Guidelines for Disposal and Decontamination

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Federal Government Actions

• EPA coordinating (FDA, APHIS and FSIS) development of Concept of Operations (CONOPS)
  • lays out roles and responsibilities for decontamination and disposal response actions under Homeland Security Presidential Directive 9 (HSPD-9)
  • addresses disposal and decontamination issues for food products, live animals and crop materials
• FSIS coordinating (FDA and EPA) development of guidelines for field staff on disposal and decontamination options
  • discusses disposal of food products and decontamination of food processing facilities only
  • discusses disposal and decontamination options/techniques
  • discusses data gaps and capability needs
Special Considerations for Intentional Contamination

• Type of agent might differ from an unintentional contamination incident

• Scale of incident might be greater (e.g., might involve coordinated attacks on a number of facilities)

• Crime Scene: coordination with local law enforcement and FBI

• Elevated public concern and interest
Discovery and Response

Potential Intentional Adulteration Event Detected

Where appropriate,
- Notify local law enforcement and/or the FBI
- Notify FSIS, FDA District Manager/Headquarters, and USDA Headquarters
- Notify establishment owner
- Notify State Dept of Health

Establish response team and identify commander

- Conduct investigation
- Detain/retain product
- Recall products, as needed

Clearance for disposal of contaminated food products and decontamination of equipment and facility – obtained from incident commander
Disposal clearance obtained from incident commander

- Contaminated facility owner works with FSIS and other state and local authorities to come up with disposal plan
- Disposal plan should include:
  - different disposal options and which option proposed
  - identification of disposal facility willing to accept waste
  - contingency plan in case disposal capacity saturated (additional disposal sites, methods, etc.)
- Submit plan to response team for review and approval

Plan approved by response team?

Yes

- Facility owner and FSIS inspector works with State solid waste contact and waste facility to coordinate disposal and obtain necessary permits or permit modifications

No

- Facility packages contaminated waste for transfer

Does disposal meet acceptance criteria?

Yes

- Incident commander declares disposal action is complete

No

- FSIS inspectors oversee disposal process to ensure contaminated product cannot get back into food supply
- State and local EPA officials oversee disposal process to ensure contamination does not spread to other media

- Transfer waste to disposal site
- Dispose of waste as planned

- Facility owner procures necessary transportation for transferring contaminated products from site to final disposal facility
Adulterated product removed from area; incident commander clears equipment and facilities for decontamination

- Owner works with FSIS and state and local authorities to develop decontamination plan
- Submit decontamination plan to response team for review/approval

Plan approved by response team?

- Yes
- No

Is full decontamination economically feasible?

- Yes
- No

Owner obtains necessary permits for decontamination process (e.g., permit for EPA Crisis Exemption)

Owner procures decontamination services and decontaminates equipment and facilities as planned

Post decontamination sampling to confirm decontamination successful

Does decontamination meet acceptance criteria?

- No
- Yes

Incident commander declares decontamination action complete

- Yes
- No

Select method(s) of dismantling, decontamination, and disposal

Is/are selected method(s) acceptable?

- Yes
- No

FSIS inspectors oversee process to ensure facility and equipment can be reintegrated into food services

State and local EPA officials oversee decontamination process to ensure contamination is completely removed and secondary wastes are disposed of properly
Available Techniques - Disposal

- Rendering – purified fat and protein components recovered from inedible portions by high-temperature cooking and separation techniques
  - Can result in edible or inedible products
- Non-hazardous waste disposal
  - Land disposal (municipal solid waste landfills)
  - Combustion techniques (municipal or commercial/industrial incinerators)
- Hazardous waste disposal
  - Land disposal (hazardous waste landfills)
  - Combustion techniques (hazardous waste incinerators)
- Special handling
  - Medical waste incinerators
  - Radioactive waste disposal
    - Low level radioactive waste
Available Techniques - Decontamination

Decontamination technique dependent upon:

• Contaminant
  — Bacteria
  — Spores
  — Viruses and Parasites
  — Toxins
  — Chemicals (e.g., pesticides)
  — Radiological Agents

• Surface
  — Hard surface
  — Facilities and structures
Response Needs

- Coordination among agencies and other stakeholders
- Temporary storage of contaminated product pending decisions about disposal options
- Limited capacity of local and regional disposal resources/surge capacity exceeded
- Analytical laboratory capabilities (helped by FERN)
- Ability to detect some agents in various food matrices
- Recall capabilities; product being recalled might be hazardous
- Decontamination techniques not available for all agents
- Indemnification might be needed for decontamination contractors (e.g., anthrax)
Other Issues

• Facility management/owner responsible for disposal and decontamination
• Need to work with EPA (or local/regional equivalent) for disposal permits and any necessary waivers for chemicals
• Decontamination is too expensive
• Facility a crime scene; product might be evidence; need to balance public health protection actions and investigative actions
• Secondary wastes from decontamination need to be disposed of appropriately
• Need to confirm facility is free of residual contaminant before resuming food production