

CLANDESTINE DRUG LAB SOP (WEB VERSION)

PURPOSE:

To establish a set of standard operating procedures for the Ohio EPA Emergency Response (ER) Unit to follow when receiving notifications about clandestine drug lab sites through the ER Unit's 24-hour hotline.

BACKGROUND:

The number of clandestine drug labs in the United States illegally producing methamphetamine and other illicit drugs is on the rise. The rise of these labs stems from the availability of precursor chemicals and the increasing popularity, ease of manufacture, low production cost, and high profits of the drugs. Numerous regulated hazardous chemicals are traditionally used in these labs under very unsafe conditions by people who have little understanding of chemistry and chemical reactions. Due to the production processes, haphazard storage of incompatible chemicals, or disposal of chemical wastes, clandestine drug labs pose threats to human health and the environment. This, in turn, has resulted in increased requests for Ohio EPA assistance to address environmental contamination and disposal issues surrounding these labs.

Clandestine drug lab emergency response is a multi-disciplinary endeavor. Law enforcement officers, firefighters, Emergency Medical Service (EMS) providers, public health officials, and environmental personnel all may play a role in the management of these incidents. This document outlines the procedures that the Ohio EPA ER Unit should take when confronted with sites such as these. The procedure has been designed to be brief, with the substance of it residing in the "supporting documentation/attachments" section. This way an On-Scene Coordinator can use the procedure as a reference manual and also use the attachments as handouts or FAQ sheets if necessary. It is the intent of the ER Unit to be able to update, or add, attachments to this section without revising the actual procedure itself.

DEFINITIONS:

Clandestine Drug Lab (CDL):: An illegal and covert operation at which a controlled substance is produced by chemical reactions. Clandestine drug labs range from crude, makeshift operations to highly sophisticated facilities. They can be found in rural and urban areas and exist in mobile and permanent settings.

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- Duty Officer (DO):** Central office employee whose main responsibility is the staffing of the Duty Room. Their job duties include documenting initial pollution incident reports, disseminating information, handling general information calls, etc. Part of the job duties also include assisting the ER/SI Orphan Drum Coordinator in investigations of abandoned drums. For the purposes of this document, a Duty Officer can also include anyone temporarily assigned to document reports during regular working hours due to heavy call volume or under staffing. (Also called day Duty Officers).
- Night Duty Office (NDO):** An Agency employee who volunteers to act as a Duty Officer and take calls after hours, on weekends, and holidays to ensure 24-hour coverage of incidents occurring around the state.
- On-Scene Coordinator (OSC):** Field responder in the Emergency Response Unit whose main job duties include the investigation and mitigation of emergency pollution incidents. An OSC is also responsible for the documentation of the circumstances surrounding the incident as well as the collection of any documentation and/or evidence that may be associated with the incident. For the purposes of this document, any ER field responder may be classified as “Environmental Specialist II,” “Environmental Specialist III” and/or their “Environmental Supervisors.”
- Drug Enforcement Agency: (DEA)** Arm of the federal government responsible for enforcing controlled substances laws and regulations of the United States.

PROCEDURE:

- I. **Initial Notification/Duty Officer Responsibilities**
 - A. Upon notification of a CDL, the ER Duty Officer shall ask that the reporter make

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immediate notification to the appropriate DEA Resident Office in Ohio. The contact numbers for the DEA Resident Offices in Ohio are contained in section IV of this procedure entitled "Supporting Documentation/Attachments"

- B. The Duty Officer will create an IPIR from the notification and will inform the District Office OSC on call via standard operating procedures.
- C. Should, at any time, local fire or law enforcement officials request assistance from an Ohio EPA representative, the Duty Officer will notify the OSC on call in the district.

II. District Office/On-Scene Coordinators

- A. After receiving a call from a Duty Officer regarding an ongoing release or request for assistance, the OSC may respond to the incident via phone or actual response based on the extent of environmental contamination or exposure potential to the public.
- B. Should a response be requested by primary response agencies, the OSC shall assist responders by providing technical guidance, coordination with other Ohio EPA divisional representatives, and investigation of environmental contamination.
- C. If, in the course of a CDL incident response, waste migration threatens or has entered surface water, the OSC may take actions to prevent further migration and coordinate the remediation of the affected waterway(s).
- D. If available, the OSC may participate in CDL training and district CDL exercises with other response agencies.

III. Notifications/Referrals

- A. Ohio EPA Special Investigations Unit (SIU) - Depending on incident-specific circumstances, a CDL can be an environmental crime scene. If the reporting agency or DO/OSC has reason to believe that illegal storage or disposal of hazardous wastes has taken place at a CDL, SIU should be contacted by the DO or OSC as soon as practicable depending on site conditions. If SIU determines that a criminal environmental investigation is warranted, SIU will coordinate with the appropriate response and criminal investigatory agencies to conduct the

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environmental investigation in a timely manner.

- B. Ohio EPA -Notifications/referrals should be made to other Ohio EPA divisions/programs as deemed appropriate by the OSC.
- C. Ohio Department of Agriculture (ODA) - Per the State's HazMat MOU, the DO or OSC should make notifications/referrals to ODA in all cases involving theft, tampering, or release of anhydrous ammonia from a facility regulated by ODA.
- D. Ohio Department of Health(ODH)/Local Health Departments - In cases where Ohio EPA has no jurisdiction, such as interior contamination of a structure, the DO or OSC should notify/refer the site to ODH and/or local health department.

IV. Supporting Documentation/Attachments

This supporting documentation represents only a small amount of the information available on this subject. Further info can be obtained at the following web sites:

- www.kdhe.state.ks.us/methlabs/index.html
- www.kci.org/meth_info/meth_cleanup.htm
- www.doh.wa.gov/ehp/ts/cld.htm
- www.usdoj.gov/dea/pubs/straight/meth.htm
- <http://mfiles.org>

The Ohio EPA Emergency Response Unit maintains supporting documentation and attachments at each Ohio EPA district office. To obtain copies of these documents, or to speak with an OSC, please contact your appropriate Ohio EPA district office.

DEA Resident Offices in Ohio:

- DEA Cincinnati Resident Office (513) 684-3671
- DEA Cleveland Resident Office (216) 522-3705
- DEA Columbus Resident Office (614) 469-2595
- DEA Dayton Resident Office (937) 291-1988
- DEA Toledo Resident Office (419) 259-6490
- DEA Youngstown Resident Office (330) 740-7000