California Aerosol Transmissible Disease Standard (ATD) for CTCA

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Biosafety Officer & Select Agent Officer
Microbial Diseases Laboratory
Viral and Rickettsial Diseases Laboratory
Why do we need to comply with the ATD standard?

- It’s the law
- Title 8 CCR Section 5199
- Aerosol Transmissible Diseases
  - Aerosol and droplet hazards
  - Inhalation

- ATD Zoonotic Standard 5199.1 (a)(1)(A)(7) Laboratory operations involving samples, cultures, or other materials potentially containing zoonotic aerosol transmissible pathogens (zoonotic ATPs)
Aerosols & Droplets

- Fine mists of particles of up to 5 µm
- May require up to 1 hour or longer to settle
- Procedures that impart energy to a microbial suspension produce aerosols
- Ubiquitous in laboratory procedures
- Often undetected
- Extremely pervasive, putting all at risk, or exposing staff to hazardous conditions
- Splashes can cause airborne droplets which settle faster
- Aerosols and droplets, contain suspensions of pathogens, may not be seen or smelled, but can be inhaled

Slide by Michael Pentella, PhD   (University of Iowa Hygienic Laboratory)
Requirements for Laboratories
Section (f)

- Identification of Biosafety Officer
- Risk Assessment in accordance with Section II of BMBL
- Implement feasible engineering and work practice controls in accordance with the risk assessment
- Develop a list of job classification, tasks, and procedures where employee might be exposed
- List of ATP-L that are present in the lab
- Safe handling procedures
- Engineering Controls (biosafety cabinets)
- PPE
- Decontamination of surfaces and equipment
- All incoming materials containing ATPs-L be treated as containing the virulent pathogen
- Inspection of labs and biosafety procedures annually
- Emergency procedures for uncontrolled releases
- Procedures for medical services including (IZ, PPD, Tx)
- Procedure for review of biosafety plan
Requirements for Referring Employers

“Designate a person responsible for the establishment, maintenance, and implementation of infection control procedures” (i.e. decon, source control, notifications)

Question: If a clinical laboratory sends their employee to pick up specimens from drawing stations located throughout Berkeley are they considered a referring employer?
Referring Employers

What is a referring employer?

Examples of a referring employer
- FDL field samplers during the spinach outbreak (sender)
- After 2001 Anthrax mailings expert scientist were sent to the field for sampling instruction (sender)

Question: A vendor services your biosafety cabinets (BSC’s) where ATDs-L are manipulated. Are you considered a referring employer? (recipient)
Biosafety Officer & Biosafety Manual

- Biosafety Officer
- Biosafety Manual
- Biosafety Manual or Exposure Control Plan in hospital settings where there is direct patient contact
- Reviewed and revised annually
List of Bacterial Agents

See Appendix D

- All Select Agents!
- Bordetella pertussis
- Chlamydia pneumoniae
- Chlamydia psittaci
- Chlamydia trachomatis
- Clostridium botulinum
- Corynebacterium diphtheriae
- Haemophilus influenzae, type B
- Helicobacter pylori
- Legionella pneumophilia
- Neisseria gonorrhoeae
- Neisseria meningitidis
- Salmonella spp.
- Salmonella typhi
- Shigella
- Streptococcus spp. group A
- Novel or unknown pathogens
- Pathogens designated by the safety officer
List of Mycobacterium & Fungal Agents

See Appendix D
- All Select Agents!
- Blastomyces dermatitidis
- Coccidioides immitis and posadasii
- Histoplasma capsulatum
- Mycobacterium tuberculosis
- Mycobacteria spp.
- Novel and unknown pathogens
- Pathogens designated by the safety officer
List of Viral Agents

See Appendix D

- All Select Agents!
- Adenovirus
- Arboviruses
- Arenaviruses
- Chapare Virus
- Cytomegalovirus, human
- Dengue
- Epstein-Barr Virus
- Hantaviruses
- Hepatitis B, C, D
- Herpesvirus simiae (B)
- Influenza, con-contemporary human (H2N2), 1918 strain, H5N1
- Lymphocytic choriomeningitis virus
- Measles
- Mumps
- Parvovirus B19
- Rabies
- Retroviruses
- Rubella
- SARS Co-V
- Venezuelan Encephalitis
- Western Encephalitis
- West Nile
- Yellow Fever
- Novel or unknown pathogens
- Pathogens designated by safety officer
Other Agents

Appendix D

- All Select Agents!
- Mycoplasma
- Prions
- Rickettsia
- Novel or unknown pathogens
- Pathogens designated by the safety officer
Commonly Acquired Lab Infections

- Brucella spp.
- C. burnetii
- C. immitis
- C. posadasii
- F. Tularensis
- M. Tuberculosis
- N. meningitidis
- R. prowazekii
- S. Typhi


TABLE 1. Most frequently reported laboratory-acquired infections in the United States and Great Britain

<table>
<thead>
<tr>
<th>Infection</th>
<th>Total no. (%) of cases reported for:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>U.S. (^a)</td>
</tr>
<tr>
<td>Brucellosis</td>
<td>274 (9.4)</td>
</tr>
<tr>
<td>Q fever</td>
<td>184 (6.3)</td>
</tr>
<tr>
<td>Typhoid fever</td>
<td>292 (10.0)</td>
</tr>
<tr>
<td>Hepatitis</td>
<td>126 (4.3)</td>
</tr>
<tr>
<td>Tularemia</td>
<td>129 (4.4)</td>
</tr>
<tr>
<td>Tuberculosis</td>
<td>174 (6.0)</td>
</tr>
<tr>
<td>Dermatomycosis</td>
<td>84 (2.9)</td>
</tr>
<tr>
<td>Venezuelan equine</td>
<td>118 (4.1)</td>
</tr>
<tr>
<td>encephalitis</td>
<td>0</td>
</tr>
<tr>
<td>Typhus</td>
<td>82 (2.8)</td>
</tr>
<tr>
<td>Psittacosis</td>
<td>70 (2.4)</td>
</tr>
<tr>
<td>Coccidioidomycosis</td>
<td>108 (3.7)</td>
</tr>
<tr>
<td>Streptococcal infections</td>
<td>67 (2.3)</td>
</tr>
<tr>
<td>Histoplasmosis</td>
<td>81 (2.8)</td>
</tr>
<tr>
<td>Leptospirosis</td>
<td>43 (1.5)</td>
</tr>
<tr>
<td>Salmonellosis</td>
<td>54 (1.9)</td>
</tr>
<tr>
<td>Shigellosis</td>
<td>54 (1.9)</td>
</tr>
</tbody>
</table>

All reported infections 2,912 3,921 95 34

\(^a\) 1969 data adapted from reference 151.
\(^b\) 1976 data adapted from reference 110.
\(^c\) 1980 to 1989 data adapted from references 51 through 55.
\(^d\) Includes possibly attributable and attributable cases.
\(^e\) NADC, National Animal Disease Center; 1975 to 1985 data adapted from reference 93.
Brucellosis
(B. abortus, canis, maris, melitensis, suis)

Infectious dose: very low, ~10+ organisms
Symptoms: mild flu like, undulating fever (can be high), aches
Transmission: Can be transmitted by infectious aerosols, consuming unpasteurized dairy products, lab & veterinary occupational exposures
Incubation period: 5-60 days (can be months)
Lab acquisition: generally by transmitted by aerosolization
Source specimens: cultures, blood, tissues, placentas, fetuses, urine, and difficult to isolate from food sources (dairy)
Reference: Control of Communicable Diseases Manual
http://www.cdc.gov/mmwr/preview/mmwrhtml/mm5702a3.htm
Brucella Disinfection

- Sodium hypochlorite, aldehydes, and phenolics
- Sterilization by autoclaving
Hospital performs gram stain, blood tube inoculation, and basic biochemical tests on the open bench
- Brucella spp. misidentified as Haemophilus
- Specimen run on the multiplex
- Confirmatory genus ID occurs at local LRN lab
- State lab receives a lysate to speciate the specimen as melitensis, abortus, suis
Case Study Brucellosis: 2001 & 2002

Diagnostic Lab 1
- Nov. 2001, New York
- 57 year old female clinical lab worker
- Malaise, vomiting, headache, and fever
- 5 weeks after symptoms gram-variable
- Infection resulted from clinical sample processed on open bench in BSL-2 lab without proper precautions

Case Study Brucellosis: 2001 & 2002

**Diagnostic Lab 2**
- 48 year old female laboratory worker
- High fever, chills, drenching sweats, and weight loss
- Clinical sample from lab worker from (Dx Lab #1) was subcultured in BSC, but biochemical tests done on open bench (catalase)
- Technician contracted *B. melitensis*

Tuberculosis

(Mycobacterium africanum, bovis, canettii, fortuitum, kansasii, microti, tuberculosis, xenopi)

**Infectious dose:** 1-10 organisms, no safe level of exposure

**Symptoms:** coughing, exporating sputum or blood, dyspnea

**Transmission:** Transmitted by infectious aerosols, can remain communicable for 4 weeks to 6 months post tx, extra pulmonary infections

**Incubation period:** 2-10 weeks to 1yr, latent TB

**Lab acquisition:** generally by transmitted by aerosolization, respiratory droplets

**Source specimens:** sputum, cultures, BAL, tracheal washes, tissues, unpasteurized milk, infected animal carcasses

**Immunization:** BCG, questionable efficacy

**Reference:** Control of Communicable Diseases Manual

Sewell, PhD. Clinical Microbiology Newsletter *Volume 28, Issue 1*, Pages 1-6 (1 January 2006)
TB Disinfection

- Alcohols
- Aldehydes
- Chlorine compounds
  - Sodium hypochlorite
- Phenolics
- Quarternary ammonium
- VHP
- Sterilization by autoclave

- Ineffective
- Effective
- Ineffective
- Effective
- Ineffective
- Effective on Surfaces
- Effective
Generation of Droplets & Droplet Nuclei during *M. tuberculosis* (TB) procedures

- Pouring liquid cultures and supernatant fluids
- Using fixed-volume automatic pipetters
- Mixing liquid cultures with a pipette
- Preparing specimen and culture smears
- Dropping tubes or flasks containing cultures
- Risk to laboratorians who process specimens in microbiology and histology labs

Lowenstein-Jensen Media
Neisseria meningitidis
(meningococcal disease)

**Infectious dose:** not available  
**Symptoms:** fever, headaches, rash, stiff neck, light sensitivity  
**Transmission:** direct contact, respiratory droplets, sharing beverages  
**Incubation period:** 2-10 days, commonly 3-4 days  
**Lab acquisition:** droplet, aerosol, mucous membranes  
**Source specimens:** pharyngeal exudates, CSF, blood, saliva  
**Immunizations:** available  
**Containment:** BSL2+  
**Inactivated by:** sodium hypochlorite, aldehydes, phenolics, autoclaving  
**Reference:**  
MMWR Article Sept. 2005  
MMWR Feb. 22, 2002/51(07);141-4  
Control of Communicable Diseases Manual
Case Report 1: Lab Acquired Meningitis

- July 15, 2000, Alabama
- 35 year old female microbiologist
- Seen at the hospital emergency with generalized malaise, fever, and diffuse myalgias

- July 16 patient returned to hospital A, became tachycardic and hypotensive, and died 3 hours later. Blood cultures were positive for *N. meningitidis* serogroup C

- Source specimen: Gram's stain from the blood culture of a patient who was subsequently shown to have meningococcal disease. The microbiologist had also subcultured agar plates containing cerebrospinal fluid (CSF) cultures of *N. meningitidis* serogroup C from the same patient

- Co-workers reported that in the laboratory, aspiration of materials from blood culture bottles was performed at the open laboratory bench; biosafety cabinets, eye protection, or masks were not used routinely for this procedure. Results of pulsed-field gel electrophoresis (PFGE)

Source: MMWR February 22, 2002 / 51(07);141-4
Case Report 2: Lab Acquired Meningitis

- December 24, 2000, Michigan
- 52 yr old microbiologist
- Acute onset of sore throat, vomiting, headache, and fever by December 25th, the patient had developed a petechial rash on both legs
- Patient presented to the emergency department of hospital B and died later that day of overwhelming sepsis
- Blood cultures were positive for *N. meningitidis* serogroup C

The patient was a micro-biologist in the state public health laboratory and had worked on several *N. meningitidis* serogroup C isolates during the 2 weeks before becoming ill

Co-workers reported that the patient had performed slide agglutination testing and recorded colonial morphology using typical biosafety level 2 (BSL 2) precautions; this did not entail the use of a biosafety cabinet.

Source: MMWR February 22, 2002 / 51(07);141-4
High Risk *N. meningitidis*
Testing Procedures

- Streaking for isolation
- Gram stain preparation
- Serogrouping
- Biochemicals such as rapid fermentation
- Carbohydrate testing
- ONPG
- Creation of a solution for DNA extraction
CCR 5199 f (4)(E) Engineering Controls

- “Identify and describe the use of engineering controls, including containment equipment, and procedures”

- Types of engineering controls
  - BSC’s, centrifuge rotors/cups, specimen transport carriers, pipette tips
Recommendations for working in the BSC

- Do not block front or rear grilles
- The sash must be adjusted to the appropriate level
- Check and record your airflow gauge reading to verify proper airflows before using the BSC
- The BSC should only contain those items needed to perform the specific function. Upon completion all items should be decontaminated and removed
- Work should be conducted 4-6 inches inside the BSC.
- Minimize traffic flow past the BSC when in use.
- If disruption of the airflow occurs during work, safely secure your work make sure you let it run for at least 15 minutes before you begin to purge the system of settled dust etc.
- Do not use volatile chemicals in recirculating BSCs. Be aware some chemicals may damage the HEPA filtration system. Use a fume hood for volatile chemicals.
What not to do

Photos by Michael Pentella, PhD
What to do

Photo by Michael Pentella, PhD
“Establish safe handling and prohibitive practices, such as sniffing in vitro cultures, that may increase employee exposure to infectious agents”

Performing high hazard procedures when possible in the hood and inactivating the organism before working on the bench top

Adherence to proper technique
What are considered high hazard (aerosol generating) procedures?

- Catalase
- Pipetting (vigorous mixing)
- Mixing
- Centrifugation
- Inoculating biochemicals or blood culture bottles
- Vortexing
- Pouring off specimens
- Loading syringes
- Flaming loops
- Open bench subculturing
- Hot loop into broth or media
- Lasers, cell sorters
- Grinding Splashes
- Opening lyophilized cultures
- Entering or opening vessels at non-ambient pressures, fermenters, freezer vials
- Bone saw at autopsy
- Homogenizing
- Sonication
- Flow cytometry
Techniques to minimize aerosols

**Don’t’s**
- Use Bunsen burners when you have alternatives
- Pop open the stoppers of blood collection containers.
- Blow out last drop in pipette
- Mix by suction + expulsion
- Open centrifuge immediately after breakage of a specimen
- Operate the cryostat to cut tissue without closing window

**Do’s**
- Discharge liquid down side of container
- Deliver as close as possible to contents
- Use capped tubes when mixing or vortexing
- Use care with needles (gauze pad with alcohol on septum of blood culture bottle)
- Use pipette aids with filters
- Change procedures

Slide by Michael Pentella, PhD (University of Iowa Hygienic Laboratory)
How to minimize aerosols while working with centrifuges

- Transfer liquids with automatic pipette
- Work over absorbent
- Use centrifuge safety cups
- Use sealed rotors
- Use centrifuge in BSC
- Wait until your rotor has stopped spinning
CCR 5199 f (4)(F) Decon

“Establish effective decontamination and disinfection procedures”

- Decontaminate work surfaces before and after you complete your work
- Decontaminate the BSC before and after working
- Appropriate disinfectant concentration for the appropriate contact time
- Autoclave infectious material daily
CCR 5199 f (4)(H & I) PPE

- “Identify and describe the appropriate PPE to be used to minimize exposure”

- “Identify any operations where respiratory protection is required”
“Establish emergency procedures for uncontrolled releases with in the laboratory facility and untreated releases outside the laboratory facility” “These procedures shall include effective means for reporting to the local health officer”

Spill Procedures
- Wear PPE to clean up
- Cover the spill
- Saturate with disinfectant for the appropriate contact time
- Disinfect floors and countertops
- Autoclave material
BSL-3 Major Spill Clean Up

- Evacuate immediately
- Do not reenter for at least 2-4 hours
- Decontaminate with vaporized hydrogen peroxide, chlorine dioxide, formaldehyde gas or other agent
- Re-enter using appropriate protection
ATD Emergencies: Analyzing the H1N1 Experience

- Biosafety Officer
- Risk Assessment Process
- Guidelines and Training
- Mechanism for Addressing Employee Concerns
- Referring Employer Requirements
- Documenting Exposures
- Immunizations (Unavailable)
H1N1 Risk Assessment Questions

- How do employees bring up existing risk assessment(s) for review?
- How does an employee initiate a new risk assessment?
- What is the organizational chain of command? (reporting structure)
- What is the best way to communicate changes to employees real-time?
- How does an employee receive an evaluation of their work station during an emergency?
- Is there a required response time for addressing employee concerns?
- How to you document the risk assessment and who signs off on it?
- What constitutes an exposure? Do employees know the difference between occupational exposures and exposure incidents?
- How can we reduce employee stress? (constant demanding workload)
H1N1 The Solution: Process Evaluation

- Each step of the testing algorithm was mapped and reviewed
- Recommendations were made by supervisors to streamline the process to reduce potential accident or injury
- Employee’s role, experience, and training level were scrutinized
- Engineering controls were inspected, manipulations reviewed, and supervisors were assigned
- Problem areas were identified (specimen processing) and training was conducted
- Spill & leaky specimen procedures were updated
- New risk assessment process was instituted
- PAPR’s were procured
- “Occupational exposures” were not “exposure incidents”
“Include medical services from subsection (h)”

- Immunizations (10 days, declinations)
- Vaccines as recommended by the BMBL 5th Edition
- Examinations
- PPD’s (annually)
- Exposure Incidents
- Treatment
- Emergencies
“Include an effective procedures for the communication of hazards and employee training that complies with subsection (i). This shall include training in the employer’s Biosafety Plan and emergency procedures.

- Proper and Safe Handling Practices
- Use of the BSC
- Biohazardous waste handling
- Use of autoclave
- Disease symptoms
- Post exposure management
- Reporting exposures and illnesses
“Include an effective procedure for obtaining the active involvement of employees in reviewing and updating the Biosafety Plan with respect to the procedures performed by employees in their respective work areas or department on an annual basis”

- Develop a policy or SOP
- Document your review and revisions
Include procedures for the biological safety officer(s) to review plans for the facility design and construction that will affect the control measures for ATPs-L.
“Include procedures for inspection of laboratory facilities, including an audit of biosafety procedures. These inspections shall be performed at least annually. Hazards found during the inspection, and actions taken to correct hazards, shall be recorded.”

- Develop an inspection procedure or SOP
- Document your inspections including corrective actions
CCR 5199 (g) Respiratory Protection

- Medical Evaluation
- Annual Training
- Fit Testing-Quantitative or Qualitative
- Respiratory Protection Plan
“Employers shall ensure that all employees with an occupational exposure participate in the training program”

Training provided at time of initial assignment and annually thereafter

Updates provided when new engineering devices, work practice controls, or when tasks or procedures are modified
Required Training Elements

- Accessibility to the written standard
- General Explanation of ATD’s
- Modes of Transmission
- Exposure Control/Biosafety Plan
- Explanation of appropriate methods of recognizing tasks
- Explanation of mechanisms to reduce ATD’s
- Information on selection, decontamination, handling or PPE
- Description of TB surveillance procedures
- Respiratory Protection Training Requirements
- Information on Vaccines
- Exposure incident procedure
- Information on the employers surge plan
Section (j) Recordkeeping

(1) Medical Records (A)" The employer shall establish and maintain an accurate medical record for each employee with occupational exposure, in accordance with Section 3204”

Record shall include
- Employee’s name
- Vaccination status
- Copy of signed declination forms (exception current seasonal flu)
- Copy of written opinions from PLHCP
- Copy of the exposure incident report supplied to PLHCP
Retention of medical record for employment period plus 30 yrs

- “Must be supplied to employees upon request to the subject employee, anyone having the written consent of the subject employee, the local health officer, and to the Chief and NIOSH in accordance with Section 3204”
Confidentiality “The employer shall ensure that all employee medical records required by this section are:

1. Kept confidential

2. Information should not be disclosed or reported without the employee’s express written consent to any person within or outside the workplace except as permitted by this section or as may be required by law.
Recordkeeping

- **Training records**
  - Date
  - Content or summary of material covered
  - Names and qualifications of person conducting the training
  - Names and job titles of all attendees
  - Record must be retained for 3 years
Recordkeeping

- **Plan implementation records**
  - Dates of review
  - Person conducting the review
    - Safety officer performs review annually
  - Name and work areas of employees involved and summary of conclusions
  - Record must be retained for 3 years
Recordkeeping

- **Exposure records**
  - Date of exposure incident
  - Names of those exposed
  - Disease pathogen
  - Name and job title of person performing the evaluation
  - Identity of any local health officer and/or PLHCP consulted
  - Date of evaluation
  - Date of contact and contact information who other employers who either notified the employer or was notified by the employer
Documenting Exposures

- Develop a mechanism to document exposures
- Develop a procedure for updating exposure incident forms if a person becomes ill
- How do you distinguish between community acquired vs lab acquired illness?
- Occupational Exposure vs Exposure Incident

Questions: Was it associated with an exposure incident? Did you review the occupational exposure risk? Did you update the exposure incident form when the person became ill?
Recordkeeping- Unavailable Vaccines

Vaccine Unavailability
- Every 60 days
- Name of person who determined vaccine was not available
- Date of contact
- Record must be retained for 3 years

Recommendations
- Immunization Schedule
- Declinations
  - legal declinations
- Unavailable Vaccines
  - develop a communication log
Recordkeeping (facility staff)

- Records of inspection, testing, and maintenance of non-disposable engineering controls including ventilation and other air handling systems, air filtration systems, containment equipment, biological safety cabinets, and waste treatment systems shall be maintained for a minimum of five years and shall include

  - Name and affiliation of person performing the test, inspection, or maintenance, date, significant findings, and actions taken
Recordkeeping

- **Respiratory Protection Screening**
  - Record must be retained for 2 yrs.
  - Includes initial respirator medical evaluation and any subsequent respiratory clearance records
  - Annual fit test records
Any Questions?

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ATD Standard
http://www.dir.ca.gov/oshsb/atdapprvdtxt.pdf
http://www.dir.ca.gov/Title8/5199.html

Zoonoses Standard
http://www.dir.ca.gov/oshsb/zoonoticsapprvdtxt.pdf