



Ontario Emergency Medical Services Section 21 Sub Committee

Emergency Medical Services Guidance Note #7

Issue: Hazards Associated with Marijuana Grow Operations and Clandestine Drug Labs

PREAMBLE

As a result of the rising number of Clandestine Drug Labs (CDLs) and Marijuana Grow Operations (MGOs) in existence today, there is an increasing risk that Emergency Medical Services (EMS) will encounter these premises during the course of their work.

Clandestine Drug Labs are makeshift laboratories for manufacturing controlled substances such as methamphetamine (meth/speed), PCP (angel dust) and other drugs (synthetics like Ecstasy). Marijuana Grow Operations are rooms or entire buildings dedicated to production of marijuana. For the purposes of this Guidance Note, an MGO does not include authorized licensed producers who have been issued a license by Health Canada under the federal Access to Cannabis for Medical Purposes Regulation.

Paramedics may unknowingly enter these types of premises during an emergency response. They must be aware of the health and safety hazards that may exist, which include electrocution, propane/natural gas/flammable liquid explosions, structural collapse, chemical hazards, toxic and corrosive atmospheric hazards, armed individuals, and possible booby traps.

Emergency Medical Services should perform a risk assessment (utilizing information available from the Central Ambulance Communications Centre, local Fire and Police Services) in their response area to assist in determining the training requirements for workers. Procedures for emergency responses to CDLs/MGOs should include details from the interagency response perspective (i.e. Incident Management System).

BACKGROUND

Technological advancements allow CDLs and MGOs to be placed in virtually any neighbourhood and in any community. They can be small operations that incorporate a single closet or much larger in scope (e.g. overtaking an abandoned commercial space). CDLs and MGOs differ from other manufacturing processes that paramedics may encounter at emergency scenes, as safety measures are unlikely to be employed at these premises.

Many drugs can be produced in makeshift drug labs; however, most CDLs produce methamphetamines. Common pills for cold remedies are often used as the basis for the production of this drug. The CDL producer extracts ingredients from those pills and, to



Ontario Emergency Medical Services Section 21 Sub Committee

increase the strength of the substance, combines the substance with chemicals such as battery acid, drain cleaner, lantern fuel, antifreeze, propane and/or anhydrous-ammonia.

MGOs utilize high heat and humidity with constant lighting and fertilizing to promote rapid growth of the plants and bud formation. The Royal Canadian Mounted Police (RCMP) have reported that most large scale MGOs have ties to organized crime and that armed combatants may be present in MGO premises.

Once identified as a CDL/MGO, these premises should be treated as crime scenes.

OCCUPATIONAL HEALTH AND SAFETY PRECAUTIONS AND CONTROL MEASURES

Employers should conduct a risk assessment of the hazards associated with CDLs and MGOs to assess the nature and the level of risk to which workers may be exposed. Employers should develop policies, programs and train workers accordingly. An interagency response is to be expected with this type of call and EMS worker training, where possible, should include a cooperative approach with Fire and Police Services.

A CDL/MGO premise should be treated as a crime scene and paramedics should refrain from touching any items, turning on/off any switches or opening appliances that may house toxic chemicals, chemical waste or booby traps.

Safety measures and precautions may include, but are not limited to the following:

General Safety Measures at the Scene:

- Direct staff to stage upwind of the scene if it is a known CDL/MGO response.
- Air quality monitoring by Fire Services (and/or Hazardous Materials response personnel), if available, prior to scene entry; improperly stored chemicals, pesticides and fertilizers can produce atmospheric hazards.
- Upon scene entry, if the premise is found to be a CDL/MGO, retreat from the scene so that safety can be assessed by Police, Fire Services and/or Hazardous Materials response personnel (Note: booby traps are sometimes used to protect the product or to harm those entering the premise). If safe to do so, leave the doors open upon departure to ventilate the area.
- Items/patients may be contaminated or dangerous to touch; minimize interactions when the premise is identified as a CDL/MGO until it is safe.



Ontario Emergency Medical Services Section 21 Sub Committee

- Instruct responders to not to utilize any electrical switches as there may be a flammable/explosion or electrocution hazard.
- Make responders aware that the electrical utility company cannot guarantee that the power has been shut off even after disconnecting the service. Many grow operations will have the hydro bypassed.

Policies and Procedures/Information and Instruction:

EMS employers should provide training for all workers involved in CDL/MGO responses. Information provided to workers during training should include:

- Policies and procedures for CDL/MGO call responses.
- Educating the worker specifically in ways to protect themselves when dealing with CDLs/MGOs (e.g. safe handling of patients, the risks associated with exposure, recognition when decontamination efforts are required, environmental cleaning needs, uniform/linen disposition and exposure reporting).
- Procedures for interagency interaction (i.e. Incident Management System) including Incident and Unified Command models.
- Procedures for contacting the Canadian Transport Emergency Centre (CANUTEC) when hazardous materials technicians are not on scene or en route to the scene. (Note: contact information for CANUTEC is in the References and Resource Materials section of this Guidance Note).

Personal Protective Equipment:

- Most non-permeable gowns are capable of providing protection against small splashes of some chemicals but the corrosiveness, volatility and cryogenic properties of some of the chemicals/compressed gases utilized in CDLs/MGOs may require specialized personal protective equipment (PPE) for proper handling and decontamination of PPE after use.

Appropriate PPE to be worn may include Self Contained Breathing Apparatus that is not available to most EMS providers. Therefore, paramedics should not attempt to enter the scene or treat/transport patients until decontamination requirements are determined, and performed, where necessary.



Ontario Emergency Medical Services Section 21 Sub Committee

General Information about MGOs and CDLs

- Common Signs of MGOs and CDLs that paramedics should be aware of:
 - Strong odours emanating from the premise (MGOs/CDLs).
 - Exterior stains on the premise; there may be signs of sweating, staining, condensation or "wet spots" on the siding, stucco, or foundations of the home (MGOs).
 - There may be excessive condensation on the windows due to high humidity levels in the premise (MGOs).
 - Presence of multiple mason jars, soda bottles, rubber tubing, coffee filters, hot plates, stained Pyrex or cooking dishes, propane tanks, high-pressure cylinders, turkey basters, rubber gloves, aluminum foil, measuring cups, corrosives, solvents, multiple freezers, pails, paint cans and different chemical containers (CDLs).
 - Enhanced security measures on the premises such as high fences, flood lights, multiple locks on doors, security bars on the windows, security cameras, and "beware of dog" signs. (CDLs/MGOs).
 - Patients may meet you outside of the premise with chemical burns to the hands and face that could be consistent with injuries often suffered by those in a clandestine laboratory. Patients experiencing breathing difficulties as a result of chemical burns could also be another indicator. Some patients will not reveal how they incurred the injuries, or they may give a reason that is not consistent with the types of injuries sustained. The patients may also be extremely agitated and difficult to treat (MGOs/CDLs).

- Additional Information on CDLs:
 - CDLs produce about five pounds of hazardous waste for every one pound of drug.
 - CDLs are often found in mobile (motor homes/vans) or rural settings (houses, sheds or barns) where the waste products are less visible and the chemical odours are not as noticeable to neighbours.
 - The chemical reactions that occur during the manufacturing process may produce toxic vapors that are absorbed by wall and floor surfaces.

- Additional Information on MGOs:
 - MGOs are found in all types of buildings and in all socio-economic neighbourhoods.
 - They often bypass proper electric utilities connections. This reduces the likelihood that their large hydro use will be noticed by authorities.



Ontario Emergency Medical Services Section 21 Sub Committee

SOME RELEVANT OCCUPATIONAL HEALTH AND SAFETY ACT REQUIREMENTS

Employers are required by the Occupational Health and Safety Act (OHSA) to:

- Take every precaution reasonable in the circumstances for the protection of a worker – OHSA Clause 25 (2)(h)
- Provide information, instruction and supervision to a worker to protect the health or safety of the worker – OHSA Clause 25 (2)(a)
- Acquaint a worker or a person in authority over a worker with any hazard in the work – OHSA Clause 25 (2)(d)

REFERENCES AND RESOURCE MATERIALS

The Canadian Transport Emergency Centre (CANUTEC) may be called collect at (613) 996-6666 (24 hours) or by Cellular *666 (Press Star 666, Canada only).

Royal Canadian Mounted Police, [Marihuana Grow Operations](#).

Royal Canadian Mounted Police, [Clandestine Synthetic Drug Laboratories](#).

Royal Canadian Mounted Police, [Marihuana and Synthetic Drug Initiatives: Tools to Protect Prospective Homeowners](#).

Royal Canadian Mounted Police and the Canadian Real Estate Association, [Marihuana Grow Operations and Synthetic Drug Labs: What Realtors Need to Know](#).

This document should be shared with the workplace Joint Health and Safety Committee or Health and Safety Representative, incorporated into the workplace occupational health and safety policy and program where appropriate, and posted on the Public Services Health & Safety Association website and the websites of other interested stakeholders.



Ontario Emergency Medical Services Section 21 Sub Committee

This Guidance Note has been prepared to assist the workplace parties in understanding some of their obligations under the Occupational Health and Safety Act (OHSA) and the regulations. It is not intended to replace the OHSA or the regulations and reference should always be made to the official version of the legislation.

It is the responsibility of the workplace parties to ensure compliance with the legislation. This Guidance note does not constitute legal advice. If you require assistance with respect to the interpretation of the legislation and its potential application in specific circumstances, please contact your legal counsel.

While this Guidance Note will also be available to Ministry of Labour inspectors, they will apply and enforce the OHSA and its regulations based on the facts as they may find them in the workplace. This Guidance Note does not affect their enforcement discretion in any way.