Exposure Control Plan (ECP)



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The following Exposure Control Plan (ECP) has been developed in accordance with the OSHA Blood borne Pathogens Standard, 1910.1030, and is intended to comply with the most up to date AB 300 OSHA standard and local regulations.

The Facility owner is responsible for administering the ECP and providing training to all practitioners that operate in the facility. Training will be provided annually and whenever changes are made to this document or any practices. Changes must be immediately reflected in this document and resubmitted to the El Dorado County Environmental management department for approval.

ECP training records must be available for inspection upon request and maintained on site for a period of 3 years.

Each practitioner is required to have proof of Blood borne Pathogen (BBP) certification and hepatitis B vaccination or declination.

Job Titles:

**Tattooist**:

Preparation of client’s skin; performing tattoo applications; cleaning and disinfecting work areas and equipment used while tattooing; sterilization of equipment and tools; removal of waste from work areas, including bio hazardous or regulated materials .

**Assistant:**

Maintaining and cleaning public common area of Westfall Tattoo, this will include areas that are contaminated; removal of waste from work areas, including bio hazardous materials; cleaning decontamination, disinfection and sterilization of all reusable equipment required for the job.

Methods of Compliance:

**Standard Precautions**:

In our facility, we will observe and practice Standard Precautions. These precautions will minimize and hopefully eliminate employee occupational exposure to BBP. ALL bodily fluids will be considered infectious, regardless of their origin.

In addition to Standard Precautions, both Engineering Controls and Work Practice Controls are used in order to minimize exposure to BBP and Other Potentially Infectious Material (OPIM). Where occupational exposure remains after the institution of these controls, Personal Protective Equipment shall be used.

**Engineering Controls:**

All employees of Westfall Tattoo shall follow Engineering Controls to minimize risk of BBP and OPIM.

* + - * Employee hand washing facilities .
      * Ultra Sonic Cleaning Device.
      * Steam Autoclave (Tuttnauer 1730).
      * Bio hazard Signs and warning labels.
      * Restricted Area Signs .
      * Non-Porous Material for all work surfaces.
      * Non-porous Floors and walls around bio and work areas.

**Review of engineering controls:**

All Engineering and Work Practice Controls will be examined and maintained on a daily basis, if a problem may occur the Owner Nic Westfall will be notified immediately and the actions will be taken for resolution. A class 5 indicator will be used on every load done through the autoclave and spore testing will be done on a regular basis in compliance with California and El Dorado County code. All surfaces will be cleaned before and after EVERY procedure using an approved disinfectant. Tattoo Machines, Bottles, Arm rest, clip-cords, and power supplies must all be covered with single use protective plastics, and replaced after every procedure. ALL the Floors must be mopped and decontaminated on a daily bases.

**Personal Protective Equipment: (PPE)**

When the potential of occupational exposure exists, even after implementation of Engineering and Work Practice Controls, it is the employee’s responsibility to utilize PPE in accordance with OSHA regulations. All personal protective equipment is:

* + - * Provided without cost to the employees.
      * Provided in specific sizes in according to employee needs.
      * Considered appropriate only if it does not permit blood or OPIM to pass through or reach employees.

The Specific type of PPE required for each procedure will depend upon the level of exposure anticipated. The following PPE will be provided and used where appropriate in work areas and will be removed before leaving such work areas:

* + - * Disposable gloved the appropriate size (Wall mounted in every room,)
      * Aprons (in the Bio Room, and Storage Room)
      * Eye Protection (Bio Room Cabinets)
      * Plastic sleeves and arm protection (Bio Room Cabinets)
      * Face Masks (Bio Room Cabinets)
      * CPR Masks (Storage Room, Procedure Area)
      * Utility Gloves (Storage Room)

All PPE will be cleaned, laundered and/or disposed of, as appropriate, by the employer at no cost to the employees. All repairs or replacements of PPE are made by the employer at no cost to the employee. All disposable PPE shall be removed in a manner that prevents contaminating the employee’s skin or clothing, and will be disposed of immediately. All garments that are penetrated by blood shall be removed immediately or as soon as feasible.

The following Protocol has been developed to facilitate leaving the equipment in the work area:

* Waste receptacles shall be used for the disposal of gloves decontamination wipes etc. they are located in every room.
* In the event a personal garment becomes bloody, a bio hazard, it will be cut off the body and not removed over the head. The garment will be considered a bio hazard and will be placed in a regulated waste receptacle.

OSHA recognizes two exceptions to when PPE may NOT be worn:

* + - * When the use of PPE would expose the employee to greater hazard
      * When the use of PPE would prevent the proper delivery of healthcare or public safety services such as those that may arise in the case of an emergency

**Hand Washing:**

Our hand washing facilities are made readily accessible to employees at all times, and are equipped with no touch soap dispensers and single use paper towel dispensers. A hand washing station can be found in all procedure areas and restrooms

Hand Sanitizer will also be mounted on the wall in Every Room

Hand Washing Shall be required but not limited to the following

* Arrival to Work
* Before Procedure
* After Procedure
* When obvious Contamination with bodily fluids occurs
* Departing Work

**Gloves:**

All gloves used in this facility are single use disposable. Employees shall wear clean disposable gloves when:

* + - * Doing any type of procedure that requires skin contact.
      * For removal of all bio hazardous waste
      * For all cleaning duties

Gloves are to be changed/ replaced when:

* + - * They become cut, torn or punctured in any way
      * Between each client
      * When leaving work areas
      * When returning to work areas

**Face, Eye and Respiratory Protection:**

In this facility, face masks in combination with eye protection devices such as face shields with solid sides are required to be worn whenever splashes, spray, splatter, or droplets of blood or OPIM may be generated and eye nose or mouth contamination can be reasonably anticipated. The OSHA standard also requires appropriate protective clothing be worn such as aprons and plastic sleeves.

Face eye and respiratory protective devices are to be:

* + - * Changed between clients
      * Removed when leaving the work area
      * Capable of filtering a minimum of %95 of particles

Pre-Procedure Preparation:

Before performing any body art procedure the following precautions will be taken to reduce and eliminate the risk of exposure to Blood or OPIM:

* + - * Wash hands thoroughly
      * Handwashing: Handwashing is to be performed at the start of work, Before and After every procedure, and before and after every break or anytime you leave and reenter the procedure area
      * Use a new pair of disposable gloved and change as often as needed
      * Do not cross contaminate
      * Use Super Sani-Cloth Germicidal disposable to disinfect all surfaces in the procedure area (2 Min )
      * Make all preparation on a sterile covered surface
      * Cover all tools with addition plastic barriers
      * Cover all areas where skin will contact procedure furniture with bib or barrier
      * Ensure Autoclave Bags have not been punctures before opening
      * Use a single use Needle
      * Only commercially manufactured inks will be used in this shop
      * Tattoo Machines are to be completely wraps in medical machine bags an sealed with medical tape and cleaned with: Super Sani-Cloth Germicidal disposable wipes. 2 minute kill time, Kills RSV and TB in 1 minute, Kills HBV and HIV-1 in 2 minutes
      * Machines, clip cord, water bottle, alcohol bottle, green soap bottle, and power supply are to be fully covered with plastic Bags and sealed with rubber bands or tape. Tattoo Chairs and Workstations will be covered with dental bib and dental bed cover.
      * Shaving – If the client is to be shaved, sterilize the skin with Alcohol, and use a disposable, one time use, Bic Razor. Dispose of the razor in the SHARPS container supplied at each station (use green soap for shaving comfort)
      * Simple Green Soap and water or other sterile stencil transfer agent is to be used for stencils

Post-Procedure Break Down:

After performing any body art procedure the following precautions will be utilized to reduce and eliminate the risk of exposure to blood and OPIM

* + - * Gloves will be removed, and hand washing will be performed
      * Fresh gloves will be worn to break down the procedure area
      * All surfaces will be decontaminates
      * Any reusable steel contaminated equipment will be transferred using a leak proof container with a Lid for further decontamination and soaking in the Bio Room
      * Tubes will be soaked in a stainless steel container with lid
      * Stainless Steel Container will remain on a easy to clean stainless steel table in the bio room

**Accidental Spill Procedure:**

-If biohazard or sharps are to accidently spill, ensure full PPE is being worn, carefully place cleanup in non-puncture SHARPS container and transfer to the biological waste receptacle located in the BIO room, Use Germicidal Sani wipes to thoroughly wipe the area down, let stand for at least 2 minutes.

Facility Cleaning and Decontamination:

The following Rooms will be cleaned and decontaminated according to the following schedule

**Waiting Area and Hallways Office:**

Thisarea is to be swept and mopped daily or as frequently as needed. The following items are to be cleaned and disinfected at the beginning of each day: Floors Shelves, tables, displays, furniture etc. Cleaning and disinfecting these areas will be accomplished using

* + - * Formula 409
      * Pine Sol ALL PURPOSE
      * Windex Ammonia D/Original

**Restroom:**

Thisarea is to be swept and mopped daily or as frequently as needed. The following items are to be cleaned and disinfected at least TWICE a day to reduce risk: Sink, fixtures, mirror, paper towel dispenser, door knob, light fixtures, toilet. Cleaning and disinfecting these areas will be accomplished using

* + - * Formula 409
      * Pine Sol ALL PURPOSE
      * Windex Ammonia D/Original

**Work Station:**

Thisarea is to be swept and mopped daily or as frequently as needed. All aspects of the area are to be thoroughly disinfected at the start of each procedure. All Work Area surface are to be kept at a high level of disinfection at all times! The following items are to be disinfected before and after each procedure:

* + - * Client Chair
      * Arm Rest
      * Mayo Stand
      * Counter Tops
      * All potentially contaminated surfaces!

Disinfection is accomplished by wiping the surface with a disinfectant-soaked paper towel, using the following actions:

Disinfectant is sprayed into the paper towel and then applied to the surface, Disinfectants are not sprayed onto surfaces in order to minimize spray back. Disinfectant shall remain on surface in accordance tot the manufacturer’s instructions or no less than 10 minutes

Disinfection and cleaning will be accomplished using the following intermediate-level disinfecting solutions and cleaners

* + - * Madacide 1
      * Sani-Cloth Germicidal wipes
      * Formula 409
      * Pine Sol All Purpose

Decontamination Area (Bio Room)

This area of the shop will have restricted access to employees only and will be declares so using the appropriate signage. This area will be swept and mopped daily. All areas, counters, cabinets and walls are to be decontaminated at the beginning of each day or as frequently as needed to reduce risk of exposure to BBP and OPIM and to reduce the risk of cross contamination between areas. Cleaning and disinfecting will be accomplished with

* + - * Madacide
      * Alconox Ultrasonic Concentrate
      * All-purpose cleaner
      * Windex Ammonia D/original
      * Pine sole all purpose

Decontamination of all reusable equipment shall take place in the designated decontamination area only. This area is labeled as restricted bio hazardous area, and is not easily accessible to the public. Posted signs indicate the need to full PPE when working in this area. In this area you are required to wear:

* + - * Disposable gloves
      * Plastic sleeves
      * Apron
      * And face mask

Sterilization Methods and Spore Testing: (Autoclave)

Autoclave Steam Sterilization using the Tuttnauer 1730 is used at this facility for the sterilization of all steel tubes and reusable equipment. (Only steel tubes are used in this facility,)

**Pre-Soak Tub and Ultrasonic**

Presoaking shall be done in a stainless steel tub with aclosed lid and stored on a stainless steal table in the bio decontamination room. Soaking agents used:

* + - * General disinfectant
      * Sklar Soak
      * Madacide

Each tube shall be ran through two cycles in a Professional grade medical ultrasonic before it is hand scrubbed wearing PPE. The tools must be allowed 30 minutes to dry before they are bagged in instrument sterilization packs and placed in the autoclave.

All sterilized equipment must be stored in a sterilized sealed container until they are ready to be used. At that point the sealed equipment will be opened in front of the Client and documentation will be recorded: load # time and date of load, on the Clients Release Form

For All disposable pre-sterilized instruments this facility will keep a record of purchase for a minimum of 90 days after use. Please contact Nic Westfall for such documentation

The Autoclave is to be loaded with NO more the 8 tubes at a time, each tube shall be sealed in a sterilization pouche with name and date of user, placed PLASTIC down. Class V indicator is placed in one of the pouches

If a sterilization pouch is compromised, start the sterilization process from the beginning

**Autoclave Standards:**

Duration: 30 Minute

Temperature: 274f/134c

PSI – 15 minimum

**Monitoring:**

Mechanical, chemical and biological tests are used to monitor the sterilization process

* + - * Gauges, dials and read-outs on unit
      * Chemical class 5 steam sterilization indicator strip with every load
      * Biological Spore Tests monthly

Biological indicators always to be used during:

* Initial Installation
* After Major Repairs
* At least once per month

All information shall be logged on every load: Date, Load #, Content, operator, time, temp, indicator results, and spore tests results when included.

**Spore Testing:**

Spore tests are conducted on a monthly basis on all autoclaves. Spore testing for Westfall Tattoo is done at:

Mesa Laboratories, inc. Po Box 10310. Bozeman Mt 59719

* 24 hour incubation of steam tests
* Prompt telephone notification on all failed tests
* Quarterly Statement of Test Results
* Secure access to test results online 24 hours a day, 7 days a week
* Email Reminders to Test
* Gram staining verification on all failed tests
* A control strip that accompanies each test strip
* Certificate of Participation

If A monthly Spore test fails, the unit is to be turned off until cleaned and repairs are made. Unit will remain out of commission until we have a passed test from Mesa Labs, If repairs are not possible a new unit will be purchased. Only Disposable tubes will be used until Spore test is passed

Sterilization logs will be help for 5 years

If a sterilization pouch is compromised, start the sterilization process from the beginning

Trash/Waste:

All solid waste is to be removed at least once per day, or as often as needed to prevent overfilling. All containers used for storage of contaminated equipment shall be monitored throughout the day and shall be emptied at least once per day, or as often as needed to eliminate overflow

Sharps:

Contaminated Sharps is defined as any contaminated implement that is capable of perforating, puncturing, or penetrating the skin barrier and is classifies as a single use item such as needles and razors. The following steps are taken to reduce exposure to contaminated sharps:

* + - * All sharps are places into a PSHA compliant container immediately after use.
      * No sharp is ever used on more than one client
      * Always where gloves when handling and disposing of sharps

**Sharps Containers:**

All contaminated sharps are to be places immediately after use into an OSHA compliant sharps container. All sharps containers used at this facility are puncture resistant, bio hazard labeled, leak proof, and locked in a wall mount. All sharps containers shall remain upright throughout their use. Containers are located in the bio room and procedure areas.

**Sharps Container Monitoring, Disposal and Replacement:**

All Practitioners are responsible for the monitoring disposal and replacement of sharps containers. A sharps container must immediately be replaced when:

* + - * The container is full
      * 30 days from installations (installation date will be marked on front)
      * If the container becomes damaged

All regulated waste, sharps and other biohazard materials intended for disposal shall be kept in a restricted collection area in the bio room. Disposal of All regulated waste shall be in accordance with federal and state regulations. At this facility all regulated waste is picked up and disposed of by:

STERICYCLE INC. (medical and biohazard waste disposal)

ACCT # 6136467

Labels and Signage:

At this facility warning labels reading BIOHAZARD shall be affixed to any containers used to transport, store, or ship any contaminated items. These labels shall be Bright Orange or Red and shall be attached in manner that prevents the removal or falling off of the label.

Anytime a solution is transferred from its original container into a secondary container the secondary container must be labeled with the full name of the solution

At this facility signs are posted at work entrances that are restricted to employee access only. Signs are also posted at all entry and exit points in the facility that are clearly marked and are in compliance with local building codes.

Infectious Disease Information:

At this facility employees are informed of the risk of exposure to infectious diseases, and educated on how to prevent contracting such diseases. Education includes but is not limited to: Hepatitis B, Hepatitis C and HIV. Employees have been informed of the following:

**Hepatitis B:**

-Hepatitis B also known as HBV, is a BBP disease primarily transmitted by blood contamination, sexual contact, needle sharing and at birth being carried over from the mother

-The virus has been found in semen, breast milk, vaginal secretions, urine tears and blood

-The HBV Virus attacks and destroys liver tissue and can lead to death

-Hepatitis B poses the most significant risk to healthcare professionals

-Employees who come into contact with blood or OPIM are at risk of HBV

-Hepatitis B vaccine is available and is safe and effective for preventing this serious disease

-Some people never experience symptoms, however the most common symptoms are:

* + - * Fatigue
      * Mild Fever
      * Muscle and joint Aches
      * Nausea
      * Vomiting
      * Diarrhea
      * Abdominal Pain
      * Jaundice

**Hepatitis B Vaccination Program:**

Inthisfacility all employees have been made aware of the following:

* + - * Hepatitis Vaccination is available to all employees at no cost
      * HBV vaccination will be administer by a professional health care physician
      * All associated Lab test will be done at an accredited facility
      * Employees who decline the vaccination are required to sign a HBV declination form
      * Records will be kept for each employee in a locked secure location

**Hepatitis C:**

-Hepatitis C, also known as HCV, is an infection of the liver and is spread by the direct contact with the blood of the infected person.

-HCV can be transmitted from needle sticks occurring in the workplace where the source individuals infected blood is transmitted to the employee, or the other common vectors for a BBP.

-Unlike HBV, there is no vaccine for Hepatitis C

-Many people with HCV do not have symptoms, however, some people with HCV experience the following symptoms:

* + - * Fatigue
      * Mild Fever
      * Nausea
      * Lack of appetite
      * Diarrhea
      * Dark Yellow Urine
      * Light colored stools
      * Jaundice

**HIV:**

-HIV, Human immunodeficiency Virus is a BBP that has no cure.

-There is no vaccination for HIV

-Employees who come into contact with blood or OPIM are at risk of exposure to HIV

-Symptoms of HIV include but are not limited to:

* + - * Weakness
      * Fever
      * Sore throat
      * Nausea
      * Headaches
      * Diarrhea
      * White coating on tongue
      * Weight loss
      * Swollen Lymph glands

Exposure Incident Policy:

In the case of an incident the location of the FIRST AID KITS are located in the bathroom and the procedure area.

* In case of contact with blood or OPIM Wash the area immediately with soap and water,
* For exposure to eyes, mouth, and /or nose flush with water
* Immediately go to a healthcare facility
* Take source individual with you for testing if possible

**Procedure for reporting, investigating and documenting:**

When an employee experiences an exposure incident, the employee should immediately report to the Owner: Nic Westfall or Manager on Duty

The facility Owner Nic Westfall will be responsible for investigating and documenting the incident:

Entry in the Injury and Illness incent Report (OSHA form: 301)

Entry in the Sharps injury log, identity of injured employee will be protected

This person shall be responsible for ensuring the effectiveness of the exposure incident policy and appropriately maintain all records related to the exposure incident, ensuring the confidentiality of the exposed employee.

**Exposure Incident Report:**

The exposure incident report and evaluation will include the following information:

* + - * Route of exposure
      * Type of Sharps involved
      * Circumstances surrounding the exposure
      * ID source individual if possible
      * If Permissible and consent is given, the blood of the source may be tested
      * The Source individual’s blood test results will be made available to the exposed employee

**Employee Exposure Incident Follow-Up**

Should the employee choose the following steps may be taken after am exposure occurs:

* After providing consent, employee may have blood sample taken to be tested for HIV, HBV and BCV status. This sample will be collected as soon as feasible, testing will be performed at no cost to the employee
* Employees blood sample will be preserved for up to 90 days for a second testing at no cost to the employee
* Exposed employees will be offered post exposure evaluation, and follow-up at no cost to the employee
* Exposed Employee will be offered exposure prophylaxis measures at no cost to the employee, in accordance with the current recommendations of the U.S. Public Health Service.

**Exposure Information Provided to Healthcare Professionals:**

In the event of an exposure incident, Nic Westfall shall ensure that the attending healthcare professional is provided with the following information regarding the exposure incident

* + - * Copy of BBP standard
      * Written explanation of the exposed employees duties as they pertain to the incident
      * Copy of the completed BBP Exposure Incident Report
      * Results of the source individuals blood testing if available
      * Exposed employees medical records, including vaccination status

A written opinion shall be obtained from the healthcare professional(s) who evaluate the employees of this facility. The employer shall obtain and provide the employee with a copy of the evaluation health care professionals written opinion within 15 days of the completion of the evaluation

Nic Westfall will provide a copy of the written evaluation to the employee and only the employee

Healthcare professionals will be instructed to limit their written opinions to the following:

* + - * Summary of Vaccination Status
      * Written verification that the exposed employee has been made aware of the evaluation results
      * All other finding or diagnoses shall remain confidential and shall not be included in the written report

Employee Record Keeping:

All records of Vaccinations, Declinations, and Exposure Reports shall be:

* + - * Maintained under lock and key by Nic Westfall
      * Kept in strict confidentiality and will not be released without employee’s written consent
      * Made available to the employee for examination upon request
      * Made available to the Chief of the Division of Occupational Safety and Health and the National Institute of Occupational Safety and Health

In the event that records must be transferred and there is no successive owner/employer to receive and retain records for the prescribed period of employment, plus 30 years. The Chief of DOSH shall be contacted for final disposition,

Training:

BBP training, for all employees, will be conducted before initial assignment to tasks where occupational exposure may occur. Employee training will include an explanation of the following

* + - * The OSHA BBP standard
      * Epidemiology and the symptoms of blood borne disease
      * Modes of BBP transmission
      * Exposure plan
      * Procedures in this facility that may lead to exposure to blood or OPIM
      * Control methods used at this facility to control exposure
      * PPE
      * Important contact information
      * Post exposure evaluation and follow-up
      * Signs and Labels used for this facility
      * HBV vaccination program

Training shall occur at the point of hire, annually, when change in duties occurs and whenever there is a change in standard

All training will be done by Nic Westfall and appropriate agencies. At this facility employees will receive training in the following formats:

* + - * Witten Materials
      * Videotapes and lecture material
      * Product examples
      * Questions and Answers

**Westfall Tattoo is dedicated to providing a safe and healthy work environment for all of its employees. This Bloodborne Pathogens Exposure Control Plan is evidence of our commitment**