

Section 7.0: Fats, Oils, and Grease Control Program

7.1 Background

The FOG program has been addressed since 1995 as a part of a state approved pretreatment program. The TSD has a program that advocates and maintains support for certified Environmental Compliance Inspectors for its source control program. Source Control Inspectors are responsible for recording facility based information on routine forms and apply situational discretion to their procedures. Assessments have been made which required grease trap/interceptors for facilities installed according to the Uniform Plumbing Code (cited by Ventura County Building & Safety Code as well). To date, the TSD pretreatment program has not utilized a permitting program for oil & grease generators. The TSD R&R Discharge, Section 4.5 has been utilized for citing "grease" issues at facilities for specific applications (car washes, restaurants, auto repair, etc.). In the progressive development of both the pretreatment program and the SSMP, the TSD will be developing the FOG program under the pretreatment program processes, but provide the specificity and compatibility with the SSMP program by separate, updated, and a more specific Pretreatment Ordinance.

Environmental Compliance Inspectors keep current through attendance at CWEA sponsored and other compliance related seminars, workshops, and training. Staff keeps current through continuously researching inspection material associated with the restaurant, automotive, and FOG inspection programs.

The TSD identifies training needs for staff development in its annual budget and provides adequate funding for tuition reimbursement.

In 2005, the TSD launched a study to assess the impacts of excessive FOG discharges on its sewer system. The study was intended to identify the sources of and recommend measures to control FOG discharges into the system, thereby minimizing FOG-related sewer blockages and overflows in a cost-effective manner. The study revealed that, at the time, approximately 50% of all SSOs were caused by FOG. Major FOG contributors were Food Service Establishments (FSEs) and high density residential dwellings.

The study recommended the establishment of a grease control program that included a more aggressive preventive maintenance program, more extensive sewer inspection and cleaning, and the implementation of a source control program that would restrict the amount of grease from all possible sources.

Following an extensive outreach to and in partnership with the FSEs in the service area, the TSD developed a three-pronged approach to its FOG Control Program, including:

1. Source Control
2. Sewer Cleaning
3. Community Outreach and Education

Recognizing that blockages caused by FOG could result in SSOs and have an adverse impact on public health and the environment, the TSD enacted a FOG Control Program as specified in the TSDs Ordinance No. TCSD-2, Resolution No. T95-1 commonly referred to as the “Rules and Regulations for Sewage Discharge”.

7.2 Regulatory Requirements

Each Enrollee shall evaluate its service area to determine whether a Fats, Oils, and Grease (FOG) control program is needed. If an Enrollee determines that a FOG program is not needed, the Enrollee must provide justification for why it is not needed. If FOG is found to be a problem, the Enrollee must prepare and implement a FOG source control program to reduce the amount of these substances discharged to the sanitary sewer system. This plan shall include the following as appropriate:

- a. An implementation plan and schedule for a public education outreach program that promotes proper disposal of FOG.
 - b. A plan and schedule for the disposal of FOG generated within the sanitary sewer system service area. This may include a list of acceptable disposal facilities and/or additional facilities needed to adequately dispose of FOG generated within a sanitary sewer system service area.
 - c. The legal authority to prohibit discharges to the system and identify measures to prevent SSOs and blockages caused by FOG.
 - d. Requirements to install grease removal devices (such as traps or interceptors), design standards for the removal devices, maintenance requirements, best management practices (BMPs) requirements, record keeping and reporting requirements.
 - e. Authority to inspect grease producing facilities, enforcement authorities, and whether the Enrollee has sufficient staff to inspect and enforce the FOG ordinance.
 - f. An identification of sanitary sewer system sections subject to FOG blockages and establishment of a cleaning maintenance schedule for each section.
 - g. Development and implementation of source control measures for all sources of FOG discharged to the sanitary sewer system.
- 7.2.a An implementation plan and schedule for a public education outreach program that promotes proper disposal of FOG.

Public education outreach and stakeholder involvement is an important part of the TSDs FOG Control Program and is an ongoing effort. Brochures describing the FOG Control

Program and BMPs are distributed to FSEs identified as doing business in the TSD in two languages: English and Spanish. In addition, the TSD maintains an up-to-date website www.triunfosanitationdistrict.com which serves as an additional source of information to the food service industry and the community at large.

The TSD conducts public education regarding proper disposal of FOG through the restaurant inspection program. FSEs are inspected by TSD inspectors in accordance with accepted industry standards. A Restaurant Inspection Report is generated which verifies the location, liquid depth, size, and cleanout frequency of the grease interceptor. Proper disposal documentation is required for the interceptor service and verified by the inspector. Education is conducted during this inspection to ensure the FSE is conducting proper disposal of FOG as well as stormwater related impacts associated with the rendering grease storage, cleaning of mats, and trash enclosures.

7.2.b A plan and schedule for the disposal of FOG generated within the sanitary sewer system service area. This may include a list of acceptable disposal facilities and/or additional facilities needed to adequately dispose of FOG generated within a sanitary sewer system service area.

The TSD does not own or operate any FOG disposal facilities. The FSEs must, at a minimum, collect the waste FOG and prevent the waste FOG discharge into the sewer system by implementing the following BMPs:

1. “Dry wipe” pots, pans, dishware and work areas prior to washing. Use rubber scrapers or paper towels to remove FOG from cookware, utensils, and serving ware.
2. Collect waste cooking oil and store properly in recycling barrels or drums. Use a licensed hauler or recycling facility to dispose of this waste.
3. Use absorbent products to clean under fryer baskets and other locations where FOG may be spilled or dripped.

The TSD does not allow FOG waste haulers to discharge waste FOG into the sewer system either. However, it provides FSEs with a list of licensed grease haulers and rendering companies.

FOG generated during TSD line cleaning and vault cleaning activities is removed from the sanitary system and disposed of at a waste disposal facility outside the TSD sanitary sewer system service area.

7.2.c The legal authority to prohibit discharges to the system and identify measures to prevent SSOs and blockages caused by FOG.

The TSDs R&R Discharge, Section 3-2 provides the legal authority to prohibit FOG discharges by food FSEs. To mitigate SSOs resulting from blockages caused by FOG

accumulation, the TSD implements its Sewer Spill Response Plan (Response Plan). The Response Plan provides guidelines for investigating FOG-related SSOs and taking enforcement and corrective actions to prevent future occurrences.

7.2.d Requirements to install grease removal devices (such as traps or interceptors), design standards for the removal devices, maintenance requirements, BMP requirements, record keeping and reporting requirements.

The TSDs R&R Discharge, Section 4-5 states the following:

“All restaurants or similar establishments shall install an approved grease interceptor which is of sufficient size so as to prevent excessive discharge of grease into the Districts sewage system.”

Installation of grease interceptor(s) is required at all FSEs that have the potential to generate waste FOG unless an exception is granted by the District Manager. Exceptions include restaurant size, meals served per day, seating capacity, dishwashing facilities, and other criteria the District Manager deems applicable.

The design, construction, installation and testing of commercial kitchen grease interceptors or grease traps shall be in accordance with the Uniform Plumbing Code.

FSEs are required to maintain the grease interceptor in an efficient operating condition by periodic removal of accumulated grease including floating material, sludge and solids. The grease interceptors shall be cleaned at a frequency such that the combined FOG and solids accumulation does not exceed 25% of the total liquid depth of the grease interceptor.

BMPs include proper cleaning of equipment and surfaces, proper disposal of FOG, dry cleaning methods, and proper storage and disposal of wastes.

A logbook of grease interceptor cleaning and maintenance practices shall be maintained. Copies of records and manifests of hauled waste FOG or hauled interceptor wastewater shall be maintained in FSEs files.

7.2.e Authority to inspect grease producing facilities, enforcement authorities, and whether the Enrollee has sufficient staff to inspect and enforce the FOG ordinance.

The TSDs R&R Discharge, Section 2-3 provide the TSD with the legal authority to visit and inspect FSEs and monitor the implementation of BMPs. As part of routine inspection activities, inspectors determine requirements and verify compliance with the FOG Control Program provisions. Additionally, information and training materials such as multi-language handouts summarizing the FOG Control Program and lists of licensed grease waste haulers and pretreatment equipment manufacturers are provided to help businesses comply with the TSD R&R.

Section 2-1 provides the TSD with the administration and enforcement authority to ensure FSEs compliance with the TSD R&Rs. TSD employs several inspectors to conduct FSE inspections and to respond to reports of illicit discharge complaints in the TSD sanitary sewer system service area.

7.2.f An identification of sanitary sewer system sections subject to FOG blockages and establishment of a cleaning maintenance schedule for each section.

SSOs caused by blockages from FOG are monitored for location and required cleaning frequency. All blockages are plotted on a GIS Hot Spot map book described in Section 4.1.b of this document. Locations with a high number of FOG blockages are given special investigation, enhanced public outreach, and cleaning status. Sewers prone to FOG accumulation or blockages are given high priority and cleaned more frequently in an effort to prevent FOG-related overflows. All reaches, including “non-problem” sewers, are included in a routine preventive maintenance cleaning schedule.

Scheduled and completed tasks are catalogued and tracked by work orders in the OASIS/SEMS maintenance management system. The maintenance program includes preventive, proactive, predictive, and corrective maintenance, maintenance engineering, source control, and quality control.

OASIS/SEMS is an asset management and maintenance system the Wastewater Collection Systems Department utilizes to manage work, track warehouse parts, and streamline maintenance-related purchases. GIS integration ties the OASIS/SEMS assets to actual field locations, searchable by street address or intersection. This data enables crews to work more efficiently.

7.2.g Development and implementation of source control measures for all sources of FOG discharged to the sanitary sewer system.

The Environmental Programs Group (EPG) investigates potential sources of FOG waste to verify compliance with applicable sections of the TSD R&R and ERP. FSEs are required to comply with source control measures for all sources of grease as specified in the TSD R&R, implement BMPs, install grease interceptors as applicable, and are subject to inspections to verify continuous compliance.

The TSD R&Rs provide the legal authority to visit and inspect FSEs and monitor the implementation of Best Management Practices. As part of routine inspection activities, inspectors from the EPG determine permit requirements and verify observance of FOG Control Program provisions. Additionally, information and training materials such as multi-language handouts, FOG Control Program summary, lists of licensed grease waste haulers, and pretreatment equipment manufacturers are provided to help businesses comply with the TSD R&R.

Installation of a grease interceptor is required at all FSEs that have the potential to generate waste FOG unless an exception is granted by the TSD General Manager.

In the event an industrial discharger fails to comply with the requirements of the TSD R&Rs, the EPG takes immediate enforcement action by applying one or more of the following appropriate enforcement action(s):

- a. Notice of Non-Compliance – During the Restaurant Inspection and identified on the Inspection Report, the inspector will identify any corrective actions observed during the inspection. The inspector will assist the FSE in solutions and BMPs to meet these corrections and establish a timeline to correct them. The inspector will revisit the FSE for a follow-up inspection to verify the corrective actions have been met.
- b. Notice of Violation (NOV) – A notice by certified mail or personal service which identifies the permit condition(s) violated, the circumstances surrounding the violation(s), and provides the FSE with an opportunity to correct the noncompliance on its own initiative.
- c. Within 30 days of the NOV, the FSE is required to conduct an investigation and submit a written response describing the cause of the violation, the actions taken to correct the violation or prevent future violations and the date those corrective actions will be completed.
- d. Telephone Assistance – A telephone call or verbal notification to an FSE official used to address violations, usually of a minor nature. All phone or verbal notifications are documented in the FSEs file.
- e. Exception Revocation – EPG personnel revoke the FSEs exception for cause and require an installation of a grease interceptor.
- f. Cease and Desist Order – An order that requires the FSE to cease a specific activity and implement corrective actions to permanently achieve and maintain compliance. An Order may be issued when an FSE fails to achieve compliance after a NOV is issued or when a pattern of noncompliance is observed.
- g. The TSD may pursue civil and criminal penalties, as well as injunctive relief.

Reference

Triunfo Sanitation District Rules and Regulations for the Sewage Discharge System, June 26, 1995, Resolution No. T95-1.

Triunfo Sanitation District, Source Control Program, Enforcement Response Plan, DRAFT Version: January 16, 2007 sq