Best Management Practices (BMPs) – Class I Landfill Disposal

Animal carcasses disposed of in a landfill can be a potential hazard to wildlife. Animal carcasses of euthanized animals contain a large amount of pentobarbital; if a euthanized carcass is consumed by a scavenging animal, that animal will suffer from and may die from secondary poisoning.

The following guidelines outline the BMPs for the acceptance and disposal of deceased animals at a Class I landfill. No distinction is made between euthanized animal carcasses and non-euthanized carcasses; both should be handled to prevent scavenging by wildlife. Such BMPs are above and beyond the requirements of Florida rule and reduce the likelihood of wildlife coming in contact with a euthanized animal carcass.

1. **Incineration** of euthanized animal carcasses is the preferred method of disposal. If the landfill receives inquiries from the public, first recommend cremation, secondly educate the inquirer that euthanized animals must be taken to a Class I landfill as special waste and declared at the scale house so that they may be disposed of without threatening secondary poisoning of wildlife.
2. **Rendering is not an acceptable method of disposal** for euthanized animals.
3. Deceased animal carcasses should only be accepted at a Class I landfill and not be accepted at transfer stations, recycle centers, etc.
4. Euthanized animals should be buried immediately with constant supervision while exposed. Immediately shall be defined loosely as ‘in the same action.’ (no breaks in the process of receiving, creating a hole, and covering.)
5. By rule euthanized animals must be buried a minimum of 2 feet; recommend 4-6 feet, based on other successful landfills in Florida – the deeper the better.
6. **Bury in an area which can be easily seen** by landfill personnel should wildlife begin foraging over the buried animals.
7. Take precautions to avoid excavating in the area of the buried animals.
8. **Document** the process of receiving and proper burial of euthanized animals.
9. **Educate** all Landfill personnel on the secondary poisoning of wildlife that can result from euthanized animal ingestion.
10. **Signage should be posted** at the scalehouse to educate the public on the secondary poisoning of wildlife that can result from euthanized animal ingestion. Signage should require incoming loads to declare the presence of any euthanized deceased animals in the contents of the materials they are bringing for disposal. The scalehouse operator is to ask all vehicles directly if their load contains deceased animals.
Definitions
For the purposes of this BMP, the definition of a deceased animal includes deceased domestic animals, deceased farm animals, deceased wildlife; and does not include waste from food waste, such as spoiled uncooked chicken from a residential/commercial kitchen. A euthanized animal includes any animal, domestic, farm or wildlife, which is rendered lifeless through the injection of a chemical, such as pentobarbital.

Handling Challenges
The potential exists for a deceased animal to be comingled in a load of garbage unbeknown to the hauler. This may occur as a result of a homeowner dumping a euthanized animal in their regular trash. To further complicate the issue, a euthanized animal disposed of by a homeowner will likely be in a bag or box, making visual identification virtually impossible.

Landfills should take the following steps to minimize the impact of the delivery of euthanized animals without prior knowledge of haulers or landfill employees:

- Educate all landfill personnel to pull a deceased animal out of the waste if one is found.
- If a deceased animal carcass is found, the carcass should be immediately buried in the lined landfill below 4-6 feet of waste/soil material.
- If an operator sees birds targeting a specific area of the landfill (not normal bird activity), the area should immediately be investigated and the object of interest to the birds should be removed from that area and immediately buried below 4-6 feet of waste/soil material in the Class I landfill working face.

What to do if a Distressed Animal is Found:
- Recommend, if at all possible, to not handle the distressed animal but to note the location and immediately notify a local rehab center and ask for assistance. Rehab facilities will be able to assist in the rescue and transport of the animal and have volunteers who can help.
  - Go to myfwc.com site for a list of wildlife rehabilitators. Reach out to any rehab center; all centers will help find a local resource for the distressed animal.
  - The quicker the animal is transported to a rehab center, the better the animals chance of survival.
- Protect the animal from additional harm. For example, if it is in a roadway, block off the area from vehicle traffic.
- Symptoms of an animal that has been poisoned can vary, but most commonly include one or more of the following:
  - Uncoordinated and often unable to stand, walk and/or fly.
  - Shallow breathing and heartbeat.
  - Unable to pick up its head, keeps its eyes closed.
  - In severe cases, the animal will be comatose and may appear dead.
- It is recommended to defer to the local rehab center for the handling of an animal. Should the need arise for landfill personnel to handle the animal, the following is recommended:
  - When approaching a distressed animal, avoid the dangerous parts of the bird/animal, especially the feet on birds.
  - Cover the animal with a towel or jacket and wear work gloves. Pick up the animal around the body. Place in a box.
  - May also place a box over the animal and slide a flat item under the animal.
  - Keep the animal contained in a box with air holes and keep it in a warm, dark place until the animal is transported to a rehab center.

Operation Plan Recommendations
Class I landfills document their operational practices in an Operation Plan, which is required as part of a DEP permit (guidelines covered in Ch. 62-701, F.A.C.). DEP recommends that some, or all, of the above BMPs be incorporated into the Class I Landfill Operation Plan. See the sample Operation Plan section addressing euthanized animal disposal.