



# **SAWS Grease Reduction Program: FOG Ordinance**

# Fats, Oils and Grease (FOG)

## Overview

- EPA is focusing on Sanitary Sewer Overflows (SSOs) in cities all over the country
- Historically, 75% of SSOs in San Antonio are attributed to grease and debris



# FOG Sources

- **Animal/Vegetable**
  - Includes meats, dairy products, cooking oils
  - Originates from food preparation and clean-up
- **Petroleum/Mineral Based**
  - Mainly lubricants
  - From auto repair and maintenance shops, car washes, etc.



*This Ordinance covers only  
animal & vegetable forms of FOG*

# Why Regulate FOG?



**Without pretreatment, FOG accumulates in the sewer main and causes SSOs**

# FOG Ordinance Overview

- Part of a multi-stepped approach to reducing SSOs
- Previously, SAWS staff inspect restaurants once every three years
- New goal is to inspect and monitor Food Service Establishments (FSEs) using a tiered inspection approach
- Ordinance establishes easy-to-understand regulations for FSE owners
- Related fee recovers program costs

# Grease Interceptor/Trap Requirements

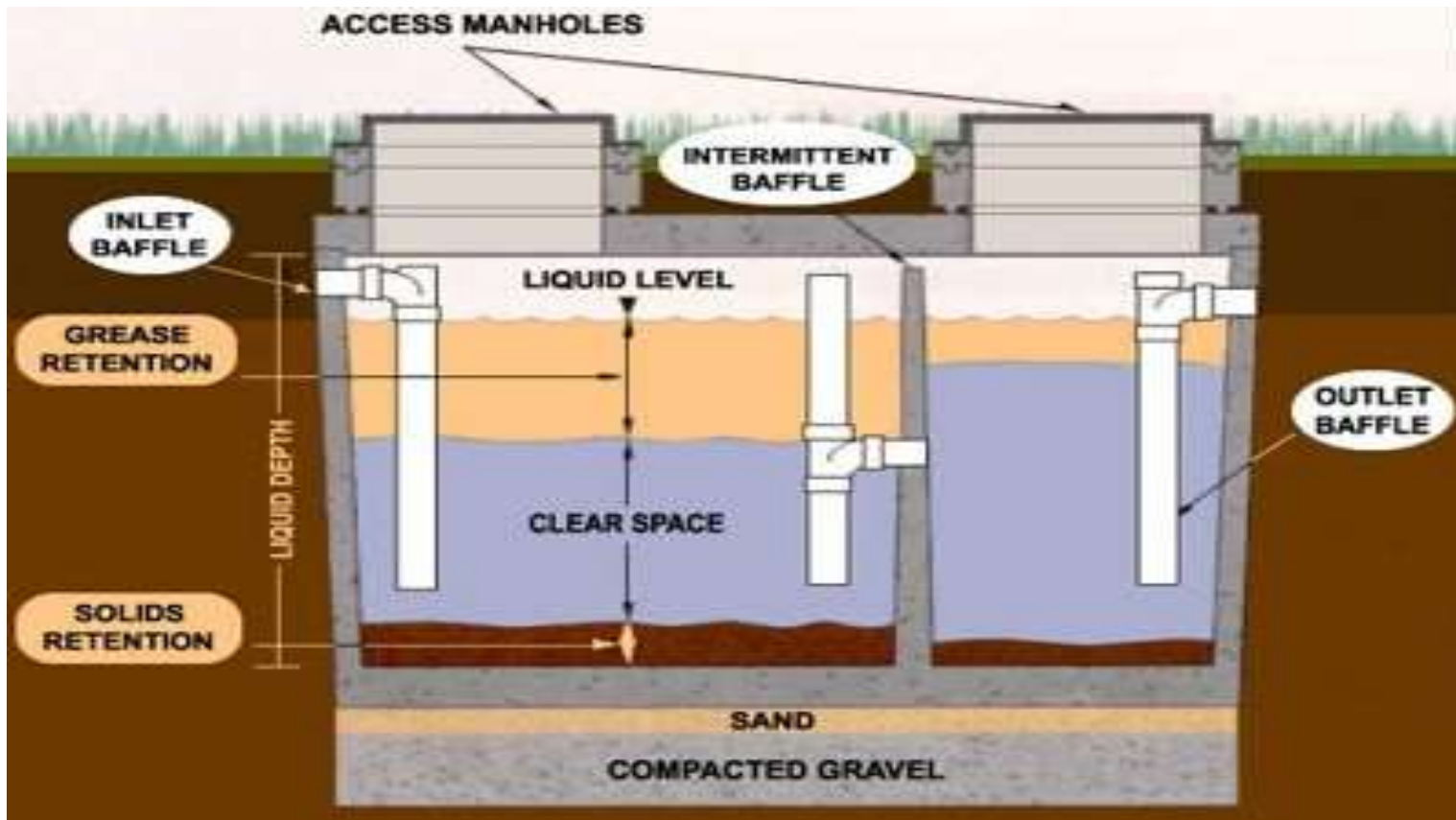
## Sec. 34-526 Interceptors

- Must meet Chapter 24 of City Plumbing Code or International Plumbing Code
- Existing facilities without grease traps must install one
- Small grease traps are grandfathered from new sizing requirements
- Appropriate size required in new facilities
- Grease trap must be accessible for measurement during inspections

# Grease Trap Diagram



# Grease Trap Layout



sampling device measures floatable and solid materials in second manhole



# What is the Standard?

## Sec. 34-527 Maintenance

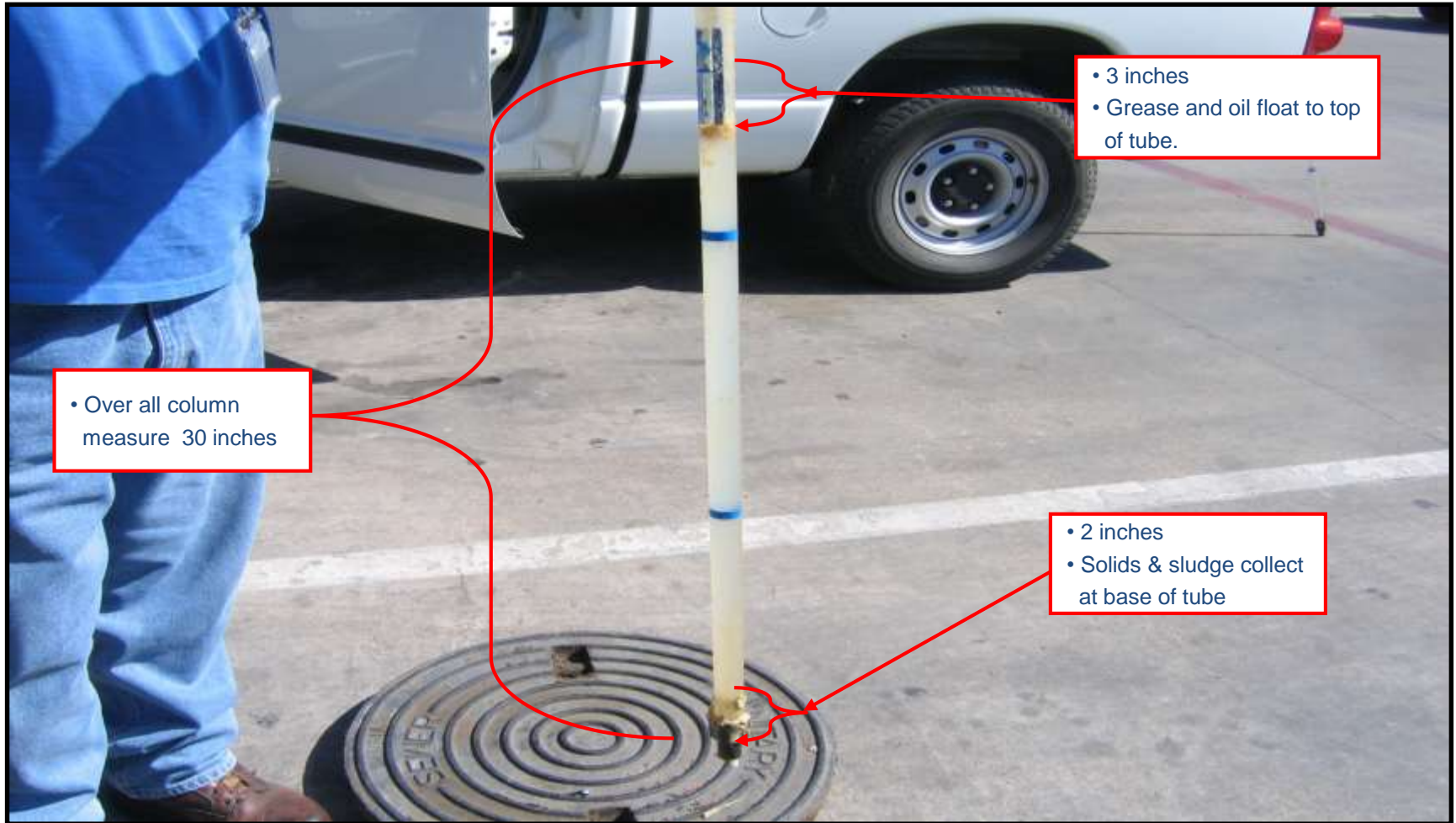
- Wetted height of the interceptor: 25% or more
  - Measured from bottom of the device to invert of outlet pipe
  - Contains floating materials, sediment, fats, oils, or grease
- Exceeding this limit will result in a Notice of Violation (NOV)
- “Sludge Judge” measures materials in grease trap; provides instant reading

# Sludge Judge

Measuring device that works by taking a profile of the contents of a grease trap



# Sludge Judge



# Sludge Judge



Percent solids calculation:

- 30" of water, solids and oil/grease (total depth)
- 3" of oil/grease on top of column
- 2" of sludge/solids at the base of column
- $3" + 2" = 5"$  of solids/non-water components
- $(5" \div 30") \times 100 = 16.6\%$  solids
- 16.6% solids is below the trigger to conduct screenings
- Site is considered compliant on discharge

# Sludge Judge

## Better than old testing method

- Results instantly obtainable
- Saves staff time (more efficient)
- Determines efficiency of grease trap
- Instant determination if FSE is out of compliance, therefore instant notification

# Small Grease Trap

Sample is collected for compliance check



Small grease traps are required to maintain cleaning logs or manifests

# Best Management Practices (BMPs)

- "Dry wipe" pots, pans and dishware prior to washing
- Don't pour grease down the sinks or into the toilet
- Train kitchen staff /employees on BMPs
- Post "No Grease" signs above sinks and front of dishwashers
- Dispose of food waste by recycling and/or trash



# Best Management Practices

- Recycle waste cooking oil
- Cover outdoor grease and oil storage containers
- Routinely clean kitchen exhaust system filters
- Use strainers in sinks to catch food scraps and other solids





# Best Management Practices

- Avoid or limit use of garbage disposals
- Clean under sink grease traps weekly or as needed
- Use a 3-sink compartment dishwashing system
- Keep a maintenance log on grease interceptor/trap maintenance



# Ordinance Focus Areas

- Switch from sampling focus to instant solids measurement
- Analytical results still enforceable
  - Not primary trigger for enforcement
- Manifest tracking still required
- Small grease traps required to perform self-monitoring

## Ordinance Focus Areas (cont.)

- Timeline to correct plumbing defects is 90 days
- Allows storage of manifest at central point by written request
- Allows by-pass up to 18 consecutive hours per written request

# FOG Ordinance Summary

- Improves FOG generator compliance and helps reduce SSOs
- Increases efficiencies, allowing for additional FSE inspections
- User fees pay program cost
- Endorsed by stakeholder groups