

USDA APHIS Guidelines for Developing Standard Operating Procedures for APHIS Regulated Garbage

The standard operating procedure (SOP) for handling regulated garbage for your company should be sufficiently detailed to train any company employee to be able to conduct the regulated garbage handling activities outlined in the compliance agreement and to enable any inspector from Animal and Plant Health Inspection Service (APHIS) and/or Customs and Border Protection (CBP) to easily identify your company's approved procedures during monitoring. The SOP must be approved by APHIS or CBP for inclusion in the company compliance agreement.

***Please note, only include information related to regulated garbage handling in the SOP, do not include extraneous information not related to regulated garbage.**

The SOP for your company for handling regulated garbage must include at a minimum:

- 1) Name, address, and phone number of your company/facility (preferably the SOP should be on company letterhead). Pages of the SOP should be numbered, and the most recent revision date should be noted.
 - 2) A complete and detailed description of all steps involved in the handling of regulated garbage at your facility, from the collection, transportation, and storage, to the final disposition of the regulated garbage. These descriptions should accurately reflect what is actually done at your facility and in all areas where your company handles regulated garbage. The description should include how your facility will keep regulated garbage segregated from non-regulated garbage throughout the process.
- Please note: If your company uses contractors, you should indicate where they are working and what duties these contractors are responsible for. Please note, if a company will be performing a service for your company, such as hauling or processing your regulated garbage, but they have their own compliance agreement, they are not considered by APHIS to be sub-contractors. If your company is planning on using a sub-contractor, this means that the sub-contractor will operate under your company's compliance agreement and your company takes responsibility and liability for their actions. (Note: All sub-contractors must be approved prior to inclusion in the primary company's compliance agreement except stevedores or longshoremen.

Specific Items for inclusion in this section include, but are not limited to:

- a. methods of collection regulated garbage
 1. Plastic bags used in the collection or storage of regulated garbage must be a minimum thickness of 3 mil and must be of a unique color to identify them from plastic bags used to collect or store non-regulated garbage. Alternatively the plastic bags can be labeled to identify them as regulated garbage.
 2. Containers used to collect and store regulated garbage must be rigid, tightly covered, leak-proof, and labeled "APHIS regulated garbage" or some other acceptable phrase. Labeling for containers should be legible from at least 10 feet away.
 3. Clarify what areas of the aircraft or vessel from which your company will be collecting regulated garbage, if applicable.

4. Describe the methods of transferring regulated garbage from an aircraft or vessel to your company, or taking custody of regulated garbage from another company, if applicable.
- b. methods of transport of regulated garbage (including a description of the transport vehicle if applicable)
 - a. If a transport vehicle will be used, the vehicle must be fully enclosed, lockable, labeled "regulated garbage" or some other acceptable phrase, and have floors and surfaces which are impervious to liquids and can be adequately cleaned and disinfected.
 - b. If regulated garbage and non-regulated garbage will be transported in the same vehicle, then include a description of how regulated garbage will be identified and segregated from non-regulated garbage during transport.
 - c. methods and length of time of storage of regulated garbage (including a description of the storage location)
 - a. Storage location must allow regulated garbage to be segregated from non-regulated garbage and must be adequately labeled.
 - b. Surfaces of storage location must be capable of being cleaned and disinfected.
 - c. The maximum storage time allowed by APHIS for regulated garbage is 72 hours. Describe how your facility will ensure that regulated garbage is not stored for longer than 72 hours.
 - d. Name, address, and phone number of the primary caterer, hauler, storage facility, and/or processor who will pick up or receive the regulated garbage collected by your company.
 - e. methods of processing of regulated garbage (this is applicable for applicants which are processors of regulated garbage)
 - a. include information on operation of the processing equipment and processing procedures
 - b. include location where current processing procedures are posted
 - f. record-keeping requirements for the handling of regulated garbage (see "Guidelines for Regulated Garbage Record-Keeping")
- 3) A complete description of your facility's back-up plan procedures. The back-up plan is an APHIS requirement for approval, and will be used in the event of an emergency or any other circumstance in which your facility cannot carry out its regulated garbage handling function(s). The back-up plan should also include who may be picking up or receiving the regulated garbage collected by your company if the primary caterer, hauler, storage facility, and/or processor is unable to pick-up or receive your regulated garbage. Any companies/facilities listed in your back-up plan must already be APHIS approved to handle regulated garbage and must be operating under a valid compliance agreement.

Include the following information:

- a. When the back-up plan should be initiated
 - a. If you are unable to meet the aircraft or vessel upon arrival, who will you contact to meet the aircraft and perform the regulated garbage handling (if applicable)
 - b. If you are storing regulated garbage, and it appears that the primary hauler will not be able to pick up the regulated garbage within the 72 hour time limit, indicate who in your company has been designated to contact the back-up hauler and when they will contact the back-up hauler to ensure that the 72 hour time limit is not exceeded.

- c. If you are processing regulated garbage, and your processor becomes inoperable, who will contact the back-up hauler and/or processor and when will you contact the back-up hauler and/or processor to ensure the 72 hour time limit is not exceeded.
 - b. Who is responsible for contacting your customers, if you are unable to perform your regulated garbage function(s).
 - c. What steps to take in an emergency including who at your facility should be contacted in case of an emergency (phone numbers and names or positions).
 - d. Information on contacting CBP and/or APHIS if the back-up plan will be initiated.
 - e. The name, address, and phone number of an APHIS approved entity that can perform each regulated garbage function that your facility performs, as your back-up, in the event that your facility is unable to perform that function as required by the compliance agreement.
 - a. For example:
 1. Airline cleaners must have a back-up entity that can meet and clean the plane in the event that they cannot, and a back-up hauler or caterer that can pick up the regulated garbage from them, in the event that their primary hauler or caterer is unavailable.
 2. Caterers must have a back-up plan for what entity will meet and de-cater the plane in the event that they cannot, and a back-up plan for processing regulated garbage within 72 hours, in the event that their on-site processor or primary processing company is unavailable to. This includes an APHIS approved hauler that can pick up the regulated garbage from the caterer and transport it to the back-up processor.
 3. Regulated garbage haulers must have a back-up entity that can haul the regulated garbage in the event that they cannot, and a back-up processor that they can haul the regulated garbage to in the event that the primary processor is unable to accept or process their regulated garbage.
 4. Fixed Base Operators must have a back-up plan for who will meet the plane and safeguard the regulated garbage in the event that their trained ground crew is unavailable to, and a back-up hauler and/or processor that can haul and/or process the regulated garbage collected by them, in the event that their primary hauler/processor cannot within the 72 hour time limit.
 5. Processors must have a back-up plan for an APHIS approved entity that can process regulated garbage in the event that they cannot within the 72 hour time limit, as well as an APHIS approved back-up hauler that can transport the regulated garbage from their facility to the back-up processor, in the event that they cannot process the regulated garbage.
 - Alternate back-up plans may be considered, but must ensure that the regulated garbage is properly safeguarded at all times and must meet regulatory requirements.
- 4) A complete description of your cleaning and disinfection procedures. This includes but is not limited to:
 - a. Name of the APHIS authorized disinfectant that will be used to disinfect regulated garbage spills and contamination. An APHIS authorized disinfectant must be used to disinfect regulated garbage contamination except inside an aircraft.

- b. Currently the only APHIS approved disinfectants are Virkon-S and Clorox active ingredient sodium hypochlorite 8.25%. **All label instructions must be followed carefully.** Virkon-S and Clorox active ingredient sodium hypochlorite 8.25% may not be used inside of aircraft.
- c. Name of a sanitizer approved by the Environmental Protection Agency (EPA) for use around food contact surfaces for use inside the aircraft (if applicable).
- d. Dilution or mixing instructions for your disinfectant (if it will be diluted or mixed). Include information on labeling your disinfectant with the date and time of dilution or mixing, and include a note on how long the disinfectant is effective after mixing (Virkon-S is effective for seven days after mixing and Clorox active ingredient sodium hypochlorite 8.25% is effective for only 24 hours after mixing,).
 - a. Virkon-S should be mixed to a dilution of 1% using the instructions on the label.
 - b. Clorox active ingredient sodium hypochlorite 8.25% - per label instructions, prepare the disinfectant solution by adding 1 part Clorox active ingredient sodium hypochlorite 8.25% to 9 parts water (8 ounces Clorox active ingredient sodium hypochlorite 8.25% to 72 ounces of water)..
- e. A packing list for your spill kit Spill kits should include at a minimum:
 1. One of the following APHIS-authorized disinfectants: Virkon-S or Chlorox active ingredient sodium hypochlorite 8.25%.
 2. A sanitizer approved by the Environmental Protection Agency (EPA) for use on and around food contact surfaces (as applicable)
 3. A source of clean water adequate to achieve proper cleaning and disinfection
 4. A detergent
 5. A scrub brush
 6. Equipment to pick up solid material (such as a shovel or broom and dustpan)
 7. Materials to contain and or absorb liquids
 8. Plastic leak-proof bags to hold collected materials
 9. Copy of all applicable Material Safety Data Sheets (MSDS) and disinfectant labels, if the original containers are not available
 10. Appropriate personal protective equipment (such as rubber or latex gloves and safety goggles) and/or other equipment as required by the MSDS and the establishment
- f. Location in the facility or vehicle where the spill kit will be kept.
- g. Actual cleaning and disinfection (C&D) steps that will be used at your facility or in your operation for cleaning and disinfecting regulated garbage spills and contamination (both outside and inside the aircraft, if applicable). Include information on cleaning and disinfecting any non-disposable tools or equipment contaminated with regulated garbage, including tools used to clean and disinfect regulated garbage spills, and treating any disposable items used in the cleaning and disinfection of regulated garbage spills and contamination as regulated garbage. The procedures should reflect how C&D is actually performed at your facility. Your procedures should include at a minimum:

1. Non Food Handling Areas:

- Prior to applying detergent or disinfectant, regulated garbage (liquid and solid) must be removed from contaminated surfaces. Apply an absorbent material if needed. All collected regulated garbage and materials used in cleaning and disinfection must be disposed of as regulated garbage.
- Clean/scrub the affected area with detergent.
- Flush the affected area with clean water.
- Apply the disinfectant solution generously; wet the entire affected area. Read disinfectant label to determine how long the disinfectant should remain on the surfaces. (Note: bleach solution must remain on surface for 10 minutes.)
- Flush area with clean water and air dry per disinfectant label.

2. Food Handling Areas:

Use only EPA approved sanitizers in food handling areas.

- Prior to applying sanitizer, all regulated garbage (liquid and solid) must be removed from contaminated surfaces. Apply an absorbent material if needed. All collected regulated garbage and materials used in cleaning and disinfection must be disposed of as regulated garbage.
 - Follow the instructions on sanitizer label.
- h. Information on contacting CBP or USDA APHIS PPQ in the event of a regulated garbage spill outside of the facility or aircraft.
 - i. Record keeping requirements for cleaning and disinfection of regulated garbage spills and contamination and routine use of disinfectants associated with regulated garbage handling.