



Nanogate North America LLC.

Exposure Control Plan (ECP) for Bloodborne Pathogens (BBP) and Other Potentially Infectious Materials (OPIM)

Purpose

Nanogate North America LLC. Is committed to providing a safe and healthful work environment for all of our employees. 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 plan that assists Jay Industries, Inc. in implementing and ensuring compliance with the standard, thereby protecting our employees. This ECP includes:

- Employee Occupational Exposure Determination and Compliance
- Methods of Implementation and Control
- Determination of employee exposure
- Hepatitis B Vaccine for Employees with Occupational Exposure
- Post-Exposure Evaluation and Follow-up
- Employee Training
- Administrative Duties
- Recordkeeping

Employee Occupational Exposure Determination and Compliance

The majority of Nanogate North America LLC employees are not exposed to bloodborne pathogens, and any exposure would be the result of an on-the-job accident only. The following job classifications may be at risk to occupational exposure:

- Department Managers, Shift Supervisors and Line Leaders who are trained to respond to an injury to administer first aid.
- Maintenance personnel who may work on equipment after a first aid injury.
- Janitorial staff that may be called to clean up after a first aid incident.

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.

Methods of Implementation and Control

Universal Precautions

All employees will use universal precautions. All body fluids shall be considered as potentially infectious materials.

All blood and other potentially infectious materials should be handled with appropriate precautions, such as the use of gloves, masks, gowns and other PPE if blood or OPIM is encountered

Engineering and work practice controls shall be used in order to limit exposure.

Exposure Control Plan

All employees will receive an explanation of this ECP during their Orientation training session. Any employee may review this plan at any time on the internal intranet training page or by contacting the EHS office. An employee may request a paper copy of the ECP from the EHS Department, who will provide one within 15 days of the request.

Engineering and Work Practice Controls

Engineering and work practice controls will be used to prevent or minimize exposure to bloodborne pathogens, including those listed below:

- Sharps disposal containers accessible to employees in each plant location.
- Sharps containers are maintained, replaced, and properly disposed of by the EHS Department, who should be notified if one is full or in need of maintenance.

Additional engineering controls and work practices will be considered during reviews of this plan.

Personal Protective Equipment (PPE)

PPE is provided to our employees at no cost to them. Training is provided on the use of the appropriate PPE for the tasks or procedures employees will perform.

PPE is available in the Blood Borne Pathogens kits that are located by the large First Aid Cabinets. The types of PPE available to employees are as follows:

- Masks, safety glasses, gowns, gloves, shoe covers, cap, biohazard bag, and antimicrobial hand wipes.

All employees using PPE must observe the precaution of disposing of the PPE in the same manner as contaminated items and materials. Please notify the EHS office as soon as possible for PPE refills and the disposal of contaminated items.

Housekeeping

Bloodborne Pathogen or OPIM regulated waste is placed in containers that are closable, constructed to contain all contents and prevent leakage, appropriately labeled or color-coded, and closed prior to removal to prevent spillage or protrusion of contents during handling.

Contaminated sharps are discarded immediately or as soon as possible in containers that are: Closable; puncture-resistant; leak-proof on sides and bottoms; and correctly labeled and color-coded.

Sharps disposal containers should be handled using the same procedures as handling contaminated items and material.

Broken glassware that may be contaminated is to be picked up using mechanical means, such as a brush and dust pan.

The bloodborne pathogen kits that are located by the large First Aid Cabinets, contain the following items to assist with BBP and OPIM clean-up:

- Fluid Solidifier, disinfectant spray, pick up scoop and scraper, paper towels, biohazard bags, antimicrobial hand wipes, gloves, and SDS sheets of contents.

Labels

The International Biohazard symbol, as shown below, is used to label Bloodborne Pathogen Protection & Clean-up kits, disposable bags and sharps containers. Biohazard bags and sharps containers are colored RED, in order to identify them.



Biohazard warning labels and/or red bags must be used as required for regulated waste or contaminated equipment. Employees are to notify the EHS office if they discover regulated waste containers, or contaminated equipment without proper labels.

Hepatitis B Vaccination for Employees with Occupational Exposure

During training, Nanogate North America will provide information on the Hepatitis B Vaccinations, including the safety, benefits, efficacy, methods of administration, availability, and information that the vaccine is available at no charge to the employee.

The majority of Nanogate North America LLC., employees are not exposed to bloodborne pathogens, and any exposure would be the result of an on-the-job accident only. The Hepatitis B vaccination series is available at no cost to employees with potential Occupational Exposure (identified in the exposure area of this plan), after training and within 10 days of initial assignment.

Vaccination is encouraged unless:

1. Documentation exists that the employee has previously received the series,
2. Antibody testing reveals that the employee is immune, or
3. Medical evaluation shows that vaccination is contraindicated.

If an employee chooses to decline vaccination, the employee must sign a Declination Form. Employees who decline may request and obtain the vaccination at a later date. Documentation of refusal of the vaccination is kept in the employee's Medical Record file.

Employees who request the vaccination should contact the HR Manager in their Division. The HR Manager must complete and FAX the Passport Form, filling in Hepatitis B Vaccination in the line of "Additional services requested". A copy of the request and fax will be added to the employee's Medical Record file.

Avita is the provider of the Hepatitis B vaccination for Jay Industries, Inc., and will provide employees who receive the vaccination with medical information about the vaccine, testing and follow-up.

Post-Exposure Evaluation and Follow-Up

Should an exposure incident occur, complete an Accident/Incident Form before the end of the employee's shift and contact the HR Manager in the appropriate division. An immediately available confidential medical evaluation and follow-up will be conducted by Avita or the MEDCENTRAL Emergency Room (after hours).

Following the initial first aid (clean the wound, flush eyes or other mucous membranes, etc.), the Administration of Post-Exposure Evaluation and Follow-up will be performed. If the health care professional evaluating an employee after an exposure incident would like to receive a copy of the plan, they may request it from the EHS Director.

The HR Manager in the appropriate division shall provide the exposed employee with a copy of the evaluating health care professional's written opinion within 15 days after completion of the evaluation.

The EHS office will review the circumstances of all exposure incidents to determine ways to prevent future exposures and the effectiveness of the plan and training.

Employee Training

Upon hire, all employees will receive Bloodborne Pathogens training as part of their Orientation Training.

All employees who have Occupational Exposure to bloodborne pathogens will receive initial and annual training conducted by qualified instructors. The training will include epidemiology, symptoms, and transmission of bloodborne pathogen diseases. In addition, they will be offered the Hepatitis B vaccine.

Employee training records will be maintained by the HR Department in the appropriate division. Training materials are available at the EHS office.

Administrative Duties

The Environmental, Health and Safety (EHS) Director is responsible for the implementation of the Exposure Control Plan (ECP) and will maintain, review, and update the ECP at least annually, and whenever necessary to include new or modified tasks and procedures that affect occupational exposure, to reflect new or revised employee positions with occupational exposure, or to reflect changes in technology that eliminate or reduce exposure to bloodborne pathogens.

The EHS Director and the Human Resources (HR) Manager for the appropriate division, will be responsible for:

- ensuring that all medical actions required are performed;
- ensuring that appropriate employee health and OSHA records are maintained;
- conducting training and properly documenting training;
- making the written ECP available to employees and OSHA representatives.

The EHS office will maintain and provide all necessary personal protective equipment (PPE), engineering controls (e.g., sharps containers), labels, and red biohazard bags as required by the standard and will ensure that adequate supplies of the aforementioned equipment are available in the appropriate sizes.

Recordkeeping

Training Records

Bloodborne Pathogen training records for each employee who completes the training will be maintained by the Human Resources Department in each Division for at least three years, in the Nanogate North America PLEX Training module.

Bloodborne Pathogen Training records will contain:

- The dates of the training sessions;
- The contents or a summary of the training sessions;
- The names and qualifications of the persons conducting the training;
- The names and job titles of all persons attending the training.

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 the HR Manager or EHS Director.

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."

The HR Manager is responsible for maintenance of the required medical records. These confidential records are kept in the Medical File for at least the duration of employment plus 30 years.

Employee medical records are provided upon request of the employee or representative with written consent of the employee within 15 working days. Such requests should be sent to the HR Manager in the appropriate division.

OSHA Recordkeeping

An exposure incident is evaluated to determine if the case meets OSHA's Recordkeeping Requirements (29 CFR 1904). This determination and recordkeeping is completed by the Human Resources, Workers' Compensation Administrator for all divisions.

Exposure Control Plan Review and Revision Log

Action	Authority	Date
New Implemented into policy	Ken Bower	2/13/04
Reviews, updated and corrected typo's	Ken Bower	6/3/04
Reviewed, changed margins.	Ken Bower	12/12/07
Annual update and review	Allen Wheeler	6/15/09
Annual update and review	Allen Wheeler	5/6/10
Annual update and review	Allen Wheeler	7/2/11
Annual update and review	Allen Wheeler	8/7/12
Annual update and review	Allen Wheeler	9/23/13
Revised & rewritten; instructions & forms added.	Marijan Grogza	6/10/15
Workable changed to Avita; HR Director to Manager	Marijan Grogza	11/12/15
Revised to Nanogate North America LLC	Ralph F Hall	04/29/2019

Nanogate North America LLC.
Hepatitis B Vaccination Procedures
for
Employees with Occupational Exposure

1. Employees eligible for the Hepatitis B Vaccination must have “Occupational Exposure” to the virus, as defined in the Exposure Control Plan procedure and Bloodborne Pathogen training.
2. The employee may request a Hepatitis B vaccination within 10 days after they complete their training.
3. Avita is the designated provider of the Hepatitis B vaccination for Nanogate North America LLC.
4. A request for the Hepatitis B vaccination must be FAXED on the Passport Form, by the HR Manager in the appropriate division.
5. If the vaccination is refused by the employee, a Hepatitis B Vaccine Declination form must be completed, signed, and filed with the HR Manager in the appropriate division.
6. However, at a later date after training, if an employee changes their mind and decides to request a Hepatitis

B vaccination, they may do so by contacting their HR Manager.

Nanogate North America/Jay Industries, Inc. Hepatitis B Vaccine Declination Form

I understand that due to my occupational exposure to blood or other potentially 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.

If I decline the Hepatitis B vaccination at this time, I understand that by declining this vaccination, I continue to be at risk of acquiring Hepatitis B, a serious disease.

In the future, if I continue to have occupational exposure to blood and other potentially infectious materials and I would like to be vaccinated with the Hepatitis B vaccine, I can receive the vaccination at no charge to me.

Signed (employee name):_____

Print employee name:_____

Date:_____

This form is to be completed and returned to the Human Resources Department.

Nanogate North America/Jay Industries, Inc. Post-Exposure Evaluation and Follow-up Checklist

The following steps must be taken in case of an employee's exposure to bloodborne pathogens:

Exposed Employee Name: _____

Activity	Date/HR Initials
Accident/Incident form completed by supervisor	_____
Employee furnished with information regarding follow-up	_____
Employee sent to Avita for medical consultation	_____
Employee blood collected and tested by Avita	_____
Avita furnished with employee job description and incident report	_____
Avita furnished with source individual identity	_____
Source individual written medical consent obtained ____ Yes ____ No	_____
Source individual blood collected for testing	_____
Test results given to exposed employee	_____
Written medical opinion given to exposed employee	_____
Other _____	_____
Other _____	_____
Other _____	_____
Other _____	_____
Other _____	_____

Human Resources will file this form in Exposed Employee Medical File.

Reviewed and revised 4/29/2019 Ralph Hall

