



Bloodborne Pathogens Program

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Bloodborne pathogens are infectious materials in blood that can cause disease in humans, including hepatitis B and C, and human immunodeficiency virus or HIV. Workers exposed to these pathogens risk serious illness or death. Bloodborne pathogens are transmitted when contaminated blood or body fluids enter the body of another person. In the workplace setting, transmission is most likely to occur through:

- An accidental puncture by a sharp object, such as a needle, broken glass or other “sharps” that are contaminated with the pathogen.
- Contact between broken or damaged skin, mucous membranes, eyes and mouth and infected body fluids.

Unbroken skin forms an impervious barrier against bloodborne pathogens. However, infected blood or body fluids can enter your system percutaneously through open sores, cuts, abrasions, acne or any sort of damaged or broken skin—even sunburn or blisters.

Purpose

To help reduce occupational exposure to bloodborne pathogens at Mount Snow for positions and/or activities that place employees at risk.

Program Scope

All employees in positions or who perform at-risk activities and have a reasonable risk of coming into contact with blood and other potentially infectious materials (OPIM) will be part of this program. The program scope will include establishing an Exposure Control Plan (ECP) and annual review with the following key elements:

- Exposure determination
- Exposure control methods
- Hepatitis B vaccination
- Post-exposure evaluation and follow-up
- Training and labeling.
- Recordkeeping
- Sharps injury log

Exposure Determination

In developing an exposure control plan, Mount Snow has evaluated job classifications and certain work tasks to determine who and when an employee could be reasonably anticipated to be exposed to a bloodborne pathogen.

Job tasks/procedures that potentially expose an employee to a bloodborne pathogen or potentially infectious material include, but are not limited to:

- Cleaning bathrooms
- Cleaning up vomit
- Helping children with nosebleeds
- Changing diapers
- Performing beautification services
- Responding to emergency medical situations

Mount Snow uses the following categorical distinctions to determine the level of potential exposure:

Category I: Job classifications in which all employees in those job classifications have occupational exposure. The normal job tasks performed by Category I employees involve exposure to blood, body fluids, or tissues. Category I tasks are those normally associated with frequent and repetitive handling and working directly with blood or other potentially infectious material. Category I job classifications, by design, contain an almost constant exposure to the potential for infection. Those employees identified as Category I employees are offered vaccinations free of charge prior to exposure for Hepatitis B virus. If the employee declines the vaccination, he or she is required to signify this in writing using Appendix B.

Category I employees: Rescue, Housekeeping, Custodial, Childcare, Lodging Maintenance and Plumbing.

Category II: Job classifications in which some employees have occupational exposure. The normal job tasks involve no exposure to blood or other potentially infectious materials; however a certain job task as a condition of employment may require performing an unplanned Category I job task.

Category II employees: Health Spa, Perfect Turn employees who work with children, and Security.

Methods of Compliance

There are four accepted methods to reduce the risk of exposure to bloodborne pathogens:

- Universal Precautions
- Engineering and Work Practice Controls
- Personal Protective Equipment
- Housekeeping

Universal Precautions – All bodily fluids and tissues must be assumed to be contaminated with a bloodborne pathogen. The saying “If it’s warm, wet, and not yours...don’t touch it” applies here.

Engineering and Work Practice Controls – Engineering and work practice controls are the next line of defense in reducing the likelihood of exposure to a bloodborne pathogen. Engineering controls eliminate the exposure, while work practice controls are methods employed to reduce exposure or contraction.

All engineering controls (i.e., sharps disposal containers, self sheathing needles) should be maintained and inspected or replaced regularly to ensure their effectiveness.

Work practice controls involve the following:

- Employees shall use the hand washing facilities immediately or as soon as feasible after removal of gloves or other personal protective equipment.
- When hand-washing facilities are not feasible, an antiseptic hand cleanser with clean cloth/paper towels or antiseptic towelettes shall be used. When antiseptic hand cleanser or towelettes are used, hands shall be washed with soap and running water as soon as feasible.
- Eating, drinking, smoking, applying lip balm, and handling contact lenses should not be permitted in work areas where there is reasonable likelihood of exposure.
- Food and drink shall not be kept in refrigerators, freezers, shelves, cabinets or on countertops where blood or other potentially infectious materials are present.
- All procedures involving blood or other potentially infectious materials should be performed in a manner that minimizes splashing, spraying, or splattering.
- Mouth pipetting/suctioning of blood or other potentially infectious materials is prohibited.
- Avoid accidental injuries that can be caused by needles or other sharp items when performing work tasks by using gloves and picking up the item with a shovel or grasping tool instead of the hand. Dispose of all sharp contaminated items at Base First Aid where they will place the item in a specifically designed and designated sharps container.
- Equipment that has been contaminated with blood or other potentially infectious materials shall be examined prior to servicing, storage, or shipment and shall be decontaminated as necessary. If the item or portions of the item cannot be decontaminated for some reason, then a label should be affixed to the piece of equipment stating that it is contaminated. This information should be conveyed to all affected employees so that proper precautions can be taken when handling, servicing, or shipping.
- All gloves, PPE, or clothing contaminated with blood or other potentially infectious materials will be disposed of in sealed containers according to disposal procedures.

Personal Protective Equipment (PPE)

PPE is provided to our employees at no cost. Training in the use of appropriate PPE for specific tasks or procedures is provided by the employee's supervisor and/or designated training personnel.

- Mount Snow will provide appropriate PPE to employees to reduce the likelihood of exposure to bloodborne pathogens.
- Employees must use the employer supplied PPE.
- If damaged or defective, the PPE shall be repaired or replaced as necessary.
- All PPE should be removed prior to leaving the work area.
- When the PPE is removed, it shall be placed in an appropriately labeled container or area for storage, washing, decontamination, or disposal.
- Gloves must be worn when it is reasonably anticipated that the employee may have hand contact with blood or other potentially infectious material.
- Disposable (single use) gloves, such as surgical or examination gloves, shall be replaced as soon as practical when contaminated or as soon as feasible if they

are torn, punctured, or their ability to function as a barrier has been compromised.

- Disposable (single use) gloves shall not be washed or decontaminated for re-use.
- Masks, eye protection, or face shields must be worn whenever splashing, spray, splatter, or droplets of blood or other potentially infectious materials may be generated.

Housekeeping

This is an integral component to post exposure of blood, bloodborne pathogens, or other potentially infectious materials.

- Supervisors will ensure that equipment, working surfaces, and floors are cleaned and decontaminated after contact with blood or other potentially infectious materials. All bins, pails, cans, and similar receptacles that have a reasonable likelihood for becoming contaminated are to be inspected regularly. If the receptacle is visually contaminated it must be cleaned and decontaminated immediately. Examples of this are trashcans or bins in restrooms. These receptacles are often used to dispose blood-carrying products such as expended sharps (injection needles) and sanitary napkins.
- Broken glassware which may be contaminated shall not be picked up directly with the hands. It shall be cleaned up using a brush and dust pan, tongs, or forceps.

Disposal of Contaminated Materials

All items that have been contaminated with blood or other potentially infectious materials are to be disposed of as regulated waste. While it is not practical or economically feasible to place specifically designated waste receptacles at all Mount Snow facilities and work sites, this does not diminish the requirement for proper labeling, handling, and disposal of biohazardous materials. If there is waste material such as needles, sharps, used bandages, gauze, linens, or any other material generated which contains or is contaminated with blood or body fluids, take the following steps:

- DO NOT handle, in any manner, contaminated items without proper PPE.
- Place all contaminated items in a sealable container (in some cases a trash bag tied or taped shut is appropriate) being careful not to contaminate the outside of the container. If the contaminated item is sharp or likely to puncture the container, use a container that is sufficiently sturdy to prevent the puncture of the container walls.
- Label the container prominently to identify that the contents are blood and/or other potentially infectious materials. You should include a biohazard label, as shown in Appendix C.
- Place the container in a secure area with the label completely visible.
- Dispose of gloves and other protective equipment in the same container. Ensure that the outer surface of the glove does not touch the skin as it is removed.
- Call Base First Aid or Rescue to make the necessary arrangement to have the waste material properly disposed of.

Hepatitis B Vaccination

Employees identified in Category I job classifications will be provided at no cost the Hepatitis B (HBV) vaccination. If an employee declines the HBV then he or she must

sign the Hepatitis B Vaccination Declination Form, attached as Appendix B. If an employee has received an HBV from a previous employer, the employee should obtain evidence of that vaccination. Either document must be placed on file.

Communication of Hazards to Employees

Labels and signs shall be affixed to containers of regulated waste as described earlier.

Disposal of Contaminated Materials or other potentially infectious materials for transport, storage, or shipping.

The label must be accompanied by the Biohazard symbol, attached as Appendix C. The symbol should be fluorescent orange or orange-red with lettering and symbols in black or another contrasting color. Affix the label and symbol with string, wire, adhesive or any other method that prevents it from unintentional removal. Red bags or red containers may be used as substitutes for labels provided the symbol is attached. Labels and symbols required for contaminated equipment shall be in accordance with this provision.

Procedures for Post Exposure

In the event an employee has been exposed to blood or other potentially infectious material, the following events should be followed:

- Immediately wash the affected area with soap and water.
- Immediately notify your Supervisor and Rescue
- Attempt to identify the source individual, including name, address and telephone number.
- Complete a blue form
- If applicable, a Post Exposure Evaluation will be performed in accordance with the Exposure Control Plan.

Post Exposure Evaluation

Employees who report a work-related exposure incident will be provided at no cost a medical evaluation. The medical evaluation will consist of:

- A documentation of the route of exposure and circumstances under which the exposure occurred.
- Identification and documentation of the source individual, which may include testing the source individuals blood if consent is given. If consent is given, the results of the test will be provided to the employee.
- A test of the exposed employee's blood with consent.
- Post exposure prophylaxis, when medically indicated, as recommended by the U.S. Public Health Service.
- Counseling; and
- Evaluation of reported illnesses.

Mount Snow shall obtain, and share with the employee, a written opinion from the healthcare provider who performed the medical evaluation within 15 days of completion of the evaluation.

Methods of Transmission

Bloodborne pathogens such as HBV and HIV can be transmitted through contact with infected human blood and other potentially infectious body fluids such as:

- **Semen** (the viscid, whitish fluid from the male)
- **Vaginal secretions** (fluid from the female cervix).
- **Cerebrospinal fluid** (colorless liquid that surrounds the brain and spinal cord).
- **Synovial fluid** (fluid that lubricates and cushions the joint).
- **Pleural fluid** (fluid between the pleural membranes of the lung and the inner chest wall).
- **Peritoneal fluid** (fluid in the gastrointestinal organs).
- **Amniotic fluid** (fluid which surrounds the fetus).
- **Saliva** (in dental procedures).
- Any body fluid that is visibly contaminated with blood.

It is important to know the ways exposure and transmission are most likely to occur in your particular situation, be it providing first aid to a guest or cleaning up blood or vomit in a room or food and beverage outlet.

HBV and HIV are most commonly transmitted through:

- Sexual Contact
- Sharing of hypodermic needles
- From mothers to their babies at/before birth
- Accidental puncture from contaminated needles, broken glass, or other sharps
- Contact between broken or damaged skin and infected body fluids
- Contact between mucous membranes and infected body fluids

In most situations, transmission is most likely to occur because of accidental puncture from contaminated needles, broken glass, or other sharps; contact between broken or damaged skin and infected body fluids; or contact between mucous membranes and infected body fluids. For example, if someone infected with HBV cut their finger on a piece of glass, and then you cut yourself on the now infected piece of glass, it is possible that you could contract the disease. Anytime there is **contact** with infected blood or body fluids, there is a slight potential for transmission.

Unbroken skin forms an impervious barrier against bloodborne pathogens. However, **infected blood can enter your system through:**

- Open sores
- Cuts
- Abrasions
- Acne
- Any sort of damaged or broken skin such as sunburn or blisters

Bloodborne pathogens may also be transmitted through the **mucous membranes** of the

- Eyes
- Nose
- Mouth

Specific Responsibilities:

Department Directors

Department Directors are responsible to budget adequate funds for the purchase, repair, and decontamination of PPE and equipment required and associated with this safety program. Department Directors are responsible for reviewing engineering controls and work practice controls at any time a work task changes or pattern develops that may increase the potential for occupational exposure. Department Directors are also responsible to identify employees for the purposes of classification into the Category I or Category II system employed by the written Exposure Control Plan. Finally, Department Directors are responsible for coordinating the required training as outlined in this safety program.

Supervisors

Supervisors are responsible for the adequate supply and accessibility of PPE for their employees. They are responsible for ensuring that the employees are utilizing the required PPE when necessary. Finally, Supervisors are responsible that actions taken after an exposure incident follow the procedures as outlined in the Procedures for Post Exposure.

Employees

Employees are responsible for taking proper action to prevent the contraction of a blood borne pathogen by utilizing engineering controls, work practice controls, PPE, good housekeeping, and training. Employees are also responsible to notify their Supervisors immediately when a contamination or occupational exposure may have occurred.

Training

Employees will receive training on bloodborne pathogens upon hire or at the time of initial assignment to tasks where occupational exposure may take place. Bloodborne pathogen refresher training will occur annually thereafter. The initial and refresher training should consist of:

- A general explanation of the epidemiology and symptoms of bloodborne diseases.
- An explanation of the modes of transmission.
- An explanation of Mount Snow's Exposure Control Plan.
- An explanation of the appropriate methods for identifying tasks that may involve exposure.
- An explanation of the use and limitations, types, location, and decontamination of PPE.
- An explanation of the basis for selection of PPE.
- Information on the Hepatitis B vaccination.

- Information and procedure if occupationally exposed to blood or other potentially infectious materials.
- An explanation of the signs and labels or color coding.

Recordkeeping

Medical Records:

Mount Snow Ski Patrol will keep records for each employee with an occupational exposure. The record shall include the following:

- Name and date of birth of the employee.
- A copy of the employee's hepatitis B vaccination status, including the dates of vaccination and any medical records relative to the employee's ability to receive the vaccination.
- A copy of all results of examinations, medical testing, and follow up procedures relative to an occupational exposure incident.
- A copy of the healthcare professional's written opinion as described in the Exposure Control Plan.
- A copy of any information provided to the healthcare professional in relation to an occupational exposure.

The medical records are to be kept in a confidential file separate from other personnel and training records.

Mount Snow is responsible for ensuring the confidentiality of the medical records pertaining to occupational exposure and occupational exposure incidents. Mount Snow must not disclose any information, either within or outside the workplace, contained in the medical record without the employee's express written consent. Mount Snow will maintain the medical record for the duration of the employment plus 30 years for the affected employees.

Training Records:

Training records will be maintained by the Rescue Manager and Department Manager in relation to initial and refresher bloodborne pathogen training. The training record shall include the following:

- The date of the training.
- The contents, agenda, or summary of the training.
- The name and job title of the trainer.
- The names and job titles of all employees attending the training.

The training records shall be kept for a minimum of 3 years from the dates on which the training occurred.

Discipline

As a condition of employment, all employees at Mount Snow are required to participate actively in safety programs and follow established health and safety-related policies, procedures, instructions, and/or rules. Disciplinary action, in some instances up to and including dismissal, will be taken in cases where it is determined that disregard for safety and health has occurred.

Appendix B: Hepatitis B Vaccination Declination Form

HEPATITIS B VACCINATION DECLINATION

Completion of this form is mandatory for all Category I and Category II employees who decline to receive the Hepatitis B vaccination prior to or after an exposure incident.

I fully understand that due to my occupational exposure to blood or other potentially infectious materials I may be at risk of acquiring the Hepatitis B virus (HBV).

I have been provided with the opportunity to be vaccinated with the Hepatitis B vaccine at no charge to myself. However, I decline the Hepatitis B vaccination at this time. I fully understand that, by declining this vaccine, I continue to be at risk of acquiring Hepatitis B. 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.

Employee Name

Employee Signature

Date of Birth

Date

Appendix C: Biohazard Symbol

The following is a universal symbol identifying materials or objects contaminated with human blood or other potentially infectious materials. When this symbol is identified, follow all procedures identified in this program to minimize the risk of disease transmission and ensure proper disposal.

