



**Dora**  
Department of Regulatory Agencies

Division of Registrations  
Rosemary McCool  
Director

State Electrical Board  
Mark E. Browne  
Program Director

John W. Hickenlooper  
Governor

Barbara J. Kelley  
Executive  
Director

## MEMORANDUM

TO:

FROM: Kye Lehr

SUBJECT: Compost toilets

DATE: *Since Current Code adopted*

While the IPC and IRC does not have a directly worded prohibition to compost toilets, compliance with the following code sections makes a compost toilet prohibitive in nature.

From the International Residential Code/Plumbing Code:

**P2601.2 Connection.** Plumbing fixtures, drains and *appliances* used to receive or discharge liquid wastes or sewage shall be connected to the sanitary drainage system of the building or premises in accordance with the requirements of this code. This section shall not be construed to prevent indirect waste systems.

**P2602.1 General.** The water-distribution and drainage system of any building or premises where plumbing fixtures are installed shall be connected to a public water supply or sewer system, respectively, if available. When either a public water-supply or sewer system, or both, are not available, or connection to them is not feasible, an individual water supply or individual (private) sewage-disposal system, or both, shall be provided.

**P2712.1 Approval.** Water closets shall conform to the water consumption requirements of Section P2903.2 and shall conform to ANSI Z124.4, ASME A112.19.2, CSA B45.1, CSA B45.4 or CSA B45.5. Water closets shall conform to the hydraulic performance requirements of ASME A112.19.6. Water closets tanks shall conform to ANSI Z124.4, ASME A112.19.2, ASME A112.19.9, CSA B45.1, CSA B45.4 or CSA B45.5. Water closets that have an invisible seal and unventilated space or walls that are not thoroughly washed at each discharge shall be prohibited. Water closets that permit backflow of the contents of the bowl into the flush tank shall be prohibited.



**P2712.2 Flushing devices required.** Water closets shall be provided with a flush tank, flushometer tank or flushometer valve designed and installed to supply water in sufficient quantity and flow to flush the contents of the fixture, to cleanse the fixture and refill the fixture trap in accordance with ASME A112.19.2 and ASME A112.19.6.

**P2712.3 Water supply for flushing devices.** An adequate quantity of water shall be provided to flush and clean the fixture served. The water supply to flushing devices equipped for manual flushing shall be controlled by a float valve or other automatic device designed to refill the tank after each discharge and to completely shut off the water flow to the tank when the tank is filled to operational capacity. Provision shall be made to automatically supply water to the fixture so as to refill the trap after each flushing.

From The International Plumbing Code:

**Section 403.1 Minimum number of fixtures.** Plumbing fixtures shall be provided for the type of occupancy and in the minimum number shown in table 403.1. Types of occupancies not shown in table 403.1 shall be considered individually by the code official. The number of occupants shall be determined by the International Building Code. Occupancy classifications shall be determined in accordance with the International Building Code.

**Section 301.3 Connections to the sanitary drainage system.** All plumbing fixtures, drains, appurtenances, and appliances used to receive or discharge liquid wastes or sewage shall be directly connected to the sanitary drainage system of the building or premises, in accordance with the requirements of this code.

**Section 707.2 Sewer required.** Every building in which plumbing fixtures are installed and all premises having drainage piping shall be connected to a public sewer, where available, or an approved private sewage disposal system in accordance with the international private sewage disposal code.

In short the Section 403.1 requires a minimum number of plumbing fixtures, Section 301.3 requires plumbing fixtures to be connected to the sanitary drainage system and Section 707.2 requires a public or private sewer system. There is also chapter 11 in the International Building Code that requires ADA compliant plumbing fixtures and various health department requirements for providing hand washing capabilities.

Also consider the requirement from both IRC and IPC for plumbing fixtures to be third party certified to applicable standards that are either in the body of each code or listed in Chapter 13 of the IPC.

Sincerely,

Kye Lehr  
Colorado State Plumbing Supervisor  
1560 Broadway, Denver, CO 80202  
303 894 2977  
kye.lehr@dora.state.co.us