

## ELEMENT 7 - FATS, OILS, AND GREASE CONTROL PROGRAM

The Seaside County Sanitation District has over one hundred seventy (170) food service establishments (FSEs) within its jurisdiction. The breakdown of types of FSEs is graphically portrayed below in Figure 7-1. The District implemented a Grease Source Control Program in 1997; nine years before the adoption of the WDR. The management and implementation of the Grease Source Control Program, which is also known as the Fats, Oils, and Grease (FOG) Control Program, was implemented with the Monterey Regional Water Pollution Control Agency (MRWPCA) in 1997, but since 2000 has been managed by District staff.

The metrics that the District uses to monitor the effectiveness of the FOG Control Program are presented in Element 9 – Monitoring, Measurement, and Program Modifications.

The primary goal of the Seaside County Sanitation District’s FOG Control Program is to decrease the amount of FOG entering the sanitary sewer system to minimize the risk of SSOs.

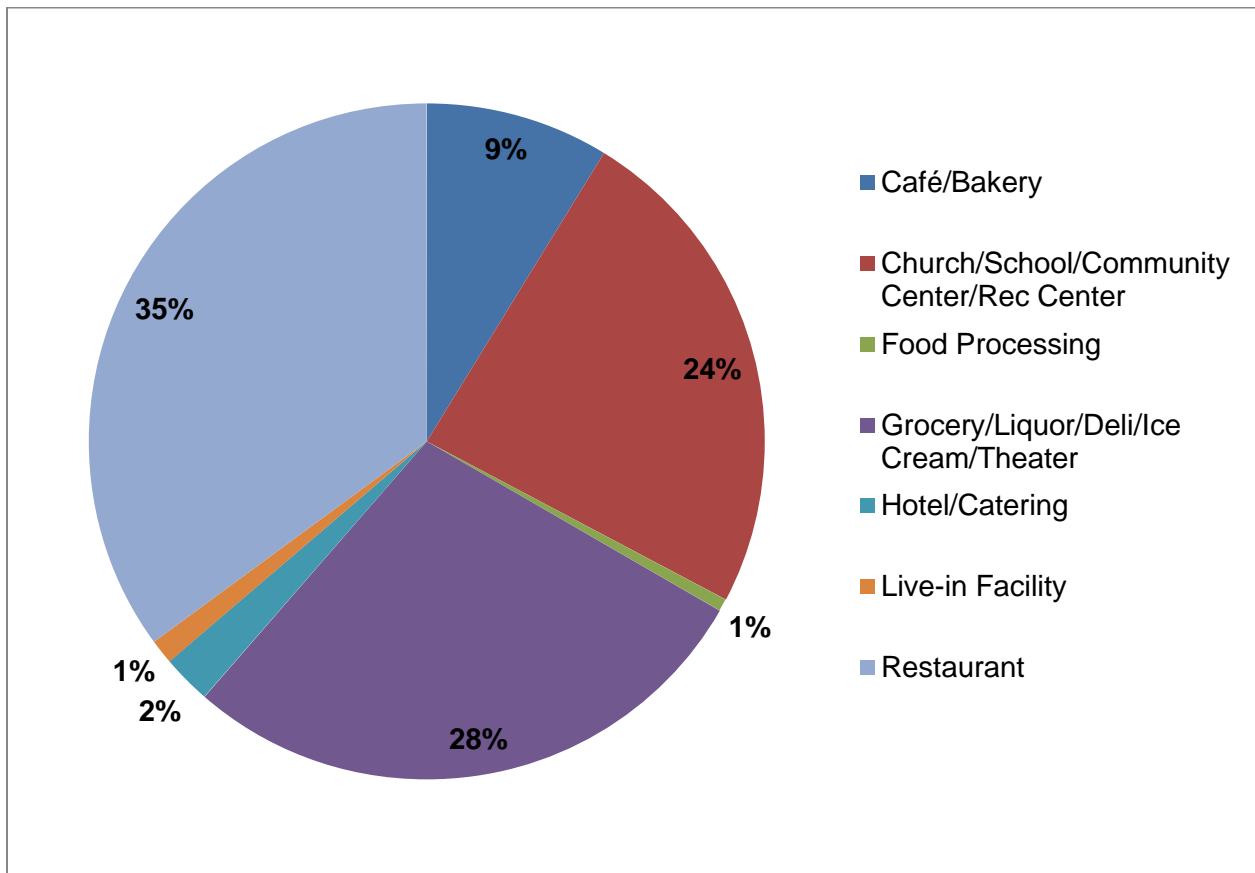


Figure 7-1: Types of FSEs Enrolled in the SCSD FOG Control Program in 2014

### 7.1 Regulatory Requirements

WDR Order No. 2006-0003-DWQ Section D.13(vii) states:

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 as to 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 Agency 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.

## **7.2 FOG Control Program Public Education and Outreach [WDR D.13(vii)(a)]**

The District is part of the Southern Monterey Bay Dischargers Group (SMBDG), which is comprised of the following members:

1. City of Salinas
2. Seaside County Sanitation District
3. Marina Coast Water District
4. City of Monterey
5. Seaside County Sanitation District
6. Castroville Community Services District
7. California American Water
8. Pebble Beach Community Services District
9. Carmel Area Wastewater District
10. County of Monterey

Each member within the SMBDG began contracting with MRWPCA in 2000 to implement a FOG public education outreach program. The public education campaign has historically consisted of eight months of outreach, which has included and continues to include television,

local newspaper, and on-line advertisements, a Facebook page, and a dedicated website, [www.ClogBusters.org](http://www.ClogBusters.org).

The contract and WDR Grease Public Outreach Plan is re-negotiated by the District with MRWPCA each fiscal year and adopted by the District. A copy of the 2013/14 memorandum of understanding and 2013/14 WDR Grease Public Outreach Plans are included in Appendix 7A.

### **7.3 FOG Disposal Facilities [WDR D.13(vii)(b)]**

The District does not own or operate a FOG disposal facility; however, FOG is received for disposal at the MRWPCA plant.

FOG generated by the FSEs is required to be appropriately disposed of periodically at a frequency that meets the District Ordinance No. 15, Section 5(k)(1). This section of the code specifically requires that no collected grease be introduced into any public or private drainage piping. This entire District Ordinance No. 15, entitled “An Ordinance Setting Forth Policies, Procedures, and Requirements for Food Service Establishments Governing Grease Traps, Grease Interceptors or Other Comparable Devices for Oil/Grease Removal, and to Establish Procedures Regarding Implementation and Enforcement,” is available in Appendix 7B.

One seasonal source of FOG is turkey fryer grease during the Thanksgiving and Christmas holidays. MRWPCA distributes flyers and communicates on the Clog Busters website and Facebook the locations that will receive the turkey fryer grease for proper handling and disposal. An image of these and other Clogbusters webpages is included in Appendix 7C.

A list of pumping and/or waste hauling contractors in Monterey County that haul FOG to facilities' such as MRWPCA for disposal is available from the California FOG Tri-Technical Advisory Committee (TAC) Workgroup webpage ([www.calfog.org/Hauler.html](http://www.calfog.org/Hauler.html)), is also included in Appendix 7C.

### **7.4 Discharge Prohibition Legal Authority and SSO Prevention Measures [WDR D.13(vii)(c)]**

The legal authority to prohibit discharges to the collection system and identify measures to prevent FOG-caused SSOs is a joint effort between the District Ordinances and the MRWPCA Ordinances.

The District developed and adopted a separate Ordinance in 2004. The purpose of Ordinance No. 15, is to establish requirements which govern the installation, maintenance, and use of grease interception devices for FSEs in the District.

The District's Ordinance No. 1, Section 30 MRWPCA, incorporated MRWPCA Ordinance 82-02. This MRWPCA Ordinance is amended time to time by MRWPCA, most recently amended and codified as MRWPCA 2008-01, and governs the discharge of any process and/or industrial waste in any part of the District.

During the 2013 SSMP Audit, SCSD staff, and MRWPCA's Gary Weier could not find documentation demonstrating that the SCSD Ordinances incorporate the MRWPCA 2008-01 Ordinance by reference. Legal incorporation of the MRWPCA 2008-01 Ordinance was requested by Mr. Greg Antosz of MRWPCA in a letter to Mr. Tim O'Halloran of SCSD on August 28, 2008. A note on the letter indicates that this incorporation was to be an agenda item for the

SCSD Board on October 14, 2008; a review of this agenda and the agenda's following by the Assistant Engineer, Leslie Llantero, did not turn up a new SCSD Ordinance amending SCSD Ordinance No. 1 to incorporate MRWPCA 2008-01.

In the past five (5) years SCSD has incorporated the MRWPCA Sewer Use Ordinance 2008-01 "in practice;" therefore references to it are included in this SSMP update.

The District plans to amend SCSD Ordinance No. 1 to incorporate MRWPCA 2008-01 by the end of 2014.

For reference, Appendix 7B contains a copy of Ordinance No. 15 in its entirety. Appendix 7E contains a copy of MRWPCA Ordinance No. 2008-01, which is not titled but states that it is an Ordinance establishing regulations for the interception, treatment, and disposal of sewage and wastewater, etc. in its entirety.

Table 7-1 summarizes where the District and MRWPCA have jointly established the legal authorities to prohibit FOG discharges and where measures are identified to prevent SSOs and blockages caused by FOG.

**Table 7-1: Seaside County Sanitation District and MRWPCA FOG Legal Authority**

WDR Requirement	SCSD Ordinance Section or MRWPCA 2008-01 Ordinance Section	Specific Language
Prohibit FOG discharges to collection system	SCSD Ordinance No. 1 – Section 30	<p>No person shall place, deposit or discharge, or cause, suffer or permit to be placed, deposited or discharged either directly or indirectly into any public sewer of this district or into any lateral connected therewith, or on or upon any street, alley or public place, or on or upon any private property or any other place in such a manner that the same will be permitted to run into any such sewer or lateral, any of the following substances:</p> <ol style="list-style-type: none"> <li>1. Any oil, petroleum, naphtha, liquid asphaltum or petroleum product, or other such specifically objectionable matter such as large rags, sand, earth, stone, dust, stone dust, pieces of concrete, etc.</li> <li>2. Any refuse or industrial waste that will cause or tend to cause obstructions in the sewer system or the sewage treatment plant or interfere or tend to interfere with the efficient and successful operation of said system or said plant.</li> <li>3. Any chemicals or waste destructive of masonry.</li> </ol>

WDR Requirement	SCSD Ordinance Section or MRWPCA 2008-01 Ordinance Section	Specific Language
		<p>4. Grease except in quantities commonly contained in domestic sewage.</p> <p>5. Any waste matter in such quantity as to adversely affect the efficient operation of sewer lines, pumping facilities or waste treatment facilities.</p>
Prohibit FOG discharges to collection system	SCSD Ordinance No. 15 – Section 5(k)(1)	FOG General Regulations and Procedures. Maintenance. Traps and interceptors shall be maintained in efficient operating condition by periodic removal of the accumulated grease. No collected grease shall be introduced into any public or private drainage piping.
Prohibit FOG discharges to collection system	MRWPCA – 2.10.2(f)	No person shall discharge any wastewater containing oil and grease of animal, vegetable, petroleum or mineral origin in such quantities to cause or to contribute significantly to: 1) disruptions in sewer lines and other collection system components; 2) interference with treatment plant operations; or 3) exceedances for plant NPDES permit limitations. Significant dischargers of oil and grease shall implement best practicable technologies for reducing the oil and grease content of their discharges.
Prohibit FOG discharges to collection system	MRWPCA – 2.01.2.8	The following pollutants shall not be introduced to the Treatment Works or community sewer: any trucked or hauled pollutants (residential septage, chemical toilet wastes, dilute oily wastes, and salt brine solutions are accepted at the Treatment Plant and are jointly regulated under MRWPCA Liquid Waste Ordinance 88-3 [as amended by Ordinance 93-1] and this Ordinance).
Require the installation of grease control devices such as a trap or interceptor	SCSD Ordinance No. 15 – Section 4(a)	Requirement for grease trap, grease interceptor, or other device. A food service establishment or any other business discharging grease, oil, or other similar material shall have an operable grease trap, grease interceptor or other comparable device(s) as determined by MRWPCA and SCSD to be an adequate substitute for a grease trap or grease interceptor.

WDR Requirement	SCSD Ordinance Section or MRWPCA 2008-01 Ordinance Section	Specific Language
Design standards for grease removal devices	SCSD Ordinance No. 15 – Section 5. (a) – (j)	See Appendix 7B for complete language of Ordinance. Section 5(e)(4): If Grease Traps, and Grease Interceptors are not designed in accordance with the Uniform Plumbing Code (UPC) Section 711 and/or Appendix H, they must be designed by a professional engineer, must be consistent with the standards of this Ordinance, and must be approved by the MRWPCA.
Require the maintenance of grease control devices, the implementation of Best Management Practices, and records and reporting.	SCSD Ordinance No. 15 – Section 5(k)(1) – (5)	General Regulations and Procedures Related to Grease Traps or Grease Interceptors. See Legal Authority, Appendix 7B, for SCSD Ordinance 15.  At that time, the requirement to follow FOG Best Management Practices are not included in Ordinance 15 as it was not considered to be appropriate.
Authority to inspect grease producing facilities	SCSD Ordinance No. 15 – Section 5(k)(4)	The District or its designee may perform grease trap and grease interceptor inspections bi-annually, or more often at the discretion of the District should maintenance reports not be received or should a grease trap or interceptor fail to operate properly as indicated by a mainline stoppage within 100 feet of said business.
Authority to enforce grease program requirements.	SCSD Ordinance No. 15 – Section 5(l)	Suspension or termination of Health Permit. The District shall have the discretion to request the Monterey County Health Department (District’s Health Officer) to terminate or cause to be terminated the health permit of any user if any violation of any provision of this Ordinance is found to cause a condition of contamination, pollution, nuisance, or other threat to public health or safety.
Identify measures to prevent SSOs and blockages caused by FOG	MRWPCA – 2.01.2.3	Specific Prohibitions: 3. The following pollutants shall not be introduced into the Treatment Works or community sewer: solid or viscous pollutants in amounts which will cause obstruction to the flow in the Treatment Works resulting in interference.
Identify measures to	MRWPCA –	No person shall discharge any wastewater:

WDR Requirement	SCSD Ordinance Section or MRWPCA 2008-01 Ordinance Section	Specific Language
prevent SSOs and blockages caused by FOG	2.10.2.f	containing oil and grease of animal, vegetable, petroleum or mineral origin in such quantities to cause or to contribute significantly to: 1) disruptions of sewer lines and other collection system components; 2) interference with treatment plant operations; or 3) exceedances of plant NPDES discharge limitations. Significant dischargers of oil and grease shall implement best practicable technologies for reducing the oil and grease content of their discharges.

**7.5 Grease Removal Devices Design, Installation, and Maintenance Requirements [WDR D.13(vii)(d)]**

The table below summarizes where the District and MRWPCA have jointly established the legal authorities to meet the above FOG Program requirements.

**Table 7-2: Grease Removal Device Design, Installation, and Maintenance Requirements [WDR D.13(vii)(d)]**

WDR Requirement	District Ordinance Section or MRWPCA 2008-01 Ordinance Section	Specific Language
Require the installation of grease control devices such as a trap or interceptor	SCSD Ordinance No. 15 – Section 4(a)	Requirement for grease trap, grease interceptor, or other device. A food service establishment or any other business discharging grease, oil, or other similar material shall have an operable grease trap, grease interceptor or other comparable device(s) as determined by MRWPCA and SCSD to be an adequate substitute for a grease trap or grease interceptor.
Design standards for grease removal devices	SCSD Ordinance No. 15 – Section 5. (a) – (j)	See Appendix 7B for complete language of Ordinance. Section 5(e)(4): If Grease Traps, and Grease Interceptors are not deigned in accordance with the Uniform Plumbing Code (UPC) Section 711 and/or Appendix H, they must be designed by a professional engineer, must be consistent with the standards of this Ordinance, and must be approved by the MRWPCA.
Require the	SCSD Ordinance	General Regulations and Procedures Related to



WDR Requirement	District Ordinance Section or MRWPCA 2008-01 Ordinance Section	Specific Language
maintenance of grease control devices, the implementation of Best Management Practices, and records and reporting.	No. 15 – Section 5(k)(1) – (5)	Grease Traps or Grease Interceptors. See Legal Authority, Appendix 7B, for SCSD Ordinance 15.  At that time, the requirement to follow FOG Best Management Practices are not included in Ordinance 15 as it was not considered to be appropriate.

**7.6 FOG Control Program Inspection, Enforcement, and Staffing [WDR D.13(vii)(e)]**

The Seaside County Sanitation District’s FOG Control Program Inspection and Enforcement legal authorities are described in Section 7.6.1 below and FOG Control Program staffing is described in Section 7.6.2 below.

*7.6.1 FOG Control Program Inspection and Enforcement*

Table 7-3 summarizes where the District and MRWPCA have jointly established the legal authorities to inspect grease producing facilities. The District is responsible for enforcement as outlined by District Ordinance No. 15.

**Table 7-3: FOG Control Program Inspection and Enforcement Legal Authorities**

WDR Requirement	District Ordinance Section or MRWPCA 2008-01 Ordinance Section	Specific Language
Authority to inspect grease producing facilities	SCSD Ordinance No. 15 – Section 5(k)(4)  MRWPCA – 4.07	The District or its designee may perform grease trap and grease interceptor inspections bi-annually, or more often at the discretion of the District should maintenance reports not be received or should a grease trap or interceptor fail to operate properly as indicated by a mainline stoppage within 100 feet of said business.  4.07 - <i>Inspection and Sampling</i> – The Agency shall inspect the facilities of any user to ascertain whether the purpose of this Ordinance is being met and all requirements are being complied with. Persons or occupants of premises where wastewater is created or discharged shall allow the Agency's representative ready access at all reasonable times to all parts of the premises for the



WDR Requirement	District Ordinance Section or MRWPCA 2008-01 Ordinance Section	Specific Language
		<p>purposes of inspection or sampling or in the performance of any of their duties. The Agency shall have the right to set up on the user's property such devices as are necessary to conduct sampling or metering operations. Where a user has security measures in force which would require proper identification and clearance before entry into their premises, the user shall make necessary arrangements with their security guards, that upon presentation of suitable identification, personnel from the Agency will be permitted to enter without delay for the purpose of performing their specific responsibilities.</p>
<p>Authority to enforce grease program requirements.</p>	<p>SCSD Ordinance No. 15 – Section 5(l)</p>	<p>Suspension or termination of Health Permit. The District shall have the discretion to request the Monterey County Health Department (District's Health Officer) to terminate or cause to be terminated the health permit of any user if any violation of any provision of this Ordinance is found to cause a condition of contamination, pollution, nuisance, or other threat to public health or safety.</p>

7.6.2 FOG Control Program Staffing

Table 7-4 names the District and MRWPCA Staff involved in the District's FOG Control Program and outlines their FOG Program roles and responsibilities.

**Table 7-4: Seaside County Sanitation District FOG Program Staffing**

Name and Title	FOG Program Responsibilities	Contact Information
John Dunn  District Manager  <i>Seaside County Sanitation District</i>	The District Manager directs the management of all eleven (11) SSMP Elements.	(831) 899-6203 Office  E-mail: JDunn@ci.seaside.ca.us
Scott Ottmar, PE  Junior Engineer  <i>Seaside County Sanitation District</i>	The Junior Engineer is responsible for requesting by a letter from the District the Annual FOG Maintenance Records from the FSEs.  FSEs that do not annually submit their FOG maintenance record are subject to enforcement.	(831) 899-68885 Office  E-Mail: SOttmar@ci.seaside.ca.us
Position Vacant  Community Relations Specialist  <i>Monterey Regional Water Pollution Control Agency – Contract with District</i>	The MRWPCA Community Relations Specialist conducts residential and commercial outreach via newspaper articles, television, radio ads, and management of the Clogbusters website.	(831) 645-4604 Office  E-mail:

### **7.7 Grease Problem Area Identification and Sewer Cleaning [WDR D.13(vii)(f)]**

The District's primary control of FOG is through the identification of trouble spots or sewer lines that are likely prone to grease accumulation and targeted cleaning of these areas. The District identifies potential grease problem areas by tracking locations and causes of dry weather blockages and SSOs. Element 4, Operation and Maintenance Program, Appendix 4C lists the hot spots for grease that are treated with grease liquefier throughout the District. Hot spot areas are areas with a history of FOG blockages.

In addition to cleaning all the District lines annually, the forty-eight (48) hot spots identified in Appendix 4C receive extra attention. A product known as "Sewer Compound XXX" is inserted into manholes once a month where hot spots exist and the area flushed using heat and turbulence created by this product. It dissolves and liquefies all organic clogs including animal and vegetable fats and oils. The District also uses a product called "Jet Power II" on a semi-annual basis. It is mixed with water and inserted into the problem line by means of the District's high pressure vehicles. It is a non-corrosive, biodegradable, non-acidic, non-caustic chemical that is treatment plant friendly.

### **7.8 Source Control Measure Development and Implementation [WDR D.13(vii)(g)]**

As of this SSMP update, the District has determined that additional source control measure development and implementation is not needed.