Bloodborne Pathogens Exposure Control Plan

Customizable employer template

Designed to help employers organize the written elements required by OSHA 29 CFR 1910.1030. This template must be tailored to the employer's actual workplace, job duties, hazards, controls, procedures, and applicable state requirements.

IMPORTANT

This is a planning template, not a substitute for the OSHA standard or legal advice. The employer is responsible for completing, implementing, reviewing, and updating its Exposure Control Plan.

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1. Employer Information & Plan Administration

Complete this section before putting the plan into use.

Employer / Facility Information

Organization / Facility Name	SAMPLE - Keystone Packaging Solutions, Inc. (Fictional)
Primary Worksite Address	100 Example Industrial Drive
City / State / ZIP	Williamsport, PA 17701
Plan Administrator / Responsible Person	Jordan Miller
Title	Safety & Training Coordinator
Phone	(570) 555-0141
Email	safety@example.com

Date Initially Prepared August 20, 2026 **Current Review Date** August 20, 2027

Plan Administration

The employer will identify who is responsible for implementation of this Exposure Control Plan, make the plan accessible to employees, and review/update it at least annually and whenever changes in tasks, procedures, positions, or technology affect occupational exposure.

Where employees can access this plan:

Printed copy: Safety Office. Electronic copy: company safety drive. Accessible to employees during a

✔ Paper copy available ✔ Electronic copy available ✔ Accessible on all shifts

Responsible persons / roles for implementation:

Safety & Training Coordinator administers the ECP. Department supervisors implement controls. Facili

2. Exposure Determination

Identify employees with reasonably anticipated occupational exposure without regard to PPE use.

How to use this section

List job classifications where all employees have occupational exposure. Then list job classifications where only some employees have occupational exposure, along with the tasks/procedures that create exposure.

A. Job Classifications - All Employees Have Occupational Exposure

Job Classification	Department / Area	Notes
Designated First Aid Responders	All departments	Respond to workplace injuries where contact with blood or OPIM may reasonably occur.
Facilities / Housekeeping Staff	Facilities	May clean blood or OPIM spills and handle contaminated cleanup materials.
Safety & Training Coordinator	Safety	May assist with exposure response, spill control, and first aid.

B. Job Classifications - Some Employees Have Occupational Exposure

Job Classification	Department / Area	Exposure-Related Tasks / Procedures
Production Supervisors	Operations	Only employees formally designated and trained as first aid responders have occupational exposure; o
Maintenance Technicians	Maintenance	Only when assigned to cleanup of equipment or areas visibly contaminated with blood/OPIM after an in

3. Schedule & Method of Implementation

Assign responsibility for each required component of the plan.

Use this page as the employer's implementation map. Enter the responsible person/role, location of procedures or records, and any timing/frequency that applies.

Program Element	Responsible Person / Role	Method, Location, Timing / Notes
Universal precautions	All exposed employees; enforced by supervisors	Treat all human blood and OPIM as infectious regardless of perceived status.
Engineering controls	Safety Coordinator / Facilities Lead	Provide handwashing facilities, leak-resistant cleanup containers, and sharps containers when contam
Work practice controls	Department supervisors	No recapping or handling contaminated sharps by hand; wash hands after glove removal; no food/drink
Personal protective equipment	Facilities Lead / Supervisors	Select PPE based on anticipated exposure. Employer supplies, cleans/replaces, and disposes of requir
Housekeeping / decontamination	Facilities Lead	Written cleaning schedule by area and contamination risk; contaminated surfaces decontaminated promp
Regulated waste / sharps	Facilities Lead	Regulated waste placed in closable, leak-resistant, labeled/color-coded containers and handled accor
Hepatitis B vaccination	HR Manager / Safety Coordinator	Offer Hepatitis B vaccination series and required follow-up to occupationally exposed employees at n
Post-exposure evaluation & follow-up	Safety Coordinator / HR Manager	Immediate confidential medical evaluation and follow-up after a reported exposure incident, at no co
Labels / signs / hazard communication	Facilities Lead	Use biohazard labels or red containers/bags where required for regulated waste and contaminated mate
Employee training	Safety & Training Coordinator	Provide BBP training at initial assignment, at least annually thereafter, and when changes in tasks/
Recordkeeping	HR Manager	Maintain medical records confidentially for employment duration plus 30 years; training records at l
Exposure incident evaluation	Safety Coordinator / HR Manager	Evaluate route of exposure, circumstances, PPE and controls in use, device involved if any, and corr

4. Methods of Compliance

Document how occupational exposure will be eliminated or minimized.

Universal Precautions

✔ Universal precautions are used to prevent contact with blood and other potentially infectious materials (OPIM).

Workplace-specific instructions / exceptions / additional precautions:

All human blood and OPIM are treated as potentially infectious. Employees use barriers and safe prac

Engineering Controls

Controls used in this workplace (check all that apply):

✔ Sharps containers / needleless or safety-engineered devices

✔ Splash guards / barriers

✔ Readily accessible handwashing facilities

✔ Other engineering controls

Leak-resistant spill kits and red biohazard bags are stored in first aid cabinets and the Safety Off

Inspection / maintenance / replacement schedule and responsible person:

Safety Coordinator inspects BBP spill kits quarterly and after use. Handwashing facilities are maint

Work Practice Controls

Describe required practices that reduce exposure (examples: hand hygiene, sharps handling, specimen handling, prohibitions on eating/drinki

Employees wash hands immediately after glove removal; cover cuts before response; use tools/tongs ra

5. Personal Protective Equipment (PPE)

Select PPE based on anticipated exposure and document availability, cleaning, disposal, and replacement.

- ✔ Disposable gloves
- ✔ Utility gloves
- ✔ Gowns / protective clothing
- ✔ Face shields
- ✔ Eye protection
- ✔ Masks / respiratory splash protection
- ✔ Resuscitation barriers
- ✔ Other PPE

Other PPE: Disposable aprons and shoe covers available in spill kits when contamination could reach clothing or

PPE is provided at no cost to employees and in appropriate sizes / accessible locations:

- ✔ Yes
- No / action needed

PPE storage / access locations:

Disposable gloves and CPR barrier devices: first aid cabinets. Spill PPE: marked BBP spill kits in S

Procedures for removal, cleaning/laundering, disposal, repair, and replacement:

Remove PPE before leaving the affected work area. Place disposable contaminated PPE in designated re

Circumstances where PPE selection varies by task or exposure level:

First aid response: gloves minimum, add eye/face/body protection if splashing is anticipated. Spill

6. Housekeeping, Decontamination & Regulated Waste

Document cleaning schedules and handling procedures for contaminated materials.

Written cleaning / decontamination schedule:

Routine: Facilities cleans designated first-aid and common areas daily. After contamination: visible

Approved disinfectants / products and contact-time instructions:

EPA-registered hospital disinfectant labeled effective for bloodborne pathogens; use according to ma

Procedures after blood / OPIM spills or contamination of equipment/surfaces:

Restrict area; don PPE; absorb spill with disposable material; remove visible soil; apply approved d

Contaminated laundry handling / storage / transport (if applicable):

The facility does not routinely launder contaminated textiles. If clothing becomes contaminated, it

Regulated waste / sharps handling, container placement, closure, storage, and disposal:

Facilities Lead closes, labels/color-codes, and removes regulated-waste containers before leakage or

No occupational use of contaminated sharps at this workplace / section marked N/A as appropriate.

7. Hepatitis B Vaccination

Document how eligible employees are offered vaccination and how declinations are handled.

Employer requirement

For employees with occupational exposure, the Hepatitis B vaccination series must be made available after required training and within the timeframe specified by the OSHA standard, at no cost, unless an exception applies. Employees who decline must sign the required declination statement.

Healthcare provider / occupational health provider used:

Occupational health provider selected by employer; contact information maintained by HR.

Process for arranging vaccination / antibody testing when applicable:

After BBP training, HR provides the vaccination offer to each employee with occupational exposure wi

- ✔ Vaccination is offered after employees receive the required BBP training.
- ✔ Vaccination is offered at no cost to eligible employees.
- ✔ Signed declination statements are maintained when an eligible employee declines.
- ✔ Employees who initially decline are informed they may later accept vaccination while still occupationally exposed.

Records / declination storage location and responsible role:

/Yes

Workplace-specific notes / exceptions:

Offer Hepatitis B vaccination series and required follow-up to occupationally exposed employees at n

8. Exposure Incident Response & Post-Exposure Follow-Up

Define immediate actions and confidential medical follow-up procedures before an incident occurs.

Immediate Employee Actions

Workplace-specific immediate response instructions:

Wash needlesticks/cuts with soap and water; flush splashes to nose/mouth with water; irrigate eyes w

Who employees must notify / how to report:

Safety & Training Coordinator, then HR Manager. If unavailable, notify the on-duty shift supervisor.

Emergency / after-hours contact process:

Contact on-duty shift supervisor, who initiates the after-hours occupational health/urgent care proc

Post-Exposure Evaluation & Follow-Up

Designated medical provider / facility:

Employer-designated occupational health clinic or appropriate emergency/urgent care provider, depend

Procedure for source individual identification/testing, exposed employee testing, counseling, prophylaxis, and provider documentation as appl

Document route and circumstances; identify/document source individual when feasible and permitted; o

- ✔ Post-exposure evaluation and follow-up are provided confidentially and at no cost to the employee.
- The healthcare professional receives the information required by the OSHA standard.
- ✔ The employee receives the healthcare professional's written opinion within the required timeframe.

9. Communication of Hazards & Employee Training

Document labels/signs and annual employee training.

Labels, Signs & Containers

- ✔ Biohazard labels or red bags/containers are used where required.
- ✔ Specimen / regulated waste / contaminated equipment labeling procedures are defined as applicable.

Locations / items requiring labels or signs and responsible role:

Regulated waste and contaminated containers use fluorescent orange/orange-red biohazard labels or re

Employee Training

- ✔ Training is provided at initial assignment to tasks with occupational exposure.
- ✔ Training is provided at least annually thereafter.
- ✔ Additional training is provided when changes in tasks/procedures affect occupational exposure.

Training provider / responsible person: Qualified BBP instructor or employer-designated competent trainer familiar with 29 CFF

Training format / method / language considerations:

Interactive instructor-led or live/approved interactive training with opportunity for questions. Sit

Where training records are stored:

HR training records system and Safety shared drive.

Any workplace-specific topics or procedures added to annual training:

Training covers the OSHA standard, epidemiology/symptoms, transmission, ECP access, exposure recogni

10. Recordkeeping

Identify how required records are created, maintained, and protected.

Record categories

The OSHA standard includes requirements for medical records and training records. A sharps injury log is also required for covered employers when contaminated sharps injuries occur, with privacy protections and other conditions specified by the standard.

Record Type	Location / System / Custodian	Retention / Privacy / Access Notes
Employee medical records	Employee medical records	HR secure confidential file; employment duration + 30 years.
Training records	BBP training records	HR training system; at least 3 years from training date.
Sharps injury log	Exposure incident reports	HR confidential medical/exposure records, access restricted.
Exposure incident documentation	Sharps injury log	Safety Office/HR; maintained if a contaminated-sharps injury occurs and log is required.
Vaccination / declination documentation	Annual ECP reviews	Safety shared drive; retained with current and prior plan revisions.
Annual ECP review documentation	Safer-device/employee input documentation	Safety shared drive; documented annually as applicable.

Person / role responsible for ensuring records are maintained and available as required:

HR Manager maintains confidential medical records. Safety Coordinator maintains training, plan revie

11. Annual Review, Safer Devices & Employee Input

Use this worksheet at least annually and whenever workplace changes affect occupational exposure.

Review date: August 20, 2026 **Reviewer(s):** Jordan Miller, Safety Coordinator; Alex Rivera, Facilities Le

Reviewed new or modified tasks/procedures affecting occupational exposure.

Reviewed new/revised employee positions with occupational exposure.

Reviewed changes in technology that may eliminate or reduce exposure.

Considered appropriate commercially available and effective safer medical devices, where applicable.

Solicited input from appropriate non-managerial employees where required.

Changes identified and actions taken:

Added a second spill kit near warehouse operations, standardized glove-size inventory, and clarified

Safer-device evaluation / devices considered / reasons for selection or non-selection (N/A if not applicable):

Annual review documented. Safer sharps devices are not routinely applicable because the facility doe

Non-managerial employee input - names/roles, method of solicitation, and feedback (N/A if requirement does not apply):

Taylor Smith (non-managerial first aid responder) reviewed emergency response controls and recommend

Next scheduled review date: August 20, 2027, or sooner if tasks, pı

12. Exposure Incident Evaluation Form

Complete after an occupational exposure incident to evaluate the circumstances and preventive actions.

Employee name / ID: SAMPLE FORM - COMPLETE ONLY AFTER **Date / time:**

Job classification: **Department / area:**

Location of incident:

Task / procedure being performed:

Route of exposure and circumstances (needlestick, splash, cut, mucous membrane, non-intact skin, etc.):

Engineering controls / PPE in use and whether they functioned as intended:

If a sharp was involved, identify device type/brand and how/when the incident occurred:

Immediate actions and medical follow-up initiated:

Root causes / contributing factors and corrective actions to prevent recurrence:

13. Approval, Revision History & Reference Notes

Keep this page with the current plan and document each formal review or revision.

Employer approval / authorized representative:

Name / Title Jordan Miller, Safety & Training Coordinator (Sample) **Date** August 20, 2026

Signature (print and sign after completing the plan):

Revision History

Date	Reviewed / Revised By	Summary of Changes
08/20/2026	Jordan Miller	Initial sample plan prepared; annual review completed; warehouse spill kit location added.

Reference Notes

Primary federal reference: OSHA 29 CFR 1910.1030, Bloodborne Pathogens. OSHA also publishes a Model Exposure Control Plan for employer use. Employers should review the full standard and any applicable state-plan, industry-specific, or healthcare requirements before implementation.

OSHA standard: www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.1030

OSHA model plan: www.osha.gov/bloodborne-pathogens/resources

Template notice:

CPR Safety 411 provides training and educational resources. This template is intended to help organize an employer-specific plan and does not by itself establish compliance. Employers must ensure the final plan accurately reflects their workplace and is implemented in practice.