an annual or periodic audiogram shows an average shift of 10 dB or more at 2000, 3000, and 4000 Hz in either ear relative to the employee's baseline, Dana Whitfield reviews the result to confirm it meets the Standard Threshold Shift (STS) definition under 29 CFR 1910.95(g)(10).
2. Notify the employee in writing within 21 days of the determination, per 29 CFR 1910.95(g)(8)(i).
3. Refit and retrain. Unless a physician determines the STS is not work related or aggravated by occupational noise exposure, the employee is refitted with existing hearing protectors and retrained in their use and care, and refitted with protectors offering greater attenuation if needed, per 1910.95(g)(8)(ii).
4. Refer for further evaluation. If a non-occupational cause cannot be identified and the STS is not attributable to a temporary threshold shift, the employee is referred for a clinical audiological evaluation or otological examination as appropriate.
5. Evaluate recordability. Dana Whitfield determines whether the STS is recordable on the OSHA 300 Log under 29 CFR 1904.10 — recordable when work-related and the employee's total hearing level at 2000/3000/4000 Hz averages 25 dB or more above audiometric zero in the affected ear. A retest within 30 days that does not confirm the STS relieves the recording duty; a confirmed retest is recorded within 7 calendar days.
6. Revise the baseline. A confirmed, persistent STS becomes the employee's new baseline audiogram for future comparisons at Summit Metal Products — Springfield Plant.

Annual Program Evaluation Checklist

Noise monitoring results reviewed for changes in exposure since the last evaluation.

Audiometric test completion rate confirmed for all enrolled employees across 1st shift, 2nd shift.

Audiometric trends reviewed across the enrolled population for new or unconfirmed STS cases.

All confirmed STS cases reviewed for completed written notification, refit/retrain, and referral steps.

OSHA 300 Log recordability determinations reviewed for the past year's STS cases under 29 CFR 1904.10.

Hearing protector selection reviewed against current noise sources and any new equipment or process changes.

Hearing protector attenuation (NRR, derated) reconfirmed as adequate for measured exposures.

Annual training completion confirmed for all enrolled employees, with content updated for any process or equipment changes.

Recordkeeping reviewed for completeness: exposure measurements, audiometric records, and training records.

Program Administrator and contact information (Dana Whitfield, EHS Manager) confirmed current.

Recommendations from the reviewing audiologist or physician, if any, logged and assigned for follow-up.

Overall Program updated to reflect actual conditions at Summit Metal Products — Springfield Plant (Springfield, OH) and redistributed to supervisors as needed.

Employee Training Topics (29 CFR 1910.95(k))

Per 29 CFR 1910.95(k)(3), annual training for every employee enrolled in this Program at Summit Metal Products — Springfield Plant covers three required topic areas:

- (i) The effects of noise on hearing, including how noise-induced hearing loss occurs, that it is typically gradual and painless, and the difference between a temporary and a permanent threshold shift.
- (ii) The purpose of hearing protectors, the advantages, disadvantages, and attenuation of the types made available at Summit Metal Products — Springfield Plant (insert earplugs, earmuffs), and instructions on their selection, fitting, use, and care.
- (iii) The purpose of audiometric testing and an explanation of the test procedures, including what a Standard Threshold Shift is and what happens if one is identified.

Training is delivered via in-person, instructor-led sessions and repeated annually, with content updated to reflect any changes in protective equipment or work processes since the prior session.

Dana Whitfield documents each employee's training completion date and topics covered as a training completion record — not a certification — and retains it as part of this Program's recordkeeping.

Appendix: Definitions

TWA (Time-Weighted Average)

An employee's average noise exposure over an 8-hour work shift, normalized to a standard exposure period.

dba

Decibels measured on the A-weighted scale, which approximates the sensitivity of human hearing and is the standard OSHA noise metric.

STS (Standard Threshold Shift)

A change in hearing threshold, relative to the baseline audiogram, of an average of 10 dB or more at 2000, 3000, and 4000 Hz in either ear.

Baseline revision

Replacing an employee's baseline audiogram with a more recent one when a persistent STS is confirmed, so future comparisons measure change from the new baseline.

12-Month Compliance Calendar

Key hearing conservation program dates for the next 12 months.

DATE	ITEM	DETAIL
Nov 1, 2026	HPD stock check	Confirm adequate on-site stock of hearing protectors (plugs, muffs) for all shifts.
Feb 1, 2027	Baseline audiograms due	Complete baseline audiograms for all covered employees at Summit Metal Products — Springfield Plant per 29 CFR 1910.95(g).
Feb 1, 2027	HPD stock check	Confirm adequate on-site stock of hearing protectors (plugs, muffs) for all shifts.
May 1, 2027	HPD stock check	Confirm adequate on-site stock of hearing protectors (plugs, muffs) for all shifts.
Aug 1, 2027	Annual training due	Deliver training covering the annual training topics required by 29 CFR 1910.95(k) (in-person).
Aug 1, 2027	Annual audiometric retest due	Schedule the annual audiometric retest for all covered employees, per 29 CFR 1910.95(g), with Foster Special Instruments.
Aug 1, 2027	Program annual review	Review the written Hearing Conservation Program for Summit Metal Products (SAMPLE) — Summit Metal Products — Springfield Plant for continued accuracy and effectiveness.
Aug 1, 2027	HPD stock check	Confirm adequate on-site stock of hearing protectors (plugs, muffs) for all shifts.