



OSHA Noise Reinterpretation Issue: Time For Facts

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Your data is needed by PMPA to help us provide facts regarding the impact of a proposed change for the precision machining industry.

The issue involves a change in the interpretation of the word *feasible* by OSHA. Under the new definition, owners whose shop noise levels exceed 85 decibels could be required to install expensive engineering or administrative controls that would abate the noise to below the action level. Personal Protective Equipment (PPE) might no longer be acceptable as the sole means of addressing noise exposure in our shops.

The purchase of sound-dampening equipment is not only expensive, but such equipment might also not be effective in bringing down the noise levels of our industry. At a time when our ability to manufacture is under global attack from highly variable exchange rates, manipu-

lated currencies and unpredictable demand, this proposed change could be the final straw for many shops trying to remain open in the current environment.

Action You Have To Take:

PMPA is preparing comments for our members and the precision machining industry NAICS 332721. Your data can help us make a compelling case against this revised interpretation. If you have sound level data from your operation, please forward it to Miles Free at mfree@pmpa.org. Your data and identity will be held in the strictest confidence.

Here is what we'd like to know:

- What is the noise level in your shop in decibels (8-hour Time Weighted Average)?
- How many employees are at this location?
- Do you have a hearing conservation program in place?
- In which state is your shop located?
- How many primary production machines might be affected?
- What kinds of machines do you have?

- What do you expect will be your shop's cost for sound dampening?
- How much of your production capacity would you have to shut down in order to get below 85 decibels TWA if you chose to use administrative (scheduling) controls?

PMPA is currently preparing comments. Your data can help us make a difference. For more information, please see our fact sheet on the website at: <http://tinyurl.com/2fzn8va>. Please send your data (in confidence) to Miles Free at mfree@pmpa.org; fax 440-526-0300; or mail at PMPA, 6700 West Snowville Road, Brecksville Ohio 44141.

Don't Delay. PMPA and other metalworking associations requested and received an extension on the comments deadline so that we can obtain the facts needed to properly assess the consequences of this new interpretation. Comments are now due by March 21, 2011. We need your facts to make our case.

Together, with this data, we are confident we can make a difference.

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Notice of proposed reinterpretation: <http://tinyurl.com/2duq297>

PMPA extension request letter: <http://tinyurl.com/2fc75p5>

Links: Extension letter: <http://tinyurl.com/26z8o58>

PMPA Blog Fact Sheet: <http://tinyurl.com/2fzn8va>