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THE BLOODBORNE PATHOGENS STANDARD - A SIMPLIFIED SUMMARY FOR CLEANERS AND RESTORERS

Much has been written and said in our industry since the 1992 inception of the Bloodborne Pathogens Standard. Some have preached the imminent doom of cleaners and restorers if they don't closely follow the rules. Others have almost dismissed it as not relevant to our industry. As is usually the case with extremes, the truth lies somewhere in the middle. The United States Department of Labor Occupational Safety and Health Administration (OSHA) enacted what was officially known as the "Occupational Exposure To Bloodborne Pathogens: Standard 29CFR 1910.1030" on March 6, 1992. The purpose of the standard is to prevent the transmission of bloodborne pathogens such as the HIV virus (the virus that causes Acquired Immune Deficiency Syndrome - A.I.D.S.), Hepatitis B, and other bloodborne diseases, to employees who have occupational exposure to blood and other potentially infectious materials (OPIM). Now that the dust has settled, so to speak, regarding the controversial exchanges surrounding this Standard, we're concerned that most cleaners and restorers are probably more confused than anything else. The purpose of this bulletin is to try to communicate in a simpler format what cleaners and restorers should specifically do. One little warning though, as is the case with almost any government regulation, reading this bulletin and trying to apply what is in it does not reduce your responsibility to make sure that your company is in complete compliance.

Compliance with the Bloodborne Pathogens Standard is required by law if you or any of your employees MAY work in an environment where they could be exposed to blood or any other potential pathogen. Obviously, this standard applies to a restoration company that is providing the clean-up and deodorization of a death scene or blood contamination. The picture gets much foggier when applied to cleaners and restorers in their normal course of activities. Our interpretation is simple: all cleaners CAN potentially come in contact with blood during their normal course of cleaning. Therefore, being familiar with, and implementing the basic programs established within the standard is a good idea. What we will attempt to do here is highlight the standard and give you some basic policies to implement. None of these can replace you contacting your state OSHA office, and getting a copy of the actual standard and reading it.

STANDARD SUMMARY

Universal Precaution: Assume all body fluids are infectious and treat them appropriately. It does not matter whether they are dried or not, assume they are infectious. This would include blood, urine, and other body fluids. For one thing, it is much easier to get employees to take proper precautions when they have a proper respect.

Exposure Control Plan: All employers covered by this standard must have a WRITTEN Exposure Control Plan. This document identifies the individuals who will receive training, the protective equipment they will use, the vaccinations those employees must have, and other health benefits to employees who follow the proper procedures. This plan must be available for review by employees and OSHA inspectors. It should also describe methods of compliance including work practice controls, housekeeping methods, vaccination provisions, record keeping, and training.

Record Keeping, Information, and Training: The Standard requires that all employees with occupational exposure must be given an initial and annual training session. Records must be kept on each employee who is covered by the rules. Records should indicate when training sessions were provided, what topics were covered, and who provided the training. Training should include the following: explanations of the standard and bloodborne diseases, the exposure control plan (including how employees can obtain a copy), personal protective equipment (how, when and where to use it), how to recognize tasks which might involve exposure, how to avoid exposure, The Hepatitis B Vaccine, biohazard labels, and handling exposure incidents, emergencies, and disposal.. Each company should examine its own situation to see if policies are in place to reduce exposure.

Work Practice Controls: These are the steps that are being taken to eliminate or reduce exposure hazards. If a piece of protective equipment can be put in place to accomplish this task, then it should be used. Ideal practices are those that eliminate all risk. Included in this would be standard hygiene procedures (e.g.; washing of hands) as well as decontamination of cleaning equipment used in cleaning.

Personal Protective Equipment: Gloves, masks, safety respirators, gowns, rubber boots, goggles, and protective clothing (to prevent the contact of infectious materials to skin, eyes, nose, mouth, clothing or inhalation) should be made available to all employees. Training must be given on how to properly use each of these. Protective equipment must be made available at no charge, should be cleaned and maintained on a constant basis and should be replaced when needed. It is up to the employer to determine what type of equipment may be required.

Housekeeping: Facilities and equipment must be maintained, cleaned, and kept in a sanitary condition. There must be a written schedule for cleaning and decontamination of the facility. Knowledge on the use of disinfectants is very important.

Vaccinations: Hepatitis B may live up to three weeks, even in dried blood. The standard requires that the three part vaccination must be offered free of charge to all potentially exposed employees. The employee may refuse the vaccine, but should be required to sign a refusal form.

Labels and Signs: Labels must be provided on containers that contain any potentially contaminated materials. Employees must be trained to recognize these signs and warning labels. Proper disposal of infectious waste must be followed.

The entire standard has now been implemented and your company should have it in place.

PRACTICAL APPLICATION PRINCIPLES

Now that we have reviewed a summary of the standard, lets look at some practical application principles for cleaners and restorers.

1. Maintain a written training program.
2. Hold semi-annual training meetings on preventing or eliminating exposure.
3. When contamination is present or suspected, the area should be sprayed with an E.P.A. Registered Disinfectant such as Steam Way M.S.D. to protect the technician before, during, and after the job.
4. Employees who are working in a contaminated or suspect environment should be equipped with splash goggles, safety respirator, rubber gloves, and a protective suit of clothing. No employee who has open cuts or sores should be allowed to work on the job site.
5. Keep your equipment clean. Spray a disinfectant onto any equipment that was used at the job site or in collections (this includes your waste tanks)
6. Dispose of all bio-hazardous waste only through an authorized receptacle or agency.

For more information, contact your local State OSHA Office or The Technical Services Staff at Steam Way International in Denver.