



BLOODBORNE PATHOGENS



Purpose

Arrow S Energy Operating is committed to providing a safe and healthful work environment for our employees and through this plan we eliminate or minimize the possibility of infection.

Scope

This program addresses the minimum federal requirements of all occupational exposure to blood or other potentially infectious materials (examples of potentially infectious materials include bodily fluids containing hepatitis B, HIV, etc.). This program applies to all locations where the potential for exposure to bloodborne pathogens exists and for full-time, part-time, contract, temporary and per diem employees. When work is performed by a contractor on a company site, the contractor's program shall take precedence. However, this program may be adopted for use by contractors who do not have a formal Bloodborne Pathogen Exposure Control Plan.

Key Responsibilities

Exposure Control Officer (HSE Director)

Has overall responsibility for developing and implementing the Exposure Control Procedure for all facilities.

Site Project Manager and Supervisors

Site project manager and supervisors are responsible for exposure control in their respective areas.

Employees

- Know what tasks they perform that have occupational exposure.
- Plan and conduct all operations in accordance with regulatory requirements.
- Develop good personal hygiene habits.

Procedure

Training

Training shall be provided at the time of initial assignment to tasks where occupational exposure may take place, and at least annually thereafter. Annual training for all employees shall be provided within one year of their previous training. Training shall include:

- What bloodborne pathogens are; how to protect themselves from exposure
- Methods of warnings (signs, labels, etc.)
- The OSHA requirements of bloodborne pathogens
- The Hepatitis B vaccine shall be made available to all employees that have occupational exposure at no cost to the employee(s).
- The HSE Director shall be trained in Health Insurance Portability and Accountability Act HIPAA requirements upon assignment of the director position.



Biohazard Label

Training records shall be maintained for 3 years from the date on which the training occurred and shall include at least the following:

- Outline of training program contents.



- Name of person conducting the training.
- Names and job titles of all persons attending the training.
- Date of training.

Availability of Procedure to Employees

All employees will have access to a copy of the exposure control plan located at Arrow S Energy Operating Office

Reviews and Update of the Procedure

The procedure is reviewed annually and updated whenever we establish new functional positions within our operations that may involve exposure to biohazards and/or as federal or state regulations change.

Exposure Determination

- There are no job classifications in which some or all employees have occupational exposure to bloodborne pathogens that may result from the performance of their routine duties.
- All Arrow S Energy Operating employees work in the Denver office within a three to four minute radius of prompt medical attention and so there are no company designated employees who are trained to render first aid and basic life support. Some employees may have current first aid training and so rendering first aid or basic life support in the event of an injury does provide the possibility of exposure to employees to bloodborne pathogens. In such a case those individuals will be required to adhere to this program.
- All minor first aid injuries occurring within company operations or on company time require self-rendered first aid. No employee is allowed to render first aid to a minor injury of another employee where bloodborne pathogens could be transferred.
- In addition, no medical sharps or similar equipment is provided to, or used by, employees rendering first aid or basic life support.
- This exposure determination has been made without regards to the Personal Protective Equipment that may be used by employees.

Methods of Compliance

Universal Precautions

When differential between body fluids is difficult or impossible, all body fluids will be considered potentially infectious.

Work Practice Controls

- Personal hygiene and sharps practices controls shall be used to eliminate or minimize exposure of bloodborne or body fluid transfer to other workers.
- Containers for contaminated reusable sharps are not provided by the company at any work site or company controlled or owned property.
- Workers who utilize sharps for personal reasons are expected to dispose of such sharps materials in accordance with all applicable laws.
- First aid stations must be stocked with medical grade disposable gloves.
- Following any contact of body areas with blood or any other infectious materials, employees wash their hands and any other exposed skin with soap and water as soon as possible.



- Hand washing facilities shall be available. If hand washing facilities are not feasible Arrow S Energy Operating will provide either an appropriate antiseptic hand cleanser in conjunction with cloth/paper towels or antiseptic towelettes.
- Food and drink are not kept in refrigerators, freezers, on countertops or in other storage areas where potentially infectious materials are present.
- All equipment or environmental surfaces shall be cleaned and decontaminated after contact with blood or other infectious materials.
- Bloodborne pathogens kits are located in company offices and are to be used only in emergency situations by the trained caregiver. Once the seal is broken on kit and any portion has been used it is not to be reused. Bloodborne Pathogen Kits shall be ordered and replaced promptly.
- Biohazard bags are identified by stickers and located in the first aid area.

Personal Protective Equipment (PPE)

Company employees shall adhere to the following practices when using their personal protective equipment:

- When the possibility of occupational exposure is present, PPE such as gloves, gowns, etc. is to be provided at no cost to the employees.
- All PPE shall be of the proper size and readily accessible.
- Any garments penetrated by blood or other infectious materials must be removed and disposed of immediately.
- All potentially contaminated personal protective equipment must be removed prior to leaving a work area.
- Gloves must be worn whenever employees anticipate hand contact with potentially infectious materials or when handling or touching contaminated items or surfaces.
- Disposable gloves must be replaced as soon as practical after contamination or if they are torn, punctured or otherwise lose their ability to function as an "exposure barrier".
- Any PPE exposed to bloodborne pathogens shall be disposed of properly.
- PPE should be cleaned, laundered & properly disposed of if contaminated.
- Arrow S Energy Operating will repair and replace PPE as needed to maintain its effectiveness.

Housekeeping

Our staff employs the following practices:

- All equipment and surfaces are cleaned and decontaminated after contact with blood or other potentially infectious materials.
- Protective coverings (such as plastic trash bags or wrap, aluminum foil or absorbent paper) are removed and replaced.
- All trash containers, pails, bins, and other receptacles intended for use routinely are inspected, cleaned and decontaminated as soon as possible if visibly contaminated.
- Potentially contaminated broken glassware is picked up using mechanical means (such as dustpan and brush, tongs, forceps, etc.).

Cleaning Up of Infectious Substance



The following is the protocol for trained individuals to clean up blood spills in the workplace:

- Block off the area so no other people come into contact with the spill.
- Put on gloves and other PPE.
- Wipe up as much of the spill as possible with absorbent towels. Always work from the outside of the spill and move inward to avoid any spread.
- Pour a 10% bleach mixture (1 part bleach to 9 parts water) over the entire affected area.
- Let the bleach sit for 20 minutes.
- Use fresh paper towels to wipe up all of the bleach and remaining spill.
- If there are any sharp objects that need to be picked up, don't use your hands. Use a broom and dustpan to safely remove anything that could cut your skin.
- Disposable clean-up materials including all PPE should go into a sealed container or plastic bag labeled as biohazard to warn anyone who comes into contact with the bag that it contains human waste that could be hazardous or harmful. Double-bag if necessary.
- Dispose of infectious waste in compliance with the local department of health guidelines.
- When you are finished, thoroughly wash hands with soap and water.
- Exposure incidents shall be reported to the Arrow S Energy Operating safety advisor and documented in the company incident notification system.

Post-Exposure and Follow Up

Post-Exposure Evaluation & Follow-Up

In the event of an incident where exposure to bloodborne pathogens occurs, there will be an investigation of the circumstances surrounding the exposure incident and making sure that our employees receive medical consultation and immediate treatment.

The Arrow S Energy Operating HSE Director will prepare a documented investigation of any bloodborne pathogens exposure to prevent similar incidents from occurring in the future. The company will provide an exposed employee with the following confidential information:

- Documentation regarding the routes of exposure and circumstances under which the exposure incident occurred.
- Identification of the source individual (unless not feasible or prohibited by law).

Once these procedures have been completed, an appointment is arranged for the exposed employee with a qualified healthcare professional to discuss the employee's medical status. This includes an evaluation of any reported illnesses, as well as any recommended treatment.

Information Provided to the Healthcare Professional

- A copy of the Biohazards Standard.
- A description of the exposure incident.

Healthcare Professional's Written Opinion



After the consultation, the healthcare professional provides our facility with a written opinion evaluating the exposed employee's situation. We, in turn, furnish a copy of this opinion to the exposed employee. The written opinion will contain only the following information:

- Whether Hepatitis B Vaccination is indicated for the employee.
- Whether the employee has received the Hepatitis B Vaccination.
- Confirmation that the employee has been informed of the results of the evaluation.
- Confirmation that the employee has been told about any medical conditions resulting from the exposure incident which require further evaluation or treatment.
- All other findings or diagnoses will remain confidential and will not be included in the written report.

Recordkeeping

Accurate medical records for each employee with occupational exposure must be maintained for the term of employment plus 30 years and shall include at least the following:

- Employee's name, Social Security number and Arrow S Energy Operating employee number if applicable.
- Employee's Hepatitis B vaccination status, including vaccination dates.
- All results from examinations, medical testing and follow-up procedures, including all health care professional's written opinions.
- Information provided to the health care professional.
- Any Hepatitis B Vaccine Declinations.

Medical records will be maintained as confidential and access by affected employees will be upon request within 15 working days.

VACCINATION DECLINATION FORM

Date: _____

Employee Name: _____

Employee ID#: _____

I understand that due to my occupational exposure to blood or other potential 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 the Hepatitis B vaccination currently. 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.

Employee Signature

Date

Facility Representative Signature

Date

Version: 1
Uncontrolled copy if printed.

Date: 08/21/2022
Valid on day of printing only.



POST-EXPOSURE EVALUATION AND FOLLOW-UP CHECKLIST

The following steps must be taken, and information transmitted, in the case of an employee's exposure to bloodborne pathogens:

ACTIVITY

COMPLETION DATE

Employee furnished with documentation regarding exposure incident.

Source individual identified.

() Source individual

Appointment arranged for employee with healthcare professional.

()

Professional's name

Documentation forwarded to healthcare professional

Bloodborne Pathogens Standard

Description of exposed employee's duties

Description of exposure incident, including routes of exposure