

**CHECKLIST FOR MONITORING COMPLIANCE AGREEMENT
HOLDERS HANDLING REGULATED GARBAGE**
(Revised 12/12)

Name of facility/Company Unit #: _____

Location: _____

Phone: _____

Name/Title of person contacted: _____

Date: _____

Type of facility/entity (Circle all applicable categories):

CATERER CLEANER HAULER/CARTAGE FIRM CRUISE SHIP OPERATOR

FIXED BASE OPERATOR MILITARY BASE PROCESSOR

RAIL YARD STORAGE ESTABLISHMENT

If a quarterly enforcement visit, inspection number this fiscal year: 1st 2nd 3rd 4th

A. ALL FACILITIES/ENTITIES (All non-compliant actions may warrant a violation)	Current Status (Circle one)	Check here if action is required
1. Is the company operating under a <u>current</u> valid Compliance Agreement? Note: If company has changed management (within the same company), contacts, and minor procedures, then update the CA. Other changes may void the CA. Note: If there is no valid compliance agreement in place, issue a violation.	Y N N/A	
2. Were training materials reviewed during the inspection?	Y N N/A	
3. Were training records reviewed during the inspection?	Y N N/A	
4. Has training been conducted annually?	Y N N/A	
5. Have new employees been trained prior to beginning handling regulated garbage? Note: If no, new employees must be prohibited from handling regulated garbage until training is accomplished.	Y N N/A	
6. Is there an APHIS approved written company SOP for handling regulated garbage? Note: If there is no written company SOP in place issue a violation.	Y N N/A	
7. Are APHIS-authorized disinfectants (Virkon® S, Clorox® Bleach or others as allowed) available and used for cleaning spills outside of food handling areas?	Y N N/A	
8. Do all vehicles/personnel servicing the conveyance carry sufficient APHIS-permitted disinfectant and cleaning equipment to clean up spills?	Y N N/A	
9. Have there been any spills outside of the company's facility, building or a vessel since the last visit?	Y N N/A	

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A. ALL FACILITIES/ENTITIES (continued) (All non-compliant actions may warrant a violation)	Current Status (Circle one)	Check here if action is required
10. Is CBP/PPQ notified of spills outside of the company's facility building? Note: CBP/PPQ inspects area of the spill for compliance with spill management requirements.	Y N N/A	
11. Was the spill cleaned up according to the Addendum to the Compliance Agreements? Note: If spills are not being handling according to the compliance agreement, review the compliance agreement with the responsible facility personnel and document for the files. Ensure spills that are witnessed by you during the enforcement visit are cleaned up in an approved manner.	Y N N/A	
12. Were spill cleaning and disinfection and routine regulated garbage cleaning and disinfection procedures documented and kept on file for 3 years?	Y N N/A	
13. Is regulated garbage stored on the premises?	Y N N/A	
14. a. Is it stored in covered leak-proof, vermin-proof containers? b. Are all containers marked as required by the Compliance Agreement? Note: Three (3) mil thick plastic bags are allowed to be used inside vermin-proof areas; rigid containers are required for outside storage.	Y N N/A Y N N/A	
15. Is it kept on the premises longer than the Compliance Agreement allows? Note: If yes, then issue a violation.	Y N N/A	
16. a. Is all regulated garbage removed from the conveyance or pickup location in tight leak-proof covered containers (caterers are allowed to use catering carts) or in 3 mil thick plastic bags? b. If applicable, uncleaned aircraft galley equipment (trays, silverware, plated, etc.) is kept in enclosed containers?	Y N N/A Y N N/A	
17. Are all outside areas around loading docks and garbage containers kept free of debris? Note: It is difficult to distinguish regulated garbage from non-regulated garbage; assume all unidentified garbage is regulated.	Y N N/A	
18. a. Are regulated garbage and associated equipment kept separate from non-regulated garbage or clean equipment? b. If no to A.18.a., is all garbage and associated equipment treated as regulated garbage? Note: If no, there may be a violation.	Y N N/A Y N N/A	
19. Are employees aware of the handling requirements?	Y N N/A	
20. Are the employees disposing of regulated garbage as required by the Compliance Agreement? Note: Describe procedures in Comment Section of the Checklist.	Y N N/A	
21. Are the records of loads (including origin, weight, dated, etc.) handled being accurately kept by the company and available for review as required by the compliance agreement?	Y N N/A	
22. Was the Annual Review of the Compliance Agreement done during this visit? If yes, complete the Checklist for the Annual Review of the CA.	Y N N/A	

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<p>23. Do the records of loads handled and/or stored match the records of the originating company as required by the compliance agreement?</p> <p>Note: For example, if the hauler removes two loads per week from a maritime port, does the processing company have matching records of those loads being dropped off for sterilization or incineration?</p> <p>Note: If no, there may be a violation if the records indicate garbage is not handled according to the compliance agreement.</p>	Y N N/A	
24. Have there been any changes in the emergency backup system identified in the Compliance Agreement?	Y N N/A	
25. Has the emergency backup system used since last enforcement visit?	Y N N/A	
26. If the emergency backup system was used, was CBP/PPQ notified as required by the compliance agreement?	Y N N/A	
<p>27. Is the facility/entity recycling materials per APHIS requirements?</p> <p>Note: Separation of recycling materials is only allowed either onboard the conveyance before off-loading or after being incinerated, i.e. metals or glass removed from ash.</p>	Y N N/A	
<p>Management (Circle the applicable category for each question)</p> <p>28. General attitude and cooperation?</p> <p>29. Knowledge of responsibility?</p>	Poor Good Excellent Poor Good Excellent	
<p>Employees (Circle the applicable category for each question)</p> <p>30. General attitude and cooperation?</p> <p>31. Knowledge of responsibility?</p>	Poor Good Excellent Poor Good Excellent	
B. CARTAGE FIRM/AULERS (All non-compliant actions may warrant a violation)	Current Status (Circle one)	Check here if action is required
1. Are garbage trucks or containers hauling regulated garbage used for non-regulated garbage?	Y N N/A	
<p>2. If yes to B.1. above, are trucks or containers being cleaned and disinfected under CBP supervision prior to hauling non-regulated garbage?</p> <p>Note: If no to B.2., there may be a violation if the unregulated garbage is not being treated as regulated.</p>	Y N N/A	
3. If trans-loading garbage, is garbage spillage controlled in accordance with the Addendum to the Compliance Agreements?	Y N N/A	
4. Are trucks and containers monitored/observed by company employees for leakage while hauling or storing regulated garbage? Explain how in the Comments Section of the Checklist.	Y N N/A	

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B. <u>CARTAGE FIRM/HAULERS (continued)</u> (All non-compliant actions may warrant a violation)	Current Status (Circle one)	Check here if action is required
5. As required by the compliance agreement to specify travel routes, is this requirement being monitored? Explain how routes are monitored in the Comments Section of the Checklist.	Y N N/A	
6. a. Is the cartage firm/hauler supervising the landing regulated garbage off cruise ships? b. Does the cartage firm/hauler Compliance Agreement allow for the supervision of cruise ship crew and/or non-employees to land regulated garbage? If yes to B.6.a. and no to B.6.b., issue a violation	Y N N/A Y N N/A	
7. As required by the compliance agreement to specify travel routes, is this requirement being monitored? Explain how routes are monitored in the Comments Section of the Checklist.	Y N N/A	
8. List pickup companies/locations in the Comments Section of Checklist. Has the list changed since the previous visit?	Y N N/A	
C. <u>CRUISE SHIPS (with Bermuda, Caribbean or Mexico Itineraries)</u> (All non-compliant actions may warrant a violation)	Current Status (Circle one)	Check here if action is required
1. Is the cruise ship using APHIS approved educational material concerning agricultural issues for passengers and crew?	Y N N/A	
2. Has the cruise ship provided arrival notification as required?	Y N N/A	
3. a. Is the cruise ship's crew landing regulated garbage? b. Does the cruise ship's Compliance Agreement allow for the supervision of crew and/or non-employees to land regulated garbage? If yes to C.3.a. and no to C.3.b., issue a violation	Y N N/A Y N N/A	
4. Does the ash landed by cruise ship contain anything other than metal and glass? If yes to C.4., then require the ash to be disposed of as regulated garbage.	Y N N/A	
5. Is the regulated garbage maintained in covered, leak-proof containers inside the rail while onboard the cruise ship?	Y N N/A	
D. <u>PROCESSING (STERILIZATION/INCINERATION/GRINDING)</u> (All non-compliant actions may warrant a violation)	Current Status (Circle one)	Check here if action is required
1. a. If equipment is an autoclave or non-pressurized cooker, has it been calibrated by CBP or PPQ within the last 6 months? [The internal garbage temperature (not the chamber temperature) must be at least 212°F for at least 30 minutes] b. Is a thermocouple or other necessary calibration equipment available for determination of adequate temperature?	Y N N/A Y N N/A	
2. a. If equipment is an incinerator, is all garbage burned (except metal and glass) to ash? b. Does the establishment have an SOP for identifying and reburning regulated garbage to an ash (except metal and glass) if not burned during the initial processing? If no to D.2.a., issue a violation	Y N N/A Y N N/A	

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D. PROCESSING (continued) (STERILIZATION/INCINERATION/GRINDING) (All non-compliant actions may warrant a violation)	Current Status (Circle one)	Check here if action is required
3. a. As required by the compliance agreement, are individual records maintained (including time/temperature in the case of sterilization)? b. Are the recording charts for time and temperature initialed and dated by the operator for each batch and signed by their supervisor? If no to D.3.a. and/or D.3.b., there may be a violation	Y N N/A Y N N/A	
4. Do time/temperature charts indicate any deviation below the required sterilization cycle (time or temperature) established by CBP/PPQ?	Y N N/A	
5. a. Have there been any equipment malfunctions since the last visit? If yes, explain in Comments Section of the Checklist. b. If yes, was CBP/PPQ notified? If not, there may be a violation.	Y N N/A Y N N/A	
6 a. Have there been any major equipment repairs or renovations since the last visit? b. If yes, was a request made for recertification for sterilizing equipment or the incinerator?	Y N N/A Y N N/A	
7. Is there processing equipment in use that has not been certified or calibrated by CBP/PPQ?	Y N N/A	
8. Is sterilized/cooked garbage going to a landfill? If no, list where in the Comments Section of the Checklist and consult the local AQI VMO for follow-up.	Y N N/A	
9. a. Is grinding is the primary disposal method? b. Are there other methods in place to dispose of materials that cannot be ground? Explain how the materials not ground are disposed of in Comment Section of the Checklist.	Y N N/A Y N N/A	
10. If grinding is the primary disposal method, does the grinder directly attached to an APHIS approved sewage system? Note: The sewage system cannot be a septic tank. If no to D.10., there may be a violation	Y N N/A	
11. Are the sterilizer, grinder or incinerator and surrounding area kept clean and free of spillage?	Y N N/A	
E. RAIL YARDS (All non-compliant actions may warrant a violation)	Current Status (Circle one)	Check here if action is required
1. Is the rail company cleaning or cleaning and disinfecting contaminated freight cars per the compliance agreement?	Y N N/A	
2. Is the rail company returning regulated garbage and contaminated rail cars back to Mexico within 72 hours as indicated by the compliance agreement?	Y N N/A	
3. Is the rail company providing all notifications to CBP (set backs, rail cars carrying wheat, etc.) as required per the compliance agreement?	Y N N/A	

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ALL FACILITIES/ENTITIES

Comments from the checklist requiring further description, to include items that require action:

Other deficiencies/violations noted:

Deficiencies resolved at the time of inspection:

Time allowed to correct deficiencies not immediately resolved: _____

Facility Employee Signature and Title

Date

CBP/PPQ Official Signature and Title

Date

A copy should be provided to the facility employee.