

Purpose: The Cumru Township Fire Department is committed to providing a safe and healthful work environment for our entire staff, both career and volunteers. 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.

Administration: The Deputy Chief of Health and Safety is responsible for the implementation of the ECP. The Deputy Chief of Health and Safety will maintain, review, and update the ECP at least annually, and whenever necessary to include new or modified tasks and procedures.

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

The Deputy Chief of Health and Safety 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. The Deputy Chief of Health and Safety will ensure that adequate supplies of the aforementioned equipment are available in the appropriate sizes.

The Deputy Chief of Health and Safety will be responsible for ensuring that all medical actions required by the standard are preformed and that appropriate employee health and OSHA records are maintained.

The Deputy Chief of Training will be responsible for training, documentation of training, and making the written ECP available to employees, OSHA, and NIOSH representatives. Contact information for the Deputy Chief of Training is as follows:

Definitions: The following terminology is used in the sections below:

Employee: A member of the Cumru Township Fire Department, both career and volunteer personnel.

Employee Exposure Determination: The following is a list of all job classifications at our workplace in which all employees have an occupational exposure:

All employees including, but not limited to:

Fire Chief
Assistant Fire Chief
Deputy Fire Chief
Captain
Lieutenant
Firefighter
Support Firefighter
Driver
Junior Firefighter

Methods of Implementation and Control:

Universal Precautions: All employees will utilize universal precautions.

Exposure Control Plan: 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 on-duty fire officer. If requested, we will provide an employee with a copy of the ECP free of charge and within 15 days of the request.

The Deputy Chief of Health and Safety 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.

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:

- Sharps Containers
- Medical Gloves
- Safety Glasses

Sharps disposal containers are inspected and maintained or replaced by the individual station captain or their designee on the first Monday night of each month or whenever necessary to prevent overfilling.

This department identifies the need for changes in engineering controls and work practices through review of OSHA records, employee interviews, and the Cumru Township Safety Committee.

We evaluate new procedures and new products regularly by reviewing literature in trade magazines, from information received by vendor and employees.

All employees and fire officers are involved in this process. If an employee would like to make a recommendation for changes in engineering controls, information should be forwarded to the Deputy Chief of Health and safety for review and further action. The Deputy Chief of Health and Safety is responsible to ensure that any recommendations are implemented after investigating reviewing product literature if found to be an improvement.

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 Deputy Chief of Training or their designee.

The Cumru Township Fire Department provides the following PPE to its employees:

- Medical Gloves
- Safety Glasses
- Surgical Masks

PPE is located in the medical compartment of each fire apparatus. PPE may be replaced by contacting the on-duty fire officer.

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/scene of incident.
- Used PPE may be disposed of in any biohazard red bag, which then is to be disposed when full at Southern Berks Regional EMS, 769 Mountain View Road, Cumru Township.
- 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, splatters, 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.

This procedure for handling used PPE is as follows:

- Reusable PPE shall be placed in yellow contaminated equipment bags for storage and transportation to Southern Berks Regional EMS.

Housekeeping: Regulated waste is placed in containers which are closable, constructed to contain all contents and prevent leakage, appropriately labeled or color coded (see the following section "Labels"), and closed prior to removal to prevent spillage or protrusion of contents during handling.

The procedure for handling sharps disposal containers is to:

- Ensure the container is properly closed
- Transport to the container to Southern Berks Regional EMS and give to Southern Berks Regional EMS personnel for disposal.

The procedure for handling other regulated waste is to:

- Ensure waste is in a sealed container and not able to spill or leak during transportation.
- Transport the waste in an approved container to Southern Berks Regional EMS and give to Southern Berks Regional EMS personnel for disposal.

Contaminated sharps are discarded immediately or as soon as possible in containers that are closable, puncture-resistant, leak proof on sides and bottoms, and appropriately labeled or color-coded. Sharps disposal containers are available at Southern Berks Regional EMS, 769 Mountain View Road, Cumru Township.

Bins and pails (e.g., emesis basins) are single use only and not to be decontaminated.

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

Laundry: The following contaminated articles will be laundered by this company:

- Structural firefighting turnout gear
- Rescue turnout gear
- Clothing (owned by the employee)

Laundering will be performed by the employee at the Cumru Township Fire Department Station 3 located at 769 Mountain View Road, Cumru Township.

The following laundering requirements must be met:

- Handle contaminated laundry as little as possible with minimal agitation
- Place wet contaminated laundry in a leak-proof, labeled yellow biohazard equipment bag and transport it to Station 3.
- When handling and/or sorting contaminated laundry employees should wear at minimum medical gloves
- Laundry shall be decontaminated utilizing commercial soaps as per the manufacturer's directions.

Labels: The following labeling method shall be used by the Cumru Township Fire Department:

- Contaminated waste shall be placed in red non-leak bags with black letters clearly stating the contents of the bag contain contaminated medical waste. Additionally the commonly known biohazard symbol shall be printed on the bag.
- Contaminated items that are to be cleaned (laundered) shall be placed in yellow non-leak bags clearly lettered to identify the contents of the bag contain contaminated equipment or clothing that are to be decontaminated. Additionally the commonly known biohazard symbol shall be printed on the bag.
- Large items that are incapable to be bagged due to their size shall have an orange or red biohazard sticker at least four inches tall by four inches wide affixed on all four sides when possible clearly identifying the item to be contaminated.

The Deputy Chief of Health and Safety is 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 the Deputy Chief of Operations if they discover regulated waste containers, refrigerators containing blood or OPIM, contaminated equipment, etc., without proper labels.

HEPATITIS B VACCINATION: The Deputy Chief of Health and Safety 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 the 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; or 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 the refusal of the vaccination is kept at the Cumru Township Municipal Building, 1775 Welsh Road, Cumru Township, Berks County, Pennsylvania.

Vaccination will be provided by Cumru Township Fire Department at a firehouse designated by the Deputy Chief of Health and Safety or at Reading Hospital Occupational Health.

Following the medical evaluation, a copy of the health care professional's written opinion will be obtained and provided to the employee within 15 days of the completion of the evaluation. It will be limited to whether the employee requires the hepatitis vaccine and whether the vaccine was administered.

POST-EXPOSURE EVALUATION AND FOLLOW-UP: Should an exposure incident occur, contact the on-duty fire officer for the Cumru Township Fire Department. If you are unable to contact the on-duty fire officer directly, contact the Berks County Communications Center at 610-655-4921 and request the Cumru Township Fire Department Officer in Charge telephone you at your current telephone number.

An immediately available confidential medical evaluation and follow-up will be conducted by the Reading Hospital and Medical Center 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).
- 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 Deputy Chief of Health and Safety 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 the OSHA's bloodborne pathogens standard.

The Deputy Chief of Health and Safety 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
- Routes of exposure
- Circumstances of exposure
- If possible, results of the source individual's blood test
- Relevant employee medical records, including vaccination status.

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

PROCEDURES FOR EVALUATING CIRCUMSTANCES SURROUNDING AN EXPOSURE INCIDENT:

The Deputy Chief of Health and Safety 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 (vehicle accident, patient's residence, health care facility, etc.)
- Procedures being performed when the incident occurred
- Employee's training

The Deputy Chief of Health and Safety will record all percutaneous injuries from contaminated sharps in a Sharps Injury Log.

If revisions to the ECP are necessary the Deputy Chief of Health and Safety will ensure that appropriate changes are made. 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 will receive initial training on the epidemiology, symptoms, and transmission of bloodborne pathogen disease. 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, thod 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 the Cumru Township Fire Department

- An opportunity for interactive questions and answers with the person conducting the training session.

Training materials for this facility are available at Southern Berks Regional EMS, 769 Mountain View Road, Cumru Township, Berks County, Pennsylvania.

RECORD KEEPING

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 Cumru Township Fire Department Administrative Offices located at the Cumru Township Municipal Building, 1775 Welsh Road, Cumru Township, Berks County, Pennsylvania.

The training records include:

- The date(s) of training session
- The contents or a summary of the training session(s)
- The name(s) and qualifications of persons conducting the training
- The name(s) 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 made in writing and addressed to the Fire Chief.

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

The Deputy Chief of Health and Safety is responsible for maintenance of the required medical records. These confidential records are kept in the Cumru Township Fire Department Administrative Offices located at the Cumru Township Municipal Building, 1775 Welsh Road, Cumru Township, Berks County, Pennsylvania for at least the duration of employment plus 30 years.

Employee medical records are provided upon written request of the employee or to anyone having written consent of the employee within 15 working days. Such requests should be addressed to the Fire Chief.

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 Deputy Chief of Health and Safety.

SHARPS INJURY LOG: In addition to the 1904 Recordkeeping Requirements, all percutaneous injuries from contaminated sharps are also recorded in a Sharps Injury Log. All incidents must include at least:

- Date of Injury
- Type and brand of the device involved (syringe, IV catheter, ect)
- 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.