All-Hazards Events

Large quantities of animal carcasses that result from an all-hazards event (blizzard, flood, tornado, etc.), any disease-related mass deaths of livestock, or an event in which the state veterinarian determines that depopulation of animals is required, must be managed in a manner that prevents the spread of infection and contamination of soil and ground water. During such events, the Colorado Department of Agriculture is the lead agency and will direct all activities related to management and disposal of carcass wastes. The Memorandum of Understanding (MOU) between the Department of Agriculture and the Colorado Department of Public Health and Environment (we, us, our) called “Regarding Storage, Treatment or Disposal of Livestock Carcasses During Any All-Hazards Event” is available on our website at colorado.gov/cdphe/swguidance. This agreement provides guidance related to the roles and responsibilities associated with a mass mortality or depopulation event. Emergency preparedness and response plans for control and mitigation of livestock disease outbreaks can be found in the Animal Health Division of the Department of Agriculture’s website (colorado.gov/aganimals) under the Animals tab.

Other Events

Carcasses that are disposed of due to mortality or disease unrelated to an all hazards event or that cannot be used for their original intended purpose are considered to be a solid waste and must be managed in compliance with the Colorado Solid Waste Act (30-20-100.5 et.seq., C.R.S.) and its implementing regulations (6 CCR 1007-2, Part 1). Be aware that under these regulations, special requirements apply to animals known or suspected of being contaminated with infectious substances contagious to humans.

The local or county governments may also have regulations and ordinances regarding the proper management of carcasses. Therefore, you should contact your local public health department concerning local ordinances for disposal. Inappropriate management of these wastes may spread infection or cause contamination of soil or ground water.

In general, the following best management practices may be used for the safe disposal of carcasses that are not contaminated with infectious substances contagious to humans.

Disposal at a Permitted Landfill

Carcasses may be sent to a permitted solid waste landfill for disposal with the landfill operator’s prior approval. You will need to contact the landfill operator first to determine their waste acceptance policies. Many landfills have specific days or times when they will accept carcasses for disposal or may have certain packaging requirements that must be met before they will accept the waste.
Rendering
Carcasses may be sent to a licensed rendering plant with the rendering plant operator’s prior approval. You should contact the plant to make arrangements before sending the carcasses. Again, these facilities may have specific preparation and packaging requirements for the carcasses that must be met before they will accept carcasses for disposal.

Off-site Incineration
Carcasses may be sent to an off-site incinerator (for example, a pet crematory) that is permitted and approved by local authorities and/or our Air Pollution Control Division to accept such wastes. You should contact the facility to see if they have any preparation or quantity limitations prior to transporting the carcasses.

Composting
Carcasses may be sent to an off-site composting facility that is permitted to accept such wastes. You will need to contact the composting facility directly and determine their waste acceptance policies prior to shipping the carcasses.

Composting of carcasses may be allowed on your own property. Depending on the specifics of your operation, it may be regulated 1) by the Colorado Department of Agriculture and exempt from Solid Waste regulations; or 2) regulated under dual authority of our Solid Waste Program and the local governing authority in accordance with Section 14 of 6 CCR 1007-2. Under Option 2 above, you will need to have an approved composting plan in place before you may conduct such operations. Composting plan requirements are described in Colorado’s solid waste regulations (6 CCR 1007-2, Part 1, Section 14.11). These plans must include, but are not limited to:

- The basis for selecting the composting site, including site conditions that make it appropriate for a composting operation.
- Structures to be used for run-on and runoff controls.
- Odor management.
- A description of the composting operation, including how the compost will be managed and tested, and what will be done with the final product

Pit Incineration
In certain cases, carcasses may be incinerated in an onsite pit. Open burning permits, obtained through our Air Pollution Control Division, are required for this process. Pit incineration is generally used when there are several animal mortalities that resulted from disease and there is a risk for disease transmission if the carcasses are transported for disposal offsite. Additional controls, such as plans for disposition of the ash and other remains, must be specified prior to using this process.

On-Site Burial
Carcasses may be buried on-site once concurrence has been obtained from this department and the appropriate local agencies. If you bury your carcasses on your own property, you should follow these best management practices:
• Layers of lime or quicklime should be applied below and above the carcass to help accelerate decomposition of the waste. Care should be used in applying lime as it is caustic and can cause severe burns to the skin and eyes.
• Burial pits must be covered with a minimum of two feet of soil.
• Carcasses cannot be placed in any body of water, seasonal creek or pond, or in areas that may carry or hold water such as gullies, ditches, blowouts or natural depressions.
• To minimize potential impacts to groundwater, large numbers of bigger carcasses (e.g., more than ten cows) should not be limed and buried together.
• Surface water must be diverted from the burial site through the use of berms or other structures.
• All carcasses must be buried at least 150 feet away from any water supply source.
• All carcasses must be buried downgradient from any groundwater supply sources.
• The bottom of the burial pit must be at least five feet above the high point of the uppermost groundwater table to ensure that carcasses do not come into contact with groundwater.
• Burial sites must be located at least one mile away from any residence of any person.
• Burial sites should not be located in areas with fractured or cavernous rock, high seasonal water tables or highly permeable soils.

Other disposal practices, including alkaline hydrolysis and mobile incineration, may be used with prior approval.

If you have a large number of animal mortalities due to disease, including Avian Flu, contact the Colorado Department of Agriculture or State Veterinarian’s Office for further guidance on controlling livestock and poultry disease. The Department of Agriculture will determine if the mortalities should be managed as an all-hazards event.

For more information, contact:
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Hazardous Materials and Waste Management Division
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