



STREETER
ASSOCIATES

SHARP MINDS. SUPERIOR CONSTRUCTION.



BLOODBORNE PATHOGENS PROGRAM

TAB 15



BLOODBORNE PATHOGENS

TABLE OF CONTENTS

POLICY	Page 2
PROGRAM ADMINISTRATION	Page 2
EXPOSURE DETERMINATION	Page 3
WORK ACTIVITIES WITH POTENTIAL EXPOSURE	Page 4
BLOODBORNE PATHOGENS COMPLIANCE PROGRAM	Page 4
HEPATITIS B VACCINATION EMPLOYEE LIST	Page 8
DECLINATION	Page 8
DECLINATION FORM	Page 9
POST-EXPOSURE EVALUATION AND FOLLOW-UP	Page 10
INFORMATION PROVIDED TO HEALTHCARE PROVIDERS	Page 11
THE HEALTHCARE PROFESSIONALS WRITTEN OPINION	Page 11
MEDICAL RECORD KEEPING	Page 12
INCIDENT INVESTIGATION FORM	Page 13
POST-EXPOSURE EVALUATION CHECKLIST	Page 14
INFORMATION AND TRAINING	Page 15
TRAINING TOPICS	Page 15
TRAINING METHODS	Page 16
RECORD KEEPING	Page 16



MODEL EXPOSURE CONTROL PLAN

POLICY

Streeter Associates is committed to providing a safe and healthy work environment for our employees. 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 is a key document to assist our organization in implementing and ensuring compliance with the standard, thereby protecting our employees. This ECP 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

Implementation methods for these elements of the standard are discussed in the subsequent pages of this ECP.

PROGRAM ADMINISTRATION

Streeter's Safety Director is responsible for implementation of the ECP. The safety director will maintain, review, and update the ECP at least annually, and whenever necessary to include new or modified tasks and procedures. You can contact the safety director at the main office by calling 607-734-4151.

Those employees who are determined to have occupational exposure to blood or other potentially infectious materials (OPIM) must comply with the procedures and work practices outlined in this ECP.

The safety director and or jobsite superintendent will provide and maintain all necessary personal protective equipment (PPE), engineering controls, labels, and red bags as required. The safety director or your jobsite superintendent will ensure that adequate supplies of the aforementioned equipment are available in the appropriate sizes.

Streeter's safety director will be responsible for ensuring that all medical actions required by the standard are performed and that appropriate employee health and OSHA records are maintained. These will be maintained at the main office located at:



101 East Woodlawn Ave.
Elmira, NY 14901
607-734-4151

Streeter's safety director will be responsible for training, documentation of training, and making the written ECP available to employees, OSHA, and NIOSH representatives.

This information is also located at:

101 East Woodlawn Ave.
Elmira, NY 14901
607-734-4151

EXPOSURE DETERMINATION

Training is the heart of our First-Aid program. Employees should NOT attempt to rescue or treat an injured or ill employee unless they are qualified to do so. Instead, they should contact someone who is qualified. For all serious injuries 911 must be called immediately.

Employees who are qualified to render first-aid and have completed a certified first aid training program may render first aid, at their discretion.

Training for first-aid is offered by Streeter's safety director, who is a certified trainer from the American Red Cross. First-aid courses are individualized to the needs of our construction jobsites. Additional training may be needed if unique conditions at a specific worksite necessitate the addition of customized elements to a first-aid training program.



WORK ACTIVITIES INVOLVING POTENTIAL EXPOSURE TO BLOODBORNE PATHOGENS

Listed below are the titles and tasks/procedures that may bring these individuals into contact with human blood or other potentially infectious materials, which may result in exposure to bloodborne pathogens:

JOB TITLE	TASK/PROCEDURE
Superintendent	Performing First aid/CPR, Working around raw sewage, working in healthcare facilities
Carpenter	Performing First aid/CPR, Working around raw sewage, working in healthcare facilities
Laborer	Performing First aid/CPR, Working around raw sewage, working in healthcare facilities
Mason	Performing First aid/CPR, Working around raw sewage, working in healthcare facilities

BLOODBORNE PATHOGENS COMPLIANCE PROGRAM

Streeter Associates understands there are a number of areas that must be addressed to effectively eliminate or minimize exposure to bloodborne pathogens in any business, and though not all need to be fully addressed, each will be discuss to ensure that all areas are considered. The first four areas addressed in our plan are:

- Use of “universal precautions”
- Establishment of appropriate engineering controls and work practice controls
- Use of necessary personal protective equipment (PPE)
- Implementation of appropriate housekeeping

Each of these areas is reviewed with employees during their bloodborne pathogens training. By rigorously following the requirements of the Occupational Safety and Health Administration’s (OSHA’s) Bloodborne Pathogens Standard in these four areas, Streeter Associates not only complies with OSHA’s standard but also eliminates or minimizes its employees’ occupational exposure to bloodborne pathogens as much as possible.

A. Universal Precautions

In our business, which includes all off-site work locations, as well as the shop, Streeter Associates has begun the practice of “universal precautions.” As a result, all human blood and bodily fluids are treated as though they are known to be infected with



Hepatitis B Virus (HBV), Human Immunodeficiency Virus (HIV) and other bloodborne pathogens.

In circumstances where it is difficult or impossible to differentiate between body fluid types, it is assumed that all body fluids are potentially infectious. Streeter’s safety director is responsible for overseeing the Universal Precautions Program.

B. Engineering and Work Practice Controls

Engineering controls are controls that isolate or remove bloodborne pathogen hazards from the workplace. Work practice controls reduce the likelihood of exposure by altering the manner in which a task is performed.

In the construction industry, blood or other bodily fluids are not worked with in an occupational manner; any exposure to these potentially hazardous substances by anyone other than the cleaning staff is almost always the result of an accident. Continual efforts are made to create safer working conditions for employees so that accidents will not occur, and all aspects of the safety program constitute work practice controls. Additional controls take the form of PPE, hand washing and other controls that take place immediately during and after an accident on a job site.

Listed below are potential exposure situations and the engineering or work precautions taken to minimize risks. Streeter’s safety director is responsible for the Engineering and Work Practice Controls Program.

Potential Exposures	Precautions

This list is reexamined during an annual exposure control plan review, and opportunities for new or improved controls are identified. Any existing equipment is checked for proper function and needed repair or replacement periodically by the supervisor of the crew or job site.

C. Personal Protective Equipment

PPE is an employee’s first line of defense against bloodborne pathogens. Because of this, Streeter Associates provides (at no cost to employees) the PPE they need to protect themselves against exposures.



PPE at the office and work sites includes:

- Gloves
- Eye protection
- Masks/respirators
- Tyvek suits

Superintendents are responsible for ensuring all work sites have appropriate PPE available to employees.

Employees are trained regarding the need for appropriate PPE for their job responsibilities. Additional training is provided when necessary (for example, if an employee takes a new position or if new job functions are added to his or her current position).

To ensure PPE is not contaminated and is in the appropriate condition to protect employees from potential exposure, Streeter adheres to the following practices:

- All PPE is inspected periodically and repaired or replaced, as needed, to maintain effectiveness.
- Single-use PPE is disposed of immediately after use.

To make sure this equipment is used as effectively as possible, employees adhere to the following practices when using PPE:

- Any garments penetrated by blood or other body fluids are removed as soon as feasible.
- All potentially contaminated PPE is removed prior to leaving the work area.
- Gloves are worn whenever an employee anticipates handling or touching contaminated items or surfaces.
- Disposable gloves are replaced as soon as practical after contamination or when they are torn, punctured or otherwise lose their ability to function as an exposure barrier.

D. Housekeeping

Maintaining its shop, office and work sites in clean and sanitary condition is an important part of Streeter's exposure control plan. Employees are trained to dispose promptly of or clean any surface that comes into contact with bodily fluids, in keeping with the other sections of this program. Also, Handwashing stations and or antiseptic hand cleansers/towelettes are readily available at all jobsites. There is no reason to



anticipate regular exposure to bodily fluids by employees, so there is no routine schedule for decontamination at work sites. However, in the event of an accident resulting in an exposure, the following practices shall take place:

- All equipment and surfaces are cleaned and decontaminated after contact with blood or other potentially infectious material.
- Protective coverings (such as plastic trash bags) are removed and replaced at the end of the work shift if they have been contaminated during the shift.
- All trash containers, pails and bins are cleaned and decontaminated as soon as possible after contaminated.

The safety director/ superintendent are responsible for overseeing the cleaning and decontamination process and making sure it is carried out properly.

Streeter Associates is careful in its facility and on its work sites when handling regulated waste (including used bandages, tissues, and any other potentially infectious materials).

- They are discarded or bagged in containers that are:
 - Closeable
 - Puncture-resistant
 - Leak-proof (if the materials have the potential to leak)
 - Red in color or labeled with the appropriate biohazard warning label
- Containers used for these purposes are placed in appropriate locations within easy access of employees and as close as possible to the sources of the waste.
- Waste containers shall be maintained upright and not allowed to overfill.
- Whenever employees move containers of regulated waste from one area to another, the containers are immediately closed and placed inside a secondary container if leakage is possible from the first container.

The jobsite Superintendent/safety director are responsible for collection and handling of any contaminated waste.



HEPATITIS B VACCINATION EMPLOYEE LIST

For purposes of compliance with the OSHA's General Duty Clause, Streeter Associates has prepared a written exposure control plan and implemented a training program on bloodborne pathogens. The majority of employees are not exposed to bloodborne pathogens, and any exposure would be the result of an on-the-job accident only. For this reason, Hepatitis B vaccinations are not offered except to those employees required by the company to be certified in first aid. If workers are working around raw sewage (at a wastewater treatment facility projects) or have the potential exposure due to the nature of their job, They will be offered the Hepatitis A or the combination (twinrix) vaccine that protects against Hepatitis A and Hepatitis B.

DECLINATION

In the event that any employees who are offered the Hepatitis B vaccination series decide to decline the series, they must read and sign the mandatory Hepatitis B Vaccine Declination Form on the next page.



Hepatitis B Vaccine Declination Form

Hepatitis B Declination Statement

The following statement of declination of hepatitis B vaccination must be signed by an employee who chooses not to accept the vaccine. The statement can only be signed by the employee following appropriate training regarding hepatitis B, hepatitis B vaccination, the efficacy, safety, method of administration, and benefits of vaccination, and that the vaccine and vaccination are provided free of charge to the employee. The statement is not a waiver; employees can request and receive the hepatitis B vaccination at a later date if they remain occupationally at risk for hepatitis 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 me; however, I decline hepatitis B 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: _____



POST-EXPOSURE EVALUATION AND FOLLOW-UP

If employees are involved in an incident where exposure to bloodborne pathogens may have occurred, there are two efforts on which to focus immediately:

1. Investigating the circumstances surrounding the exposure incident
2. Making sure employees receive medical consultation and treatment (if required) as quickly as possible

Streeter's safety director investigates every exposure incident that occurs in the company facilities or on work sites. This investigation is initiated within 24 hours of the incident and involves gathering the following information:

- Date and time when the incident occurred
- Where the incident occurred
- What potentially infectious materials were involved in the incident
- Source of the material
- Under what circumstances the incident occurred
- How the incident was caused
- PPE in use at the time of exposure
- Actions taken as a result of the exposure (decontamination, cleanup, notifications)

After this information is gathered, it is evaluated and a written summary of the incident and its cause is prepared. Recommendations are then made for avoiding similar incidents in the future (see the Incident Investigation Form at the end of this section).

To make sure employees receive the best and most timely treatment when an exposure to bloodborne pathogens occurs, an evaluation and follow-up process has been set up. The checklist at the end of this section will be used to verify that all the steps in the process have been taken correctly. This process is overseen by the safety director.

Much of the information involved in this process must remain confidential, and everything possible will be done to protect the privacy of the people involved.



As the first step in this process, an exposed employee will be provided with the following confidential information:

- Documentation of the routes of exposure and circumstances under which the exposure incident occurred
- Identification of the source individual (unless protected by law)

(As previously stated, most exposure to bodily fluids will be the result of a workplace accident, and this information will be known.)

Next, if possible, the source individual's blood will be tested to determine whether the Hepatitis B Virus (HBV) and the Human Immunodeficiency Virus (HIV) is present. This information will be made available to the exposed employee if it is obtained. At that time, the employee will be made aware of any applicable laws and regulations concerning disclosure of the identity and infectious status of the source individual.

Finally, the blood of the exposed employee is collected and tested for HIV and HBV if needed. Once these procedures have been completed, an appointment is arranged for the exposed employee with a qualified health care professional to discuss the employee's medical status. This includes an evaluation of any reported illnesses, as well as any recommended treatment.

INFORMATION PROVIDED TO HEALTH CARE PROFESSIONALS

To assist health-care professionals, Streeter Associates will forward a number of documents to them, including the following:

- A description of the exposure incident
- The exposed employee's relevant medical records in possession of the employer if release is consented to by the employee
- Any other pertinent information not subject to confidentiality requirements

THE HEALTHCARE PROFESSIONALS WRITTEN OPINION

After the consultation, health-care professionals will provide Streeter Associates with a written opinion evaluating the exposed employee's situation. In turn, a copy of this opinion will be furnished to the exposed employee.

In keeping with this process's emphasis on confidentiality, the written opinion will contain only the following information:



- Whether the Hepatitis B vaccination is indicated for the employee
- Whether the employee has received the Hepatitis B vaccination
- Confirmation that the employee has been informed of the results of the evaluation
- Confirmation that the employee has been told about any medical conditions resulting from the exposure incident that require further evaluation or treatment

All other findings or diagnoses will remain confidential and will not be included in the written report.

MEDICAL RECORD KEEPING

Medical records are maintained for each employee with occupational exposure in accordance with 29 CFR 1910.1020, "Access to Employee Exposure and Medical Records."

Streeter's safety director is responsible for maintenance of the required medical records. These confidential records are kept in the main office for at least the duration of employment plus 30 years.

Employee medical records are provided upon request of the employee or to anyone having written consent of the employee within 15 working days. Such requests should be sent to Streeter's Safety Director at 101 East Woodlawn Ave, Elmira, NY 14901.

To ensure as much medical information as possible is available to the participating health-care professionals, comprehensive medical records will be kept on employees. Streeter's safety director is responsible for setting up and maintaining these records, which include the following information:

- Name of employee
- Social security number of employee
- Copies of the results of the examinations, medical testing and follow-up procedures that took place because of an employee's exposure to bloodborne pathogens
- A copy of the information provided to the consulting health-care professional

As with all personal information, it is important that all medical records be kept confidential. They will not be disclosed or reported to anyone without an employee's written consent (except as required by law).



Exposure Incident Investigation Form

Date of Incident: _____ Time of Incident: _____

Location: _____

Potentially Infectious Materials Involved:

Type: _____

Source: _____

Circumstances (work being performed, etc.): _____

How the incident was caused (accident, equipment malfunction, etc.): _____

Recommendations for Avoiding Repetition: _____

Report Prepared By: _____ Date: _____

Supervisor: _____ Date: _____



Post-exposure Evaluation and Follow-up Checklist

The following steps must be taken and information transmitted in the case of an employee's exposure to bloodborne pathogens:

Employee's Name: _____

ACTIVITY	DATE
Employee furnished with documentation regarding exposure incident	_____
Source individual identified: _____Yes _____No	_____
Source individual's blood collected and tested and results given to exposed employee	_____
_____Consent from source individual could not be obtained. Exposed employee's blood collected and tested	_____
Appointment arranged for employee with health-care professional	_____
Documentation forwarded to healthcare Professional	_____

- Description of exposed employee's duties
- Description of exposure incident, including routes of exposure
- Results of source individual's blood testing
- Employee's medical records



INFORMATION AND TRAINING

Having well-informed and trained employees is critical when attempting to eliminate or minimize employees' exposure to bloodborne pathogens. For this reason, all employees who have the potential for exposure to bloodborne pathogens are put through a comprehensive training program and furnished with as much information as possible on this issue. Employees will be retrained at least annually to keep their knowledge current. Additionally, all new employees, as well as employees changing jobs or job functions, will be given any additional training their new positions require at the time of their new job assignments.

Streeter's safety director is responsible for seeing that all employees who have the possibility of being exposed to bloodborne pathogens receive this training.

TRAINING TOPICS

The topics to be covered in our training program include, but are not limited to, the following:

- OSHA regulations
- The epidemiology and symptoms of bloodborne diseases
- The modes of transmission of bloodborne pathogens
- Streeter's exposure control plan and a copy of the plan
- Appropriate methods for recognizing tasks and other activities that may involve exposure to blood and other potentially infectious material
- A review of the use and limitations of methods that will prevent or reduce exposure, including:
 - Engineering and work practice controls
 - PPE
- Selection and use of PPE, including:
 - Types available
 - Proper use
 - Location
 - Removal
 - Handling
 - Decontamination
 - Disposal



- Actions to take and people to contact in an emergency involving blood or other potentially infectious materials
- The procedures to follow if an exposure occurs, including the incident reporting
- Information about the facility-provided post-exposure evaluation and follow-up, including medical consultation

TRAINING METHODS

Streeter's training presentations make use of several training techniques including, but not limited to, those checked here:

- Classroom-type atmosphere with personal instruction
- Videotape programs
- Training manuals and employee handouts
- Employee review sessions

Because we feel employees need an opportunity to ask questions and interact with their instructors, time is set aside specifically for these activities in each training session.

RECORD KEEPING

To facilitate the training of employees, as well as to document the training process, training records containing the following information are maintained:

- Dates of all training sessions
- Contents/summary of the training sessions
- Names and qualifications of instructors
- Names and job titles of employees attending the training sessions

These training records are available for examination and copying by employees and their representatives, as well as OSHA and its representatives.