

## FUNERAL HOME EMBALMING WASTEWATERS

### Frequently Asked Questions (FAQ)

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#### 1. What I am required to do to comply with the Michigan Department of Environment, Great Lakes, and Energy (EGLE) regulations that apply to embalming wastewaters?

Embalming wastewaters are classified as a medical waste and cannot be discharged to an onsite septic system designed for sanitary wastewaters. If a sanitary sewer is not available, embalming wastewaters must be accumulated and transported to a disposal facility authorized to accept the embalming wastewaters. All embalming wastewaters that must be accumulated and transported for disposal must be managed to meet Part 138, Medical Waste Regulatory Act, of the Public Health Code, 1978 PA 368, as amended (Medical Waste Regulatory Act) and its rules. See the [Medical Waste Pocket Guide](#), which summarizes the primary requirements for managing medical waste and the [Summary of Hazardous Waste Generator Accumulation Requirements](#), which summarizes all of the requirements for managing hazardous waste.

## 2. Who is allowed to haul my embalming wastewaters to a disposal location?

Funeral home embalming wastewaters must be transported in accordance with the Medical Waste Regulatory Act and U.S. Department of Transportation requirements for medical waste. See EGLE's [Medical Waste Transport Requirements Summary guidance document](#) for additional information on transporting medical waste in Michigan.

Neither a septage waste transporter license or a liquid industrial by-products transporter license is needed to pick up and deliver embalming wastewaters to a wastewater treatment plant or location with authorization to dispose of the embalming wastewaters to their wastewater treatment system. Because there is no transporter licensing requirement for medical waste, a vehicle license is not required to transport embalming wastewaters. However, although a septage waste hauler or liquid industrial by-products hauler may transport the embalming wastewater, the following constraints apply when the embalming wastewaters are handled:

- The embalming wastewater may not be land applied. The Medical Waste Regulatory Act prohibits the release of this material into the environment prior to required treatment.
- Any septage waste hauler transport vehicle used to transport embalming wastewaters must be decontaminated prior to transporting septage for land application.
- The embalming wastewater must be transported to an authorized wastewater treatment plant or a receiving location with authorization to dispose of the embalming wastewaters to their wastewater treatment plant.
- The embalming wastewater must be transported without storage or mixing.
- A specific authorization must be obtained from the receiving facility and that authorization shall be provided to the DEQ Septage Waste Program if a septage waste hauler is used to transport or the DEQ Liquid Industrial By-products Transportation Program if a liquid industrial by-products transporter is used for transport.

## 3. Where can my embalming wastewaters go?

Most funeral home embalming wastewaters are discharged directly to the sanitary sewer with approval from the receiving [wastewater treatment plant](#). If direct discharge to the sanitary sewer is not an option, contact the wastewater treatment plant(s) in your area to see if they can assist. You can also check with your existing medical waste vendor to see if they can assist with proper disposal. Sites that have access to municipal wastewater treatment are also regulated by the local wastewater treatment plant receiving the wastewater. For authorization to discharge to the sanitary sewer, contact your local wastewater treatment plant. Keep a record detailing the authorization on file to verify the disposal is permitted. If the authorization is not provided in writing the disposal record should include details of who authorized the discharge of what type of wastewaters, the date the authorization was granted, how long the authorization is effective, and how much may be discharged.

## 4. Why do I need to change things now? I haven't had any problems with my septic tank or drain field and the Local Health Department permitted it years ago.

While no problems may be present on the surface, the discharge of medical waste to an onsite septic system is in direct violation of several state and local regulations. An onsite septic system is designed to handle bathroom, kitchen, and household laundry wastewater strengths and flows. Proper treatment of the components of medical waste (pathogens and chemicals) cannot be guaranteed with the use of an onsite septic system and may be putting public health and the environment at risk. State and local regulations have likely been updated since the installation of some onsite septic systems and this serves as information to help all facilities come into compliance.

**5. Is a handwashing sink that we also clean or rinse instruments in considered a source of medical waste?**

A handwashing sink used to clean and rinse instruments that were used in the embalming process is being used to collect a non-domestic wastewater which may contain medical waste. Wastewaters from the sink should be accumulated and transported for disposal or the practice of using it to clean and rinse instruments should be discontinued.

**6. Does EGLE have standards for holding tanks? Are they reviewed and approved on a case-by-case basis or do we just have to meet the standards?**

EGLE does not review or approve tank or containers selections for accumulating medical waste. The performance standard that must be met is that the tanks and containers must contain the waste and prevent its release. The medical waste regulations define storage as meaning the containment of medical waste in a manner that does not constitute disposal of the medical waste.

Collected embalming wastewaters must be accumulated in tanks or containers that are compatible with the waste and capable to contain the wastewater. They must be labeled with a biohazard symbol or the words “medical waste” or “pathological waste” in letters not less than one (1) inch high. They must be stored in a manner that prevents putrefaction and prevents infectious agents from encountering the air or with individuals. If medical waste is stored outside, it must be stored in a secured area or locked in a container that weighs more than 500 pounds. Actions must be taken to prevent access by vermin or unauthorized individuals. Accumulated medical waste must be shipped for disposal within 90 days of the date medical waste as first placed in the tank or container. For additional details on tank installation, design, and operation, please see our [Liquid Industrial By-Products Holding Tanks Guidance](#).

**7. Does EGLE have standards for containers?**

Where containers or totes are used to accumulate funeral wastewaters, the containers must:

- Be spill, leak, puncture-proof, and impervious to moisture;
- Have sufficient strength sufficient to resist ripping, tearing, breaking, or bursting under normal conditions of storage, handling, or handling;
- Be secured so as to prevent leakage during storage, handling, or transport;
- Kept closed except during active addition of waste to container;
- Meet the U.S. Department of Transportation regulations;
- Be labeled with the date when waste is first added to the container; and
- Marked with a biohazard symbol during storage and handling.

**8. If embalming does not occur at a facility, does the funeral home need to certify that no embalming is conducted at that location?**

No, certification is not necessary. Upon inspection, EGLE or local health department can independently verify locations where embalming does not occur.

### 9. When must the onsite septic system requirements be met?

Sites that currently discharge funeral wastewaters to onsite septic systems need to discontinue the discharge as soon as possible. As detailed in the memo to [rural medical waste producers](#) and the Funeral Homes with Onsite Septic Systems [card](#), commercial-generated (operational) wastewaters need to be diverted to a sealed holding tank or other mechanism approved for use by EGLE. See question 3 for details on where the collected wastewaters can go, question 6 for details on installation of tanks for containing embalming wastewaters, and question 7 for use of containers for containing embalming wastewaters. Failure to meet the onsite septic system requirements is a violation of state regulations and could result in the DEQ seeking an escalated enforcement action against the facility.

### 10. Should the handling and disposal of sharps that are managed separately from embalming wastewaters be addressed separately in the Medical Waste Management Plan and documented separately for handling and disposal?

Yes, the handling and disposal of sharps should be addressed separately in the Medical Waste Management Plan. If the facility has a third-party contract with a medical waste disposal company to remove their sharps, the name of the company and the method of treatment prior to disposal should be indicated in the [Medical Waste Management Plan](#). If the facility has an agreement to take the sharps to a hospital or other medical facility for disposal, this should be indicated in the plan as well. Please refer to the medical waste [inspection checklist](#) for additional information. This checklist is used by the Medical Waste Regulatory Program and Local Health Departments during inspections.

### 11. Am I allowed to install the embalming wastewater holding tank in my garage or basement?

So long as the tank is secure and access is limited to only those authorized and your disposal vendor is able to remove the content of the tank for disposal, you could locate an embalming wastewater tank in a garage or basement. For additional details on specific tank requirements, please see question 6.

- October 29, 2018, [DEQ memo](#) sent to funeral homes regarding the facility wastewater disposal requirements for onsite wastewater systems
- Funeral Homes with Onsite Septic Systems [card](#)
- WMRPD Policy and Procedure Number WMRPD-368-138-03, [Frequently Asked Questions Regarding Medical Waste](#)
- Medical Waste Disposal Services [Vendor List](#)
- The [Michigan Guide to Environmental Health and Safety Regulations](#)

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