

RD AN No. 4629 (1940-G)
November 29, 2011

TO: Rural Development State Directors and
National Office Program Officials

ATTN: Rural Housing and Business Programs
Deputy Administrators, Assistant Administrators,
Program Directors, Area Directors, Area Specialists,
Loan Specialists and State Environmental Coordinators

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SUBJECT: Safety In and Around Illegal Methamphetamine Laboratories and
Associated Environmental Cleanup

PURPOSE AND INTENDED OUTCOME:

This Administrative Notice (AN) provides guidance to Rural Development staff on how to recognize and properly handle properties previously used for the illegal production of the drug methamphetamine (hereinafter called 'meth'). This guidance is intended to educate field staff on how to recognize when a building has been used as an illegal meth lab and be mindful of the dangers of hazardous materials associated with the illegal production of meth. This guidance is also intended to speed up the disposal of Real Estate Owned (REO) properties used as illegal meth labs by outlining standard remediation procedures for the cleanup of contaminated meth labs.

COMPARISON WITH PREVIOUS AN:

This AN replaces RD AN No. 4499 (1940-G) dated March 5, 2010, which expired on March 31, 2011.

EXPIRATION DATE:
February 28, 2013

FILING INSTRUCTIONS:
Preceding RD Instruction 1940-G

BACKGROUND:

Nationwide, meth lab seizures which began to decline from 12,619 in 2005 to 7,347 in 2006, have now risen again to 11,239 in 2010. Rural Development field staff needs to be aware of the potential for encountering meth labs in rural housing. Meth laboratories have been seized in homes in residential areas, vehicles, hotels/motels, apartments, kitchens, bathrooms, garages, and various other outbuildings. The most productive laboratories are commonly located in rural areas, such as farms, rural residences, and forestry land. In addition, rural areas are often targeted for laboratory manufacturing to avoid detection by law enforcement.

IMPLEMENTATION RESPONSIBILITIES:

Traditionally, laboratories are located in sparsely populated or isolated rural areas in order to avoid detection. The fact that these labs will most likely be found in rural America, increases the likelihood that Rural Development field staff might encounter an illegal meth lab during the course of performing their job. Therefore, it is critical that Rural Development field staff be able to recognize the signs that a property has been used, or is still being used, for the illegal production of meth. The timely identification of a property as an illegal meth lab should reduce the chance that Rural Development staff will come in contact with potentially dangerous individuals and the hazardous materials associated with the illegal production of meth. Knowledge that a property was once used as an illegal meth lab can also be critical information when calculating property market value and net recovery value. It is important to remember that the cost to clean up a meth lab usually averages between \$4,000 and \$5,000 but can be as high as \$150,000.

The following list outlines some common indicators that a property may have been used as an illegal meth lab:

- Access denied to landlords, neighbors, and other visitors.
- Renters who pay their landlords in cash. (Most drug dealers trade exclusively in cash.)
- Covering or blacking-out windows.
- Burn pits, stained soil, or dead vegetation.
- Waste in trash pits or piles, with high amounts of:
 - packaging from over-the-counter cold pills;
 - empty containers from antifreeze, white gas, ether, starting fluids, freon, lye or drain openers, paint thinner, acetone, or alcohol;
 - compressed gas cylinders or camp stove (e.g., Coleman) fuel containers;
 - packaging from Epsom salts or rock salt;

- anhydrous ammonia tanks, propane tanks, or coolers containing anhydrous ammonia;
 - pyrex/glass/Corning containers or other kitchen glassware with hoses or duct tape;
 - coolers, Thermos bottles, or other cold storage containers;
 - respiratory masks and filters, dust masks, rubber gloves, funnels, hosing, and clamps; and
 - coffee filters, pillowcases or bed sheets stained red (used to filter red phosphorous).
- Apartments or buildings that smell like chemicals, including sweet, bitter, ammonia, or solvent smells.

POTENTIAL HEALTH EFFECTS

There are dozens of chemical products and substances that are used interchangeably to produce meth. Hazardous chemicals may also be formed during the manufacture of meth. In addition, a minimum of 5 to 7 pounds of chemical waste are produced for each pound of meth manufactured.

The effects caused by exposure to meth lab chemicals depend on (1) the lab process used, (2) the amount of chemical and length of exposure, and (3) the age and health of the person exposed. The chemicals found in an illegal meth lab may enter the body by being breathed, eaten, or absorbed through the skin.

Acute exposure to the chemicals found in an illegal meth lab can cause shortness of breath, cough, chest pain, dizziness, lack of coordination, chemical irritation, or burns to skin, eyes, nose, and mouth. Death could result when exposure is to a particularly toxic chemical or the person exposed is particularly vulnerable. The chance of acute exposure is greatest during or immediately after production. Personnel who enter illegal meth labs after production has stopped, but before proper ventilation or cleaning, can be exposed to hazardous chemical wastes and experience unhealthy effects. Less severe exposure can cause headaches, nausea, dizziness, or fatigue. These less-severe symptoms usually go away after several hours of exposure to fresh air. There have been, however, reports of people who have moved into former lab sites who have suffered chest and respiratory symptoms months after lab chemicals were removed.

ON-SCENE SAFETY

Rural Development employees shall not conduct any sampling or cleanup at suspected or confirmed methamphetamine laboratories. Contact your local environmental protection or law enforcement agency for guidance and information regarding hazardous material contractors.

If you believe you have discovered an illegal meth lab or the site of an abandoned lab, immediately notify local law enforcement and do not enter the site. Remember, safety first. Do not touch, inhale, or otherwise expose yourself to chemicals. Anyone who inadvertently enters a lab should immediately leave the area without disturbing the cooking process, chemicals, or equipment. Illegal meth lab sites are potentially dangerous and they are crime scenes. Law enforcement officers will decide when the property can be entered. If you feel that you may have been exposed to chemicals, you should consult with a physician for determination and advice. In addition, thoroughly clean your shoes and other items of clothing that may have been exposed.

Rural Development staff should follow the following guidelines:

- Only enter contaminated areas after ventilation and gross cleanup.
- Limit time on-site to minimize exposure.
- If exposed, take action to contain or eliminate (e.g., wash exposed skin, remove contaminated clothing).
- Avoid transporting contamination on clothes or shoes.
- Seek medical care if needed.
- When a meth lab has been identified, the Rural Development Program Director and State Environmental Coordinator should be notified.

SITE EVALUATION AND SAMPLING

A site evaluation is needed to: (1) assess immediate and potential for long-term danger from any contamination, and (2) determine the need and method for decontamination. The areas of contamination are divided into primary and secondary. The primary areas include production, inside disposal, and outside disposal. The secondary areas are areas where contamination has migrated.

The primary area of contamination directly related to the production of meth can result from spills, boil over, explosions, and chemical fumes created during production. Contamination may be found on floors, walls, ceilings, glassware, containers, working surfaces, furniture, carpeting, draperies, other textiles, plumbing fixtures and drains, and heating and air-conditioning vents. The primary area of contamination directly related to indoor disposal of waste can include sinks, toilets, bathtubs, plumbing traps and floor drains, vents, vent fans, and chimney flues. The primary area of contamination directly related to outdoor disposal of wastes can be caused by dumping or burning on or near soil, surface water, groundwater, sewer or storm systems, septic systems, and cesspools.

The secondary areas of contamination may include locations where contamination has migrated (e.g., hallways and high traffic areas), common areas in multiple dwellings, and

adjacent apartments or rooms, and common ventilation or plumbing systems in hotels and multiple dwellings.

If Rural Development does not own the property (i.e., it is not an REO property), a determination must be made as to the best course of action that should be taken.

Consultation with local law enforcement officials is required and consultation with the National Office Program and Program Support Staff (PSS) is recommended. If Rural Development owns the site (i.e., it is an REO property), the Agency should contract for the services of a qualified hazardous materials professional. This professional will determine what kind of chemical sampling will be necessary. The contractor will compare sample results to determine if any Federal, State, or local action levels have been exceeded and if further cleanup is necessary. Cleanup requirements will depend on the types of chemicals found; the manufacturing process used, how long the lab was active and will be based on applicable Federal, State, or locally established protocols.

CLEANUP OF ILLEGAL METHAMPHETAMINE LAB

Indoor contamination found at illegal meth labs might require one or more of the following cleanup procedures:

- Removal
- Ventilation
- Neutralization
- Washing
- Encapsulation

Outdoor contamination found at an illegal meth lab may require:

- removal,
- drainage control,
- removal or treatment of contaminated water or soil,
- alternate water supplies when the potable water source is contaminated, and
- site controls such as fencing or signs.

Cleanup of a site may be as simple as venting and the removal of chemicals, apparatus, and wastes. However, demolition of a contaminated structure may be the best option if costs for cleanup exceed appraisal value. Cost estimates for cleanup should be determined by the environmental professional responsible for the site evaluation and will be reflected in the appraisal of value. In all cases, Rural Development will work with Federal, State, and local health officials to verify that any illegal meth lab is properly cleaned and contamination levels are below those considered hazardous. It may be necessary to notify neighboring property owners of cleanup activities. This

determination should involve discussion and direction from the site assessment professional and State or local officials.

DISPOSAL OF ILLEGAL METH LAB PROPERTIES

Rural Development will not allow occupancy of a property under their custodial care or ownership that was formerly used as an illegal meth lab until cleanup has been completed and verified by a hazardous materials professional. If the property will be going into foreclosure, another option, in lieu of cleanup, is to disclose the previous existence of the meth lab and adjust the price of the property for the sale. Please contact your regional OGC to develop disclosure statements and deed restriction language appropriate for your state when pursuing sale of contaminated properties that are not cleaned up.

ADDITIONAL CLEANUP INFORMATION AND POINTS OF CONTACT

More detailed information on meth lab cleanup can be found at <http://teamrd.usda.gov/rd/rhs/PSS/Meth/Generic%20Cleanup%20of%20Clandestine%20Methamphetamine%20Labs.pdf>

The US Drug Enforcement Administration (DEA) provides a website that contains addresses of some locations where law enforcement agencies reported they found chemicals or other items that indicated the presence of either clandestine drug laboratories or dumpsites (National Clandestine Laboratory Register: <http://www.justice.gov/dea/seizures/index.html>). In most cases, the DEA is not the source of the entry, has not verified the entry, and does not guarantee the entry's accuracy. The web site is an incomplete resource that should be used in conjunction with other resources.

Please direct questions pertaining to this AN to your State Environmental Coordinator or Program Director. If they are unavailable or unable to answer your questions, you may contact Frank Mancino of the National Office Program Support Staff at (202) 720-1827 or Frank.Mancino@wdc.usda.gov.