



County Sanitation Districts of Los Angeles County

A FACTSHEET FOR:

Considerations in Establishing a Municipal Oil and Grease Program

Scope of Oil and Grease Problems

Oil and grease, primarily generated from restaurants and other institutional food service establishments, are major contributors to sewer line blockages and overflows.

This document provides guidance for those municipalities considering implementing or updating a local oil and grease program.

Required Resources

Establishing a local oil and grease program can be a resource-intensive undertaking. Ideally, one to three full-time staff positions are required to operate a program depending on the number of dischargers. These resource requirements must be carefully considered when establishing a new program, and city council and public works directors should be made aware of the required resource commitment early in the planning stages. Furthermore, it is important to consider that establishing a program takes time. Do not be overly ambitious when starting out, and consider focusing on small traditional problem areas first.

Legal Authority

Generally, municipalities have taken one of three routes for establishing legal authority over institutional food service discharges: (1) modifying their Sewer Use Ordinance (SUO) to specifically address oil and grease sources, (2) writing a stand-alone SUO, or (3) directly permitting the sources. Municipalities should balance their available resources with the effectiveness of the current enforcement tools. If municipalities believe the existing SUO will be effective then this maybe the least resource intensive means to provide the legal authority for a program. Conversely, local permits to the individual dischargers send a clear message of the

municipalities' commitment to addressing discharges and may serve as a more effective enforcement tool. However, they require the most time and resources to write and implement.

Despite additional resource requirements to write stand-alone SUOs and issue local permits, this route may be the most effective if the discharging audience resists the existing SUO requirements.

When local oil and grease limits are adopted, limits generally vary from 100 mg/L to 500 mg/L. However, the adoption of a specific numerical limitation may present a problem if other constituents are in the wastewater that are inadvertently recorded as oil and grease in the testing process. Municipalities should attempt to evaluate a limit specific to their sewer system through research and sampling, if such a limit is to be pursued.

Educational Efforts

Institutional food service establishments differ from industrial dischargers in that their time and available resources for activities other than food preparation is very limited, personnel turn over is higher, and they are often unaware of the environmental aspects of their operations. As a result, most municipalities encourage educating their dischargers prior to pursuing enforcement. In many cases, taking time to explain the community's concerns and the problems caused by blockages help to develop a productive working relationship between the source and the municipality, and may also encourage establishments to be more proactive about solutions. A working relationship saves time and headaches consistent with a more confrontational approach. The payback is greater if there

is a cooperative effort between the two parties.

Educational efforts include meeting one-on-one with the sources, writing guidance manuals, and holding workshops. As a new restaurant arrives, it may be a good time to introduce yourself to the new manager and educate them on the problems and the importance of keeping oil and grease from the sewer.

Sizing Requirements and Grandfathering

Most public works agencies have a minimum requirement for the sizing of a grease trap/interceptor. Some agencies require that the trap be sized based on a detention time. Most municipalities have a grandfathering policy that makes allowances for space restrictions in older restaurants. Examples of these policies include allowing the installation of an indoor trap in lieu of an outside interceptor.

Identifying New Sources/ Coordination with City Departments

It is important to identify new sources early in the planning stages so all local concerns and requirements can be addressed as soon as possible. Requiring a restaurant owner to dig up a parking lot and install an interceptor is best avoided for obvious reasons. A new construction notification system with city planning or plumbing departments is frequently used, as these groups routinely review proposed plans for new sources. Some cities report difficulties implementing this new procedure, but additional efforts in pursuing and establishing this relationship will prevent future problems.

Inspection and Sampling

Inspection Frequency

When establishing inspection and sampling frequencies, it is important to compare the size of the regulated community against the available personnel and laboratory resources. Some municipalities with established SUOs inspect their oil and grease sources regularly. However not all conduct sampling. A means of augmenting inspections and sampling is to have restaurants submit hauling vendor paperwork on a regular frequency to ensure pumping was conducted. If no paperwork is received, staff conducts an inspection and pursues enforcement as necessary. Restaurants and food service concerns that only rely on under the sink grease traps may need to be inspected frequently due to the high

maintenance requirements of such systems. Additional inspections should be scheduled of all restaurants in an area where a blockage occurs. During inspections, most agencies evaluate the sink and trap setup, quantity of grease in the trap, clarity of the effluent, grease recycling bin, and hauling records.

Cleaning Schedule

Cleaning requirements often differ between municipalities. Some municipalities specify a cleaning frequency, while others base the cleaning frequency on the type of establishment and the amount of grease generated. Other municipalities leave it up to the source to determine the cleaning frequency they needed to meet the local or SUO limit.

Sampling Point

Careful consideration should be given to the most representative sampling point where samples are to be taken. Opinions on the best sampling point vary. Many agencies that sample do so from a cleanout immediately downstream of a trap or from an effluent tee to get an indication of the discharge flowing from the interceptor. Others sample at a downstream manhole to obtain a combined sample.

Enforcement

Enforcement varies widely among municipalities. Because of the recent implementation of many of the programs, most municipalities have yet to issue any type of monetary penalties. Some municipalities issue Notices of Non-Compliance. Most municipalities either presently or plan to pass the cost of clearing blockages and cleanup and any regulatory fines assessed back to the offending party.

Benefits to Date

Impressive benefits have been reported by municipalities who have closely tracked results justify the time and resource requirements of establishing an effective oil and grease program. One municipality reports sewer line maintenance costs fell by 97% from more than \$30,000 to less than \$2,000 in less than two years. Another estimated savings of \$45,000 in sewer maintenance costs per year. Many programs with recently implemented programs are still collecting data to quantify the financial benefits, but all report reduced sewer line overflows.