

State of Idaho
Department of Environmental Quality
& Public Health Districts

Memorandum

To: Idaho Landfill Owners/Operators **Date:** January 3, 2020

From: Matthew Beeter, Solid Waste Program Manager, Idaho Department of Environmental Quality (DEQ)

Subject: Special Waste Management Plans for acceptance of materials contaminated with transmissible spongiform encephalopathies (TSE), including Chronic Wasting Disease (CWD), Scrapie and Bovine Spongiform Encephalopathy (BSE or “Mad Cow”)

Prior to accepting whole animals, animal parts, offal, packaged/recalled products, or other materials contaminated with CWD, BSE, Scrapie or another TSE, facilities should seek approval of a special waste management plan from the appropriate Public Health District. The most appropriate facility type for disposal of TSE wastes are within a lined Subtitle D landfill with no uncontrolled releases, and no leachate disposal at a wastewater treatment plant or through an NPDES discharge permit. Public Health Districts should coordinate closely with DEQ prior to plan approval if such a facility is not reasonably available. An approved special waste management plan becomes part of the facility operating plan and should be added to the facility operating record.

At a minimum, special waste management plans proposing the acceptance of TSE wastes into a municipal landfill cell should address the following:

1. Delivery of whole animals, animal parts, offal, packaged/recalled products, or other contaminated wastes 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 if possible. Depending on the method used to euthanize the animals, it is recommended that a law enforcement official or veterinarian observe this process.
2. Whole animals shall only be disposed one carcass-layer thick. They shall be immediately covered with at least three feet of municipal solid waste.
3. Offal shall be placed on a 12-inch layer of Public Health District-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 packaged/recalled products (typically shipped from central locations) shall be placed on in-place municipal solid waste and immediately covered with at least three feet of additional municipal solid waste.
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 immediately.
9. Notify DEQ and appropriate Public Health District of receipt of infected meat, offal or animals.
10. Accurate records of the burial activities, including vertical and horizontal location, volume, and source, shall be made a part of the operating record so that disturbances of the burial site can be avoided. When possible animals or infected material should be buried according to its source/location of origin in case it becomes necessary to track disease origins.
11. When possible, burial locations should have signage or otherwise marked to indicate that digging/disturbance of the area is restricted. This is especially important if the approved burial area is outside the perimeter of a municipal landfill disposal cell.
12. DEQ and the Public Health District should be notified in advance of any activity that will disturb these burial areas, including landfill expansions, installation of gas collection equipment, landfill mining or physical landfill investigations.
13. After acceptance of any TSE waste, a facility should provide notice to any person or entity receiving leachate for off-site disposal or discharge, and a copy of the notice should be sent to DEQ and the Public Health District.

More specific information on minimizing gas formation and controlling liquids from TSE waste can be found in the November 2004 Revision of EPA's Memorandum on Recommended Interim Practices for Disposal of Potentially Contaminated CWD Carcasses and Waste. Other waste management methods or locations that are demonstrated to be equally protective of human health and the environment may be considered. DEQ and the Public Health Districts may revise these management and disposal guidelines based on new information, or in order to maintain consistency with guidance in surrounding states. Other disposal methods, such as high temperature incineration at a permitted facility, may be preferred if available. Contact DEQ or the Public Health District for more information.