# Bloodborne Pathogens

# Exposure Control Plan

# for

# Used Syringe Pick-Up

# and

# Blood Spill Clean Up

# FCSWMD Transfer Stations

***Relevant Standards and Requirements -*** [1910.1030 - Bloodborne Pathogens](https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.1030)

**Municipality:**  \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

**Department Name:** Transfer Station

**Introduction** - The following Exposure Control Plan (ECP) was developed in accordance with the OSHA Standard on Bloodborne Pathogens, 29 CFR 1910.1030. This ECP has been customized for transfer stations by Lynn Rose, EHS/P2 consultant to the Solid Waste District, in conjunction with Jan Ameen, Executive Director of the Solid Waste District. It is based on the integration of two templates provided by the Massachusetts Department of Labor Standards for discarded syringes and for managing blood spills for municipal department employees whose job descriptions do not include providing healthcare or dental services.

**Review and Update Frequency** - Towns and the Solid Waste District should review this ECP annually and whenever there are changes to assigned positions, protocols, and work practices.

**Version** – Revised March 2023

1. **Plan Purpose**

Used syringes and blood spills can be contaminated with blood that may be infectious with Hepatitis B and C, HIV or other bloodborne pathogens. Transfer station attendants who are assigned to clean up discarded syringes and blood spills must be protected from unprotected contact with items and materials contaminated with BBPs.

This Exposure Control Plan (ECP) provides procedures, guidance, and assigned roles and responsibilities for protecting attendants from contracting illness when handling used syringes and materials at the transfer station contaminated with blood and for cleaning up blood spills.

1. **Summary of Responsible Personnel**

**Town Administration –** ensures that transfer station attendants have the training, supplies, and supervision to comply with the requirements of this plan. They are also responsible for offering the attendants the Hepatitis B vaccine, coordinating access to medical care, and maintaining medical and injury records.

**Transfer Station Attendants** - are the designated employees delegated with the responsibility for picking up used syringes that have been either improperly disposed of or have spilled from containers collected at the transfer station, and for cleaning up blood spills.

**Solid Waste District** – has developed the ECP and program, and has provided the required PPE, tools, supplies, and training to operationalize it. The District continues to support program operations by providing sharps containers, collecting full sharps containers and biological waste, coordinating the access to the Hepatitis B vaccines, and providing guidance and training materials.

1. **Responsible Positions**

| **ECP Roles** | **Agency or Town Department** | **Contact Person and Title** | **Phone & Email** |
| --- | --- | --- | --- |
| * Coordinates access to Hep B vaccine. | FCSWMD coordinates access to AEIOU for Hep B Vaccine | Jan Ameen, Executive Director | 413-772-2438  fcswmd@crocker.com |
| * Coordinates medical aspects of ECP - offering of Hep B vaccinations, reporting and follow-up of needlestick and BBP exposures, etc. | Town position who the attendant should report an exposure or needlestick injury to. |  |  |
| Town to offer Hep B vaccine. |  |  |
| Town maintains records of Hep B vaccinations, and reporting and follow-up of needlestick and BBP exposures and treatment. |  |  |
| * Coordinates Training | FCSWMD provided training for first year, and a training module for future use. | Jan Ameen, Executive Director | 413-772-2438  fcswmd@crocker.com |
| Town ensures and funds attendants to receive training, and maintains training records. |  |  |
| * Ensures that employees review the ECP. | Town |  |  |
| * Pick up used syringes and clean up blood spills. See requirements in section 6 below. | Transfer Station Attendants |  |  |
| * Collection and disposal of sharps containers and bags of biohazardous waste. | FCSWMD | Jan Ameen, Executive Director | 413-772-2438  fcswmd@crocker.com |
| * Provide required PPE, tools and supplies to clean-up blood spills and pick up used syringes. | FCSWMD | Jan Ameen, Executive Director | 413-772-2438  fcswmd@crocker.com |

**Work Practices for Managing Used Syringes and Blood Spills** – please see Appendix B and the Attendant’s Handbook, Chapter 9 Appendices for specific protocols for:

* 9A: Used Syringe Pickup
* 9B: BBP Spill Clean Up

Training and work practices provided by the program instructs that:

* All discarded syringes and blood spills should be assumed to be contaminated with blood that could contain Hepatitis, HIV or other bloodborne disease. This is called “Universal Precautions” when all blood-contaminated items are considered infectious.
* All body fluids are potentially infectious and encourages them to follow “Standard Precautions” which treats all body fluids as potentially infectious.

1. **Key Requirements for Selection and Management of PPE, Supplies, and Tools**

* **Handwashing:**
* Handwashing with soap and water is required after handling a used syringe and removing gloves.
* Alcohol hand-sanitizer is provided for use when a sink is not available. This should be followed up with handwashing as soon as a sink is available.
* **Gloves -** The Solid Waste District has provided gloves and guidance for the following protocols:
* Syringe Pick-Up:
  + Specifications - Both knit and leather gloves that comply with the ANSI-rated puncture and cut resistant standard #4. Note: Attendants have been instructed to not use nitrile gloves as they are not puncture resistant.
  + Use - These gloves can be re-used if not contaminated with blood.
* Blood Spill Pick-Up
  + Specifications - Disposable nitrile gloves were selected and provided for their chemical resistance to disinfectant used.
  + Use - Disposable nitrile gloves should:
  + only be used once,
  + be replaced when they are torn, punctured, or when their ability to function as a barrier is compromised, and
  + be disposed of immediately with the other spill waste.
* **Syringe Pick-Up Kit – specifications and contents:**
* Specifications of Sharps Container:
  + They are puncture-proof and leak-proof.
  + They have a cap to allow the container to be carried to different locations without spilling.
  + Are labeled with a Biohazard label.
* Use of Sharps Container - Attendants have been directed to:
  + Replace and dispose of the sharps container when it is 3/4 full.
  + Contact the Solid Waste District for disposal.
  + Never pour the contents of a smaller sharps container into a larger container.
* Selection and Use of Tools for Pick-Up of Used Syringes:
  + Attendants have been provided with long-nose pliers (designated tool) and long-handled picker tool (could be used) to pick up syringe so that hand contact is not required.
  + Work practices direct attendants to bring the sharps container to the pick-up location, place it on the ground, and to dispose of used syringes needle-first into the sharps container without hand contact.
* **BBP Kit**
* Contents:
  + PPE - (1) CPR Mask Pack, (1) CPR Breathing Barrier, (1) Eye and Face Shield Mask, (1) Large Control Gown, (1) Pair of Nitrile Gloves
  + Supplies - (1) Scoop and Spatula, (1) Spill Clean-Up Pack, (2) Absorbent Powder, (1) Antiseptic Towelette, (1) Disinfectant Cloth, (4) Alcohol pads, (2) Sani-Zide surface disinfectant wipes, (10) Paper Towels, (1) Unmarked Bag, (1) Biohazard Bag
* Restocking - Attendants have been directed to monitor and replenish kit supplies by contacting the Solid Waste District.

1. **Assigning and Preparing Employees to Pick-Up Discarded Syringes and Clean-Up Blood Spills:** The Town may assign employees to conduct these tasks when all the following criteria are met:

* The employee is offered the Hepatitis B vaccine.
* The employee is provided with gloves, tools, disinfectant and sharps container.
* The employer has a procedure in place to provide immediate medical care if the employee experiences a needlestick or an exposure to blood contaminated materials.
* The employee is provided with pre-assignment and annual BBP training.

1. **Responsibilities for Providing the Hepatitis B Vaccine**

Who: Attendants assigned to pickup discarded syringes and clean blood spills must be offered the Hepatitis B vaccine by the Town.

When: Within 10 days of assignment to job duties to pickup used syringes.

How: The Hepatitis B vaccine is a 3-part vaccine. The vaccine consists of 3 doses administered at 1week, 1month, and 6month intervals. Attendants assigned to pickup discarded syringes should also receive the antibody titer.

Attendants may work with syringes after getting the first dose.

Payment: The Town must offer the Hepatitis B vaccine at no cost to attendants who are given job duties that involve exposure to BBPs.

Where: Healthcare Provider:

AEIOU Greenfield

489 Bernardston Road, Greenfield, MA 01301

Phone: 413-773-1394

Vaccine Declinations:

* Employees may decline the Hepatitis B vaccine.
* Employees who decline the vaccine must sign a waiver which uses the wording in Appendix A of the OSHA Standard (see attached Appendix A).
* Employees who initially decline the vaccine, but who later want to have it, may then have the vaccine provided at no cost.

Making Arrangements for Attendants to Receive the Vaccine:

* The Solid Waste District has established a system with a local healthcare provider, AEIOU Greenfield, to provide the Hepatitis B vaccination to attendants.
* The Town will communicate with the Solid Waste District when attendants have requested the vaccine and the District will make arrangements for the attendant to schedule the vaccine.

1. **Training Requirements**

* Requirements
  + Training is required for attendants who are reasonably anticipated to have work-related exposure to contaminated syringes.
  + Training must be conducted before assignment to job duties which require handling of discarded syringes, and annually.
* Available Training - Initial training developed by the Solid Waste District is available on the Solid Waste District’s website, https://franklincountywastedistrict.org/OSHA-Training:
  + New Hire - There is a module on BBPs for new hires as part of the eight-hour OSHA Training Program for Transfer Stations.
  + Annual BBP Training - There is a separate annual training module which was developed with the Solid Waste District and available for a fee on a 3rd party website.
* Town responsibilities for attendant’s training:
  + Fund their time to attend or review training.
  + Ensure they access and watch the trainings.
  + Maintain their training records for three years.
* Training content includes:
* Epidemiology and symptoms of Hepatitis B, Hepatitis C and HIV
* Modes of transmission of Hepatitis B, Hepatitis C and HIV
* Safe work practices for picking up discarded syringes and cleaning up blood spills
* Instruction on gloves and glove selection for each tasks
* Demonstration on how to use the sharps disposal container
* Instruction on what to do and where to go if a needlestick or exposure to blood occurs
* Information on the Hepatitis B vaccine

1. **Handling Contaminated Laundry** - Clothing that is contaminated with blood may be laundered.

* Place contaminated laundry into a plastic bag, label as contaminated.
* Put on disposable gloves (nitrile) to put clothing into the machine.
* Put laundry into washing machine by itself with no other laundry, directly out of the plastic bag without sorting.
* Use hot water wash and add ¼ cup bleach using machine instructions.

**Appendix A: Hepatitis B Vaccine Log and Declination Statement**

**TOWN OF (fill in town name)**

**TRANSFER STATION ATTENDANT**

The OSHA standard 29 CFR 1910.1030 requires employers to offer the Hepatitis B vaccine to employees with potential exposure to blood or other potentially infectious body fluids. Persons who have previously received the vaccine are **not required** to repeat the vaccine. Persons who have not previously obtained an antibody titer are **not required** to obtain a titer. Persons for whom the vaccine is medically contraindicated are **not required** to receive the vaccine.

**Name (print):**

**Directions:** Review the sections below and mark your initials on the appropriate line.

**Accept the Vaccine: initial the line**

Doses 1, 2 and 3:

**I believe I had the vaccine or I want to check my antibody level** Titer:

**Decline the Vaccine:**

I have already received the Hepatitis-B vaccine.

Dates, if known:

Dose 1 \_\_\_\_\_\_\_\_\_\_\_\_\_\_Dose 2 \_\_\_\_\_\_\_\_Dose 3 \_\_\_\_\_\_\_\_\_\_

[*When dates are not known, repeating the vaccine is not recommended*.]

**DECLINE:** 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.

Signature: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_Date:\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

**Note for Persons who are Already Vaccinated**: Persons who have previously received the vaccine should not repeat the vaccine. A booster dose is not recommended by the CDC.

**Appendix B: Work Practices**

**Used Syringe Pick-Up and Blood Spill Clean-Up** - Please see the Attendant’s Handbook, Chapter 9 Appendices for specific protocols for:

* 9A: Used Syringe Pickup
* 9B: BBP Spill Clean Up

**Procedure to Respond to a Needlestick Injury:**

NOTE: A “needlestick” means that the needle edge of a syringe punctured or lacerated the attendant’s skin.

* Medical follow-up is required when:
  + there has been a needlestick injury.
* Medical follow-up is not required when:
  + an attendant touched a used syringe without wearing gloves, or without using a tool to pickup the syringe, and
  + a needlestick injury has not occurred.

**Procedure to respond to an exposure to blood or blood contaminated materials or objects at the transfer station includes:**

* Medical follow-up is required when:
  + Splash to or contact with eyes, nose or mouth
  + Splash to or contact with non-intact skin

**Response Protocols for Exposure or a Needlestick Injury - Get medical treatment within the first 24 hours:**

* Report the injury immediately to: \_\_\_\_\_\_(name of injury coordinator in Town)\_\_\_\_\_\_\_, phone \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_.
* If you are punctured or get a laceration by a used syringe, lancet, razor or other medical “sharp,” you must get medical treatment within the same day. Studies have shown that receiving medical treatment for a needlestick within the first 24 hours is able to prevent transmission of HIV and Hepatitis.
* Discard the syringe into the Sharps Container (see the *Syringe Pick Up Procedures*).
* Do not bring the syringe to the doctor. The blood in the syringe will **not** be tested for HIV or Hepatitis.
* Wash the puncture area with soap and water.
  + Note: **Do Not** disinfect your skin with bleach or disinfectant as this can damage the skin and make transmission of Hepatitis or HIV easier.
* Be prepared to tell the healthcare provider about:
  + Location of puncture on your skin
  + How deep the puncture/laceration is
  + Whether or not there was visible blood inside the syringe tube
  + Whether or not there was visible blood on the needle

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**Required Health Evaluation:** Employees may **not** decline going to a healthcare provider for evaluation. (The employee may decline the advice or treatment offered by a healthcare provider, but they must obtain the evaluation.)

**Confidentiality:** The medical exam is confidential. The employer should not receive medical test results or other medical information regarding the employee.

**Medical Providers:** Employees who experience a needlestick should be sent to the following healthcare provider within the first 24 hours.

**Name of Healthcare Provider: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

**Address: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

**Phone:**  **\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**