

October 25, 2004

Question:

I was asked by Animal Control personnel about the procedures they should take when asked to remove dogs or cats that have been living in Meth. houses when the Sheriff's office has busted the owners. Their concern was that everyone involved (other than themselves) had the proper training and PPE to protect themselves when entering the house and removing items from the house.

Their job requires them to take the animals from the residence and to an impound at the county animal shelter until further notice.

Here is where the questions come into play:

- (1) What kind of protection do the dog catchers need to protect themselves from being contaminated by these animals that have been living in these Meth. houses?
- (2) Can you just transport them in a regular animal control truck, then would they have to decon the truck in which the animal was transported?
- (3) What procedures would you use to wash the animals? What do you do with the water that was used? Does it have to be caught and sent off for disposal as hazardous waste water?

Answer:

The Hazardous Waste Operations and Emergency Response (HAZWOPER) rules apply to response and clean-up personnel who deal with clandestine drug labs. Tactical operations in which clandestine drug labs are assumed to be chemically contaminated, 1910.120(q) applies.

If animal control personnel enter an illegal drug lab facility or pick up a potentially contaminated animal at the incident scene, HAZWOPER rules apply. However, 1910.120(q)(4) allows for **skilled support personnel** "*who are needed temporarily to perform immediate emergency support work that cannot reasonably be performed in a timely fashion by an employer's own employees, and who will be or may be exposed to the hazards at an emergency response scene, are not required to meet the training required in this paragraph for the employer's regular employees. However, these personnel shall be given an initial briefing at the site prior to their participation in any emergency response. The initial briefing shall include instruction in the wearing of appropriate personal protective equipment, what chemical hazards are involved, and what duties are to be performed. All other appropriate safety and health precautions provided to the employer's own employees shall be used to assure the safety and health of these personnel.*" Keep in mind, other rules apply, such as 1910.134, Respiratory

Protection, 1910.1200, Hazard Communication, and a PPE hazard assessment under 1910.132, Personal Protective Equipment, General Requirements.

Once the animal is removed and is going to be "decontaminated" then 1910.120(b)-(o) cleanup operations rules apply which includes forty hour training and requirements for decontamination. Usually level C is the minimum requirement for PPE, however, the PPE hazard assessment should aid in making that determination.

I've attached a link to the 1910.120 HAZWOPER rule and a OR-OSHA publication on HAZWOPER.

http://www.cbs.state.or.us/external/osha/pdf/rules/division_2/1910-120.pdf

<http://www.cbs.state.or.us/external/osha/pdf/pubs/2117.pdf>

As to specifics you asked, PPE considerations are part of the employer's PPE hazard assessment. Appendix B found in 1910.120 addresses this subject. I suggest you contact the Department of Environmental Quality (DEQ) who regulates hazardous waste, the Department of Human Services, Clandestine Lab program, and the Oregon State police who developed their agency's clandestine drug laboratory policy (possible a good resource).