Bloodborne Pathogens Plan

Dee Cramer Inc

Completed by: Valerie Bradley Completed Date: 12/28/2012

Exposure Control Plan (ECP) for Bloodborne Pathogens

Purpose

Dee Cramer Inc is committed to providing a safe and healthful work environment for our entire staff. In pursuit of this endeavor, 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 firm 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:
 - o Universal precautions,
 - o Engineering and work practice controls,
 - o Personal protective equipment, and
 - o Housekeeping
- Hepatitis B vaccination;
- Post-exposure evaluation and follow-up;
- Communication of hazards to employees and training;
- Recordkeeping; and
- Procedures for evaluating circumstances surrounding an exposure incident.

The methods of implementation of these elements of the standard are discussed in the subsequent pages of this ECP.

Administrative Duties

Valerie Bradley, Safety Director is responsible for the implementation of the ECP. Valerie Bradley, Safety Director 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: 4221 E. Baldwin Road, Holly MI 48442 810 579 5000 Safety Director.

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.

Safety Director and/or Warehouse Manager will maintain and provide all necessary personal protective equipment (PPE), engineering controls (e.g., sharps containers), labels, and red bags as required by the standard. Safety Director and/or Warehouse Manager will ensure that adequate supplies of the aforementioned equipment are available in the appropriate sizes. Contact location/phone number: 4221 E Baldwin Road, Holly MI 48442 810 579 5000 Safety Director.

Safety Director will be responsible for ensuring that all medical actions required are performed and that appropriate employee health and OSHA records are maintained. Contact location/phone number: 4221 E Baldwin Road., Holly MI 48442 810 579 5000 Safety Director.

Outside source which will be provided by Dee Cramer Inc will be responsible for training, documentation of training, and making the written ECP available to employees, OSHA, and NIOSH representatives. Contact location/phone number: 810 579 5000 Safety Director.

Employee Exposure Determination

The following is a list of job classifications in which some employees at our establishment have occupational exposure. Included is a list of tasks and procedures, or groups of closely related tasks and procedures, in which occupational exposure may occur for these individuals:

Sheet Metal Mechanic Journeyman

Part-time, temporary, contract, and per diem employees are covered by the standard. How the provisions of the standard will be met for these employees is described in this ECP, if applicable.

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 have an opportunity to review this plan at any time during their work shifts by contacting Valerie Bradley, Safety Director. If requested, we will provide an employee with a copy of the ECP free of charge and within 15 days of the request.

Valerie Bradley, Safety Director 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 review and update of such plans must also:

- · Reflect changes in technology that eliminate or reduce exposure to bloodborne pathogens; and
- Document annually consideration and implementation of appropriate commercially available and effective safer medical devices designed to eliminate or minimize occupational exposure. Outside source provided by Dee Cramer Inc documents all devices considered.

The following table lists the safer devices Outside source provided by Dee Cramer Inc has identified as candidates in our last annual review, which took place Verification provided upon request:

| Methods used to | Decision whether or | Justification for |
|--|---------------------|-------------------|
| Device: Methods used to evaluate device: | not to implement: | decision: |

If the company should ever encounter such work determination will be decided at that time solicits input from non-managerial employees responsible for direct patient care in the identification, evaluation, and selection of effective engineering and work practice controls. Only those employees responsible for direct patient care who are potentially exposed to injuries from contaminated sharps need be contacted. Our solicitation method involves the following: Periodic conversations, problem solving groups, safety audits, and inspections.. (enter your answer) documents all solicitation in the ECP.

The following table lists the engineering and work practice controls identified during solicitation in our last annual review, which took place Verification provided upon request:

| Engineering or work | Employee | Description of the second second | say availta |
|---------------------|--------------|----------------------------------|-------------|
| | Trillintavae | Breaum Byarda | |
| | | | |
| | solicited: | inasilan | nonte |
| practice control: | 20TOTOTO | implen | MINO |
| | | | |

Engineering and Work Practice Controls

Engineering 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:

N/A at this time

Sharps disposal containers are inspected and maintained or replaced by Onsite will be provided on request every To Be Determined on jobsite or whenever necessary to prevent overfilling.

This facility identifies the need for changes in engineering control and work practices through: OSHA requirements, employee interviews. We evaluate the need for new procedures or new products by: employee and supervision input, committee involvement.. The following staff are involved in this process: Safety Director, supervisor, lead foreman.

Safety Director and/or Operations Manager will ensure effective implementation of these recommendations.

Personal Protective Equipment (PPE)

PPE is provided to each of our employees at no cost. Training is provided by Outside source which will be provided by Dee Cramer Inc in the use of the appropriate PPE for the tasks or procedures employees will perform.

The types of PPE available to employees are as follows: There will be available hand washing facilities on site and posted for employees knowledge prior to working specific jobsite. If no hand washing facility is available than there will be antiseptic solutions readily available for all employees

PPE is located Warehouse manager will provide upon request from field foreman or project manager and may be obtained through Safety Director and/or Warehouse Manager.

Each employee using PPE must observe the following precautions:

Wash hands immediately or as soom as feasible afte removal of gloves or other PPE. Remove PPE after it becomes contaminated and before leaving the work area. Never reuse PPE after contamination.

The procedure for handling used PPE is as follows: Sanitation & Cleaning Recommendation along with proper ppe if blood or infectious material is found

- Wear the proper ppe; gloves, eye protection, recommended by supervisor
- -Use cleangin products appropriate to your workplace and according to the supplier's recommendation to ensure proper cleaning.
- -Always clean and wash surfaces areas thoroughly before disinfecting them,
- -Use germicides or diluted bleaches (e.g. sodium hypochlorite) to disinfect areas as required.
- -Wash hands thoroughly with warm water and soap, after removing gloves.
- -Report to your supervisor all spills, accidents, incidents etc.

DO NOT: eat, drink, or smoke while using bleaches, cleaning agents, disinfecting agents or the chemcial products.

DO NOT: leave open containers of bleaches, paints and solvents in the washrooms or other areas used by other employees not involved in above tasks...

Housekeeping

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

The procedure for handling sharps disposal containers is: Will be determined on job specific.

The procedure for handling other regulated waste is: To be determined by job specific.

Contaminated sharps are discarded immediately or as soon as possible in containers that are closable, puncture-resistant, leakproof on sides and bottoms, and labeled or color-coded appropriately. Sharps disposal containers are available at To be determined by job specific.

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 picked up using mechanical means, such as a brush and dust pan.

Labels

The following labeling method(s) is used in this facility:

Equipment to be labeled: Label type (size, color, etc.):

To be determined job speicifc will ensure 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 Supervisor, foreman, project manager if they

discover regulated waste containers, refrigerators containing blood or OPIM, contaminated equipment, etc., without proper labels.

Hepatitis B Vaccination

Local Health Clinic will provide training to employees on hepatitis B vaccinations, addressing the safety, benefits, efficacy, methods of administration, and availability.

The hepatitis B vaccination series is available at no cost after training and within 10 days of initial assignment to 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 chooses to decline 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 Main office of Dee Cramer.

Vaccination will be provided by Local Health Care Clinic at nearest available office.

Following hepatitis B vaccinations, the health care professional's Written Opinion 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 Safety Director who will inturn notify health care clinic at the following telephone number Will be posted at job site.

An immediately available confidential medical evaluation and follow-up will be

conducted by According to 29 CFR 1910.1030 - post exposure follow up must be done by or under the supervision of a licensed physician or healthcare professional.. Following the initial first aid (clean the wound, flush eyes or other mucous membranes, etc.), the following activities will be performed:

determined by the local occupational health clinic

Administration of Post-Exposure Evaluation and Follow-up

Safety Director 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.

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

information will be given by the Safety Director along with a description of the emplyee's job duties relevant to the exposure incident

Doctor @ health care facility 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 the Circumstances Surrounding an Exposure Incident

Safety Director, Owners, Contractors etc will review the circumstances of all exposure incidents to determine:

Engineering controls in use at the time, work proactives floowed, description of the device being used,ppe was being worn properly, location of the incident, procedures being performed when the incident occurred, and employee's training.

If it is determined that revisions need to be made, Valerie Bradley, Safety Director will ensure that appropriate changes are made to this ECP. Changes include: evaluations, and exposure detrmination.

Employee Training

Each employee who has occupational exposure to bloodborne pathogens receives training conducted by Outside source which will be provided by Dee Cramer Inc. Our instructor(s) has the following qualifications: professional certified doctors and health professionals.

Each employee who has occupational exposure to bloodborne pathogens receives training on the epidemiology, symptoms, and transmission of bloodborne pathogen diseases. In addition, the training program covers, at a minimum, the following elements:

Through training administrators; copy and explanation of the standard, explanation of our ECP and where a copy can be found, along with methods to recognize, the use and limitations of methods, ppe required

Training materials for this facility are available at jobsites.

Recordkeeping

Training Records

Training records are completed for each employee upon completion of training. These documents will be kept for at least three years at main office of Dee Cramer Inc.

The training records include:

(enter your answer)

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 Outside source which will be provided by Dee Cramer Inc.

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."

Safety Director is responsible for maintenance of the required medical records. These confidential records are kept at 4221 E Baldwin Road., Holly MI 48442 810 579 5000 Safety Director for at least the duration of employment plus 30 years.

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

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 Safety Director.

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.

| Signed: | (employee |
|------------|-----------|
| signature) | |
| Date: | |