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SAFETY PLAN **Bloodborne Pathogens,** **Infectious Waste, and Hazardous Waste**

Under Montana law, schools are required to develop and implement a safety plan to reduce workplace injuries and illnesses. Among other safety-related issues, the safety plan is to address bloodborne pathogens, infectious waste and hazardous waste. This guidance sheet will provide Montana schools with basic information for complying with the provisions of the safety plan requirements related to bloodborne pathogens, infectious waste and hazardous waste.

Bloodborne Pathogens

The U.S. Occupational Safety and Health Administration (OSHA) has adopted standards to help protect workers from on-the-job exposure to and potential infection with bloodborne pathogens such as hepatitis B virus (HBV) and human immunodeficiency virus (HIV). These standards are enforceable in Montana schools via the Montana Department of Labor and Industry (DLI). By December 1, 1994 the DLI will adopt all OSHA standards, including the safety standards for bloodborne pathogens. Under several Montana laws (the Montana Safety Act and the Montana Safety Culture Act), the DLI has jurisdiction to monitor compliance with the safety standards in all public sector worksites, including schools.

The bloodborne pathogen standards require employers to develop an exposure control plan, provide protective equipment for employees, provide hepatitis B vaccinations for certain employees, and provide training for all employees.

The **exposure control plan** can be part of the school's overall Safety Plan which schools are required to have under the Montana Safety Culture Act. **Protective equipment** appropriate for the expected risk of exposure is to be provided to school personnel performing activities that may expose the employee to bloodborne pathogens or to contaminated equipment or material. Pre-exposure **HBV vaccinations** are required only when employees, in the course of performing their required job duties, are routinely exposed to blood or other potentially infectious materials. Post-exposure vaccinations are required within 24 hours in situations involving HBV exposure as a result of collaterally providing first aid assistance. Annual **training** is required for all employees, and training is to be done whenever job assignments or job procedures change which affect employee exposure potential.

"It is the mission of the Office of Public Instruction to improve teaching and learning through communication, collaboration, advocacy, and accountability to those we serve."

The DLI is available for consultation on developing and adopting a Safety Plan. Detailed recommendations for schools for complying with the bloodborne pathogen standards are available from the Montana Department of Labor and Industry, Safety Bureau, PO Box 1728, Helena MT 59624, (406) 444-6401. The DLI also provides fact sheets of the key provisions of the bloodborne pathogen standards and on HBV vaccinations. A copy of the recommendations and fact sheets are attached to this guidance sheet.

Infectious Waste

Handling and disposing of potentially infectious waste material is an issue for schools. The Montana Department of Environmental Quality (DEQ) does not apply the Montana Infectious Waste Management Act to schools because dispensing health care services that generate infectious waste is not a normal school activity, and the quantity of potentially infectious material generated is insignificant.

Waste materials produced in a school setting should be handled in the following manner:

- Potentially infectious materials (e.g., vomitus, bloody tissues) can simply be deposited in the school trash collection system. Discarded feminine hygiene products are not considered infectious waste and may be disposed of via the regular trash collection system. It is recommended to "double-bag" the wastes before disposing. (Note: Using biohazard bags is not recommended for schools because regular trash collectors cannot legally dispose of trash labeled as a biohazard.) In an attempt to limit the infection potential of waste materials, school personnel may saturate the bagged materials with at least a one percent bleach solution, though it is not necessary to do so.
- If a school staff member must be involved in the handling and disposal of medical sharps, such as syringes, hypodermic needles or other potentially infectious objects which are capable of penetrating the skin, these items should be containerized in labeled sharps containers. Procedures for disposing of sharps containers must follow the requirements of the Montana Infectious Waste Management Act.

For more information on potentially infectious waste materials in school settings, contact the DEQ Waste Management Section at (406) 444-5300.

Infection control equipment (first aid kits and body fluid clean-up kits) should be available at all schools and should have the recommended contents listed in the "Infection Control Equipment" information sheet (see attached) available from OPI.

Hazardous Waste

Under the Montana Safety Culture Act, schools are required to have a safety plan. The plan can incorporate an exposure control plan (see the section of this guidance sheet on bloodborne pathogens) and a hazardous waste disposal plan along with other safety-related items.

Hazardous wastes are materials that are easily combustible or flammable, corrosive, chemically unstable and reactive, and toxic. Examples of hazardous material that may be found at schools include solvents, mineral spirits, acids, strong alkaline solutions, bleaches, many chemicals, paints, greases and pesticides.

When a hazardous material is purchased from a vendor, the material is to be accompanied by a Materials Safety Data Sheet, referred to as the MSDS. The MSDS provides information on the general properties of the product (ignitability, corrosivity, reactivity, and toxicity), specific disposal information, and any need for personal protection equipment. The MSDS is to be part of the overall safety plan.

The onsite storage and handling of hazardous material is the jurisdiction of the DLI; the disposal of these materials as hazardous waste is the jurisdiction of the DEQ. For more information about the storage, handling and disposal of hazardous material, contact the Department of Labor and Industry at (406) 444-6401 or the Department of Environmental Quality at (406) 444-5300.

Compliance Recommendations

It is recognized that typical exposure of personnel in educational facilities to bloodborne pathogens (HBV and HIV) is limited to few occupational activities, and then likely only as collaterally provided first aid treatment. To assist in the preparation of effective policies for the prevention and control of exposure in such limited situations guidelines are offered through the Montana Department of Labor and Industry, Safety Bureau. (NOTE! School nurses, by virtue of their occupation, are required to have a complete exposure control plan, as required by 29 CFR 1910.1030, the Bloodborne Pathogen Standard for Educational Facilities in Montana, in place covering their work activities.)

Resource Agencies

Montana Department of Labor and Industry
Safety Bureau
PO Box 1728
Helena MT 59624
(406) 444-6401

Montana Department of Environmental Quality
Waste Management Section
1520 East Sixth Avenue
PO Box 200901
Helena MT 59620-0901
(406) 444-5300

Montana School Services Foundation
Worker's Compensation Risk Retention Program
1 South Montana Avenue
PO Box 5388
Helena MT 59604-5388
(406) 442-0275 or 1-800-845-SAVE

Montana School Boards Association Policy Guidelines - 1996

When the Montana legislature adopted the Montana Safety Culture Act, they also adopted the U.S. Occupational and Health Administration Guidelines. The standards for occupational exposure to bloodborne pathogens require employers to show:

- A written infection and control plan,
- A staff training program, with records kept for three years,
- Availability of appropriate protective items such as latex gloves, antiseptic cleaning supplies, and secure waste disposal bags,
- Housekeeping schedules, and
- Procedures for medical follow-up and counseling after a blood exposure incident, with confidential medical records of the incident kept for 30 years.

OSHA regulations also call for employers to identify those who are “reasonably anticipated” to be exposed to blood as part of their job duties. Some schools put nurses, custodians, or coaches in this category; expert guidance must be necessary to decide whom to include. The school district must then offer the designated employees Hepatitis B vaccine and intensive prevention training. An employer must also pay for the medical evaluation of any employee who reports a blood exposure incident to the personnel office within twenty-four hours.

HANDLING AND DISPOSING OF POTENTIALLY INFECTIOUS WASTE MATERIALS

Montana school personnel deal with issues and concerns regarding the proper handling and disposal of potentially infectious waste materials, including those materials used to clean up body fluid and/or blood spills.

The Montana Department of Environmental Quality (DEQ) Waste Management Section has addressed the issue of handling and disposing of potentially hazardous wastes. The Waste Management Section does not believe schools are subject to the requirements of the Montana Infectious Waste Act due to:

1. dispensing health care services (i.e., activities which generate infectious waste) is not a normal school activity; and
2. the quantities of potentially infectious materials generated would be miniscule.

Waste materials produced in a school setting should be handled in the following manners:

- Potentially infectious materials (e.g., vomitus, bloody tissues) can simply be deposited in the school trash collection system. It is recommended to “double-bag” the wastes before disposing. (Note: Using biohazard bags is not recommended for school because regular trash collectors cannot legally dispose of trash labeled as a biohazard.) In an attempt to limit the infection potential of waste materials, school personnel can saturate the bagged materials with at least a 1% bleach solution, though it is not necessary to do so.
- If a school staff member must be involved in the handling and disposal of medical sharps, such as syringes, hypodermic needles, or other potentially infectious objects with are capable of penetrating the skin; these items should be containerized in labeled sharps containers. Procedures for disposing of sharps containers must follow the requirements of the Montana Infectious Waste Management Act.
- Discarded feminine hygiene products are not considered infectious waste and may be disposed of via the regular trash collection system.

For more information on potentially infectious waste materials in school settings, please contact the OPI HIV/AIDS Education Program or the DEQ Waste Management Section.

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INFECTION CONTROL EQUIPMENT

Montana schools bear the responsibility of being prepared to treat school-site injuries and to clean up body spills due to illness or injury. Montana schools should have first-aid kits and body fluid clean-up kits available to school personnel in all environments. The purpose of a first-aid kit is to deliver emergency treatment; the purpose of the body fluid clean-up kit is to clean up body fluid spills that may be created by illness or injury.

RECOMMENDED CONTENTS FOR FIRST-AID KITS

At a minimum, a first-aid kit should include:

- 2 – 1"x 2.5 yards adhesive tape rolls
- 24 sterilized gauze pads 3" x 3"
- 100 – ¾" x 3" adhesive bandages
- 8 – 2" bandage compress
- 10 – 3" bandage compress
- 2 – 2" x 6" sterile gauze roller bandages
- 3 sterile gauze pads 36" x 36"
- 3 sterile eye pads
- 2 non-sterile triangular bandages approximately 40" x 36" x 54" with 2 safety pins
- 1 rounded-end scissors
- 1 pair latex gloves
- 1 mouth-to-mouth airway

Source: The Eleventh National Conference on School Transportation

RECOMMENDED CONTENTS FOR BODY FLUID CLEAN-UP KITS

At a minimum, a body fluid clean-up kit should be able to perform the following steps and contain the following equipment:

- ❖ *Protect the person cleaning the spill.*
 - One pair latex gloves

- ❖ *Stabilize, isolate, and pick up the fluid spill.*
 - Absorbent powder to contain the liquid.
 - Scoop or scraper to pick up the powder gel.

- ❖ *Wipe up any remaining residue on student(s), floor or other surfaces.*
 - Two (2) absorbent disposable towels

- ❖ *Cleanse the person who spilled, the spill area, and the person cleaning the spill.*
 - Three (3) disposable, disinfectant towelettes

- ❖ *Safely dispose of waste and clean-up materials.*
 - Two (2) disposable plastic bags. Use one bag to hold all powder and clean-up materials, including gloves.
 - The additional bag is used for the disposal of wastes including the used disposable bag. This means of double bagging will help ensure that no contamination will be on the exterior of the bag.

Source: Montana Pupil Transportation Advisory Council

PROCEDURES FOR USING KITS

For proper use of the contents in first-aid and clean-up kits and for additional infection control and spill clean-up information, please refer to your local public health agency, the American Red Cross or to documents developed by the Montana Office of Public Instruction including the **Montana Curriculum Planning Guidelines for HIV/AIDS Education (1999)** and **Communicable Diseases Policies and Procedures for Montana Schools (1995)**.

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