

SECTION VII

FATS, OILS, AND GREASE CONTROL PROGRAM

Regional Fats, Oils, and Grease (FOG) Control Program

In many sanitary sewer collection systems Fats, Oils, and Grease (FOG) is known to be a significant cause, and or contributor, of sewer blockages in pipe and the cause of operational disruptions and damage to sewage pump stations. Although service areas that include commercial and institutional food service establishments (FSEs) are obvious sources of FOG, residential communities, especially those of medium and high density multi-family residences, can also be a significant source of FOG. It is the purpose of the Regional FOG Control Program to ensure all customers in our service area are in compliance with the District Ordinance, and state and federal requirements, to prevent sewage overflows caused by FOG related blockages in our sewer collection system.

A major component of the Regional Program is the FOG Compliance Program, which used to be performed by the City of San José Environmental Services Department (ESD) on behalf of the District since FY2008-09. The Compliance Program included FSE plan review, facility inspections, and facility staff training/outreach. This service was terminated on June 30, 2017 requiring the District to develop its own Compliance Program including the development of all of the associated training/outreach materials, obtaining the necessary tools and equipment, and providing staff training. A letter to all known FSE business owners was mailed in June 2018 to describe this transfer of responsibility (ref. Appendix D.1). All plans for new or remodeled FSEs that are submitted as part of the District sewer permitting process, is now reviewed by District staff for proper sizing of grease capture devices.

The Regional Program is a comprehensive program that includes the FOG Compliance Program and other related efforts to support the elimination of FOG from both FSE and non-FSE sources. The Regional Program includes:

- FOG Compliance Program and Facility Inspection
- FOG Maintenance and Mapping
- Source Control
- Residential FOG Outreach
- Legal Authority and Enforcement

FOG Compliance Program and Facility Inspection

The District's FOG Compliance Program is specifically created for the oversight of commercial and institutional FSEs and heavily focused on the inspection of grease control devices (GCD), review of GCD maintenance records, and training/outreach. The FSE GCD Standard Operating Procedure (SOP) is attached as Appendix D.2 for reference. The District has a rigorous inspection program that covers all FSEs in its service area. Each facility is inspected on an established frequency with an increased emphasis for those facilities that have a history of non-compliance, or outstanding corrections. Review of the maintenance and pumping records, inspection of the grease control devices, interviews with kitchen staff regarding grease waste handling, food scrap disposal, dishwashing and sink use, and inspection of floor drains, are addressed during the inspection process. The District maintains a database in its Computerized Maintenance Management System (Lucity) that contains all FSE facility information, inspection reports and violation notices.

Training and educational materials are provided on an as-needed basis to FSEs regarding best management practices (BMP) for grease management based on the findings of the inspection process. This is a very important aspect of facility inspection as new owners, managers, and employees are taught the importance of proper grease management and prevention of FOG related SSOs. This training is also very useful for changes in kitchen staff and serves as a refresher for staff who are not familiar with FOG BMPs. The FOG outreach material continues to be enhanced and a version of the best management practices currently being utilized is presented in Appendix D.3.

FOG Maintenance and Mapping

Pipeline cleaning methods and cleaning frequencies are regularly evaluated to ensure its effectiveness. Reviewing cleaning history and noting lines that are prone to FOG dictate how and when those lines should be cleaned and if the current cleaning protocol is adequate. Accumulation of FOG in the District's pump stations have not historically been a significant problem as it serves a very small number of single family homes and is managed regularly through weekly preventive maintenance.

Documentation of the type and quantity of debris removed in each pipeline is made during cleaning operations. Grease is a specific debris type that is tracked as part of the preventive maintenance program, sanitary sewer overflow (SSO) response, or closed circuit television (CCTV) inspection. By identifying these FOG impacted lines on a GIS map, maintenance decisions regarding frequency and cleaning methodology are challenged and modified accordingly. FOG Compliance is also alerted of the suspected FSE FOG source areas for future targeting (ref. Appendix D.4).

Source Control

All plans for new or remodeled commercial FSEs that are submitted for a District sewer permit must be reviewed by the Santa Clara County Department of Environmental Health

(DEH). Using requirements from DEH and the Uniform Plumbing Code, the District reviews submitted plans for properly sized and designed grease control devices. Upon receipt of an approved permit, each FSE is provided a written notification of the requirement to properly maintain grease control device(s) and complete record keeping of each maintenance and pumping activity. Occasionally, an FSE requests a variance on interceptor maintenance and pumping, which is then reviewed by the District to determine if it is warranted and whether approval should be granted.

Sewers that require excessive cleaning, or have a history of stoppages or SSOs caused by FOG are analyzed to determine possible upstream sources of grease. If the suspected FOG source is a permitted FSE, the District will follow up with the facility, or facilities, in an attempt to determine if they are the source of FOG. Based on the results of the inspection(s), the District may issue a notice requiring corrective actions. Foul odors that emanate from an improperly maintained or malfunctioning grease interceptor is another issue that the District monitors.

Residential FOG Outreach

A difficult FOG source to address is the residential FOG component as it is typically originating from many households, or a number of unidentifiable multi-family dwellings. The most effective method of addressing this problem is to provide information to the neighborhood, or specific multi-family facility, to raise awareness of the detrimental effects of improper grease disposal. The District has in the past provided public outreach to residents by distributing FOG related information in strategically identified residential areas using material shown in Appendix D.5. These materials are also available at the service counter at the District office for distribution to the public. Another outreach method is the use of the District's website to provide informative links to FOG related information and issues. The District is considering increased efforts in the future to address multi-family complexes suspected of being a FOG source. This effort will likely involve notification to the facility's homeowners association or facility manager regarding the need to prevent FOG from entering the system and encourage the facility to follow BMPs to reduce FOG contributions to the collection system.

Legal Authority and Enforcement

There are a number of Ordinance Codes that grant the District general authority for enforcement, inspection, termination of service, penalties, etc. Refer to Section III – Legal Authority for a list of applicable Ordinance Codes.

The District has legal authority to prohibit the discharge of FOG as cited in several sections of Ordinance Chapter 7, specifically stated in Ordinance Section 7.140 – Grease, Oil and Fats, Ordinance Section 7.270 - Installation of Grease Control Devices, and Ordinance Section 7.280 – Maintenance and Operation of Grease Control Devices.

There are also legal and administrative remedies to enforce the FOG related Ordinances. Legal remedies are addressed in Ordinance Section 7.420 – Civil Penalties, and Ordinance Section 13.020 – Violation is a Misdemeanor. The administrative remedy is addressed throughout Ordinance Chapter 14 – Administrative Enforcement.