

Improved Control of Fats, Oil, and Grease Through a General Permit for Food Preparation Establishments



Acknowledgements

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- City of Torrington
- Torrington Area Health District

Presentation Agenda

- General Permit
 - Authority
 - Definitions
 - Authorizations
 - Conditions of the Permit
 - Commissioner's Powers
- Guidance for Developing a Local FOG Pretreatment Program
- Summary

Authority

- The DEP issues General Permits under Section 22a-430b and 22a-454(e) of the State General Statutes



Definitions

- Food Preparation Establishment (FPE)
 - Means Class III and IV food service establishments and any other facility deemed to discharge FOG above the set limits such as but not limited to restaurants, hotel kitchens, hospital, school kitchens,...as defined under Section 19-13-B42 of the State of CT Public Health Code.

Definitions

Food Preparation Establishments are categorized by the CT Public Health Codes as follows:

- Class I – Prepackaged foods and beverages
- Class II – Cold or ready-to-eat processed foods,
- Class III – Exposed foods prepared by hot processes consumed within 4 hours
- Class IV – Exposed foods prepared by hot processes held for 4 hours or more

Definitions

Permittee

- Any Food Preparation Establishment which initiates, creates, originates or maintains a wastewater discharge containing FOG under the authority of the General Permit



Definitions

Non-Renderable FOG

- FOG that has been contaminated with detergents, cleaners, or other wastes (brown grease, trap grease)



Definitions

Regional Disposal Site

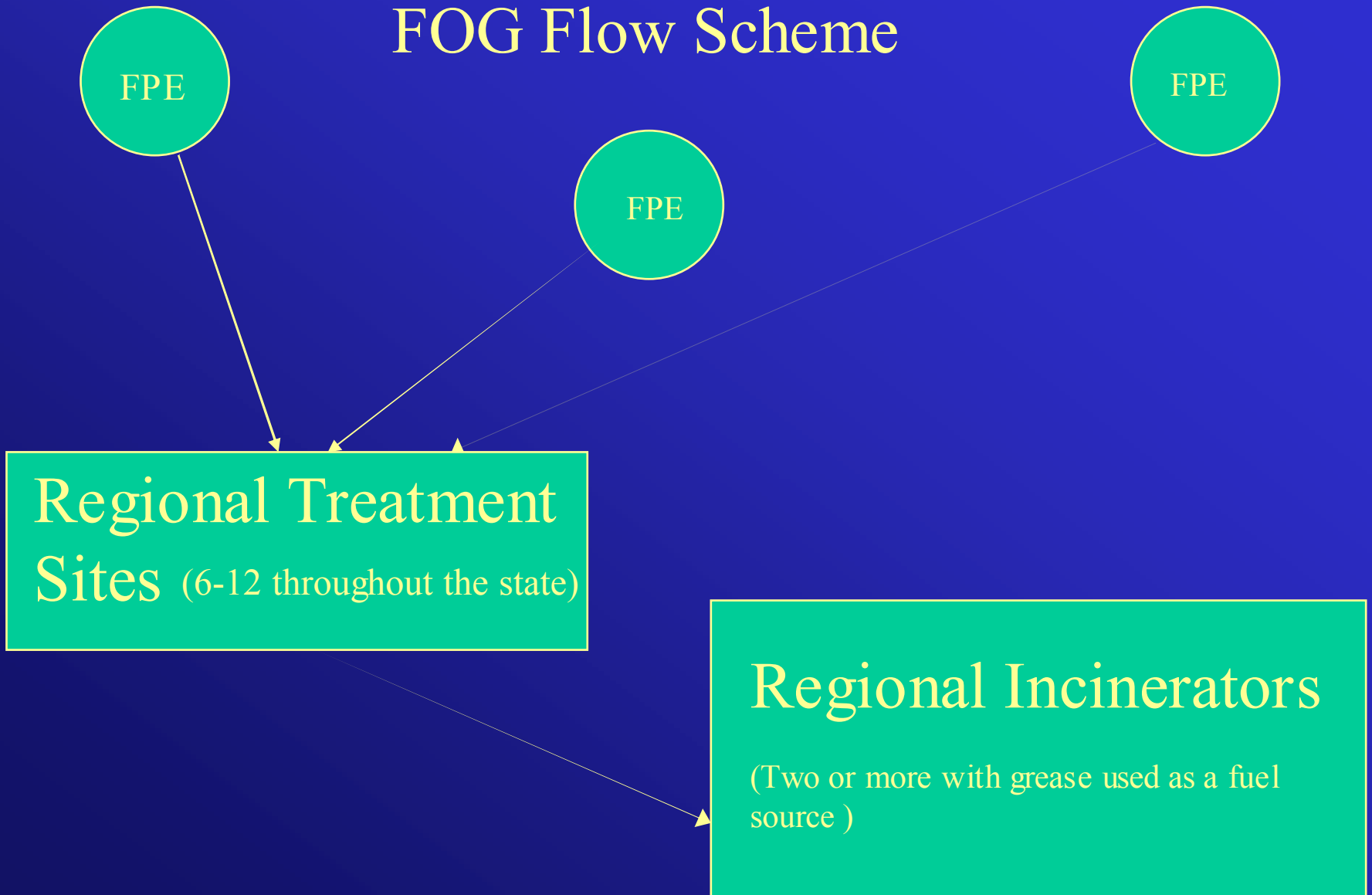
- A Department Approved POTW that provides for separation and disposal by incineration of FOG and food waste from FPE's



Potential Change

- The definition of regional disposal site may be broadened to recognize regional incinerators, regional “fract” tanks and regional transfer facilities for AGRU grease

FOG Flow Scheme



Authorization Under the General Permit

- Eligible Activities – The following discharges from FPEs
 - Discharge to a POTW via sanitary sewer
- Discharges from FPEs to subsurface sewage disposal systems 5,000 gpd or less are regulated by CT DPH and are not covered by this General Permit

Authorization Under the General Permit

- Requirement for Authorization
 - No registration or fee is required under the General Permit (at the State level)
 - Effective Date of the General Permit is yet to be determined
 - Expiration Date is 10 years from effective date



Conditions of the General Permit

- Compliance for existing FPEs required within 3 years of effective date
- Outdoor Grease Trap
 - Grease traps to be installed on separate building sewers servicing only kitchen flows,
 - Kitchen fixtures and drain that must be connected to the grease trap are defined by the General Permit

Potential Change

- The tiered system of outdoor grease trap, indoor grease trap (AGRU) and then other approved unit will likely be replaced with establishing the AGRU and outdoor grease trap as equals.
- The FPE would select either the outdoor grease trap or AGRU.

Potential Change

- Compliance for existing FPEs within 3 years if no grease facility of any kind.
- Compliance for existing FPEs within 5 years if any grease facility exists.
- Compliance for new FPEs at time of opening of business

Potential Change

- Three triggers for earlier compliance dates:
 - Change in ownership
 - Significant renovation of facilities
 - Designation by municipality that FPE discharges to a problem area (past grease blockages, frequent cleanings, TV evidence, etc.)

Conditions of the General Permit

- Indoor Grease Trap (AGRU)
 - Automatic Grease Recovery Units are permitted in locations where outdoor grease traps are not feasible
- Other Approved Unit
 - Other pretreatment units may be used upon approval of WPCA and/ or local Building Official



Conditions of the General Permit

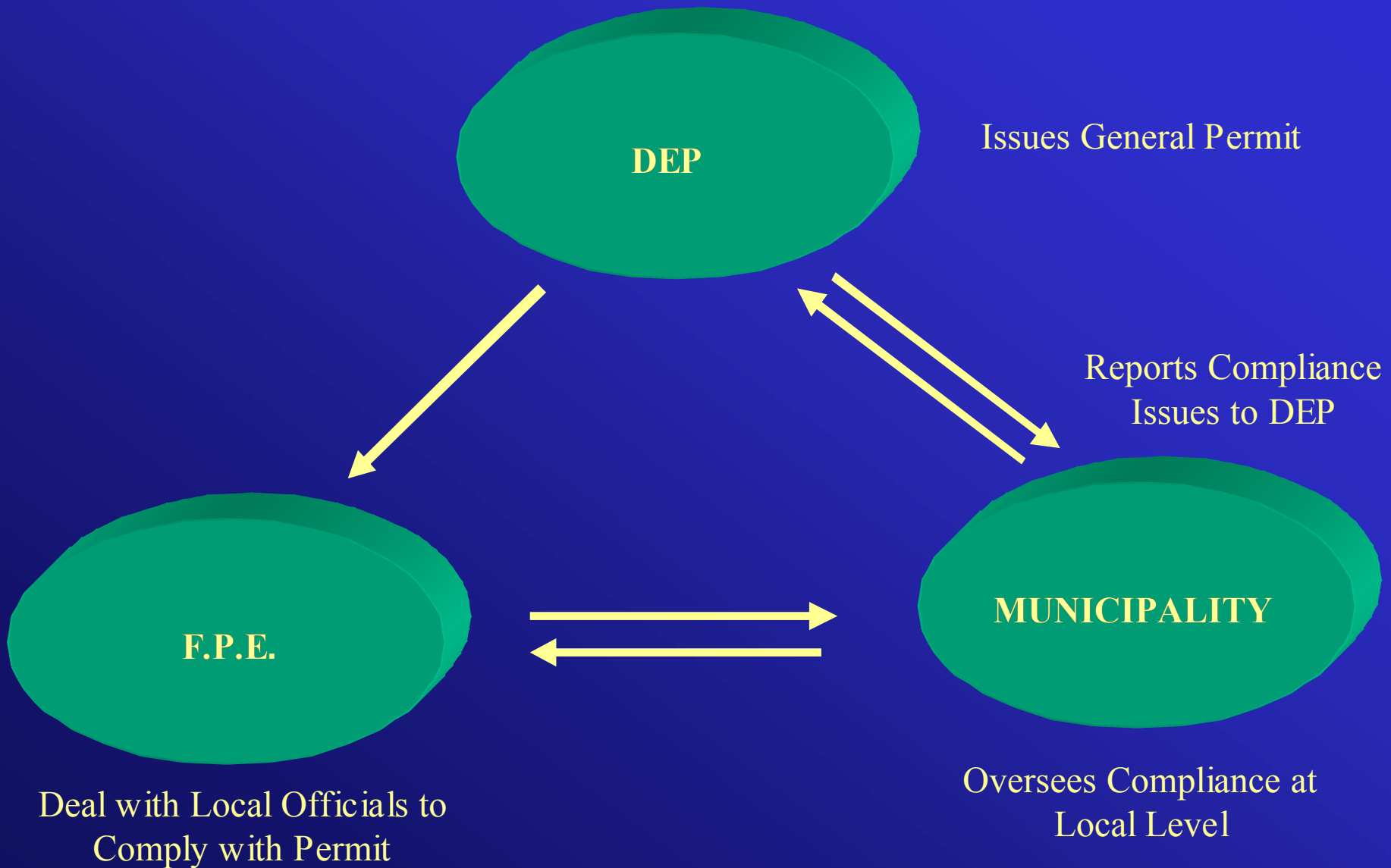
- Best Management Practices
 - Renderable FOG is not to be discharged to pretreatment units, sanitary sewers, on-site disposal systems or storm drains
 - Grease trap inspection and maintenance are to be conducted quarterly
 - A written maintenance and inspection log is required



Conditions of the General Permit

- **Best Management Practices** (continued)
 - Disposal of FOG removed from grease traps is to be at regional disposal sites
 - Physical, chemical or biological manipulation to release grease is prohibited
 - No food grinder or food pulper may discharge to grease traps
 - Screening to prevent solids from entering the grease trap is required
 - AGRUs maintained per the manufactures. recommendations

Implementation Flow Chart



Commissioner's Powers

- The Commissioner of DEP will be responsible for enforcing the General Permit



FOG Pretreatment Programs

- Municipalities will be responsible for setting up and maintaining local FOG Pretreatment Programs
- Each municipality is encouraged to implement a program that meets the needs and capabilities of the community



Assistance Provided by the DEP

- **Guidance Document** – Provides a discussion of elements to be considered in setting up local FOG pretreatment programs
- **Resource Documents** – Provides example documents for FOG pretreatment programs
- **Regional Disposal Sites** – The DEP provides approval and oversight of FOG Regional Disposal Sites

1. Legal Framework

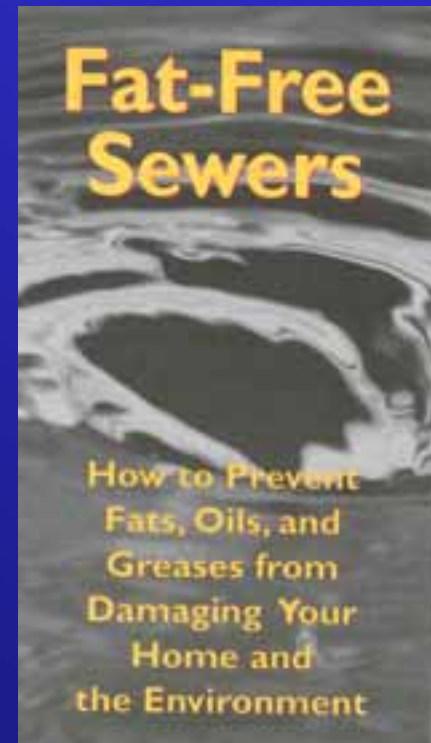
- Guidance Document
 - Local regulations are needed to drive the pretreatment program
 - The Guidance Document discusses possible local agencies that can have primary responsibility for overseeing the FOG Pretreatment Program
- Resource Document
 - Example Sewer Use Ordinance

2. Inventory and Analysis

- **Guidance Document**
 - Identify the current status of FOG discharges and pretreatment within the local program area,
 - Track progress of the pretreatment program.
- **Resource Document**
 - Provides example surveys and registration forms

3. Training & Awareness

- **Guidance Document**
 - Affected parties, including program staff, FPE staff, septage haulers, others need to know the requirements of the FOG Pretreatment Program
- **Resource Document**
 - Provides web links for other program and literature
 - Provides suggestions on currently available literature



4. Permitting and Approval Programs

- Guidance Document
 - Establish a procedure for reviewing local permits and proposed FOG Pretreatment Equipment
- Resource Document
 - Example applications for FPEs to file with Municipality



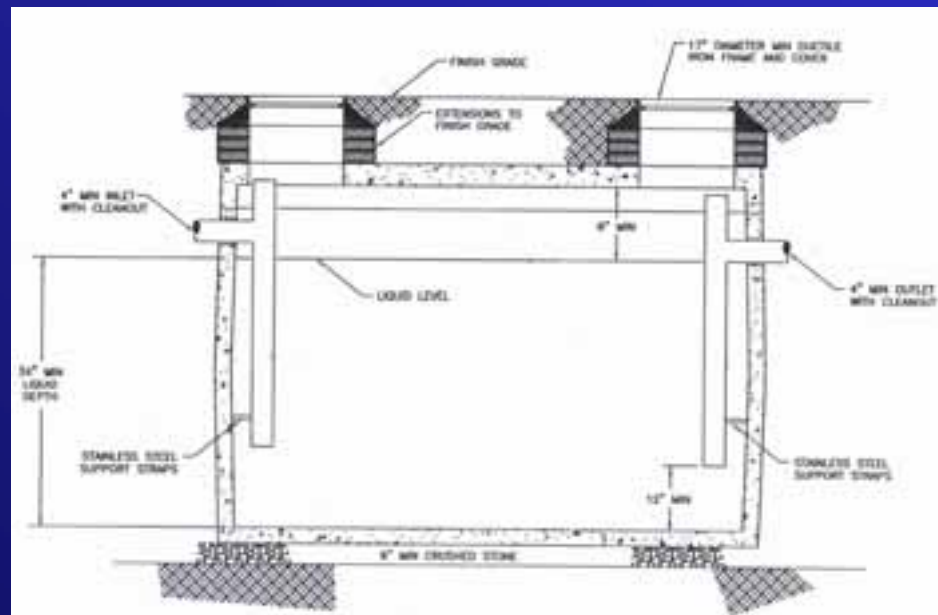
5. Grease Minimization

- Guidance Document
 - Identify methods and incentives for keeping FOG out of the collection system
- Resource Document
 - Provides a list of procedures to be followed to minimize FOG discharge



6. Pretreatment Equipment

- Resource Document
 - Outdoor FOG Interceptor
 - Automatic Grease Recovery Unit (AGRU)
 - Other Approved Alternative



7. Collection and Disposal

- **Guidance Document**
 - The Regional Disposal Sites must be reasonably near FOG generation sites
- **Resource Document**
 - Provides example general information for septage haulers about local programs



Local Collection Facility

8. Monitoring and Record-Keeping

- Guidance Document
 - Provide a method of tracking facilities and determining the improvements made and areas that need additional work
- Resource Document
 - Information on commercially available FOG program software



9. Inspection

- **Guidance Document**
 - Providing oversight for the program, ensure compliance and provide instruction
- **Resource Document**
 - Provides inspection check list and inspector training information



10. Enforcement

- Guidance Document
 - Providing the incentive to ensure a high degree of compliance that is fair and consistent for all parties



11. Financing

- Guidance Document
 - The program will have costs associated with it for the Municipality, the FPE and the septage haulers
 - Identify those costs and methods to minimize or assist the affected parties
- Resource Document
 - CT sales tax exemption forms



What Needs to Be Done to Develop a Program?

1. The General Permit sets the minimum standard for who is regulated, pretreatment equipment requirements, and equipment maintenance.
2. Local Programs can have more stringent requirements.

What Needs to Be Done to Develop a Program?

3. Local programs can decide

- who will oversee the program,
- registration requirements,
- will fees be collected,
- how to provide information to FPE,
- inspection procedures and frequency, and
- enforcement procedures.

What Needs to Be Done to Develop a Program?

4. Guidance Document provides

- Information on the elements that should be considered, and
- Sources of additional information.

5. Resource Document provides

- Example local regulations,
- Example forms, and
- Example procedures.



Questions & Answers

Thanks For Your Attention

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