



7.0 FOG CONTROL 7.1 Introduction

The intent of this section of the SSMP is to evaluate the extent and nature of SSOs related to Fats, Oils and Grease (FOG), to outline the elements of the District’s FOG Control Program and determine the need for additional elements of the District’s FOG Control Program.

7.2 Regulatory Requirements for the FOG Element

7.2.1 RWQCB Requirement:

The collection system agency must evaluate its service area to determine whether a FOG control program is needed. If needed, a FOG control program shall be developed as part of the SSMP. If the District determines that a FOG program is unnecessary, proper justification must be provided.

7.2.2 SWRCB Requirement:

The collection system agency shall evaluate its service area to determine whether a FOG control program is needed. If the District determines that a FOG program is not needed, justification must be provided for why it is not needed. If FOG is found to be a problem, the District must prepare and implement a FOG source control program to reduce the amount of these substances discharged to the sanitary sewer system. The FOG source control program shall include the following as appropriate:

- An implementation plan and schedule for a public education outreach program that promotes proper disposal of FOG;
- 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;
- The legal authority to prohibit discharges to the system and identify measures to prevent SSOs and blockages caused by FOG;
- Requirements to install grease removal devices (such as traps or interceptors), design standards for the grease removal devices, maintenance requirements, BMP requirements, record keeping and reporting requirements;
- Authority to inspect grease producing facilities, enforcement authorities, and determination of whether the District has sufficient staff to inspect and enforce the FOG ordinance;
- An identification of sewer system sections subject to FOG blockages and the establishment of a cleaning maintenance schedule for each section; and
- Development and implementation of source control measures, for all sources of FOG discharged to the sewer system, for each sewer system section identified as subject to blockages.

7.3 Nature and Extent of FOG Problems

The District conducts a commercial FOG source control, inspection, and preventive maintenance program. The District's Source Control Inspectors perform facility inspections of all Commercial and Industrial businesses within the District's sphere of influence, to confirm that these establishments comply with the District's Code of General Regulations, as well as state and local ordinances related to FOG control.

The District experiences no mainline blockages caused by commercially-generated FOG. Therefore, a more formal FOG control program is not currently needed. However, the District is still required to clear blockages caused by residential FOG, and performs residential outreach regarding prevention of FOG disposal into kitchen drains.

7.4 District FOG Control Program

7.4.1 Preventative Maintenance

District personnel performing maintenance activities within the collection system report all observations to the Operations Superintendent. Field reports noting FOG-related observations are forwarded to the Regulatory Compliance Department for follow up investigation, mitigation and or distribution of outreach materials.

7.4.2 Legal Authority to Prevent FOG

The District's "Code of General Regulations," which is included in Appendix 3A, provides the legal framework for enforcing illicit discharges of FOG to the collection system. The Board approved the comprehensive FOG program changes amending the Code of General Regulations in September 2014. This code enables the Water Quality Department to protect the integrity of the collection system by limiting what may or may not be discharged to the system. The FOG Program strengthened the regulations by specifically addressing Best Management Practices, current California Plumbing Codes, Operation and Maintenance of related equipment and Enforcement Actions.

Significant changes to the Code of General Regulations are in sections 602, 707, 902 and revolve around the following enhancements to the Code;

- Strengthening the District's Legal Authority to enforce compliance with the FOG ordinance.
- Provide a mechanism to recover costs of enforcement and compliance. □ Develop Variance Guidelines for Grease Control Devices

7.4.3 Specifically, the District Code provides authority for the following:



Prohibition of grease disposal into sewer system, and Requirement for the installation and maintenance of grease and oil interceptors (Article VI, Section 602)

7.4.4 Source Control Program

The District's Regulatory Compliance Department employs two Source Control Inspectors who perform facility inspections of all commercial and industrial businesses within the District's sphere of influence. One of the functions of this department is to ensure that FOG-related businesses (restaurants, food preparation facilities, vehicle service facilities, etc.) are inspected on a regular basis and maintain consistent compliance with the District's Code of General Regulations, and state and local ordinances related to FOG.

All FOG-related businesses are inspected on a quarterly basis. Facilities noted as "non-compliant" are re-inspected within 30 days and if found "Non-Compliant" upon re-inspection are in violation of the District's code and are subject to \$175.00 fine. In the event that enforcement action is required, the District will issue a "Compliance Time Schedule (CTS)" and work with the Facility Operator until compliance is achieved or schedule required work, place a Tax Lien on the property. Other agencies may become involved in the CTS process, including the San Mateo County Environmental Health Department officials and the City/Town Code enforcement officers, to ensure compliance with regulations in a timely manner.

The District's Source Control Inspectors perform routine inspections of restaurants and vehicle service facilities with grease traps, interceptors, and oil water separators to ensure compliance with the discharge limits of grease and oils per the District regulations. Inspectors perform sampling and flow monitoring, sanitary sewer overflow response, odor complaint response, and inspections to ensure that facilities are in compliance with the District's Code of General Regulations. Staff also works in conjunction with outside agencies, i.e., Fire Department, City of Menlo Park's Code Enforcement and the San Mateo County Environmental Health Department.

The District's Source Control Inspection Program covers approximately 650 commercial and industrial facilities.

7.4.5 Grease Disposal

Currently, grease haulers dispose of grease pumped from interceptors at a grease collection facility, Darling International, Salinas Tallow, or at Silicon Valley Clean Water (SVCW). At this time, there does not appear to be a need for additional grease disposal facilities to collect grease from the WBSD service area. However, the District may choose to evaluate this need further, should the need for additional grease disposal facilities become an issue in the future.



7.4.6 Public Education

At the same time that the District is proactively managing commercial FOG issues, it is also addressing blockages caused by FOG from residential sources. The District has implemented a targeted residential public outreach program for FOG related blockages, using leaflets and information posted on the District's website.