



State of Ohio Environmental Protection Agency

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May 7, 2007

Mr. Dave Squalli
Ecodas
32 Birch Crescent, Suite 3
Rochester, NY 14607

**RE: Evaluation of the Ecodas Systems T300, T1000, and T2000
Infectious Waste Treatment Units Technology**

Dear Mr. Squalli:

This letter is in response to documentation submitted by Ecodas for the Ecodas Systems T300, T1000, and T2000 infectious waste treatment units. The documentation submitted requests the use of the Ecodas Systems T300, T1000, and T2000 as an alternative technology for the treatment of infectious wastes, including pathological wastes. On May 12, 2006, Ohio Environmental Protection Agency (Ohio EPA) received an Evaluation of Infectious Waste Treatment Technology Information Request Form requesting statewide approval of the Ecodas Systems T300, T1000, and T2000. On February 12, 2007, Ohio EPA received documentation requesting the approval of the Ecodas Systems T300, T1000, and T2000 to be used to treat pathological waste. The purpose of this letter is to notify Ecodas of the determinations made by Ohio EPA in response to the documentation submitted.

According to the information submitted, Ecodas Systems T300, T1000, and T2000 use pressurized heated steam and high temperatures during treatment. In addition, the Ecodas Systems T300, T1000, and T2000 have heavy duty shredders that cut the wastes placed inside the units rendering them non-recognizable. Ohio EPA understands that these shredders can be disengaged, if necessary, during the treatment cycle. Please be aware that in Ohio, there is no requirement to render infectious wastes non-recognizable during or after treatment.

Ohio EPA has determined that the Ecodas Systems T300, T1000, and T2000 operate on the principle of an enhanced autoclave and will be subject to the operational requirements for autoclaves, as specified in paragraph (D)(4) of Rule 3745-27-32 of the Ohio Administrative Code (OAC). Therefore, the Ecodas Systems T300, T1000, and T2000 do not require approval as alternative infectious waste treatment technologies.

Pursuant to OAC Rule 3745-27-32 (D)(1)(f), autoclaves may receive approval from Ohio EPA to be used to treat pathological wastes. On February 12, 2007, Ohio EPA received documentation from Ecodas requesting approval of the Ecodas Systems T300, T1000, and

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

T300, T1000, and T2000 to treat pathological waste. After review of the protocol and efficacy data submitted to demonstrate achievement of the performance standard, Ohio EPA has determined that Ecodas has satisfied the criteria specified in OAC Rule 3745-27-32 (D)(1)(f). This letter serves as notice that the Ecodas Systems T300, T1000, and T2000 are hereby approved to treat pathological wastes, following installation of the unit and validation testing.

Please be aware that two validation test sequences are required prior to treatment of pathological wastes with the Ecodas Systems T300, T1000, and T2000. The first validation shall occur after the infectious waste treatment unit is installed to ensure the equipment performs to specifications. The second validation is required for the treatment of pathological wastes. In addition, anyone interested in opening an off-site infectious waste treatment facility or wanting to treat infectious wastes not generated on the premises operated by the generator must obtain a Permit-to-Install and a license as specified in Ohio Revised Code Sections 3734.02, 3734.05, and 3734.06. On-site treatment facilities that treat only infectious waste generated on the premises owned or operated by the generator are not required to obtain a permit-to-install or a license. However, registered generators that treat their own infectious waste are required to list the treatment method on their registration certificate.

For questions regarding this letter, or for further assistance, please contact me by telephone at (614) 728-5338, by email at maera.flynn@epa.state.oh.us, or in writing at the above address.

Sincerely,

A handwritten signature in black ink that reads "Maera Flynn". The signature is written in a cursive, flowing style.

Maera Flynn
Infectious Waste Specialist
Division of Solid and Infectious Waste Management
Ohio Environmental Protection Agency

Enclosure: OAC Rule 3745-27-32