

Emergency Mortality Disposal Advisory February 24, 2020

Summary

Central Valley producers whose normal mortality disposal was disrupted by the recent shut down of the Kerman rendering plant have several options:

- 1. Directly transport the carcasses to an alternative rendering facility. Alternatively carcasses can be transported to a permitted landfill if one can be located which will accept them. An interactive map listing local landfills and their animal disposal permits is available on-line.
- 2. Temporarily store mortalities on their farm in composting piles for later transport to a permitted landfill. <u>This option is only available in counties that have declared emergencies.</u> Most of the counties in the affected area are considering such emergency declarations. CDQAP will provide frequent updates as to which counties intend to take such action.
- 3. Permanently bury mortalities on farm in an emergency landfill- this process requires <u>permit</u> application, fees and paperwork with the Regional Water Quality Control Board.

Producers are required to record the final disposition of each carcass not sent to rendering. This will help protect them from regulatory confusion and potential fines. Records must be maintained for at least one year*

Background

On Friday Baker Commodities announced that collection of livestock mortalities was being temporally suspended in order to install processing machinery at their Kerman facility. The upgrades are being made to increase the plant's capacity. Because decomposition prevents the manual and machine processing used at rendering, the company will not be able to collect the carcasses of animals that die during this period. Baker is hoping to resume normal service on Monday, March 2nd, but installation delays could push that date back.

Drawing on the 2017 heat-related disposal event, CDFA, a wide variety of dairy industry, county and water quality stakeholders worked to develop emergency options for dairy producers. The group agreed to cooperatively implement provisions provided for in the Central Valley Regional Water Quality Control Board's (RB-5) conditional waiver for addressing burial of mortalities during an animal health emergency. As required in the waiver CDFA has notified RB-5, detailing the need for temporary on-site carcass storage or disposal. In addition, several affected counties are in the process of declaring an emergency to allow the conditional waiver to take effect. Fresno, Tulare, Kings, and Kern counties (the primary counties in the area served by Baker) are considering creation of such emergency declarations. Producers with questions about the current status of their own county are advised to contact the office of their county Agricultural Commissioner (Commissioner association website).

* CDFA 79-121 Permit Request to Dispose of Carcass(es) in a Landfill and 79-122 Permit to Transport Carcass(es) to a Landfill are required, to comply with FAC regulations and can be completed after transport if necessary and when CDFA personnel are not available for submission and processing. The records should be kept for at least 1 year after the alternative disposal and available for review by regulatory agencies upon request.

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Disposal Options

Option #1 Direct transport to alternative rendering facility or permitted landfill.

The preferred option for carcasses is direct transport to an alternative rendering facility. This may only be possible for freshly dead animals, since rendering facilities have similar requirements for carcass condition. Sacramento Rendering is accepting fresh dairy mortalities, but the carcasses would have to be transported to the plant in Sacramento County. Producers could potentially coordinate transport with a dead hauler company. To inquire, contact Michael Koewler using the main switchboard at 916-363-4821. Alternatively some producers may be able to locate a landfill that will accept carcasses. A <u>partial listing of permitted landfills</u> with carcass policies and contact information available from RB-5 appears below. A more comprehensive interactive map listing local landfills and their animal disposal permits is <u>available on-line</u> from Cal-Recycle.

Option #2 Temporary storage on-farm for later transport to permitted landfills.

If an alternative rendering facility or landfill cannot be located, carcasses may be temporarily stored on-site in composting piles for later transport to permitted landfills. This mitigates the immediate nuisance problem of decomposing carcasses by the roadside, kills common human and animal pathogens and creates a more manageable material which is more acceptable for landfills. Several guides for composting cattle mortalities are available on-line including USDA and Extension Bulletins from Michigan State and New Mexico State. The date, number and identity of cows composted and subsequently transported to landfill should be documented to answer any future regulatory inquiries.

Research by the University of California suggests dairy manure (either dry-lot scraping or screened manure solids) having a moisture content ranging from 25% to 70% is an effective composting feedstock. A waterproof liner should be used to protect groundwater from infiltration. Adult carcasses should be placed on a 3-foot bed of dairy manure and covered with 3 feet of the same material. The site of the temporary piles should be protected from inundation, washout, runoff, ponding, and scavenging wild animals. The temporary pile should be at least 50 feet from any domestic well. Transport of the composted material to a permitted landfill alleviates environmental concerns related to deep burial.

Producers should contact their landfill before transporting the composted material to ensure the facility is permitted to accept it. Composted material must be removed from the dairy no later than 6 months following the creation of the temporary pile. If composting is done below grade (buried), prior notification to RB-5 is required to avoid enforcement action. Be sure to keep and maintain records to document that the composted material was taken to a landfill within 6 months. RB-5 staff will be looking for evidence of bones and carcasses that have been left for more than 6 months and checking for landfill disposal records during future inspections.

Option #3 Permanent on-site burial in emergency landfills.

A third option available to producers is to permanently bury mortalities on farm in an emergency landfill. The Regional Board considers this a disposal method of last resort. Emergency on-site burial requires a substantial amount of permitting and paperwork documentation. The waiver requirements includes submitting a Notice of Intent within 30 days of the burial, applying for a Waste Discharge Requirement and paying a fee (which may exceed several thousand dollars). In addition, a description of the emergency conditions, a copy of the emergency

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declaration, a map, diagram and photographs and management plan for the site need to be provided. Producers pursuing this option are advised to contact the Regional Board directly.

The above guidance is only applicable during a declared emergency. Once the emergency situation is over, disposal of mortalities on-site will be considered by RB-5 to be a violation of the Dairy General Order, and a violation of California Food and Agricultural Code (FAC) 19348.

This is our best understanding of the current situation. We will provide updates if the situations change and more information becomes available.

CENTRAL VALLEY LANDFILL ANIMAL ACCEPTANCE

Normal operating conditions (i.e. routine, non-emergency)
This is only a partial list of local landfills.

A comprehensive interactive map is available from Cal-Recycle

Landfill	Large animals accepted? (e.g. cattle)	Small animals accepted? (e.g. poultry)	Approximate permitted capacity available for animal mortalities (tons per day)	Landfill Contact Information
Fresno County				
American Ave Disposal Site ¹	No	No	NA	NA
City of Clovis Landfill ²	No	No	NA	NA
Coalinga Disposal Site ³	No	No	NA	NA
Orange Ave Disposal Site	No	No	NA	NA
Kern County			T 0=	
Bakersfield Metropolitan (Bena) SLF ⁴	Yes	Yes	25	Doug Landon (661) 862-8936
Boron Sanitary Landfill ⁵	Yes	Yes	None	Doug Landon (661) 862-8936
Edwards AFB-Main Base Landfill	Yes	Yes		
McKittrick Waste Treatment Site	No	No	NA	NA
Mojave-Rosamond Sanitary Landfill ⁵	Yes	Yes	None	Doug Landon (661) 862-8936
Ridgecrest-Inyokern Sanitary Landfill ⁵	Yes	Yes	None	Doug Landon (661) 862-8936
Shafter-Wasco Sanitary Landfill ⁴	Yes	Yes	25	Doug Landon (661) 862-8936
Taft Sanitary Landfill ⁵	Yes	Yes	None	Doug Landon (661) 862-8936
Tehachapi Sanitary Landfill ⁵	Yes	Yes	None	Doug Landon (661) 862-8936
Kings County				
Avenal Regional Landfill	No	No	NA	NA
CWMI, KHF (MSW Landfill B-19)	Yes	Yes	200	Bob Henry (559) 386-9711
Madera County			1	
Fairmead Solid Waste Disposal Site	No	No	NA	NA

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Mariposa County							
Mariposa County Sanitary Landfill	Yes	Yes					
Merced County			<u>.</u>				
Billy Wright Disposal Site	No	Yes	100	Scott Johnston (209) 385-7388			
Highway 59 Disposal Site	No	Yes	200	Scott Johnston (209) 385-7388			

¹ Accepts occasional small domestic pets only.

⁵ Accepts single large dead animals only.

Landfill	Large animals accepted? (e.g. cattle)	Small animals accepted? (e.g. poultry)	Approximate permitted capacity available for animal mortalities (tons per day)	Landfill Contact Information
Sacramento County				
Sacramento County Landfill (Kiefer) ⁶	Yes	Yes		
San Joaquin County				
Foothill Sanitary Landfill	Yes	Yes	10-12	Jess Padilla (209) 887-3969
Forward Landfill, Inc.	No	Yes	150-175	Ruben Ramirez (209) 982-4298
North County Landfill ⁷	No	Yes	8-10	Marcus Davenport (209) 887- 3868
Stanislaus County				
Fink Road Landfill ⁸	No	Yes	200-225	Michael Franck (209) 837-4804
Tulare County				
Teapot Dome Disposal Site	No	No	NA	NA
Visalia Disposal Site	No	No	NA	NA
Woodville Disposal Site	No	No	NA	NA

Notes:

- A. It is a good idea to provide advanced notice to the landfill operator even if not required.
- B. For trucks typically used to transport animal carcasses, assume a 20 tons/load payload capacity.

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² Accepts waste from the City of Clovis only.

³ Privately owned, unlinedlandfill.

⁴ Accepts single large dead animals. Accepts multiple large dead animals due to special needs. Customer must receive pre- authorization from the landfill.