CPI Corrugated Sector Advisory Note

Noise in a Corrugator Plant

A member company has agreed to share their experience in reviewing their arrangements to comply with the Noise at Work Regulations 1989, following the visit of an HSE Inspector. It is hoped that this advisory note will be of help to members who are reviewing their arrangements, especially with a view to complying with the Control of Noise at Work Regulations 2005.

Noise at Work Regulations 1989

The critical issues in this case were associated with Regulations 4, 5 & 7 of the 1989 Regulations.

- The carrying out of a noise assessment by a competent person. An in house survey had been undertaken and reviewed on a regular basis, by a trained employee. However, on closer inspection it was identified that this person had not completed an assessment, as required, and was not deemed competent to do so, due to a lack of suggestions for noise reduction actions. The identification of all employees likely to have a daily personal exposure of 85dB(A) or above. The survey undertaken had not addressed this issue.
- The requirement for noise above the second action level 90dB(A) to be reduced at source (engineered out) by means other than the use of hearing protection. The site had installed a range of protective equipment, noise enclosures etc., but had not addressed all noise sources in this way. Ancillary equipment, pumps, waste ducting etc. had been overlooked in the noise reduction process. Good arrangements were in place for the provision and use of hearing protection but this did not remove the requirement to reduce noise at source. HSE report that this is identified as a common problem, where companies have passed the noise reduction requirement and gone straight to PPE. This does not meet the current or the impending Regulations.

The review of controls identified a number of problems. The noise enclosures on the corrugator single facers were 15 years old and their effectiveness had been reduced. The gaps in the enclosures that allowed the liners to enter the single facer were greater than necessary for this purpose and, therefore, not as effective as they should be. Diesel powered trucks were being used which were noisier than gas. Other equipment within the plant, particularly pumps, contributed to the overall noise levels and increased the risk of employees being exposed to 85dB(A) or more. The appendix shows before and after improvements the site made and noise reductions achieved and includes a, partially costed, action plan for further noise reduction.

General Issues Regarding the 1989 Regulations

Assessment Standards

HSE general criticisms of the standard of noise assessments include:

- In 2002, 63% of noise assessment were deemed inadequate
- Poor presentation of results
- Poor layout – difficult to extract information
- No detailed plan of action
- No detailed recommendations
- Over-reliance on dosimetry
- Silence on the subject of noise control

Audiometric testing

This is an area where careful consideration of the issues and a robust policy are required. Medical Examinations, Occupational Health, The Data Protection Act and the Maintenance Of Medical Records all have an impact.

Companies need to be assured of the competence and confidentiality of the person(s) undertaking any audiometric tests. They need to be clear what records can be kept, where they are stored and the security attached to them. In addition there is the issue of the employees giving their consent to relevant medical information being made available to the employer.

The 1989 Regulations did not require facilities to be provided for workers to have their hearing checked if they were exposed to noise at or above the first action level, which was a condition of the EEC Directive. At the time of the Regulations it was considered that the NHS could provide these facilities in the UK.

The above all refer to the existing Regulations, the new Regulations come into force in 2006.

Control of Noise at Work Regulations 2005

Delegates who attended the CPI Biennial Conference in October were given a presentation on the new regulations by Peter Wilson of the Industrial Noise and Vibration Centre (this is available to members on the CPI web site). He identified the following for attention:

Key performance issues:

- Noise Management Assessments
- Noise Control
- Buy Quite

Implications of the Regulations

- More PPE required (everyone above 85dB(A))
- Extend and update assessments (areas above 80dB(A))
- Increase health surveillance (mandatory above 85dB(A))
- Implement noise control programme (this is the issue, less reliance on PPE. Can't use PPE long term unless engineering solution is not reasonably practicable)

The cost impact of health surveillance, where the noise level exceeds 85dB(A), was clearly spelt out some example given were:

Audiometric Facilities

- Soundproof booth in a quiet area (c£6000)
- Automated audiometer (£2000 - £4000)
- Trained staff

Mobile Audiometry

- C £25/ head, 20 – 30 staff per day / booth
- Additional admin to bring it up to the required standard

Overheads

- c 1 man hour lost for each audiogramme
- Admin – ensuring no noise exposure prior to test
- Record keeping and results processing
- Management action based on the results

Useful guidance (from HSE) - is available on their web site at: www.hse.gov.uk/noise/index.htm

Also in the HSE publication: HSG 138 **Sound Solutions** Techniques to reduce noise at work.