

State of Idaho
Department of Environmental Quality
& Public Health Districts

Memorandum

To: Idaho Landfill Owners/Operators
From: Dean Ehlert, Solid Waste Program Coordinator
Subject: Special Waste Management Plan Guidance
Bovine Spongiform Encephalopathy Issues

Date: January 9, 2004

The Bovine Spongiform Encephalopathy (BSE) issue in Washington has presented an unusual solid waste disposal issue and will require District Health Department approval of special waste management plans for disposal of whole animals, animal parts, offal, and potentially packaged meat recalled as a result of the BSE incident. The local District Health Departments will only consider modifying special waste management plans for this purpose if the facility is a lined Subtitle D landfill with adequate operating facilities to manage a large volume of animal carcasses or offal.

At a minimum, special waste management plans should address and include the following issues prior to submittal to the appropriate District Health Department for review:

1. Delivery of whole animals, animal parts, offal, or recalled meat shall be by appointment only so the landfill is prepared to immediately deal with disposal of the delivered waste. In all cases, these materials shall be placed on a minimum of 20 feet of in-place solid waste. In the case of whole animals, it is more desirable to have them delivered to the landfill live and euthanized on site. Depending on the method used to euthanize the animals, it is recommended law enforcement official or veterinarian observes this process.
2. Whole animals shall only be disposed one carcass-layer thick. They shall be immediately covered with at least three feet of regular garbage.
3. Offal shall be placed on a 12-inch layer of District Health Department-approved absorbent material such as a dry pulp sludge or soil. In certain cases municipal solid waste may be able to be utilized as absorbent material. The offal shall be immediately covered with at least three feet of regular garbage.
4. Large quantities of recalled meat (typically shipped from central locations) shall be placed on in-place garbage and immediately covered with at least three feet of regular garbage.
5. The disposal area for any of these wastes shall be covered with a minimum of twelve inches of soil at the end of the operating day. DEQ approved Alternative Daily Cover (ADC) materials cannot be utilized as a soil substitute to cover this material at the end of the operating day.
6. Special attention to vector control during waste disposal operations is necessary to prevent vector contact with potentially contaminated carcasses, meat or offal.
7. The general public should be excluded from the disposal area until daily cover is placed over infected waste.
8. Landfill equipment should not come into direct contact with infected waste. Cover material should be pushed over waste.
9. Notify the Department and appropriate District Health Department of receipt of infected meat, offal or animals.
10. Accurate records of the burial activities shall be made apart of the operating record. Animals or infected material should be buried according to ownership in case of future litigation.

The Department may revise these Special Waste Management Plan guidelines based on new information provided during the course of this unusual disposal event. This guidance is consistent with guidance in the state of Oregon and Washington.