

## **6.7.1 Exposure Control Plan for employees of Amsys Energy with Occupational Exposure to Bloodborne Pathogens**

**A. Purpose.** This instruction provides for uniform policy for protection of Amsys Energy personnel who, as part of their job, face reasonably anticipated

exposure to bloodborne pathogens.

**B. Scope.** This instruction applies to all Amsys Energy activities.

**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.** Supervision shall use this Plan to ensure that Amsys Energy personnel who have occupational exposure to bloodborne pathogens are afforded protection in accordance with 29 CFR 1910.1030. Access to a copy of the exposure control plan shall be provided in a reasonable time, place, and manner.

### **I. EXPOSURE DETERMINATION**

All 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. Through interviews, surveys, and careful consideration of expected activities of employees, certain groups of tasks have been identified as those where occupational exposure could be reasonably anticipated. These include handling equipment contaminated with blood or other potentially infectious materials or other devices which require the employee to make contact with contaminated equipment. Employees 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. Employees who must engage in such activities are therefore covered by this Plan. Amsys Energy

employees designated as First Aid Responders are also 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.

## **II. METHODS OF IMPLEMENTATION**

### **1. Methods of Compliance**

1.1 Universal Precautions Amsys Energy personnel are not to handle contaminated objects unless absolutely necessary for performance of an inspection. For example, employees shall not place hands in a trash can or laundry bag where regulated waste or contaminated laundry may be present.

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

### **1.2 Work Practice Controls**

**1.2.1 Hand washing Facilities** Antiseptic towelettes will be provided by the company to all consultants/trainers with duties in Section I of this Plan. These towelettes are to be carried by employees on jobs 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 towelettes 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 II.A.4 of this Plan. When such towelettes are used, hands or other skin surfaces cleansed using towelettes 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.

**1.2.2 Contaminated Equipment** In order to prevent occupational exposure to

personnel, equipment and sampling media (e.g., charcoal tubes) that may become contaminated with blood or other potentially infectious materials are to be decontaminated (e.g., wiped off with bleach or other disinfectant, as determined by the consultant/trainer) 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 inspection or 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 II.A.4 of this Plan.

**1.3 Personal Protective Equipment** Although employees 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 I). Amsys Energy will provide appropriate gloves of proper size which the employee will carry on those jobs where such 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 consultant/trainer 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 located in the facility inspected. It is possible that such a container may not be available (e.g., in a facility not in compliance with 29 CFR 1910.1030 regarding regulated waste). In this instance, see section II.A.4. 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 ventilator assistance. It is not anticipated that employees will require personal protective equipment other than gloves. In situations where other equipment would be needed, it is expected that the employee 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. When the possibility of occupational exposure is present, PPE is to be provided at no cost to the employee.

**1.4 Regulated Waste Only** in rare circumstances is it anticipated that the duties of an employee will generate regulated waste. For example, gloves which are worn to assist and injured person who has become contaminated with blood from an accident scene procedure may rarely be contaminated to the extent that they are regulated waste. Such gloves are to be disposed of in the facilities nearest regulated waste container. If no such container is available at the facility, the employee is to discard contaminated gloves and other regulated waste in an Amsys Energy-supplied bag. Such bags will be supplied to all crews performing tasks and procedures where regulated waste could be generated (See Section I). Employees are to note that regulated waste includes other materials contaminated to the extent that they can be defined as such in 29 CFR 1910.1030 (e.g., cloths used to clean contaminated sampling devices and which become saturated with blood). 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. The bag containing regulated waste is to be returned to the Amsys Energy office by the employee, where the Office will arrange for appropriate removal of such waste. 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, the Amsys Energy Office Manager or designee will arrange for such disposal.

## **2.0 Hepatitis B Vaccination and Post-exposure Evaluation and Follow-up**

Amsys Energy offers the hepatitis B vaccine and vaccination series to personnel with duties specified in Section I. Amsys Energy 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 Amsys Energy. All medical evaluations and procedures are to be made available at no cost to Amsys Energy personnel, at a reasonable time and place, and under the other conditions set forth in 29 CFR 1910.1030(f).

**2.1 Hepatitis B Vaccination** Amsys Energy will make the hepatitis B vaccine available to employees at the Public Health Service facility where physical examinations are performed. In rare cases, an office may be in a location that is remote from the nearest Public Health Service facility. If an employee is not otherwise due to undergo a physical examination, the Office Manager or designee in the remote location may determine that it is cost effective for the employee to be offered hepatitis B vaccinations at a local facility. In such case, the office manager or designee, in consultation with the President, is to make such arrangements. All Amsys Energy employees whose job duties involve occupational exposure, (see Section I 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 I be immunized against hepatitis B. However, Amsys Energy realizes that some personnel, even after training, may decline to receive the hepatitis B

vaccine. In such case, the declining Amsys Energy employee is to sign the declination statement which is Appendix A of 29 CFR 1910.1030 (see also 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 Public 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. A copy of medical records related to hepatitis B vaccination should be obtained by the employee or first aid provider before departing the facility where vaccination takes place. The compliance officer should insert this copy of such records in a copy of Appendix D. Appendix D should then be carried by the compliance officer on any inspection 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.

**2.1.1 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 consultant/trainer assigned duties discussed in Section I. Prior to each inspection involving such tasks, the compliance officer is to ensure that the materials to be taken on the activity include the Materials for the Evaluating Physician (containing the hepatitis B vaccination-related records inserted by the employee. This information is vital should an exposure incident occur. In anticipation of possible exposure incidents, The Office Manager or designee shall instruct the employee to seek medical attention in the same manner that it would

be sought should any injury occur during an activity (e.g., emergency room, physician's office, urgent care clinic). In the event of an exposure incident (as defined in 29 CFR 1910.1030), the Amsys Energy 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 as well as Amsys Energy 's Safety Office. The Office Manager or designee is to work together with the facility, with the assistance of Safety Office if needed, to ascertain the source individual's identity, arrange for testing of the source individual, and communicate with the physician evaluating the Amsys Energy employee. Following an exposure incident, an Exposure Incident Report (see Appendix D) will be completed by the Amsys Energy 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; and (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.

**2.1.2 Information Provided to the Evaluating Physician** 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 Amsys Energy 's Safety Office. The evaluation results will become a part of the employee's confidential medical record maintained in the Safety Office.

### **3.0 Communication of Hazards to Employees**

**3.1 Labels and Bags** Amsys Energy will provide biohazard labels to be affixed to bags containing any contaminated equipment until they can be returned to an Amsys Energy office or shipped to another facility (see section II.A.2.b. of this Plan). Biohazard labels are to be carried by each crew performing an activity where contamination of equipment is likely. Amsys Energy will provide appropriate bags for containment of any regulated waste or contaminated equipment generated by crews performing procedures in section I of this Plan. A bag and biohazard labels are to be carried by the crew when there is any question of appropriate handling of regulated waste by the activity or when contamination of equipment is reasonably anticipated. In addition, a bag and biohazard labels will be provided in any First Aid kit expected to be used by designated First Aid Responders. 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 II.A.4 of this Plan.

**3.2 Information and Training** Personnel whose job duties involve occupational

exposure, as specified in section I of this Plan are to participate in Amsys Energy '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). In addition, the Office Manager or designee will determine where site- specific training is needed and will ensure that such training is provided. Training will be conducted on an annual basis, and Office Manager will ensure that updates are given when there are changes in duties or procedures.

#### **4.0 Recordkeeping**

**4.1 Medical Records** Medical records are to be maintained by the Safety Office, as part of the medical files of employees. Such records are maintained in accordance with 29 CFR 1910.20 and are kept confidential. In the case of certain personnel ( who are also designated First Aid Responders), medical records will be maintained along with other medical records at the Public Health Service facility which provides service to the local office. A copy will be maintained confidentially in the Safety Office.

**4.2 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 by the Amsys Energy Office or location at which training took place. Accurate records for each employee with occupational exposure must be maintained for at least the duration of employment plus 30 years.

**4.3 Transfer of Records** Amsys Energyt will comply with the requirements of 29 CFR 1910.20(h) involving any transfer of records. Exposure incident records will remain at the Office where the employee was assigned when the incident occurred, with a copy sent to the Safety 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 Office Manager or designee from the Office where the covered employee is assigned. If a First Aid Responder is assigned to the office, the Office Manager or designee will evaluate the circumstances surrounding the exposure incident.

This evaluation will consist of at least: (a) a review of the Exposure Incident Report completed by the Amsys Energy employee; (b)

documentation regarding a plan to reduce the likelihood of a future similar exposure incident; and (c) notification of the Safety Office and discussion of any similar incidents and planned precautions. Such reports will be maintained in the office where employee is assigned, and a copy is to be sent to the Safety Office.

The Safety 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,

The Safety Office will issue an alert should similar incidents or trends among offices be noted so that further incidents can be anticipated and prevented.

## APPENDIX B

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**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 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

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**APPENDIX C**  
**WRITTEN OPINION**

To the Evaluating Physician:

After you have determined whether there are contra indications to vaccination of this Amsys Energy 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

\_\_\_\_\_

\_\_\_\_\_

## **APPENDIX D**

### **INSTRUCTIONS FOR THE EVALUATING PHYSICIAN**

This Amsys Energy 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)

## 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 nonintact skin, percutaneous)?  
\_\_\_\_\_  
\_\_\_\_\_

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 \_\_\_\_\_