

TOWN OF CLAYTON EXPOSURE CONTROL PLAN

The Town of Clayton 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 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

- The Safety Committee is responsible for implementation of the ECP, and will maintain, review, and update the ECP at least annually, and whenever necessary to include new or modified tasks and procedures. Contact location/phone number: Safety Committee, 315-686-3512.
- 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.

- Departmental Exposure Control Coordinators will provide and maintain all necessary personal protective equipment (PPE), engineering controls (e.g., sharps containers), labels, and red bags as required by the standard, and will ensure that adequate supplies of the aforementioned equipment are available in the appropriate sizes. Contact location/phone numbers as follows:

<u>Department Head</u>	<u>Department</u>	<u>Phone Number</u>
Town Supervisor	Administrative	315-686-3512
Highway Superintendent	Highway	315-686-5122
Recreation Supervisor	Buildings & Grounds	315-686-4310

- The Safety Committee 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.
- The Safety Committee will be responsible for training, documentation of training, and making the written ECP available to employees, OSHA, and NIOSH representatives.

EMPLOYEE EXPOSURE DETERMINATION

The following is a list of all job classifications at our establishment in which all employees have occupational exposure and will require mandatory training:

<u>Job Title</u>	<u>Department/Location</u>
Assessor	Town Hall Address: 405 Riverside Dr., Clayton, NY
Clerk	Town Hall Address: 405 Riverside Dr., Clayton, NY
Clerk to Supervisor	Town Hall Address: 405 Riverside Dr., Clayton, NY
Codes/Zoning Officer	Town Hall Address: 405 Riverside Dr., Clayton, NY
Deputy Clerk	Town Hall Address: 405 Riverside Dr., Clayton, NY
Deputy Highway Superintendent	Highway Garage Address: 615 E. Line Road, Clayton, NY
Town Clerk	Town Hall Address: 405 Riverside Dr., Clayton, NY

<u>Job Title</u>	<u>Department/Location</u>
Highway Superintendent	Highway Garage Address: 615 E. Line Road, Clayton, NY
Laborer (FT & PT)	Cerow Recreation Park Address: 600 E. Line Road, Clayton, NY
Laborer (FT & PT)	Transfer Site Address: County Route 4, Clayton, NY
Laborer (PT)	Clayton Harbour Municipal Dock Address: 300 Webb Street, Clayton, NY
Lifeguard	Cerow Recreation Park Pool Address: 600 East Line Road, Clayton, NY
MEO	Highway Garage Address: 615 E. Line Road, Clayton, NY

METHODS OF IMPLEMENTATION AND CONTROL

Universal Precautions

All employees will utilize universal precautions. Universal precautions is an infection control method which requires employees to assume that all human blood and specified human body fluids are infectious for HIV, HBV, HCV and other bloodborne pathogens and must be treated accordingly.

Exposure Control Plan (ECP)

Employees covered by the bloodborne pathogens standard receive 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 Committee or the appropriate Departmental Exposure Control Coordinators. If requested, we will provide an employee with a copy of the ECP free of charge and within 15 days of the request.

The Safety Committee 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. The revisions will be effective upon Town Board approval.

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:

- Hand washing facilities and antiseptic hand cleansers which are readily accessible to all employees who have potential exposure.
- Containers for contaminated sharps have the following characteristics: puncture resistant, color coded or labeled with a biohazard warning label, and leak-proof on the sides and bottoms. Sharps containers are inspected and maintained or replaced by the Buildings & Grounds Department whenever necessary to prevent overfilling.
- Employees wash/cleanse their hands immediately, or as soon as feasible, after removal of potentially contaminated gloves or other personal protective equipment.
- Following any contact of body areas with blood or any other OPIM, employees wash their hands and any other exposed skin with soap and water as soon as possible. They also flush exposed mucous membranes with water.

- Eating, drinking, smoking, applying cosmetics or lip balm and handling contact lenses is prohibited in work areas where there is potential for exposure to bloodborne pathogens.
- Equipment which becomes contaminated is examined prior to servicing or shipping and decontaminated as necessary (unless it can be demonstrated that decontamination is not feasible). An appropriate biohazard warning label is attached to any contaminated equipment, identifying the contaminated portions. Information regarding the remaining contamination is conveyed to all affected employees, the equipment manufacturer and the equipment service representative prior to handling, servicing or shipping.
- When a new employee comes to work for our Town, or an employee changes jobs within the Town, the respective department must notify the Safety Committee of hires/transfers to at-risk locations.
- The following process takes place to ensure that he/she is trained in the appropriate work practice controls: (1) the employee's job classification and the tasks and procedures that will be performed are checked against the job classifications and task lists which are identified in the Exposure Control Plan as those in which occupational exposure occurs; (2) if the employee is transferring from one job to another within the Town, the job classifications and task lists pertaining to his/her previous position are also checked against these lists; (3) based on this "cross-checking", the new job classifications and/or tasks and procedures which will bring the employee into occupational exposure situations are identified; and (4) notification is made to the Department Coordinator, who arranges training for the employee regarding any work practice controls with which the employee is not experienced.
- This facility identifies the need for changes in engineering control and work practices through regular review of the Exposure Control Plan and exposures.
- Evaluate new procedures or new products regularly to determine if they meet OSHA standards and are applicable to our operations.
- Both front line workers (through the use of feedback and surveys) and management officials (on Committees) are involved in this process.
- The Safety Committee will ensure effective implementation of these recommendations.

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 Committee.

The types of PPE available to employees are as follows: gloves, safety glasses, masks, goggles, face shields, and protective jumpsuits/gowns.

PPE is located in the various departments and may be obtained through Department Exposure Control Coordinators. Departmental Exposure Control

Coordinators are responsible for ensuring that all appropriate work areas and vehicles have necessary personnel protective equipment available to employees.

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 may be disposed of in biohazard containers. Such containers are located in the Human Resource Center. Any contaminated PPE shall be placed in a red biohazard bag and transported to the Human Resource Center by the Buildings & Grounds Department.
- Wear appropriate gloves when it is reasonably anticipated that there may be hand contact with blood or 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.
- Remove immediately or as soon as feasible any garment contaminated by blood or OPIM, in such a way as to avoid contact with the outer surface. Contaminated garments shall be placed in red biohazard bags and labeled for pick-up. Contact the Human Resource Office to arrange for pick-up.
- The procedure for handling used PPE is as follows: reusable personal protective equipment is inspected and periodically repaired or replaced as needed to maintain its effectiveness; and used disposable PPE will be disposed of in biohazard containers.

Housekeeping

Maintaining equipment and Town facilities in a clean and sanitary condition is an important component of the Town's Bloodborne Pathogen and Hazard Communications Standards. The Town employs the following practices:

- All equipment and surfaces are cleaned and decontaminated after contact with blood or other potentially infectious materials: (1) immediately (or as soon as feasible) when surfaces are overtly contaminated; (2) after any spill of blood or infectious materials; (3) at the end of the work shift if the surface may have been contaminated during that shift; and (4) disinfecting is done using a 1:10 bleach solution or a disinfectant spray/wipe.
- Protective coverings (linens, plastic trash bags or wrap, or absorbent paper) are removed and replaced as soon as it is feasible when overtly contaminated or at the end of the work shift if they are contaminated during the shift.

- All trash containers, pails, bins and other receptacles intended for use routinely are inspected, cleaned and decontaminated as soon as possible if visibly contaminated.
- Potentially contaminated broken glassware is picked up using mechanical means (such as dustpan and brush, tongs, forceps, etc.).
- Reusable sharps are not used by any Town employees in connection with their work duties at this time.
- Regulated waste (i.e., used bandages, disposed PPE and other potentially infectious materials) is to be placed in containers which are closeable, constructed to contain all contents and prevent leakage, appropriately labeled or color-coded, and closed prior to removal to prevent spillage or protrusion of contents during handling.
- Sharps must be discarded immediately or as soon as possible in containers that are closable, puncture-resistant, leak-proof on sides and bottoms and labeled and color-coded appropriately. Sharps containers are available at the following locations:

Cerow Recreation Park

Bins and pails (e.g., wash or emesis basins) are cleaned and decontaminated as soon as feasible after visible contamination.

Broken glassware that may be contaminated is only picked up using mechanical means, such as a brush and dustpan.

Laundry

Laundering will be performed when an employee's clothing becomes contaminated with blood or potentially contaminated body fluids.

In such instances, the following laundering requirements must be met:

- Contaminated clothing is removed.
- Handle contaminated laundry as little as possible, with minimal agitation.
- Place wet contaminated laundry in leak-proof, labeled or color-coded containers before transport. Use red bags or bags marked with the biohazard symbol for this purpose. Red bags are located in each facility. Once contaminated clothing is placed in a red bag, contact the Human Resource Office for pick-up.
- Wear the following PPE when handling and/or sorting contaminated laundry: (1) rubber gloves, if necessary; and (2) protective eyewear, if necessary.

Labels

The following labeling methods are used in this facility:

<u>Equipment to be Labeled</u>	<u>Label Type (size, color)</u>
Contaminated equipment	red bag or biohazard label
Containers of regulated waste	biohazard label
Sharps disposal containers	biohazard label
Laundry bags w/red bag	contaminated laundry

Departmental Exposure Control Coordinators are responsible for ensuring that warning labels are affixed or red bags are used as required if regulated waste or contaminated equipment is brought into the facility. Employees are to notify Departmental Exposure Control Coordinators if they discover regulated waste containers, refrigerators containing blood or OPIM, contaminated equipment, etc. without proper labels.

HEPATITIS B VACCINATION

The Safety Committee will provide training to employees on Hepatitis B vaccinations, addressing safety, benefits, efficacy, methods of administration, and availability.

The Hepatitis B vaccination series is available at no cost after initial employee training and within 10 days of initial assignment to all employees identified in the exposure determination section of this plan. Vaccination is encouraged unless: (1) documentation exists that the employee has previously received the series; (2) antibody testing reveals that the employee is immune; (3) medical evaluation shows that vaccination is contraindicated.

However, if an employee declines the vaccination, the employee must sign a declination form. Employees who decline may request and obtain the vaccination at a later date at no cost. Documentation of refusal of the vaccination is kept at the Human Resources Office.

Vaccinations will be provided by Jefferson County Public Health. The vaccination program consists of a series of three inoculations over a six month period.

POST-EXPOSURE EVALUATION AND FOLLOW-UP

Should an exposure incident occur, contact the respective Departmental Exposure Control Coordinator as indicated on page 2 and report the incident to the Human Resources Department through the filing of a Town of Clayton Workers' Compensation Injury Report.

An immediately available confidential medical evaluation and follow-up will be conducted by a medical facility within the Town Workers' Compensation medical network. Following initial first aid (clean the wound, flush eyes or other mucous membrane, etc.), the following activities will be performed:

- Document the routes of exposure and how the exposure occurred.
- Identify and document the source individual (unless the employer can establish that identification is infeasible or prohibited by state or local law) and ensure that the confidentiality of such records is maintained.
- Obtain consent and make arrangements to have the source individual tested as soon as possible to determine HIV, HCV, and HBV infectivity; document that the source individual's test results were conveyed to the employee's health care provider.
- If the source individual is already known to be HIV, HCV and/or HBV positive, new testing need not be performed.
- Assure that the exposed employee is provided with the source individual's test results and with information about applicable disclosure laws and regulations concerning the identity and infectious status of the source individual (e.g., laws protecting confidentiality).
- After obtaining consent, collect exposed employee's blood as soon as feasible after exposure incident, and test blood for HBV and HIV serological status.
- If the employee does not give consent for HIV serological testing during collection of blood for baseline testing, preserve the baseline blood sample for at least 90 days; if the exposed employee elects to have the baseline sample tested during this waiting period, perform testing as soon as feasible.

ADMINISTRATION OF POST-EXPOSURE EVALUATION AND FOLLOW-UP

The Safety Committee ensures that health care professional(s) responsible for employee's Hepatitis B vaccination and post-exposure evaluation and follow-up are given a copy of OSHA's bloodborne pathogens standard.

The Safety Committee ensures that the health care professional evaluating an employee after an exposure incident receives the following:

- A description of the employee's job duties relevant to the exposure incident.
- Route(s) of exposure.
- Circumstances of exposure.
- If possible, results of the source individual's blood test.
- Relevant employee medical records, including vaccination status.

The Safety Committee provides the employee with a copy of the evaluating health care professional's written opinion within 15 days after completion of the evaluation.

All of the information set forth above will be maintained in accordance with the Health Insurance Portability and Accountability Act.

PROCEDURES FOR EVALUATING THE CIRCUMSTANCES SURROUNDING AN EXPOSURE INCIDENT

The Safety Committee will review the circumstances of all exposure incidents to determine:

- Engineering controls in use at the time.
- Work practices followed.
- A description of the device being used (including type and brand).
- Protective equipment or clothing that was used at the time of the exposure incident (gloves, eye shields, etc.).
- Location of the incident (O.R., E.R., patient room, etc.).
- Procedure being performed when the incident occurred.
- Employee's training.

Departmental Exposure Control Coordinators will record all percutaneous injuries from contaminated sharps in a Sharps Injury Log. The logs shall be submitted to the Safety Committee.

If revisions to this ECP are necessary, the Safety Committee will ensure that appropriate changes are made, subject to the approval of the Town Board. (Changes may include an evaluation of safer devices, adding employees to the exposure determination list, etc.)

EMPLOYEE TRAINING

All employees who have occupational exposure to bloodborne pathogens receive initial and annual training conducted by or arranged by the Safety Committee.

All employees who have occupational exposure to bloodborne pathogens receive training on the epidemiology, symptoms, and transmission of bloodborne pathogen diseases. In addition, the training program covers, at a minimum, the following elements:

- A copy and explanation of the OSHA bloodborne pathogen standard.
- An explanation of our ECP and how to obtain a copy.
- An explanation of methods to recognize tasks and other activities that may involve exposure to blood and OPIM, including what constitutes an exposure incident.
- An explanation of the use and limitations of engineering controls, work practices, and PPE.

- An explanation of the types, uses, location, removal, handling, decontamination, and disposal of PPE.
- An explanation of the basis for PPE selection.
- Information on the Hepatitis B vaccine, including information on its efficacy, safety, method of administration, the benefits of being vaccinated, and that the vaccine will be offered free of charge.
- Information on the appropriate actions to take and persons to contact in an emergency involving blood or OPIM.
- An explanation of the procedure to follow if an exposure incident occurs, including the method of reporting the incident and the medical follow-up that will be made available.
- Information on the post-exposure evaluation and follow-up that the employer is required to provide for the employee following an exposure incident.
- An explanation of the signs and labels and/or color coding required by the standard and used at this facility.
- An opportunity for interactive questions and answers with the person conducting the training session.

Training materials for Town Facilities are available at the Supervisor's Office (Town Hall) and the following department head offices: Highway Superintendent (Highway Department), Recreation Supervisor (Cerow Recreation Park & Pool, Clayton Harbor Municipal Dock, and Transfer Site).

RECORDKEEPING

Training Records

Training records are completed for each employee upon completion of training. These documents will be kept for at least three years in the Human Resources Office.

The training records include:

- The dates of the training sessions.
- The contents or a summary of the training sessions.
- The names and qualifications of persons conducting the training.
- The names and job titles of all persons attending the training sessions.

Employee training records are provided upon request to the employee or the employee's authorized representative within 15 working days. Such requests should be addressed to the Safety Committee.

Medical Records

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

The Town's Human Resources Office is responsible for maintenance of the required medical records. These confidential records are kept in the Human Resources Office in accordance with the Town's record retention and disposition practices.

Employee medical records are provided upon request of the employee or to anyone having written consent of the employee within 15 working days and/or in accordance with the Collective Bargaining Agreement. Such requests should be sent to the Town of Clayton, Human Resources Office, P.O. Box 279, 405 Riverside Drive, Clayton, New York 13624.

OSHA Recordkeeping

An exposure incident is evaluated to determine if the case meets OSHA's Recordkeeping Requirements (29 CFR 1904). This determination and the recording activities are done by the Safety Committee.

Sharps Injury Log

In addition to the 1904 Recordkeeping Requirements, all percutaneous injuries from contaminated sharps are also recorded in a Sharps Injury Log which shall be maintained by each Departmental Exposure Control Coordinator and a copy sent to the Safety Committee on or before December 31 of each year. All incidences must include at least:

- Date of the injury.
- Type and brand of the device involved (syringe, suture needle).
- Department or work area where the incident occurred.
- Explanation of how the incident occurred.

This log is reviewed as part of the annual program evaluation and maintained for at least five years following the end of the calendar year covered. If a copy is requested by anyone, it must have any personal identifiers removed from the report.

ATTACHMENT 1

HEPATITIS B VACCINE DECLINATION (MANDATORY)

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 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's Signature: _____ Date: _____