Soil Permits: It is not a dirty word!



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Got Dirt?

- Routine lab safety inspection, you visit Dr. Dirt's lab
- Professor of Civil, Construction & Environmental Engineering
 - **Research is on soil compaction**

Several bins of soil in the lab labeled "Dominican Republic Soil Samples"



Would you be concerned about this soil?

What follow up questions would you ask?



Got dirt?

Dr. Dirt mentions that he also has soil samples from:

Canada, Florida, Hawaii, and Illinois

He is using all of these soil samples in a soil study in his lab.



Are there any concerns about soil from within the U.S.?

What about Canadian soil?





Dr. Dirt tells you he is glad you came.

He is actually wrapping up this project and will need to dispose of all this soil soon.

How would you tell him to dispose of this soil?

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Topics

- Who regulates soil?
- Why is soil regulated?
- What is soil?



- What are the requirements for regulated soil?
- Treatment options for regulated soil?
- Case study

Types of Soil Research in Colleges at ISU:



- Engineering
 - Compaction
 - Erosion
- Agriculture & Life Sciences
 - Diseases
 - Nutrition
 - Taxonomy
- Veterinary Medicine
 - Parasites

Soil Permit Regulations

- U.S. Department of Agriculture
 - Animal and Plant Health Inspection Service (APHIS)
 - Plant Protection and Quarantine (PPQ)
 - 7 CFR 330

Soil can provide a pathway for the introduction of a variety of dangerous organisms into the United States.



USDA-APHIS-PPQ



Soil Permits & Compliance Agreement

> Plant and Plant Product Permits





Plant Pest Permits

USDA-APHIS-PPQ



Soil Permits & Compliance Agreement

> Plant and Plant Product Permits





Plant Pest Permits

Got Soil?

- Mixture of inorganic and organic materials
 - Organic materials are unidentifiable plant and/or animal parts.



Topsoil, forest litter, wood or plant compost, humus, earthworm castings

Not Soil

- Sand
- Clay
- Talc & Chalk
- Rocks
- Volcanic pumice
- Salt
- Iron ore
- Gravel



Is Anything Exempt?



- Peat, cosmetic mud and other mud products
 - Processed to a uniform consistency
 - Free of plant parts or seeds
- Volcanic rock, pumice, geologic samples, drilling cores, or mud
 - Mined so it is free of organic material
- Any sediment, mud or rock from oceans of the earth

In Our Biosafety Context....



Purple loosestrife

- Soil can harbor:
 - -Animal and plant pests
 - Bacteria
 - Virus
 - Fungi
 - Nematodes
 - Arthropods
 - Noxious weed seeds and propagules

Pest Alert

- Fire Ant
- Golden Nematode
- Karnal Bunt
- Witchweed
- Mexican Fruit Fly









Where can we find soil?

- Earth moving equipment
- Personal gear (shoes)
- Tents and pegs
- Digging tools



- Backpacks
- Vehicles
- Storage containers
- Crates and pallets
- Souvenirs (rocks, soil, manufactured wooden articles)

What's regulated?

- Untreated foreign soil
- Hawaii and US territories

– Puerto Rico, Guam







 Untreated domestic soil from designated quarantine areas
Compliance Agreement

What's not regulated?

- Soil from non-quarantined parts of continental U.S.
 - Quarantine areas constantly being updated by USDA APHIS
- Most (but not all!) parts of Canada
- Soil that has been properly treated
- Check with USDA APHIS





How can soil be treated?

• Three categories of treatments are authorized for soil:

1- Dry heat at 250F for at least two hours

2- Steam heat at the same temperature for 30 minutes at 15 lbs/p.s.i. pressure

- 3- Other treatments and conditions such as:
- destructive analysis
- acid washing
- incineration



You want to import soil?

- 1. PPQ treats soil at port of entry
 - ≤ 3 lbs shipment of soil only
- 2. Become an authorized soil lab
 - Requires PPQ 525A Permit and Soil Compliance Agreement
- 3. Treat soil at another authorized soil laboratory
 - Soil lab that has a valid soil permit/compliance agreement

What is a Soil Laboratory?



Want to find an approved soil lab in your state?



http://www.aphis.usda.gov/plant_health/apps/ifars.php?ndx=3&fltr=IA&sn=Iowa IOWA STATE UNIVERSITY Department of Environmental Health and Safety



Our Focus Blog Home Newsroom Resources

APHIS Inspected Facilities Authorized to Receive Soil

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What if I plan to extract biological organisms from the soil?

• <u>Prohibited under a PPQ 525-A permit.</u>

• Requires a PPQ 526 Permit + PPQ 525-A permit



How does EH&S get involved?

- Permit Specialist
 - Biotechnology Regulatory Services
 - Veterinary Services
 - Plant Protection Quarantine
- Guide thru e-permits process

- Assistance during USDA inspection
- Reminder of permit is about to expire
- Incinerator



Incinerator



- Alternate method of disposal
 - Cannot autoclave
 - Cannot use chemicals to decontaminate
- Burns 1080 lbs. per hour
- Temperatures range from 1300-2000 degrees F
- EH&S has a USDA permit + Soil Compliance Agreement

USDA Permit + Compliance Agreement

- Annual Training
 - Review of procedures and SOPs
 - Permit conditions
 - Reporting Spills and Releases
- Movement within campus is in ISU owned vehicle
- Provide a copy of Client's permit

EH&S requirement for burning

- Double bagged and within a sturdy, leak-proof container
- Outside container must sustain 13 feet drop into hopper without rupturing





CASE STUDY



Case Study: Iowa-Brazil

Mr. Soil is the lab manager of the Soil Analysis lab at your University.

Mr. Soil <u>has</u> a USDA Soil Permit + Soil Compliance Agreement to receive soils from <u>different parts of the world</u>.

He gets contacted by a company (Save the World, INC.) to perform soil analysis for a project in Brazil.

Can Mr. Soils provide this service using the permit he already has?



Mr. Soil designates Dr. Beet to travel to Brazil and oversee the collection and shipment of the soil sample.

Dr. Beet gives oral instructions on how to package and ship the samples.



Do you think oral instructions were adequate here? The first shipment goes well. Mr. Soil finds a new job and <u>leaves</u> <u>the University</u>. However, Dr. Beet carries on with the project and prepares to receive the second samples shipment and he does not travel to Brazil because the local technicians will collect and ship the soil. Dr. Beet sends Mr. Soil's permit to accompany shipment.

Can Dr. Beet continue to use Mr. Soil's permit?



The shipment container arrives at U.S. Customs and Border Patrol. The package is damaged and <u>leaking</u>.

Customs and Border inspector contacts the USDA.

USDA contacts Mr. Soil and he said he had left that employer.

What do you think happened to the shipment of soil?

What do you think happened to Mr. Soil?



Lessons Learned: Permit conditions not followed

- Mr. Soil did not notify USDA of leaving position and location (cancel permit)
- Written SOPs not shared with technician in Brazil
- Laboratory personnel (Technician, Faculty) not trained on permit conditions
 - Shipment occurs without valid permit
 - Double leak proof, sturdy container not used for shipment



Oh what to do, what to dooo?

Acknowledgements

• Biosafety Staff







Thanks! www.ehs.iastate.edu

