

COVID-19 RESPONSE

SANITATION & HYGIENE REGULATIONS



INTRODUCTION

INTRODUCTION

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INTRODUCTION

TOPICS

- Bodies of Law
- Who Regulations Apply To
- General Sanitation
- Dispensaries
- Cultivation Facilities
- Production Facilities
- COVID-19 Protection

BODIES OF LAW

BODIES OF LAW

- **FEDERAL**

- **OSHA** Highlights, topic covered by another class

- **STATE**

- **NRS and NAC** Focus of this class

- **LOCAL**

- **May have additional requirements** including Health Dept

BODIES OF LAW

- **FEDERAL**

- **OSHA**

- OSHA's Mission: "To assure safe and healthful conditions for working men and women by setting and enforcing standards and providing training, outreach, education and compliance assistance.
 - As the industry continues to grow, OSHA inspectors are beginning to focus on cannabis facilities, so be prepared.

BODIES OF LAW

- **FEDERAL**

- **OSHA (continued)**

- **Cannabis Employers Responsibility under OSHA (including but not limited to):**

- Provide a workplace free from recognized hazards and comply with OSHA standards.
- Provide training required by OSHA standards
- Keep records of injuries and illnesses
- Provide medical exams when required by OSHA standards and provide workers access to their exposure and medical records
- Not discriminate against workers who exercise their rights under the Act
- Post OSHA citations and hazard correction notices
- Provide and pay for most PPE
- Report each worker death to OSHA
- Report each work-related hospitalization, amputation, or loss of an eye
- Maintain injury and illnesses records
- Inform workers how to report an injury or illness to the employer
- Make records available to workers
- Allow OSHA access to records
- Post annual summary of injuries and illnesses

BODIES OF LAW

- **STATE**
 - **Nevada Revised Statutes** covers more general topics
 - **Nevada Administrative Code** more detailed and will include any sanitation/hygiene requirements in NRS
 - **General Facility Sanitation**

BODIES OF LAW

- **LOCAL**

- Local governments may require work card (example: City of Las Vegas)
- Local Governments must inspect/approve facility prior to opening, may require health district inspection
- Health district may require education for production facility agents

POLICIES AND PROCEDURES

POLICIES AND PROCEDURES

- **Who is Responsible?**
- **Policies and Procedures**
- **Physical Building Requirements**
- **Schedules and Logs**
- **Cleaning Agents**

POLICIES AND PROCEDURES

- **Must record and describe in sufficient detail:**
 - Responsibility
 - Cleaning schedules
 - Methods of cleaning
 - Equipment used for cleaning
 - Materials used for cleaning

POLICIES AND PROCEDURES

Responsibility

- Must assign in writing who is responsible.
- Sanitation procedures apply to contractors and temporary employees as well as full-time

POLICIES AND PROCEDURES

Cleaning Schedules

- What should be covered in the schedule
- Where they should be placed
- Maintaining the schedules
- What to expect during an inspection

POLICIES AND PROCEDURES

Methods of Cleaning

- **Must be covered in SOPs**
- **Must be followed**
- **Examples:**
 - Powerwashing
 - Mopping

POLICIES AND PROCEDURES

Cleaning Equipment

- **Must be covered in SOPs**
- **Must be followed**
- **Examples:**
 - Powerwash equipment
 - Dishwashers

POLICIES AND PROCEDURES

Cleaning Materials

- **Must be covered in SOPs**
- **Must be followed**
- **Examples:**
 - Bucket or spray bottle
 - Type of mop

POLICIES AND PROCEDURES

-icides & Cleaning Agents

- Each establishment must have policies for appropriate use of rodenticides, insecticides, fungicides, fumigating agents, and cleaning and sanitizing agents.
- Policy could be that establishment does not use rodenticides, etc., but must have a policy and follow it.

POLICIES AND PROCEDURES

Buckets and Spray Bottles

- Keep sanitizer in bucket or spray bottle
- Must be labeled
- Concentration allowed by regulation
- Test strips should always be available

POLICIES AND PROCEDURES

Bathroom - General

- At least one toilet per facility
 - Flushable toilet
 - Mounted toilet tissue
 - Hand sink- 100 degrees F
 - Soap in dispenser
 - Paper towels in dispenser
 - Trash can conveniently located

POLICIES AND PROCEDURES

Sinks - General

- Every facility must have a handwashing sink that is not in a bathroom or near where edibles are cooked or prepared
- Water must reach **100 degrees F**

POLICIES AND PROCEDURES

Physical Facility - General

- Suitable size to prevent contamination
- Adequate space to keep organized and prevent contamination
- Cannot contain wood surfaces (*exception for dispensaries) unless sealed and coated with epoxy that renders surface: safe, durable, non-absorbent, non-corrosive, easy to clean, resistant to chipping, cracking etc.
- Constructed so surfaces don't cause contamination (no absorption, reactive, etc.)

POLICIES AND PROCEDURES

Physical Facility - General (continued)

- Operations must be conducted in defined area of adequate size
- All items must be stored at least 6 inches off the ground
- All access points sealed, including by use of door sweeps
- Defined areas or operations controls to prevent contamination:
 - Receipt, identification of components
 - Hold rejected, quarantine
 - Store approved
 - Testing facility procedures
 - Sanitary processing

POLICIES AND PROCEDURES

Cleaning Schedules

- **Each facility maintains cleaning schedules** for the facility and equipment. Be sure to log your cleaning activities and ensure these schedules are actually being utilized and maintained.
- **Notify management** if cleaning schedules are not being followed or, if they are being followed, but more cleaning is necessary.

POLICIES AND PROCEDURES

Equipment and Utensils

- Equipment and utensils must be cleaned as appropriate for nature of use
- Must be cleaned, sterilized at appropriate intervals
- Must not change the safety, identity, strength, quality or purity of mj or mj products
- Substances or lubricants, similarly, must not come in contact with mj or mj products if it would change safety, quality, purity, etc.

POLICIES AND PROCEDURES

Sanitary Process - General

- **Sanitary processing:**
 - Floors, walls, ceilings smooth hard surface, easy to clean
 - Temp and humidity controls- working
 - Air filtered through positive pressure
 - System for monitoring enviro conditions
 - System for cleaning rooms and equipment
 - Maintaining any equipment used to maintain sanitary conditions

POLICIES AND PROCEDURES

Flow of “Stuff” - General

- The flow of components, product containers, closures, labels, in-process materials and marijuana and marijuana products through any building used to manufacture, process, package or hold marijuana or marijuana products is designed to prevent contamination.

POLICIES AND PROCEDURES

Storage - General

- **Marijuana products must be protected from contamination by storing the product in:**
 - Clean, dry location
 - Products cannot be exposed to:
 - Splashes
 - Dust
 - Other contamination
 - 6 inches or more above the floor.

POLICIES AND PROCEDURES

Filtration - General

- **Each establishment must have:**
 - Adequate ventilation
 - Equipment for adequate control over microorganisms, dust, etc.
 - Filtration system including pre-filters and particulate matter

POLICIES AND PROCEDURES

Potable Water

- **Continuous positive pressure**
- **Plumbing system free of defects that could contaminate**
- **Comply with Primary Drinking Water Regulations, 40 C.F.R. Part 141**

POLICIES AND PROCEDURES

Drains

- Adequate size, and
- Where connected to a sewer- air break or device to prevent back-siphonage

POLICIES AND PROCEDURES

State of Repair

- **All establishments must be maintained in a good state of repair at all times.**

POLICIES AND PROCEDURES

Waste

- **Render waste containing marijuana unusable before the waste leaves the marijuana establishment.**
 - Unless another method approved by the Department is used, waste containing marijuana must be rendered unusable by grinding and incorporating the waste with compostable or non-compostable mixed waste.

POLICIES AND PROCEDURES

Waste Notification

- A marijuana establishment shall provide notice to the Department using the seed-to-sale tracking system before rendering unusable and disposing of marijuana or marijuana products.
 - Salvaged products may only be used for extraction

DISPENSARY SPECIFIC POLICIES

DISPENSARY SPECIFIC POLICIES

- **Dispensaries**

May contain wood surfaces without same restrictions as cultivation or production, but all products must remain in packaging at all times if dispensary contains wood surfaces.

CULTIVATION SPECIFIC POLICIES

CULTIVATION SPECIFIC POLICIES

Cultivation

- **Must retain certified applicator for pesticides.**
- **Authorization differs by indoor versus outdoor cultivation**

PRODUCTION SPECIFIC POLICIES

PRODUCTION SPECIFIC POLICIES

Production

- **Person In Charge** Demonstrate knowledge
- **Compliance**
- **Ensuring 1 person is a certified food protection manager**
 - Listed by appropriate accrediting agency or
 - Provides training acceptable by Department
- **Responds correctly to inspector questions (list in regs)**
- **Non-marijuana ingredients:**
 - Must come from sources that comply with state and federal law.
 - Cannot come from a private home.

PRODUCTION SPECIFIC POLICIES

Production (continued)

- **Cross-contamination of marijuana and ingredients:**
 - Keep raw ingredients separated, different areas
 - Use separate equipment for raw ingredients
 - Prepare raw ingredients at separate times
 - Store and prep raw ingredients in manner that prevents cross-contamination

See regulations for further rules on food prep, storage, etc.

PRODUCTION SPECIFIC POLICIES

Production (continued)

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PRODUCTION SPECIFIC POLICIES

Contamination Prevention

Marijuana products and direct contact surfaces of equipment and utensils must be stored and handled in a manner that prevents any biological, chemical or physical contamination at all times.

PRODUCTION SPECIFIC POLICIES

Contamination Prevention (continued)

- Raw eggs replaced with pasteurized eggs
- Ingredients only have contact with clean surfaces/equipment or single-use articles that haven't been used
- Correct temperatures used for cooking, refrigerating, thawing, etc. (see sec. 165 of Permanent Regulations)

PRODUCTION SPECIFIC POLICIES

Potentially Hazardous Material

- Must be date-marked
- Must be discarded after 7 days or after 7 days from the time thawed

See Sec 166 of permanent regulations for further detail on storage, consumption, and prep of potentially hazardous material

PRODUCTION SPECIFIC POLICIES

Perishable Marijuana Products

- Expiration determined by shelf-life testing
- Default is 7 days
- New testing required for any change in:
- Recipe
- Production run size
- Equipment used to produce

PRODUCTION SPECIFIC POLICIES

Materials for *construction* of equipment and utensils

- Do not allow the migration of deleterious substances or impart colors, odors or tastes to marijuana products; and
- Under normal use conditions are:
 - Safe;
 - Durable, corrosion-resistant and nonabsorbent;
 - Sufficient in weight and thickness to withstand repeated warewashing;
 - Finished to have a smooth, easily cleanable surface; and
 - Resistant to pitting, chipping, crazing, scratching, scoring, distortion and decomposition.

PRODUCTION SPECIFIC POLICIES

Production Facility Sinks

- Sink with at least three compartments for manually washing, rinsing and sanitizing
- equipment and utensils;
- Sink compartments that are large enough to accommodate immersion of the largest equipment and utensils; and
- Running water that reaches a minimum temperature of 120°F (49° C).

If equipment or utensils are too large for the warewashing sink, a marijuana product manufacturing facility must use a warewashing machine or alternative equipment.

PRODUCTION SPECIFIC POLICIES

Cleaning of Surfaces of Equipment and Utensils in Direct Contact with Marijuana:

- Before switching to different type of raw animal ingredient (e.g. beef, pork or poultry);
- When changing from raw to finished marijuana;
- Between uses with raw fruits and vegetables
- If dealing with potentially hazardous marijuana products and ingredients (always using appropriate time and temp controls);
- At any time during operation when contamination may have occurred; and
- In Equipment(Ice bins, ice makers, cooking oil storage bins):
 - Manufacturer specs; or
 - Frequency to avoid soil or mold.

PRODUCTION SPECIFIC POLICIES

Cleaning of Surfaces of Equipment and Utensils in Direct Contact with Marijuana (continued):

- **Cleaned adequately throughout the day:**
 - Washed
 - Rinsed
 - Sanitized
- **At least once every four hours**

After cleaning, surfaces of equipment and utensils must be sanitized in specific manners covered by regulation (Section 174).

PRODUCTION SPECIFIC POLICIES

**Cleaning Surfaces of Cooking and Baking Equipment
in Direct Contact with Marijuana:**

MUST BE CLEANED EVERY 24 HOURS

PRODUCTION SPECIFIC POLICIES

Cleaning the Cavities and Door Seals of Microwave Ovens:

**MUST BE CLEANED AT LEAST ONCE EVERY
24 HOURS BY USING THE RECOMMENDED
CLEANING PROCEDURE OF THE
MANUFACTURER.**

PRODUCTION SPECIFIC POLICIES

Other Topics Related to Sanitation Covered by Regulations:

- Lighting intensity (section 176)
- Ventilation (section 170)
- Mechanical ventilation (section 177)
- Filters (section 178)

CLEANING AGENTS

CLEANING AGENTS

Requirements

- **Must use chlorine, iodine, or quaternary ammonium**
- **If use something else, must be in accordance with EPA and approved by Taxation**
- **Must be at regulated concentration**

CLEANING AGENTS

Requirements (continued)

- **Chlorine** Between 50 parts per million and 100 parts per million or be otherwise prepared in accordance with the manufacturer's label.
- **Iodine** Between 12.5 parts per million and 25 parts per million.
- **Quaternary ammonium** 200 parts per million or be otherwise prepared in accordance with the manufacturer's label.
- **Must have bucket or spray bottle available at all times with testing strips to establish at proper concentration**

CLEANING AGENTS

Requirements (continued)

- **Chemical sanitizer must be available:**
 - For immediate use
 - At all times
 - Proper concentration
 - Somewhere other than 3-compartment sink

GENERAL EMPLOYEE HYGIENE

GENERAL EMPLOYEE HYGIENE

Recap

- **MINIMUM HYGIENE REQUIREMENTS:**
 - Arrive to work in clean clothing appropriate for your duties
 - Wear protective apparel, as necessary, to prevent contamination
 - Follow hand-washing procedures

GENERAL EMPLOYEE HYGIENE

When to Wash Hands

- 1. Immediately upon entrance to any area containing marijuana or marijuana products;**
- 2. Immediately before working with marijuana plants;**
- 3. Immediately before engaging in preparation for the extraction of concentrated marijuana or production of marijuana products, including, without limitation, working with exposed marijuana products, clean equipment and utensils and unwrapped single-service and single-use articles;**
- 4. After touching bare human body parts other than clean hands and exposed portions of arms, including, without limitation, surrogate prosthetic devices for hands and arms;**
- 5. After using the toilet room;**
- 6. After coughing, sneezing, using a handkerchief or disposable tissue, using tobacco, eating or drinking;**

GENERAL EMPLOYEE HYGIENE

When to Wash Hands (continued)

7. **After handling soiled equipment or utensils;**
8. **During preparation for the extraction of concentrated marijuana or production of marijuana products, as often as necessary to remove soil and contamination and to prevent cross-contamination when changing tasks;**
9. **When switching between working with unprocessed marijuana products or uncooked food products and working with finished concentrated marijuana or marijuana products;**
10. **Before donning gloves for working with marijuana products; and**
11. **After engaging in other activities that contaminate the hands.**

GENERAL EMPLOYEE HYGIENE

How to Wash Hands

- 1. Rinse under clean, running warm water.**
- 2. Apply an amount of cleaning compound recommended by the manufacturer of the cleaning compound.**
- 3. In a sink appropriately equipped**
- 4. In water at least 100 Degrees F**
- 5. Rub together vigorously for at least 20 seconds while:**
 - a. Paying particular attention to removing dirt or other contaminants from underneath the fingernails during the cleaning procedure**
 - b. Creating friction on the surfaces of the hands and arms, fingertips and areas between the fingers**
- 6. Thoroughly rinse under clean, running warm water.**
- 7. Immediately follow the cleaning procedure with thorough drying.**

GENERAL EMPLOYEE HYGIENE

Health Conditions

- **Designated Person** If determined health condition may adversely affect safety or quality of marijuana, then prohibited from contact with it or equipment until person designated says otherwise.
- **Illnesses** Shall not work directly with marijuana:
 - A symptom of gastrointestinal infection (diarrhea, vomiting or jaundice);
 - A sore throat with fever; or
 - A lesion that appears inflamed or contains pus, including, without limitation, a boil or infected wound that is not covered with:
 - An impermeable cover and a single-use glove if the lesion is on a hand or wrist, both of which must be changed at any time that hand washing is required;
 - An impermeable cover if the lesion is on an arm; or
 - A dry, durable, tight-fitting bandage if the lesion is on another part of the body.

GENERAL EMPLOYEE HYGIENE

Health Hazards

- Events that are considered to be immediate health hazards/require reporting:
 - Interruption of electrical service;
 - Lack of potable water or hot water;
 - Grossly unsanitary occurrences or conditions including (pest infestation or sewage or liquid waste not being disposed of in an approved manner;
 - Lack of adequate refrigeration;
 - Lack of adequate toilet and hand-washing facilities for employees;
 - Misuse of poisonous or toxic materials;
 - A suspected outbreak of foodborne illness;
 - A fire or flood; or (i) Any other condition or circumstance which endangers public health.

GENERAL EMPLOYEE HYGIENE

Production Specific

- **Production Agent** Shall not have contact with finished marijuana products with his or her bare hands and shall minimize contact in general with unfinished products.
- **Shall use suitable utensils, including:** deli tissue, spatulas, tongs, single-use gloves or dispensing equipment when handling exposed, finished concentrated marijuana or marijuana products.

GENERAL EMPLOYEE HYGIENE

Production Specific

- **Production Agent Must:**
 - Keep his or her fingernails trimmed, filed and maintained so that the edges and surfaces are cleanable;
 - Unless wearing intact gloves in good repair, cannot have fingernail polish or artificial fingernails on his or her fingernails; and
 - Wear a hair net.

COMMON DEFICIENCIES

COMMON DEFICIENCIES

- **Toilet paper** or paper towels not mounted in a dispenser.
- **Hot water** from hand sinks not reaching the required 100°F.
- **Commercial scale** not certified or certification expired.



Paper towels not mounted



Hot water < 100°F



Scale last calibrated 7/2015

COMMON DEFICIENCIES

- **Employee food items** mixed with marijuana products in a dispensary refrigerator
- **Spray bottles** without labels
- **Air gaps** at drains



COMMON DEFICIENCIES

- **Unacceptable** sample jars
- **Signs** of pests
- **Uncovered** packaging materials

WHAT HAPPENS?

WHAT HAPPENS?

Violations could resort in the following:

- **Notice of deficiency**
- **Plan of Correction**
- **Possible fine**
- **Could lead to suspension or revocation of agent card**
- **Could lead to suspension or revocation of license**

COVID-19 PROTECTION

HOW IT SPREADS



There is currently no vaccine to prevent coronavirus disease 2019 (COVID-19).

The best way to prevent illness is to avoid being exposed to this virus.

The virus is thought to spread mainly from person-to-person contact:

- Between people who are in close contact with one another (within about 6 feet).
- Through respiratory droplets produced when an infected person coughs or sneezes.
 - These droplets can land in the mouths or noses of people who are nearby or possibly be inhaled into the lungs.

HOW TO PROTECT YOURSELF



CLEAN YOUR HANDS OFTEN

- Wash your hands often with soap and water for at least 20 seconds, especially after you have been in a public place, or after blowing your nose, coughing, or sneezing.
- If soap and water are not readily available, use a hand sanitizer that contains at least 60% alcohol. Cover all surfaces of your hands and rub them together until they feel dry.
- Avoid touching your eyes, nose, and mouth with unwashed hands.

HOW TO PROTECT YOURSELF



AVOID CLOSE CONTACT

- Avoid close contact with people who are sick.
- Put distance between yourself and other people if COVID-19 is spreading in your community. This is especially important for people who are at higher risk of getting very sick.

HOW TO PROTECT OTHERS

STAY HOME IF YOU ARE SICK

- Stay home if you are sick, **except to get medical care.**



HOW TO PROTECT OTHERS



COVER COUGHS & SNEEZES

- **Cover your mouth and nose with a tissue** when you cough or sneeze or use the inside of your elbow.
- **Throw used tissues in the trash.**
- **Immediately wash your hands with soap and water for at least 20 seconds.** If soap and water are not readily available, clean your hands with a hand sanitizer that contains at least 60% alcohol.

HOW TO PROTECT OTHERS



WEAR A FACEMASK IF YOU ARE SICK

- **If you are sick, wear a facemask when you are around other people** (e.g., sharing a room or vehicle) and before you enter a healthcare provider's office. If you are not able to wear a facemask, then you should do your best to cover your coughs and sneezes, and people who are caring for you should wear a facemask if they enter your room.
- **If you are NOT sick, don't wear a facemask unless you are caring for someone who is sick** (and they are not able to wear a facemask). Facemasks should be saved for caregivers.

HOW TO PROTECT OTHERS



CLEAN AND DISINFECT

- **Clean AND disinfect frequently touched surfaces daily.** This includes tables, doorknobs, light switches, countertops, handles, desks, phones, keyboards, toilets, faucets, and sinks.
- **If surfaces are dirty, clean them.** Use detergent or soap and water prior to disinfection.

HOW TO PROTECT OTHERS



HOW TO DISINFECT

Most common EPA-registered household disinfectants will work. Use disinfectants appropriate for the surface. Options include:

- **Diluting your household bleach.**
 - To make a bleach solution, mix:
 - 5 tablespoons (1/3rd cup) bleach per gallon of water OR 4 teaspoons bleach per quart of water.

HOW TO PROTECT OTHERS



HOW TO DISINFECT

- Follow manufacturer's instructions for application and proper ventilation. Check to ensure the product is not past its expiration date. Never mix household bleach with ammonia or any other cleanser. Unexpired household bleach will be effective against coronaviruses when properly diluted.

HOW TO PROTECT OTHERS



HOW TO DISINFECT

- **Use an alcohol solution**
 - Ensure solution has at least 70% alcohol.
- **Use another common, EPA-registered household disinfectant.**
 - Products with EPA-approved emerging viral pathogens claims are expected to be effective against COVID-19 based on data for harder to kill viruses.
 - Follow the manufacturer's instructions for all cleaning and disinfection products (e.g., concentration, application method and contact time, etc.).

WHAT TO DO IF YOU ARE SICK



- Stay home except to get medical care
- Separate yourself from other people and animals in your home
- Call ahead before visiting your doctor
- Wear a facemask
- Cover your coughs and sneezes
- Clean your hands often
- Avoid sharing personal household items
- Clean all “high-touch” surfaces everyday
- Monitor your symptoms
- Stay at home until instructed to leave
 - The decision to discontinue home isolation precautions should be made on a case-by-case basis, in consultation with healthcare providers and state and local health departments.

STEPS FOR ESTABLISHMENTS TO TAKE



- Increase frequency of cleaning and disinfection.
- Add additional hand sanitizer stations throughout the establishment for employees and guests.
- Reinforce standard hygiene practices with employees.
- Implement robust internal employee communications programs that reinforce personal hygiene practices.

STEPS FOR ESTABLISHMENTS TO TAKE



IF POSSIBLE:

- Perform deep sanitization of items used by guests.
- Consult an Environmental Specialist technician.
- Invest in advanced ventilation and filtration systems.

COVID-19 PROTECTION SOURCES

NEVADA RESORT ASSOCIATION

<https://www.nevadaresorts.org/coronavirus.php>

CENTERS FOR DISEASE CONTROL

<https://www.cdc.gov/coronavirus/>

QUESTIONS?

