COMPLYING WITH OSHA REGULATIONS

The regulations are performance oriented. Specific standards must be met, but the employer is free to meet these standards the best way (s)he can. Briefly, if your operation is the type where exposure to blood or OPIM may be anticipated in the performance of some jobs, you must:

Have a written plan designed to reduce and minimize the possibility of occupational exposure to blood and OPIM.

Train employees how to properly handle blood and OPIM so as to limit their personal risk in doing so.

Maintain open records of training including dates of same, content of session, name and title of leader and the names of those present.

Maintain records of all incidents of exposure to blood or OPIM with records of action taken to prevent reoccurrence. Maintain confidential medical records of those judged to be occupationally subject to exposure. These are to include 1) pre-position physical exams, 2) acceptance or sign-off of HBV vaccination, 3) results of examinations from any incident.

These records must be kept for 30 years from the date the employee was assigned work that had the possibility of exposure to blood or OPIM.

OSHA requires that persons whose jobs place them at risk of probable exposure to blood and OPIM and risk of acquiring Hepatitis B Virus must (within 10 days of assignment of such work) be given the choice to be vaccinated against HBV at no cost to themselves. If the person declines the opportunity, the rejection is to be formalized exactly as written below.

I understand that due to my possible occupational exposure to blood or other infectious materials I could at some time be at risk of exposure to Hepatitis B infection. I have been given the opportunity to be vaccinated with the Hepatitis B vaccine at no charge to myself. However, I decline the Hepatitis B vaccination at this time. I understand that by declining this vaccine, I will 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 to other potentially infectious materials and I want the Hepatitis B vaccine, I can receive the vaccination series at no charge to me.

Name (print)	
Date	
Signature	The second of the second

PREPARING A PLAN

Some parts of an exposure control plan can be general to apply to everyone whose job may put them in contact with blood and OPIM, other parts obviously must be written around an individual and/or an individual's job. One thing common to both is that they must be in writing, dated, and readily available to employees and **OSHA** inspectors. Once written, you should be able to prove that your plan is reviewed at least annually and updated where indicated.

Only you can anticipate which of your jobs may lead to exposure. You should study each job and develop your own plan for compliance with OSHA's very important and very specific regulations, but we list below some of the things that 1) are management's responsibility, 2) could apply generally to everyone in your plan and 3) should be written as responsibilities of a clean-up person in a form that might be of help in preparing your plan.

A. ADMINISTRATIVE RESPONSIBILITIES

- Evaluate all jobs and potential exposure to blood and OPIM.
- Provide Personal Protection Equipment (PPE) such as gloves, masks, gowns, shoe covers, etc.
- Organize and conduct training.
- Name person(s) responsible for your plan and its implementation.
- Maintain records of training, of any incidents and of review of plan.
- Provide easily accessible hand washing stations and/or antiseptic hand cleaner and towelettes.
- Provide the proper clean up equipment and supplies for containing blood and OPIM and disposing of same.
- Provide the proper disinfectant for decontaminating exposed areas.
 (Your usual disinfectant cleaner probably does not meet OSHA and CDC standards. RX44 ACE and RX75 do.)
- Provide proper bags, signs, labels, etc. for regulated waste.
- Be prepared with approved contractors to dispose of regulated waste and to launder soiled clothing.
- Provide Hepatitis B vaccinations without charge to anyone whose job puts them at risk of exposure to blood or OPIM.
- Follow up on lab results and the condition of anyone exposed.

B. GENERAL RESPONSIBILITIES

that might be part of the plan for any covered person.

- All blood and other body fluids shall be considered potentially infectious.
- There is to be no eating, drinking or smoking in areas that are at a high risk of contamination.
- No food or drinks shall be stored with blood or OPIM.
- Protective gloves must be available and should be worn whenever there is risk of exposure. Hands will be treated with Hand Sanitizer or washed with soap and water immediately after removal of gloves.
- Contaminated clothing shall be removed as soon as possible and placed in a contaminated laundry container.
- All exposure accidents should be reported promptly.
- Attendance at training sessions is mandatory.



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It is common knowledge that exposure to infected blood is one of the primary risks of infection by Human **Immunodeficiency Virus** (HIV). In addition to HIV infection and the risk of AIDS, it has been calculated that occupational exposures to blood and other body fluids are responsible for at least 6,000 cases of **Hepatitis B Virus (HBV)** per year. Statistically, this could result in 200 deaths per year.

In the interest of eliminating or minimizing exposure to blood and Other Potentially Infectious Materials (OPIM), OSHA has prescribed Regulation 29 CFR 1910.1030 outlining standard precautions, practices, controls, etc., for operations where exposure may be anticipated in the performance of one's job.





PATHOGEN COMPLIANCE CENTER PROGRAM

ALL SPILLS OF BODY FLUIDS MUST BE CONSIDERED TO BE CONTAMINATED AND HANDLED ACCORDING TO OSHA PROTOCOL.



Are You In Compliance?

According to OSHA Reg. 29 CFR 1910.1030

5,000,000 WORKERS COVERED

Over 500,000 establishments and 5,000,000 workers are estimated to be governed by the regulations. Specifically listed are physicians offices, dental offices, hospitals, medical/dental laboratories, nursing homes, residential care facilities, dialysis centers, drug treatment centers, home health care, hospices, government outpatient facilities, blood collection and processing, industrial health clinics, research labs, linen services, medical and dental equipment repair, law enforcement, fire and rescue, correctional institutions, schools for the handicapped, life saving, funeral homes, handlers of regulated waste, etc. Only persons giving first aid as "good samaritans" are specifically not covered. To avoid the penalties that can be imposed, it seems best to assume that everyone is responsible, or as with so many other government edicts, will be.









RX75 ANTIBACTERIAL HEAVY DUTY CLEANER AND ODOR COUNTERACTANT is a patented quaternary ammonium based formula that kills Tuberculosis and Canine Parvovirus, Norovirus, MRSA, etc.





RX 75 BLOOD SPILL CLEAN UP KIT (BSK) is a three in one tool that places all the needed components for blood spill clean up in one's hands when needed...

RX 44 ACE (For Larger Areas) is one of the most advanced concentrated disinfectant cleaners available. In addition to killing the Gram positive and Gram negative bacteria required for EPA registration, it is proven effective against a wide range of additional hard to kill organisms including MRSA, HBV and HCV.





RX PROTECTION PACK All the accessories needed to safely clean up blood and body fluid spills. Components are also available separately.

RX 200 INSTANT HAND SANITIZER Kills 99.99% of the susceptible organisms on the skin in as little as 15 seconds. Its active ingredient is Benzalkonium Chloride. RX200 is effective against Staphylococcus aureus, Pseudomonas aeruginosa, Enterococcus faecalis and Escherichia coli, all within 15 seconds. OSHA recognizes that protective gloves do not by themselves eliminate hands as a carrier of bloodborne pathogens.





Are You In Compliance?

According to OSHA Reg. 29 CFR 1910.1030

PENALTIES FOR NON-CONFORMANCE

These are serious regulations with penalties of up to \$7,000 for serious violations, even if committed unknowingly. Penalties can increase to \$70,000.00 for willful or repeated infraction.







