



City of Greenfield

CITY HALL: P.O. Box 127/ Greenfield, California 93927 / (408) 674-5591
CORPORATION YARD: (408) 674-2635

MEMORANDUM

TO: ALL CITY EMPLOYEES

FROM: Tom A. Odom, City Manager *taodom*

RE: HAZARD COMMUNICATION PROGRAM

In order to provide a safer and healthier working environment for all of us and to comply with State and Federal Requirements, the City of Greenfield is adopting a HAZARD COMMUNICATION PROGRAM.

This program is designed to inform and train employees with respects to the hazardous substances/chemicals that we may be using in our daily work activities.

It is the responsibility of management to insure that all employees are provided this information and it is the responsibility of all employees to perform their assigned tasks in accordance with the HAZARD COMMUNICATION PROGRAM.

Your cooperation will help improve our overall safety efforts. If you have any questions or concerns regarding this program and its implementation, please do not hesitate to contact me.



City of Greenfield

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* NOTICE TO ALL EMPLOYEES *

THE CITY OF GREENFIELD HAS A WRITTEN HAZARD COMMUNICATION PROGRAM STANDARDS FOR THE SAFETY OF ALL ITS EMPLOYEES. ALL EMPLOYEES WILL RECEIVE INITIAL TRAINING THROUGH RESPECTIVE DEPARTMENT MANAGERS IN ACCORDANCE WITH THE CITY HAZARD COMMUNICATION PROGRAM.

YOU WILL NEED TO READ CAREFULLY THE WRITTEN PROGRAM THAT HAS BEEN PROVIDED TO YOU. SHOULD YOU HAVE ANY CONCERNS OR REQUIRE ADDITIONAL INFORMATION OR ACCESS TO INFORMATION RELATIVE TO THIS PROGRAM, PLEASE DO NOT HESITATE TO CONTACT THE OFFICE OF CITY MANAGER.

Posted at: EMPLOYEES BULLETIN BOARD
CORPORATION YARD BULLETIN BOARD
POLICE DEPARTMENT BULLETIN BOARD
ENTRANCE WAY TO STORAGE AREA

Date Posted:

CITY OF GREENFIELD, CALIFORNIA

INJURY AND ILLNESS PREVENTION PROGRAM

I. Introduction: Management Commitment

The purpose of the City's Injury and Illness Prevention Program is to encourage employees to report unsafe conditions with assurance that City Management will take appropriate action(s). In correcting such conditions, the City displays a commitment to the safety and health of its employees.

The City has established the following objectives for its Prevention Program:

1. Each department manager shall provide information and training in safety and health issues for their employees;
2. Each department manager shall set the standard by, whenever, applicable, wearing protective safety equipment;
3. Inspect and maintain equipment to ensure proper and safe operation;
4. Post safety notices, annual summary of occupational injuries, and documents relative to health/safety and/or as requested by OSHA.

II. Assignment of Responsibilities
System of Compliance and Communications

The person responsible and with authority to manage the City's Injury/Illness Prevention Program will be the City Manager.

In order to ensure proper communication with city employees, the City shall establish a Safety and Health Compliance Committee. The Compliance Committee will report directly to the City Manager and be composed of employees representing each department of the City. (Committee members shall be non-management personnel.) Employees that knowingly violate and/or disregard safety procedures will be subject to disciplinary action as prescribed in the personnel manual.

Safety and Health Compliance Committee

- (1) member - Administration
- (1) member - Police Association
- (1) member - Public Works Department

The Committee's primary responsibilities include:

1. Meeting on a monthly basis and not less than on a quarterly basis with the City Manager;
2. Preparation and distribution to affected employees;

3. Written records of safety/health issues discussed at Committee meetings;
4. Maintain file for review by OSHA officials;
5. Conducts and/or review periodic scheduled worksite inspections;
6. Reviews investigations of occupational accidents and causes of incidents resulting in occupational injury or illness, exposure to hazardous substances, and where appropriate, recommends suggestions to city management for prevention of future incidents;
7. Reviews investigations of alleged hazardous conditions brought to the attention of any committee member. The Committee, if deemed necessary, may conduct its own inspection and investigation to assist in remedial solutions;
8. Submits recommendations to assist in remedial solutions;
9. Upon request of OSHA representatives, verifies abatement action taken by city management to abate citations issued by OSHA Division.

III. Communication

The Compliance Committee will assist in communicating safety and health issues with city employees on a quarterly basis, or if needed, more frequently. The City Manager will, by memorandums, staff meetings, and other necessary means, encourage open communications at all times in regards to issues involving safety and health. In this regard, the City Manager and Compliance Committee, working in concert, shall:

1. Discuss safety concerns with employees at regularly scheduled staff meetings;
2. Update Mayor and City Council of preventative measures and safety education at regularly scheduled City Council Meetings;
3. Conduct training meetings, and when possible, use video presentations;
4. Utilize bulletins and posters in all work areas of municipal departments;
5. Provide each employee a copy of this plan;
6. Publish and post city safety policy informing all employees that safety is a high priority issue with city management;
7. Document all communication efforts, to demonstrate system of communication is in place.
8. An employee has the right to provide notice regarding safety/health issues to the City anonymously.

IV. Procedures for Identification and Evaluating Workplace Hazards

Whenever new substances, process, procedures, or equipment are introduced to the workplace that represent a new occupational safety and health hazard; and whenever the employer is made aware of a new or previously unrecognized hazard the City of Greenfield shall maintain an effective hazard control system. The City will whole heartingly encourage employees to be aware of unsafe conditions and report any hazards to supervisor immediately. In addition, supervisors and managers routine duties shall consist of making everyday safety and health checks. Periodic inspections shall be conducted by City Manager and/or compliance committee.

Each department manager will be responsible for the development of scheduled inspections and documentation. Department managers, by memorandum shall encourage their employees to report any possible hazardous situations immediately. Their reports will be given prompt and serious attention. Such reporting shall be rewarded with letter of commendation for a job well done.

Workplace equipment and personal protective equipment will be maintained in safe and good working condition. Department supervisors will be responsible for monitoring the operation of workplace equipment, and also verify that routine preventative maintenance is conducted and personal protective equipment is reliable. Employees that knowingly violate and/or disregard safety procedures will be subject to disciplinary action as prescribed in the personnel manual.

The Compliance Committee, from time to time, may inspect equipment to ensure proper procedures and maintenance is in place.

Upon the identification of a hazardous condition, a target date must be set to correct. In most cases, this shall be immediately upon identification. In all cases, a written tracking system must be established in order to monitor the progress of hazard correction.

The Compliance Committee shall review and prioritize hazard conditions, based on the severity of hazard.

V. Injury/Illness Procedures

The City feels it is imperative that all occupational and illnesses, and injuries relative to the workplace, receive a proper and thorough investigation. All incidents and/or illness shall be reported in written form and submitted to the City Manager. The City Manager shall distribute copies to the Compliance Committee for their review and information.

The reports must adequately identify the cause(s); why it occurred; and what measures can be taken to prevent re-occurrence. The City shall request its insurance carrier to provide contract service to investigate and report findings and recommendations to city manager. Contents of investigation report should include:

1. What happened? - type incident of occupational/illness, or injury to employee, delays, damage, and/or any other conditions recognized as having a potential for losses or delays.

2. Why did incident happen? - Investigation must obtain all facts relative to the incident. What caused the incident, who was involved, employees qualified to perform functions, properly trained; proper operating procedures established for the task involved; were procedures followed, and if not, why not; existed situations; and how it can be corrected.
3. What should be done? - Aspects of the operation or process which require additional attention should be noted by the investigative party.
4. What action has been taken? - Action to reduce or eliminate the exposures being investigated should be noted. Those remaining to be addressed and any interim/precautionary measures should also be noted. Pending corrective action(s) and reasons for delaying its implementation should be identified.

VI. Corrective Measures

The investigation report should contain recommendations of corrective actions to be taken to ensure incident does not re-occur. It is the responsibility of the City Manager to implement these corrective measures. The Compliance Committee can assist with implementation and communication to other employees. The Compliance Committee should let employees know:

1. success of city's injury and illness program depends on employees and management working together;
2. safe work procedures required for employee jobs are for employee(s) safety and protection;
3. when personal protective equipment is required, how to use it and maintain in good working order;
4. what to do in case of an emergency.

Furthermore, a memorandum outlining the following should be given to each employee. These rules shall also be posted throughout municipal departments. Each employee needs to understand that:

1. no employee is expected to undertake a job until he/she has received instruction on how to do it properly and safely, and is authorized to perform the job;
2. no employee should undertake a job that appears to be unsafe;
3. no employee should use chemicals without fully understanding their toxic properties and without the knowledge required to work with them safely;
4. mechanical safeguards must always be in place and kept in place;

5. employees are to report to a superior or designated individual all unsafe conditions encountered during work; Imminent hazards shall be reported immediately upon discovery, abatement of imminent hazard will be priority of City Management.
6. any work-related injury or illness suffered, however, slight, must be reported to management at once;
7. personal protective equipment must be used when and where required, and properly maintained.

VII. Instructions and Training

The City shall provide training and instructions in the following prescribed manner:

1. to all employees when your program is first established;
2. to all new employees;
3. to all employees given new job assignments for which training has not been previously received;
4. whenever new substances, processes, procedures or equipment are introduced to the workplace and present a new hazard; new substances shall also conform to all requirements under the Hazard Communication Program of the City.
5. whenever new personal protective equipment or different work practices are used on existing hazards;
6. whenever City of Greenfield is made aware of a new or previously unrecognized hazard whenever employees should report any new or previously unrecognized hazard.
7. for all supervisors to assure they are familiar with the safety and health hazards to which employees under their immediate direction and control may be exposed.

The City shall utilize outside consultants when necessary to conduct training and instruction.

VIII. Documentation and Record Maintenance for Training Activities

The City of Greenfield will document, through implementation of this plan, all records and activities regarding injury and illness plan. All records shall be maintained for three years. All documentation and records will be made available to employees upon their request.

For the purpose of recordkeeping, inspections files are to be kept as a separate record from training. Training files will be under separate cover and documented accordingly.

WRITTEN HAZARD COMMUNICATION PROGRAM
FOR
THE CITY OF GREENFIELD

The following information outlines our City's compliance program for the Federal Hazard communication Standard 29 CFR 1910.1200 and Cal OSHA GISO 5194. The information in this section shall be our Written Hazard Communication Program, along with information contained in other sections of this manual.

PART 1. HAZARD COMMUNICATION COORDINATOR

The Office of the City Manager is designated as coordinator of our Hazard Communication Program. It shall be part of her/his job responsibility to help keep our City in compliance with the Hazard Communication Standards, along with help from City department heads and other employees.

The HAZARD COMMUNICATION COORDINATOR can be contacted during the hours of 8 a.m. to 5 p.m. at the City Hall, 674-5591.

PART 2. NOTICE TO EMPLOYEES

We have informed our employees of the existence of the Hazard Communications Standards by posting signs to that effect in the following places:

*Employees Bulletin Board *Police Department Bulletin Board
*Corporation Yard Bulletin Board *Doors of Storage Areas

PART 3. MATERIAL SAFETY DATA SHEETS

We have collected Material Safety Data Sheets for all hazardous chemicals in the work place. These MSDSs are available to all employees during their regular work shifts, and are kept at:

*City Manager's Office *Police Chief's Office
*Public Work's Office *Some Department Areas & Storage Areas

PART 4. TRAINING PROGRAM

We have instituted a complete Hazard Communication Training Program consisting of a video presentation, a series of discussion sessions concerning specific hazards in our work place, and measures we have taken to protect workers.

All new employees are trained BEFORE they start job assignment and all present employees working for the City must have had their initial training. All employees are retrained ANNUALLY or when a new hazard is introduced into the work place. Documentation of training conducted and completed will be retained by Administrative Services Officer.

In addition to the training methods listed above, we train employees by:

- One-on-one Training by Supervisors
- Weekly Tailgate Safety Meetings
- Professional Training Seminars
- Independent Reading Assignments by Employees

PART 5. LABELLING PROGRAM

We are using the following labelling system as a means of making sure our employees can quickly see the name and address of the manufacturer, the type and severity of hazard that exists, how to properly protect themselves, and how to work with the chemical/substance safety:

HMIS (Hazardous Material Identification System)

This is the most popular labelling system using a number rating and color coding for the three areas of HEALTH HAZARD (blue), FIRE HAZARD (red), and REACTIVITY (yellow), and SYMBOLS for the type of personal protective equipment to use. Each hazard is rated using a number system from 0 to 4, with 0 being a very minimal hazard and 4 being the most severe hazard.

Department heads are responsible for making sure all hazardous chemicals are labelled in their respective departments.

Upon acquisition, we will examine all hazardous chemicals for proper manufacturer's labelling and then supplement labelling during inspection, with the above system.

We will evaluate the hazards of the chemicals by:

1. Using the MSDS as a reference source.
2. Using the hazard evaluations from our supplier.
3. Cross referencing information with the County Health Department
4. Other prevention first safety services, Risk Management Consultants

PART 6. METHOD OF INFORMING CONTRACTORS OF HAZARDS

The method used to inform contractors who perform work in our workplace if the potential hazards are as follows:

1. Give them a letter telling them of the potential hazards to their employees.

2. Provide them with access to the CHEMICAL LIST, MATERIAL SAFETY DATA SHEETS, THIS WRITTEN PROGRAM AND REQUIREMENT OF THE PROPER PERSONAL PROTECTIVE EQUIPMENT.
3. Instruct them with our training program, if the amount of exposure warrants it.
4. Post sign in a common work area informing them of the potential hazards and telling them of their right to information and training.
5. Inform contractor and subcontractor of potential hazards prior to their commencement of work with the City of Greenfield.

PART 7. STEPS TAKEN TO PROTECT EMPLOYEES

We have taken the following steps to protect employees against hazards:

1. Formalize safety program with each activity having a job hazard analysis.
2. Complete inventory of all hazardous materials to evaluate and determine whether substitute chemicals could be used.
3. Mechanical devices such as: intake and exhaust fans, are currently being designed into proposed City maintenance facility.
4. Administration is continually educating employees with information regarding hazardous materials for their own health and safety as well as public health and safety.
5. Regarding personal protective equipment, refer to MSDS SECTIONS - SPECIAL PROTECTION INFORMATION AND SPECIAL PRECAUTIONS.
6. Whenever dealing with a toxic substance, employee has been instructed to inform supervisor and/or co-worker of location where handling is to take place in case employee is overcome by toxic substance. Always use the "buddy" system.
7. There are warning signs placed throughout the facility to show areas of storage and potential hazard.

PART 9. HOW TO IDENTIFY HAZARDS OF PIPES USED TO CARRY CHEMICALS

All pipes used to carry hazardous chemicals shall be labelled in accordance with the labelling systems outlines in Part 5 of this Written Hazard Communication Program.

PART 10. AVAILABILITY OF THE Cal-OSHA HAZARD COMMUNICATION
STANDARD TO EMPLOYEES.

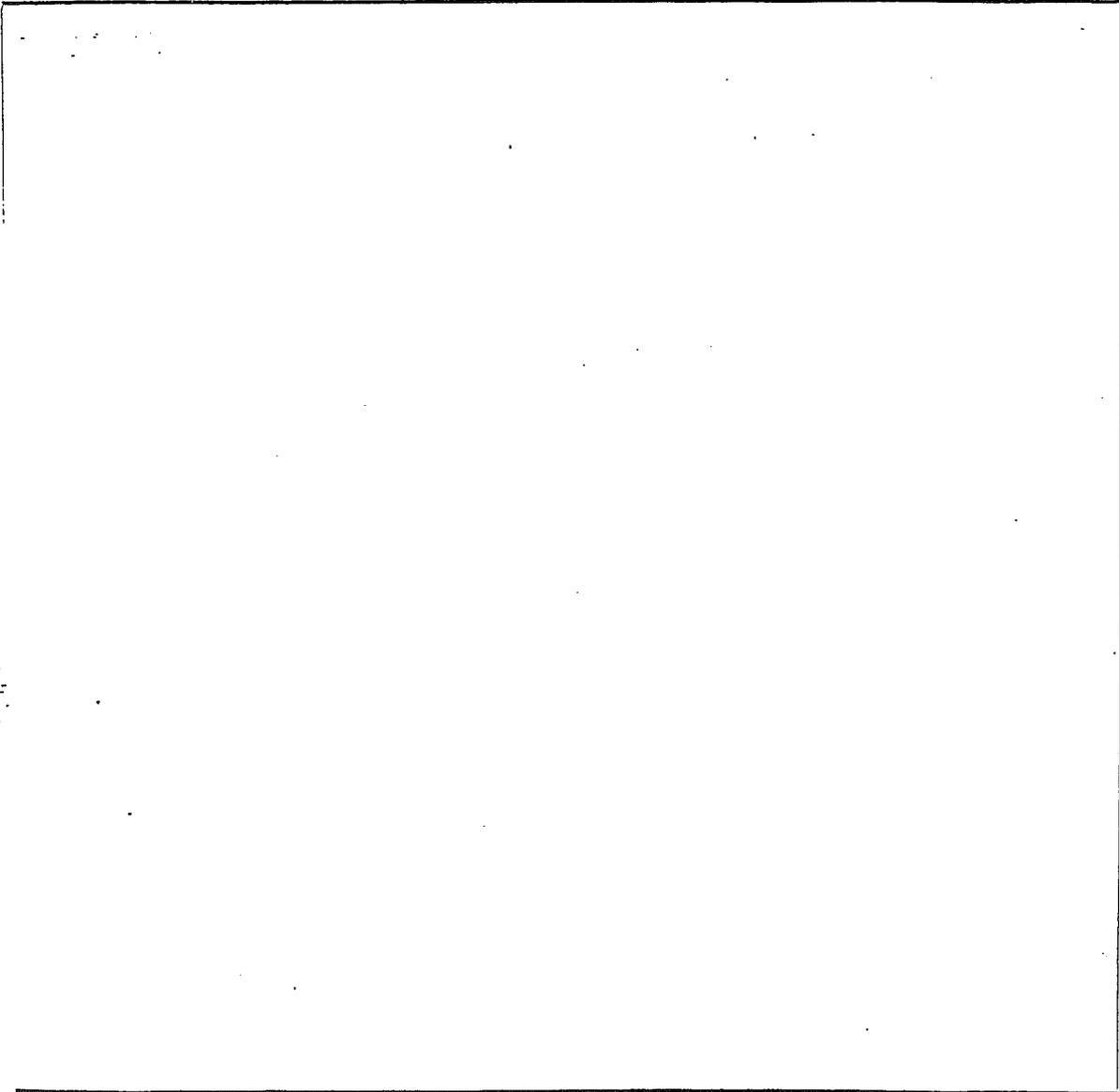
The Cal-OSHA Communication Standard is available to all employees upon request from their supervisor.

PART 11. CHEMICAL LIST

The following list of chemical has been composed from the MSDS file. These chemicals are used in the workplace and may pose potential hazards to employee. Use the following form as a master to make copies. Keep this list updated and available in all locations where hazardous Materials Communications Programs are kept. (see next page)

PART 12. CHEMICAL LOCATIONS

The following floor plan of your workplace shows the location of the chemicals listed on the CHEMICAL INVENTORY FORM.



CITY OF GREENFIELD
HEARING CONSERVATION PROGRAM

Policy

It shall be the policy of all City departments to conduct a hearing conservation program based on requirements contained in the California Administrative Code, Title 8, Section 5096.

Sound Level Survey

- A. All work areas where there could be significant noise levels shall be surveyed to determine the highest noise level. The results shall be recorded. This survey shall be conducted annually and when there is a change in machinery.
- B. Each area which exceeds 90 DBA shall be thoroughly surveyed to noise source(s) and an area profile of those results recorded.
- C. Employees shall not be exposed to impact/impulse noise which exceeds the limits specified in the California Administrative code 5096 (b) (1) (2) (3).

Monitoring

- A. Each job function that has an exposure which exceeds a daily noise dose of 85.0 dBA or impact/impulse of 90.8 dBA will be documented. A representative employee of each job function can be monitored to meet this requirement.
- B. Affected employees and/or safety and health compliance committee representative shall be provided the opportunity to observe any testing, sampling or monitoring.
 1. They shall be notified of the date, time and place of testing in advance.
 2. They shall be allowed access to records of such monitoring results.
 3. Employees exposed to a daily noise dose exceeding 1.0 shall be advised in writing of such exposure and the corrective action to be taken by the City.

Methods of Compliance

A. Engineering Controls

1. Whenever the operations reasonably permit, employee exposures to noise exceeding a daily noise dose (D) of 1.32 (LEXP of dBA), and exposures to impact/impulse noise exceeding the limits specified by the California Administrative Code 5096 (b) shall be eliminated or at least reduced by engineering controls.
2. Engineering controls will not be required if an employee's exposure to noise does not exceed 100 dBA and the exposure time above 90 dBA does not exceed 8 hours per week, provided the employee is properly protected by acceptable hearing protectors.

B. Administrative Controls

Whenever the operations reasonably permit, administrative controls shall be implemented to avoid or reduce the use of hearing protectors. This can be accomplished by rotating employees to work areas with low noise exposure.

- C. Hearing protectors may be worn to reduce employee exposure to noise where engineering or administrative controls are not reasonably feasible.

Hearing Protectors

- A. Each department shall publish a list of jobs that exceed 90 dBA or impact/impulse noises as described in the California Administrative Code 5096 (b) (1) (2) (3) and require those employees to wear hearing protection.
- B. Each department shall establish a list of employees whose daily noise exposure exceeds 85 dBA when their audiogram shows a significant threshold shift and those employees shall be required to wear hearing protectors.
- C. Hearing protectors used must have EPA and/or NIOSH noise reduction ratings (NRR) and provide adequate attenuation for the exposure.
1. To evaluate the effectiveness of hearing protectors, convert the employee's "A" weighted dosimeter percentage to the time weighted average (TWA), and subtract 7 dB from the NRR and subtract TWA - (NRR-7 dB)=Attenuation.
 2. Example: An employee's TWA is 95 dB, the hearing protector NRR is 28. Attenuation is as follows:
$$96 - (28 - 7) = \text{dB}$$
- D. Ear plugs requiring fitting shall be issued only by personnel who have been qualified as an audiometric technician or who have obtained documented instruction from a physician.
- E. Hearing protectors that do not require fitting may be issued from the supervisor providing that employees have been instructed in their proper use.
- F. Employees shall be trained in the proper maintenance and sanitation of hearing protectors.

Audiometric Testing

- A. Employees exposed to a daily noise dose exceeding 85 dBA or to impact/impulse noise exceeding 90.0 shall be retested at least annually thereafter. Employees working less than 60 work days per year are not required to be tested.
- B. Audiometric tests shall be preceded by a period of at least 14 hours during which time there is no exposure to workplace sound levels in excess of 80 dBA. Hearing protectors may be worn to reduce noise levels below 80 dBA.

- C. Each employee's subsequent audiogram shall be examined to determine if any improved hearing level or significant threshold shift in either ear has occurred relative to the reference audiogram.
1. If the average hearing level improves more than 5 dB for frequencies at 1000, 2000, or 4000 Hz for both ears, the new audiogram shall become the reference audiogram.
 2. If a significant threshold shift is present, a retest shall be made available to the employee within 30 workdays. Significant shift is defined as follows:
 - a. An average increased hearing level of 10 dB or more at frequencies of 2000, 3000, and 4000 Hz relative to the reference audiogram for either ear.
 - b. An increased hearing level of 30 dB at 6000 Hz relative to the reference audiogram for either ear.
 3. If the shift persists in the retest, the test results shall be evaluated by an audiologist or a physician, and the employee shall be examined by a physician, if necessary, to determine the cause of the threshold shift.
 - a. If the threshold shift appears to have a cause other than noise exposure, the employee shall be notified and referred to an appropriate source of medical care.
 - b. If the threshold shift is stated to be noise-induced:
 1. Employees who have not used hearing protectors previously shall now be required to wear hearing protectors when exposed to 85 dB or more.
 2. Employees who have already been issued hearing protectors shall be retrained and reinstructed in the use of hearing protectors.
 3. The employee shall be notified (within 21 days) in writing of the shift in hearing level, and this hearing level becomes the new reference audiogram.
 4. This then becomes a recordable accident. Appropriate entry on OSHA 200 log is required.
- D. Audiometric testing shall be administered by a certified audiometric technician or a reputable health service contractor. The contractor shall comply with any state or federal regulations as pertains to methods of testing and calibration of equipment.

Record Keeping

- A. All records pertaining to noise monitoring, dosimeter tests, audiometric testing and doctor's reports shall be retained as outlined in the California Administrative Code, Title 8.

- B. Such records shall be made available to employees or their designated representatives.

Posting of Signs

- A. Signs which are clearly legible at a distance of 20 feet, shall be posted at entrances to, or on the periphery of areas where employees may be exposed to noise levels in excess of the limits prescribed in paragraph 1303 of this procedure.

- B. Wording of signs shall be as follows:

1. 90 to 94 dBA level

"CAUTION"

Hearing protection required for employees working 30 minutes or more in this area.

2. 95 dBA or higher

"CAUTION"

Hearing protection required for employees working 15 minutes or more in this area.

MEMORANDUM

TO: CITY STAFF
FROM: CITY MANAGER
DATE: May 5, 1995
RE: Safety in the Workplace

In regards to city employees safety and to ensure that preventative measures have been undertaken to avoid potential accidents, please be advised of the following:

1. No employee is expected to undertake a job until he or she has received instruction on how to do it properly and safely, and is authorized to perform the job.
2. No employee should undertake a job that appears to be unsafe.
3. No employee should use chemicals without fully understanding their toxic properties and without the knowledge required to work with them safely.
4. Mechanical safeguards must always be in place and kept in place.
5. Employees are to report to a superior or designated individual all unsafe conditions encountered during work; Imminent hazards shall be reported immediately upon discovery, abatement of imminent hazard will be priority of City Management.
6. Any work-related injury or illness suffered, however, slight, must be reported to management at once.
7. Personal protective equipment must be used when and where required, and properly maintained.

These rules are intended to provide additional safety measures for employees. (They) should not be used to avoid certain job duties or ~~as a reason to be insubordinate~~. The health and safety of all employees is of the highest priority to the City.

If you have any questions or need additional explanation to this memorandum, please do not hesitate to contact your department manager or myself.



PART 10. AVAILABILITY OF THE Cal-OSHA HAZARD COMMUNICATION
STANDARD TO EMPLOYEES.

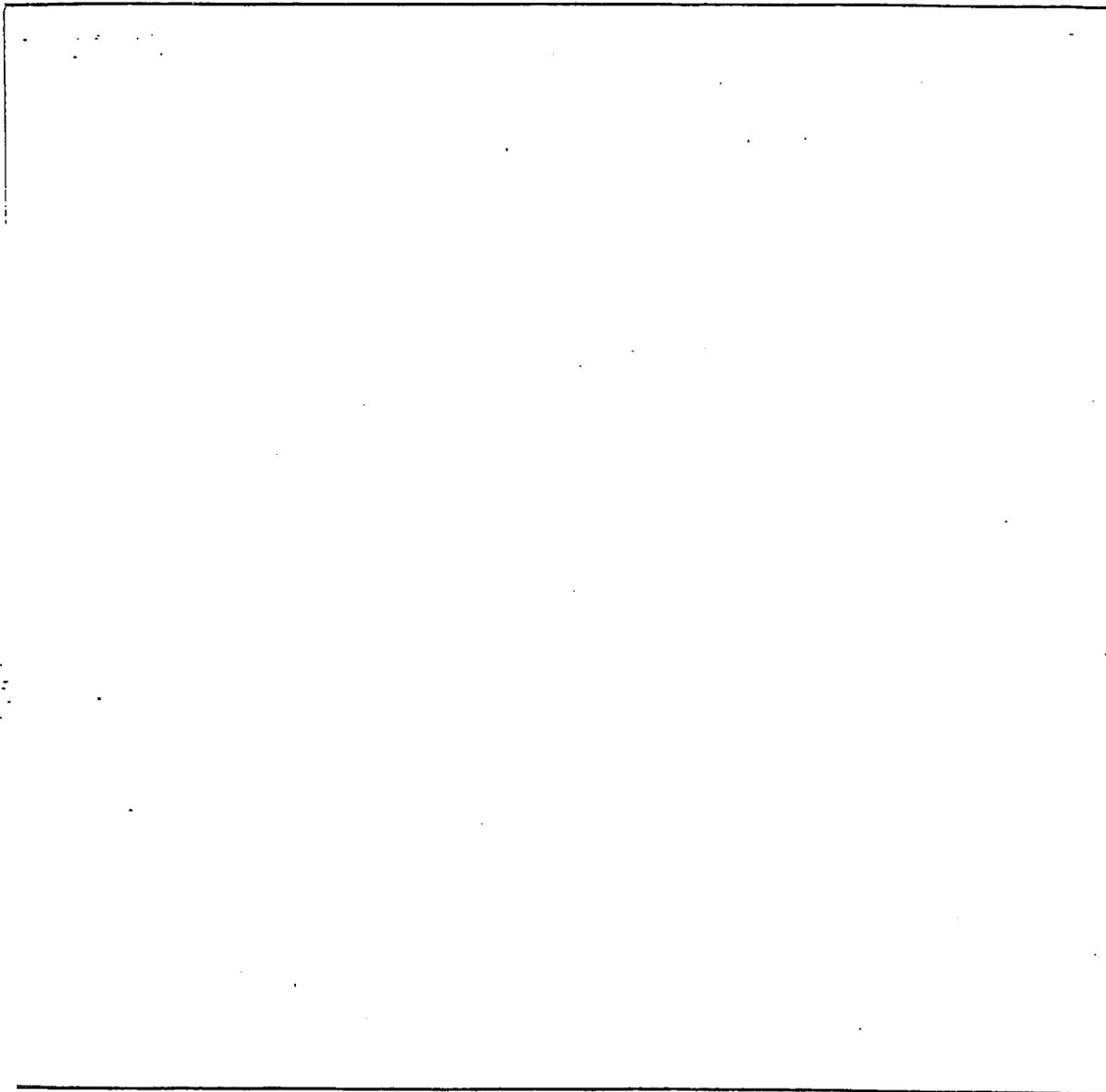
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Sound Level Survey

- A. All work areas where there could be significant noise levels shall be surveyed to determine the highest noise level. The results shall be recorded. This survey shall be conducted annually and when there is a change in machinery.
- B. Each area which exceeds 90 DBA shall be thoroughly surveyed to noise source(s) and an area profile of those results recorded.
- C. Employees shall not be exposed to impact/impulse noise which exceeds the limits specified in the California Administrative code 5096 (b) (1) (2) (3).

Monitoring

- A. Each job function that has an exposure which exceeds a daily noise dose of 85.0 dBA or impact/impulse of 90.8 dBA will be documented. A representative employee of each job function can be monitored to meet this requirement.
- B. Affected employees and/or safety and health compliance committee representative shall be provided the opportunity to observe any testing, sampling or monitoring.
 1. They shall be notified of the date, time and place of testing in advance.
 2. They shall be allowed access to records of such monitoring results.
 3. Employees exposed to a daily noise dose exceeding 1.0 shall be advised in writing of such exposure and the corrective action to be taken by the City.

Methods of Compliance

A. Engineering Controls

1. Whenever the operations reasonably permit, employee exposures to noise exceeding a daily noise dose (D) of 1.32 (LEXP of dBA), and exposures to impact/impulse noise exceeding the limits specified by the California Administrative Code 5096 (b) shall be eliminated or at least reduced by engineering controls.
2. Engineering controls will not be required if an employee's exposure to noise does not exceed 100 dBA and the exposure time above 90 dBA does not exceed 8 hours per week, provided the employee is properly protected by acceptable hearing protectors.

B. Administrative Controls

Whenever the operations reasonably permit, administrative controls shall be implemented to avoid or reduce the use of hearing protectors. This can be accomplished by rotating employees to work areas with low noise exposure.

- C. Hearing protectors may be worn to reduce employee exposure to noise where engineering or administrative controls are not reasonably feasible.

Hearing Protectors

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4. Mechanical safeguards must always be in place and kept in place.
5. Employees are to report to a superior or designated individual all unsafe conditions encountered during work; Imminent hazards shall be reported immediately upon discovery, abatement of imminent hazard will be priority of City Management.
6. Any work-related injury or illness suffered, however, slight, must be reported to management at once.
7. Personal protective equipment must be used when and where required, and properly maintained.

These rules are intended to provide additional safety measures for employees. (They) should not be used to avoid certain job duties or ~~as a reason to be insubordinate~~. The health and safety of all employees is of the highest priority to the City.

If you have any questions or need additional explanation to this memorandum, please do not hesitate to contact your department manager or myself.

Jon Olson