



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
LANSING



C. HEIDI GREYER  
DIRECTOR

TO: Rural Medical Waste Producers

FROM: Jeremy W. Hoeh, Supervisor  
Environmental Health Programs Unit  
Drinking Water and Municipal Assistance Division

Andrew L. Shannon, Environmental Quality Specialist  
Medical Waste Regulatory Program  
Waste Management and Radiological Protection Division

DATE: October 29, 2018

SUBJECT: Facility Wastewater Disposal Requirements and On-site Wastewater Systems

The Department of Environmental Quality (DEQ) has received multiple inquiries from regulated facilities and professional associations concerning commercially-generated (operational) wastewaters that are commingled with domestic (sanitary) wastewater at rural sites using on-site wastewater systems (commonly called septic systems) for discharge. On-site wastewater systems typically include septic tanks and soil dispersal systems. The specific inquiries the DEQ received have focused on facilities that generate medical and related discharges from the commercial (operational) activities, as well as regulatory concerns associated with these activities and the potential for environmental pollution. The commingling of domestic (sanitary) wastewater and any commercially-generated (operational) wastewater intended for discharge/treatment by a shared on-site wastewater system is prohibited.

Domestic (sanitary) wastewater discharge lines or piping and commercial (operational) wastewater discharge lines or piping require physical separation within the establishment, and the plumbing must remain isolated during discharge from the facility. Any domestic (sanitary) wastewater generated (restrooms, employee breakrooms, etc.) may continue to be treated by an approved on-site wastewater system designed in accordance with the Michigan Criteria for Subsurface Sewage Disposal or the local health department regulations, if appropriate. However, any commercially-generated (operational) wastewater will require diversion to a sealed holding tank or other mechanism approved for use by the DEQ. In instances where holding tanks are used, the diverted wastewater in the holding tank must be managed to meet the medical waste regulations. See the enclosed *Medical Waste Pocket Reference* and the *Dental Offices with On-site Septic System Guide* and the *Funeral Homes with On-site Septic System Guide* for more information; visit our Medical Waste Web page at [www.michigan.gov/deqmedwaste](http://www.michigan.gov/deqmedwaste) to find vendors who can assist with proper recycling or disposal of your commercially-generated (operational) wastewaters.

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Commingling commercially-generated (operational) wastewater with domestic (sanitary) wastewater may pollute surface and drinking water via groundwater contamination from sources such as medical waste, mercury, formaldehyde, and pharmaceuticals. The functionality of a septic tank and soil dispersal system can also be compromised due to the addition of hazardous constituents that may both pollute the groundwater and destroy the biological components of the system that process the waste.

Your local health department or professional membership organization may have resources to help you locate alternative recycling or disposal options. For onsite issues/questions, please contact Mr. Jeremy Hoeh at 517-284-6528; [hoehj@michigan.gov](mailto:hoehj@michigan.gov); or DEQ, Drinking Water and Municipal Assistance Division, P.O. Box 30817, Lansing, Michigan 48909-8311. For medical waste issues/questions please contact Mr. Andrew Shannon at 517-230-9800; [shannona1@michigan.gov](mailto:shannona1@michigan.gov); or DEQ, State Office Building, 5th Floor, 350 Ottawa Avenue, NW, Unit 10, Grand Rapids, Michigan 49503.

#### Enclosures

cc: Ms. Cana Garrison, Government Relations Director, Michigan Funeral Home Directors Association  
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