

INFECTIOUS WASTE NEWSLETTER
DIVISION OF SOLID AND INFECTIOUS WASTE MANAGEMENT
OHIO ENVIRONMENTAL PROTECTION AGENCY

ANIMAL CARCASS DISPOSAL

The following are examples of entities that either produce or are responsible for handling animal carcasses or parts thereof: research facilities, veterinarians; animal control specialists; department of transportation; animal humane society, slaughter houses; farmers; and the homeowner. Hence, the proper disposal of animal carcasses is of general concern due to regulations, disposal costs, aesthetic reasons, and health questions.

General

In general, disposal of animal carcasses not infected with an infectious agent that is transmissible to humans are a solid waste. Animal carcasses may be disposed or handled in the following ways: taken to a licensed landfill; by incineration at a licensed incineration facility; composting at a Class I facility; or rendered at a facility licensed under ORC Chapter 953. However, there may be exceptions under specific conditions.

Under the authority of ORC Chapter 941. (Ohio Dept. of Agriculture (ODA)), carcasses may be disposed by burying at a minimum depth of 4 feet, burning, or rendering. However, it is the position of DSIWM that carcasses produced as a result of doing business are indeed a waste stream of the business. Hence, disposing of such a waste stream by burial or open burning must be in compliance with the solid waste regulations.

Single-Family Residence

If permitted by local health codes, pets and wild animals may be buried on the owner's residence, since solid wastes disposed on the premises of a single-family residence where generated are exempt from the solid waste regulations. The owner of the premises where a

wild animal is destroyed is considered the owner of the wild animal, hence, the animal may be buried on the premises in accordance with ODA regulations. Pets and wild animals may also be placed in the home owner's trash. In addition, pets, but not wild animals, may be disposed at a pet cemetery operated in compliance with ORC Chapter 961.

Business Entities

Entities such as the ODOT, animal humane society, and wildlife control specialists are required to handle animal carcasses in accordance with the solid waste regulations. Carcasses may not be disposed by burying on the premises of the business, or any other location except that specified for homeowners. Such burial may constitute operating a landfill without a permit-to-install or license. Furthermore, the business may not dispose of the carcasses by open burning.

Infectious Waste

Animal carcasses suspected of being infected, intentionally or otherwise, with an infectious agent that is transmissible to humans are to be disposed in accordance with the infectious waste regulations. Examples of diseases which may be harbored by animals and transmissible to humans include: rabies, anthrax, brucellosis, tularemia, and yellow fever.

Carcasses of suspected rabid animals, from which the head has been removed for diagnosis, may be handled as solid waste. The virus which causes rabies concentrates in the salivary glands and brain tissues of the animal, hence, the severed head of a suspected rabid animal must be handled as infectious waste but the carcass may be disposed as solid waste.

Livestock

The disposal of diseased livestock is

governed by the ODA under the authority of ORC Chapter 941. Diseased livestock and dead animals found on a premises may be buried on the premises at a minimum depth of 4 feet, burned, or rendered. The composting of livestock is not a permitted disposal method under ORC Chapter 941.

Veterinarians

Veterinarians who are small infectious waste generators may dispose of animal carcasses infected with agents transmissible to humans in the same manner as solid wastes per OAC Rule 3745-27-30. Therefore, these carcasses may be landfilled, incinerated, or rendered. Veterinarians who are large infectious waste generators must dispose of infected carcasses by either an approved infectious waste treatment method or by rendering in accordance with ORC Chapter 953.

If requested by the owner of the animal, it is permissible for a veterinarian to return an animal carcass to the owner.

CREMATORIES THAT BURN IW

Crematories are exempt from infectious waste treatment facility licensing and permitting requirements IF they fulfill all the requirements of the exemption, ORC Division (C)(6) Section 3734.021:

"Infectious wastes may be treated at a facility that holds a license issued under section 4717.17, and a permit issued under Chapter 3704. of the ORC to the extent that the treatment of those wastes is consistent with that permit and its terms and conditions. The rules adopted under Divisions (C)(2) and (4) of this section do not apply to a facility holding such a license and permit."

The exemption appears straight forward

until the complexities of the air permit are considered.

Although the regulations imposed by the Division of Air Pollution Control (DAPC) are not enforceable by health department and DSIWM personnel, it is important to be aware of the requirements. Thus, air issues are presented below. If a air violation is suspected at a facility, please contact the air local in your area.

Crematories may treat infectious waste IF:

* holds license issued under 4717.17

The Board of Embalmers and Funeral Directors (BEFD) issues licenses under the authority of ORC Section 4717.17 to facilities that perform embalming and funeral services. A crematory on the premises of a funeral home fulfills the licensing requirement of the exemption.

BEFD does not have the authority to license crematories. Therefore, a free standing crematory would not be located at a facility licensed under ORC Section 4717.17. and hence, not fulfill the licensing requirement of the exemption. Such a facility is required to obtain a DSIWM PTI and an annual operating license.

* holds permit issued under ORC 3704.

This permit is issued by the Division of Air Pollution Control (DAPC). An air emissions source may be issued, by DAPC, a permit-to-operate (PTO) or a registration T status, in lieu of the PTO. A registration T status is an official authorization by DAPC to operate an air emissions source.

Per the information (type of materials and amounts being burnt at the facility) provided on the air PTO application, DAPC may determine that the emissions produced at the facility will not be significant and grant a registration T status to the facility. Under this registration, emissions testing (stack testing) is not required.

* to the extent that the treatment of those wastes (IW) is consistent with that permit and its terms and conditions.

A facility holding either a PTO or registration T status may burn only the types and amounts of materials listed in the terms and conditions of the PTO or, in the case of T status registration, those materials and amounts listed on the PTO application.

IW contains contaminated plastics, wovens, paper, glass, and metallic items which produce emissions quite a bit different from those emitted from burning human remains. A crematory which burns infectious wastes generated by other facilities may very well be violating their air PTO or registration T status due to the types and/or amount of waste being burned.

* What else applies?

Crematories that treat IW produced by other entities are exempt from the IW treatment facility permitting and licensing requirements and Paragraphs (B) and (C) (operational and quality control requirements) of OAC Rule 3745-27-32.

These facilities must still comply with all other applicable regulations pertaining to infectious waste treatment facilities including: approved method, spill containment and clean-up procedure, storage requirements, and shipping paper requirements for untreated waste received and the disposal of the ash.

Per the IW incinerator regulations imposed by DAPC, only those crematories that burn exclusively coffins and human remains are exempt from the IW incinerator regulations, OAC Chapter 3745-75-01 through 3745-75-06. Hence, a crematory that burns IW must comply with the DAPC'S IW incinerator regulations.

Summary, a crematory that doesn't have an IW PTI and license but burns IW must:

- * be a licensed funeral home
- * have a air PTO/registration T status
- * burn only those wastes and amounts specified on PTO/application
- * be in compliance with applicable portions of OAC Rule 3745-27-32
- * be in compliance with air IW incinerator regulations

Other Related Issues:

Is it permissible for crematories to accept surgically removed human remains without being considered as treating infectious waste?

Yes. As mentioned above the DAPC exempts incinerators that burn coffins and human remains. Likewise, DSIWM does not consider such items to be infectious waste when, at the request of family members, they are sent to a crematory. Hospitals that utilize this means of disposal should devise a paper trail system in which a copy of the family release form accompanies the human remains to the designated crematory.

May crematories burn animal carcasses?

Yes, if the carcasses have been designated by the generator as infectious waste, and packaged and labelled as such, and the burning of such materials are in accordance with the PTO or registration T status issued through DAPC.

No, if the animal carcasses are not infectious waste. The solid waste provisions of Chapter 3734. of the Revised Code requires disposal of solid waste at a licensed solid waste disposal facility. Therefore, the crematory would have to obtain a solid waste permit-to-install and annual operating license and in compliance the PTO or registration T status issued through DAPC.

May a crematory burn infectious wastes and/or solid wastes generated on-site?

Yes, if in accordance with the PTO or registration T status.

OHIO EPA DISTRICT OFFICES

Ohio EPA District Office inspectors are your primary information source for questions pertaining to the solid and infectious waste regulations. The telephone numbers of the District Offices are:

Northeast, Twinsburg: (216) 963-1200
 Central, Columbus: (614) 728-3778
 Southeast, Logan: (614) 385-8501
 Northwest, B. Green: (419) 352-8461
 Southwest, Dayton: (513) 285-6357