



# MANAGER'S REPORT

DATE ISSUED: May 29, 1991 REPORT NO. 91-247

ATTENTION: Public Services and Safety Committee  
Agenda of June 5, 1991

SUBJECT: Garbage Disposal Removal in Food Establishments

REFERENCES: February 2, 1990, Communication from the San Diego  
Restaurant Association  
March 21, 1990, Actions of the Public Services and  
Safety Committee, Item No. 18  
November 21, 1990, Actions of the Public Services  
and Safety Committee, Item No. 12

## SUMMARY

Issue - Should food establishments be required to remove garbage disposals at pre-rinse stations and connect the pre-rinse waste lines to grease traps/interceptors?

Manager's Recommendations - Garbage disposals should be removed and pre-rinse waste lines connected to grease removal equipment; garbage disposals should only be allowed at pre-rinse stations when plumbed to a grease interceptor sized large enough for the excess food matter.

This recommendation does not require an ordinance amendment.

Other Recommendations - None.

Fiscal Impact - By reducing the amount of grease in the sewage collection system, the City will be able to: a) reduce maintenance costs associated with the cleaning and clearing of blocked sewer mains, b) reduce the number of claims against the City resulting from sewer back-ups caused by grease, and c) avoid possible penalties levied by regulatory agencies for sewage spills.

## BACKGROUND

At the March 21, 1990, meeting of the Public Services and Safety Committee, the Manager was requested to respond to a communication from the San Diego Restaurant Association. It had raised a concern regarding the removal of garbage disposals from pre-rinse stations that are adjacent to automatic dishwashers/pot sinks. It requested that the current ordinance be modified to allow garbage disposals to remain on pre-rinse waste lines. City staff and the Restaurant Association had many discussions on the issue but were unable to come to an agreement. It was subsequently scheduled for the November 15, 1990, meeting of the PS&S committee. At that time the Restaurant Association requested a continuance so that it could continue the dialogue with City staff. This report is a result of those additional discussions.

## DISCUSSION

### Food Establishment Wastewater Discharge Permit Program

The Food Establishment Wastewater Discharge (FEWD) Permit Program was implemented in FY90. Working with the Building Inspection Department, the FEWD staff currently reviews plans for all new restaurants. To date, over 300 new restaurants have been processed to ensure that the proper grease removal equipment will be in place when they open for business.

It should also be noted that in the secondary treatment Consent Decree with the Federal Government, the importance of stopping grease from entering the system is referenced. It specifically calls out that all commercial food preparation establishments must be permitted and required to install grease removal equipment by September 30, 1991. This involves an estimated 3,700 restaurants.

To date, the FEWD program has performed 3,563 facility inspections/conferences and issued 1,040 permits. While statistics on reduction of grease related overflows are still preliminary, a downward trend has been noted.

Grease Trap - A device designed to retain grease from one to a maximum of four fixtures. Traps may be located inside the facility and require frequent maintenance. Traps cannot work efficiently if connected to a garbage disposal.

Grease Interceptor - A large exterior unit that must be pumped or cleaned out by a commercial waste hauler.

The Food Establishment Wastewater Discharge Ordinance (Municipal Code Chapter VI, Article 4, Division 7, added 7-11-88) requires the installation of grease traps/interceptors on any waste line leading from the food preparation area or from sinks, drains,

appliances and other fixtures or equipment used in food preparation or cleanup where grease may be introduced into the sewerage system.

Under Municipal Code Section 64.0708, the Food Establishment Wastewater Discharge (FEWD) Permit Program has identified pre-rinse stations as a fixture that discharges grease to the sewer. At these stations, dirty dishes and pots are rinsed before final wash in a pot sink/dishwasher. Many pre-rinse stations are plumbed through a garbage disposal.

Per the Uniform Plumbing Code - 1988 Edition Section 713, no food waste disposal unit shall be connected to or discharged into any grease interceptor or grease trap unless specifically required or permitted by the Administrative Authority (the City of San Diego Building Inspection Department).

It is recommended that we modify our present policy such that garbage disposals be allowed at pre-rinse stations only when plumbed to a grease interceptor sized large enough for the excess food matter. Under our present policy, garbage disposals are not allowed at pre-rinse stations under any circumstances. Because of the associated costs of plumbing modifications, we further recommend that facilities be allowed a 3-year grace period by which to comply with requirements at the dishwasher/pot sink pre-rinse station, except in the following cases:

- 1) The facility undergoes a major kitchen remodel, in which case modifications will be required during the plan check process.
- 2) The facility is located on a sewer line that has experienced two or more grease related blockages in the last twelve months.
- 3) The facility has an existing grease interceptor.
- 4) The existing garbage disposal is inoperable or not being used.

This recommendation would give some relief to larger establishments, while protecting the sewerage system by:

- a) Satisfying the requirement for grease removal equipment per the Food Establishment Wastewater Discharge Ordinance.
- b) Reducing grease and solids load on the sewer system.
- c) Allowing food establishments to weigh the increased cost of installation (\$10,000 - \$20,000) and maintenance of interceptors against the benefit of having a garbage disposal and a reduced amount of wet garbage.

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## SUMMARY

The reduction of the amount of grease entering our sewerage system is vital to reducing the number of sewage spills and complying with the requirements of the Consent Decree. The requirements of the FEWD Permit Program combined with enhanced maintenance efforts is resulting in a reduction in spills caused by grease. It is imperative that all necessary steps be taken to continue this progress. Control of the use of garbage disposals in food establishments is a key factor in this effort.

## ALTERNATIVES

1. Continue the present policy whereby pre-rinse stations must be plumbed through grease traps/interceptors. Garbage disposals are not allowed under any circumstances.

### Analysis:

- a) Complies with Ordinance requirements at the least expense (\$2,000 for a grease trap installation in addition to the loss of investment in the garbage disposal).
  - b) Reduces grease and solids load on the sewer system.
  - c) Prevents food establishments from having garbage disposals at pre-rinse stations.
  - d) Increases the amount of wet garbage in facilities where pots/dishes were previously scraped directly into the disposal.
2. Garbage disposals that are installed at pre-rinse stations are allowed to by-pass grease traps/interceptors.

### Analysis:

- a) Does not satisfy the Ordinance.
- b) Allows grease/solids to be discharged to the sewer system.
- c) Allows food establishments to keep garbage disposals.
- d) Avoids grease trap installation and maintenance costs at the pre-rinse station.

Respectfully submitted,

*H. R. Frauenfelder*

H. R. FRAUENFELDER  
Deputy City Manager

MILLS/ACL

### Attachments

1. Pre-Rinse Station Schematics
2. Communication from San Diego Restaurant Association