

FATS, OILS, AND GREASE (FOG) ORDINANCE



**WDR GENERAL MEETING
APRIL 21, 2004**

Topics and Goals

- WDR Requirements
- What Makes Sense for an Effective FOG Control Ordinance and FSE Program?
- OCSD FOG Control Ordinance Core Guidelines
- Regional Uniformity and Equity

WDR Requirements

■ Legal Authority

- Limit Grease Discharges that May Cause Blockages
 - “Limit fats and greases and other debris that may cause blockages in the sewage collection system” (sec. iii)
- Prohibit FOG Discharges that May Cause SSOs
 - “Prohibit discharges to the system and identify measures to prevent SSOs caused by fats, oils, and grease blockages of sewers” (sec. viii)
- Inspect, Enforce and Provide Sufficient Staffing
 - “... to inspect grease producing facilities, enforcement authorities, and sufficient staff to inspect and enforce the grease ordinance” (sec. viii)

WDR Requirements

- Elements of an Effective Program
 - Installation of Grease Removal Devices and BMPs
 - “...may include requirements to install grease removal devices (such as traps or, preferably interceptors), design standards for the removal devices, maintenance requirements, BMP requirements, record keeping and reporting requirements.” (sec. viii)
 - Identify Sewer Line Hot Spots and Establish Cleaning Frequencies
 - “The grease control program shall identify sections of the sewer system subject to grease blockages and establish a cleaning maintenance schedule for each section.” (sec. viii)
 - Implement Source Control Measures for Hot Spots
 - “The program shall develop and implement source control measures, for all sources of grease and fats discharged to the sewer system, for each section identified above.” (sec. viii)

FOG Control Ordinance and FSE Program

- What Makes Sense for an Effective FOG Control Ordinance and FSE Program?
 - Kitchen BMPs
 - Logical BMPs required for all FSEs
 - Grease Interceptors
 - Required for those FSEs that need them
 - New and existing FSEs
 - Require proper maintenance
 - Logical and fair minimum pumping frequency

FOG Control Ordinance and FSE Program

- What Makes Sense for an Effective FOG Control Ordinance and FSE Program?
 - Monitoring and Enforcement
 - Prioritize hot spot areas
 - Inspections of important elements
 - Notices of Violations and gradual enforcement strategy
 - Elevated enforcement for FSEs that cause or contribute to a grease blockage or SSO
 - Allow Waivers and Variances for Special Circumstances
 - Issue Permits

OCSD FOG Control Ordinance Core Guidelines

■ Permitting

- Simple permit for all FSEs explaining the requirements
- Exemption for limited food prep establishments

■ Kitchen BMPs

- Installation and use of drain screens
- Segregation, collection, and recycling of cooking oil
- Disposal of food waste into the trash
- Proper maintenance of kitchen exhaust filters
- Kitchen signage
- Employee training

OCSD FOG Control Ordinance Core Guidelines

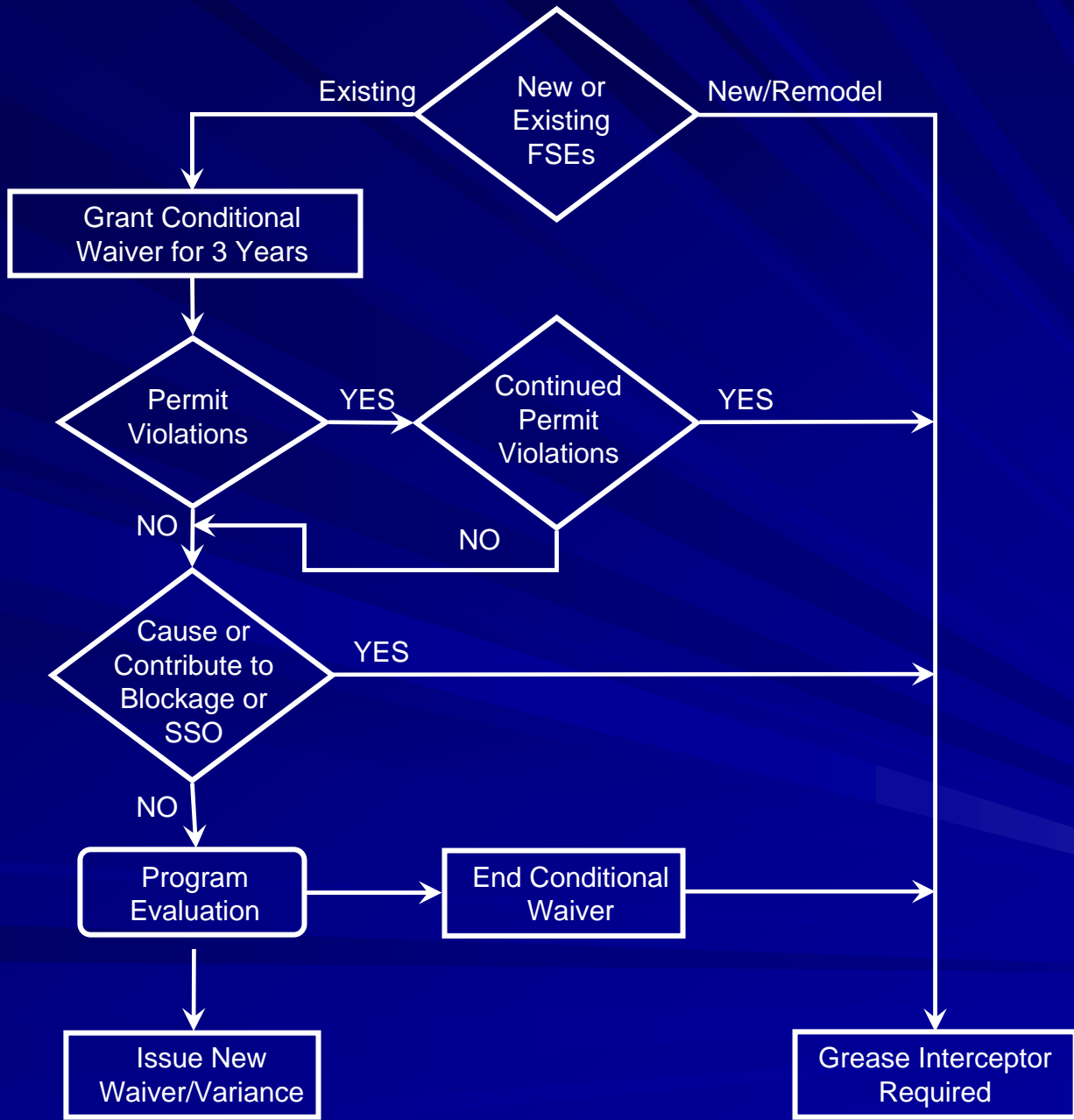
- Grease Interceptors
 - Requirement for new and remodeled FSEs
 - Requirement for standard dischargers
 - Require space and plumbing segregation considerations for insignificant dischargers
 - Requirement for existing FSEs
 - Conditional waiver for insignificant dischargers – no time period
 - Requirement for standard dischargers
 - 3-year conditional waiver for standard dischargers
 - Variance for standard dischargers with an approved alternative pretreatment technology
 - Waiver with grease disposal mitigation fee where interceptor is not feasible

OCSD FOG Control Ordinance Core Guidelines

- Grease Interceptors (cont.)
 - Grease disposal mitigation fee
 - To help recover the costs of increased city/agency sewer maintenance
 - Require proper maintenance
 - 25% rule
 - Full pump-outs and maintain records
 - Verified through inspections
 - 90-day minimum pump out frequency
 - Variance request for 3-6 month frequency
 - Design requirements
 - Follow UPC (CPC)

OCSD FOG Control Ordinance Core Guidelines

- 3-year Conditional Waiver for Existing FSEs
 - Warns all standard existing FSEs
 - Revoke waiver based on certain conditions
 - Encourages Kitchen BMPs
 - Allows consideration for alternatives
 - Allows for program evaluation after other building blocks are in place
 - Reevaluate conditional waiver based on success of the program



What's Next?

- Regional Meeting on April 28, 2004 at 9:00 a.m. at OCSD
 - FOG Control Ordinance and Program Development
- Model Permit Development
- Model Enforcement Response Plan Development