



FLORIDA POLYTECHNIC  
UNIVERSITY

FACILITIES & SAFETY SERVICES

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# **Exposure Control Plan**

**for**

## **Florida Polytechnic University**

Date of Preparation - April 2016

Reviewed – March 2023

# **FLORIDA POLYTECHNIC UNIVERSITY**

## **EXPOSURE CONTROL PLAN**

### **PURPOSE**

This Exposure Control Plan is designed to provide Florida Polytechnic University students, faculty and staff with the knowledge to prevent exposure to bloodborne pathogens (BBP) and laboratory acquired diseases.

### **POLICY**

Florida Polytechnic University is committed to providing a safe and healthful work environment for students, faculty and staff. The following exposure control plan (ECP) is provided to eliminate or minimize occupational exposure to bloodborne pathogens by following the OSHA standard 29 CFR 1910.1030.

The ECP is a key document to assist our facility in implementing and ensuring compliance with the standard, thereby protecting our students, faculty and staff.

The ECP consists of:

- determination of student, faculty or student exposure
- implementation of various methods of exposure control, such as:
  - universal precautions
  - engineering and work practice controls
  - personal protective equipment (PPE) 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

### **PROGRAM ADMINISTRATION**

Facilities and Safety Services (F&SS) is responsible for the implementation of the ECP and can be reached by phone at (863) 874-8691 or via email at [ehsrequests@floridapoly.edu](mailto:ehsrequests@floridapoly.edu). F&SS will maintain, review, and update the ECP at least annually, and whenever necessary to include new or modified tasks and procedures. Students, faculty or staff who have occupational exposure to blood or other potentially infectious materials (OPIM) must comply with the procedures and work practices outlined in this ECP. In addition, F&SS is responsible for:

- Providing and maintaining all necessary personal protective equipment (PPE), engineering controls (e.g., sharps containers), labels and red bags as required by the standard. F&SS will ensure that adequate supplies of the preceding equipment are available in the appropriate sizes.
- Ensuring that all medical actions required are performed and that appropriate employee

health and OSHA records are maintained.

- Training, documentation of training, and making the written ECP available to students, faculty and staff, OSHA and NIOSH representatives.

## **EMPLOYEE EXPOSURE DETERMINATION**

### Emergency Contact Protocol

#### **Life Threatening Injuries:**

- Call for emergency assistance: **911**
- Call University Police: **(863) 874-8472**
- Call **AmeriSys at (800) 455-2076** to report injuries
- Fill out supervisor's injury report located on Facilities & Safety Services website/forms
- Main Campus Location Number: **0272**
- FIPR Location Number: **0273**

#### **Non-Life Threatening Injuries:**

- Advise Principal Investigator or Laboratory Manager
- Fill out supervisor's injury report located on Facilities & Safety Services website/forms
- Call **AmeriSys at (800) 455-2076** to report injuries
- Main Campus Location Number: **0272**
- FIPR Location Number: **0273**



**Safety Services Contact List**

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<b>First Name</b>	<b>Last Name</b>	<b>Contact Number</b>	<b>Contact E-mail</b>
John	Trecastelli	(863) 874-8722	<a href="mailto:jtrecastelli@floridapoly.edu">jtrecastelli@floridapoly.edu</a>
Danial	Bartle	(863) 874-8666	<a href="mailto:dbartle@floridapoly.edu">dbartle@floridapoly.edu</a>
Renee	Allen	(863) 874-8692	<a href="mailto:rallen@floridapoly.edu">rallen@floridapoly.edu</a>
Samuel	de Olivera	(863) 874-8850	<a href="mailto:sdeolivera@floridapoly.edu">sdeolivera@floridapoly.edu</a>
Scott	Reinhart	(863) 874-8861	<a href="mailto:sreinhart@floridapoly.edu">sreinhart@floridapoly.edu</a>
Elizabeth	Shea	(863) 874-8829	<a href="mailto:eshea@floridapoly.edu">eshea@floridapoly.edu</a>

**Website:** <https://floridapoly.edu/about/environmental-health-safety/>

**Safety Services Requests:** [safetyservices@floridapoly.edu](mailto:safetyservices@floridapoly.edu)

Download forms from F&SS Website: <https://floridapoly.edu/about/facility-safety-services/>

**METHODS OF IMPLEMENTATION AND CONTROL**

Universal Precautions

All students, faculty and staff will utilize universal precautions.

Exposure Control Plan (ECP)

Students, faculty or staff 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 students, faculty and staff have an opportunity to review this plan at any time during their work shifts by contacting F&SS. If requested, a copy will be provided free of charge, within 15 days of the initial request.

F&SS 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 bloodborne pathogens. The specific engineering controls and work practice controls used are listed below:

- Biosafety cabinets and fume hoods are inspected and certified annually.
- Sharps disposal containers are inspected and maintained or replaced by F&SS whenever necessary to prevent overfilling.

This facility identifies the need for changes in engineering control and work practices through review of records; students, faculty, and staff interviews; and committee activities. New procedures are evaluated regularly when regulations are updated and/or when new experiments involve exposure to bloodborne pathogens. Students, faculty and staff are involved in the ECP review process. Comments and feedback are addressed and added as necessary. The Safety Committee reviews the plan for approval and F&SS ensures effective implementation of the recommendations.

## Personal Protective Equipment (PPE)

PPE is provided to students, faculty and staff at no cost to them. Training is provided by F&SS in the use of the appropriate PPE for the tasks or procedures employees will perform. Some examples of PPE available to employees are gloves, lab coats and safety glasses.

All employees using PPE must observe the following precautions:

- Wash hands immediately or as soon as possible after removal of gloves or other PPE.
- Remove PPE (1) after it becomes contaminated and/or (2) before leaving the work area.
- Dispose of used lab coats in a blue cloth bag and gloves in a red bag.
- Wear appropriate gloves when it can be reasonably anticipated that there may be hand contact with blood or OPIM, 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.
- Decontaminate utility gloves 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 OPIM pose a hazard to the eye, nose or mouth.
- Remove any garment contaminated by blood or OPIM immediately or as soon as possible. Avoid any contact with the outer surface.

## Regulated Waste

Regulated waste is placed in containers which are: closable, constructed to contain all contents and prevent leakage and appropriately labeled or color-coded (see Labels). Containers must be closed prior to removal to prevent spillage or protrusion of contents during handling. If there is no leakage

from the container and it is properly labeled, it can be removed. All students, faculty or staff must wear gloves.

### Contaminated Sharps

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 available at the Hazardous Waste room. Seal the container and properly label contents. Use Secure Waste or Triumvirate companies to schedule a pick-up.

### Broken Glassware

Broken glassware that may be contaminated is picked up using mechanical means, such as a brush and dustpan.

### Laundry

Lab coats will be laundered by the supplier **UniFirst**. 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 or bags marked with biohazard symbol for this purpose.
- Wear the following PPE when handling and/or sorting contaminated laundry: gloves, lab coat and goggles.

### Labeling

Labels will be affixed or red bags used as required if regulated waste or contaminated equipment is brought into the facility. Employees should notify F&SS if they discover regulated waste containers, refrigerators containing blood or OPIM, contaminated equipment, etc. without proper labels.

The following labeling methods are used in this facility:

- Specimens are collected in red bags.
- Contaminated laundry will display a biohazard label.



FLORIDA POLYTECHNIC UNIVERSITY  
4700 Research Way, Rm 1027  
Lakeland, FL 33805-8531  
Elizabeth Shea (863)-874-8829

Date: \_\_\_\_\_

### Hepatitis B Vaccination

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:

- documentation exists that the employee has previously received the series,
- antibody testing reveals that the employee is immune, or
- medical evaluation shows that vaccination is contraindicated.

If an employee chooses to decline vaccination, the employee must sign a declination form. Students, faculty or staff who decline may request and obtain the vaccination at a later date at no cost. Documentation of refusal of the vaccination is kept by F&SS.

Vaccination will be provided by the supplier **Medi-Test**. Following the medical evaluation, a copy of the health care professional's written opinion will be obtained and provided to the employee. The information will be limited to whether the employee requires the hepatitis vaccine and if the vaccine was administered.

**Medi-Test contact information:**  
**Phone: (863) 533-7484 ext. 240**  
**Fax: (863) 533-0333**

#### **POST-EXPOSURE EVALUATION AND FOLLOW-UP**

If an exposure incident occurs, contact AmeriSys at (800) 455-2079. The following information is required: FPU Location Number 0272 or FIPR Location Number 0273. In addition, please notify the F&SS Office at [safetyservices@floridapoly.edu](mailto:safetyservices@floridapoly.edu).

A confidential, medical evaluation and follow-up performed by AmeriSys will be immediately available. Following the initial first aid treatment (clean 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 infeasible 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).
- After obtaining consent, collect exposed employee's blood as soon as feasible after exposure incident, and test blood for HBV and HIV serological status.

If the student, faculty or staff member 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

person elects to have the baseline sample tested during this waiting period, testing will be performed as soon as possible.

#### **ADMINISTRATION OF POST-EXPOSURE EVALUATION AND FOLLOW-UP**

F&SS ensures that health care professional(s) responsible for hepatitis B vaccination and post-exposure evaluation and follow-up is given a copy of OSHA's bloodborne pathogens standard.

F&SS ensures that the health care professional(s) evaluating a student, faculty or staff member after an exposure incident receives the following:

- description of student, faculty or staff member's job duties relevant to the exposure incident
- route(s) of exposure
- circumstances of exposure
- results of the source individual's blood test (if possible)
- relevant employee medical records, including vaccination status

F&SS provides a copy of the evaluating health care professional's written opinion to the student, faculty or staff member within 15 days after completion of the evaluation.

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

F&SS 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 used at the time of exposure incident (gloves, eye shields, etc.)
- location of the incident (classroom, laboratory, etc.)
- procedure being performed when the incident occurred
- individual's training

F&SS will record all percutaneous injuries from contaminated sharps in the Sharps Injury Log.

If it is determined that revisions need to be made, F&SS 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.)*

Employees should notify F&SS if they discover regulated waste containers, refrigerators containing blood or OPIM, contaminated equipment, etc. without proper labels.

#### **EMPLOYEE TRAINING**

All employees who have occupational exposure to bloodborne pathogens will receive training conducted by F&SS.



All students, faculty and staff who have occupational exposure to bloodborne pathogens receive training on the epidemiology, symptoms and transmission of bloodborne pathogen diseases. Training materials for this facility are available at F&SS.

In addition, the training program covers, at a minimum, the following:

- a copy and explanation of the standard
- an explanation of the ECP and how to obtain a copy
- an explanation of methods to recognize tasks and other activities that may involve exposure to blood and OPIM, including what constitutes an exposure incident
- an explanation of the use and limitations of engineering controls, work practices and PPE
- an explanation of the types, uses, location, removal, handling, decontamination and disposal of PPE
- an explanation of the basis for PPE selection
- information on the hepatitis B vaccine including: efficacy, safety, method of administration, the benefits of being vaccinated and provision 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 OPIM
- an 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 to the employee following an exposure incident
- an explanation of the signs and labels and/or color coding required by the standard and used at this facility
- an opportunity for interactive questions and answers with the person conducting the training session

## **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 F&SS. 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
- names and job titles of all persons attending the training sessions

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 F&SS.

### 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". F&SS is responsible for maintenance of the required medical records. These **confidential** records are kept for the duration of student, faculty or staff member's employment plus 30 years.

Students, faculty and staff member's medical records are provided upon request to anyone having written consent within 15 working days. Such requests should be sent to F&SS.

#### 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 F&SS.

#### 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 yearly as part of the annual evaluation of the program and is maintained for at least five years following the end of the calendar year of coverage. If a copy is requested by anyone, it must have any personal identifiers redacted from the report.

## How to Report an Accident/Injury

Call AmeriSys at (800) 455-2079 to report the workers' compensation claim. A representative will ask for the information below.

**EMPLOYEE ID:** Record the employee's seven digit employee ID number at the top of the page.

**NAME:** Print the employee's first name and last name, as it is known by Florida Polytechnic University (FPU).

**HOME ADDRESS:** Print the employee's home address that is on file with FPU, and please include city, state and zip code.

**TELEPHONE:** Print the employee's telephone number that is on file with FPU, including area code.

**OCCUPATION:** List the employee's occupation as it is stated by FPU.

**DATE OF BIRTH:** List the employee's date of birth.

**SEX:** Select the corresponding box, male or female.

**SOCIAL SECURITY NUMBER:** Print employee's social security number that is on file with FPU.

**DATE OF ACCIDENT:** Indicate the date the accident occurred.

**TIME OF ACCIDENT:** Indicate the time the accident occurred, and remember to check either "AM" or "PM."

**EMPLOYEE'S DESCRIPTION OF ACCIDENT:** Being as descriptive as you can, indicate how the accident occurred. Be sure to identify what the cause of the accident was. Include the employee's direct supervisor or contact person's name and campus phone number.

**INJURY/ILLNESS THAT OCCURRED:** Print a brief description of the injury. (Ex. Bruise, strain, cut, scrape, contusion, etc.)

**PART OF BODY AFFECTED:** Indicate the part of the body affected by the injury. Be sure to specify "left" or "right" when appropriate, and be specific as to the area injured (Ex. "left wrist," "right knee", "lower right back").

**DATE FIRST REPORTED:** Write the date on which the injury was reported to the employee's supervisor.

If the form being used is the current one on the website, the next sections (\*\*\*) will be automatically completed.

**\*\*COMPANY INFORMATION:**

Employer's Location Name: Florida Polytechnic University

Address: 4700 Research Way

Lakeland FL, 33805-8531

Telephone: (863) 583-9050

**Main Campus location #: 0272**

**Florida Industrial and Phosphate Research Institute location #: 0273**

**TIME IS OF THE ESSENCE**

**IMMEDIATELY CALL AMERISYS AT (800) 455-2079**

If you need additional assistance, contact Human Resources at (863) 874-8421 or [ddoll@floridapoly.edu](mailto:ddoll@floridapoly.edu). Please report the accident to the F&SS Office at (863) 874-8426.

### **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. I have elected to 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: \_\_\_\_\_ (Student, Faculty, or Staff)

Date: \_\_\_\_\_

