

EXPOSURE CONTROL PLAN

POLICY

Geaux Polish LLC is committed to providing a safe and healthful work environment for our entire staff. In pursuit of this endeavor, the following exposure control plan (ECP) is provided to eliminate or minimize occupational exposure to bloodborne pathogens in accordance with OSHA standard 29 CFR 1910.1030, "Occupational Exposure to Bloodborne Pathogens."

The ECP is a key document to assist our Company in implementing and ensuring compliance with the standard, thereby protecting our employees. This ECP includes:

- * Determination of employee exposure
- * Implementation of various methods of exposure control, including:
 - Universal precautions
 - Engineering and work practice controls
 - Personal protective equipment
 - 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

- Geaux Polish LLC and each Dental Facility are both responsible for the implementation of the ECP. Both will maintain, review, and update the ECP at least annually, and whenever necessary to include new or modified tasks and procedures. Contact phone number: 225-242-9912.
- Those employees who are determined to have occupational exposure to blood or other potentially infectious materials (OPIM) must comply with the procedures and work practices outlined in this ECP.
- Each Dental facility will maintain and provide all necessary personal protective equipment (PPE), engineering controls (e.g., sharps containers), labels, and red bags as required by the standard. Geaux Polish LLC will ensure that adequate supplies of the aforementioned equipment are available in the appropriate sizes.
- Geaux Polish LLC will be responsible for ensuring that all medical actions required are performed and that appropriate employee health and OSHA records are maintained.
- Geaux Polish LLC will be responsible for training and documentation of training. Both Geaux Polish and the Dental Facility will be responsible for making a written ECP available to employees.

EMPLOYEE EXPOSURE DETERMINATION

The following is a list of all job classifications at our establishment in which all employees have occupational exposure:

| <u>JOB TITLE</u> | <u>LOCATION</u> |
|------------------|-----------------|
| Dental Hygienist | Dental Facility |

METHODS OF IMPLEMENTATION AND CONTROL

Universal Precautions

- All employees will utilize universal precautions.

Exposure Control Plan

- Employees 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. Geaux Polish and the Dental Facility are responsible for reviewing and updating their 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 specific to each dental facility.
- Sharps disposal containers are inspected and maintained or replaced by each dental facility whenever necessary to prevent overfilling.
- The dental facilities are responsible for identifying the need for changes in engineering controls and work practices.
- The dental facilities are responsible for evaluating new procedures or new products regularly.

Personal Protective Equipment (PPE)

- PPE is provided to Geaux Polish employees at no cost to them by the dental facilities. Please report to Geaux Polish immediately if the dental facility do not have appropriate PPE's on site.
- The types of PPE that should be available to employees are as follows: Gloves, masks, and safety glasses. Uniforms and lab coats are the employee's responsibility.
- PPE's are located at each dental facility and may be obtained through locating at each office (ask a staff member if unsure where to find them).
- All employees using PPE must observe the following precautions:
 - Wash hands immediately or as soon as feasible after removal of gloves or other PPE.
 - Remove PPE after it becomes contaminated, and before leaving the work area.
 - Used PPE may be disposed of in disposal can provided by the dental facilities.
 - 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.
 - Utility gloves may be decontaminated for reuse 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 immediately or as soon as feasible any garment contaminated by blood or OPIM, in such a way as to avoid contact with the outer surface.

Housekeeping

- Regulated waste is placed in containers which are closable, constructed to contain all contents and prevent leakage, appropriately labeled or color-coded (see Labels), and closed prior to removal to prevent spillage or protrusion of contents during handling.
- The procedure for handling sharps disposal containers and other regulated waste is site specific.

- Contaminated sharps are discarded immediately or as soon as possible in containers that are closable, puncture-resistant, leakproof on the sides and bottoms, and labeled or color coded appropriately. Sharps disposal containers are available at each dental facility and should be located for use.
- Bins and pails are cleaned and decontaminated as soon as feasible after visible contamination. Broken glassware which may be contaminated is picked up using mechanical means, such as a brush and dust pan.

HEPATITIS B VACCINATION

Records of vaccination is required at hire, however, if an employee chooses to decline vaccination, the employee must sign a declination form. Documentation of vaccination or refusal of the vaccination is kept on file.

POST-EXPOSURE EVALUATION AND FOLLOW-UP

- Should an exposure incident occur, please report to the Dental Facility and contact Geaux Polish ASAP at 225-242-9912.
- An immediately available confidential medical evaluation and follow-up may be conducted by physician of choice.
- Following the initial first aid (clean the 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 an exposure incident, and test blood for HBV and HIV serological status
 - If the employee does not give consent for HIV serological testing during collection of blood for baseline testing, preserve the baseline blood sample for at least 90 D-9 days; if the exposed employee elects to have the baseline sample tested during this waiting period, perform testing as soon as feasible.

ADMINISTRATION OF POST-EXPOSURE EVALUATION AND FOLLOW-UP

- Geaux Polish ensures that health care professional responsible for employee's hepatitis B vaccination and post-exposure evaluation and follow-up are given a copy of OSHA's bloodborne pathogens standard.
- Geaux Polish ensures that the health care professional evaluating an employee after an exposure incident receives the following:
 - description of the employee's job duties relevant to the exposure incident
 - route(s) of exposure
 - circumstances of exposure
 - if possible, the results of the source individual's blood test
 - relevant employee medical records, including vaccination status

- Geaux Polish provides the employee with a copy of the evaluating health care professional's written opinion within 15 days after completion of the evaluation.

PROCEDURES FOR EVALUATING THE CIRCUMSTANCES SURROUNDING AN EXPOSURE INCIDENT

- Geaux Polish will review the circumstances of all exposure incidents to determine:
 - engineering controls in use at the time
 - work practices followed
 - a description of the device being used (including type and brand)
 - protective equipment or clothing that was used at the time of the exposure incident (gloves, eye shields, etc.)
 - location of the incident
 - procedure being performed when the incident occurred
 - employee's training
- Dental facility and Geaux Polish will both record all percutaneous injuries from contaminated sharps in the Sharps Injury Log.

EMPLOYEE TRAINING

- All employees who have occupational exposure to bloodborne pathogens receive training conducted by Geaux Polish through Medsafe.
- All employees who have occupational exposure to bloodborne pathogens receive training on the epidemiology, symptoms, and transmission of bloodborne pathogen diseases. In addition, the training program covers, at a minimum, the following elements:
 - a copy and explanation of the standard
 - an explanation of our 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 information on its efficacy, safety, method of administration, the benefits of being vaccinated, and 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 for 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. Training materials for this facility are available at <https://www.medsafe.com>. Log in information will be provided to you by Geaux Polish upon hiring.

RECORDKEEPING

- Training Records
 - Training records are completed for each employee upon completion of training. These documents will be kept for at least three years.
 - The training records include: the dates of the training sessions, the contents or a summary of the training sessions, the names and qualifications of persons conducting the training, and the 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 Geaux Polish.
- 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." Geaux Polish is responsible for maintenance of the required medical records. These confidential records are kept for at least the duration of employment plus 30 years. Employee medical records are provided upon request of the employee or to anyone having written consent of the employee within 15 working days. Such requests should be sent to Geaux Polish.
- 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 Geaux Polish.
- 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:
 - the date of the injury
 - the type and brand of the device involved
 - the department or work area where the incident occurred
 - an explanation of how the incident occurred.

This log is reviewed at least annually as part of the annual evaluation of the program and is maintained for at least five years following the end of the calendar year that they cover. If D-12 a copy is requested by anyone, it must have any personal identifiers removed from the report.