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April 28, 2026

Waterless Toilet Shop
2041 Pabco Road
Henderson, NV 89011

Contact Person: Eemeli Palo

Subject: Product Registration, "Green Toilet" Composting toilet

Dear Mr. Palo:

The Division of Environmental Health has completed a review of a registration application for the subject products. This information was submitted pursuant to Section 7(HH) of the Subsurface Wastewater Disposal Rules (Rules) for registration for use in Maine.

The Green Toilet system consists of wheeled composting bins that are positioned below the toilet and collect the excrement and urine. The bins have a double-base design that separates excess moisture from solid waste. The system can handle significant portion of the urine input with special capillary tray and active ventilation. If urine input exceeds what the Green Toilet composting bin can handle, the excess drains via a hose and is collected.

Pursuant to Section 7(HH) of the Rules, a product must be based upon sound engineering principles and can be expected to provide the same level of protection to public health and the environment as offered by the authorized products presently authorized by the Department for use in these Rules. Sound engineering principles may be demonstrated by submitting a letter to the Department from a) a certifying organization, such as the Building Officials and Code Administrators (BOCA), or other suitable organization stating their approval of the product, or b) the American Society for Testing and Materials (ASTM) indicating the subject product (used as indicated in the request) meets the ASTM standard as specifically listed in the appropriate section of any nationally recognized code, such as BOCA or equal. According to the information you provided, the Green Toilet system has been certified to AS/NZS 1546.2:2008 (On-site domestic wastewater treatment units-Waterless composting toilets).

An independent study found that the composting process eliminated the measurable levels of some indicator bacteria over the period of two-month study.

Sample Date	E coli	Salmonella	Humidity
14-May-2018	26,000 cfu/g	Not detected	79%
14-May-2018 (duplicate)	16,000 cfu/g	Not detected	78%
13-June-2018	6,100 cfu/g	Not detected	75%
13-June-2018	41,000 cfu/g	Not detected	77%
16 July-2018	<10 cfu/g	Not detected	55%
16-July-2018	<10 cfu/g	Not detected	60%

On the basis of the information submitted, the Division has determined that the Green Toilet is acceptable for use in the State of Maine, provided that it is installed, operated, and maintained in conformance with the manufacturer's directions. The following conditions apply:

- 1) This composting toilet is subject to Section 5(M). The collecting bin is subject to Section 5(M)(c), but the urine overflow must be directed to the accompanied greywater system (see Section 5(N)(2). This greywater system must be sized, located and designed according to the Rules.
- 2) The bins must be allowed to compost at a favorable temperature for a period of at least two months. Bins that are emptied outside of these specified conditions, must be placed in a location where the material is separated from human and animal contact, controlled from vermin and located by a Maine Licensed Site Evaluator. No composted human waste is to be used in growing food. Contact the Maine Department of Agriculture (DCAF) for handling recommendations.
- 3) The conditions of Section 5(I) (Primitive and Limited Disposal Systems) apply to this product.

Because installation and owner maintenance has a significant effect on the working order of onsite sewage disposal systems, including their components, the Division makes no representation or guarantee as to the efficiency and/or operation (product). Further, registration of this product for use in the State of Maine does not represent Division preference or recommendation for this product over similar or competing products.

If you have any questions, please feel free to contact me at (207) 287-5695.

Sincerely,



Alexander Pugh, Sr. Environmental Hydrogeologist
Subsurface Wastewater Unit
Drinking Water Program
Division of Environmental and Community Health