

11.4.7 DISPOSAL OF ANIMAL CARCASSES

PURPOSE:

It is the policy of Baylor University to dispose of all biological materials in a safe and compliant manner. Animal carcasses are one such material. This policy was developed to ensure that animal carcass disposal is performed in a safe and compliant manner.

SCOPE:

All laboratory or research facilities using vertebrates for teaching, research, or other purposes, regardless of discipline, owned or used by Baylor University students, faculty, and staff.

RESPONSIBILITY:

It is the responsibility of each individual department to ensure that teaching, research and laboratory spaces under their control which generate or have the potential to generate animal carcass waste conform to this policy. Further, it is the direct responsibility of the primary teacher, researcher or operator to ensure that animal carcass waste is disposed of in a manner consistent with this policy. In addition, animal carcass waste shall not be generated without prior approval from the Animal Care and Use (ACUC) committee who shall receive guidance from the Department of Risk Management, who shall evaluate the hazard class of the potential waste stream. The Department of Risk Management is responsible for the implementation, management and compliance monitoring related to this policy.

INTRODUCTION:

Baylor University is subject to various local, state, and federal laws and regulations under the authority of local, state, and federal regulatory entities such as OSHA, TCEQ, EPA, City of Waco, and others. It is the policy of Baylor University to comply with all such regulatory directives and ensure compliance with all laws, orders, and other enforceable regulations.

The disposal of animal carcass waste is a regulated practice. It is the policy of Baylor University to dispose of animal carcass waste in a safe and compliant manner. Animal carcasses generally fall into two categories for the purposes of this policy. All carcasses shall be designated by the primary teacher, instructor, or faculty to be either a non-hazardous carcass or a hazardous carcass. Carcasses shall be considered to be non-hazardous if they have not been treated or manipulated by chemical means or do not meet the criteria of being hazardous. Typically, non-hazardous carcasses include those animals used in dissection research, teaching labs, etc. Animal carcasses shall be considered to be hazardous if any of the following apply:

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1. The carcass is preserved in formaldehyde, formalin or other carcinogenic solution. Note: Formaldehyde washes may be acceptable with the prior approval of the Department of Risk Management.
2. The carcass has been injected with an RCRA listed chemical, toxin, teratogen, mutagen or chemotherapy drug.
3. Any carcass which cannot be confirmed as a non-hazardous carcass will be assumed to be hazardous. Note: Every effort should be made to identify all carcasses due to disposal costs incurred on unknown treated animals.
4. Any animal deemed hazardous by special circumstance or by the Department of Risk Management.

Please note that because of the special disposal needs of hazardous carcass disposal, care should be taken to minimize generation of hazardous carcasses save when absolutely necessary for research and Risk Management needs to be notified of the research and expected volume of carcasses and concentrations used in each carcass; records may need to be kept in this regard. This will help Risk Management minimize turn over times of HCDD receptacles and freezers, and additionally help adequately determine whether material is indeed hazardous.

Animal carcass waste shall be disposed of in accordance with one of the following two methods.

1. Local Waste Disposal:

It is the responsibility of each lab manager, or lead faculty/instructor, of a lab that generates animal carcasses to double bag and place each carcass into a freezer until animal carcass collection day (ACCD). Multiple carcasses are allowed to be placed into double bags if they do not threaten the integrity of the bag. On ACCD, facility services will collect all frozen, double bagged carcasses, in the waste truck for disposal. The following procedure should be followed:

1. Place double bagged carcasses in freezer.
2. Notify the Department of Risk Management at least two weeks prior to achieving freezer capacity based on generation history or known work load.
3. The university Hazardous Materials & Laboratory Safety Specialist shall notify Aramark Services personnel that an ACCD is warranted.
4. University Hazardous Materials & Laboratory Safety Specialist shall disseminate ACCD information to faculty and staff with carcasses.
5. Each lab shall prepare all double bagged, frozen carcasses for ACCD.

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- 6. Facility Services will pick up ACCD material with any assistance that it needs from the University Hazardous Materials & Laboratory Safety Specialist.

Facility services will deliver ACCD material to the Waco landfill. When the driver arrives at the scales, at the Waco landfill, they shall clearly declare to the scale attendant that their load consists of bagged, frozen animal carcasses for disposal. The City of Waco has agreed to accept non-hazardous carcass waste under this procedure. The City will charge Baylor University the standard waste disposal amount per unit of weight plus a \$25 administrative fee. The Administrative fee covers the cost of digging an additional three foot trench for carcass disposal as required by the TCEQ. Under no circumstances shall hazardous classified carcasses be allowed in the City of Waco landfill.

2. Contracted Vendor Disposal:

All hazardous classified animal carcasses shall be disposed of through a contracted waste disposal vendor. Under no circumstances shall hazardous carcass waste be disposed of via the local disposal method. Hazardous carcasses shall be double bagged and frozen until a hazardous carcass disposal day (HCDD) can be arranged.

The university Hazardous Materials & Laboratory Safety Specialist shall contact the appropriate approved vendor to schedule an HCDD. Then he will proceed to notify lab personnel of the date.

Formulated: October 2005

Revised:

Approved by Risk Management Committee: July 20, 2006

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Warren A. Ricks
 Chairman, Risk Management Committee
 Director of Risk Management

_____ Date

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Charles D. Beckenhauer
 General Counsel

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Reagan Ramsower
 Vice President for Finance and Administration

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