

United States Department of Agriculture

Guidelines for Writing Operating Procedures (OP) for Handling APHIS Regulated Garbage (RG)

The operating procedure for handling RG for your company should enable any inspector from the 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 operating procedure **must** be approved by APHIS for inclusion in the establishment's compliance agreement. The operating procedures should be sufficiently detailed to train any establishment employee involved in the RG handling activities outlined in the compliance agreement.

NOTICE

Only include information related to handling RG in the operating procedure. Do not include extraneous information not related to RG. See Sample APHIS Regulated Garbage Operating Procedures.

The following information should be included in operating procedures for the establishment to handle RG:

Description of the Steps in Handling RG

The establishment **must** provide a description, as applicable, of the steps in the handling of RG from the collection, transportation, and storage, up to the final disposition of the RG or up to handing off to another authorized compliance agreement holder. If applicable, the establishment must include procedures to keep RG separated from non-regulated garbage throughout the process. Please note the following:

- If your company uses contractors, you should indicate where they are working and the duties for which these contractors are responsible.
- If a company will be performing a service for your company, such as hauling or processing your RG, 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.
- All sub-contractors **must** be approved prior to inclusion in the primary company's compliance agreement except stevedores or longshoremen.

Methods of Collection of RG

Plastic bags **must** be at least 3 mil thick and **must** be of a unique color to identify them from plastic bags used to collect or store non-regulated

- garbage. Seal the bag. Alternatively, the plastic bags can be tagged or labeled to identify them as RG.
- ◆ Containers used to collect and store RG **must** be tight, covered, leak-proof and be uniquely identified outside the container and if words are used, marked with "REGULATED GARBAGE" or a similar acceptable phrase in English and any appropriate foreign language. Any approved area used for storing RG **must** be locked/secured.
- ◆ Clarify the areas of the aircraft or vessel from which your company will be collecting RG, if applicable.
- ◆ Describe the methods of transferring RG from an aircraft or vessel to your company, or taking custody of RG from another company, if applicable.

Methods of Transport of RG

Include a description of the transport vehicle if applicable.

- ◆ 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.
- ◆ If RG and non-regulated garbage will be transported in the same vehicle, then include a description of how RG will be identified and segregated from non-regulated garbage during transport.

Methods and Length of Time of Storage of RG

Describe, as applicable, secure, dedicated storage space on the premises for the RG.

- ◆ Storage location **must** allow RG to be segregated from non-regulated garbage and **must** be adequately labeled.
- ◆ Surfaces of storage area location **must** be capable of being cleaned and disinfected.
- ◆ The maximum storage time allowed by APHIS for RG is 120 hours. Describe how your facility will ensure that RG is **not** stored for longer than 120 hours.

Contact Information

Include name, address, and phone number of the primary caterer, hauler, storage facility, and/or processor who will pick up or receive the RG collected by your company (if applicable).

Methods of Processing of RG

The following applies to establishments that are processors of RG:

- ◆ Include information on operation of the processing equipment and processing procedures.
- Include location where current processing procedures are posted.

Description of Cleaning and Disinfection Procedures

This includes but is **not** limited to the following:

- ♦ Name of the APHIS authorized disinfectant that will be used to disinfect RG spills and contamination. An APHIS authorized disinfectant **must** be used to disinfect RG contamination except inside an aircraft.
- ◆ Location in the facility or vehicle where the spill kit will be kept.
- ◆ For what the establishment operating procedures should include at a minimum for cleaning and disinfection in food handling areas and in non-food handling areas, follow the instructions in APHIS Authorized Disinfectants for Use When Handling APHIS Regulated Garbage.
- ◆ For record keeping requirements for cleaning and disinfection of RG spills and contamination and routine use of disinfectants associated with RG handling, follow the instructions in Guidelines for Regulated Garbage Record-Keeping.
- ◆ Describe cleaning and disinfection (C&D) steps that will be used by your establishment or in your operation for cleaning and disinfecting RG spills and contamination (both outside and inside the conveyance, if applicable). Include information on cleaning and disinfection any non-disposable tools or equipment contaminated with RG, including tools used to clean and disinfect RG spills, and treating any disposable items used in the cleaning and disinfection of RG spills and contamination as RG. The procedures should reflect how C&D is actually performed at your facility.

RG Spills Outside of the Facility or Aircraft

Include information on contacting CBP or PPQ in the event of an RG spill outside of the facility or aircraft.

Backup Systems

Backup systems are **not** for routine use but are initiated in cases of emergency or other non-routine situations. If your establishment has been suspended, canceled, or otherwise is unable to conduct the RG handling activities as outlined in the RG Compliance Agreement (CA) activities, the backup system **must** be implemented. Additionally, if your primary RG handler is unavailable or your primary processor is inoperable, the backup system **must** be implemented, to ensure that RG is **not** stored at the establishment's facility for longer than 120 hours. The backup system **must** be outlined in the operating procedures. The establishment(s) serving as the backup(s) **must** also have a valid compliance agreement covering the same operational activity prior to inclusion on the compliance agreement. The backup(s) **must** be capable of handling the company's RG workload.