

U.S. Department of Labor

Occupational Safety and Health Administration
Washington, D.C. 20210



August 7, 1992

Mr. Kevin A. Kruse
Director of Loss Prevention
The Ritz-Carlton
600 Stockton at California Street
San Francisco, California 94108

Dear Mr. Kruse:

This is in response to your letter of June 22, in which you requested an interpretation of the Occupational Safety and Health Administration (OSHA) regulation 29 CFR 1910.1030, "Occupational Exposure to Bloodborne Pathogens." Specifically, you asked about the coverage of housekeepers and laundry attendants in a hotel environment.

While housekeeping staff and laundry attendants in non-health care facilities may not be generally considered to have occupational exposure, it is the employer's responsibility to determine which job classifications or specific tasks and procedures involve occupational exposure. Occupational exposure is defined as "reasonably anticipated skin, eye, mucous membrane, or parenteral contact with blood or other potentially infectious materials (OPIM) that may result from the performance of an employee's duties." Employers in the hotel industry must, then, take into account all circumstances of potential exposure and determine which, if any employees may come into contact with blood or OPIM during the normal handling of laundry in their facility from initial pick-up through laundering.

Employees who do not have occupational exposure as defined above are not covered by the scope of this standard. For example, an employee who handles linens soiled with feces, nasal secretions, sputum, sweat, tears, urine, vomit, or saliva (other than saliva from dental procedures) would not be occupationally exposed during that task as these substances are not "other potentially infectious materials" as defined in the standard, unless they are contaminated with visible blood.

On the other hand, employees that handle, for example, linens soiled with urine that did contain visible blood would be occupationally exposed. An employer may designate specific employees to perform the tasks and procedures, if any, that involve occupational exposure and train other employees to defer such tasks to employees designated to perform them.

For compliance purposes, if OSHA determines, on a case-by-case basis, that sufficient evidence exists of reasonably anticipated exposure, the employer will be held responsible for providing the protections of 29 CFR 1910.1030 to the employees with occupational exposure.

Please bear in mind that employers in the state of California are regulated by the California Department of Industrial Relations whose occupational safety and health program may have requirements that are more stringent than those of Federal OSHA. Should you wish to contact them, they may be reached at:

California Department of Industrial Relations
395 Oyster Point Boulevard South
San Francisco, California 94080
Telephone: (415) 737-2960

We hope this information is responsive to your concerns. Thank you for your interest in worker safety and health.

Sincerely,

Patricia K. Clark, Director
Directorate of Compliance Programs