



Division of Environmental Health

State of North Carolina
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North Carolina Department of Environment and Natural Resources
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On-Site Wastewater Section
Andy Adams, Section Chief

Memorandum

To: NC Environmental Health Specialists
NC Plumbing Code Enforcement Officials

From: Andy Adams, Chief, On-Site Wastewater Section, NC Division of Environmental Health
Mike Page, Chief Certification Engineer, Engineering Division, NC Dept. of Insurance

Subject: Incinerating Toilets

Date: October 19, 2005

This memo is intended to clarify misunderstandings between local environmental health specialists and plumbing code inspectors concerning when an incinerating toilet may be installed under their respective Laws and Rules. Environmental Health Specialists in Local Health Departments enforce on-site wastewater requirements, and local plumbing code inspectors enforce the State Plumbing Code. This Memorandum is intended to identify the circumstances and conditions for use of incinerating toilets.

1. In general, incinerating toilets have their most appropriate application where the building is remote, there are a small number of users who can be trained in their operation, and the facility is not required to have toilets available for use by the public. Prior to the approval of incinerating toilets, the local health and plumbing code enforcement officials shall concur with their use in any particular instance.
2. Incinerating toilets may be approved as a non-ground absorption sewage system by the local health department only where connection to an approved septic tank system or to a public or community sewage system is impossible or impractical, and only when any other wastewater to be generated by the facility (including any non-toilet sewage) shall be handled by another approved system (see 15A NCAC 18A .1958). Incinerating toilets shall not be permitted to serve residential applications.
3. When used in a facility that cannot have any connection to a water supply source, handwashing facilities shall be provided by waterless bacteriological hand cleaner and disposable hand towels or pre-moistened hand towels, and drinking water shall be provided by bottled water. No water supply connection may be used for hand cleaning purposes or for drinking unless there is an approved sewage treatment and disposal system.
4. The incinerating toilet shall be approved by an approved standards institute such as the National Sanitation Foundation and Underwriters Laboratory, or equivalent third party certification/listing organization(s). The incinerating toilet must be installed in a room complying with the toilet room requirements of Section 310 of the State Plumbing Code, including the Accessibility Code, and must be installed in accordance with manufacturer's instructions. Copies of installation, operating, and maintenance instructions shall be left with the incinerating toilet.

ON-SITE WASTEWATER SECTION

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5. Permits and Inspections: The Authorization to Construct for the incinerating toilet shall be issued by the Environmental Health Specialist in accordance with "Laws and Rules for Sewage Treatment and Disposal". The building permit will be issued by the local building inspection department after receipt of the Authorization to Construct from the local health department, following a similar procedure to issuance of a building permit after receipt of an Authorization to Construct for a septic tank system.

Incinerating toilets are not addressed in the Plumbing Code. However, Section 205 of the NC Administration and Enforcement Requirements Code allows building inspection departments to approve alternate material, design, and methods which are equivalent to those prescribed in the technical codes in quality, strength, effectiveness, fire resistance, durability, and safety.

The environmental health specialist shall verify that the toilet has been installed and is operational. Inspection of the toilet room, ventilation system, and electrical system will be performed by the building, mechanical and electrical inspectors. After the installation and operation of the incinerating toilet has been approved, the environmental health specialist shall issue an Operation Permit. When the building inspection department receives a copy of the Operation Permit and all other building code requirements are met, a certificate of compliance may be issued for the building.

Your assistance and cooperation in dealing with these situations is greatly appreciated. If there is a need for any additional information or clarification, please do not hesitate to contact us.