



COMMON FINDS: HEARING CONSERVATION

BACKGROUND:

Municipalities and school districts routinely rely on a wide range of tools and equipment to improve infrastructure and maintain operations. These tools can range from small handheld devices, such as angle grinders, to more hazardous equipment, such as chainsaws.

A commonly overlooked risk associated with this equipment is exposure to harmful noise levels—for both employees and others in the surrounding area. Whether conducting roadwork, construction activities, equipment repairs, or even music and band instruction, public entities must evaluate their environments and equipment in accordance with **OSHA standard 29 CFR 1910.95**.

This standard establishes action levels and outlines employers' responsibilities regarding occupational noise exposure. CIRMA Risk Management frequently observes that public entities are uncertain whether a Hearing Conservation Program is required, because they lack documented noise exposure assessments.

RECOMMENDATIONS:

Public entities should determine whether a Hearing Conservation Program is required by conducting noise monitoring of relevant tools and work environments in accordance with **OSHA standard 29 CFR 1910.95**. If monitoring shows that noise levels meet or exceed the action level—an eight-hour time-weighted average of 85 decibels (dBA)—the employer must implement an effective Hearing Conservation Program and notify affected employees of their exposure.

RECOMMENDATIONS (continued)

MONITORING

Establish and maintain an audiometric testing program in accordance with OSHA standard 29 CFR 1910.95(g) (1) by providing audiometric testing at no cost to all employees whose noise exposure meets or exceeds an 8-hour time-weighted average of 85 decibels (dBA). Baseline audiometric testing should be conducted within six (6) months of an employee's initial exposure at or above the action level, with annual testing thereafter.

- Consider enrolling in the CONN-OSHA Voluntary Compliance Program, which can help evaluate workplace noise exposure and review existing hearing conservation efforts.
- Reevaluate and retest employees when changes in production processes, equipment, or controls increase noise exposure levels, potentially reducing the effectiveness of existing hearing protection.

TRAINING

Provide annual training to employees exposed to noise levels at or above an eight-hour time-weighted average of 85 decibels (dBA), covering the following topics:

- The effects of noise on hearing
- The purpose of hearing protection, including the advantages, disadvantages, and attenuation of various types
- Proper selection, fitting, use, and care of hearing protectors
- The purpose of audiometric testing, including an explanation of testing procedures

Consider utilizing the CIRMA e-Learning platform to support employee training on general awareness of OSHA Hearing Conservation requirements.

EQUIPMENT

Regularly evaluate the adequacy of hearing protector attenuation for the specific noise environments in which they are used, in accordance with Appendix B of the OSHA standard 29 CFR 1910.95.

Ensure that appropriate hearing protection is provided at no cost and that all employees exposed to noise levels at or above an 8-hour time-weighted average of 85 decibels (dBA) consistently wear it.

RECORDKEEPING

Under OSHA standard 1910.95(m), employers must keep noise exposure measurement records for two years and maintain audiometric test records for the duration of the affected employee's employment. Audiometric test records must include the employee's name and job classification, the date, the examiner's name, the date of the last acoustic or exhaustive calibration, measurements of background sound pressure levels in audiometric test rooms, and the employee's most recent noise exposure measurement. Employers must also record work-related hearing loss cases when an employee's hearing test shows a marked decrease in overall hearing.

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