

SECTION 8. FOG CONTROL PROGRAM

This SSMP section describes the City's fats, oils, and grease (FOG) control program for its wastewater collection system. The major items discussed in this section are as follows:

- Regulatory Requirements
- Public Outreach Program
- FOG Disposal Plan
- Legal Authorities
- Grease Removal Devices
- Best Management Practices
- Enforcement Staff
- Problem Areas
- Problem Area Source Control

REGULATORY REQUIREMENTS

WDR Section D-13-vii requires the following:

The City must prepare and implement a FOG source control program to reduce the amount of these substances discharged to the sanitary sewer system. This plan shall include the components listed in Table 8-1, as appropriate. Also listed in the table are the headings in the body of this section under which the required components are discussed.

Table 8-1. FOG Control Program Requirements

Regulation Number	Heading Under Which Addressed	Required Component
D-13-vii(a)	Public Outreach Program	An implementation plan and schedule for a public education outreach program that promotes proper disposal of FOG
D-13-vii(b)	FOG Disposal Plan	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
D-13-vii(c)	Legal Authorities	The legal authority to prohibit discharges to the system and identify measures to prevent SSOs and blockages caused by FOG
D-13-vii(d)	Grease Removal Devices Best Management Practices	Requirements to install grease removal devices (such as traps or interceptors), design standards for the removal devices, maintenance requirements, BMP requirements, record keeping and reporting requirements
D-13-vii(e)	Legal Authorities Enforcement Staff	Authority to inspect grease producing facilities, enforcement authorities, and whether the City has sufficient staff to inspect and enforce the FOG ordinance
D-13-vii(f)	Problem Areas	An identification of sanitary sewer system sections subject to FOG blockages and establishment of a cleaning maintenance schedule for each section
D-13-vii(g)	Problem Area Source Control	Development and implementation of source control measures for all sources of FOG discharged to the sanitary sewer system for each section identified in (f) above

PUBLIC OUTREACH PROGRAM

The City's FOG Control Program includes a public outreach program, as required by WDR D-13-vii(a) (see above). The outreach program is documented each year in a City document entitled *The Annual Pretreatment Report* (Pretreatment Report). Appendix 8A contains Chapter 13 of the 2008 Pretreatment Report, which serves as example documentation of the outreach program. Documentation of the latest update of the outreach program can be found in the current Pretreatment Report, which is stored in the Utilities Department Library.

FOG DISPOSAL PLAN

The City's FOG Control Program includes a FOG disposal plan, as required by WDR D-13-vii(b) (see above). The City's Easterly WWTP accepts FOG at its septage receiving facility that was constructed in 2005. Easterly WWTP will accept at least 25,000 gpd of waste from septage haulers, which includes FOG¹. This capacity to accept septage/FOG is based on the review of historical septage/FOG delivery records, and is expected to be adequate to accommodate septage/FOG loads from the City's service area for the near future. As the community grows and the treatment plant is expanded to accommodate that growth, the City will periodically assess the ability of the treatment plant to accommodate the anticipated amount of FOG and adjust operational practices or modify facilities when necessary to meet the needs of the service area. Funding for such operational changes or facility modifications will be provided by a combination of operation and maintenance charges and fees paid by the commercial septage/FOG haulers. FOG removed from Vacaville is also accepted by East Bay Municipal Utilities District at its wastewater treatment plant.

LEGAL AUTHORITIES

The City has the legal authorities needed to conduct its FOG Control Program, as required by WDR D-13-vii(c) and (e) (see above). The City Municipal Code establishes the authorities needed for the FOG Control Program, as discussed in Section 4, Legal Authority. Municipal Code can be downloaded at the following internet address:

<http://www.codepublishing.com/ca/vacaville/>

GREASE REMOVAL DEVICES

The City requires installation and proper maintenance of grease removal devices in food service establishments (FSEs), as required by WDR D-13-vii(d) (see above). The California Plumbing Code, which was codified by the City in City Municipal Code section 14.20.252-Construction Code, California Plumbing Code, requires that all new FSEs install grease removal devices—the subject code can be downloaded at the internet address discussed above. The City also can

¹ "Final Predesign Report—Easterly Wastewater Treatment Plant Expansion and Renovation Project", West Yost Associates, March 1999.

require that an existing FSE (without a grease removal device) install one if, through the Utilities Department's Pretreatment Program, the City can prove that the FSE is contributing to a sewer blockage or overflow. The California Plumbing Code (which the City has adopted) specifies the design standards for grease removal devices installed in the City. Maintenance (such as cleaning), record keeping, and reporting requirements for grease removal devices are specified in Municipal Code section 13.08.451—Fats, Oils and Grease Control—see Section 4, Legal Authority. The section also requires that any FSE upstream of a FOG problem area (not just FSEs that can be proven to be causing a FOG problem) in the collection system install a grease removal device. The section (13.08.451—Fats, Oils and Grease Control) is currently draft. An example version of the section is contained in Appendix 4A. The latest version of the draft section (13.08.451—Fats, Oils and Grease Control) can be obtained from the Water Quality Supervisor of the Utilities Department. The section is expected to be adopted by City Council and become available on the City's internet site in the second half of 2009.

BEST MANAGEMENT PRACTICES

The City has BMP requirements for FOG disposal in FSEs, as required by WDR D-13-vii(d) (see above). The BMP requirements are listed in Municipal Code section 13.08.451—Fats, Oils and Grease Control. The section is currently draft. An example version of the section is contained in Appendix 4A. The latest version of the draft section can be obtained from the Water Quality Supervisor of the Utilities Department. The section (13.08.451—Fats, Oils and Grease Control) is expected to be adopted by City Council and become available on the City's internet site in the second half of 2009.

ENFORCEMENT STAFF

The City has sufficient staff to inspect FSEs and to enforce the FOG Control Program, as required by WDR D-13-vii(e) (see above). The Utilities Department employs two Pretreatment Program inspectors that, on a routine basis, inspect FSE grease removal devices and FOG disposal BMP execution. The inspectors inspect approximately one-third of the City's FSEs in a typical year. Ad hoc inspections are also conducted after FOG problems occur. To aid in this type of inspection, field maintenance crews (from the Public Works Department) are readily available to inspect the sewers in which problems occur in order to help determine which FSE(s) is (are) causing the problem. For remodeling and new construction of FSEs, the City has several stages of review and inspection to ensure that grease removal devices are designed and installed properly. Public Works Department engineers review the design, and both Community Development Department building inspectors and Utilities Department water quality inspectors inspect grease removal device installations.

PROBLEM AREAS

The City has a list and mapping of sewers that experience chronic FOG problems, along with an increased-frequency cleaning schedule for those sewers, as required by WDR D-13-vii(f) (see above). The problem area list, mapping, and cleaning schedule are discussed in Section 5, O&M Program.

PROBLEM AREA SOURCE CONTROL

The City has developed and is implementing source control measures for FOG sources (FOG dischargers to the collection system) tributary to the problem areas discussed above, as required by WDR D-13-vii(g) (see above). Source control measures include the City's FOG disposal public outreach program, and requirements for grease removal devices and for FOG disposal BMPs, as discussed above.