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 paramedic services 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.

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

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

BACKGROUND

CDLs and MGOs are also increasing in technological advancements allowing them 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, overtaking an abandoned commercial space for example. 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 are 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 increase their strength, 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 plant 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.

HEALTH AND SAFETY PRECAUTIONS AND CONTROL MEASURES

Employers are to identify the hazards associated with CDLs and MGOs and assess the dangers posed to workers from these hazards. Accordingly, employers should complete a risk assessment that assesses the nature and the level of risk to which workers may be exposed and develop policies, programs and train workers accordingly. An interagency response would be expected with this type of call and EMS providers, where possible, should include a cooperative approach with Fire and Police Services with respect to worker training.

Treating the CDL/MGO premise as a crime scene will assist in paramedics refraining from touching any items, turning on/off any switches or opening appliances that may be housing toxic chemicals/waste or booby traps.

Engineering Controls:

- Procedures that 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.
- 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. 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.

Administrative Controls:

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.
• Information, instruction and training programs aimed at 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.

Personal Protective Equipment Includes:

• Most non-permeable gowns are capable of providing protection against small splashes of some chemicals but the corrosivity, volatility and cryogenicity of the chemicals/compressed gases utilized in CDLs/MGOs require specialized personal protective equipment (PPE) for proper handling.

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

General Safety Measures and Other Information

The control measures identified above should be augmented with focused training and educational components that incorporate the following:

• CDL/MGO recognition strategies:
  o Strong odours emanating from the premise (CDLs/MGOs).
  o 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).
  o There may be excessive condensation on the windows due to high humidity levels in the premise (MGOs).
  o 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).
  o Patients 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 (CDLs/MGOs).

- Enhanced security to detect investigation by police or to deter break-ins by others. Security measures may include high fences, flood lights, locks on doors, bars on windows, security cameras, and "beware of dog" signs. (CDL/MGO).

- CDL information:
  - 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 aren’t 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.

- MGO information:
  - 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.

- Responders are to be instructed not to utilise any electrical switches as there may be a flammable/explosion or electrocution hazard.

- Improperly contained chemicals, pesticides and fertilizers can produce atmospheric hazards.

- Booby traps are sometimes utilized to protect the product or to harm those entering the premise.

**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


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.

This Guidance Note has been prepared to assist the workplace parties in understanding 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.