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

- 2 inches
- Solids & sludge collect at base of tube

- 3 inches
- Grease and oil float to top of tube.

- Over all column measure 30 inches

SAWS Grease Reduction Program Overview
**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