

Chapter 6

Fats, Oils, and Grease Control Program

This chapter of the SSMP discusses the City's FOG Control Program including identification of high frequency maintenance locations and source control.

6.1 Regulatory Requirements for a FOG Control Program

To comply with the WDRs, the City is required to evaluate its service area to determine whether a FOG Control Program is necessary. If deemed necessary, the City is required to develop and implement a FOG Control Program to effectively control the quantity of FOG that is discharged into the City's sanitary sewer system. The FOG Control Program 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, 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; and
- g) Development and implementation of source control measures for all sources of FOG discharged to the sanitary sewer system for each section identified in (f) above.

6.2 Discussion of FOG Control Program

The City prepared and implemented a FOG Control Program in 2005. The program documents its current activities and facilitates the maximum beneficial public use for the City's sanitary sewer system while preventing blockages of the sewer lines and reducing the adverse affects on sewage treatment operations resulting from discharges of FOG into the system.

The City's FOG Control Program summarizes the components of the processes and procedures intended to reduce the quantity of FOG discharged into the City's sanitary sewer system to achieve the goal of minimizing SSOs due to excessive FOG. The key elements of the City's FOG Control Program include:

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- FOG Control Ordinances
- Effluent Limitation & Discharge Requirements
- Kitchen Best Management Practices
- FOG Pretreatment
- Notification, Record-Keeping, & Reporting Requirements
- Grease Interceptor Installation and Operation Requirements
- Grease Trap Operation, Inspection, and Maintenance Requirements
- Waste Hauler Requirements
- Plumbing Permits, Inspection, and Enforcement
- Public Education

To address the components required by the WDRs, the following subsections provide a summary of the applicable FOG control procedures currently being implemented. The complete FOG Control Program is included in Appendix C.

6.2.1 Public Education Program

A component of the City's FOG Control Program has been on source control with a concentrated effort in educating FSE staff and on the negative impacts of putting FOG into the wastewater collection system. During the regularly performed site inspections, City staff provides informative and practical suggestions for reducing the quantity of FOG discharged into the City's wastewater collection, engaging FSE staff in reducing FOG related SSOs. To date, the City's efforts to educate FSE staff has been effective in attaining the desired results from the FSEs.

6.2.2 Disposal of FOG

In addition to the FOG Ordinance, the City has adopted Fats, Oils, and Grease Source Control Program Rules and Regulations to specify appropriate FOG discharge requirements and limitations for FSEs to prevent blockages of sewer lines resulting from discharges of FOG.

Additionally, the Rules and Regulations include BMPs which are simple and effective practices that an FSE can implement to prevent and reduce the quantity of FOG discharged into the sanitary sewer system. The BMPs include specifics for items including, but not limited to, collection, storage and disposal of waste cooking oil; disposal of FOG waste into trash rather than sinks or floor drains; employee training; signage; and availability of spill kits.

The effluent limitations and requirement for the pretreatment of wastewater flows generated at FSEs is also included in the FOG Control Program. General FOG pretreatment requirements are specified in the ordinance. Specifics are included in the Rules and Regulations. The ordinance includes provisions such that existing FSEs are not required to install a grease interceptor, unless the FSE adversely impacts or has the reasonable potential to adversely

impact, the sanitary sewer system by causing or contributing to FOG high maintenance locations, interference, or SSOs.

6.2.3 Legal Authority to Prohibit Discharges

The City's current legal authority to limit and prohibit FOG from entering the City's wastewater collection system is established through its existing municipal codes, regulations, ordinances, and permitting procedures. Section 10.08, Domestic and Industrial Waste, of the City's municipal code, includes the City's requirements and prohibitions pertaining to the use of the City's wastewater collection system.

Specifically, Section 10.08.040, Substances Banned From The Public Sewers, of the City's municipal code, includes a general description of the various types of substances restricted by the City from being directly or indirectly discharged into the collection system. The restrictions are applicable to all users of the City's system. As well, Section 10.08.100 specifically addresses the FOG discharge limitations for FSEs pertaining to the direct or indirect discharge of FOG to the City's sewer facilities.

FOG Ordinance 5950, which serves to adopt the City's Fats, Oils, and Grease Source Control Regulations, also specifies appropriate FOG discharge requirements, limitations, and prohibitions for FSEs to prevent blockages of sewer lines resulting from discharges of FOG. The key elements of the Rules and Regulations applicable to FSEs include implementation of Kitchen BMPs, installation, operation and maintenance of an approved type and adequately sized grease control device, and the notification, record keeping and reports.

6.2.4 Requirements for Installation of Pretreatment Devices

The requirement for the installation of a grease interceptor is a key requirement of the City's municipal code and FOG Rules and Regulations. Figure 4-1 of the FOG Control Program (See Appendix C) describes the evaluation process currently utilized to determine whether installation of a grease interceptor is required.

Sizing and installation requirements for the grease interceptors are determined by the City's Building Division which reviews and approves the sizing and installation of grease interceptors with input from the Public Works Engineering / Development Services Division as a part of the building permit process. The Building Division bases the design and sizing of the grease interceptors on the adopted version of the California Plumbing Code (CPC).

City staff requires compliance with specific sections of the adopted CPC. Cleaning and removal of accumulated grease is required by a licensed waste hauler with an approved license from an authorizing agency. To ensure proper disposal of the collected grease, the FSE is required to maintain copies of hauling documentation.

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6.2.5 Facility Inspection

The City focuses its inspection efforts on “Recall Sites,” FSEs, and establishments that have historically discharged FOG to the sewer system. The inspections serve to ensure compliance with the City’s municipal code, FOG Control Program Ordinances and requirements, and the Fats Oils and Grease Source Control Program Rules and Regulations. Compliance with the City’s municipal code requires that reasonable access to all parts of the FSE be made available when inspection and/or sampling of the wastewater is required.

As part of an agreement with the City, the Orange County Health Care Agency (OCHCA) inspects FSEs for FOG compliance at least once a year during routine health inspections. Follow up inspections are conducted if the OCHCA inspection encounters establishment deficiencies, private SSOs, contribution to a high frequency maintenance location or other violations. BMP inspections are conducted to evaluate compliance with the facility’s best management practices requirements. Enforcement inspections are conducted when increased enforcement is deemed necessary or when the establishment’s Conditional Waiver or Variance is revoked.

Since the City’s proactive maintenance procedures have been successful in minimizing the number of SSOs and addressing the high frequency maintenance locations, the City intends to continue its current FOG Control Program.

6.2.6 Maintenance Schedule for High Frequency Maintenance Locations

The performance and scheduling of preventive, operation and maintenance activities is performed by the existing staff. The Preventive Maintenance Program includes a cleaning cycle for the areas that have been identified by City staff as “Recall-Sites.” The City’s Recall Sites include pipe segments with high FOG, root concentrations, and siphons. The pipe segments within the wastewater system identified as Recall Sites are routinely cleaned on a 30, 90, and 120 day basis based on field observations, historic conditions, or operator / supervisor recommendations.

6.2.7 Development and Implementation of Source Control Measures

Detailed information pertaining to the implementation of the City’s FOG Control Program and the source control measures for all sources of FOG discharged to the sanitary sewer system is included in the FOG Control Program which is included in Appendix C for reference.