

August 10, 2018

THCA Crystals/Diamonds

At this time, the Bureau of Fire Services (BFS) has not reviewed an approved method for producing a marijuana product referred to as “THCA Crystals” or “Diamonds” in a safe manner.

The Bureau of Medical Marijuana Regulation’s Emergency Rules requires processors to comply with the National Fire Protection Association (NFPA) 1, 2018 Edition. Sections of NFPA 1 require that the process and systems used for the extraction of marijuana/cannabis oils must be performed using approved and listed equipment. In the absence of a listing, NFPA 1 requires a registered design professional to document the processes and equipment to be used and submit that information to the Bureau of Fire Services (BFS) and local fire department for approval. It also requires field verification of the equipment and documented training of personnel who will use the equipment prior to any processing or production.

The Bureau of Medical Marijuana Regulation (BMMR) is not aware of any listed equipment for that purpose that would not require an accompanying technical report in compliance with NFPA 1. If an applicant believes they have an acceptable and approved process, they must submit the documentation to BFS at LARA-BFS-Marijuana@michigan.gov prior to creating THCA Crystals/Diamonds.

The THCA Crystals/Diamonds creation process observed in Michigan involves the building up of flammable gases under pressure. There is a significant potential for injury to persons, or damage to property, if an approved process is not followed. These gases must be released in a controlled and consistent manner, within a closed loop system, to capture released gases. Utilization of a hood system is not an acceptable means of controlling the flammable vapors.

Applicants and licensed processors performing unapproved extraction methods – including the currently unapproved processes to create THCA Crystals/Diamonds – will be referred to the LARA-BMMR Enforcement Section for investigation and inspection. This may result in sanctions, including, but not limited to, license denial, limitation, fines, revocation, suspension, nonrenewal, administrative holds, and orders to cease operations. Questions can be sent to the Bureau of Medical Marijuana Enforcement Section via email at LARA-BMMR-Enforcement@michigan.gov.