Bloodborne Pathogens and Exposure Control Plan

BACKGROUND
OSHA requires employers to identify situations and job classifications in which employees may be exposed to blood or other potentially infectious materials, and to provide protection to these employees in the form of engineering controls, personal protective equipment, training, and risk reduction.

POLICY
Enviro-Clean Services, Inc. is committed to providing a safe and healthful work environment for our entire staff. In pursuit of this goal, the following exposure control plan (ECP) is provided to eliminate or minimize occupational exposure to bloodborne pathogens in accordance with OSHA standard 29 CFR 1910.1030, “Occupational Exposure to Bloodborne Pathogens.” The ECP will be accessible to all employees and their representatives.

The Exposure Control Plan (ECP) is a key document to assist our organization in implementing and ensuring compliance with the standard, thereby protecting our employees. This ECP is available for the employee to review upon request and will be updated annually (or as changes may dictate) and includes:
- Determination of employee exposure
- Implementation of various methods of exposure control, including:
  - Universal precautions
  - Engineering and work practice controls
  - Personal protective equipment
  - Housekeeping
- Hepatitis B vaccination
- Post-exposure evaluation and follow-up
- Communication of hazards to employees and training
- Recordkeeping
- Procedures for evaluating circumstances surrounding exposure incidents

Employees covered by the bloodborne pathogens standard shall receive a copy and an explanation of this ECP during their initial training session. It will also be reviewed in their annual refresher training. All employees can review this plan at any time during their work shifts by contacting the Safety and Health Manager. If requested, we will provide an employee with a copy of the ECP free of charge and it shall be provided in a reasonable time, place and manner, and within 15 days of the request.

The Safety and Health Manager is responsible for reviewing and updating the ECP annually or more frequently if necessary to reflect any new or modified tasks and procedures that affect occupational exposure and to reflect new or revised employee positions with occupational exposure.

OBJECTIVE
The objective of Enviro-Clean Services, Inc. Bloodborne Pathogens and Exposure Control Plan is to comply with the Occupational Safety and Health Administration’s (OSHA) Bloodborne Pathogens Standard, 29 CFR 1910.1030, and to eliminate or minimize employee occupational exposure to blood, certain other body fluids, or other potentially infectious materials as defined below:

- Blood means human blood, human blood components, and products made from human blood.

- Bodily fluids means semen, vaginal secretions, cerebrospinal fluid, synovial fluid, pleural fluid, pericardial fluid, peritoneal fluid, amniotic fluid, saliva in dental procedures, any body fluid that is visibly contaminated with blood, and all body fluids in situations where it is difficult or impossible to differentiate between body fluids.

- Other potentially infectious materials means any unfixed tissue or organ (other than intact skin) from a human (living or dead), and human immunodeficiency virus (HIV)-containing cell or tissue cultures, organ cultures,
and HIV- or hepatitis B virus (HBV)-containing culture medium or other solutions; and blood, organs, or other tissues from experimental animals infected with HIV or HBV.

**ASSIGNMENT OF RESPONSIBILITY**

**Program Administrator**
The Safety and Health Manager shall manage the Bloodborne Pathogen and Exposure Control Plan for Enviro-Clean Services, Inc., and maintain all records pertaining to the plan.

**Management**
Enviro-Clean Services, Inc. will provide adequate controls and equipment that, when used properly, will minimize or eliminate risk of occupational exposure to blood or other potentially infectious materials. These shall be provided at no cost to the employees.

Enviro-Clean Services, Inc. management will ensure proper adherence to this plan through periodic audits.

**Supervisors**
Supervisors shall themselves follow and ensure that their employees are trained in and use proper work practices, universal precautions, the use of personal protective equipment, and proper cleanup and disposal techniques.

**Employees**
Employees are responsible for employing proper work practices, universal precautions, personal protective equipment and cleanup/disposal techniques as described in this plan. Employees are also responsible for reporting all exposure incidents to the Safety and Health Manager immediately or within 1 hour. See APPENDIX G: EXPOSURE INCIDENT FORM for documentation.

**Contractors**
Contract employees shall be responsible for complying with this plan, and shall be provided the training described herein by the Safety and Health Manager.

**EMPLOYEE EXPOSURE DETERMINATION**

All job classifications and locations in which employees may be expected to incur occupational exposure to blood or other potentially infectious materials, based on the nature of the job or collateral duties, regardless of frequency, shall be identified and evaluated by the Safety and Health Manager. This list shall be updated as job classifications or work situations change. Exposure determination shall be made without regard to the use of personal protective equipment (employees are considered to be exposed even if they wear personal protective equipment).

**Category I**
Job classifications in which employees are exposed to blood or other potentially infectious materials on a regular basis, and in which such exposures are considered normal course of work, fall into Category I and include those:
- Working in medical facilities.
- Cleaning dedicated First Aid rooms at customer sites.

The Safety and Health Manager shall maintain a list of these types of jobs and the locations in which the work will be performed (see Appendix A).

**Category II**
Job classifications in which employees may have an occasional exposure to blood or other potentially infectious materials, and in which such exposures occur only during certain tasks or procedures that are collateral to the normal job duties, fall into Category II and include those:
• School custodians – every school has been provided with a clean up kit
• General cleaners – certain locations may require infrequent minor clean up
• Working in production areas – limited clean up

The Safety and Health Manager shall maintain a list of these types of jobs and the locations in which the work may be performed (see Appendix B). These lists shall be updated as job classifications or work situations change.

IMPLEMENTATION SCHEDULE AND METHODOLOGY

Compliance Methods

Universal precautions
Universal precautions shall be used at Enviro-Clean Services, Inc. to prevent contact with blood or other potentially infectious materials. All blood or other potentially infectious materials shall be considered infectious, regardless of the perceived status of the source individual.

Engineering Controls and Work Practices
Engineering controls and work practice controls will be used to prevent or minimize exposure to bloodborne pathogens. The specific engineering controls and work practice controls used are listed below:

- Biohazard waste is not handled in any manner
- Sharps and needles any disposal containers of such are not handled.

Where occupational exposure remains after implementation of these controls, personal protective equipment shall also be used.

Personal Protective Equipment (PPE)
PPE is provided to our employees at no cost to them. Training in the use of the appropriate PPE for specific tasks or procedures is provided by the Safety and Health Manager and/or Area Manager, Assistant Manager, Contract Manager.

The types of PPE available to employees are as follows:

- Latex or rubber gloves
- Safety glasses
- Face shields
- Steel toe footwear
- Fall protection equipment
- Back supports

PPE requirements are job specific. PPE is provided at the job site during initial orientation regarding work at that specific job site.

All employees using PPE must observe the following precautions:

- Wash hands immediately or as soon as feasible after removing gloves or other PPE.
- Remove PPE after it becomes contaminated and before leaving the work area.
- Used PPE, such as gloves, may be disposed of in refuse containers
- Wear appropriate gloves when it is reasonably anticipated that there may be hand contact with blood or other potentially infectious materials (OPIM), and when handling or touching contaminated items or surfaces; replace gloves if torn, punctured or contaminated, or if their ability to function as a barrier is compromised.
Utility gloves may be decontaminated for reuse if their integrity is not compromised; discard utility gloves if they show signs of cracking, peeling, tearing, puncturing, or deterioration.

- Never wash or decontaminate disposable gloves for reuse.
- Wear appropriate face and eye protection when splashes, sprays, spatters, or droplets of blood or OPIM pose a hazard to the eye, nose, or mouth.

**Hand Washing Facilities**

Hand washing facilities shall be made available and readily accessible to all employees who may incur exposure to blood or other potentially infectious materials. Where hand washing facilities are not feasible, Enviro-Clean Services, Inc. will provide an antiseptic cleanser in conjunction with clean cloth/paper towels or antiseptic towelettes.

When these alternatives are used, employees shall wash their hands with soap and running water as soon as feasible.

**Work Area Restrictions**

In work areas where there is a reasonable risk of exposure to blood or other potentially infectious materials, employees shall not eat, drink, apply cosmetics or lip balm, smoke, or handle contact lenses. Food and beverages shall not be kept in refrigerators, freezers, shelves, cabinets, or on counter tops or bench tops where blood or other potentially infectious materials may be present.

All processes and procedures shall be conducted in a matter that will minimize splashing, spraying, splattering, and generation of droplets of blood or other potentially infectious materials.

**Personal Protective Equipment (PPE)**

- **PPE Provision**

  The Safety and Health Manager shall ensure that the provisions regarding personal protective equipment described in this plan are met and maintained.

  When there is occupational exposure, Enviro-Clean Services, Inc. shall provide, at no cost to the employee, appropriate personal protective equipment such as, but not limited to, gloves, gowns, laboratory coats, face shields or masks and eye protection, and mouthpieces, resuscitation bags, pocket masks, or other ventilation devices. Personal protective equipment shall be chosen based on the anticipated exposure to blood or other potentially infectious materials. Protective equipment shall be considered appropriate only if it does not permit blood or other potentially infectious materials to pass through or reach an employees’ clothing, skin, eyes, mouth, or other mucous membranes under normal and proper conditions of use and for the duration of time that the equipment will be used.

  A list of personal protective equipment and associated tasks for Enviro-Clean Services, Inc. can be found in Appendix D of this plan.

- **PPE Use**

  The Safety and Health Manager and supervisors shall ensure that employees use appropriate PPE where required by OSHA.

- **PPE Accessibility**

  The Safety and Health Manager shall ensure that appropriate PPE in the necessary sizes is readily accessible at the work site or is issued at no cost to employees. Hypoallergenic gloves, glove liners, powderless gloves, or other similar alternatives shall
be readily accessible to those employees who are allergic to the gloves normally provided.

- **PPE Cleaning, Laundering and Disposal**
  All PPE shall be cleaned, laundered, and disposed of by Enviro-Clean Services, Inc. at no cost to the employees. Enviro-Clean Services, Inc. will also make all necessary repairs and replacements at no cost to employees.

All garments penetrated by blood or other potentially infectious materials shall be removed immediately or as soon as feasible. All PPE shall be removed before leaving the work area.

When PPE is removed, it shall be placed in appropriately designated areas or containers for storage, washing, decontamination, or disposal.

Enviro-Clean Services, Inc. shall repair or replace personal protective equipment as needed to maintain its effectiveness, at no cost to the employee.

- **Types of PPE**
  
  - **Gloves**
    Disposable gloves are not to be washed or decontaminated for reuse, and are to be replaced as soon as possible when they become contaminated. Gloves that become torn or punctured (or their ability to function as a barrier is otherwise compromised) shall be replaced immediately or as soon as feasible.

    Utility gloves may be decontaminated for reuse if the integrity of the glove is uncompromised. Utility gloves shall be disposed of properly if they are cracked, peeling, torn, punctured, or they exhibit other signs of deterioration or inability to function as a barrier without compromise.

  - **Eye and Face Protection**
    Masks worn in combination with eye protection devices (such as goggles or glasses with solid side shield, or chin-length face shields) are required when the occurrence of splashes, splatters, or droplets of blood or other potentially infectious materials can reasonably be anticipated to contaminate an employee’s eye, nose, or mouth.

    Situations at Enviro-Clean Services, Inc. where eye and face protection is required include:

    a) **Restroom cleaning**
    b) **First aid room cleaning**
    c) **Using a sprayer propel a liquid**
    d) **Cleaning a medical facility**
    e) **When in a production area or plant area**
    f) **When adding chemicals to water**
    g) **When filling spray bottles**
    h) **When filling mop buckets or scrubbers**

  - **Other PPE**
    Additional protective clothing (such as lab coats, gowns, aprons, clinic jackets, or similar outer garments) shall be worn in instances when gross contamination can reasonably be expected. The following situations require additional protective clothing:

    a) **Cleaning certain medical facilities**
Housekeeping
Each facility shall be cleaned and decontaminated regularly and as needed in the event of a gross contamination. See Appendix E for cleaning schedule and required cleaning materials. All contaminated work surfaces, bins, pails, cans, and similar receptacles shall be inspected and decontaminated regularly as described in Appendix E.

All equipment and environmental and working surfaces shall be cleaned and decontaminated after contact with blood or other potentially infectious materials.

Contaminated work surfaces shall be decontaminated with an appropriate disinfectant after completion of procedures; immediately or as soon as feasible when surfaces are overtly contaminated or after any spill of blood or other potentially infectious materials; and at the end of the work shift if the surface may have become contaminated since the last cleaning.

Protective coverings, such as plastic wrap, aluminum foil, or imperviously-backed absorbent paper used to cover equipment and environmental surfaces, shall be removed and replaced as soon as feasible when they become overtly contaminated or at the end of the workshift if they may have become contaminated during the shift.

Any potentially contaminated glassware shall not be picked up directly with the hands. Reusable sharps that are contaminated with blood or other potentially infectious materials shall not be stored or processed in a manner that requires employees to reach by hand into the containers where sharps are placed.

Handling blood and/or other potentially infectious materials and blood soaked bandages shall be placed in a leak proof bag/container which prevents leakage during collection, handling, processing, storage, transport, or shipping. Bloodborne Pathogens Clean-up kits will be readily available. See Appendix E for contents of a BBP Kit.

Regulated Waste Disposal
Disposal of all infectious and regulated waste shall be in accordance with applicable federal, state, and local regulations.

Sharps
Contaminated sharps shall be discarded immediately by customer employees and as soon as feasible in containers that are closable, puncture resistant, leak proof on sides and bottom, and labeled or color-coded.

During use, containers for contaminated sharps shall remain upright throughout use, shall be easily accessible to employees, and shall be located as close as feasible to the immediate area where sharps are used or can be reasonably anticipated to be found (including laundry areas). The customer shall replace sharps containers routinely and not allow them to overfill.

When moving sharps containers from the area of use, the containers shall be closed immediately prior to removal or replacement to prevent spillage or protrusion of contents during handling, storage, transport, or shipping. Sharps containers shall be placed in a secondary container if leakage of the primary container is possible. The second container shall be closeable, constructed to contain all contents, and shall prevent leakage during handling, storage, transport, or shipping. The secondary container shall be labeled or color-coded to identify its contents.

Reusable containers shall not be opened, emptied, or cleaned manually or in any other manner that would expose employees to the risk of injury from a puncture.

Laundry
Laundry contaminated with blood or other potentially infectious materials shall be handled as little as possible. Such laundry shall be placed in appropriately marked bags (biohazard labeled or color-coded
bags) at the location where it was contaminated. Contaminated laundry shall not be sorted or rinsed in the area of contamination

**Hepatitis B Vaccines and Post-Exposure Evaluation and Follow Up**

**A. General**

Enviro-Clean Services, Inc. will make the Hepatitis B vaccine and vaccination series available to all employees who have the potential for occupational exposure, as well as post-exposure follow up to employees who have experienced an exposure incident.

The Safety and Health Manager shall ensure that all medical evaluations and procedures involved in the Hepatitis B vaccine and vaccination series and post-exposure follow up, including prophylaxis are:

- made available at no cost to the employee;
- made available to the employee at a reasonable time and place;
- performed by or under the supervision of a licensed physician or other licensed healthcare professional; and
- provided in accordance with the recommendations of the United States Public Health Service.

An accredited laboratory shall conduct all laboratory tests at no cost to the employee.

**Hepatitis B Vaccination**

The Safety and Health Manager shall manage the Hepatitis B vaccination program. Enviro-Clean Services, Inc. has contracted with Healthcare Providers throughout the Enviro-Clean service area.

**Category I Employees**

The Hepatitis B vaccination shall be made available to an affected Category I employee after he or she has received training in occupational exposure and within 10 working days of initial assignment to job duties that involve exposure. Exceptions to the administration of the Hepatitis B vaccination include situations where an employee has previously received the complete Hepatitis B vaccination series, antibody testing has revealed that the employee is immune, or the vaccine is contraindicated for medical reasons.

Participation in a pre-screening program shall not be a prerequisite for an affected employee to receive the Hepatitis B vaccination. If an employee initially declines the Hepatitis B vaccination, but later decides to accept the vaccination and is still covered under the OSHA standard, the vaccination shall then be made available.

All employees who decline the Hepatitis B vaccination shall sign a waiver indicating their refusal (Appendix F), as required by OSHA. If the United States Public Health Service recommends a routine booster dose of Hepatitis B vaccine, this shall also be made available free of charge to affected employees.

**Category II Employees**

The Hepatitis B vaccination series shall be made available and administered to Category II employees no later than 24 hours after an exposure incident (as per OSHA Letter of Interpretation, November 1, 2000). All employees who decline the Hepatitis B vaccination shall sign a waiver indicating their refusal (Appendix F).

**Post-Exposure Evaluation and Follow Up**

All employees must report all exposure incidents to their Area Manager/Contract Manager or the Safety and Health Manager immediately. The Safety and Health Manager shall investigate and document each exposure incident. Following a report of an exposure incident, the exposed employee shall immediately receive a confidential post-exposure evaluation and follow up, to be provided by the health care provider used by Enviro-Clean in that service area.
The post-exposure evaluation and follow up shall include the following elements, at a minimum:

- Documentation of the route of exposure, and the circumstances under which the exposure occurred.
- Identification and documentation of the source individual, unless it can be established that identification is infeasible or prohibited by state or local law.
- The source individual’s blood shall be tested and documented as soon as feasible and after consent is obtained (if consent is required) in order to determine HBV and HIV infectivity. If consent cannot be obtained, The Safety and Health Manager shall establish and document that legally required consent cannot be obtained.
- When the source individual is already known to be infected with the Hepatitis B virus (HBV) or human immunodeficiency virus (HIV), testing for the source individual’s known HBV or HIV status need not be repeated.
- Results of the source individual’s testing shall be made available to the exposed employee, and the employee shall be informed of applicable laws and regulations concerning disclosure of the identity and infectious status of the source individual.
- The exposed employee’s blood shall be collected as soon as feasible and tested after consent is obtained.
- The exposed employee shall be offered the option of having their blood tested for HBV and HIV serological status. The blood sample shall be preserved for up to 90 days to allow the employee to decide if their blood should be tested for HBV and HIV serological status.

Names of employees that contract HIV, Hepatitis, or tuberculosis shall not be recorded on the OSHA 300 log.

Information Provided to the Healthcare Professional

After an exposure incident occurs, the Safety and Health Manager shall ensure that the healthcare professional responsible for the exposed employee’s Hepatitis B vaccination, as well as the healthcare provider providing the post-exposure evaluation, if different, are provided with the following:

- a copy of 29 CFR 1910.1030, OSHA’s Bloodborne Pathogen Standard, with emphasis on the confidentially requirements contained therein;
- a written description of the exposed employee’s duties as they relate to the exposure incident;
- written documentation of the route of exposure and circumstances under which the exposure occurred;
- results of the source individual’s blood testing, if available; and
- all medical records relevant to the appropriate treatment of the employee, including vaccination status.

Healthcare Professional’s Written Opinion

The Safety and Health Manager shall obtain and provide the exposed employee a copy of the evaluating healthcare professional’s written opinion within 15 days of completion of the evaluation. The healthcare professional’s written opinion for HBV vaccination shall be limited to whether HBV vaccination is indicated for the employees, and if the employee has received said vaccination.

The healthcare professional’s written opinion for post-exposure follow up shall be limited to ONLY the following information:

- a statement that the employee has been informed of the results of the evaluation; and
- a statement that the employee has been told about any medical conditions resulting from exposure to blood or other potentially infectious materials that require further evaluation or treatment.
Other findings or diagnosis resulting from the post-exposure follow up shall remain confidential and shall not be included in the written report.

Communications of Hazards to Employees
The Safety and Health Manager shall ensure that the customer follows OSHA regulations and assures that biohazard labels are affixed to containers of regulated waste, refrigerators, and freezers containing blood or other potentially infectious materials. Labels shall also be affixed to any other containers used to store, transport, or ship blood or other potentially infectious materials. Please refer to Enviro-Clean Services, Inc.’s Hazard Communication Program chapter beginning on page 147.

Enviro-Clean Services, Inc. will assure that customers use the following labels and signs to communicate hazards to employees:

(1) Labels and Signs
   (i) Labels
      (A) Warning labels shall be affixed to containers of regulated waste, refrigerators and freezers containing blood or other potentially infectious material; and other containers used to store, transport or ship blood or other potentially infectious materials, except as provided in paragraph (g)(1)(i)(E), (F) and (G).

      (B) Labels required by this section shall include the following legend:

      ![BIOHAZARD Image]

      (C) These labels shall be fluorescent orange or orange-red or predominantly so, with lettering and symbols in a contrasting color.

      (D) Labels shall be affixed as close as feasible to the container by string, wire, adhesive, or other method that prevents their loss or unintentional removal.

      (E) Red bags or red containers may be substituted for labels.

      (F) Containers of blood, blood components, or blood products that are labeled as to their contents and have been released for transfusion or other clinical use are exempted from the labeling requirements of paragraph (g).

      (G) Individual containers of blood or other potentially infectious materials that are placed in a labeled container during storage, transport, shipment or disposal are exempted from the labeling requirement.

      (H) Labels required for contaminated equipment shall be in accordance with this paragraph and shall also state which portions of the equipment remain contaminated.

      (I) Regulated waste that has been decontaminated need not be labeled or color coded.
(ii) Signs

(A) Enviro-Clean Services, Inc. shall ensure that the customer posts signs at the entrance to work areas specified in paragraph (e), HIV and HBV Research Laboratory and Production Facilities, which shall bear the following legend:

![Biohazard Symbol]

(Name of the Infectious Agent)
(Special requirements for entering the area)
(Name, telephone number of the laboratory director or other the Safety and Health Manager.)

(B) These signs shall be fluorescent orange-red or predominantly so, with lettering and symbols in a contrasting color.

Training

The Safety and Health Manager shall ensure that training is provided at the time of initial assignment to tasks where occupational exposure to blood or other potentially infectious materials may occur. Training shall be repeated every 12 months, or when there are any changes to tasks or procedures affecting an employee’s occupational exposure. Training shall be tailored to the education level and language of the affected employees, and offered during the normal work shift. Training shall be interactive and shall be provided as follows:

(A) At the time of initial assignment to tasks where occupational exposure may take place;

(B) Within 90 days after the effective date of the criterion; and

(C) At least annually thereafter.

(D) For employees who have received training on bloodborne pathogens in the year preceding the effective date of the criterion, only training with respect to the provisions of the criterion which were not included need be provided.

(E) Annual training for all employees shall be provided within one year of their previous training.

(F) Enviro-Clean Services, Inc. shall provide additional training when changes such as modification of tasks or procedures or institution of new tasks or procedures affect the employee’s occupational exposure. The additional training may be limited to addressing the new exposures created.

(G) Enviro-Clean Services, Inc. shall provide a training program to employees who have no prior experience in handling human pathogens. Initial work activities shall not include the handling of infectious agents. A progression of work activities shall be assigned as techniques are learned and proficiency is developed.

(H) The following issues will be addressed in the training program:
   i. a copy of 29 CFR 1910.1030, OSHA’s Bloodborne Pathogen Standard;
   ii. a discussion of the epidemiology and symptoms of bloodborne diseases;
   iii. an explanation of the modes of transmission of bloodborne pathogens;
   iv. an explanation of Enviro-Clean Services, Inc.’s Bloodborne Pathogen & Exposure Control Plan, and how employees can obtain a copy of the plan;
v. a description and recognition of tasks that may involve exposure;
vi. an explanation of the use and limitations of the methods employed by Enviro-Clean Services, Inc. to reduce exposure (such as engineering controls, work practices, and personal protective equipment);

vii. information about the types, use, location, removal, handling, decontamination, and disposal of personal protective equipment;

viii. an explanation of the basis of selection of personal protective equipment;

ix. information about the Hepatitis B vaccination (including efficacy, safety, method of administration, and benefits), as well as an explanation that the vaccination will be provided at no charge to the employee;

x. instruction on the appropriate actions to take and persons to contact in an emergency involving blood or other potentially infectious materials;

xi. an explanation of the procedures to follow if an exposure incident occurs, including the method of reporting and medical follow up;

xii. information on the post-incident evaluation and follow up required for all exposure incidents; and

xiii. an explanation of signs, labels, and color-coding systems.

The person conducting the training shall be knowledgeable in the subject matter.

Recordkeeping

Medical Records
The Safety and Health Manager shall maintain medical records as required by 29 CFR 1910.1020 in the corporate office in Holland, Michigan. All records shall be kept confidential and shall be retained for at least the duration of employment plus 30 years.

The Safety and Health Manager shall also ensure that all contracts with healthcare providers for Hepatitis B vaccinations and post-exposure evaluations and follow ups stipulate any OSHA recordkeeping and retention requirements.

Medical records shall include:

- name and social security number of the employee;
- a copy of the employee’s HBV vaccination status, including the dates of vaccination;
- a copy of all results of examinations, medical testing, and follow-up procedures; and
- a copy of the information provided to the healthcare professional, including a description of the employee’s duties as they relate to an exposure incident, and documentation of the routes and circumstances of an exposure.

Training Records
The Safety and Health Manager shall maintain training records for three years from the date of training.

Records shall be kept in the corporate office in Holland, Michigan and shall include:

- the dates of the training sessions;
- an outline describing the material presented;
- the names and qualifications of persons conducting the training; and
- the names and job titles of all persons attending the training sessions.

Availability of Records
Whenever an employee (or designated representative) requests access to a record, Enviro-Clean Services, Inc. shall provide access to said employee’s records in a reasonable time, place, and manner in accordance with 29 CFR 1910.1020(e). An employee (or designated representative) will only be given access to his or her own records.
Transfer of Records
If Enviro-Clean Services, Inc. ceases to do business and there is no successor employer to receive and retain the records for the prescribed period, The Safety and Health Manager shall contact the Director of the National Institute for Occupational Safety and Health (NIOSH) three months prior to cessation of business for instruction on final disposition of the records.

(i) Enviro-Clean Services, Inc. shall ensure that all records required to be maintained by this section shall be made available upon request to the Assistant Secretary and the Director for examination and copying.
(ii) Employee training records required by this paragraph shall be provided upon request for examination and copying to employees, to employee representatives, to the Director, and to the Assistant Secretary.
(iii) Employee medical records required by this paragraph shall be provided upon request for examination and copying to the subject employee, to anyone having written consent of the subject employee, to the Director, and to the Assistant Secretary in accordance with 29 CFR 1910.1020(h)

The Safety and Health Manager shall review this Bloodborne Pathogen and Exposure Control Plan for effectiveness at least annually and as needed to incorporate changes to the standard or changes in the work place.
Appendix A
Category I Job Classification/Expected Exposure List
Enviro-Clean Services, Inc.

At Enviro-Clean Services, Inc., the following job classifications are expected to incur occupational exposure to blood or other possibly infectious materials:

<table>
<thead>
<tr>
<th>Job Classification</th>
<th>Department/Location</th>
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<tbody>
<tr>
<td>Safety and Health Manager</td>
<td>Safety</td>
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<tr>
<td>Custodian/Janitor</td>
<td>Operations</td>
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<tr>
<td>Area Manager</td>
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<tr>
<td>Assistant Manager</td>
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<td>Contract Manager</td>
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<tr>
<td>Cleaners of Medical Facilities</td>
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</tbody>
</table>
Appendix B
Category II Job Classification/Possible Exposure List
Enviro-Clean Services, Inc.

At Enviro-Clean Services, Inc., the following job classifications may incur occupational exposure to blood or other possibly infectious materials during certain tasks or procedures:

<table>
<thead>
<tr>
<th>Job Classification</th>
<th>Task/Procedure</th>
<th>Department/Location</th>
</tr>
</thead>
<tbody>
<tr>
<td>Administration Staff</td>
<td>Assisting in cleaning up blood spills/bodily fluids</td>
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<tr>
<td>Janitorial Staff</td>
<td>Assisting in cleaning up blood spills/bodily fluids</td>
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<tr>
<td>First Responders</td>
<td>Responding to medical emergency in a non-healthcare environment</td>
<td></td>
</tr>
</tbody>
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Appendix C
Sharps Injury Log
Enviro-Clean Services, Inc.
For Period Ending: ________________

<table>
<thead>
<tr>
<th>Date Entered</th>
<th>Date &amp; Time of Incident</th>
<th>Type &amp; Brand of Device</th>
<th>Department or Work Area Where Incident Occurred</th>
<th>Description of Incident</th>
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Retain Until ___________________ (five years after end of log year)
Appendix D
Personal Protective Equipment/Task List
Enviro-Clean Services, Inc.

<table>
<thead>
<tr>
<th>Job Classification</th>
<th>Task/Procedure</th>
<th>Type of PPE to be Used</th>
<th>PPE to be Issued By</th>
</tr>
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<tbody>
<tr>
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Appendix E

Cleaning and Decontamination Schedule

Enviro-Clean Services, Inc.

Under the Bloodborne Standard, each work area must be kept clean and sanitary and a cleaning schedule implemented. This written schedule must address locations within the facility, types of surfaces to be cleaned, and tasks or procedures to be performed.

The following schedule describes work areas at Enviro-Clean Services, Inc. that should be decontaminated, decontamination frequency and method, and required types of cleaning. *Information concerning usage of protective coverings used to help keep surfaces free of contamination (such as plastic wrap) should be included.*

<table>
<thead>
<tr>
<th>Work Area/Equipment</th>
<th>Cleaning and Decontamination Frequency</th>
<th>Type of Cleaners or Supplies to be Used</th>
<th>Method of Cleaning to be Used</th>
<th>The Safety and Health Manager</th>
</tr>
</thead>
<tbody>
<tr>
<td>Example: Workbench</td>
<td>Daily and after spills, or when contaminated</td>
<td>10% bleach</td>
<td>Using disposal wipes, wipe bench tops with a solution of 10% bleach.</td>
<td>John Smith</td>
</tr>
</tbody>
</table>

Bloodborne Pathogens Clean-up Kit should contain, as a minimum:

- (1) Fluid control solidifier, 21 gm
- (3) Disposable clean-up towels
- (2) Exam quality gloves, 1 pair
- (3) Antiseptic cleansing wipes (sting free)
- (2) 24''x24'' Biohazard bags, 10 gallon capacity
- (2) 5''x8'' Germicidal (kills germs) wipe, covers 7.5 sq. ft
- (2) Clear bags w/twist ties
- (1) Disposable bonnet
- (1) Disposable gown w/full sleeves
- (1) Eye shield with ear loop mask
- (1) 8'' Biohazard scoop
APPENDIX G
EXPOSURE INCIDENT FORM

In the event of an exposure incident, the information on this form must be completed. The information provided below is intended to assist in evaluating the control methods used and to prevent future employee exposures.

Name of Person: ________________________________ Department __________
Incident Date __________ Time ___________
Incident: Mark in each column, as appropriate

<table>
<thead>
<tr>
<th>Incident:</th>
<th>Injury type:</th>
<th>Body Part Injured:</th>
</tr>
</thead>
<tbody>
<tr>
<td>☐ Cut:</td>
<td>☐ Abrasion</td>
<td>☐ Finger</td>
</tr>
<tr>
<td>☐ Exposure:</td>
<td>☐ Laceration</td>
<td>☐ Hand</td>
</tr>
<tr>
<td>☐ Body Fluids</td>
<td>☐ Puncture</td>
<td>☐ Arm</td>
</tr>
<tr>
<td>☐ Infectious Material</td>
<td>☐ Mucous Membrane</td>
<td>☐ Eye</td>
</tr>
<tr>
<td>☐ Other __________</td>
<td>☐ Other __________</td>
<td>☐ Other __________</td>
</tr>
</tbody>
</table>

Description of Incident

Protective equipment used:
☐ Gloves            ☐ Protective Sleeves            ☐ Other
☐ Goggles           ☐ Lab Coat
☐ Face Mask/shield  ☐ Gown

Seen by:
☐ Safety and Health Manager
☐ No Medical Treatment sought
☐ Emergency Treatment Center

What changes need to be made to prevent reoccurrence?

Report prepared by: ________________________________
Position ________________________________
HEPATITIS B IMMUNIZATION AUTHORIZATION

Employee Name: ______________

I give the above named employee authorization to receive the “Hepatitis B” vaccine series at the __________ County Health Department.

If you have any questions, please feel free to contact Enviro-Clean’s Human Resources Department at 616-392-3775.

or
Toll Free 866-561-4017

County Health Department Instructions

Bill to:
Enviro Clean Services
PO Box 2818
Holland MI 49422
BLOODBORNE DISEASE AWARENESS POLICY
HEPATITS B
CONSENT FORM

1. I am receiving a Hepatitis B immunization.
2. The vaccine against Hepatitis B is prepared from recombinant yeast cultures and is free of association with human blood or blood products.
3. If I am allergic to yeast or thimerasol (a common product used in eye wash solution), I should not receive this vaccine.
4. If I have serious, active infection, I should not receive this vaccine.
5. If I am on hemodialysis, I should not receive this vaccine without further evaluation.
6. If I am pregnant, or trying to become pregnant, or breast feeding, I must obtain authorization from my personal physician before receiving this vaccine.
7. If I have a drug or undergone treatment that lowers the body’s resistance to infection (e.g. cortisone, prednisone, certain anticancer drugs or irradiation), I should not take this vaccine without further evaluation.
8. If I have an immune deficiency, I should not take this vaccine until I am further evaluated.
9. If I have problems with my heart or lungs, I should not take this vaccine until I am further evaluated.
10. If I have any bleeding disorder that prevents me from receiving an intramuscular short I should not have this vaccine without further evaluation.
11. I have been informed regarding Hepatitis B and Hepatitis B vaccine.

I have been notified of my susceptibility to Hepatitis B and have been made aware of the consequences to myself, other staff members, patients and any unborn child, as well as the fact that my employer strongly urges me to obtain a Hepatitis B vaccination. I have had a chance to ask questions which were answered to my satisfaction.

Print Name _________________________ Date ________________

Employee Signature _____________________________________________

1st Dose Date _______ 2nd Dose Date _______ 3rd Dose Date _______
BLOODBORNE DISEASE AWARENESS POLICY
HEPATITIS B
DECLINATION FORM

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 B vaccination at this time. I understand by declining this vaccine, I continue to be at risk of acquiring hepatitis B, a serious disease. If in the future while still employed by Enviro-Clean Services, Inc., 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.

Print Name _________________________ Date ________________

Employee Signature _____________________________________________