

STATE OF MICHIGAN



JOHN ENGLER, Governor

**DEPARTMENT OF ENVIRONMENTAL QUALITY**

HOLLISTER BUILDING, PO BOX 30473, LANSING MI 48909-7973

INTERNET: <http://www.deq.state.mi.us>

RUSSELL J. HARDING, Director

REPLY TO:

WASTE MANAGEMENT DIVISION  
PO BOX 30241  
LANSING MI 48909-7741

May 8, 1997

Mr. Bruce D. Brown  
American Innotek, Inc.  
1565 Creek Street, Suite 108  
San Marcos, California 92069

Dear Mr. Brown:

Staff from the Waste Management Division of the Michigan Department of Environmental Quality (MDEQ) have completed their review of the information submitted to us in a letter dated April 9, 1997, for the products Brief Relief™ (urinal bag) and Disposa-John™ (solid waste bag). You question whether the products can be disposed in any landfill within Michigan, after being used. You should realize that Michigan licenses industrial waste landfills (Type III wastes) in addition to municipal landfills (Type II wastes) and hazardous waste landfills (Type I wastes). The products listed above would not meet the definition of an industrial waste, therefore they could not be disposed in a Type III Landfill.

Pursuant to Section 11506(1)(a) of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (NREPA), solid waste does not include human body waste. Therefore, there is no prohibition from disposing of human body waste into a licensed Type II Landfill, if it is not a regulated hazardous waste {Rule 430(2)(a)} or does not contain free liquids {Rule 430(2)(c)}. The analytical information supplied seems to indicate that the used products would not be a regulated hazardous waste and there appears to be no free liquids associated with the used products. Therefore, they could be disposed into a licensed Type II Landfill. Please be aware that any potential facility may have specific prohibitions from disposing of such wastes.

Additionally, this letter should not be construed as an endorsement of the use of the product, nor an absolution to the supplier's obligations or liability should problems arise from its use/and or disposal. If you have any questions concerning this matter, please contact me.

Sincerely,

A handwritten signature in black ink that reads "Duane Roskoskey".

Duane Roskoskey  
Environmental Quality Specialist  
Solid Waste Program Section  
Waste Management Division  
517-335-4712

cc: Ms. Joan Peck, MDEO