



PATHOGEN SAFETY DATA GUIDE TRAINING MODULE CASE STUDY 2

POTENTIAL EBOLA VIRUS EXPOSURE TO NON-HOSPITAL ENVIRONMENTAL SERVICE WORKERS

TARGET AUDIENCE: Environmental Service Workers

How to use this case study

This case study is designed to be used as supplementary or as an alternative to Activities 3 and 4 in the NIEHS WTP's Pathogen Safety Data Guide Training Module.

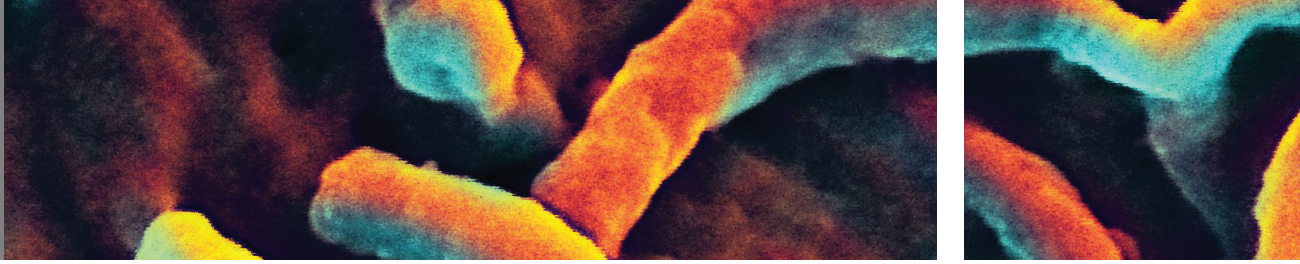
Participants should work in small groups (4 – 8 people). Each group should select a recorder and reporter who will report back to entire class. Each small group should read through the case study. If time allows, the group should answer the questions in Activities 3 and 4 on the PSD Training Module Worksheet for the pathogen Ebola Virus. Then the group should work on the questions following the case study. If time is short, the questions may be divided among the group members or one or both activities may be omitted.

Case Study

In December of 2014, the Occupational Safety & Health Administration (OSHA) issued a citation and notification of penalty after conducting an inspection in response to a complaint from an environmental services worker who was assigned by his employer to work activities including cleaning and disinfecting surfaces and objects potentially contaminated with bloodborne pathogens, including the Ebola Virus.

In this case, environmental service workers were assigned to clean and decontaminate the apartment of the first Ebola patient in New York City. The firm described itself as a Crime Scene Clean-up and Blood Clean-up company. The OSHA violations included:

- 1) The OSHA Personal Protective Equipment (PPE) Standard 29 CFR 1910.132. The employer did not verify that the required workplace hazard assessment had been performed to select the proper PPE for this job.
- 2) The OSHA Respiratory Protection Standard 29 CFR 1910.134. The employer did not provide training for employees who were assigned to wear a full face negative pressure respirator during the cleanup and decontamination of the apartment. Additionally, the employer failed



to evaluate the workplace to ensure that the type of respirator used was effective for the type of contaminants anticipated at the worksite. The employer also failed to provide workers with a medical evaluation and a fit test before assigning them to use a respirator.

- 3) The OSHA Bloodborne Pathogens Standard 29 CFR 1910.1030. The employer failed to provide hepatitis B vaccinations to employees potentially exposed to blood and other potentially infectious material. Additionally, the employer failed to develop the required written exposure control plan and related training.
- 4) The OSHA Hazardous Waste Operations and Emergency Response Standard 29 CFR 1910.120. The employer did not provide the workers who did the clean-up and decontamination with the required training and medical surveillance.

These violations were classified as serious and willful. Serious indicates that the violation could potentially result in death or serious physical harm to exposed workers. Willful is when the employer either knowingly failed to comply with a legal requirement or acted with plain indifference to employee safety. The total proposed penalties were \$78,400.

Proceed to answering the questions in Activities 3 and 4 on the PSD Worksheet if time allows. Then answer the following questions?

1. Given a potential for exposure to Ebola Virus by environmental service workers what type of precautions should be implemented? Check all that apply:

- Contact Droplet Airborne Aerosol transmissible

Explain

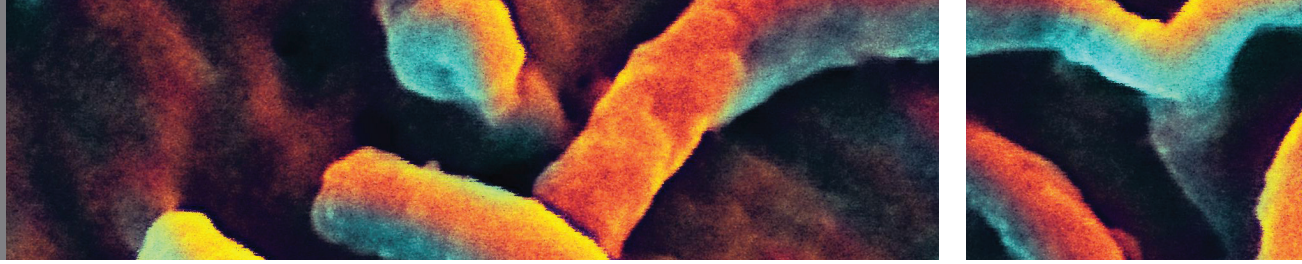
2. Based on the potential exposure routes identified in 2. above, what type of protective controls measures should be implemented:

Engineering controls _____

Administrative controls _____

Personal protective equipment _____

Respiratory protection _____



3. *What steps should be taken to prepare for this type of event? Check all that apply:*

- Written procedures
- Selection and purchase of PPE and respiratory equipment
- Worker training
- Equipping vehicles
- Decontamination procedures
- Post exposure procedures
- Other? _____

4. *In planning a clean-up involving Ebola Virus which OSHA standards apply? _____.*

5. *Based on what you learned in this case study, are there potential improvements that should be made at your place of employment?* Yes No

If yes, please explain and list any potential action steps:

References:

- 1) OSHA Violation Detail https://www.osha.gov/pls/imis/establishment.inspection_detail?id=1011654.015

Supplemental Reading Material:

- 1) CDC Ebola Website <https://www.cdc.gov/vhf/ebola/>
- 2) CDC, Interim Guidance for Environmental Infection Control in Hospitals for Ebola Virus, <http://www.cdc.gov/vhf/ebola/healthcare-us/cleaning/hospitals.html>
- 3) OSHA standards: <https://www.osha.gov/law-regs.html>