

## Element 7 – Fats, Oils and Grease Control Program

### **RWQCB Requirements:**

*Each wastewater collection system agency shall evaluate its service area to determine whether a FOG control program is needed. If so, a FOG control program shall be developed as part of the SSMP. If an agency determines that a FOG program is not needed, the agency must provide justification for why it is not needed.*

### **SWRCB Requirements:**

*Each Enrollee shall evaluate its service area to determine whether a 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, BMP 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.*
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## **Identification and Sewer Cleaning**

To identify and manage FOG sources, the City inspects all restaurants that generate FOG in the City no less often than annually. If the restaurants are improperly maintaining their FOG control devices, they are subject to enforcement actions including escalating fines.

Areas of the collection system subject to grease stoppages (“hotspots”) have been identified and are cleaned on a defined frequency. A list of “hotspots” is included in the **Element 4 Appendix**.

## **Commercial Source Control**

The City has developed a restaurant and food service facilities program to reduce the amount of FOG improperly discharged from these sites. Food service facilities must have a floor sink or other floor mat, container, and equipment cleaning area, which is connected to an approved grease interceptor prior to discharge into the sanitary sewer system. Regular maintenance and cleaning of the grease interceptor is required, and maintenance records can be requested at anytime for review. The food service facility operator must properly contain and dispose of FOG in approved tallow bins. Licensed grease haulers must be used to dispose of FOG in a legal disposal facility. Records of disposal must be maintained and may be requested for review.

The source control inspector conducts unannounced inspections of commercial FOG-producing facilities and has developed the following documents pertaining to these inspections:

- Food Service Grease Trap Inspection Form (**Element 4 Appendix**)
- Keep Grease from Floor Mats Out of the Drain Information Sheet (**Element 4 Appendix**)

Requirements to install grease removal devices are communicated to the restaurant/food related business via the building permit process. Sizing requirements of the Uniform Building Code are enforced through this process.

## **Residential Source Control**

The City is developing a brochure suitable for distribution to residents and for web-based availability on the damaging effects of improperly disposed of FOG. The brochure will list specific steps one can take to prevent FOG from entering the sanitary sewer system. A copy of the brochure will be placed in the **Element 4 Appendix** when it becomes available.

## **Legal Authority**

The legal authority to prohibit discharges to the collection system is documented in the Municipal Ordinance, Title 15. The following sections of this ordinance apply to the FOG control program:

### ***15.48.020 General discharge prohibitions.***

- A. No user shall contribute or cause to be contributed any pollutant or wastewater which will pass through the city's facilities or cause or contribute to interference with the operation of performance of the city's facilities. Any violation of the terms of this part, local limits or a wastewater discharge permit is prohibited and shall constitute interference. This prohibition includes any type of pollutants or wastewater as set forth in the prohibition sections of this part. These general prohibitions apply to all users of the city's facilities whether or not the user is*

subject to national pretreatment standards or any other national, state, or local pretreatment standards or requirements.

- B. A user shall not introduce into the POTW any of the pollutant(s) which cause:
1. A violation of the POTW's NPDES permit or a deterioration of water quality in the receiving stream; or a violation of the POTW's general water reuse permit;
  2. Pass through or interference;
  3. Restrict sludge disposal options or cause a violation of sludge disposal regulations;
  4. Endanger the health and safety of the POTW collection systems employees, POTW employees or the general public.
- C. Affirmative Defenses. A user shall have an affirmative defense in any action brought against it alleging a violation of the general prohibitions established in 40 CFR 403.5(b)(4) if the user can demonstrate that both of the conditions below from 40 CFR 403.5(a)(2) are met:
1. User did not know or have reason to know that its discharge, alone or in conjunction with a discharge or discharges from other sources, would cause pass through or interference.
  2. Directly prior to and during the pass through or interference, the user was in compliance with the existing limits for each pollutant in its discharge, or if there were no such existing limits, the user's discharge directly prior to and during the violation did not change substantially in nature or constituents from the user's prior discharge activity when the city was regularly in compliance with its NPDES permit requirements, and with other applicable requirements for POTW operations including sewage sludge use and disposal. (Ord. 2282 NCS §3 (part), 2007.)

#### **15.48.030 Specific discharge prohibitions.**

In addition, a user shall not introduce any of the following pollutants into the POTW:

- A. High Temperature. Heat in amounts which may inhibit biological activity in the POTW resulting in interference, but in no case heat in such quantities that the temperature at the POTW treatment plant exceeds forty degrees centigrade (one hundred four degrees Fahrenheit) unless the approval authority, upon request of the POTW, approves alternate temperature limits.
- B. Pollutants which cause corrosive structural damage to the POTW, but in no case discharges with a pH lower than 5.0 or higher than 10.5, or having a pH which will cause damage to the collection system or interfere with POTW treatment processes.
- C. Pollutants which create a fire or explosion hazard in the POTW, including, but not limited to, waste streams with a closed cup flashpoint of less than one hundred forty degrees Fahrenheit or sixty degrees centigrade using the test methods specified in 40 CFR 261.21. Any liquids, solids or gases which by reason of their nature or quantity are or may be sufficient either alone or by interaction with other substances to cause a fire or explosion or endanger public safety or interfere with the operation of the POTW. At no time shall two successive readings on an explosion hazard meter, at the point of discharge into the sanitary sewer (or at any point in the system), be more than five percent or any single reading over ten percent of the lower explosive limit (L.E.L.) of the meter, or have a closed-cup flash point of less than one hundred forty degrees Fahrenheit or sixty degrees centigrade using the test methods specified in 40 CFR 261.21. Prohibited materials include but are not limited to gasoline, kerosene, naphtha, benzene, toluene, xylene, ethers, alcohols, ketones, aldehydes, peroxides, chlorates, perchlorates, bromates, carbides, hydrides and sulfides and any other substances which the city, the state and EPA has identified as a fire hazard or a hazard to the system.
- D. Obstruction of Flow. Solids or viscous pollutants in amounts which will cause obstruction to the flow in a community sewer or in the POTW resulting in interference. Items such as but not limited to grease, garbage with particles greater than one-half inch (one and twenty-seven hundredths centimeters) in any dimension, animal guts or tissues, paunch manure, bones, hair, hides, fleshing, entrails, whole blood, feathers, ashes, cinders, wax, sand, spent lime, stone or marble

dust, metal, glass, straw, shavings, grass clippings, rags, spent grains, spent hops, waste paper, wood, plastics, tar, asphalt residues, residues from refining or processing of fuel or lubrication oil, mud or glass grinding or polishing wastes.

- E. *Toxic Pollutants.* Any wastewater containing toxic pollutants in sufficient quantity, either singly or in interaction with other pollutants, that would pass through or cause interference with the wastewater treatment process, or constitute a hazard to human, animal or plant life, including aquatic organisms, or create any hazards in the waters receiving the wastewater treatment plant effluent. A toxic pollutant shall include but not be limited to any pollutant identified pursuant to Section 307(a) of the Act and the California Toxics Rule. Compounds specifically prohibited include any polychlorinated biphenyl (PCB), any pesticide (including any insecticides, herbicides, or fungicides) such as but not limited to chlordane, heptachlor, heptachlor epoxide, aldrin, dieldrin, dichlorodiphenyl trichloro ethane (DDT), dichloro-diphenyldichloro ethene (DDE), and rothane (DPD).
- F. *Noxious or Malodorous Substances.* Any harmful or offensive gases or solids which either singly or by interaction with other wastes are sufficient to violate or have the potential to cause violations of air quality standards at the POTW or in community sewers, create a public nuisance or hazard to life or are sufficient to prevent entry into the sewers for maintenance and repair. Any volatile organic pollutant in such concentration that it has the potential to cause the headspace gases to exceed a three hundred hexane equivalent level over equilibrated wastewater or exceed toxicity discharge screening levels based on fume toxicity.
- G. *Disposal/Reclamation.* Any substance which may cause the POTW's effluent or any other product of the POTW, such as residues, sludges, or scums, to be unsuitable for reclamation and reuse or to interfere with the reclamation process. In no case shall a substance discharged to the POTW cause a violation of the criteria, guidelines or regulations developed under Section 405 of the Act; any criteria, guidelines or regulations affecting sludge use or disposal developed pursuant to the Solid Waste Disposal Act, the Clean Air Act, the Toxic Substances Control Act, or state or local criteria applicable to the sludge disposal.
- H. *POTW Violation.* Any pollutant including oxygen demanding pollutants (BOD, etc.) causing the POTW to violate or continue to violate its NPDES permit. This includes but is not limited to slug discharges, oxygen demanding pollutants (BOD or COD), suspended solids, pH, heavy metals, oil and greases or toxic organic compounds; released in a discharge at a flow rate and/or pollutant concentration which will cause interference with the POTW.
- I. *Detrimental Environmental Impact.* Any substance which may have a harmful environmental impact or create a nuisance in the waters of the state or a condition which violates the rules and regulations of any public agency having regulatory jurisdiction over the city, including but not limited to any statute or any rule, regulation, or requirement of any public agency or state or federal regulatory body.
- J. *Discoloration.* Any wastewater creating discoloration or any other condition in the quality of the POTW effluent such that receiving water quality requirements established by law cannot be met.
- K. *Hazard or Public Nuisance.* Any waste which, as determined by the city, may have an adverse or harmful effect on sewer, maintenance personnel, wastewater treatment plant personnel or equipment, treatment plant effluent quality, public or private property or may otherwise endanger the public, the local environment or create a public nuisance. The city shall, in determining the acceptability of specific wastes, consider the nature of the waste and the adequacy of the collection, treatment and disposal system available to accept the waste.
- L. *Excessive Flow.* Total quantities of flow or instantaneous peaks which due to volume or manner of delivery require a disproportionate share of the city's treatment plant capacity. This also includes flows which, alone or in combination with others, cause excessive treatment costs and/or treatment plant process upsets.
- M. *Radioactive Wastes.* No user shall, and it shall be unlawful to, discharge, cause to be discharged, or permit to be discharged, any radioactive waste into the sanitary sewer, except:

1. *Users authorized to use radioactive materials by the State Department of Health or other governmental agency empowered to regulate the use of radioactive materials may discharge, cause to be discharged, permit to be discharged such wastes; provided, that such wastes are discharged in strict conformance with the current State of California Code of Regulations Title 17 and federal regulations and recommendations for safe disposal of such wastes as they now exist or may hereafter be amended.*
2. *The user so acting does so in compliance with all applicable rules and regulations of all other regulatory agencies having jurisdiction over such discharges.*
- N. *Petroleum oil, nonbiodegradable cutting oil, or products of mineral oil origin in amounts that will cause interference or pass through.*
- O. *Pollutants which result in the presence of toxic gases, vapors, or fumes within the POTW in a quantity that may cause acute worker health and safety problems.*
- P. *Any trucked or hauled pollutants, except at discharge points designated by the POTW.*
- Q. *Any sewage not amenable to treatment as this term is defined herein with the use of the facilities and treatment processes employed by the city at the time of the discharge.*  
(Ord. 2282 NCS §3 (part), 2007.)

#### **Element 7 Appendix**

1. Food Service Grease Trap Inspection Form
2. Keep Grease from Floor Mats Out of the Drain Information Sheet
3. "Fat Free Sewer" Brochure (when available)

## **ELEMENT 7 APPENDIX**

1. Food Service Grease Trap Inspection Form
2. Keep Grease from Floor Mats Out of the Drain Information Sheet
3. "Fat Free Sewer" Brochure (when available)



## CITY OF PETALUMA



City of Petaluma	Department of Water Resources and Conservation	
Grease Removal Device Inspection Fine Policy	Approved By: <i>[Signature]</i>	Effective Date: 6-30-2011

### 1. PURPOSE

The purpose of this document is to set forth food service establishment fines for the violation of section 15.48.130 of the City of Petaluma's Municipal Code.

### 2. AUTHORITY

The City of Petaluma Municipal Code Title 15 – Water and Sewer subsection 15.48.130 Removal Devices Required

The City of Petaluma Enforcement Response Plan - Resolution No. 2007-140 N.C.S.

### 3. POLICY

Food service establishments are required to maintain a Gravity Grease Interceptor (GGI) at twelve (12) inches of total loading or a Hydro-mechanical Grease Interceptor (HGI) at three (3) inches of total loading. Food service establishments are also required to keep records of grease removal device maintenance and cleaning for three years. This information must be available for all on-site inspections. In keeping with the City of Petaluma's Enforcement Response Plan (ERP), any facility that has violated a limit or requirements outlined in Title 15 will receive escalation of penalties.

### 4. PROCEDURES

A representative of the City of Petaluma will inspect food service establishments annually to verify compliance with Title 15. During the inspection the City representative may open the grease removal device to verify loading levels and review hauling and maintenance records for the last three years. Violations will be addressed in accordance to Table A of this document. As a part of the inspection form, the warning notice will be issued to the food service establishment at the time of the inspection. The City's representative will verbally communicate the warning notice to the food service establishment's staff. Fines will be addressed in writing and mailed to the food service establishment's address.

Table A

Violations of Title 15.45.130		
Violation Number	Loading Violation	Record Violation
1	Warning Notice and Reinspection	Warning Notice and Reinspection
2	\$500.00 fine and Reinspection	\$200.00 fine and Reinspection
3	\$750.00 fine and Reinspection	\$500.00 fine and Reinspection
4 or More	\$1000.00 fine and Reinspection	\$750.00 fine and Reinspection

Food service establishments that have received a violation during the previous calendar year will not receive a warning notice and will be issued a fine equivalent to violation number 2 in Table A. All food service establishments must allow entry to City staff in a timely manner for the purpose of inspections. Failure to comply with Title 15 regulations can result up to and including the disconnection of utility services at the discretion of the City of Petaluma.



City of Petaluma  
Food Service Grease Trap Inspection Form

☐ PASS

☐ FAIL

Inspector's Name:

Date:

Business Name:	Contact's Name:
Business Location:	Business Phone #:

Please circle the correct response for all "Yes" or "No" questions.

1. Business Facility sewer is connected to Petaluma Sewer System?	Yes	No
2. Grease Removal Device installed?	Yes	No
3. Type of Grease Removal Device installed:		
4. Estimated volume of Grease Removal Device:	gallons	
5. Estimated level of grease inside trap/interceptor:	inches	
6. On what date was trap/interceptor last cleaned?		
7. Are 3 years of cleaning and maintenance records available onsite?	Yes	No
8. Do you include additives to the trap? If yes, what kind?	Yes	No
9. Is there a food grinder?	Yes	No
10. Does the food grinder discharge to the trap/interceptor?	Yes	No
11. Is there an automatic dishwasher?	Yes	No
12. Does the automatic dishwasher discharge into the trap/interceptor?	Yes	No
13. Where does wash water from floor mat cleaning go? <input type="checkbox"/> Mats are sent to outside service for cleaning. <input type="checkbox"/> No mats used	Sanitary Sewer	Storm Drain
14. Where does wash water from floor cleaning and equipment go?	Sanitary Sewer	Storm Drain
15. Are outdoor dumpsters and recycling containers covered?	Yes	No
16. Is there evidence of leaks or missing drain plugs from dumpsters?	Yes	No
17. Are grease rendering bins utilized for recycling of grease waste?	Yes	No
18. Are there absorbents or other spill cleanup materials readily available?	Yes	No
19. Is there unaccounted for flow, staining or discoloration near or leading to a storm drain?	Yes	No

Recommendations Made/Comments:


☐ Follow-up Inspection Required

☐ BMP Fact Sheet provided

Inspector's Signature:

Contact Signature:

Date Signed:

Note: Hydromechanical grease interceptors (HGI) with 3 inches or more of grease and/or solids is a violation.  
Gravity grease interceptors (GGI) with 12 inches or more of grease and/or solids is a violation.  
Missing or incomplete records of cleaning for 3 consecutive years is a violation.

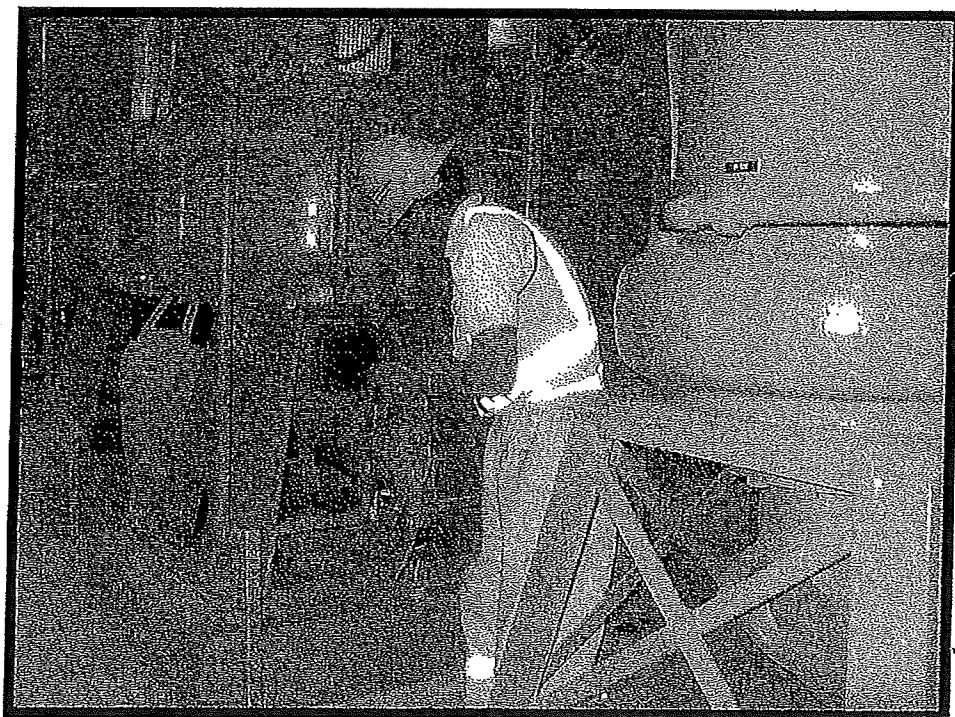
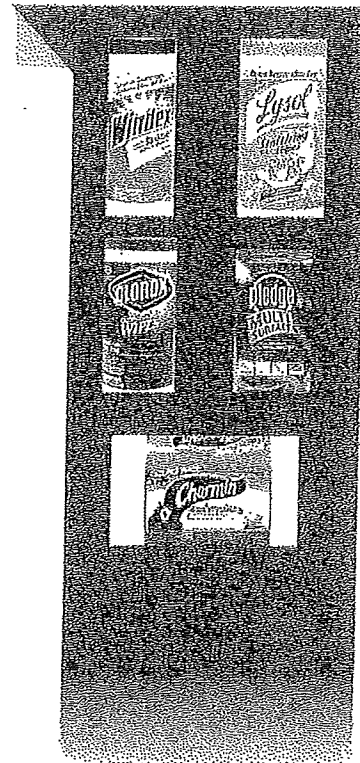


## Toilets Are Not Trashcans!



**Did you know that flushing wipes down the toilet can cause problems in the City's sewer system?**

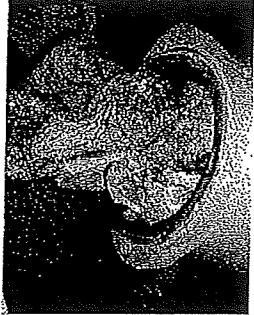
All wipes, (such as sanitary wipes, household cleaning wipes, adult wipes, toddler wipes, baby wipes, etc.), that are labeled "flushable" clog the sewer system contributing to costly clean-ups. The City of Petaluma's Water Resources Department asks everyone to flush only human waste and toilet paper down the toilet. Please throw all waste including wipes in the trash can.



Ellis Creek Water Recycling Facility  
Environmental Compliance Department  
3890 Cypress Drive,  
Petaluma, CA 94854  
Phone: 707-776-3777  
Fax: 707-776-3746

## Keeping Wipes Out of the Sewers!

Did you know that sanitary wipes can cause problems in the City's sewer system? The only items that should go down the toilet are, human waste, and toilet paper. Wipes like baby wipes, adult wipes, sanitary wipe, and household cleaning wipes can cause problems for our City's sewer systems.

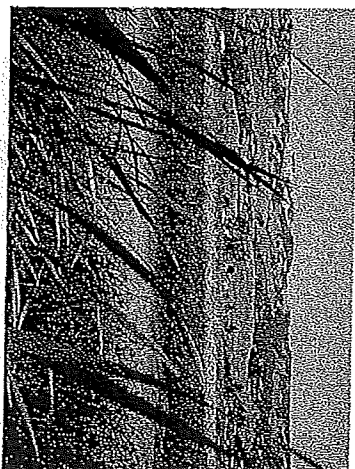


Even the wipes labeled "Flushable" are not truly flushable and cause problems in the collection system.

Flushing wipes down the toilet can potentially affect the maintenance cost of the City's collection system and possibly cause spills into our environment. Daily one of the operators from the Ellis Creek Water Recycling Facility is assigned to clean rags from the screens at one of the City's pump stations, and weekly they need to open pumps to clean rags from within.

Not only could it affect the City's budget but it could also affect your own budget. Wipes can potentially plug your own sewer lateral, and this would be a costly repair that would require the services of a plumber. It is common for tree roots to infiltrate sewer lines and the wipes you are flushing can easily create a clog in your pipes.

The City of Petaluma would like to remind its residents that only human waste and toilet paper can be flushed in your toilet and toilets are not trashcans.

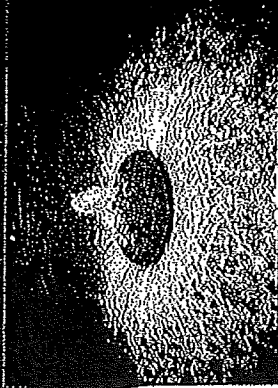


### City of Petaluma

3890 Oprass Dr.  
Petaluma, CA 94954

Phone: (707) 778-4546  
Fax: (707) 778-4508

**Toilets are not  
Trashcans**



**Sanitary  
Wipes  
Should  
Never be  
Flushed**



**Department of Public Works and Utilities**

3890 Cypress Dr.  
Petaluma, CA 94954

Phone: (707) 778-4546  
Fax: (707) 778-4508

**Flushing Wipes  
Clogs Pipes**

*Petaluma's  
Pollution  
Prevention  
Program*

