



Janet Napolitano  
Governor

# ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY

1110 West Washington Street • Phoenix, Arizona 85007  
(602) 771-2300 • www.azdeq.gov



Stephen A. Owens  
Director

**CERTIFIED MAIL**  
**Return Receipt Requested**

February 15, 2006  
PRU06 - 040

Mr. David H. Squalli  
ECODAS U.S. Division Vice President  
32 Birch Crescent, Suite 3  
Rochester, NY 14607

**Re: Biohazardous Medical Waste Treatment Technology  
ECODAS T 2000, T1000, and T 300 Department Registrations**

Dear Mr. Squalli:

The Arizona Department of Environmental Quality (ADEQ), Solid Waste Plan Review Unit (PRU), received and reviewed the November 28, 2005, Application for Arizona Biohazardous Medical Waste Alternative Treatment Technology Registration for ECODAS Medical Waste Treatment System T300, T1000, and T2000, other supporting documents and subsequent correspondence requesting ADEQ approval and registration for an alternative biohazardous medical waster treatment technology.

Pursuant Arizona Administrative Code (AAC) Title 18, Chapter 13, Article 14 - Biohazardous Medical Waste and Discarded Drugs Rules, incineration, and autoclaving of biohazardous medical waste are considered as conventional treatment technologies which is not require prior approval from ADEQ. ADEQ determined that ECODAS Medical Waste Treatment System T300, T1000, and T2000 are "autoclave", conventional treatment technology. Therefore, ECODAS Medical Waste Treatment System T300, T1000, or T2000 shall not require prior registration or approval from the Department.

However, any person who intends to use ECODAS Medical Waste Treatment System T300, T1000, or T2000 in the State of Arizona shall obtain a solid waste facility plan approval from ADEQ, pursuant to AAC R18-13-1410. Furthermore, ECODAS Medical Waste Treatment System T300, T1000, and T2000 autoclave systems must be able to demonstrate and be capable of achieving the treatment standards prescribed in AAC R18-13-1415 to be used in Arizona.

Northern Regional Office  
1515 East Cedar Avenue • Suite F • Flagstaff, AZ 86004  
(928) 779-0313

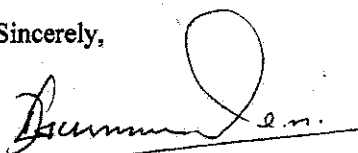
Southern Regional Office  
400 West Congress Street • Suite 433 • Tucson, AZ 85701  
(520) 628-6733

Additionally, pursuant to AAC R18-13-1412. A.1.a. through e, owners or operators of the proposed biohazardous medical waste treatment facility shall submit the following documentation to the department to obtain the facility plan approval from the department. Therefore, owners or operators of the proposed biohazardous medical waste treatment facility that is planning to use ECODAS Medical Waste Treatment System T300, T1000, or T2000 will contact ECODAS U.S. Division to obtain the necessary documentation as listed below.

- a. Equipment specifications that identify the proper type of medical waste to be treated in the equipment and any design or equipment restrictions.
- b. Manufacture's specifications and operating procedures for the equipment that described the type and volume of waste to be treated, monitoring data of the treatment process, and calibration and testing of the equipment, providing specific details about the capabilities of the equipment to achieve the treatment standards prescribed in AAC R18-13-1415.
- c. Instructions for equipment maintenance, testing, and calibrations that ensure the equipment achieves the treatment standards prescribed in AAC R18-13-1415.
- d. Training manual for the equipment.
- e. Written certification from the manufacturer stating that the equipment, when operated properly, is capable of achieving the treatment standards prescribed in AAC R18-13-1415.

If you have any questions about this letter, please contact me at (602) 771-4581, or toll free at (800) 234-5677, Ext. 771-4581.

Sincerely,



Deepal Gunawardena  
Environmental Engineering Specialist  
Solid Waste Plan Review Unit  
Waste Programs Division

cc. Barbara M. Waterbury, Environmental Program Specialist, PRU