

Monsanto

PLAINTIFF'S EXHIBIT

MON-694

FROM (NAME & LOCATION)

R.T. Hammann, LP&S, Texas City

O-22

Ext. 3234

DATE

June 29, 1983

CC:

G.W. Daues

O-10A

SUBJECT

HEARING CONSERVATION PROGRAM--TEXAS CITY

REFERENCE

TO

G. L. Tromblee O-10

This memo summarizes the Hearing Conservation Program at Texas City. Parts of this program have been in effect for years, others went into effect 4/7/83, still others remain to be done. The OSHA Hearing Conservation Amendment requires employers to establish a monitoring program for employees exposed to 85 decibel (dB) 8-hour Time Weighted Average (TWA). The Monsanto DMEH guideline specifies this be done for employees exposed to 80 dB. Our program is designed to comply with the OSHA regulation while incorporating the more stringent requirements from DMEH. Implementation of this program will put us in compliance with both OSHA and DMEH guidelines.

The following is a summary of our Hearing Conservation Program:

1. Audiometric Testing

- a. Test personnel located in the field annually and office personnel whenever they get their physical (this is approximately 18 months).
- b. A letter explaining the basis for preparing herself/himself for the audiometric test is sent to the individual along with the hearing test notification card.
- c. ECHO program - This program analyzes audiometric testing data and puts it in a form for determining any hearing problems. The audiogram from 1972 (first audiogram for those employed since 1972) is considered the baseline, since the nurses attained State certification as audiologists that year. As analyses are returned from St. Louis, those individuals having a Standard Threshold Shift (STS) will be retested within 30 days. If the retest confirms that an STS has occurred, the employee will be informed of this fact and asked to sign a document showing that he/she has been so informed. The employee receives a copy of this document which may advise her/him to seek further medical attention.
- d. The audiometer is calibrated daily by means of an acoustical ear. Periodic checks are made by the Industrial Hygiene Department. An exhaustive calibration is conducted yearly by an outside firm.
- e. Those cases where hearing loss is excessive (>25 dB in both ears at 1,000, 2,000, and 3,000 hertz) will be evaluated in detail to determine whether or not they are work related cases.

2. Identification of those areas in the plant having noise levels >80 dB and 85 dB

Noise surveys have been completed and operating units have maps showing these areas. The method for further identifying noise areas needs to be

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determined. All personnel entering an 85 dB area will be required to wear hearing protection. Any person having an STS will be required to wear hearing protection when entering an 80 dB or greater area. This means that these personnel will be required to wear hearing protection in many of the working areas of the plant.

3. Evaluation of Hearing Protectors

We comply with the ruling in that we have a variety of good hearing protectors available for employees. The present protectors will be reevaluated and other protectors evaluated. Changes will be made as needed based on effectiveness, comfort, cost, and ease of identification during use.

4. Personal Monitoring

Individuals wearing dosimeters are notified in writing as to the results obtained when wearing the dosimeter. This report states the noise level and the corrective action to be taken by the individual's supervisor if an overexposure occurs.

5. Training Program

The slide/tape program, "Noise Control, A Training Program for Employees", has been put on video tape. Four copies of this tape are being circulated throughout the plant for training of all field personnel. This training will be completed by the end of the year and will be conducted on an annual basis thereafter. Verification of training completion is sent in writing to Industrial Hygiene where records for the plant are kept.

6. Dissemination of the OSHA Hearing Conservation Amendment

A copy of this amendment has been posted at the Main Gate. Additional copies will be given to supervision of all units and crafts.

7. Procedure Bulletin on the Hearing Conservation Program

A plant Procedure Bulletin will be developed on the Hearing Conservation Program.

The above mentioned points will result in a good Hearing Conservation Program for the Texas City plant. Emphasis this year will be placed on audiometric testing and training in the need for and actual use of hearing protectors.



R. T. Hammann

RTH/es

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