

Bloodborne Pathogen Program

Exposure Determination

Although there is not a large risk of exposure in the scope of our work, except through a collateral duty such as providing first aid, E Light Electric Services has endeavored to identify potential exposures in our work.

Work Activities Involving Potential Exposure to Bloodborne Pathogens

Job Function	Responsibility
Designated First Aid Provider	May provide first aid to injured employees as a collateral duty.

Bloodborne Pathogens Compliance Program

Electrical understands that there are a number of areas that must be addressed to effectively eliminate or minimize exposure to bloodborne pathogens in any business, and although not all need to be fully addressed, each will be discussed 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 our first aid trained personnel during their bloodborne pathogens training.

Universal Precautions

All employees are required to observe the use of “universal precautions”. Employees are trained to treat 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. The Director of Education and Loss Prevention is responsible for overseeing the Universal Precautions Program.

Engineering and Work Practice Controls

Engineering controls are controls that isolate or remove bloodborne pathogens 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 encountered in an occupational manner; any exposure to these potentially hazardous substances by anyone other than first aid responders is almost always the result of an accident. There is continual work 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 personal protective equipment (PPE), hand washing and other controls that occur immediately during and after an accident on a job site.

This list is re-examined 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 monthly by the supervisor of the crew or job site.

Personal Protective Equipment

Personal protective equipment is employees' line of defense against bloodborne pathogens. Because of this, E Light provides (at no cost to the employees) the PPE they need to protect themselves against exposures.

PPE at the office and work sites include:

- CPR Mask Pack
- Hard Plastic Case with Gasket
- Antiseptic Towelette
- Biohazard Bag
- CPR Breathing Barrier
- Eye and Face Shield Mask
- Large Control Gown
- Pair of Nitrile Exam Gloves
- Spill Clean-Up Pack
- Absorbent Powder
- Antiseptic Towelette
- Biohazard Bag
- Disinfectant Cloth
- Pair of Nitrile Exam Gloves
- Paper Towels
- Scoop and Spatula
- Unmarked Bag

E Light Supervisors are responsible for ensuring that all work sites have appropriate PPE available for 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 current position.

To ensure that PPE is not contaminated and is in the appropriate condition to protect employees from potential exposure, our E Light Electric Services Inc. 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 that this equipment is used as effectively as possible, employees adhere to the following practices when using their PPE:

- Any garments penetrated by blood or other body fluids are removed as soon as feasible.
- All potentially affected 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.

Housekeeping

E Light maintains the work locations in a clean and sanitary condition. As part of Bloodborne Pathogens training, employees are trained to promptly dispose of or clean any surface that comes into contact with bodily fluids, in keeping with the other sections of this program. Because there is no reason to anticipate regular exposure to bodily fluids by employees, there is no routine schedule for decontamination at work sites.

Regulated waste (including used bandages, tissues, and any other potentially infectious materials)

- 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 are 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.

Hepatitis B Vaccine

All first-aid providers who render assistance in any situation involving the presence of blood or other potentially infectious materials shall have the vaccine made available to them as soon as possible but in no event later than 24 hours after the exposure incident. If an exposure incident has taken place, post-exposure follow-up procedures shall be initiated immediately.

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

I understand that because of my occupational exposure to blood or other potentially infectious materials, I may be at risk of acquiring the Hepatitis B Virus (HBV). I have been given the opportunity to be vaccinated with the Hepatitis B vaccine at no charge to me. At this time, however, I decline the Hepatitis B vaccination. I understand that by declining this vaccine, I continue to be at risk for acquiring Hepatitis B, a serious disease. If in the future I want to be vaccinated with the Hepatitis B vaccine, I can receive the vaccination series at no charge to me.

Employee: _____

Date: _____

Supervisor: _____

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 immediately focus:

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

The E Light Safety Department investigates every exposure incident that occurs within the company. This investigation is initiated immediately 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
- personal protective equipment in use at the time of exposure
- actions taken as a result of the exposure (decontamination, clean-up, notifications)

After this information is gathered, it is evaluated, and a written summary of the incident and the causal factors and root cause is prepared. Corrective actions to prevent similar incidents in the future are then implemented.

To make sure employees receive the best and most timely treatment when 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 Director of Education and Loss Prevention.

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 the 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 healthcare 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, E Light Electric Services forwards a number of documents to them, including the following:

- a description of the exposure incident
- the exposed employee's relevant medical records
- any other pertinent information

The Health-Care Professionals' Written Opinion

After the consultation, health-care professionals will provide E Light Electric Services 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

To ensure that as much medical information as possible is available to the participating health-care professionals, comprehensive medical records will be kept on employees.

The Safety Department 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).

Post-Exposure Evaluation and Follow-Up Checklist

Available on iAuditor

Information and Training

Having well-informed and trained employees is extremely important when attempting to eliminate or minimize employees' exposure to bloodborne pathogens. For this reason, all first aid-trained personnel receive bloodborne pathogen training and are 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 position requires at the time of their new job assignment.

The Director of Education and Loss Prevention is responsible for ensuring 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:

- the Occupational Safety and Health Administration's (OSHA's) Bloodborne Pathogens Standard
- the epidemiology and symptoms of bloodborne diseases
- the modes of transmission of bloodborne pathogens
- E Light Electric Services Inc.'s exposure control plan (and where employees can obtain a copy)
- 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
 - personal protective equipment
- selection and use of personal protective equipment, 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 on the facility-provided post-exposure evaluation and follow-up, including medical consultation.

Training Methods

E Light Electric Services Inc.'s training presentations make use of several training techniques including, but not limited to:

- 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 to employees as well as OSHA and its representatives as requested.