

SECTION 23

EXPOSURE CONTROL PROGRAM

Company Exposure Control Program

SUBJECT: Exposure Control Plan for Maul Electric, Inc. Personnel with Occupational Exposure to Bloodborne Pathogens

A. Purpose.

This instruction provides for uniform policy for protection of Maul Electric, Inc. personnel who, as part of their job, face reasonably anticipated exposure to bloodborne pathogens.

B. Scope.

This instruction applies to all Maul Electric Inc. Employees.

C. References.

1. 29 CFR 1910.1030, Occupational Exposure to Bloodborne Pathogens.
2. 29 CFR 1910.20, Access to Employee Exposure and Medical Records.

D. Action.

Maul Electric, Inc. Administrators shall use this Plan to ensure that Maul Electric, Inc. personnel who have occupational exposure to Bloodborne Pathogens are afforded protection in accordance with 29 CFR 1910.1030.

EXPOSURE CONTROL PLAN FOR MAUL ELECTRIC, INC. PERSONNEL WITH OCCUPATIONAL EXPOSURE TO BLOODBORNE PATHOGENS

I. EXPOSURE DETERMINATION

All Maul Electric, Inc. employees who, as a result of performing their job duties, must engage in activities where exposure to blood or other potentially infectious materials is reasonably anticipated are considered to have occupational exposure.

Maul Electric, Inc. employees designated as First Aid Responders are considered at risk of occupational exposure due to the nature of these duties (e.g., assisting bleeding victims, resuscitation) and are included in this Plan.

Field personnel shall take necessary precautions to avoid direct contact with body fluids and shall, except when absolutely necessary for the performance of duties, not participate in activities nor enter areas that will require them to come into contact with body fluids, needles, or other instruments or surfaces that are contaminated with blood or other potentially infectious materials. Any procedure that can be avoided is not to be undertaken. Any employees who come in contact with potentially infectious materials are considered at risk regardless of the use of personal protective equipment.

II. METHODS OF IMPLEMENTATION

A. Methods of Compliance

1. Universal Precautions

Maul Electric, Inc. personnel are not to handle contaminated objects unless absolutely necessary for performance of their duties.

Maul Electric, Inc. personnel shall use **universal precautions** (see Standard for definition) when contact with any blood or other potentially infectious materials are absolutely necessary (e.g., removing a sampling device that has become contaminated with blood).

2. Work Practice Controls

a. Hand Washing Facilities

Antiseptic wipes will be provided to personnel with duties in Section I of this plan. These wipes are to be carried by First Aid Responders on sites where soap and running water may not be immediately available and used if contact of any skin surface with blood or other potentially infectious material occurs. Such wipes should be disposed of as would any other trash except in a very rare circumstance where they would become contaminated to the extent (see standard) that they would be considered regulated waste. In such case, see Section 2 of this plan.

When such wipes are used, hands, or other skin surfaces cleansed using wipes are to be washed as soon as feasible with soap and running water.

Employees are to wash hands with soap and water as soon as feasible after removal of gloves.

Employees are to wash hands and any other skin with soap and water, and flush mucous membranes with water, immediately or as soon as feasible following contact of those body areas with blood or any other potentially infectious material.

b. Contaminated Equipment

In order to prevent occupational exposure to personnel, equipment that may become contaminated with blood or other potentially infectious materials are to be examined prior to servicing or shipping and decontaminated (e.g., wiped off with bleach or other disinfectant) as necessary. All equipment that can be easily decontaminated at the Office level (e.g., wiped off) should be decontaminated there.

Contaminated equipment or other contaminated items are not to be placed or stored in areas where food is kept, and decontamination should be accomplished as soon as possible following the incident where contamination occurred.

Decontamination is not to take place in any area where food or drink is consumed. Cloths used to wipe contaminated equipment can be discarded as refuse unless they would somehow become contaminated to the extent that they would be considered regulated waste (see standard). In that case, see Section 2 of this Plan.

3. Personal Protective Equipment

Although field personnel are expected to avoid the handling of blood or other potentially infectious materials as well as contact with surfaces or items contaminated with such materials, some duties may make contact with such items unavoidable (See Section 1).

Maul Electric, Inc. will provide appropriate gloves of proper size, which the Safety Officer and field personnel will carry for those activities, tasks, or procedures are likely to take place. Such gloves are to be replaced as soon as practical when contaminated or as soon as feasible if they become torn, punctured or when their ability to function as a barrier appears to be compromised. These gloves are not to be washed or decontaminated for reuse.

The Safety Officer or field person is to determine the extent of contamination of gloves prior to their removal. If gloves can be considered regulated waste as defined in the Standard (a very rare circumstance), they are to be placed in a regulated waste container. It is possible that such a container may not be available. In this instance, see Section 2.

First Aid supplies to be used by designated First Aid Responders are to include disposable resuscitation masks as well as gloves. Such gloves will be available in the size(s) needed by those expected to function as First Aid Responders. Such equipment is to be used for the employee's protection in cases where the employee is expected to provide ventilatory assistance. It is not anticipated that Safety Officer or other Maul Electric, Inc. personnel will require personal protective equipment other than gloves.

In situations where other equipment would be needed, it is expected that the Safety Officer or field person will avoid such areas. Should situations occur where such exposure would be necessary for one's job performance; this Plan will be revisited and appropriately amended.

4. Regulated Waste

Only in rare circumstances is it anticipated that the duties of field personnel will generate regulated waste.

First Aid supplies to be used by designated First Aid Responders are to include a bag to be used for containment of any regulated waste generated by the employee in the performance of First Aid duties

Disposal of such waste is to be accomplished in accordance with applicable State and Local laws. Where such laws require that the particular waste item be handled by a medical waste disposal company, Maul Electric, Inc. designee will arrange for such disposal.

5. Hepatitis B Vaccination and Post-exposure Evaluation and Follow-up

Maul Electric, Inc. offers the Hepatitis B vaccine and vaccination series to personnel with duties specified in Section 1. Maul Electric, Inc. offers post-exposure evaluation and follow-up following an exposure incident to **any** employee who suffers an exposure incident while performing duties on the job at Maul Electric, Inc. All medical evaluations and procedures are to be made available at no cost to Maul Electric, Inc. personnel, at a reasonable time and place, and under the other conditions set forth in 29 CFR 1910.1030(f).

a. Hepatitis B Vaccination

Maul Electric, Inc. will make the Hepatitis B vaccine available to employees at a local Health Service Facility.

All Maul Electric, Inc. employees whose job duties involve occupational exposure (see Section 1 of this Plan) are to be offered the Hepatitis B vaccination. The vaccine will be made available after the training required in 29 CFR 1910.1030 has been accomplished, and within 10 days of initial assignment of the employee to duties with occupational exposure. It is desirable that all employees with duties such as those described in Section 1 be immunized against Hepatitis B. However, Maul Electric, Inc. realizes that some personnel, even after training, may decline to receive the Hepatitis B vaccine. In such case, the declining Maul Electric, Inc. employee is to sign the declination statement (see Appendix B of this Plan). The employee can receive the vaccine after signing the declination statement if a change of mind occurs and if duties still involve those with occupational exposure. The Office Manager or designee will assure that each employee scheduled for immunization at a Health Service Facility is provided with the written opinion sample format in Appendix C of this Plan.

Any employee receiving vaccination at another site is to be provided with both the written opinion sample format and a copy of the Standard (see Appendix C). These materials are to be taken by the employee to the evaluating physician for completion. The written opinion should be returned to the Office where the employee is assigned. The First Aid provider should obtain a copy of medical records related to Hepatitis B vaccination before departing the facility where vaccination takes place. Field personnel should insert this copy of such records in a copy of Appendix D. Appendix D should then be carried by the field person on any jobsite where occupational exposure could be reasonably anticipated. Should an exposure incident occur, Appendix D, including the Hepatitis B related records, serves as the materials for the evaluating physician and is to be given to the evaluating physician.

2. Post-exposure Evaluation and Follow-up

The Office Manager or designee will provide materials for the evaluating physician found in Appendix D of this Plan to each field person assigned duties discussed in Section 1. Prior to each work activity involving such tasks, the field person is to ensure that the materials to be taken on the jobsite include the Materials for the Evaluating Physician (containing the

Hepatitis B vaccination-related records inserted by the field person). This information is vital should an exposure incident occur.

In anticipation of possible exposure incidents, the Office Manager or designee shall instruct the field personnel to seek medical attention in the same manner that it would be sought should any injury occur during work activities (e.g., emergency room, physician's office, and urgent care clinic).

In the event of an exposure incident (as defined in 29 CFR 1910.1030), the Maul Electric, Inc. employee is to immediately wash any skin with soap and water and flush mucous membranes with water when such areas have had contact with blood or other potentially infectious materials.

The employee should then seek medical attention. It must be realized that any exposure incident is an event for which immediate attention must be sought, as the effectiveness of prophylaxis depends on the immediacy of its delivery. In addition, the employee who has had an exposure incident is to report such incident to his or her supervisor as soon as possible.

The supervisor will inform the Office Manager or designee who will contact the facility where the exposure incident occurred. The Office Manager or designee is to work together with the facility to ascertain the source individual's identity, arrange for testing of the source individual, and communicate with the physician evaluating the Maul Electric, Inc. employee. Following an exposure incident, an Exposure Incident Report (see Appendix D) will be completed by the Maul Electric, Inc. employee. The completion of this report should be done in consultation with the supervisor when the supervisor is immediately available by telephone. In no instance should report completion and physician evaluation be delayed.

The report is to be given by the employee to the evaluating physician. Report information will include:

- (a) A description of the exposed employee's duties as they relate to the exposure incident;
- (b) Documentation of route(s) of exposure and circumstances under which exposure occurred. Through direct input by the employee, the evaluating physician is best able to understand exactly what exposure occurred and therefore direct treatment appropriately.

3. Information Provided to the Evaluating Physician and Procedures Manual

Post-exposure evaluation and follow-up are to be provided to the employee consistent with the requirements of 29 CFR 1910.1030. Therefore, upon presenting for evaluation, the employee will give to the physician the Materials for the Evaluating Physician (Appendix C of this Plan for Hepatitis B vaccination, Appendix D of this Plan for Evaluation following Exposure Incident). The instructions for the physician describe the requirements of 29 CFR 1910.1030 and instruct the physician to give the physician's written opinion to the employee to return to the supervisor. The office to which the employee is assigned will maintain the physician's written opinion. A copy of the actual evaluation results is to be returned by the physician to Maul Electric, Inc.'s Main Office. The evaluation results will become a part of the field personnel's confidential medical record maintained in their personnel in the Medical Records Section. Records regarding any exposure incidents of personnel will be maintained in a confidential manner.

B. Communication of Hazards to Employees

1. Labels and Bags

Maul Electric, Inc. will provide biohazard labels to be affixed to bags containing any contaminated equipment. A bag and biohazard labels are to be carried by First Aid Responders when contamination of equipment is reasonably anticipated. Bags will be disposed of as ordinary refuse unless in the rare instance when they are contaminated to the extent that they are considered regulated waste as defined by the standard. In such case, see Section 2 of this Plan.

2. Information and Training

Personnel whose job duties involve occupational exposure, as specified in Section 1 of this Plan are to participate in Maul Electric, Inc.'s training program for Bloodborne Pathogens at the time of initial assignment to tasks where occupational exposure occurs.

The training program contains all the elements specified in 29 CFR 1910.1030(g) (2). Training will be conducted on an annual basis, and the Office Manager or designated person will ensure that updates are given when there are changes in duties or procedures.

C. Recordkeeping

1. Medical Records

Medical records are to be maintained in the main office, as part of the medical files of field personnel. Such records are maintained in accordance with 29 CFR 1910.20 and are kept confidential.

2. Training Records

Training records are to contain all information specified in 29 CFR 1910.1030(h) (2) and will be maintained for 3 years from the date on which the training occurred. Training records will be held at the main office.

3. Transfer of Records

Maul Electric, Inc. will comply with the requirements of 29 CFR 1910.20(h) involving any transfer of records. Exposure incident records will remain at the Main Office. The employee may request and receive a copy of such records when transferring to another assignment.

III. EVALUATION OF CIRCUMSTANCES SURROUNDING AN EXPOSURE INCIDENT

The evaluation of circumstances surrounding an exposure incident is to be done by the designated safety person.

This evaluation will consist of at least:

- (a) A review of the Exposure Incident Report completed by the Maul Electric, Inc. employee;
- (b) Documentation regarding a plan to reduce the likelihood of a future similar exposure incident;
- (c) Notification of the Main Office and discussion of any similar incidents and planned precautions.

Such reports will be maintained at the Main Office. The Main Office will review these reports on a periodic basis so that reported information can be considered in the review and update of this Plan. In addition, Maul Electric, Inc. will issue an alert to the other jobsites should similar incidents or trends among our various work sites be noted so that further incidents can be anticipated and prevented.

APPENDIX B

DECLINATION STATEMENT

I understand that due to my occupational exposure to blood or other potentially infectious materials I may be at risk of acquiring Hepatitis B virus (HBV) infection. I have been given the opportunity to be vaccinated with Hepatitis B vaccine, at no charge to myself. However, I decline Hepatitis vaccination at this time. I understand that by declining this vaccine, I continue to be at risk of acquiring Hepatitis B, a serious disease. If in the future I continue to have occupational exposure to blood or other potentially infectious materials and I want to be vaccinated with Hepatitis B vaccine, I can receive the vaccination series at no charge to me.

Employee Signature

date

APPENDIX C

WRITTEN OPINION

To the Evaluating Physician:

After you have determined whether there are contra indications to vaccination of this Maul Electric, Inc. employee with Hepatitis B vaccine, please state in the space below **only**

(A) If vaccine was indicated (B) if vaccine was received

(All other findings are to remain confidential and are not to be included on this page)

Please return this sheet to this employee, _____.

(Name of employee)

Thank you for your evaluation of this employee.

Physician's signature

Physician's name (printed)

date

The rest of the text for Appendix C can be found in the December 6, 1991 issue of the **Federal Register**. (FR 56:64175-64182)

APPENDIX D

INSTRUCTIONS FOR THE EVALUATING PHYSICIAN

This Maul Electric, Inc. employee may have suffered an exposure incident as defined in the Bloodborne Pathogens Standard. In accordance with the standard's provision for post exposure evaluation and follow up, the employee presents to you for evaluation. Included to assist you in this evaluation are:

- (A) A copy of 29 CFR 1910.1030, Occupational Exposure to Bloodborne Pathogens;
- (B) A description of the exposed employee's duties as they relate to the exposure incident;
- (C) Documentation of the routes of exposure and circumstances under which exposure occurred;
- (D) Results of the source individual's blood testing, if available; and
- (E) All medical records relevant to this employee's appropriate treatment, including vaccination status.

After completing the evaluation, please:

- (A) Inform the employee regarding the evaluation results and any follow up needed;
- (B) Complete the attached written opinion form and give it to the employee. (This form will be maintained in the office to which the employee is assigned); and
- (C) Send a copy of all evaluation results and records to:

Maul Electric, Inc., PO Box 388, Dayton, NJ, 08810. Labeled as follows:

CONFIDENTIAL: MEDICAL RECORDS

These copies will be maintained as part of the employee's confidential medical record.

Should you have any questions regarding the evaluations or medical records, please contact Maul Electric, Inc.'s Office Manager at (732) 329-4656

EXPOSURE INCIDENT REPORT

(Routes and Circumstances of Exposure Incident)

Please Print

Employee's Name _____ Date _____

Date of Birth _____ SS# _____

Telephone (Business) _____ (Home) _____

Job Title _____

Date of Exposure _____ Time of Exposure _____ AM ___ PM _____

Hepatitis B Vaccination Status _____

Location of Incident _____

Describe what job duties you were performing when the exposure incident occurred

Describe the circumstances under which the exposure incident occurred (what happened that resulted in the incident)

What body fluid(s) were you exposed to?

What was the route of exposure (e.g., mucosal contact, contact with non-intact skin)?

Describe any personal protective equipment in use at time of exposure incident

Did PPE fail? _____ If yes, how?

Identification of source individual(s) (names)

Other pertinent information

WRITTEN OPINION

To the Evaluating Physician:

After your evaluation of this Maul Electric, Inc. employee, please assure that the following information has been furnished to the employee and provide your initials beside the following statements:

(A) _____ The employee has been informed of the results of this evaluation.

(B) _____ The employee has been told about any medical conditions resulting from exposure to blood or other potentially infectious materials, which require further evaluation and treatment.

No other findings are to be included on this report.

Please return this sheet to this employee, _____

(Name of employee)

Thank you for your evaluation of this employee.

Physician's signature

Physician's name (printed)

Date

APPENDIX E

FIRST AID SUPPLIES

In addition to supplies for rendering First Aid Assistance, First Aid Kits should contain:

1. **Disposable resuscitation mask**
2. **Gloves** of sizes needed by personnel performing First Aid
3. **Bags** (at least 2)
4. **Biohazard labels** (at least 2)

In addition, if First Aid Assistance is expected to be rendered at a site where running water may not be available, **antiseptic wipes** should be included in the First Aid Kit.