



STATE OF CONNECTICUT – COUNTY OF TOLLAND  
INCORPORATED 1786

# TOWN OF ELLINGTON

## Finance Office

55 MAIN STREET – PO BOX 187  
ELLINGTON, CONNECTICUT 06029-0187  
TEL 870-3115 FAX 870-3158

[www.ellington-ct.gov](http://www.ellington-ct.gov)

## EXPOSURE CONTROL PLAN

### POLICY

The Town of Ellington 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 blood-borne pathogens in accordance with Occupational Safety & Health Administration (OSHA) standard 29 CFR 1910.1030, "Occupational Exposure to Blood-borne Pathogens."

The ECP is a key document to assist the Town of Ellington 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 an exposure incident

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

## **PROGRAM ADMINISTRATION**

The Finance Office is responsible for the implementation of the ECP. The Assistant Finance Officer 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: 55 Main Street, Ellington CT 860-870-3115**

Those employees who are determined to have occupational exposure to blood or other potentially infectious materials must comply with the procedures and work practices outlined in this ECP.

The Finance Office 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. Finance Office will ensure that adequate supplies of the aforementioned equipment are available in the appropriate sizes for all departments, excluding Ellington Volunteer Ambulance, Ellington Center Fire Department and Crystal Lake Fire Department which will be responsible for their own PPE.

The Finance Office will be responsible for ensuring that all medical actions required are performed and that appropriate employee health and OSHA records are maintained.

The Human Resource Department will be responsible for training, documentation of training and making the written ECP available to employees, OSHA, and National Institute for Occupational Safety & Health (NIOSH) representatives.

**Contact Location/Phone Number: 55 Main Street, Ellington CT /860-870-3100**

## **EMPLOYEE EXPOSURE DETERMINATION**

The following is a list of all job classifications at our establishment in which all employees have occupational exposure:

<u>JOB TITLE</u>	<u>DEPARTMENT/LOCATION</u>
Police Officer	Police/33 Arbor Way
Emergency Medical Tech	EVAC/41 Maple Street
Animal Control Officer	21 Main Street

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:

<u>JOB TITLE</u>	<u>DEPARTMENT/LOCATION</u>	<u>TASK/PROCEDURE</u>
Custodian	Senior Center/40 Maple Street Library/93 Main Street DPW/21 Main Street Crystal Lake Fire Department/316 Sandy Beach Road	Handling Regulated Waste

Day Camp Counselors            Parks & Recreation Facilities  
Lifeguards  
Site Supervisors  
Coaches

## **METHODS OF IMPLEMENTATION AND CONTROL**

### Universal Precautions

All employees will utilize universal precautions.

### Exposure Control Plan

Employees covered by the blood-borne 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 the Finance Office or by viewing on the Town of Ellington website. If requested, we will provide an employee with a copy of the ECP free of charge and within a reasonable amount of time.

The Finance Office is responsible for reviewing and updating the ECP annually or more frequently if necessary to reflect any new or modified tasks and procedures which 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 blood-borne pathogens. The specific engineering controls and work practice controls used are listed below:

- Appropriate PPE in each building
- Sharps disposal containers accessible to each building

Sharps disposal containers are inspected and maintained by the building's Safety Data Manager or replaced by the Department of Public Works whenever necessary to prevent overfilling.

This facility identifies the need for changes in engineering control and work practices through review of OSHA records, Safety and Health Committee evaluations and employee interviews.

We evaluate new procedures or new products regularly by means of our quarterly Safety and Health Committee meetings.

Both front-line workers and management officials are involved in this process as our Safety and Health Committee is made up of all types of employees in the Town.

The Finance Office will ensure effective implementation of these recommendations.

## Personal Protective Equipment (PPE)

PPE is provided to our employees at no cost to them. Training is provided by Finance Office 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:

- Gloves

PPE is located in each Town Building, in the Employee First Aid Cabinet and may be obtained through the Finance Office.

All employees using PPE must observe the following precautions:

- Wash hands immediately or as soon as feasible after removal of gloves or other PPE.
- Remove PPE after it becomes contaminated and before leaving the work area.
- Used PPE may be disposed of in the Red Bio Hazard Bags; call Stericycle to pick up.
- Wear appropriate gloves when it can be reasonably anticipated that there may be hand contact with blood or other potentially infectious materials, and when handling or touching contaminated items or surfaces; replace gloves if torn, punctured, 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, spatters or droplets of blood or other potentially infectious materials pose a hazard to the eye, nose or mouth.
- Remove immediately or as soon as feasible any garment contaminated by blood or other potentially infectious materials, in such a way as to avoid contact with the outer surface.

The procedure for disposing of **used PPE** is as follows:

Call Stericycle Inc.  
1-866-783-7422

## Housekeeping

**Regulated waste** is placed in containers which are closable, constructed to contain all contents and prevent leakage, appropriately labeled or color-coded (see Labels section on Page 5), and closed prior to removal to prevent spillage or protrusion of contents during handling.

The procedure for disposing of **sharps disposal containers** is:

Call Stericycle Inc.  
1-866-783-7422

The procedure for handling **other regulated waste** is:

Call Stericycle Inc.  
1-866-783-7422

**Contaminated sharps** are discarded immediately or as soon as possible in containers that are closable, puncture-resistant, leak proof on sides and bottoms, and labeled or color coded appropriately. Sharps disposal containers are in each Town building under the employee area sink and are available at Finance Office.

**Bins and pails** (e.g., waste or emesis basins) are cleaned and decontaminated as soon as feasible after visible contamination.

**Broken glassware** which may be contaminated is picked up using mechanical means, such as a brush and dust pan.

### Laundry

Laundering will be performed by:

Swiss Laundry  
860-872-3698

The following laundering requirements must be met:

- Handle contaminated laundry as little as possible, with minimal agitation.
- Place wet contaminated laundry in leak-proof, labeled or color-coded containers before transport. Use red bags marked with biohazard symbol for this purpose.
- Wear the following PPE when handling and/or sorting contaminated laundry:
  - Gloves

### Labels

The Finance Office 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 Finance Office if they discover regulated waste containers, refrigerators containing blood or other potentially infectious materials, contaminated equipment, etc. without proper labels.

## **HEPATITIS B VACCINATION**

The Human Resources Department will provide information 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 (see Page 10). Employees who decline may request and obtain the vaccination at a later date at no cost. Documentation of refusal of the vaccination is kept in employees medical files in the Finance Office.

Vaccination will be provided by CorpCare Occupational Health Center at 2800 Tamarack Avenue, South Windsor, CT 06074; 860-647-4796.

Following the medical evaluation, a copy of the health care professional's written opinion will be obtained and provided to the employee. 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 Finance Office at the following number: 860-870-3115.

An immediately available confidential medical evaluation and follow-up will be conducted by CorpCare Occupational Health Center. Following the 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 not feasible 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).
- 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 Finance Office 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 blood-borne pathogens standard.

The Finance Office ensures that the health care professional evaluating an employee after an exposure incident receives the following:

- Description of the employee's job duties relevant to the exposure incident
- Route(s) of exposure
- Circumstances of exposure
- If possible, results of the source individual's blood test
- Relevant employee medical records, including vaccination status

Upon request the Finance Office provides the employee with a copy of the evaluating health care professional's written opinion within a reasonable amount of time after completion of the evaluation.

## **PROCEDURES FOR EVALUATING THE CIRCUMSTANCES SURROUNDING AN EXPOSURE INCIDENT**

The Finance Office will review the circumstances of all exposure incidents to determine:

- Engineering controls in use at the time
- Work practices followed
- 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
- Procedure being performed when the incident occurred
- Employee's training

The Finance Office will record all percutaneous injuries from contaminated sharps in the Sharps Injury Log.

If it is determined that revisions need to be made, the Finance Office will ensure that appropriate changes are made to this ECP. (*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 blood-borne pathogens receive training conducted by Town of Ellington.

All employees who have occupational exposure to blood-borne pathogens receive training on the epidemiology, symptoms and transmission of blood-borne pathogen diseases. In addition, the training program covers, at a minimum, the following elements:

- Copy and explanation of the standard
- Explanation of our ECP and how to obtain a copy
- Explanation of methods to recognize tasks and other activities that may involve exposure to blood and other potentially infectious materials, including what constitutes an exposure incident
- Explanation of the use and limitations of engineering controls, work practices, and PPE
- Explanation of the types, uses, location, removal, handling, decontamination and disposal of PPE
- Explanation of the basis for PPE selection

- Information on the hepatitis B vaccine, including information on its efficacy, safety, method 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 other potentially infectious materials
- 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
- Explanation of the signs and labels and/or color coding required by the standard and used at this facility
- Opportunity for interactive questions and answers with the person conducting the training session

Training materials for the Town of Ellington employees are available in the Human Resource Department.

## **RECORDKEEPING**

### Training Records

Training records are completed for each employee upon completion of training. These documents will be kept for at least **three years** in each said employee's personnel file.

The training records include:

- Dates of the training sessions
- Contents or a summary of the training sessions
- Names and qualifications of persons conducting the training

Employee training records are provided upon request to the employee or the employee's authorized representative within a reasonable amount of time. Such requests should be addressed to Human Resource Department.

### 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."

The Finance Office is responsible for maintenance of the required medical records. These **confidential** records are kept in the Town Hall 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 a reasonable amount of time. Such requests should be sent to the Finance Office.

## 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 Finance Office.

## Sharps Injury Log

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

- Date of the injury
- Type and brand of the device involved
- Department or work area where the incident occurred
- Explanation of how the incident occurred

This log is reviewed at least annually as part of the annual evaluation of the program and is maintained for at least five years following the end of the calendar year that they cover. If a copy is requested by anyone, it must have any personal identifiers removed from the report.

**TOWN OF ELLINGTON**

**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.

\_\_\_\_\_  
Printed Name

\_\_\_\_\_  
Signature

Dated: \_\_\_\_\_

If under 18 years of age, parental consent is required:

\_\_\_\_\_  
Printed Name (Parent)

\_\_\_\_\_  
Signature (Parent)

Dated: \_\_\_\_\_

# **EXPOSURE CONTROL PLAN**

## **Acknowledgement Form**

I acknowledge that I have received a copy of the Town of Ellington's Exposure Control Plan. I understand that it is my obligation to read the plan and familiarize myself with its contents and to abide and comply with all of the policies and procedures set forth therein. I further understand that the Town has the right to change, delete, add to, suspend, or discontinue any of its policies and procedures at any time without prior notice, and that if the Town so exercises this right and I remain employed thereafter, I will abide by, and comply with, all of the Town's policies and procedures which are then in effect.

\_\_\_\_\_  
Printed Name:

\_\_\_\_\_  
Signature:

Dated: \_\_\_\_\_

If under 18 years of age, parental acknowledgement is required:

\_\_\_\_\_  
Printed Name (Parent)

\_\_\_\_\_  
Signature (Parent)

Dated: \_\_\_\_\_

Please return completed form to First Selectman's Office.