

F.O.G PROGRAM



FREQUENTLY ASKED QUESTIONS

1. What is F.O.G and where does it come from?

- FOG (Fats, Oils, and Grease) is the common term for animal fats and vegetable oils. FOG gets into the sewers mainly from restaurants or Food Service Establishments (FSE's) that do not have adequate FOG control measures in place.
- FOG is a natural result of cooking and is usually found in butter and margarine, baking goods, cooking oil, dairy products, food scraps, lard, meat fats, etc.
- FOG enters the plumbing system through kitchen sinks and floor drains in food preparation areas and sticks to the insides of sewer pipes. Over time, FOG builds up and eventually clogs the entire pipe causing sewage spills.

2. Why is F.O.G a problem?

- Sewage spills, also known as Sanitary Sewer Overflows (SSO's), frequently occur in Orange County, including Fullerton, and are commonly caused by FOG blockages. Sewage spills contain high levels of bacteria and pollutants and can pose a threat to public health.
 - Most sewage spills are preventable with adequate FOG source control measures and operation, and by regular maintenance of the sewage collection system.

3. Why is the City implementing a FOG Control Program?

- Concerned with the potential public health and environmental impacts associated with sewage spills the Santa Ana Regional Water Quality Control Board issued an enforcement order in April 2002. The order mandates cities and sanitary agencies to design an effective Sewer System Management Plan. The plan requires the implementation of a fats, oils, and grease (FOG) Source Control Program.

4. What is the FOG program objective?

- The City of Fullerton's objective is to implement a FOG Source Control Program for Food Service Establishments. The program is designed to reduce FOG discharges into the sewer system, prevent sewage spills and protect public health and the environment. Food Service Establishments are a significant FOG contributor and must share the responsibility for reducing FOG.

5. How will the City of Fullerton implement the program?

- Implementing and enforcing a FOG Ordinance that specifies general prohibitions and restrictions on FOG discharges;
- Administering enforcement measures and costs associated with FOG discharges and blockages;
- Administering a permitting program to regulate wastewater discharges from Food Service Establishments;
- Tracking compliance through inspection of Food Service Establishments, reviewing kitchen Best Management Practices (BMP's) and Grease Interceptor Maintenance Practices, and monitoring wastewater discharges;
- Evaluating and screening the results of inspection and reports to ensure compliance with FOG requirements;
- Consistently responding to all types of violations to ensure long-term compliance; and
- Working with FSE's to evaluate options to pre-treat wastewater to reduce FOG prior to discharge to the sewer system.

F.O.G PROGRAM



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6. What is the basis for establishing the requirements?

The City's intent is to comply with the order to implement a practical program for FSE's by establishing reasonable requirements with achievable goals necessary to meet the objectives of the program. In an effort to establish pragmatic requirements for the FOG Source Control Program, the following were considered:

- Technical Findings of the Hotspot Characterization and the FSE Characterization Studies. In order to establish reasonable requirements in reducing FOG discharge, the City conducted characterization studies to thoroughly understand the nature of the FOG problem within Fullerton. These studies helped identify FSE's that are potential and specific sources of FOG discharges. The studies also provided valuable information on causes and prevention of sewage spills associated with FOG discharges. In addition, an evaluation of existing FOG control technologies was also conducted.
- Case-by-Case considerations vs. "One size fits all". FSE's will be evaluated individually to determine specific requirements that are applicable and appropriate towards achieving the desired environmental results.
- Balance between cost and environmental benefits. To ensure that the FSE's are not financially burdened by the City's FOG Program, the City established requirements that are cost effective and balanced to achieve reasonable environmental benefits.
- Issuance of waivers and variances. This allows flexibility during program implementation in situations where extenuating circumstances require the City to forego basic requirements temporarily or permanently to install grease interceptors.
- Experiences from other FOG Source Control Programs nationwide. The City of Fullerton, along with a consulting firm evaluated several FOG Source Control Programs nationwide and used program elements/requirements that have been found to be effective and appropriate for our local setting.

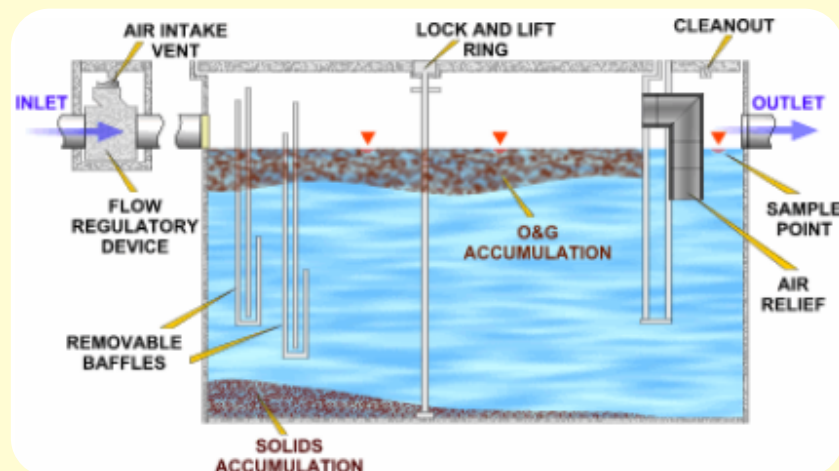
7. How can FOG discharges be minimized?

There are two essential elements for effectively controlling the discharge of FOG:

- The best way to manage FOG is to keep it out of the sewer system by using Best Management Practices (BMP's). BMP's are activities, prohibitions of practices, maintenance procedures and other management practices that reduce the discharge of FOG from the Food Service Establishment's wastewater discharge.
- The installation, operation, and maintenance of properly designed and adequately sized grease traps and interceptors have been shown to be an effective secondary device to control FOG from entering the sewer system.

8. What is a grease trap and how does it work?

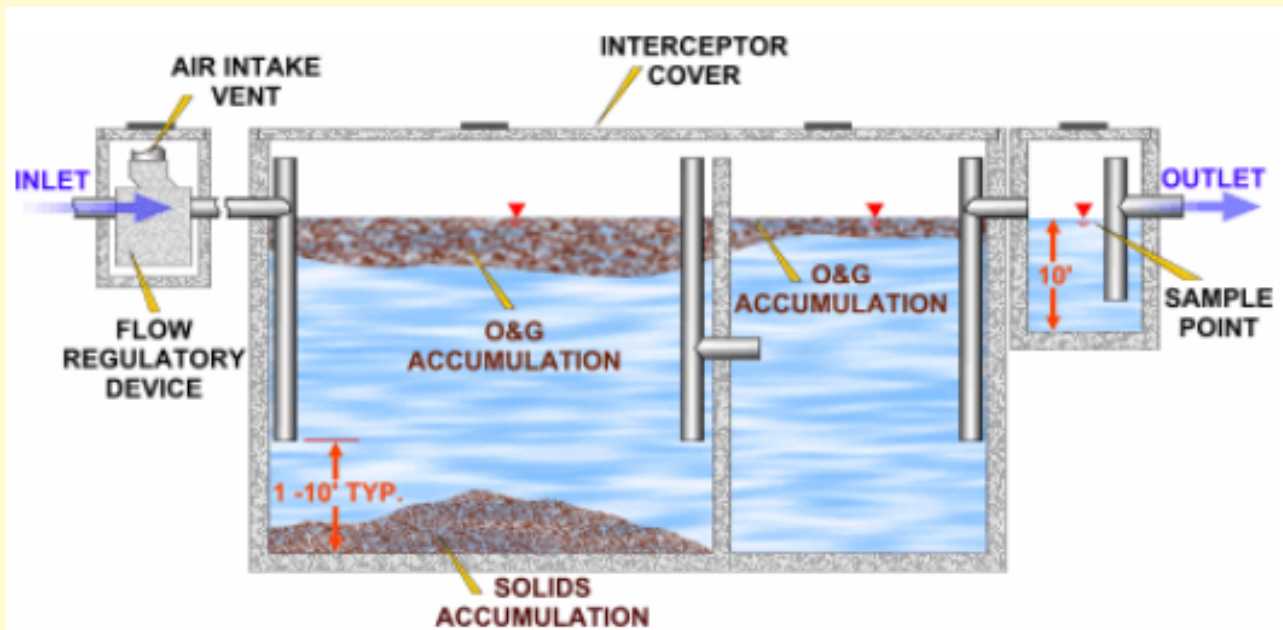
- A trap is a small reservoir built into the wastewater piping a short distance from the grease producing area. Baffles in the reservoir retain the wastewater long enough for the grease to congeal and rise to the surface. The grease can then be removed and disposed properly.



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9. What is a grease interceptor?

- An interceptor is a vault with a minimum capacity of between 500 and 750 gallons that is located on the exterior of the building. The vault includes a minimum of two compartments, and flow between each compartment is through a 90 degree fitting designed for grease retention. The capacity of the interceptor provides adequate residence time so that the wastewater has time to cool, allowing any remaining grease not collected by the traps time to congeal and rise to the surface where it accumulates until the interceptor is cleaned.



10. Do I have a grease trap?

- If the establishment is uncertain whether it has a grease trap or interceptor, the owner should contact the City of Fullerton Maintenance Services Department.

11. Do I need a grease trap?

- Any establishment that introduces grease or oil into the drainage and sewage system in quantities large enough to cause line blockages or hinder sewage treatment is required to install a grease trap or interceptor according to current building codes and ordinances. Interceptors are usually required for high volume restaurants (full menu establishments operating 16 hrs/day and/or serving 500+ meals per day) and large commercial establishments such as hotels, hospitals, factories, or school kitchens. Grease traps are required for small volume (fast food or take-out restaurants with limited menus, minimum dishwashing, and/or minimal seating capacity) and medium volume (full menu establishments operating 8-16 hrs/day and/or serving 100-400 meals/day) establishments. Medium volume establishments may be required to install an interceptor depending upon the size of the establishment. Some of the older buildings do not have grease traps or interceptors, but may be required to install one if the grease discharge results in blockages or hinders the sewage system. As previously stated, the City is working with each FSE on a case by case basis to achieve compliance with the new regulations.

F.O.G PROGRAM



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12. What if I don't install a grease trap?

- If the establishment uses grease and oil in food preparation, it may eventually encounter a maintenance problem with a plugged building sewer line. The blockage can create a sewer backup situation and ultimately a potential health problem. Someone will have to pay for removing the blockage. If the problem is in the building sewer line, the establishment and/or property owner has direct responsibility for the cost of maintenance. If the blockage or restriction is in the public sewer main and it can be proven that the establishment is the cause of the blockage, the establishment may have to pay for the public sewer to be maintained until a trap or interceptor can be installed. In either situation, if sewage is discharged to the public right of way, the City or County agency has a responsibility to respond and protect public health. The responsible party may incur the full cost of response and cleanup by public agency personnel. Blocking a sanitary sewer line is a violation of the City's Municipal Code and the Federal Clean Water Act.

13. How do I clean my grease trap or interceptor?

- Grease trap maintenance is usually performed by maintenance staff, or other employees of the establishment when needed according to manufacturer's instructions. Grease interceptor (GI) maintenance, which is usually performed by permitted haulers or recyclers, consists of removing the entire volume (liquids and solids) from the GI and properly disposing of the material in accordance with all Federal, State, and/or local laws. When performed properly and at the appropriate frequency, grease interceptor and trap maintenance can greatly reduce the discharge of FOG into the wastewater collection system.
- The required maintenance frequency for grease interceptors and traps is specified in the City's ordinance. Frequency also depends greatly on the amount of FOG a facility generates as well as any best management practices (BMP's) that the establishment implements to reduce the FOG discharged into its sanitary sewer system. In many cases, an establishment that implements BMP's will realize financial benefit through a reduction in their required grease interceptor and trap maintenance frequency. Refer to the BMP Fact Sheet for examples of BMP's that FOG generating establishments should implement.
- A list of grease service providers permitted by the Orange County Sanitation District is available on the City's website.
- NOTE: Since the establishment and/or property owner is liable for the condition of their pretreatment devices, the establishment owners/representatives should witness all cleaning/maintenance activities to verify that the interceptor is being fully cleaned and properly maintained.

14. Can you recommend a maintenance schedule?

- All grease interceptors should be cleaned at least once every three months, unless otherwise specified on the Wastewater Discharge Permit. Some establishments will find it necessary to clean their grease traps more often. If the establishment has to clean it more than twice a month to remain in compliance, the owner should consider increasing BMP training.