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REGULATORY/MEDICAL HEALTH SERVICES ENVIRONMENTAL HEALTH

!!DRAFT!!

Protocol for Fentanyl Contaminated Properties

The purpose of this protocol is to protect residents from adverse health effects that could result from exposure to the highly toxic opioid fentanyl and various fentanyl analogues (carfentanyl, acetylfentanyl, etc.). Fentanyl exposure can possibly occur by inhalation, ingestion, injection, and dermal uptake causing depression of the respiratory system with a fatal dose as low as 2 mg (or less for analogues). Fentanyl powder has been increasingly used in illicit drug manufacturing activities (heroin, methamphetamine, crack cocaine, etc.), pill presses, and other clandestine distribution operations.

Upon notification of fentanyl used or believed to be used in an illicit operation, the property or unit shall be considered to be a chemically contaminated property and the property will be posted to restrict access in accordance with the procedures in California Health and Safety Code, Section 25400.18 under the authority of the California Health & Safety Code, Division 101, Section 101030 (County Health Officers authority to protect public health).

As the responsible party, the property owner of record will be contacted as soon as reasonably possible and informed of the situation and requirements for mitigation. California Health and Safety Code, Chapter 6.9.1, *Methamphetamine Contaminated Property Cleanup Act of 2005* illustrates the general framework of the process for the cleanup and decontamination of the fentanyl contaminated property that will be required of the property owner in order for the Director of Environmental Health (or their designee) to eventually consider the dwelling unit safe for human occupancy. The posting restricting any unauthorized access to the property will only be removed after it has been deemed safe by Environmental Health in accordance with this protocol. The specific procedures for the cleanup of fentanyl contaminated properties are summarized as follows:

1. The property owner, representative of the property owner, or other identified responsible party shall enlist the services of a Certified Industrial Hygienist (CIH) experienced in clandestine lab cleanup and contaminated site mitigation. The CIH shall coordinate with Environmental Health to access the property to take wipe samples to determine the extent of contamination. The number of wipe samples taken will depend on the specifics of the contaminated property; however, the CIH shall ensure an appropriate number of samples are taken in suitable locations to adequately characterize all areas, rooms, and spaces in the contaminated dwelling unit and/or property. The wipe samples shall be sent to a certified laboratory capable of analyzing wipe samples for fentanyl at a minimum detection limit (MDL) or limit of quantification (LOQ) of 0.1 $\mu\text{g}/100\text{cm}^2$ or lower.
 - a. The contaminated property may only be considered safe for human occupancy and the posting may only be removed by Environmental Health when all samples indicate levels of fentanyl less than or equal to 0.1 $\mu\text{g}/100\text{cm}^2$. This action level has been developed through extensive research, modeling, and

technical guidance from expert toxicologists, industrial hygienists, and other medical professionals. This action level applies only to fentanyl; other analogues may require less or more stringent action levels at the discretion of the Environmental Health Department.

NOTE: Most laboratory's limit of detection or quantification for fentanyl wipe samples is $0.1 \mu\text{g}/100\text{cm}^2$ making the clearance level for those circumstances non-detect (ND) for all samples. The CIH should consult the laboratory that will be performing the analysis prior to taking the samples to ensure the appropriate protocol is followed and the appropriate materials are used. The materials provided by the contracted laboratory should be used for sampling wherever possible. In general, surface wipe samples shall be taken using sterile gauze pads pre-wetted with approximately 4mL analytical grade isopropyl alcohol. Standard industrial hygiene wipe-sampling technique using an "S" followed by an "M" wipe pattern shall be used over the carefully selected 100cm^2 sampling areas. Individual sterile sample containers shall be used for each sample and new disposable nitrile gloves shall be donned for each sample to exclude the possibility of sample carry-over.

2. The project CIH shall submit a Preliminary Site Assessment Report and Mitigation Work Plan (PSA) to Environmental Health for review. At a minimum, the PSA should contain and/or address the following items:
 - a. Review of the sampling methods, identification of the contracted laboratory used for analysis, and a description of the laboratory procedures.
 - b. The analytical results of the sampling including the location of the samples (description and map), identification of field blank(s), and fentanyl residue levels (with lab report and chain of custody forms attached as an appendix).
 - c. In the event that the analytical results are less than or equal to $0.1 \mu\text{g}/100\text{cm}^2$, the project CIH shall conclude the report with a statement that the sampling performed was representative of the property and, in their professional opinion, the property is safe for human occupancy.
 - i. After Environmental Health's review of the PSA containing the results of the wipe samples, below or equal to $0.1 \mu\text{g}/100\text{cm}^2$, a letter of approval and no further action notice will be issued to the property owner or other responsible party. Upon issuance of the approval letter, Environmental Health will remove the posting on the residence and the restriction of access to the unit will be lifted.
 - d. In the event that the analytical results are greater than $0.1 \mu\text{g}/100\text{cm}^2$, the project CIH shall include specific mitigation procedures and practices necessary to successfully decontaminate the property including, at a minimum, the following:
 - i. Selection criteria for a qualified and certified hazardous materials mitigation contractor to perform the described abatement work.
 - ii. Personal Protective Equipment (PPE) required for entry to the property.
 - iii. Personal Protective Equipment (PPE) required for mitigation contractors performing abatement work and decontamination.
 - iv. Identification of work zones, containments, engineering controls, administrative controls, or other worker protections to prevent exposure and further contamination of clean areas.
 - v. Description of the basic mitigation measures including identification and justification for which items will be decontaminated, demolished, or disposed of; specific protocols for each should be explained in detail.
 - vi. Protocol for remaining personal items of the previous tenant.

- vii. Decontamination materials, equipment, and procedures for any fixed furniture, surfaces, walls, ceiling, floor or other items that will not be sent for disposal.
 - viii. Explanation of protocol for properly disposing of any hazardous materials generated (chemicals, cleaners, solvents, etc.) and any potentially hazardous materials encountered throughout the mitigation process (lead paint, asbestos containing materials, etc.); include lab reports for any pre-mitigation material analysis performed as an appendix.
 - ix. Considerations for HVAC system or other shared or exhausted ventilation system features (intakes, grills, vents, etc.).
 - x. Any additional mitigation measures as required or recommended by Environmental Health, California Health and Safety Code, Section 25400.36-25400.37, the project CIH, or other health professional for the particular site.
3. After approval of the PSA by Environmental Health and the completion of mitigation work, the CIH shall follow the same protocol to take wipe samples to again determine if any fentanyl contamination remains above the action level of $0.1 \mu\text{g}/100\text{cm}^2$.
 - a. In the event that the analytical results are less than or equal to $0.1 \mu\text{g}/100\text{cm}^2$, the project CIH shall submit a Post Mitigation Report concluding the project (should contain all of the information described above in #2, a-d).
 - b. In the event that the analytical results are greater than $0.1 \mu\text{g}/100\text{cm}^2$, the project CIH shall develop an additional PSA repeating the process from #2d above.
4. After Environmental Health reviews the Post Mitigation Report containing the results of the wipe samples at or below $0.1 \mu\text{g}/100\text{cm}^2$, a letter of approval and no further action notice will be issued to the property owner or other responsible party. Upon issuance of the approval letter, Environmental Health will remove the posting on the residence and the restriction of access to the unit will be lifted.
5. The property owner shall be held responsible for ensuring that all notification requirements in accordance with California Health and Safety Code, Section 25400.28 are met throughout the process.

These draft protocols are current as of May 1, 2018 and are subject to change as additional information is gathered or otherwise becomes available.