

UW FACILITIES PROCEDURE FOR DRUG RELATED CLEAN-UP

UPDATED NOVEMBER 29, 2023

PURPOSE

This work practice is for use by Facilities staff on the Seattle campus 1410 NE Campus Parkway Seattle WA 98195 tasked with removal of drug-related items; cleanup of these materials must be conducted with proper equipment, training, and handling practices in order to minimize employee exposure risks.

This document is the certification of hazard assessment for PPE. Drug-related items includes paraphernalia (equipment used to produce, conceal, and consume illicit drugs), prescription drugs, and/or visible amounts of illicit drugs, which may need to be removed from grounds, restrooms, buildings, parking structures, stairwells, or other areas on campus.

Note that this procedure does not cover the following situations:

- Pharmacy-related drug cleanups and spills
- Laboratory-related drug cleanups and spills

SCOPE

This Procedure applies to all UW Facilities employees that clean up areas that may contain these items.

Supervisor/Manager Guidance

For UWF employees with the required training, the tasks outlined in this Procedure can be performed effectively and safely. If it appears the clean-up or removal task is beyond the scope of an employee to complete (time to perform task, complexity of the clean-up, etc.), the employee should notify their supervisor or manager. Supervisors and managers can assess on a case-by-case basis whether clean-up requests can be performed by their employees or submit a work order for an outside contractor (Regulated Materials contractor or Procurement) to complete the work. They can consult with their departmental safety staff as needed.

Conditions to consider:

- Amount of unconsumed illicit drug(s) if greater than the amount for personal use i.e., small volumes that appear to be intended for personal use- such as 1" wide individual bag of powder (see photos below), or a small number of pills that could be contained in a standard prescription bottle
- Type of matter to be cleaned up/removed
- The complexity of hazards present (broken glass, unmarked containers with unknown contents, etc.)
- The size of the area to be cleaned, decontaminated or cleared

ROLES AND RESPONSIBILITIES

Role	Responsibility
Department management	<ul style="list-style-type: none"> • Ensure appropriate training is provided to all relevant Facilities employees. • Ensure all appropriate supplies and PPE are available.
Supervisor or person assigning work	<ul style="list-style-type: none"> • To evaluate conditions, perform a hazard assessment and assign work as appropriate. • Ensure employees are up to date with the required training. • Work with RMO and department safety staff to determine if contractor assistance is necessary.
UWF Safety	<ul style="list-style-type: none"> • Maintain and update procedure as appropriate.
Procurement/UWF Stores	<ul style="list-style-type: none"> • Ensure contractors' procedure is provided and indicates compliance with applicable regulations. • Act as purchasing organization to procure appropriate supplies.
Employees	<ul style="list-style-type: none"> • Employees are expected to follow all UWF procedures and training to safely gather, contain and dispose of drug paraphernalia and/or sharps.

TRAINING

Required:

- Bloodborne Pathogens for Non-Laboratory Personnel ([online](#)), prior to initial work with BBP, and then annually. This includes offering of the Hepatitis-B vaccine prior to assignment to potential BBP cleanup. (Note: Building Services provides in person training annually to their unit)
- Hazard Communication/GHS training. This training must be received every 5 years
- A Hazard Communication/GHS training module specific to illicit drugs will be provided to supervisors to cover with effected employees and will also be provided in-class for initial training and retrain. This training must be received every 5 years
- Respiratory Protection Training and Fit Testing. This training must be received annually.

- Back safety and Injury Prevention at start of work assignment
- The contents of this work practice, as determined by their department or minimally every 5 years

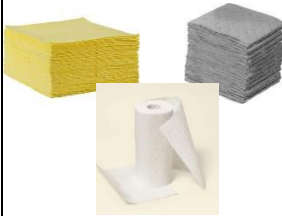
PROCEDURES FOR DRUG USE CLEAN-UP

TASKS/STEPS	POTENTIAL HAZARDS - CONSEQUENCES
Assessing the area	
PROCESS AND CONTROLS (SAFEGUARDS)	
<ol style="list-style-type: none"> 1. Visually assess the area, avoiding contamination. 2. If active drug use is occurring in any area or if occupied by unauthorized persons, employees should leave the area immediately and call 911 and tell the dispatcher their specific UW location. 3. If there is <i>any</i> potential for contamination during assessment, prior to entering the area: <ol style="list-style-type: none"> a. Don two pairs of nitrile gloves (double-glove) and respiratory protection (a N95 respirator¹ is required if visible presence of loose drug powders/liquid are present²) b. Don safety goggles (NOT IMPACT GLASSES) c. Don Tyvek (or other disposable) coveralls and booties/rubber boots (cover all skin on arms and legs) so there is no exposed skin on extremities. Coveralls protect clothing from contamination as well. 4. Ensure no occurrence of suspicious activities are present. Request appropriate escort (Police, supervisor, coworker) if necessary. 5. Take visual inventory, take photos for documentation (if possible) of present items, noting types of drug items (drugs vs. paraphernalia), and volumes of identifiable drug substances. 6. If <u>unused</u> drugs are present, they either must be cleaned up/disposed of immediately or transported to a secured area; they cannot be left unattended. The area can be cordoned off while proper cleanup supplies are brought to the site. 7. Call UWPD at (206) 543-0507 to notify, assess, pick up, etc. prior to clean up. 	

TASKS/STEPS	POTENTIAL HAZARDS - CONSEQUENCES
Dealing with confrontational or aggressive behavior	<ul style="list-style-type: none"> • Combative / aggressive behavior • Aggressive behavior with weapon • Physical contact / injury • Saliva / respiratory droplet exposure
PROCESS AND CONTROLS (SAFEGUARDS)	
<ol style="list-style-type: none"> 1. Do not confront the individual verbally or physically. 2. Leave area and call 9-1-1 and provide location and physical description of individuals. Note that those on the Seattle campus must ask the dispatcher to route their call to UWPD. 	

TASKS/STEPS	POTENTIAL HAZARDS - CONSEQUENCES
<p>Drug item cleanup Pipes, glass items, pills, powders, marijuana, foil, straws, ends of marijuana joints, bongs, etc.</p>  <p>Visible, loose drugs and 1-inch bags</p> 	<ul style="list-style-type: none"> • Potential drug residue exposure • Broken glass (sharps)
PROCESS AND CONTROLS (SAFEGUARDS)	
<p>Step 1: Photo A</p>  <p>Photo B</p>  <p>Step 2: Photo C</p> 	<ol style="list-style-type: none"> 1. Open trash bag and place in bucket (refer to photo A & B). 2. Open additional trash bag and place in first trash bag so that there is now an open double bag system in the bucket (refer to photo C). 3. Always use trash grabber to separate items: sharps/broken glass to sharps container, prescription drugs, non-sharps drug paraphernalia, etc. to the inner 6 mil trash bag in 5 gallon bucket. 4. Intact prescription bottles with contents shall be inserted into gallon Ziploc bag, sealed, and disposed of in the medication bin at the UWPD station. 5. Avoid performing tasks or operations that may potentially cause drug products to become airborne (for example, only pour water on materials to be cleaned up. DO NOT SPRAY) by using hydrogen peroxide wet wipes. Do not use alcohol-based wipes because alcohol has a potential to increase skin absorption. 6. Carefully place the wet wipe on the powder to be removed, containing as much of the powder as possible, and dispose of into inner 6mil bag. Use as many wipes as necessary. 7. Once most, if not all, of the powder is removed, wet the contaminated area and apply absorbent pad or paper towel. Repeat until all visible drug and liquid is absorbed.

Step 8:
Absorbent Pads



Step 11:
Photo D






Step 12:
Photo E




8. Dispose of absorbent pad(s) or paper towels into inner 6mil bag.
9. If wearing rubber boots without booties, apply Ecolab Peroxide Multi Surface Cleaner and Disinfectant to the bottom soles of the rubber boots.
10. Wait for 30 seconds (wet contact time) standing on a clean surface.
11. Once clean-up is complete, dispose of *outer* pair of gloves and disposable coveralls (and any other disposable PPE) into the inner 6mil bag. Tie off inner bag with duct tape (refer to photo D). Then dispose of gloves into outer bag that contains the tied-off inner bag.
12. Don clean pair of nitrile gloves and tie off outer bag and transport the bag(s) by bucket (clean/disinfect outer portion of the bucket used in clean up before transport or use a second clean bucket) (refer to photo E), toter, or vehicle and dispose of bag directly in compactor dumpster, not in an inside building trash container.
13. Bag grabbers/scooper tools/contaminated bucket (if not already cleaned onsite). Wash tools (including inside and outside of bucket) with soap and water before storage.
14. Remove gloves and wash hands thoroughly with soap and cool water and before eating, drinking, smoking or using the restroom. **DO NOT USE HAND SANITIZERS³.**
15. Remove and wash goggles with soap and water then dry.

TASKS/STEPS	POTENTIAL HAZARDS - CONSEQUENCES
Drug odors / residual aerosols	<ul style="list-style-type: none"> Potential inhalation hazard
PROCESS AND CONTROLS (SAFEGUARDS)	
<p>If odors from drug use are present, if possible, wait to clean the area until natural ventilation has cleared the area. If it's a high traffic/high use area and it cannot wait, wear a disposable charcoal impregnated N95 respirator while working in the area.⁴</p>	

TASKS/STEPS	POTENTIAL HAZARDS - CONSEQUENCES
<p>Evidence of drug manufacturing</p> <div style="display: flex; justify-content: space-around;">    </div>	<ul style="list-style-type: none"> Potential hazardous chemical exposure
PROCESS AND CONTROLS (SAFEGUARDS)	
<p>If any of the following from potentially illicit drug manufacturing are present: propane tanks⁵, or other compressed gas cylinders, specialized glassware, unmarked containers with visible unknown chemicals, pill press, etc.:</p> <ol style="list-style-type: none"> a. Call UWPD at (206) 543-0507 to assess, pick up, etc. b. Notify your supervisor to determine if approved contractor should provide clean-up services.* <p>*Ensure that UWPD has been notified that cleanup will occur and is provided the opportunity to investigate if they wish to do so.</p>	

TASKS/STEPS	POTENTIAL HAZARDS - CONSEQUENCES
<p>In case of exposure (inhalation, skin contact, clothing contact, etc.)</p>	<ul style="list-style-type: none"> • Inhalation hazard • Contact hazard
PROCESS AND CONTROLS (SAFEGUARDS)	
<p>With any of these situations, contact your supervisor FIRST:</p> <ol style="list-style-type: none"> 1. If visible smoke or a strong drug or chemical odor is present, wait until local ventilation clears the air. If feeling unwell due to possible exposure, notify your supervisor and seek medical attention. 2. If any skin contact with suspected unused drug powder or material, use soap and water to thoroughly wash the affected skin. Do not use alcohol-based sanitizer. 3. <u>If not wearing protective clothing (Tyvek or gown) and your personal clothing becomes contaminated:</u> <ol style="list-style-type: none"> a. <u>Do not leave the area</u> a. Contact the Regulated Materials office (206) 685-3357 to provide you a portable enclosure/shower. b. Remove all clothing that may have contacted drugs. Carefully place clothing in a durable 6 mil polyethylene bag and submit to RMO IH for disposal. Do not take contaminated clothing home. c. Shower, then change into a durable Tyvek suit that will be provided to you. d. Coordinate with supervisor to seek medical assistance/consultation. e. Submit an OARS report 	

TASKS/STEPS	POTENTIAL HAZARDS - CONSEQUENCES
<p>Sharps (hypodermic needles, syringes)</p>	<ul style="list-style-type: none"> • Potential needle stick
PROCESS AND CONTROLS (SAFEGUARDS)	
<p>Refer to "UW Facilities Procedure for Human Waste and Sharps Clean-up"</p>	

Required PPE	
<ul style="list-style-type: none"> • Nitrile gloves (6 mil) • Safety goggles • Tyvek (or other disposable) coveralls • Disposable booties • Disposable N95 respirator (or N, P, R-100 facepiece respirator)-, or disposable charcoal impregnated N95 respirator, as appropriate • Substantial footwear worn with booties, if risk of contamination • Rubber boots (booties optional) 	
Supplies	
<ul style="list-style-type: none"> • Duct tape • 6 mil Large Trash bags • One 5-gallon bucket (two if using one for clean transport) • Gallon Ziploc bags (only for disposal of prescription drugs) • Paper towels • Water for rinsing • Absorbent pads (similar to laboratory spill kits) • Hydrogen Peroxide wet wipes • Ecolab Peroxide Multi Surface Cleaner & Disinfectant • Trash grabber • Metal long-handled flat-blade shovel or disposable long-handled scoops 	

I certify a workplace hazard assessment was completed for this task.

Supervisor signature: _____

References:

1. OSHA PPE standard ([29 CFR 1910.132](#)) and respiratory protection standard ([29 CFR 1910.134](#))
2. [NIOSH Standard Safe Operation Procedures](#)
3. NIOSH + other regulatory agencies' [Safety Recommendations for First Responders](#)
4. [Public Health Insider-Seattle & King County](#)
5. OSHA's hazardous materials standard ([29 CFR 1910.120](#))
6. [L&I Hazardous Waste](#)

Additional information:

- [Facts about Fentanyl \(dea.gov\)](#)
- [Facts about Fentanyl Exposure \(science.org\)](#)
- [L&I respiratory standard \(WAC 296-842\)](#)

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Revision 2

