

APPENDIX AA

BIO-SECURITY GUIDANCE (Final)

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December 10, 2001

MEMORANDUM

SUBJECT: Routine Biosecurity Procedures for EPA Personnel Visiting Farms, Ranches, Slaughterhouses and other Facilities with Livestock and Poultry

FROM: Michael M. Stahl, Director /s/
Office of Compliance

TO: Acting and Current Regional Administrators and Deputy Regional Administrators

Attached is the final biosecurity guidance for EPA personnel visiting livestock or poultry facilities, including ranches, dairies, feed yards, sale yards, swine premises, slaughterhouses, and other facilities where there are animals or unprocessed animal tissues that may transmit diseases. The guidance was prompted by heightened national concern about the spread of animal diseases. Failing to take appropriate steps to prevent disease transmission could result in severe financial impacts on farmers and the destruction of potentially many of thousands of animals.

While EPA had already incorporated biosecurity discussions into basic CAFO Inspector Training, it was clear that EPA needed to formalize and to reinforce biosecurity measures. Also, while CAFO inspections could be one avenue for possible disease transmission by EPA personnel, guidelines were needed for all EPA field activities that could affect livestock.

The guidance was developed in coordination with USDA's Natural Resources Conservation Service and Animal and Plant Health Inspection Service (APHIS) and the Food and Drug Administration. We circulated drafts for comment to these organizations, EPA headquarters offices, regions, states, and academic and industry contacts. The final guidance relies heavily on and incorporates much of guidance developed by APHIS for USDA employees on June 21, 2001. My thanks to all who contributed to the development of this guidance.

If you have any questions about this guidance, please contact me or Carol Galloway, National Agriculture Compliance Assistance Center, at 913-551-5008.

Attachment:

Routine Biosecurity Procedures for EPA Personnel Visiting Farms, Ranches, Slaughterhouses, and Other Facilities with Livestock and Poultry

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ROUTINE BIOSECURITY PROCEDURES FOR EPA PERSONNEL VISITING FARMS, RANCHES, SLAUGHTERHOUSES AND OTHER FACILITIES WITH LIVESTOCK AND POULTRY

This guidance establishes routine procedures to minimize the risk of EPA personnel transmitting animal diseases from livestock or poultry facilities, including farms, ranches, dairies, feed yards, sale yards, swine premises, slaughterhouses, and other facilities where there are animals or unprocessed animal tissues, secretions or excretions (including saliva, manure or urine, soiled feed, bedding, water or dirt, milk) to livestock or poultry. Often, owners/producers have adopted more stringent biosecurity measures than these procedures. More stringent measures might include specific directions on site entry (e.g., showering, changing clothes to come onto or leave the premises, vehicle washing), or vehicle travel on the site, and other measures. EPA should discuss appropriate biosecurity measures with the operator prior to entering animal areas, and are encouraged to follow the more stringent measures.

Separate emergency procedures will be applicable in cases of actual outbreaks of contagious animal diseases. In such a case, EPA generally will avoid visiting affected areas and will coordinate with USDA's Animal and Plant Health Inspection Service (APHIS) and local emergency control authorities concerning activities in these areas. Periodically, EPA will contact the offices of the appropriate APHIS Area Veterinarians in Charge and the offices of the state veterinarians to identify any areas with existing emergency animal disease events. The addresses and telephone numbers of these offices are attached.

EPA personnel should be aware of personal health and safety issues when visiting livestock facilities and consult with EPA's Health and Safety staff with questions about proper procedures. Livestock facilities may include OSHA-defined "confined spaces," e.g., manure pits. If staff need to enter such areas, all appropriate safety precautions must be followed. In addition, some animal diseases can be spread to humans, such as brucellosis (bacteria) and echinococcus (parasite).¹ Fortunately, the U.S. largely has eliminated major risk of disease transmission from animals to humans by a combination of veterinary medicine and state regulation.

The following procedures are consistent with written procedures developed by APHIS for use by USDA personnel (June 12, 2001).

Biosecurity Procedures

- Individuals should not make on-site visits to livestock operations if they have visited a foreign country and were exposed to or had contact with farm animals (with or without a known contagious disease) within 5 days prior to the site visit. Also, clothing and shoes worn on foreign farm visits should be cleaned before use on U.S. facilities.
- Thoroughly wash hands with soap and water or antibacterial wipes or gel before entering and

¹Brucellosis is transmitted through contaminated and untreated milk and milk products and by direct contact with infected animals (cattle, sheep, goats, pigs, camels, buffaloes, and wild ruminants) or animal carcasses. It is extremely variable in humans. The acute form (less than 8 weeks from illness onset) may result in nonspecific and "flu-like" symptoms including fever, sweats, malaise, anorexia, headache, myalgia, and back pain. Echinococcus granulosus lives on dogs and livestock, and infects humans through contact with these animals. Allergic reactions and damage to various organs from cyst formation are the most common forms of disease in humans.

after leaving any animal facility. Disposable latex gloves also may be used but not as a substitute for proper hand washing.

- Park your vehicle on paved or concrete areas, away from farm production sites, to avoid contact with dirt, mud or manure. If not possible, be certain that tires are free of dirt and debris by hosing the tires and wheel wells before leaving the premises. If this does not clean the tires adequately, take the vehicle to a nearby pressure car wash. Including dates and types of vehicle washing in the vehicle log book is recommended.
- Consider using a vehicle supplied by the facility operator for on site travel if available.
- Prior to entering the site, put on disinfected rubber boots or other footwear that has been cleaned and disinfected, or wear new disposable boot covers. The operator may have its own coveralls and boots for you to wear. However, if visiting only low-risk areas, such as offices that are located away from animal areas, clean street shoes or boots are acceptable (hand washing is still needed). [Note: Boot covers may not provide sufficient traction to safely navigate slopes surrounding lagoons and pits. Personnel may want to use tape to secure the boot cover to prevent slippage].
- On entering a facility, acknowledge any and all other livestock facilities visited within the previous 48 hours including whether or not EPA entered any animal confinement or waste storage areas.
- Inform the operator of where the EPA staff wants to go on the site, determine what biosecurity procedures, if any, the owner/operator has for the on-site locations to be visited, and determine which biosecurity procedures will be followed for the areas to be visited.
- EPA should only enter animal production buildings if it is essential to complete the goals of the visit, and should avoid contact with livestock, poultry or other animals (wild or domestic) on any facility. If close contact with animals is expected, including walking through narrowly confined pens or lots where animals are within reach, wearing coveralls is recommended.
- Designate the interior of your vehicle as a “clean area” and keep clean supplies in this area.
- Designate a “dirty area” of your vehicle, such as the trunk of the car or a specified enclosed area of a truck bed for double bagged clothes or dirty equipment to be taken off site.

- Before leaving the site, clean and disinfect boots or tightly bag boots for later cleaning. Scrub boot bottom and sides to remove all dirt and debris, then wash with disinfectant solution. Disinfectants are not effective on dirt, manure or other organic matter.
- Clean and disinfect equipment if contaminated.
- Use disinfectants that have been registered (or exempted) by EPA for the intended use (see below). Keep a copy of the label and the Material Safety Data Sheet (MSDS) for any registered disinfectant used and make both available to the facility upon its request. Follow all label safety precautions and dispose of empty containers, unused disinfectant solution, and used disinfectant in accordance with label instructions.
- If non-disposable clothing is soiled with manure, blood, milk, or other animal secretions or there has been close contact with livestock (actual handling or walking where animals were within reach), before leaving the site, double bag clothing for later cleaning.
- Dispose of soiled boot covers, and disposable clothing on-site if acceptable to the owner/operator. Where on-site disposal is not possible, double bag and tightly seal all contaminated clothing and gear in disposable bags.
- Inform the owner/operator of the areas of the site that were visited, and the biosecurity procedures taken. This can be done at an inspection closing conference.

Supplies:

- clean boots or new disposable boot covers
- clean change of clothing or coveralls
- appropriate registered or exempted disinfectant (see below)
- water (at least minimum required for hand washing and disinfection)
- a bucket or tray to contain disinfectant
- long handled brush
- clean bags for trash disposal or storage of items to be cleaned
- liquid and/or gel antibacterial soap or wipes
- first aid kit including an eye wash
- phone numbers of the state veterinarian or other local officials available in case you suspect animal diseases are present. Share any such observations with the owner/operator as soon as possible

Disinfectants for Routine Biosecurity

The following products are currently registered by EPA as being effective against a broad range of disease-causing organisms, including Foot and Mouth Disease; they are not effective against all disease-causing organisms. Consult the label information and, if other diseases are a concern, consult the state veterinarian or state department of agriculture.

Virkon S (EPA Reg. No. 62432-1, label and MSDS)
Oxonia Active (EPA Reg. No. 1677-129, label and MSDS)

There are also two household chemicals subject to EPA Section 18 “quarantine exemptions” (i.e., they are exempted from FIFRA pesticide registration requirements) for use as Foot and Mouth Disease disinfectants. They are issued to APHIS but designed so that the general public can make treatments themselves using these chemicals. One permits vinegar (acetic acid) to be applied as a 4% solution, and the other permits bleach (sodium hypochlorite) to be used in a solution of 3 parts bleach to 2 parts water. Information on these Section 18 actions is attached.

Attachments:

1. APHIS Veterinary Series Area Offices and State Veterinarians
2. Copies of EPA-approved labels for Virkon S (April 26, 2001) and Oxonia Active (May 11, 2001) and associated Material Safety Data Sheets
3. Section 18s for Acetic Acid and Sodium Hypochlorite (Bleach)

Disclaimer

The discussion in this document is intended solely as guidance. This document is not a regulation. It does not impose legally binding requirements on EPA, states, or the regulated community. This guidance does not confer legal rights or impose legal obligations upon any member of the public. The general description provided here may not apply to a particular situation based on the circumstances. Interested parties are free to raise questions and objections about the substance of this guidance and the appropriateness of the application of this guidance to a particular situation. EPA retains the discretion to adopt approaches on a case-by-case basis that differ from those described in this guidance where appropriate. This document may be revised periodically without public notice. EPA welcomes public input on this document at any time.