

BOWDOIN COLLEGE

BLOOD BORNE PATHOGEN (BBP) EXPOSURE CONTROL PROGRAM

Purpose

This document meets the requirements outlined in OSHA 29 CFR 1910.103 (Blood Borne Pathogen [BBP] Standard) for the development, implementation and maintenance of a written exposure control program. The purpose of the BBP program is to provide information to the employees of Bowdoin College regarding the identification of potential bodily fluid hazards in their workplace, the protective measures to be taken to prevent exposure, and their right of access to occupational health records.

Scope

The BBP program applies to all employees of Bowdoin College (including part-time and student employees) who may be either occupationally or conditionally exposed to bodily fluids in the course of their work.

Program Components

The BBP program consists of the following components:

1. **Determination of Exposure.** Employees of the College will be classified as occupationally exposed, conditionally exposed, or non-classified depending on their potential for BBP exposure in the workplace, as follows:

Classification	Personnel	OSHA Requirements
Occupationally Exposed	Health Services Children's Center Athletic Trainers Lifeguards Security Officers Housekeeping Blood Spill Team Biology Department Faculty/Staff BOC Course Leaders	Initial/Annual Training Hepatitis-B Vaccination
Conditionally Exposed	Dining Services Housekeepers Buildings & Grounds Ice Arena Technicians Shop Technicians	Initial/Annual Training
Non-Classified	<i>All others</i>	RTK information at new employee orientation

2. **Hepatitis-B Vaccinations.** OSHA requires that occupationally exposed employees be offered vaccinations for hepatitis-B within 10 days of employment. The vaccination series consists of three shots over a six-month period, and is provided by the Health Center. If accepted, the employee must sign a release stating caveats associated with the vaccination. The vaccination may also be waived by the employee if: (1) they have

already completed the series; (2) titer testing has indicated existing immunity; or (3) they choose to do so for medical or personal reasons; a waiver form (attached) must then be signed by the employee in lieu of the release.

3. **Universal Precautions and Exposure Control Methods.** Universal precautions include the following:

- Assumption that all fluids are infectious, and avoiding direct contact with bodily fluids or contaminated materials.
- Hazard communication through information, training, signs, and labels.
- Good housekeeping, including thoroughly washing skin, clothing, and surfaces or materials contaminated with bodily fluids with disinfectant, and properly disposing of wastes.
- Use of personal protective equipment (PPE), including gloves, glasses, masks, and protective clothing.

Site-specific exposure controls will be identified by the department or group supervisors, and may include the following:

- Elimination of potential for exposure, by making changes to hazardous tasks or practices.
- Engineering controls, such as sharps containers, medical barriers, and other devices.
- Administrative controls, which include work practices for hazardous tasks and general housekeeping.
- Selection of PPE specific to the workplace or task.

4. **Emergency Response and Incident Investigation.** Occupationally exposed employees and their supervisors will be directed in the proper response and cleanup procedures for a blood spill or similar incident, specifically:

- The incident will be reported to the employee's supervisor, and Security contacted to address any medical or life safety concerns.
- The release area will be secured, and contaminated materials and surfaces isolated for cleanup.
- PPE (i.e., remote respirator, CPR shield) will be used to minimize exposure during delivery of first aid.
- The Housekeeping Blood Spill Team will be contacted for cleanup services, and wastes segregated for proper disposal.
- Individuals who may have been exposed will be directed in proper disinfection procedures, and informed of their right to post-exposure evaluation.
- The supervisor will conduct an accident/incident investigation per Bowdoin College *Supervisor's Safety Program* guidelines.

5. **Post-Exposure Evaluation.** Employees who have been occupationally or conditionally exposed will be offered a post-exposure medical evaluation. A post-exposure evaluation report must be completed by the employee's supervisor, using the standard Bowdoin College *Accident/Incident Report* form.

6. **Biomedical Waste Management.** Contaminated materials from a blood spill or similar cleanup must be managed according to the Bowdoin College *Biomedical Waste Management Plan*, specifically:

- No contaminated materials may be mixed or disposed with regular solid wastes.

- Biomedical wastes must be stored in designated and properly labeled locations (Coe Health Center, Farley Field House, or Druckenmiller Science Center) and containers for off-site disposal by a licensed contractor.
- All waste containers must be appropriate for the materials stored (i.e., red box for sharps, red bag for softs) and labeled "BIOHAZARD" with the standard symbol.

7. **Employee Information and Training.** Occupationally and conditionally exposed employees shall receive initial and annual training specific to their work areas, including at least the following:

- Location and availability of the written BBP exposure control program and associated regulations;
- Epidemiology and symptoms of blood borne diseases, and routes of potential exposure;
- Hazard recognition in the workplace;
- Protective measures to be taken to prevent adverse effects, including the use of personal protective equipment (PPE), engineering controls, and good work practices;
- Availability and administration of hepatitis-B vaccination;
- Emergency procedures, reporting, and post-exposure evaluation;
- Warning signs and labels; and
- The right to access their occupational health records.

Training may be conducted with written, video, or web-based materials, so long as it meets the minimum requirements listed and addresses the specific conditions of the workplace. Supervisors within each department or group are responsible for ensuring that initial and annual training is conducted; contact the EHS Manager for information.

8. **Recordkeeping.** Copies of employee waiver/release forms and training attendance logs will be provided by the supervisors to the EHS Manager and Human Resources, and will be maintained for 3-years. Employee medical records, from vaccinations and post-exposure evaluations, will be kept confidential and maintained for 30-years.

Program Review

The BBP program will be reviewed annually by the EHS Manager and Human Resources Manager, and updated as needed to maintain regulatory compliance and meet the perceived needs of the College's workplaces.

Attachments

Training Summary
Hepatitis-B Vaccine Waiver and Release Forms