



Fats, Oils, and Grease (FOG)

Source Control Program

Fats, Oils, and Grease (FOG) discharged by residential, commercial, institutional, and industrial users present a significant problem to the wastewater collection and treatment systems, causing sewer blockages resulting to sewer overflows (spills).

To address this problem, the Orange County Sanitation District (OCSD) has established a FOG Source Control Program and an Ordinance to regulate Food Service Establishments, which discharge FOG into the sewer system.

The FOG Source Control Program will be implemented on January 1, 2005.

What is the Program Objective?

The objectives of OCSD's FOG Source Control Program for Food Service Establishments are to reduce FOG discharges into the sewer system, prevent sewage spills, and protect public health and the environment. These objectives are in accordance with the California Regional Water Quality Control Santa Ana Region's (SARWQCB) mandate. Food Service Establishments are significant FOG contributors and must share the responsibility for reducing FOG discharges.

What are the Major Requirements of the Program?

- All Food Service Establishments that discharge FOG into the sewer system are required to obtain a FOG Wastewater Discharge Permit. An annual permit fee of \$100 is proposed. However, a limited food preparation establishment is not considered a Food Service Establishment and is exempt from obtaining a FOG Discharge Permit. Exempted establishments are grouped according to limited food preparation activities that do not produce wastewater containing a significant amount of FOG. These activities include reheating, hot holding, or assembly of ready-to-eat food products. A limited food preparation establishment does not include any operation that changes the form, flavor, or consistency of food.
- All Food Service Establishments are required to implement Best Management Practices (BMPs) in their operations to minimize the discharge of FOG to the sewer system.
- All Food Service Establishments are required to pretreat their wastewater using grease interceptors to remove FOG prior to discharge to the sewer system. However, most Food Service Establishments will be granted temporary waivers from this requirement during the next three years, and the waivers may be re-issued on a case-by-case basis. A waiver may not be issued for:
 1. Newly constructed Food Service Establishments;
 2. Food Service Establishments that undergo remodeling or a major change in operations; and
 3. Food Service Establishments that have caused or contributed to grease-related blockage in the sewer

system, or that have sewer laterals connected to hotspots, or that have been determined to contribute significant FOG to the sewer system based on inspection or sampling.

- Variances may be issued to allow alternative pretreatment technology that is, at least, equally effective in controlling the FOG discharge in lieu of grease interceptors. However, Food Service Establishments must demonstrate and justify that it is impracticable to install, operate, or maintain grease interceptors.
- All Food Service Establishments required by OCSD to install grease interceptors or equivalent devices are required to properly operate and maintain the pretreatment system.

How will OCSD Implement the Program?

- Implement and enforce the FOG Ordinance that specifies general prohibitions and restrictions on FOG discharges;
- Administer enforcement measures and costs associated with FOG discharge and blockages;
- Administer a permit program to regulate wastewater discharges from Food Service Establishments;
- Track compliance through inspection of Food Service Establishments, review kitchen Best Management Practices (BMPs) and Grease Interceptor Maintenance Practices, and monitor wastewater discharges;
- Evaluate and screen the results of inspection and reports to ensure compliance with FOG requirements;
- Consistently respond to all types of violations to ensure long-term compliance; and
- Work with Food Service Establishments, when applicable, to evaluate options to pretreat wastewater to reduce FOG prior to discharge to the sewer system.

What are the Bases for Establishing the Requirements?

In developing the requirements for the FOG Source Control Program, OCSD considered the following:

- Technical Findings of the Hotspot Characterization and the Food Service Establishment Characterization Studies: In order to establish reasonable requirements in reducing FOG discharge, OCSD conducted characterization studies to thoroughly understand the nature of the FOG problem within OCSD's Area 7 (includes the City of Tustin and some other unincorporated areas.) These studies helped identify all Food Service Establishment within OCSD's Area 7 that are potential and specific sources of FOG discharges. The studies also provided valuable information on causes and preventions of sewage spills associated with FOG discharges. In addition, an evaluation of existing FOG control technologies was conducted.
- Case-by-Case Considerations vs. "One size fits all": Food Service Establishments will be evaluated individually to determine specific requirements that are applicable and appropriate towards achieving the desired environmental results.
- Balance between Cost and Environmental Benefits: To ensure that the Food Service Establishments are not financially burdened by OCSD's FOG Source Control Program, OCSD established requirements that are cost effective and balanced to achieve reasonable environmental benefits.
- Issuance of Waivers and Variances: To account for flexibility during the FOG Source Control Program implementation, OCSD allows for situations where extenuating circumstances may allow Food Service Establishment to forego installing grease interceptors.
- Experiences from other FOG Source Control Programs nationwide: OCSD evaluated several FOG Source Control Programs nationwide and used program elements/requirements that have been found to be effective and appropriate for our local setting.

What are the Plans to Address the Residential FOG Contribution?

After initial implementation of the FOG Source Control Program for Food Service Establishments, OCSD will embark on a residential outreach program that will educate and inform city residents about the effects of discharging FOG into the sewer system.