

## MEMORANDUM

To: New products file

CC: ECOJOHN (Septijohn), Danny Gardner

From: Alex Pugh, Subsurface Wastewater Unit Manager 

Date: June 17, 2026

Regarding: Current understanding of the permitting required for installing a whole-house wastewater incinerating unit.

---

### **Product description:**

The whole-house wastewater incinerating system is slightly different than the incinerating toilets that the Subsurface Wastewater Unit (SWW Unit) permits under 10-144 CMR Ch. 241. Incinerating toilets collect and incinerate toilet wastes. In contrast, these whole house systems collect and incinerate all the wastewater from the structures plumbing system.

The Septijohn system was permitted as an incinerating toilet in February 2024. This spring the SWW Unit reexamined the product and determined that it does not fit well within the 10-144, Ch. 241 rules (Ch.241).

Incinerating toilets are a component of a structure's wastewater disposal system, and they are connected, by necessity, to the disposal of wastewater in the subsurface. In systems with incinerating toilets, large volumes of wastewater, primarily coming from sinks, showers, and the like, are disposed of in a greywater system, while just toilet wastes are incinerated.

The Septijohn system is dissimilar from the incinerating toilet, because it is a whole house wastewater incinerator system. These systems consist of collecting the wastewater in a tank, pumping the wastewater into the incinerator, and then subjecting the wastewater to high heat, leaving an ash. There is no connection to a subsurface wastewater disposal system or greywater system. Whole house systems like this are not intended to have a subsurface component regulated by Ch. 241. Therefore, whole-house wastewater incinerator systems, like the Septijohn, are no longer listed on the SWW Unit's approved products list.

### **Permitting:**

This memo provides some information about the expected permitting of these whole-house wastewater incinerators. The author's understanding of the Maine DEP permitting process is limited and this memo should not be considered comprehensive.

It is assumed that a Maine Licensed Engineer will be involved in the design of this disposal system as their license may be required in some permitting applications.

These systems consist of collecting the wastewater in a tank, pumping the wastewater to the incinerator, and then subjecting the wastewater to high heat, leaving an ash.

The placement of each of these components will likely require a Maine DEP permit by rule or LUPC equivalent. The Regional Licensing Manager/Division Director of Land Licensing (Bureau of Land Resources) in Augusta or their staff should be able to assist with any questions. It is unlikely that the permitting for a project like this will fall under the Site Location of Development Act, which would require additional oversight. The Maine Shoreland Zoning Act, title 38 §435, requires a minimum standard for shoreland zoning ordinances within towns. The Shoreland Zoning Unit can provide guidance when the town is uncertain and is led by the Land Resources Environmental Scientist IV for Shoreland Zoning.

#### **Tank placement:**

The State of Maine has rules around the placement and use of above ground and underground petroleum tanks but does not have specific rules for aboveground wastewater tanks. Septic tanks, Dosing tanks, and Holding tanks, which are similar to, but not the same as, tanks used in whole house systems, are covered in Ch. 241 in Section 7(A-J). Some requirements of Holding tanks, like monolithic construction and the use of alarms when the filled volume approaches the total volume would be appropriate for permitting these systems (See Ch. 241, Section 8C).

#### **Pump:**

The transport of wastewater to the incinerator may or may not include underground piping. Ch. 241 covers piping in Section 7(M). The manufacturer of the pump will have minimum requirements for the diameter and construction of this piping. The engineer that designs the installation of this system will have specific requirements. It is assumed here that these designs will be stamped by the engineer.

#### **Incinerator:**

Rick Perkins, the Compliance Section Manager in the Air Bureau, reports that the Septijohn incinerators he reviewed would not meet the size thresholds that would require licensing with the Bureau of Air Quality. He did say that the incinerator exhaust would be subject to the visual emissions limits in Chapter 101 of the Department of Environmental Protection's rules. Any evaluation would only be triggered if someone complained. The incinerators would not be on their schedule for inspections.

**Handling of Ash:**

Carla Hopkins, the Director of the Division of Materials Management, does not believe that the ash would require any permits from her division. She recommends disposing of the ash as household waste. Handlers of the ash are cautioned that they should not land apply it due to the ban on land application of septage-derived material in 38 M.R.S. § 1306(7)(A)(2)(b).