# City of Jackson

## Fats, Oils, and Grease (FOG) Control Program

Version 2.0

April 2021

## Prepared for:

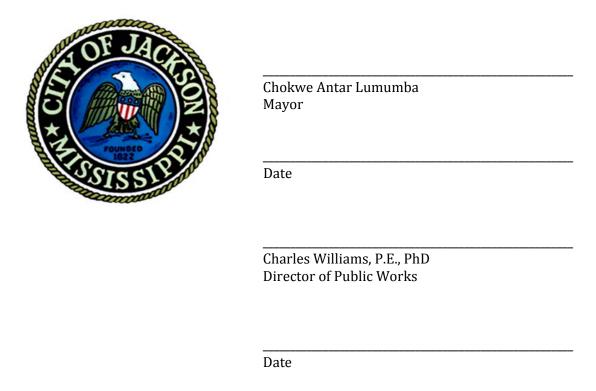
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# City of Jackson, Mississippi Fats, Oils, and Grease Control Program

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering such information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.



# Summary of Revisions to FOG Control Program CMOM Report Version 2.0

| Date of   |                    | Section(s) |   |
|-----------|--------------------|------------|---|
| Revision  | Author(s)          | Revised    | Description of Revisions  |
| 1/28/2021 | COJ<br>WEI/AJA LLC | 1.0        | Modified purpose of report, which is to document what activites have been accomplished by the City of Jackson to implement FOG Control Program.   |
| 1/28/2021 | COJ<br>WEI/AJA LLC | 2.0        | Provided description of legal authority for implementing FOG Control Program by new ordinance adopted 2/27/2015 and amendment adopted 4/14/2020.  |
| 1/28/2021 | COJ<br>WEI/AJA LLC | 3.0        | Updated FOG Characterization Study to reflect current conditions as of December 2020.   |
| 1/28/2021 | COJ<br>WEI/AJA LLC | 4.0        | Described permitting and inspection process developed by City of Jackson for installation of new FOG control equipment, design and construction standards for FOG control devices, and required management, operation, and maintenance standards.                                     |
| 1/28/2021 | COJ<br>WEI/AJA LLC | 5.0        | Described administrative provisions of the FOG Control Program and enforcement mechanisms allowed under the Sewer Use Ordinance.  Described assistance available to FSEs in complying with program requirements.  |
| 1/28/2021 | COJ<br>WEI/AJA LLC | 6.0        | Described Jackson public education and outreach program designed to inform residents about proper handling and disposal procedures for FOG and the instructional video and educational materials developed by the City.   |
| 1/28/2021 | COJ<br>WEI/AJA LLC | 7.0        | Described resources the City of Jackson is providing to implement the FOG Control Program, the City's FOG Program Information Management System, and performance measures used for FOG control. Provided a timeline to show the progression of FOG Program implementation activities. |
| 1/28/2021 | COJ<br>WEI/AJA LLC | Appendices | Updated to include new sewer use ordinance, current FOG Control Program fact sheets, inspection forms and records, grease control device standards, legal enforcement notices, and examples of public education materials developed by the City.                                      |

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## 1.0 Introduction

The City of Jackson entered into a Consent Decree with U.S. EPA on March 1, 2013 to address inadequacies of the City's wastewater collection and transportation system (WCTS). The Consent Decree included a requirement to prepare and submit a *Fats, Oils, and Grease Control Program* (FOG Program) report describing the necessary actions the City will take to fulfill the requirements set forth in Consent Decree § VI (D) 39. The FOG Control Program CMOM report was prepared and timely submitted to EPA on February 28, 2015. The report was subsequently approved by EPA on August 9, 2016. Upon approval, the City began implementing the FOG Control Program.

This update to the FOG Control Program CMOM report was prepared to describe and document the FOG control implementation activities that have been completed by the City of Jackson. As described in this report, the City has successfully implemented all of the CMOM FOG requirements and the current program is fully compliant with the Consent Decree requirements.

## 1.1 Report Organization

Section 1 provides an overview of the FOG Program requirements enumerated in the Consent Decree and definitions of FOG elements as they are interpreted for this Program. The current legal authority for fats, oils, and grease control provided in the City's sewer use ordinance is described in Section 2. Results of a FOG characterization study in Jackson are provided in Section 3. The standards established by the City for FOG control devices are described in Section 4 together with the required FOG management, operations, and maintenance procedures. Section 5 describes the FOG Program compliance protocols and enforcement mechanisms used in achieving compliance. For effective FOG control, proper public education is required to prevent discharges of FOG into the sewer system; the public education program is described in Section 6. The *City of Jackson FOG Control Program* resource requirements, information management system, performance indicators, and implementation timeline are provided in Section 7.

### 1.2 Consent Decree Requirements

As stated in the Consent Decree, the FOG Control Program shall contain the following:

Within twenty-four (24) months after the Date on Entry of the Consent Decree, the City shall submit to EPA for review and approval a FOG Control Program, including a schedule for full implementation of the Program not to exceed twelve (12) months after its approval by EPA. The FOG Control Program shall include, at a minimum, the following:

- 1. The legal authority to control the discharge of FOG into the WCTS, including the ability to implement a permit and enforcement program.
- 2. Specification of accepted devices to control the discharge of FOG into the WCTS.

- 3. Establishment of standards for the design and construction of FOG control devices including standards for capacity and accessibility, site map, design documents, and as-built drawings.
- 4. Establishment of FOG control device management, operations, and maintenance standards, or best management practices, that address onsite record keeping requirements, cleaning frequency, cleaning standards, use of additives, and ultimate disposal.
- 5. Establishment of construction inspection protocols, including scheduling, inspection report forms, and inspection record keeping requirements, to assure that FOG control devices are constructed in accordance with established design and construction standards.
- 6. Establishment of compliance inspection protocols, including scheduling, inspection report forms, and inspection record keeping requirements to assure that FOG control devices are being managed, operated, and maintained in accordance with the established management, operations, and maintenance standards or best management practices.
- 7. Establishment of a FOG disposal manifest system.
- 8. Establishment of an enforcement program, including specific enforcement mechanisms, to ensure compliance with the FOG Control Program.
- 9. Establishment of a compliance assistance program to facilitate training of FOG generators and their employees.
- 10. Establishment of a public education program directed at reducing the amount of FOG entering the WCTS from private residences.
- 11. Establishment of staffing (technical and legal) and equipment requirements to ensure effective implementation of the FOG Control Program.
- 12. A FOG characterization study that shall identify the sources of FOG causing problems in the WCTS and the best method or mechanism for addressing those sources.
- 13. A list of current commercial establishment FOG generators including a description of their FOG generating processes and average daily discharge volume.
- 14. Establishment of performance indicators to be used by the City to measure the effectiveness of the FOG Control Program.

## 1.3 Program Overview

The FOG Control Program includes two important components:

#### 1. Commercial Food Service Establishments

As part of the FOG Control Program, food service establishments (FSEs) are required to capture and dispose of grease generated by their operation. The FOG Control Program requires FSEs to install approved, adequately sized, properly installed and maintained grease control equipment. Through this effort, the goal of improved sewer service through proper grease control can be achieved.

#### 2. Public Awareness Program

A Public Awareness Program designed to communicate the harm caused by unnecessary grease disposal into sinks and drains has been developed. The Program is helping to raise awareness of the need for good household practices to properly collect and dispose of used fats, oil and grease.

#### 1.4 Definitions

Unless otherwise expressly stated in the City of Jackson Sewer Use Ordinance, or if the context in this Program report clearly indicates a different intention, the following terms have the meanings indicated below.

#### **Black Water**

Wastewater from sanitary fixtures such as toilets and urinals.

#### **Food Service Establishment**

Any establishment, business, or facility engaged in preparing, serving, or making food available for consumption.

#### **Garbage Grinder**

A device which shreds or grinds up solid or semisolid waste materials into smaller portions for discharge into the sanitary sewer collection system.

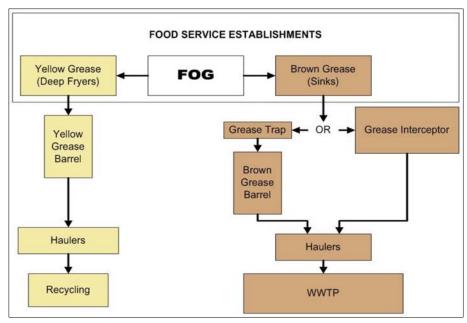
#### **Grav Water**

Refers to all wastewater other than "Black Water" as defined in this section.

#### Grease

A material composed primarily of fats, oil, and grease from animal or vegetable sources. The terms fats, oil, and grease may be referred to as grease or types of grease in this document and does not include petroleum-based products.

- Brown grease Fats, oils, and grease that is discharged to the grease control equipment.
- Yellow grease Fats, oils, and grease, usually spent oil from deep frying, that has not been in contact with or contaminated from other sources (water, wastewater, solid waste, etc.) and can be recycled. Yellow grease is typically stored in a rendering container outside the FSE.



**Proper Waste Grease Management** 

#### **Grease Control Device (GCD)**

A device for separating and retaining grease and solids prior to wastewater exiting the FSE and entering the sanitary sewer collection system. The GCD is so constructed as to separate and trap or hold grease from entering the sanitary sewer collection system. Devices include hydromechanical grease interceptors and gravity grease interceptors.

#### **Gravity Grease Interceptor**

Grease control equipment identified as a large tank or device so constructed as to separate and trap or hold fats, oil, and grease substances from the sewage discharged from a facility in order to keep fats, oil, and grease substances from entering the sanitary sewer collection system. Grease Interceptors are typically located outside of FSEs due to their size.

#### **Hydromechanical Grease Interceptor**

Grease control equipment designed to separate, trap or hold fats, oils and grease substances to prevent their entry into the sanitary sewer collection system. Hydromechanical grease interceptors are usually installed inside and under or in close proximity to sinks or other fixtures likely to discharge grease. All hydromechanical grease interceptors must be installed with a flow restrictor and vent. Gravity grease interceptors are larger tanks generally installed outside of the facility. Hydromechanical grease interceptors in lieu of gravity grease interceptors are only allowed under specific conditions including, but not limited to, if no cooking is occurring at the facility.

#### **Waste Hauler**

One who transfers waste from the site of a customer to an approved site for disposal or treatment. The waste hauler is responsible for assuring that all federal, state and local regulations are followed regarding waste transport.

## 2.0 Legal Authority

This section describes the legal authority of the City of Jackson related to control of FOG discharges. The City's Sewage Disposal Standards ordinance was amended on February 27, 2018 to include new provisions for FOG control in the sanitary sewer system. The new provisions contained in the amended ordinance include:

- Establishment of the Fats, Oils, and Grease Control Program;
- Expanded list of definitions to include FOG terminology and FOG control devices;
- Grease control device requirements and sizing standards;
- Onsite management, record keeping, and maintenance requirements;
- Fees to recover inspection and compliance program costs;
- Graduated enforcement responses;
- Appeal and waiver provisions;
- Suspension of service;
- Civil penalties

At the request of EPA, the ordinance was amended on April 14, 2020 to remove a grandfather clause that allowed existing Food Service Establishments to be exempted from the requirement to install a grease control device, if they were not causing a FOG problem in the sewer system.

The current amended sewer use ordinance as of April 1, 2021 containing the FOG provisions is included in Appendix A.

## 3.0 FOG Characterization Study

The occurrence of FOG-caused problems in the Jackson wastewater collection system was assessed during development of the original CMOM report to characterize the nature and extent of FOG in contributing to sanitary sewer overflows (SSOs). The major FOG contributors in the City were also identified. This inventory served as a basis for implementing required control measures to mitigate sewer blockages caused by FOG.

#### 3.1 Jackson FOG Issues

Like most cities, Jackson must expend significant resources within the Sewer Maintenance Division for controlling FOG problems. A *Sewer Overflow Response Plan* was prepared by the City and approved by EPA on October 20, 2011. The original SORP was subsequently updated and reissued in February 2021. The SORP includes a proactive procedure to identify potential and actual sewer overflows and to determine the primary cause of each overflow. The number, estimated quantity of overflow discharged, and primary cause of SSOs are tracked and reported quarterly.

FOG is the leading cause of sewer blockages and is the primary cause of dry weather sewer overflows. Based on SORP analysis results, the extent of FOG-caused SSOs is illustrated on **Figure 2-1**.

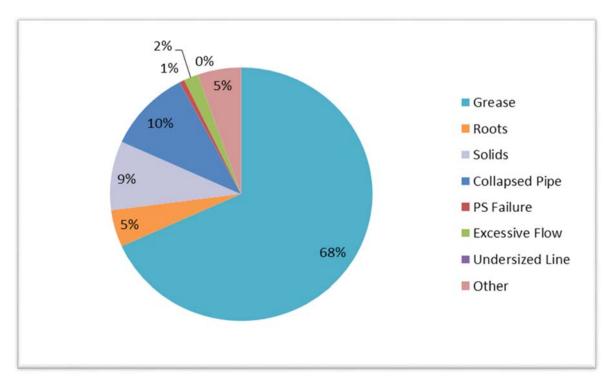


Figure 2-1
Annual Percentage of Collection System SSOs by Cause

#### 3.2 FOG Sources

In order to make the FOG Control Program effective, sources of FOG must be addressed to the extent practicable. Industrial customers that generate FOG are regulated under the pretreatment program administered by MDEQ. This regulation is generally effective, and the industrial customers do not typically cause recurring problems of illicit FOG discharges and resulting SSOs. In Jackson, the primary sources of FOG are food service establishments (FSEs) and private residences.

#### **Areas with Recurring FOG Cleaning Needs**

Like all cities, there are a number of locations in the Jackson sewer system where recurring cleaning is needed to avoid excessive grease buildup and to reduce the potential for SSOs at these locations. When the FOG Control Program was developed in 2015, there were nine locations where recurring cleaning operations were being performed as listed below.

- Glenwood Drive Behind Buford Yerger Retirement Center
- 4800 I-55 North East frontage road adjacent to Piccadilly Cafeteria
- 1501 Jacksonian Plaza Manhole between Piccadilly and Post Office
- 4910 I-55 North Adjacent to Kroger Grocery Store
- State Street at Meadowbrook Adjacent to KFC Restaurant
- McDowell Road at I-55 Adjacent to Waffle House Restaurant
- 4884 Hwy. 18 Adjacent to Chans Garden Chinese Restaurant
- Briarwood at I-55 Adjacent to IHOP Restaurant
- 4515 I-55 North Adjacent to Waffle House Restaurant

Grease buildup at these locations was caused by food service establishments; the retirement center also contributed excessive flushable wipes and other materials that, together with FOG, caused recurring problems. Preventative cleaning for these facilities was performed weekly, in some cases. Currently, as of April 2021, these areas no longer receive cleaning on a regular schedule. This is in part due to the success of the FOG Program FSE inspections that have markedly reduced FOG discharges from FSEs in the vicinity of these locations.

Hydraulic jet/vacuum trucks are used to perform sewer cleaning. The jets utilize high pressure water to scour the walls of sewer pipes. Debris and grease deposits removed by jet washing are vacuumed from the downstream manhole and disposed at the WWTP. Mechanical cleaning methods may also be employed when roots or other blockages are encountered that cannot be removed using hydraulic methods. The sewer maintenance activities are logged on a form and records are kept of the cleaning history of the sewer.

FSEs contributing to the problematic sewers are known to be a major cause of the continuous grease accumulation observed in these particular areas. In some locations, however, private residences including apartment buildings appear to be the principal contributors.

#### **FSE Inventory**

As part of this FOG Characterization Study, an inventory of FSEs within the City of Jackson sewer service area was compiled. There are currently 781 FSEs in Jackson licensed by the Mississippi Department of Health. The current listing is shown on **Table 3-1**.

Table 3-1
Current Jackson Licensed FSEs
April 1, 2021

| FSE Type                  | No.<br>Licensed |
|---------------------------|-----------------|
| Fast Food/Delicatessen    | 360             |
| Full Service Restaurant   | 131             |
| Educational Institution   | 63              |
| Bakery/Donuts/Coffee Shop | 49              |
| Food Trucks               | 39              |
| Hospital/Nursing Home     | 23              |
| Caterer                   | 28              |
| Full Service Bar          | 23              |
| Food Warehouse            | 11              |
| Food Processor            | 7               |
| Shaved Ice                | 6               |
| Feeding Centers           | 6               |
| Seafood Market            | 3               |
| Correctional Facility     | 1               |
| Total                     | 750             |

The City of Jackson FOG Control Program includes the licensed FSEs plus a number of non-licensed facilities that serve food to the public. These include publicly-owned facilities which are not required to be licensed (such as cafeterias in public buildings), churches, day care centers, community centers, athletic stadiums, and several miscellaneous food servers. The current total number of FOG generators on the Jackson FOG inspection schedule includes 1085 FSEs as of April 1, 2021. This list is updated continually as facilities close and new facilities open.

#### **Private Residences**

Recurring FOG problems also occur in sewers within residential areas and apartment complexes where no FSEs are in close proximity. These sewer blockages appear to be the result of improper housekeeping practices in waste grease handling. The public education program is designed to inform residents about proper waste grease handling procedures and the harm caused by improper disposal of waste grease in sinks and drains. Continued public outreach should be beneficial in reducing FOG buildup and SSOs in residential areas.

#### **Other FOG Contributors**

The only other type of commercial establishment in Jackson that generates wastewater with significant FOG are auto servicing establishments, including car washes. Wash water from auto servicing facilities contains grease, oil, and other substances such as engine cleaner

chemicals, sludge, heavy metals, salt and sand mixed with soaps, waxes, and detergents. These facilities require sand and oil interceptors which are similar in construction and purpose to grease removal devices used in FSEs. In these devices, oil and dirt are removed from rinse wastewater before the remaining wastewater is released into the sanitary sewer system. There are currently 26 auto servicing facilities in Jackson as of April 1, 2021. Most, excluding older facilities, have sand and oil interceptors installed and regularly maintained. All auto servicing facilities without sand and oil interceptors are required to install them.

## 4.0 Standards for FOG Control

This section describes the permitting and inspection process required for installation of new FOG control equipment in new or remodeled FSEs. The general design and construction standards for FOG control devices for commercial establishments with FOG discharges are also described together with the required management, operation, and maintenance standards for FOG control equipment.

#### 4.1 General Criteria

The City of Jackson FOG Control Program requires compliance with the general criteria listed below.

- 1. <u>Food Service Establishment (FSE) Employee Training</u>. FSEs are required to train their employees on proper grease disposal practices and the requirements of the FOG Control Program.
- 2. Installation Requirements for New or Remodeled FSEs. All proposed or newly remodeled FSEs inside the City of Jackson wastewater service area are required to install or upgrade to approved, adequately sized, properly installed and maintained grease control equipment. Remodeling of an FSE may include, but is not limited to, the addition of new plumbing fixtures or kitchen equipment. A site map, design drawings, and as-built drawings must be prepared by the FSE and furnished to the City for review and approval. Construction inspection of the device installation is performed by the City building inspector and one of the designated City FOG compliance inspectors.
- 3. <u>Inspections and Compliance for Existing FSEs</u>. All existing FSEs inside the City of Jackson wastewater service area are required to conduct their operations in such a manner that grease is captured on the user's premises and then properly disposed.
  - Each FSE is inspected on an as-needed basis by designated City FOG compliance inspectors to ensure each facility is complying with the FOG Control Program requirements, but at least once per year, at a minimum. Maintenance records are reviewed and the required posting of "No Grease" signs at each fixture that drains to the grease control equipment are checked by the FOG compliance inspectors.

In addition, through preventive maintenance records or emergency calls related to grease, the City identifies and targets grease problem areas in the wastewater collection system. FSEs located upstream of these problem areas and that discharge their wastewater into the problem lines are likely contributors to the grease build-up. Each FSE in the vicinity of the problem area is inspected. The FSE maintenance records, grease control practices, and adequacy of their grease control equipment are assessed. This practice has proven beneficial in reducing sewer blockages caused by grease.

It is prohibited for facilities to have grease control equipment that malfunctions due to structural failure. A collapsed or deteriorated baffle wall, leaks, improperly located or missing tees, and other deficiencies will prevent the grease control equipment from working properly. These deficiencies are required to be addressed through repair of existing equipment or installation of a larger device. The FOG Program requires FSE inspections at least once per year to verify that the grease interceptor is working properly.

Following each inspection, the City inspector provides the FSE with a copy of the inspection report and other Program materials, as necessary. The inspections will typically result in one of the following actions:

- (1) Facilities equipped with adequately-sized and properly maintained grease control equipment and who are in compliance with the FOG Control Program by implementing grease control practices, are provided a copy of the inspection form indicating compliance.
- (2) Noncompliant facilities may be required to achieve compliance through improved housekeeping, increased maintenance and pumping on the existing grease control equipment, and/or installation of a proper grease control device, if one is not present. Follow-up inspections are performed for all noncompliant facilities to insure the required corrective action is implemented.
- 4. <u>Enforcement</u>. The City FOG compliance inspectors evaluate compliance with the FOG Control Program during site inspections. Failure to comply with FOG Control Program requirements increases the risk of producing grease related SSOs in the collection system, which must be prevented. Enforcement actions are taken as necessary in accordance with the enforcement provisions in the Sewer Use Ordinance for the FOG Control Program.
- 5. <u>Upgrades or Changes to Existing FSEs</u>. Any changes or upgrades to an existing FSE (including the addition of new plumbing fixtures or kitchen equipment) which, directly or indirectly, affects grease discharge to the City of Jackson sanitary sewer system must be reported to the City to determine if the existing grease control equipment is adequate, and a building permit is required to implement the modifications.
- 6. <u>Prohibited Discharges to Grease Control Equipment</u>. Black water is not allowed to be discharged to the grease control equipment. Additives and/or chemicals designed to absorb, purge, consume, treat, or otherwise eliminate fats, oils, and grease are prohibited. Yellow grease is also prohibited from being discharged to a grease interceptor.
- 7. <u>Floor Drains</u>. Only floor drains which discharge grease are allowed to be connected to a grease interceptor.
- 8. <u>Garbage Grinders and Dishwashers</u>. Solid food waste products should be disposed of through normal solid waste/garbage disposal procedures. The use of garbage grinders, which discharge to the sanitary sewer, is discouraged. However, in the event that the device is used in a commercial or industrial facility, it is required to have a large particle

trap and be connected to a gravity grease interceptor. The use of a garbage grinder decreases the operational capacity of the grease interceptor and requires an increased pumping frequency to ensure continuous and effective operation.

Commercial dishwashers must be connected to a gravity grease interceptor and are prohibited from being connected to a hydromechanical grease interceptor. Dishwashers discharge hot water and soap, which can melt grease stored within grease control equipment. Melted grease may then pass through the grease control equipment into the customer's private service lateral and ultimately to the City's sanitary sewer collection system.

## 4.2 FOG Control Program Manual

To aid existing FSEs, new FSEs, and the general public in the requirements of the Jackson FOG Control Program, a *FOG Control Program Manual* was developed that contains all of the Program compliance requirements and educational materials. The Manual is available for download on the City of Jackson website. This Manual contains:

- 1. Fats, oils and grease control requirements for Food Service Establishments.
- 2. Food Service Establishment record keeping requirements.
- 3. Food Service Establishment Best Management Practices.
- 4. FOG Control public education materials.
- 5. Sand/Oil Interceptor requirements for automotive and industrial facilities.
- 6. FOG Control Program Sewer Use Ordinance.
- 7. Enforcement Response Guide.

A copy of the current FOG Control Program Manual as of April 1, 2021 is provided in Appendix A.

## 4.3 FOG Permitting Program

All applicants for building permits submitted to the City to construct a new FSE, remodel an existing FSE, or FSE change of ownership must also submit a FOG discharge permit application. This application is also required for automotive facilities. A FOG permit application fee, currently set at \$200 as of April 1, 2021, must also be remitted to cover the City's costs for permit review and construction inspection. A copy of the permit application form is included in the FOG Control Program Manual.

The following must be provided with the building permit application:

- Grease interceptor sizing calculations as required by the International Plumbing Code (IPC) 2006.
- Site plan to scale showing grease interceptor location in relation to building and streets.

- Completed plumbing plan showing food preparation area and all plumbing, kitchen fixtures, and grease interceptors.
- Completed plumbing permit application and fee.
- FOG permit application fee of \$200 must be remitted to cover the City's costs for permit review and construction inspection.
- Manufacturer's drawing, specifications and performance information on grease interceptor device.

Grease control equipment shall be installed and connected so that it is easily accessible for inspection, cleaning, and removal of the intercepted grease at any time; and be located in an area that is a sufficient distance from any air intake. The best location for a Gravity Grease Interceptor (GGI) is in an area outside of an exterior wall, but upstream from the black water drain line(s). The best location for a Hydromechanical Grease Interceptor (HGI) is inside the FSE in an area that can be easily accessed for maintenance.

All potential FOG-containing wastewater streams shall be plumbed to a grease interceptor. Black water and wastewater sources not containing grease may not be connected to the grease interceptor. No discharges from food waste grinders or dishwashers may be connected to HGIs (these units require GGIs).

#### 4.4 FOG Control Device Standards

The City of Jackson has adopted the International Plumbing Code which includes standards for FOG control devices. The standards are reflected in the FOG control device standards included in Section 1 of the FOG Program Manual. The City's interpretation of the IPC pertaining to furnishing, installing, and operating FOG interceptors is described below.

#### **Grease Interceptors**

A grease interceptor is a specialized device installed in the sanitary drainage system of an FSE to retain nonpetroleum fats, oils, and grease contained in wastewater discharged to the system from cooking and cleaning operations. Grease interceptors must receive wastewater from all contributory sources, such as pot sinks, dishwashers, floor drains, and mat washing area drains before draining to the sanitary sewer system. For grease interceptors to function properly they must be properly sized and regularly serviced and maintained by qualified personnel. There are two major types of grease interceptors plus two less common types that may be required in special applications:

**Hydromechanical Grease Interceptor**. A hydromechanical grease interceptor, commonly referred to as a grease trap, is a small grease removal device installed indoors, typically under sinks. In addition to gravity, HGIs use air entrainment, flow restriction, removable screens, and interior baffles to influence flow characteristics resulting in FOG separation in a smaller tank size.

Flow Inlet

Sollids Basket with Filter Screen captures food particles

Flow hits Integral Ramp directing grease and entrained air upwards, assisting the grease and water separation

Surface load capacity = 200kg

Water and fine food particles

Outlet Baffle prevents grease from entering the waste system

Figure 4-1
Typical Hydromechanical Grease Interceptor

Courtesy Marley Pipe Systems

**Gravity Grease Interceptor**. Gravity grease interceptor is the term used for larger tanks that are typically installed outdoors. A GGI consists of a tank with at least two compartments, at least 500 gallons capacity, and interior baffles for flow control. FOG is removed by gravity separation.

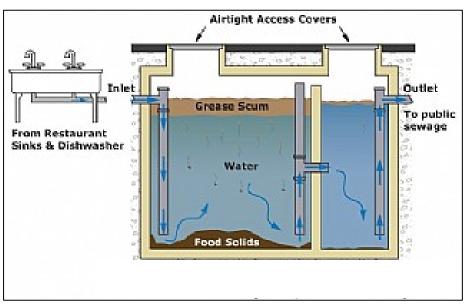


Figure 4-2
Typical Gravity Grease Interceptor

**Courtesy Advance Concrete Products** 

Other Grease Interceptor Types. These include Grease Removal Devices (GRDs) and FOG Disposal Systems (FDSs). GRDs employ heat and a mechanical grease separator (rotating drum or belt, typically) to physically remove the grease from the unit and divert it to a separate storage vessel. FDSs are on-site treatment units that reduce FOG by biological decomposition; specialized bacteria are metered into the flow and membrane filters are used to separate biological solids from the wastewater. Both of these systems are more expensive and require more maintenance than conventional HGIs; however, they may be required by the City in certain special circumstances (e.g., recurring grease discharge violations, insufficient space to install a GGI).

#### **FOG Control Device Requirements**

Most FSEs will require a gravity grease interceptor. Hydromechanical grease interceptors can be used at FSEs if there is no cooking or frying. The appropriate type of grease control equipment will be determined by the FSE based on FSE type and the plumbing fixtures, and must be approved by the City. Sizing and design of the grease interceptor must be performed by a licensed plumber or professional engineer and approved by the City.

#### **Grease Interceptor Sizing**

Grease interceptors are sized for the peak wastewater flow from all contributory sources. Gravity grease interceptors are sized on the basis of a 30 minute detention time to allow FOG separation from the waste stream by gravity and accumulation in the tank for subsequent removal. The size of a hydromechanical grease interceptor is expressed in gallons per minute (gpm) based on the flow that the unit can accept and still remove 90% or more of FOG in the waste stream. HGI sizes are rated by the manufacturer.

All grease interceptors must be sized properly. Cleaning of interceptors is required on a regular schedule to avoid overload and passing of FOG to downstream sewers, and to prevent hydrogen sulfide generation that would lead to corrosion of the tank and downstream sewers, and to control odors.

Sizing of grease interceptors must conform to the requirements of the International Plumbing Code 2009 Section 1003.3 as adopted by the City of Jackson.

Similarly, the IPC 2009 Section 1003.4 contains design standards for oil separators for car washes and auto repair shops.

#### **Construction Inspection**

An inspection of new or modified grease control equipment is required. These inspections are performed by the City of Jackson plumbing inspector and a designated FOG Program compliance inspector. Inspectors will check for proper installation, in accordance with manufacturer instructions; and proper pipe and fitting connections, in accordance with the IPC. Passing of the inspection is required prior to placing the equipment in service.

## 4.5 Management, Operation and Maintenance Standards

Grease control device management, operation, and maintenance standards required by the City of Jackson are summarized below. The maintenance requirements are included on Fact Sheets developed to educate owners and managers of FOG control devices on the proper maintenance of this type of equipment. These fact sheets are included in Section 1 of the FOG Control Program Manual, included as Appendix A.

<u>Cleaning/Pumping</u>. The user, at the user's expense, shall properly maintain all grease control equipment.

Maintenance of hydromechanical grease interceptors includes the removal of all fats, oil, and grease from the detention compartment of the tank. Removal is usually accomplished by hand-dipping or scooping the collected grease, solids, and wastewater from the tank and properly disposed of. Maintenance may also be performed by a waste hauler.

Maintenance of gravity grease interceptors must be performed by a waste hauler and includes the complete removal of all contents, including floating materials, wastewater, bottom sludges and solids, as well as grease that has accumulated on the side walls. Dewatering or discharging removed waste back into the grease interceptor from which the waste was removed or into any other grease interceptor or downstream manhole on the sewer collection system, for the purpose of reducing the volume to be disposed of, is prohibited.

<u>Cleaning/Pumping Frequency</u>. Hydromechanical grease interceptors must be cleaned no less than monthly or as often as necessary to prevent grease from entering the City's sanitary sewer collection system. Failure to perform cleaning and maintenance of an HGI as required, may result in an order from the City to execute a contract with a waste hauler to perform the cleaning per the required schedule, or result in a requirement for the FSE to install a larger capacity grease control device that could include a gravity grease interceptor.

Gravity grease interceptors must be pumped out completely a minimum of once every three months, or more frequently, as needed, to prevent grease from entering the sanitary sewer collection system. Measurement of solids greater than or equal to 25% shall be considered noncompliant with the City's FOG Control Program. This compliance monitoring and evaluation may be conducted by a sludge judge tool or electronic measuring device.

<u>Disposal of Grease Waste</u>. Waste removed from grease interceptors must be disposed of with other solid waste or garbage in a sealed container to prevent leakage unless cleaned and disposed of by a waste hauler. All waste removed from grease interceptors must be disposed of at a facility approved by the City to receive such waste in accordance with the provisions of this Program. In no way shall the pumpage be returned to any private or public portion of the sanitary sewer collection system.

<u>Additives</u>. Any additive(s) placed into the grease interceptor or building discharge line system on a constant, regular, or scheduled basis is prohibited. Such additives include, but are not limited to, chemicals, drain cleaners, acids, caustics, enzymes, commercially available

bacteria, emulsifiers, surfactants, or other products designed to absorb, purge, consume, treat, or otherwise eliminate fats, oils, and grease. Written approval may be given by the City under specific circumstances; however, approved use may be discontinued at any time if grease is found downstream of the FSE. In addition, approved use will in no way be considered as a substitution to the required maintenance procedures and schedule.

<u>Manifests</u>. All pumpage from grease interceptors must be tracked by a manifest, which confirms pumping, hauling, and disposal of waste. The customer must obtain a manifest from the waste hauler with signatures and keep copies for their records. Waste disposal manifest records will be reviewed during routine inspections by the City.

Maintenance Log. A Grease Control Equipment Cleaning Record Maintenance Log and pumping manifest indicating each cleaning or pumping for the previous 24 months shall be maintained by each facility required to install grease control equipment. This log shall include the date and time of the cleaning, and the company or person conducting the cleaning. For gravity grease interceptors, the log should also include the volume pumped and disposal site used. Maintenance logs shall be kept in an accessible location for inspection and be made immediately available to a City representative upon request.

<u>Grease Control Equipment Certification Program.</u> All FSEs with grease control equipment must have their grease interceptor inspected every year to verify that all components of the interceptors are installed and working properly. Results of the equipment inspection shall be documented to certify that there are no missing inlet or outlet tees, holes or cracks, deterioration of the equipment, overflowing grease at the outlet tee, or any other obvious problems with the interceptor and there is access to all interceptor chambers. A detailed corrective action response is required from the FSE owner or authorized representative, if deficiencies are discovered and the grease control equipment fails the certification.

Corrective actions will be reviewed by the City and an appropriate course of action will be agreed to between the City and the FSE. Failure to appropriately address the deficiencies noted in the failed certification will result in enforcement action as outlined in the City's Sewer Use Ordinance. Immediate corrective action may be necessary if grease is found to be entering the City's sanitary sewer collection system.

## 5.0 FOG Control Program Compliance

This section includes the administrative provisions of the FOG Control Program and enforcement mechanisms that apply as allowed under the Sewer Use Ordinance. Assistance available to FSEs in complying with the Program requirements are also described.

## 5.1 Compliance Procedures

The current inspection and inspection documentation procedures for the FOG Control Program are listed below.

#### Inspection

The City's designated FOG Control Program inspectors follow a checklist in inspecting each FSE. The checklist is included in the FOG Control Program Manual in Appendix A. During inspection, items to be checked include:

#### **Inside Areas**

- 1. Screens installed in FOG disposal sinks and floor drains.
- 2. Verification of proper waste food handling practices (solid food from pots, pans, fryers, utensils, and dishes are scraped into a trash container; no waste food in sinks; pots and utensils are dry wiped prior to washing).
- 3. Floors are swept before mopping and floor drains are not removed to dispose of sweeping debris.
- 4. Temperature of faucet water is not over 140°F and water heater temperatures are set accordingly.
- 5. Any grease spills on floors are cleaned promptly using towels and absorbent materials, and that wet mops are only used to remove trace residues.
- 6. Proper spill clean-up kits are available in the facility.
- 7. Waste grease containers with lids are available and used for collecting used oil and grease.
- 8. Proper signage on grease control and list of Best Management Practices (BMPs) are mounted on the wall in a visible location to employees.
- 9. Exhaust hoods are properly maintained to prevent discharge of grease to roof areas and washed off to storm drains during rains.

#### **Outside Areas**

- 10. Outside grease containers are covered and closed.
- 11. No grease spills observed on pavement or other surfaces from transporting grease to outside containers.
- 12. Outside grease containers are not leaking and any damaged containers are promptly replaced.
- 13. Employees do not dump oil and grease into a storm sewer.

- 14. Employees do not clean cooking equipment (degrease) outside. The equipment should be scraped and dry wiped indoors and any washing done in utility sinks connected to a grease control device.
- 15. Employees do not wash mats outdoors. Mats should be vacuumed and washed in utility sinks connected to a grease control device.

#### **Employee Training and Maintenance Documentation**

- 16. Employee training log is complete; i.e., employees are getting training about proper FOG handling and learn requirements of the FOG Control Program. Training logs are current and proper training is provided to new employees. Refresher training is provided periodically to all employees.
- 17. The FOG control device inspection/cleaning log is complete. Employees in charge of inspection and cleaning of grease interceptors perform these assignments regularly and keep the grease control devices in good operating condition. Employees are aware of the required frequency of inspection and cleaning of FOG control devices in the facility and inspection and cleaning are performed routinely.
- 18. FOG Hauler manifests are complete.

#### FOG Control Device Condition and Performance

- 19. Checks are made to ensure the grease control device is functioning properly. The device should contain wastewater with the grease layer floating on top and does not enter the outlet pipe.
- 20. Check that the 25% rule is met, i.e., the thickness of the layer of floating grease and bottom solids does not exceed 25% of the operating depth of the device (depth between the invert of the outlet pipe and the bottom of the device).
- 21. The inlet pipe to the grease control device is visible during inspection.
- 22. The outlet pipe of the grease control device is visible during inspection.
- 23. There are no roots growing in the interceptor. Cleaning is required if roots are observed.
- 24. There is no corrosion damage to the grease control device. If metal traps are corroded they should be replaced with new ones, preferably made of plastic. Any corrosion damage to the device must be repaired promptly to avoid more severe deterioration (such as exposed rebar).
- 25. Any broken or missing parts are replaced, especially a missing outlet T.

If a FSE is following the requirements of the FOG Control Program and despite best efforts the effluent from a grease control device still contains unacceptable levels of FOG, the installed device is most likely undersized. In this case, the existing grease control device may need to be modified or replaced accordingly.

#### **Inspection Documentation**

Upon inspection of each FSE, the City's inspector completes an inspection report. The inspection reports for interior FOG control practices and for grease interceptors are provided in Appendix A. Information from the inspection report is entered into the CityWorks Information Management System database used by the FOG Control Program. The database is updated with additional or modified information after each inspection.

#### **Program Fees**

In addition to the FOG permit application fee, an annual fee is assessed to each FSE to recover costs of the FOG Control Program compliance and enforcement activities incurred by the Department of Public Works. These fees cover the cost of field, administrative, engineering, and clerical expenses required to conduct the Program activities. The annual FOG Control compliance fee is currently \$150 as of April 2021. This fee is applied to the customer's sewer service bill.

#### **Inspection and Entry**

Authorized personnel of the City of Jackson, bearing proper credentials and identification, have the right to enter upon all properties subject to the FOG Control Program, at any time and without prior notification, for the purpose of inspection, observation, measurement, sampling, testing or record review, in accordance with this Program.

## 5.2 FOG Disposal

The Mississippi State Department of Health (MSDH) regulates cleaning and disposal of FOG from grease control devices. FOG disposal operators are required to obtain a Certified Pumper license from MSDH. As part of the certification process, pumpers are required to pass an examination on disposal regulations. MSDH also provides a 1-day Certified Pumper course to prepare applicants for the examination.

Mississippi Code Title 41-67-3, Rule 2.1.41 §(2) requires that Certified Pumpers keep a record on all systems cleaned, pumped and disposed of by address, type of treatment unit, amount pumped, and receipt of disposal at a waste treatment facility permitted by the Mississippi Department of Environmental Quality. Proper cleaning must include substantial removal of its contents. Discharge of liquid wastes are allowed only at those specific locations designated by the owners/operators of approved disposal facilities. Discharge of liquid waste into a public sewage collection system, without the consent and permission of the owner/operator of such system, is prohibited. MSDH also requires that records shall be made available at time of any inspection, and that records must be retained for a minimum of 2 years.

The City of Jackson requires that FSEs keep a copy of the disposal manifest required by MSDH to serve as a record of proper FOG disposal. A copy of the disposal manifest is also provided to the City and recorded in the information management system (IMS) database. Review of prior disposal manifests is a component of the normal inspection activities performed by the FOG Control Program compliance inspector.

## 5.3 Program Enforcement

As described in Section 2, the amended City of Jackson Sewer Use Ordinance contains additional provisions for enforcement, abatement, and appeals of the FOG Control Program rules and regulations. In addition to the authority established under these provisions, the City may take the actions listed below.

#### **Enforcement Responses for Rule Violations**

Any person who is in noncompliance and/or violates any provision of the City's FOG Control Program rules and regulations, Program requirements, or a compliance order shall be subject to an enforcement response, including but not limited to a civil penalty and the possibility of water and/or wastewater service termination. Civil penalties or termination of water and/or wastewater service may be appealed in accordance with provisions in the Sewer Use Ordinance. The following situations are subject to an enforcement response by the City:

- FSE operating without an appropriate permit.
- Failure to pay annual permit fees.
- Failure to install grease control equipment or to meet City of Jackson guidelines for grease control equipment design and installation.
- Structural failure of grease control equipment.
- Inadequate maintenance of grease control equipment.
- Pumping records not maintained.
- Failure to report upgrades/changes to existing facilities to the City.
- Failure to correct improper operation or failure of grease control equipment.
- Denial of entry.
- Inadequate FSE employee training and/or recordkeeping.
- Failure to respond to a City of Jackson enforcement action.

#### **Suspension of Services**

The City may suspend water or wastewater service when such suspension is necessary, and without prior notice, when, in the opinion of the City, an actual or threatened discharge:

- 1. Presents or may present an imminent or substantial endangerment to the health or welfare of persons or the environment;
- 2. Causes stoppages, sanitary sewer overflows, or excessive maintenance to be performed to prevent stoppages in the sanitary sewer collection system;
- 3. Causes interference to the wastewater treatment facility; or
- 4. Causes the City to violate any condition of its NPDES permits, agreed orders, or Consent Decree.

The above provisions will be authorized in the Sewer Use Ordinance after amendment.

#### **Enforcement Actions**

The FOG Control Program includes a graduated enforcement process that is designed to encourage FSEs in violation of the ordinance to take the necessary corrective actions to avoid more serious penalties. The graduated enforcement steps are described below.

Notice of Non-Compliance Courtesy Warning. Upon discovery of a non-compliance issue by the FOG compliance inspector, the FSE owner/manager is given a written courtesy warning directing that the noncompliant issue be corrected. A follow-up inspection is then scheduled to confirm that the required corrective action has been completed. The follow-up inspection is generally performed a week later for minor corrective actions, and up to one month for major corrective actions (such is installing a grease interceptor where one is not present). A copy of the Notice of Noncompliance is included in the FOG Control Program Manual in Appendix A.

**Notice of Violation.** If the required corrective action is not performed by the FSE after the follow-up inspection, the FSE owner/manager is informed that the facility is in violation of the Sewer Use Ordinance and a formal Notice of Violation is sent by the Public Works Department staff attorney to the FSE via certified mail. The Notice of Violation requires that the corrective action be completed within five working days. A sample Notice of Violation is included in the FOG Control Program Manual.

Administrative Order. If the required corrective action is not completed as directed by the Notice of Violation, an Administrative Order is issued by the Director of Public Works to the offending FSE owner. The Administrative Order may be one of the following:

- **Compliance Order** A Compliance Order directs the FSE to achieve or restore compliance by a specified date. The Compliance Order documents the non-compliance and sets forth required actions to be accomplished by specific dates.
- Cease and Desist Order A Cease and Desist Order directs the noncompliant FSE to cease illegal or unauthorized discharge immediately or to terminate discharge altogether. The Cease and Desist Order is used for situations where the discharge is causing interference, pass through, environmental harm, or otherwise creating an emergency situation. The order may be issued immediately upon discovery of an emergency situation or following a hearing. In an emergency, the Cease and Desist Order may be given by telephone with a subsequent written order to be served by the Director or his designee before the close of business on the next working day. If the User fails to comply with the Order, the Director or his designee may take independent action to halt the discharge.
- Agreed Order. The Agreed Order is an agreement between the Department and the User. The Agreed Order normally contains three elements: (1) compliance schedules with specific milestone dates; (2) stipulated penalties, damages, and/or remedial actions; and (3) signature by the Director and the FSE representative. An Agreed Order is appropriate when the User assumes the responsibility for its noncompliance and is willing (in good faith) to correct the causes.

The City of Jackson has categorized the various types of violations of the FOG Control Program and assigned a penalty range to each category. Penalty categories are determined by using the Enforcement Response Guide, which is included in Section 7 of the FOG Control Program Manual in Appendix A. All penalty assessments will be approved and signed by the Director of Public Works or his designee. Penalty amounts determined are considered to be an economic deterrent to the non-compliance being addressed. Penalty ranges have been designed to

recover any economic benefit gained by the violation through non-compliance. Violations of other environmental ordinances may also be assessed consistent with the penalties provided in those ordinances.

## 5.4 Compliance Assistance

The City of Jackson provides resources and educational materials to FSEs to assist them in complying with FOG Control Program requirements. Brochures and posters have been prepared that describe the overall purpose of the Program and to communicate Best Management Practices to handle FOG wastes. Sample checklists of required compliance items and BMPs pertaining to FOG control are provided in the FOG Control Program Manual in Appendix A.

Guidance in training FSE employees in proper waste management and good FSE operational practices to prevent FOG discharges, are routinely provided by the FOG compliance inspectors. The City's FOG compliance inspectors also provide proper FOG management instruction to FSE owners or managers during their periodic inspections. FSEs are required to maintain a Training Log documenting the FOG control training provided. A sample Training Log is included in the FOG Control Program Manual.

## 6.0 Public Education

Successful control of FOG discharges into the sewer system from private residences requires educating the public in proper grease disposal practices. The City of Jackson developed a public education and outreach program to inform the City's customers about proper disposal of fats, oils, and grease and reduce grease-related SSOs. Public education on proper FOG management practices will, over time, reduce sewer maintenance efforts and costs, reduce environmental impacts of grease related SSOs, and further protect human health.

#### 6.1 Public Outreach Overview

Key elements of the Jackson FOG Control public education program include the following:

- Flyers and brochures to communicate the FOG control message.
- Press releases/interviews with local print and television media.
- Can the Grease plastic can lid distribution.
- Can the Grease public education video.
- FOG Control Program water bill insert.
- FOG Program webpage on City of Jackson website.
- FOG Program presentations to schools, businesses, and community groups.
- Booths at community events.

Special efforts have been focused on selected groups in Jackson including schools, apartment owners/operators, Jackson Public Housing Authority properties, and other groups where enhanced public education is needed.

## 6.2 Can the Grease Program

Jackson developed a *Can the Grease* public outreach program consisting of a training video and a plastic can lid. The plastic lid is used as a means of encouraging the public to collect used grease and cooking oils instead of disposing of the material in a sink. These lids have been distributed to individuals, apartment complexes, and are given out at public gatherings and events that FOG Program representatives attend. Encouraging use of the can lids to prevent FOG discharges should, over time, reduce the incidences of excess FOG buildup in neighborhood sewers. An illustration of the Jackson used grease can lid is shown on the following page.



Figure 6-1
City of Jackson Can the Grease Lid

The City of Jackson also commissioned a professionally made *Can the Grease* video that describes the harm FOG discharges cause to the sewer system and illustrates proper Best Management Practices for home kitchens to keep used grease and cooling oils out of the sewer system. The video is shown at public meetings when opportunities arise, and is available for viewing on the City of Jackson FOG page on the city's website. A link to the video is provided below.

www.jacksonms.gov/fog-control-program

## 6.3 Summary of Outreach Efforts

Development of the FOG control public outreach program and public education materials commenced upon approval of the FOG Control Program by EPA in 2016. FOG public education efforts began in earnest in early 2018 and most of the program initial objectives to inform the public about the need and benefits of the Program were completed by the end of that year. To date efforts are continuing to publicize the Jackson FOG Control Program to the residents of the City as suitable opportunities arise.

A summary of the FOG Control Program public education implementation timeline is shown on Table 6-1. Example FOG control public education posters are included in Appendix A.

Table 6-1
Jackson FOG Control Program
Public Education Timeline

| Date           | Event  |
|----------------|--|
| September 2017 | Engaged public relations consultant.                                 |
| January 2018   | Completed public education outreach materials.                       |
|                | Hired video production company.                                      |
| March 2018     | Distributed FOG packets at local Food Truck gathering.               |
| April 2018     | Completed custom FOG Control public education video.                 |
| July 2018      | New FOG Control Program web page added to COJ website.               |
| October 2018   | Ordered Can the Grease plastic lids.                                 |
| August 2018    | Submitted FOG Program press release to Jackson Advocate, Clarion     |
|                | Ledger and MS Link newspapers.                                       |
|                | Conducted interview with Jackson Free Press about FOG Program.       |
| September 2018 | Met with sampling of school superintendent/principals to share       |
|                | information about FOG program and inspect school kitchens.           |
|                | Ordered bill stuffers/door hangers to be placed on residents doors.  |
| October 2018   | Presented FOG Program at public meetings held by City Council        |
| October 2018   | members.   |
|                | Presented FOG Program to groups at various church gatherings.        |
| November 2018  | Began distributing 2000 Can the Grease lids to the public.           |
|                | Presented FOG Program at public meetings held by City Council        |
|                | members.   |
|                | Staffed booth at Jackson Medical Mall Health Fair to disseminate FOG |
|                | Program information and hand out can lids.                           |
|                | Placed FOG flyers in libraries and public buildings within the city. |
| January 2019   | Public Works Director described FOG Program on WLBT TV local         |
| January 2019   | newscast.  |
| November 2019  | Distributed FOG packets at holiday meal event.                       |
| December 2019  | Distributed FOG packets at holiday meal event.                       |
| March 2021     | Distributed 56,500 FOG pamphlets in monthly customer water bills.    |

## 7.0 FOG Control Program Implementation

This section describes the resources the City of Jackson is providing to implement the FOG Control Program, the City's FOG Program Information Management System, and performance measures that are used for FOG control. The implementation timeline for the FOG Control Program is also provided.

## 7.1 Resource Requirements

As of April 1, 2021 there were 1085 FSEs within the City of Jackson which includes FSEs licensed by MSDH and non-licensed FSEs such as day care facilities and churches. The City has one full-time staff position to oversee the Program. At present, FOG Program inspection activities are outsourced to a private contractor. The duties performed by the FOG inspection contractor include:

- Perform FSE inspections.
- Complete inspection follow-up activities.
- Initiate enforcement actions and follow-up.
- Provide training to FSE owners/managers.
- Assist with FOG control public outreach efforts.
- Maintain the FOG Program information management system.

The FOG inspection team consists of two full time FOG compliance inspectors that have been badged by the City to insure right-of-entry into FSEs. The inspectors are equipped with tools and equipment to open and measure grease traps and interceptors. They also provide training in FOG Control Best Management Practices to FSE owners and managers. A part-time Supervisor coordinates the FOG inspection activities, receives and reviews FOG inspection checklists, initiates enforcement actions when needed, and maintains the information management system. All staff and resources required to effectively administer the Program have been provided.

## 7.2 Information Management System

The FOG Program Information Management System used is a module of the comprehensive CityWorks infrastructure management platform used by multiple city departments. CityWorks is a GIS-based enterprise asset management system used to manage, track, analyze and score infrastructure assets. The FOG module contains templates used to list all FSEs and other FOG generators, generate FSE FOG inspection schedules, track FOG inspection results by individual FSE, and manage and track FOG enforcement actions. The CityWorks FOG database is updated daily by the FOG inspection team supervisor.

### 7.3 Performance Indicators

FOG Control Program performance indicators have been developed to allow for continuous measurement and evaluation of the Program activities. The performance indicators are used

to determine if established goals and level of service are being met and if not, what adjustments need to be made to achieve Program objectives. The FOG Program performance indicators as of April 1, 2021 are shown on Table 7-1.

Table 7-1
FOG Program Performance Indicators

| Parameter                                 | No.  | Remarks  |
|---|------|--|
| Number of FSEs                            | 1085 | Adjusted weekly for closures and new openings          |
| Number of FSEs inspected                  | 1001 | All but 4 of the remainder are churches with kitchens  |
| Percent FSEs inspected                    | 92%  |  |
| Total inspections performed to date       | 2981 |  |
| Average inspections completed per day     | 7.0  | With two full time inspectors                          |
| Average no. inspections/FSE               | 3.0  | All accessible FSEs have been inspected at least twice |
| FOG hauler manifests received             | 1536 | Most FSEs on regular pumping cycle                     |
| Noncompliant facilities to date           | 73   | Couresy warnings issued                                |
| Noncompliant warning letters issues       | 8    | Most noncompliant FSEs come into compliance            |
| Formal Notice of Violation letters issued | 0    |  |
| FSEs with no grease traps                 | 87   | NOVs issued if noncompliant after Feb. 28. 2021        |
| Percent of FSEs with grease traps         | 91%  |  |

April 1, 2021 Data

The FSEs that have not been inspected have been difficult to access to date. Efforts are continuing by the FOG inspection team to perform the required inspection of these facilities. A list of the inaccessible facilities is shown below. None are state licensed Food Service Establishments.

- 1 Nightclub
- 1 School
- 1 State office building
- 1 Governor's Mansion
- 80 Churches

FSEs existing at the time the FOG ordinance was adopted without grease traps were initially grandfathered unless they contributed to a FOG problem in the sewer system. This forbearance was canceled in 2020 and all existing FSEs without grease traps or interceptors were required to install the required grease control device by February 28, 2021. Any noncompliant FSE identified after that date is issued a Notice of Violation by the City with specified enforcement actions to follow. A list of the FSEs that have been inspected to date without grease traps is shown on Table 7-2.

Table 7-2
FSEs Without Grease Traps

| No. | No. Facility Prior    |   | Remarks   |  |  |  |  |  |  |  |
|-----|-----------------------|---|---|--|--|--|--|--|--|--|
| 7   | Restaurants           | 1 | Initial enforcement priority  |  |  |  |  |  |  |  |
| 1   | Nursing homes         | 1 | Initial enforcement priority  |  |  |  |  |  |  |  |
| 4   | Convenience stores    | 1 | Initial enforcement priority  |  |  |  |  |  |  |  |
| 2   | Auto shops            | 1 | Initial enforcement priority  |  |  |  |  |  |  |  |
| 2   | Bakeries/donut shops  | 1 | Initial enforcement priority  |  |  |  |  |  |  |  |
| 4   | 4 Ice cream parlors 2 |   | 2 are snow cone shops only with no ice cream preparation                  |  |  |  |  |  |  |  |
| 2   | Hotels                | 2 | 2 of the hotels do not cook onsite  |  |  |  |  |  |  |  |
| 2   | Schools               | 3 | Most schools do not cook food onsite                                      |  |  |  |  |  |  |  |
| 45  | Day care facilities   | 3 | Most do not cook food onsite but may have a kitchen                       |  |  |  |  |  |  |  |
| 9   | Churches              | 3 | Some do not cook food onsite; others cook only occasionally               |  |  |  |  |  |  |  |
| 3   | Coffee shops          | 3 | Although classified as FSE no cooking is performed onsite                 |  |  |  |  |  |  |  |
| 6   | Miscellaneous         | 3 | 2 community centers, 1 athletic stadium, 1 food distributor, 1 bingo hall |  |  |  |  |  |  |  |
| 87  | TOTAL                 |   |   |  |  |  |  |  |  |  |

The performance and effectiveness of the FOG Control Program using the key performance measures are tracked and documented monthly. Results are summarized in the quarterly reports to EPA/MDEQ.

## 7.4 Implementation Timeline

During the implementation phase of the Program, the City completed the following:

- Secured staff to perform FOG Control Program inspection and administration.
- Acquired resources required by FOG control inspection team.
- Coordinated with City's code compliance department on enrollment of new FSEs in the Program and FOG control equipment inspections.
- Developed detailed FOG control equipment standards, specifications, and guidance for FSEs.
- Developed FOG control equipment management, operation, and maintenance standards.
- Developed inspection protocols, check lists, and documentation procedures.
- Developed enforcement mechanisms in conformance to updated Sewer Use Ordinance.
- Developed compliance assistance resources and materials.
- Formulated and promulgated public education program for FOG control.
- Developed FOG Program information management system module on CityWorks asset management platform.

The above elements were developed as described in this updated FOG Control Program report. The original implementation schedule for the Program was revised to reflect the actual implementation timeline and is shown on **Figure 7-1**. The FOG Control Program has been in full operation since February 20XX and the City of Jackson is in full compliance with the FOG requirements of the Consent Decree. The Public Works Department is fully committed to continue to enforce full compliance with all FOG Control Program requirements.

Figure 7-1
Fats, Oils and Grease Control Program
Implementation Timeline

|                                    | 2016 2017 |                |       |        |        |        |   |     | 2018 |        |        |   |   |     |   |           | 2019 |      |    |    |          |        |        |        | 2020   |        |          |      |   |        |   |        |        | 2021   |        |      |          |        |
|------------------------------------|-----------|----------------|-------|--------|--------|--------|---|-----|------|--------|--------|---|---|-----|---|-----------|------|------|----|----|----------|--------|--------|--------|--------|--------|----------|------|---|--------|---|--------|--------|--------|--------|------|----------|--------|
| Task                               | 8         | 9 10 1         | 11 12 | 1 2    | 3      | 4 5    | 6 | 7 8 | 9    | 10     | 11 12  | 1 | 2 | 3 4 | 5 | 6 7       | 8    | 9 10 | 11 | 12 | 1 2      | 3 4    | 5      | 6 7    | 8      | 9 10   | 11       | 12 1 | 2 | 3 4    | 5 | 6 7    | 8      | 9 10   | 11     | 12 1 | 2 3      | 3 4    |
| FOG Control Program                |           | Implementation |       |        |        |        |   |     |      |        |        |   |   |     |   | Operation |      |      |    |    |          |        |        |        |        |        |          |      |   |        |   |        |        |        |        |      |          |        |
| CMOM Report Approval by EPA        |           |                |       |        |        |        |   |     |      |        |        |   |   |     |   |           |      |      |    |    | П        |        |        |        | П      |        | П        |      | П |        | П |        |        |        | П      |      |          |        |
| FOG Control Program Activities     |           |                |       |        |        |        |   |     |      |        |        |   |   |     |   |           |      |      |    |    |          |        |        |        |        |        |          |      | П |        |   |        |        |        | П      |      |          |        |
| Program Organization and Staffing  | П         |                |       |        |        |        |   |     |      |        |        |   |   |     |   |           |      |      |    |    | $\Box$   |        | П      |        | П      |        | П        |      | П | $\top$ | П |        | П      |        | П      |      |          |        |
| Program Resources                  |           |                | Т     |        |        |        |   |     |      | П      | Т      | П | П | Т   | П |           | П    |      | П  |    | $\Box$   |        |        |        | П      |        | П        |      | П | Т      | П | Т      | П      |        | П      |      |          |        |
| Equipment & MOM Standards          |           |                |       |        |        |        | П |     |      |        |        |   |   |     |   |           |      |      | П  |    |          |        | $\Box$ |        |        |        |          |      | П |        | П |        |        |        | П      |      |          |        |
| Public Education Program           |           |                |       |        | $\Box$ |        | П |     |      |        |        |   |   |     |   |           |      |      | П  |    | $\sqcap$ |        | П      |        | $\Box$ |        | П        |      | П | $\top$ | П |        | П      |        | П      |      |          |        |
| Inspection & Enforcement Protocols | $\Box$    |                | Т     |        | $\Box$ |        | П |     |      |        |        |   |   |     | П |           |      |      | П  |    | $\top$   | $\top$ | П      |        | П      |        | П        |      | П | $\top$ | П | $\top$ | $\Box$ |        | П      |      |          | $\top$ |
| Adopt New Sewer Use Ordinance      | $\Box$    |                |       |        | $\Box$ |        | П |     |      |        |        | П |   |     | П |           | П    |      | П  |    | $\top$   | $\top$ | П      | $\neg$ | $\Box$ |        | П        |      | П | $\top$ | П |        | $\Box$ |        | П      |      |          | $\top$ |
| Compliance Assistance Resources    | $\Box$    |                |       | $\Box$ | $\top$ | $\top$ | П |     | П    | $\Box$ |        | П |   |     |   |           |      |      |    | Ţ  | $\top$   | $\top$ | П      | $\neg$ | $\top$ |        | П        |      | П | $\top$ | П | $\top$ | $\Box$ |        | $\Box$ |      | $\Box$   | $\top$ |
| Information Management System      | $\Box$    |                |       | $\Box$ | $\Box$ | $\top$ | П |     | П    | $\top$ | $\top$ | П |   |     | П |           |      |      |    |    |          | $\top$ | П      | $\top$ | П      | $\top$ | $\sqcap$ |      | П | $\top$ | П | $\top$ | П      | $\top$ | $\Box$ |      | $\sqcap$ |        |
| FOG Program Inspections            |           |                |       |        |        |        |   |     |      |        |        |   |   |     |   |           |      |      |    |    |          |        |        |        |        |        |          |      |   |        |   |        |        |        |        |      |          |        |

# Appendix A

# FOG Control Program Manual





## Fats, Oils, and Grease (FOG) Control Program Manual







**Department of Public Works** 

Charles Williams, Jr. PE PhD Director

February 2021

#### **Contents**

## 1. Fats, Oils and Grease Control Requirements for Food Service Establishments

- 1.1 FOG Control Permit Form required by new Food Service Establishments (FSEs) and industrial/automotive facilities requesting a building permit. Requires information about the applicant, facility details, and a \$200 fee to cover plan review costs and inspection of FOG control device installation. Also applies to changes of ownership and facility remodels.
- 1.2 Grease Control Device Standards Department of Public Works minimum standards for FSE grease control devices. Standards are provided for exterior grease interceptor tanks, automated interior grease traps, and manual interior grease traps. Default sizing guidelines are provided together with alternative grease control device sizing procedures, either of which may be used. Also listed are prohibited discharges to grease control devices and certain equipment restrictions. These standards are consistent with the International Plumbing Code adopted by the City.
- 1.3 Fact Sheets General information is provided on (1) Fats, Oils and Grease and the City of Jackson FOG Control Program; (2) Grease Traps; (3) Grease Interceptors; and (4) Permitting and Compliance Inspections of FSEs.
- 1.4 FSE Inspection Record A copy of the form used by FOG Program inspectors to perform periodic inspections of FSEs for program compliance. The form lists the elements that are included in the inspection.
- 1.5 Notification of Non-Compliance A courtesy letter furnished to the facility noting a FOG Program violation and requirement for a follow-up inspection.
- 1.6 Notice of Violation If the violation has not been corrected by the follow-up inspection, the facility will be issued a Notice of Violation as set forth in the Sewer Use Ordinance. Facilities receiving NOVs will be subject to fines or other penalties.
- 1.7 Licensed Waste Haulers A list of licensed liquid waste haulers operating in the Jackson area that pump out grease interceptors.

#### 2. Food Service Establishment Record Keeping Requirements

FSEs within the City of Jackson are required to maintain records pertaining to the FOG Control Program on-site, which will be reviewed during FOG Program compliance inspections. Forms are provided for:

- 2.1 FSE Manager FOG Training Record Record and acknowledgment that the FSE Owner/ Manager received initial instruction on the City of Jackson FOG Control Program and FSE employee training requirements.
- 2.2 FSE Employee FOG Training Record Record of specific employees trained in kitchen BMPs and grease control device maintenance procedures.

- 2.3 Grease Control Device Maintenance Record A record of grease control device inspections performed, maintenance needs identified, and grease control device cleanings performed by a licensed liquid waste hauler with the quantities of FOG removed.
- 2.4 Waste Hauler Manifest A record for each grease pumping operation performed by a licensed liquid waste hauler. This is a three-part form with the pink copy retained by the FSE for review by FOG Program inspectors, and the original and yellow copy given to the waste hauler. The yellow copy is retained by the waste hauler, and the original white copy will be left with the disposal site operator. The FOG Program inspectors will review the original copies at the disposal site to confirm that the liquid waste removed from the FSE was properly disposed of.

#### 3. Food Service Establishment Best Management Practices

FSE are required to train their employees in kitchen Best Management Practices (BMPs) and grease control device monitoring and maintenance. This section includes materials that can be used in FOG control employee training:

- 3.1 FOG Control and Kitchen BMPs training video This video is available for viewing or downloading from the City of Jackson website: <a href="https://www.jacksonms.gov">www.jacksonms.gov</a>
- 3.2 FSE Fats, Oils and Grease Flow Chart A diagram illustrating the proper flow of FOG material from the FSE kitchen to an approved disposal site.
- 3.3 Kitchen BMPs Flyer A two-page flyer summarizing FOG control best management practices.
- 3.4 FOG Control Posters Two posters that can be mounted above sinks or other areas in the FSE kitchen to remind employees of the need for FOG control.
- 3.5 Mobile Food Unit Flyer A one-page summary of requirements for fats, oils and grease control by Food Trucks operating in the Jackson service area.
- 3.6 National Restaurant Association FOG Control BMPs A detailed explanation of best practices for effective grease control management.

#### 4. FOG Control Public Education

As an important component of the City of Jackson Fats, Oils and Grease Control Program, public outreach efforts are being made to foster FOG control Best Management Practices in private residences, apartments, and to the general public at large. This section includes educational materials that are being used to inform individuals about proper FOG Control in the home.

#### 5. Sand/Oil Interceptors for Automotive and Industrial Facilities

Proper FOG control is also required of any automotive or industrial facility with the potential for discharging sand, oil, or hydrocarbons to the city sewer. This includes auto repair shops, auto body shops, radiator repair shops, car washes, fleet service facilities, any private or public wash rack or slab used for cleaning machinery or machine parts, and any similar facility.

Information is provided to inform these facilities on proper sand/oil control from their operations. Provided are:

- 5.1 Sand/Oil Interceptor Fact Sheet A flyer summarizing the requirements for sand/oil interceptors and Best Management Practices for facility operations and maintenance.
- 5.2 Sand/Oil Interceptor Device Standards Description, application, and sizing information for sand/oil interceptors to trap oils and sediment to keep these materials out of the city sewer.
- 5.3 Waste Hauler Manifest A record for each sand/oil interceptor pumping operation performed by a licensed liquid waste hauler. This is a three-part form with the pink copy retained by the facility for review by FOG Program inspectors, and the original and yellow copy given to the waste hauler. The yellow copy is retained by the waste hauler, and the original white copy will be left with the disposal site operator. The FOG Program inspectors will review the original copies at the disposal site to confirm that the liquid waste removed from the facility was properly disposed of.

#### 6. FOG Control Program Sewer Use Ordinance

A copy of the new ordinance amending Article II. – Sewage Disposal Standards to create a Fats, Oils, and Grease (FOG) Control Program is attached for reference.

#### 7. Enforcement Response Guide

As set forth in the new Sewer Use Ordinance, the City has categorized the various types of violations of the FOG Control Program, and assigned a penalty range to each category. Penalty categories are determined by using the Enforcement Response Guide provided in this Section. All penalty assessments will be approved and signed by the Director of Public Works or the Director's designee. Penalty amounts determined are considered to be an economic deterrent to the noncompliance being addressed. Penalty ranges have been designed to recover any economic benefit gained by the violation through noncompliance. The ranges of penalties for any violation of the requirements and standards for the FOG Control Program are as follows:

CATEGORY 0 = NO PENALTY
CATEGORY 1 = \$200.00 TO \$500.00
CATEGORY 2 = \$500.00 TO \$1,000.00
CATEGORY 3 = \$1,000.00 TO \$10,000.00
CATEGORY 4 = DIRECT LEGAL ACTION

Assessments for damages or destruction of the facilities of the wastewater treatment plant, and any penalties, costs, and attorney's fees incurred by the City of Jackson as the result of the illegal activity, as well as the expenses involved in enforcement, are not part of this penalty assessment procedure.

## Section 1 – Fats, Oils and Grease Control Requirements for Food Service Establishments

- 1.1 FOG Control Permit Application Form
- 1.2 Grease Control Device Standards
- 1.3 Fact Sheets
- 1.4 FSE Inspection Record
- 1.5 Notification of Non-Compliance
- 1.6 Notice of Violation
- 1.7 Licensed Waste Haulers



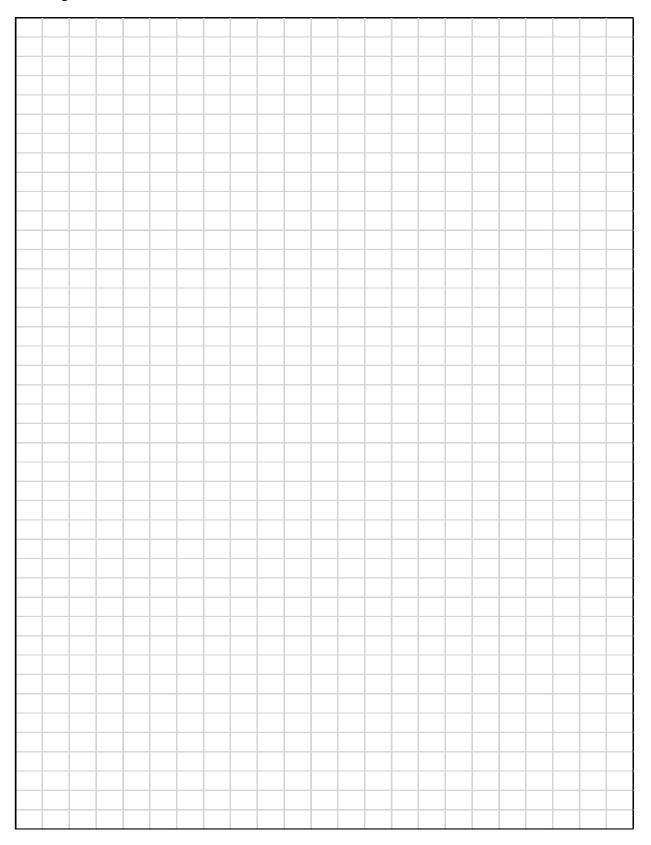
#### **Fats, Oils and Grease Control Program**

Department of Public Works 200 S. President Street / PO Box 17 Jackson, MS 39205

#### **FOG Control Permit**

| Million                    | □ New □ F  | Remodel $\square$ Change     | of Ownership                            |
|----------------------------|--|------------------------------|---|
| Facility Name:             |  |                              |   |
| Address:                   |  |                              | Jackson, MS                             |
| Owner:                     |  | Phone No                     | )                                       |
| Email Address:             |  |                              |   |
| Authorized Representa      | ative (if other than owner   | r):                          |   |
| Mailing Address (if d      | lifferent from above)  |                              |   |
| Address:                   |  | Phone No.                    | :                                       |
| Ki                         | itchen Fixtures Connec   | ted to Grease Control        | Device                                  |
| Three compartme            | ent sinks Tilt K   | Kettle                       | Wok Ranges                              |
| Two compartmen             |  |                              | Other:                                  |
| One compartmen             | t sinks Garba  | age Disposal                 |   |
|                            | Type of Grea   | se Control Device            |   |
| Exterior Grease            | Automated Interior   | Manual Interior              | Sand/Oil                                |
| Interceptor Capacity       | Grease Trap  | Grease Trap                  | Separator <sup>1</sup>                  |
| □ 750 □ 1000               | Mfg:   | Mfg:                         | Mfg:                                    |
| □ 1000 □ 2500              |  |                              |   |
| □ 1500 □ 3000              | Size/Capacity:   | Size/Capacity:               | Size/Capacity:                          |
|                            |  |                              |   |
|                            |  |                              | <sup>1</sup> Automotive facilities only |
| supervision in accordance  | aw that this document and all<br>with a system designed to ass<br>e information submitted is tru | ure that qualified personnel | properly gather and evaluate the        |
| Signature of Authorized Re | epresentative  |                              |   |
| Application and FOG Cont   | trol Permit approved:   Yes  | s □ No Permit No.:           |   |
| April Sawyer, FOG Progra   | .m Coordinator   | <br>Date                     | Application Fee: \$200.00               |

Drawing of kitchen layout, or automotive facility layout for sand/oil separators, and plumbing showing location of grease control device(s) and sampling points. Attach calculations to support size of grease control device selected and manufacturer information on the unit.





## FOG Control Program GREASE CONTROL DEVICE STANDARDS

Food Service Establishments within the City of Jackson shall conduct their operations in such a manner that grease is captured on the facility premises and then properly disposed of. All Food Service Establishments are required to have an approved and adequately sized, properly installed, and properly maintained grease control device.

The following must be provided with the building permit application:

- I. FOG Control Plan.
- 2. Site plan showing kitchen layout, drain lines, and grease control device location.
- 3. Grease control device sizing calculations.
- 4. Manufacturer's drawing, specifications, and performance information on grease control device.

At least one of the following grease control devices must be installed as approved by City:

- 1. **Exterior Grease Interceptor Tank** Available in various capacities from 750 to 3000 gal. If more than 3000 gal capacity is required, multiple units shall be installed. The unit shall be the following, or City approved equal:
  - Schier Products Big Foot polyethylene grease interceptor.
  - Zurn Industries Proceptor Greenturtle fiberglass grease interceptor.
  - ASTM C1613 compliant precast concrete grease interceptor.
- 2. **Automated Interior Grease Trap** If space is not available for an exterior grease interceptor tank, an automated interior hydromechanical grease trap shall be used. The unit shall be properly sized according to the manufacturer's recommendations. The unit shall be the following, or City approved equal:
  - Grease Guardian X Series by Frontline Engineering.
- 3. **Manual Interior Grease Trap** Where no frying is being performed, a manually cleaned grease trap may be used. The unit shall be properly sized according to the manufacturer's recommendations. The unit shall be the following, or City approved equal:
  - Schier Products Great Basin polyethylene interior grease trap.
  - Zurn Industries Model Z1170 fiberglass interior grease trap.
  - Wade Model 5100 steel interior grease trap.

If no calculations are furnished justifying the proposed grease control device size and approved by City, the unit must be sized according to the following criteria:

#### 1. Exterior Grease Interceptor Tank

The total wet volume shall be not less than 750 gallons and provide no less than thirty minutes retention time based on peak flow, where peak flow is the greater of the flow rate based on fixture units or the following flow rates:

| Nominal Drain<br>Pipe Size, in. | Maximum Flow<br>Rate, gpm | Minimum Wet<br>Volume, gal |
|---------------------------------|---------------------------|----------------------------|
| 1-1/2                           | 7.5                       | 750                        |
| 2                               | 20                        | 750                        |
| 3                               | 60                        | 1,800                      |
| 4                               | 125                       | 3,750                      |
| 5                               | 229                       | 6,870                      |
| 6                               | 375                       | 11,250                     |

If more than 3000 gal capacity is required, multiple units shall be installed.

#### 2. Automated or Manual Interior Grease Trap

#### Sinks and Floor Drains

| Calculations                  | Units | Quantity | Remarks   |
|-------------------------------|-------|----------|---|
| Total Sink Volume             | gal   |          | Measure LxWxH of each sink. Total the cu. in. and divide by 231                           |
| Typical liquid volume, 75%    | gal   |          | Multiply total volume in gal x 0.75 since sinks are typically only filled to 75% capacity |
| Total sink drain rate         | gpm   |          | Based on 1 min to completely drain; use number above                                      |
| Floor drains                  | gpm   |          | No. of floor drains x 0.75  |
| Required grease trap capacity | gpm   |          | Sink drain rate + floor drains  |
| Required grease trap capacity | lbs   |          | Grease retention capacity = number above  |

Flow control device required on grease trap to limit max flow to its rated capacity

#### **Dishwashers**

Provide a grease trap rated at not less than the dishwasher manufacturer's rated discharge or drain rate from the unit. If the dishwasher drain rate is not known the following table may be used:

| Dishwasher Tank Capacity, gal | 10-20 | 20-30 | 30-50 | 50-70 | 70-100 |
|-------------------------------|-------|-------|-------|-------|--------|
| Grease Trap Capacity, gpm     | 7.5   | 10    | 12.5  | 17.5  | 50     |
| Grease Trap Capacity, lbs     | 15    | 20    | 25    | 35    | 100    |

Flow control device required to limit max flow to rated grease trap capacity. Connection of a high temperature (more than 140°F)/high flow dishwasher to a grease trap or grease interceptor is prohibited. An automated hydromechanical grease trap cannot be used on a dishwasher.

#### Wok Range

Required grease trap capacity: 12 gpm / 25 lbs

Multiple grease traps may be required depending on total capacity needed and facility layout. For all interior grease traps, a flow control device is required to limit the maximum flow to the maximum rated capacity of the unit used (typically 50 gpm).

#### **Alternate GCD Sizing Procedure**

If the establishment desires to use an alternate procedure to size the grease control device, it shall be sized according the following criteria.

- (1) Third party (e.g., PDI/ASME) certified device sized based on the projected flow rate, FOG and solids loading rate, proposed frequency of FOG and solids removal, maximum certified FOG containment capacity, and certification testing effluent concentration for FOG equal to or less than the oil and grease concentration in Jackson Code of Ordinances Section 122-173 (maximum 100 mg/L).
- (2) Calculations prepared by a Mississippi Professional Engineer demonstrating that the FOG effluent concentration is equal to or less than the oil and grease concentration in Jackson Code of Ordinances Section 122-173. Calculations shall include flow rate, rise and settling velocities, short-circuiting, inlet, baffle and outlet effects on velocity distribution, FOG and solids loading rate, and frequency of FOG and solids removal.

#### Prohibited Discharges and/or Restricted Equipment

- (I) The installation and use of garbage grinders (disposals) in commercial-food establishments is prohibited. Special permission for a garbage grinder may be granted by the City with justification, but only if a 1,000 gallon or larger exterior interceptor is in use.
- (2) The connection of high-temperature (more than 140°F)/high-flow dishwashers to a grease trap or grease interceptor is prohibited.
- (3) Prohibited discharges to grease control devices: sewage; yellow grease (spent oil from deep frying); additives or chemicals designed to absorb, purge, consume, treat, or otherwise eliminate fats, oils, and grease. The use of enzymes or bacterial cultures designed to disperse grease is prohibited unless specifically approved in writing by the Mississippi Department of Health and the City of Jackson.



## The City FOG Control Program ACKSON WHAT IS FOG? FACT SHEET

#### What is FOG?

FOG - fats, oils, and grease - are the natural byproducts of food preparation and cooking. When FOG gets into the sewer system, it blocks lines and may result in sewer overflows that damage private property and the environment. Because of the amount of food produced by food service establishments (FSEs), this puts them on the front line of FOG prevention.



#### Why is FOG an issue for my business?

Without proper management practices, FOG will accumulate in your sewer pipe. Restaurants and other food service establishments can be fined, and water and sewer service interrupted, due to blockages and backups. FSEs can also be held financially responsible for damages resulting from blockages and backups.



Grease Accumulation in Sewer

#### **FOG Control Program**

The City of Jackson Code of Ordinances includes a *FOG Control Program* to enforce proper FOG management practices, educate FSEs and the public on the importance of FOG control, and provide information on Best Management Practices (BMPs) to keep FOG out of the sewer system.



**Grease Control Device** 

#### **FOG Control Devices**

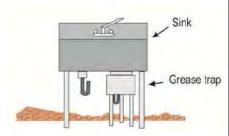
Grease control devices – grease traps or grease interceptors – are required to collect all grease generated by the establishment on the premises. Grease enters food establishment grease traps from dishwashers, sinks, floor drains, and dumpster pads. Grease traps and grease interceptors are used to recover the grease and protect the sewer lines. Blockage of sewer lines occurs when these grease control devices are not maintained properly. Proper maintenance requires the entire contents of a grease trap to be removed weekly or monthly as needed and disposed of by a licensed waste hauler.



## FOG Control Program GREASE TRAP FACT SHEET

#### What Are Grease Traps?

Grease traps are small grease removal devices (usually 50 gallons or less in capacity) installed indoors, typically under a kitchen sink, with the purpose to prevent FOG in the kitchen wastewater from entering the sewer system. Grease traps operate by slowing down wastewater passing through the trap and retaining it long enough to allow contaminants with specific gravities different than water to separate out by gravity flotation (FOG) and settling (solids).



#### **Necessary Elements for Grease Separation**

- Retention time (based on water flow rate from the sink or other source)
- Water temperature less than I40°F
- Flow rate restriction to control turbulence

#### **Grease Trap Types**

- Automated, or hydromechanical, grease traps are used in locations with a heavy FOG load and
  where there is no space for an exterior grease interceptor tank. These units remove grease
  continuously to a separate container for offsite disposal.
- Manual grease traps may be approved for smaller operations where no frying is performed. FOG
  from these units must be manually removed, typically on at least a weekly basis.

#### Critical factors for grease trap effectiveness

- Sufficient capacity
- Maintenance/cleaning frequency

#### **Grease Trap Surges**

When a grease trap is not properly maintained, it will either block up or surge:

- Sealed grease traps will block and back up into the kitchen or production area
- Non-sealed grease traps will surge and spill onto the floor

#### **Minimum Maintenance Standards**

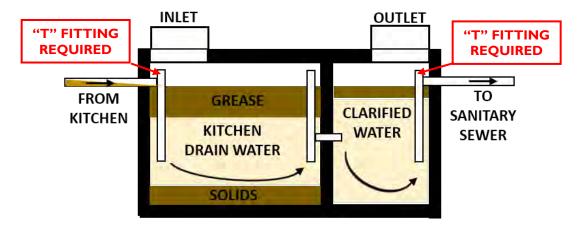
- DO ensure the grease trap is easily accessible for maintenance and inspection.
- Do NOT pour FOG waste directly into the grease interceptor.
- DO NOT use cleaning chemicals (emulsifiers or solvents).
- DO inspect the grease trap to determine when it requires cleaning.
- DO have the grease trap cleaned by an FSE employee or a licensed FOG hauler as needed. A log must be kept of cleaning operations.



## FOG Control Program GREASE INTERCEPTOR FACT SHEET

#### What Are Grease Interceptors?

Grease interceptors are large grease removal devices (minimum capacity 750 gallons) installed outside of the FSE to prevent FOG in the kitchen wastewater from entering the sewer system. Grease interceptors operate by slowing down wastewater passing between the interceptor compartments and retaining it long enough to allow contaminants to separate out by gravity flotation (FOG) and settling (solids). The volume of the tank allows the grease to slow down, cool, and rise to the top. A baffle helps control the grease in the trap. If the grease, solids and bottom sludge are not completely pumped out every three months or as needed, new grease has nowhere to collect and escapes to the sewer.



#### **Necessary Elements for Grease Separation in the Interceptor**

- Retention time (based on water flow rate from FSE)
- Water temperature less than I40°F

#### **Critical Factors for Grease Interceptor Effectiveness**

- Sufficient capacity
- Maintenance/cleaning frequency
- "T" fittings on inlet and outlet to keep grease out of building and City sewer pipes.

#### Minimum Standards

- DO ensure the interceptor has an access point to each compartment.
- Do NOT pour FOG waste directly into the grease interceptor.
- DO NOT use cleaning chemicals (emulsifiers or solvents).
- DO inspect the grease interceptor to determine when it requires cleaning.
- DO schedule the interceptor cleaning by a licensed FOG hauler as needed.
- DO keep records of proper maintenance on-site.



## PERMITTING AND COMPLIANCE INSPECTION

#### **Reason for FOG Program**

The City of Jackson is committed to providing residents with a safe and cost effective wastewater collection and treatment system. Grease blockages in sewer lines are the major cause of sewer overflows and buildups in our collection system, severely affecting maintenance and operational costs. When you maintain and operate your grease recovery system properly, you are playing an important role in protecting public health and the environment.

The sewer system in Jackson is designed to safely collect and transport sewage to one of our three Wastewater Treatment Plants. The City of Jackson faces enforcement actions if sewer overflows occur. Accordingly, the City is taking a proactive and aggressive approach to sewer line protection, maintenance, and repair. Time and resources are being devoted to educating our citizens on appropriate methods for stopping overflows. A comprehensive fats, oils and grease (FOG) program is a vital part of this effort.

#### **FOG Control Plan Requirements**

Each food service establishment that is required to install a Grease Control Device must prepare a FOG Control Plan for review and approval by the Department of Public Works. The FOG Control Plan will identify the Grease Control Device to be used and the equipment to be connected to it. An application fee is required for the FOG Control Plan at the rate established in the Jackson Sewer Use Ordinance.

#### **FOG Program Compliance Inspections**

FOG Program Inspectors examine food service establishments (FSE's) to check compliance with FOG Program regulations. An inspector, bearing proper credentials, shall be permitted to enter and inspect the property without prior notification. Food service establishments with problem grease traps are inspected more frequently. An annual fee is charged to all FSEs to cover the cost of the FOG compliance program at the rate established in the Jackson Sewer Use Ordinance.



FOG Program inspectors regularly visit FSEs to ensure compliance with ordinance standards and check the condition of the grease trap and, for grease interceptors, to see if it's meeting the 30% rule. Maintenance and waste hauling records are also checked.





**30 Percent Rule**: Requires that the depth of bottom solids plus the oil/grease layer on top shall not be greater than 30 percent of the total tank operating depth.



Only state-licensed grease haulers can dispose of collected grease or pump a grease interceptor.



#### **Fats, Oils and Grease Control Program**

Department of Public Works 200 S. President Street / PO Box 17 Jackson, MS 39205

### **FSE Inspection Record**

| FSE#          | F  | Inspector: FSE Name: Phone:  |                       |                          |                       |                 |  |  |
|---------------|--|------------------------------|-----------------------|--------------------------|-----------------------|-----------------|--|--|
| 1. Busines    | ss Status – F  | Provide details of any chang | e in busines          | ss status, na            | me, or own            | ership:         |  |  |
| Specify locat | 2. Grease Control Devices Specify location and type of each Grease Control Device in the FSE. Note any modifications such as change in dimensions or connections to the GCD since previous inspection. |                              |                       |                          |                       |                 |  |  |
| GCD ID        | Location   | Location Details             | Manual<br>Grease Trap | Automated<br>Grease Trap | Grease<br>Interceptor | Same as Before? |  |  |
|               |  |                              |                       |                          |                       |                 |  |  |
|               |  |                              |                       |                          |                       |                 |  |  |
|               |  |                              |                       |                          |                       |                 |  |  |
|               |  |                              |                       |                          |                       |                 |  |  |
| Notes:        |  |                              |                       |                          |                       |                 |  |  |
|               |  |                              |                       |                          |                       |                 |  |  |



## City of Jackson FOG Program FSE Inspection Record

| <b>FSE</b> | Name |  |  |
|------------|------|--|--|
|            |      |  |  |

| 3. BI    | MP C   | ompliance                               | <b>.</b>  |                   |                                    |                           |
|----------|--------|---|-----------|-------------------|------------------------------------|---------------------------|
| 1        |        | No screens on sink/floor drains         |           |                   |                                    | No. Boxes<br>Checked:     |
| 2        |        | Waste foo                               | od in sir | nk                |                                    |                           |
| 3        |        | Debris or                               | loose s   | screws in floor c | drains                             |                           |
| 4        |        | Spilled gr                              | ease or   | n floor           |                                    | Previous Inspection Date: |
| 5        |        | No spill c                              | leanup    | kit ready         |                                    |                           |
| 6        |        | No waste yellow grease container        |           |                   | Previous Inspection Boxes Checked: |                           |
| 7        |        | No BMP signage on wall                  |           |                   |                                    |                           |
| 8        |        | Employee training log incomplete        |           |                   |                                    |                           |
| 9        |        | GCD inspection/cleaning logs incomplete |           |                   | complete                           |                           |
| 10       |        | FOG haul                                | er reco   | ords incomplete   |                                    |                           |
| Enfo     | rcem   | ent Action                              | ıs:       |                   |                                    |                           |
| If less  | than   | 7 boxes che                             | cked:     |                   | Verbal Warnin                      | ıg                        |
| If mor   | e thar | n 7 boxes ch                            | ecked:    |                   | Courtesy Lette                     | er                        |
| If first | ,      |   |           | Verbal Warnin     |                                    |                           |
|          |        |   | В         | BMP Inspection    | n Results                          |                           |
|          |        |   |           | n Compliance      |                                    |                           |
|          |        |   | 🖳         | Ion-Compliance,   | , Verbal Warn                      | ing                       |
|          |        |   | —<br>     | lon-Compliance,   | , Courtesy Let                     | ter                       |



## City of Jackson FOG Program FSE Inspection Record

| FSE Name |  |
|----------|--|
|----------|--|

| 4. Grease     | 4. Grease Control Device Inspection |                            |            |           |       |   |  |  |
|---------------|-------------------------------------|----------------------------|------------|-----------|-------|---|--|--|
|               |                                     | GCD No.:                   | 1          | 2         | 3     | 4 |  |  |
|               | 1                                   | Grease overflow            |            |           |       |   |  |  |
|               | 2                                   | GCD does not function      |            |           |       |   |  |  |
|               | 3                                   | 25% rule not met           |            |           |       |   |  |  |
|               | 4                                   | Inlet pipe not visible*    |            |           |       |   |  |  |
|               | 5                                   | Outlet pipe not visible*   |            |           |       |   |  |  |
|               | 6                                   | Roots intrusion            |            |           |       |   |  |  |
|               | 7                                   | Corrosion damage           |            |           |       |   |  |  |
|               | 8                                   | Broken/missing parts       |            |           |       |   |  |  |
|               |                                     | Tota                       | l Boxe     | s Che     | cked: |   |  |  |
|               | *                                   | Covered with grease        |            |           |       |   |  |  |
| Enforceme     | nt A                                | ctions:                    |            |           |       |   |  |  |
| If number of  | boxe                                | s checked is more than 0:  | Courte     | sy letter |       |   |  |  |
| If severe GCD | ) non                               | -compliance:               | Certifie   | ed letter |       |   |  |  |
|               |                                     | GCD Inspection             | Result     | S         |       |   |  |  |
|               |                                     | ☐ In Compliance            |            |           |       |   |  |  |
|               |                                     | Non-Compliance, Verbal Wa  | arning     |           |       |   |  |  |
|               |                                     | Non-Compliance, Courtesy   | Letter     |           |       |   |  |  |
|               |                                     | Severe Non-Compliance, Co  | ertified L | _etter    |       |   |  |  |
|               |                                     | Re-inspection scheduled on |            |           |       |   |  |  |



#### Fats, Oils and Grease Control Program

Department of Public Works 200 S. President Street / PO Box 17 Jackson, MS 39205

#### **Re:** Non-Compliance Warning

| control practices at your establishmed<br>Ordinance, Sections 122-177 throug<br>Management Practices (BMPs), con | FOG Control Program performed a re-inspection today of the FOG ent and again found it to be non-compliant. The City's Sewer Use gh 122-180, requires food service establishments to adopt kitchen Best inply with record keeping requirements, and install and properly ol device, which includes regular cleaning. |
|--|---|
| Your establishment will be re-inspec   | cted in seven (7) days from the date of this letter for the following:  |
| ☐ Training program implemented   | to ensure BMPs are followed.  |
| ☐ "No Grease" signs posted.  |   |
| ☐ Waste cooking oil being recycle  | ed.   |
| Dishwashing temperature not gr   | reater than 140° (70° if using a 3-sink chemical dishwashing system).   |
| 3-Sinks properly connected to g  | grease trap and screens are present in sink and floor drains.   |
| Grease trap/interceptor is install   | led properly.   |
| Grease interceptor 25% rule is f   | Followed (sediment + grease less than 25% of liquid depth).   |
| Grease trap/interceptor cleaned  | regularly and documented by maintenance log.  |
| Outdoor grease storage contained   | ers are covered with no signs of overflowing.   |
| ☐ Dumpsters and grease/oil storag  | ge containers located as far from storm drains as possible.   |
| Spill kit is provided.   |   |
| Other  |   |
| certified letter. Violations of the Sev<br>Order imposing a compliance sched                                     | issuance of a Notice of Violation of the Sewer Use Ordinance by wer Use Ordinance will result in the issuance of an Administrative lule and/or a civil penalty. If you have any questions or concerns, LuFunya Porter, FOG Control Program Manager, at 601-352-6800.  |
|  | Follow-up Inspection Date:  |
| DeWayne Evans<br>FOG Program Inspector   | Facility Name:  |
|  | Facility Address:   |
|  | Received by:  |



200 South President Street Post Office Box 17 Jackson, Mississippi 395205-0017

Chokwe A. Lumumba, Esquire Mayor of the City of Jackson

#### **CERTIFIED**

Date

FSE Name FSE Address Jackson, MS

**RE: NOTICE OF VIOLATION** 

An inspector with the City of Jackson Fats, Oils and Grease (FOG) Control Program performed an inspection of the grease control device at the above location on {insert date} and determined that it is non-compliant with the City's Sewer Use Ordinance Section 122-179. This Section requires that grease control devices be properly operated and maintained, which includes regular cleaning, that grease removed from the interceptor be disposed of properly, and that logs be properly maintained that document cleaning and maintenance of grease control devices, and that document proper disposal of grease. Our inspector discussed this violation with you at the time of the inspection. This letter is a follow-up to that inspection.

Our inspector observed the following conditions:

{description of the violation of Section 122-179 observed during the visit}

Your food service establishment and the grease control device will be re-inspected five (5) working days from date of receipt of this letter as stamped on the certified mail receipt. Failure to comply with provisions of the Sewer Use Ordinance will result in the assessment of a penalty for noncompliance.

If you have questions or require further assistance please contact April Sawyer, FOG Program Coordinator, at 601-960-2090.

Sincerely,

Charles Williams Jr., PE, PhD Director, Department of Public Works

cc: Terry Williamson, Legal Counsel, Department of Public Works

### Jackson, Mississippi Area Liquid Waste Haulers

#### **Brown Grease Disposal from Grease Traps and Grease Interceptors**

Diers Sanitation 4527 Henderson Road Jackson, MS 39272 601-940-3888

Fox Septic, LLC 3759 McGuffee Road Clinton, MS 39056 601-622-6362

Pitre's Environmental Services PO Box 720777 Byram, MS 39272 601-953-5196

Central Mississippi Sewer Service Rebel High Velocity 333 Wilmington Street Jackson, MS 39204 601-373-3736

Wastewater Control, Inc. 2056 Highway 49 South Florence, MS 39073 601-932-2455

Go Potty 5250 Galaxy Drive Jackson, MS 39206 601-709-0620

Craig's Digging Service 114 Shipp Avenue Florence, MS 39073 601-936-0759

Gotta Go 120 Highway 49 North Jackson, MS 39209 601-879-3969

AAA Septic Systems 4030 Highway 471 North Brandon, MS 39047 601-829-3444

Metro Mechanical 1385 Industrial Drive Bolton, MS 39041 601-866-9050 Hales Tank Service 29 Sylwood Place Jackson, MS 39209 601-366-4742

McLin Septic Tank Service 286 McCullough-McLin Road Florence, MS 39073 601-845-8248

Seal Digging Services, Inc. 4022 Highway 49 South Florence, MS 39073 601-845-0484

Hillard's Septic Tank and Grease 1050 Greenfield Circle Brandon, MS 39042 601-939-6666

Sheffield Rental 1255 Highway 61 South Vicksburg, MS 39180 601-301-2354

#### **Yellow Grease Disposal (Used Cooking Oil)**

Griffin Industries/ Dar Pro Solutions 1299 Prisock Rd Jackson, MS, 39272 601-372-5212 www.darpro-solutions.com

#### **Residential Used Cooking Oil Disposal**

City of Jackson Household Hazardous Waste Recycling Facility 1570 University Blvd. (corner of Terry Road and U.S. Highway 80) Drop-offs accepted Tuesdays and Thursdays 8:00 AM – 4:00 PM

#### **Section 2 – Food Service Establishment Record Keeping Requirements**

- 2.2 FSE Manager FOG Training Record
- 2.3 FSE Employee FOG Training Record
- 2.3 Grease Control Device Maintenance Record
- 2.4 Waste Hauler Manifest



#### Fats, Oils and Grease Control Program

Department of Public Works 200 S. President Street / PO Box 17 Jackson, MS 39205

### **FSE FOG Training Program**



You, the owner/manager of the Food Service Establishment (FSE), must conduct a FOG Training Program with your employees!

Your employees need to understand how the equipment and operational procedures in your FSE affect the sanitary sewer lines. When they learn which practices allow excessive FOG discharges to the sanitary sewer system and the consequences, they will understand why it is important to follow kitchen Best Management Practices (BMPs) and help avoid sanitary sewer overflows.

#### **BMPs Training**

- 1. You are required to provide initial training on kitchen BMPs to all employees in your FSE and then to all new employees, explaining:
  - Problems created by FOG discharges to the sanitary sewer system.
  - Kitchen Best Management Practices for FOG control.
  - Importance of following the kitchen BMPs procedures.
- 2. Make sure the all employees watch the FOG training video.
- 3. Go over the following points as they concern your operation:
  - What are the sources of Fats, Oils and Grease from our facility? (Examples: frying oil, butter, milk and other dairy products, soap)
  - What devices discharge to the sanitary sewer system? (Examples: pre-rinse station, sink, dishwashing machine, floor drains, toilets)
  - How can you prevent FOG from getting in the sewer system? (Examples of BMPs are: (1) scrape/dry wipe food and residue into a trash can before washing dishes and cookware; (2) use paper towels to absorb spilled oils and dispose in trash can instead of washing down the drain)
- 4. Enter name of each completed employee trained in your FSE Employee Training Record.
- 5. Place signs in the kitchen to remind employees of the need for grease control.

#### Grease Trap/Grease Interceptor Inspection & Cleaning

- 1. Train selected employees at the beginning of the program, and later as needed, how to:
  - Check if the grease trap and/or grease interceptor needs cleaning.
  - Complete the GCD Maintenance Record form.
  - Clean the grease trap OR schedule your waste hauler to pump out the grease interceptor.

#### Follow-Up and Refresher Training

- 1. Observe employees and recognize employees who follow kitchen BMPs.
- 2. Ask employees for any ideas or suggestions for improvements.
- 3. Review the FSE Employee Training Record and provide refresher training to employees quarterly.



#### **Grease Control Device Maintenance**

#### **Grease Control Devices**

Grease Interceptor – Large underground grease removal tank on sewer line outside the building.

Manual Grease Trap – Small grease removal unit in kitchen area, typically next to sink.

Automated Interior Grease Trap – Indoor mechanical grease trap with automated grease removal.

Yellow Grease Container – Receptacle for used cooking oil for removal by a recycler.

#### **Grease Control Device Inspection & Maintenance Procedure**

- 1. Open lids on GCDs and check that accumulated grease and solids do not exceed the 25% rule.
  - <u>25% Rule</u>: Depth of grease on top and depth of solids on bottom, added together, must not be more than 25% or ¼ of the total liquid depth to not impair operation of the unit. Estimate depth of each layer using a probe or suitable measuring device.
- 2. If unit contains 25% or more accumulated grease and solids the unit must be cleaned.
  - Grease Interceptor Contact waste hauling company to perform cleaning.
  - Manual Grease Trap Manually dip or remove accumulated grease and solids to a disposable container and place in trash. Refer to unit manufacturer instructions.
- 3. Check for the following:
  - Inlet and outlet pipes are visible. If either is covered by grease a cleaning must be performed. (May only apply to outdoor grease interceptor.)
  - The grease control device functions as intended. If not maintenance or repair is needed. Refer to manufacturer's instructions or contact a licensed plumber.
  - Unit is not showing severe corrosion or has broken or missing parts. If so repair or replacement is needed.

Automated Interior Grease Trap – Grease is removed continuously to a container for disposal in the trash. Perform routine maintenance per manufacturer's instructions. If unit is not functioning properly contact manufacturer or a licensed plumber.

#### Reminders

- DO NOT discharge improperly shredded garbage, animal guts or tissues, paunch manure, bones, hide, hair, fleshing, or entrails. These materials can cause blockages in the sewer.
- DO NOT discharge wastewater with temperatures in excess of 140°F to any Grease Control Device. Temperatures in excess of 140°F will dissolve grease, which will re-congeal downstream.
- DO NOT discharge caustics, acids, solvents, or other emulsifying agents. Though emulsifying agents can dissolve solidified grease, the grease can re-congeal further downstream in the sewer system. Caustics, acids, and solvents can have other harmful effects on the wastewater system.
- DO NOT use biological agents for grease remediation without permission from the City. Biological agents can disrupt the treatment process at the Wastewater Treatment Plant.

#### And finally...

- Current Employee Training Records and GCD Maintenance Records must be kept on the premises for review by City FOG Inspector together with copies of the pumping manifest from the waste hauler.
- Failure to properly maintain your GCD is a violation of City Ordinance and subject to fines.
- Discharge of grease from your facility may cause a sewer blockage and lead to shut down of your operation.

### **Grease Interceptor Cleaning Procedure**

|    | Grease Control Device: GCD#   | Tank Volu            | me: gal                         |    |
|----|---|----------------------|---------------------------------|----|
|    | ☐ Outdoor grease interceptor ☐ Indo   | or grease trap       | ☐ Yellow grease container       |    |
| 1. | . Place safety cones around grease interceptor to   | prevent pedestria    | n or vehicular encroachment.    |    |
| 2. | 2. Remove manhole covers.   |                      |                                 |    |
| 3. | 3. Place vacuum tube all the way into the intercep  | tor to suck solids f | rom the bottom.                 |    |
| 4. | <ul> <li>Vacuum water from the interceptor including al<br/>Vacuum up any remaining water and solids and</li> </ul>                                     |                      |                                 |    |
| 5. | 5. Check that baffle wall is in place and secure. In  | spect tank for any   | sign of cracks or defects.      |    |
| 6. | 6. Check that sanitary "T"s on the inlet and outlet   | compartments are     | not clogged, loose, or damaged. | •  |
| 7. | . If the interceptor has a separate sample box, o   | pen it and clean th  | e box.                          |    |
| 8. | 8. Replace manhole covers and clean up any grea   | se spills using grea | se/oil absorbent pads.          |    |
| 9. | 2. After completion of the final inspection fill out a  | GCD Maintenance      | Form.                           |    |
|    | MPORTANT: Decanting is not permitted. DECAN ruck back into the interceptor tank after it is vacuus.  GREASE INTERCEPTOR FROM KITCHEN DRAIN WATER SOLIDS |                      |                                 | he |
| Gr | Grease Interceptor Cleaning   |                      |                                 |    |
| Na | lame of Waste Hauler:   |                      | Phone:                          | _  |
| Gr | Grease Trap or Grease Interceptor Repair  |                      |                                 |    |
| Na | Name of Licensed Plumber:   |                      | Phone:                          | _  |



This form certifies the material and information reviewed with me by the City of Jackson FOG Program Inspector. Provide one copy of the signed form to the FOG Program Inspector and keep one copy on file in the FSE as confirmation of completed initial FOG Program training.

| TO BE COMPLETED BY FSE OWNER/MANAGER   |  |  |  |  |  |
|--|--|--|--|--|--|
| Your Name/Title:   |  |  |  |  |  |
| FSE Name:  |  |  |  |  |  |
| FSE Address:   |  |  |  |  |  |
| Training performed by:FOG Progra   | Date:<br>m Inspector   |  |  |  |  |
| Fact Sheets:   | Forms:   |  |  |  |  |
| <ul> <li>□ What is FOG?</li> <li>□ Permitting and Compliance Inspection</li> <li>□ Grease Trap Fact Sheet</li> <li>□ Grease Interceptor Fact Sheet</li> <li>□ FSE Best Management Practices</li> </ul> | <ul> <li>☐ FSE Inspection Form</li> <li>☐ FSE Employee Training Record</li> <li>☐ Grease Control Device Maintenance Record</li> <li>☐ Waste Hauler Manifest</li> </ul> |  |  |  |  |
| Training Video: FOG Control video availab  | ole on www.jacksonms.gov   |  |  |  |  |
| <b>FOG Control Posters:</b> ☐ FOG Control poster areas of the kitchen are available for download   |  |  |  |  |  |
| <b>Acknowledgement</b> : I certify that instruction has been given to me on the FOG Control Program and the required FOG training program for my FSE employees.  |  |  |  |  |  |
| FSE Owner/Manager Signature:   | Date:  |  |  |  |  |



This form certifies the material and information reviewed with me by the City of Jackson FOG Program Inspector. Provide one copy of the signed form to the FOG Program Inspector and keep one copy on file in the FSE as confirmation of completed initial FOG Program training.

| TO BE COMPLETED BY FSE OWNER/MANAGER  |  |  |  |  |  |
|---|--|--|--|--|--|
| Your Name/Title:  |  |  |  |  |  |
| FSE Name:   |  |  |  |  |  |
| FSE Address:  |  |  |  |  |  |
|   |  |  |  |  |  |
| Training performed by:  | Date:  |  |  |  |  |
| FOG Progr   | am Inspector   |  |  |  |  |
| Fact Sheets:  | Forms:   |  |  |  |  |
| ☐ What is FOG?  | ☐ FSE Inspection Form                                      |  |  |  |  |
| ☐ Permitting and Compliance Inspection  | ☐ FSE Employee Training Record                             |  |  |  |  |
| ☐ Grease Trap Fact Sheet  | ☐ Grease Control Device Maintenance Record                 |  |  |  |  |
| ☐ Grease Interceptor Fact Sheet   | ☐ Waste Hauler Manifest                                    |  |  |  |  |
| ☐ FSE Best Management Practices   |  |  |  |  |  |
| Training Video: ☐ FOG Control video availa  | ble on www.jacksonms.gov                                   |  |  |  |  |
|   | <u></u>  |  |  |  |  |
| <b>FOG Control Posters</b> : ☐ FOG Control posters (3) for posting on walls above sinks or other areas of the kitchen are available for download on <a href="https://www.jacksonms.gov">www.jacksonms.gov</a> |  |  |  |  |  |
|   |  |  |  |  |  |
|   |  |  |  |  |  |
| <b>Acknowledgement:</b> I certify that instruction has the required FOG training program for my FSE emp   | as been given to me on the FOG Control Program and loyees. |  |  |  |  |
| FSE Owner/Manager Signature:  | Date:  |  |  |  |  |



#### Fats, Oils and Grease Control Program

Department of Public Works 200 S. President Street / PO Box 17 Jackson, MS 39205

### **FSE Employee Training Record**



You, the owner/manager of the Food Service Establishment (FSE), must keep track of your employee training in good FOG management practices.

| Keep this record on file in the FSE as confirmation of completed employee training in kitchen Best Management Practices (BMPs) and grease control device (GCD) maintenance. |  |  |  |  |                  |
|---|--|--|--|--|------------------|
| TO BE COMPLETED BY FSE OWNER/MANAGER  |  |  |  |  |                  |
| Your Name/Title:  |  |  |  |  |                  |
| FSE Name:   |  |  |  |  |                  |
| FSE Address:  |  |  |  |  |                  |
| Employee Name   |  |  |  |  | Mgr.<br>Initials |
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|   |  |  |  |  | 1                |
| BMPS: Kitchen Best Management Practices GCDs: Grease Control Device Maintenance   |  |  |  |  |                  |



## City of Jackson FOG Program FSE Employee Training Record

|                             | Trained In: |            |                           |                    | Mgr.     |
|-----------------------------|-------------|------------|---------------------------|--------------------|----------|
| Employee Name               | BMPs        | GCDs       | Date                      | Employee Signature | Initials |
|                             | Ш           |            |                           |                    |          |
|                             |             |            |                           |                    |          |
|                             |             |            |                           |                    |          |
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|                             |             |            |                           |                    |          |
| BMPS: Kitchen Best Manageme | ent Practic | GCDs: Grea | ase Control Device Mainte | enance             |          |



#### Fats, Oils and Grease Control Program

Department of Public Works 200 S. President Street / PO Box 17 Jackson, MS 39205

#### **Grease Control Device Maintenance Record**

| GCD Type: □           | CD Type: 🗆 Outdoor grease interceptor 🗆 Indoor grease trap 🗆 Yellow grease container 🗆 Sand/Oil Interceptor 🔻 Capacity: |                                    |                               |  |                                |                               | gal or lbs                 |                      |
|-----------------------|---|------------------------------------|-------------------------------|--|--------------------------------|-------------------------------|----------------------------|----------------------|
| Date of<br>Inspection | 25%<br>Rule<br>Met?   | Cleaning<br>Performed?<br>(Y or N) | Repair<br>Needed?<br>(Y or N) | Description of Required<br>Maintenance or Repair | Pumping<br>Needed?<br>(Y or N) | Name of Licensed Waste Hauler | Volume<br>Removed<br>(gal) | Employee<br>Initials |
|                       |   |                                    |                               | _  |                                |                               |                            |                      |
|                       |   |                                    |                               |  |                                |                               |                            |                      |
|                       |   |                                    |                               |  |                                |                               |                            |                      |
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|                       |   |                                    |                               |  |                                |                               |                            |                      |

Inspect units frequently as determined by manager. Weekly inspection recommended.

25% Rule: Thickness of grease (top layer) and solids (on bottom) must not be more than 25% or ¼ total depth. If greater than 25%, unit must be cleaned (interior grease trap) or pumped (exterior grease interceptor).



#### Fats, Oils and Grease Control Program

Department of Public Works 200 S. President Street / PO Box 17 Jackson, MS 39205

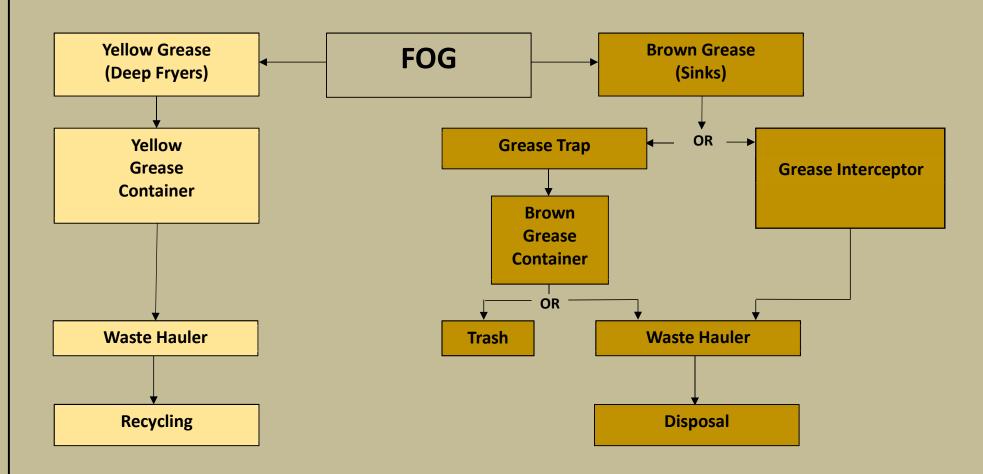
#### **Waste Hauler Manifest**

| TO BE COMPLETED BY FACILITY REPRESENTATIVE  |
|---|
| Facility Name:  |
| Facility Address:   |
| FOG Device# Serviced: Date/Time of Cleaning: Est. Vol. Removed: gal.                  |
| FOG Device Type: ☐ Grease Trap ☐ Grease Interceptor ☐ Sand/Oil Interceptor            |
| Facility Representative Name: Signature:  |
| TO BE COMPLETED BY WASTE HAULER   |
| Business Name:  |
| Street or PO Box:   |
| City: State: Zip:   |
| Driver's Name: Signature:   |
| DISPOSAL SITE   |
| Facility Name:  |
| Date/Time of Disposal: Manifest #:  |
| CITY OF JACKSON FOG CONTROL PROGRAM   |
| Date Processed: Processed by:   |
| MANIFEST DISTRIBUTION   |
| Original – Disposal Site Files Pink Copy – FSE Files Yellow Copy – Waste Hauler Files |

#### **Section 3 - Food Service Establishment Best Management Practices**

- 3.1 FOG Control and Kitchen BMPs training video This video is available for viewing or downloading from the City of Jackson website: <a href="www.jacksonms.gov">www.jacksonms.gov</a>
- 3.2 FSE Fats, Oils and Grease Flow Chart
- 3.3 Kitchen BMPs Flyer
- 3.4 FOG Control Posters
- 3.5 Mobile Food Unit Flyer
- 3.6 National Restaurant Association FOG Control BMPs

## Food Service Establishment Fats, Oils and Grease Flow Chart



Follow kitchen Best Management Practices to capture FOG and keep it out of the sewer!



## FOG Control Program Best Management Practices for FOG Control

#### **RESTAURANTS& FOOD SERVICE ESTABLISHMENTS SHOULD:**

- 1. Have proper grease control equipment installed.
- Maintain (routinely clean or pump out) grease control devices. Check interceptor regularly to make sure it meets the 25% rule and the structure is in good operating condition.
- Keep records on-site of grease control equipment pumping/cleaning and maintenance to provide inspectors.
- Train staff to implement Best Management Practices for grease.
- Keep exhaust hoods clean. Wash hood filters in sinks that flow to grease control devices





## BEST MANAGEMENT PRACTICES FOR GREASE IN THE KITCHEN:

- Post "NO GREASE" signs above sinks.
- Use food grinders as little as possible they fill up grease traps too quickly!
- · Educate and train kitchen staff about grease control.
- "Dry wipe" all pots, pans, and plates prior to dish washing to avoid build-up of grease in your sewer line.
- Use strainers in sink drains to catch food scraps and other solids; empty

#### **BEST MANAGEMENT PRACTICES FOR GREASE OUTSIDE:**

- Store grease in leak-proof containers with tight-fitting lids. DO NOT pour down sinks or drains. DO NOT pour into storm grate or on the ground. This will clog the drains and pollute streams.
- Use only containers in good condition.
- Secure containers to prevent accidental spills, vandalism, or unauthorized use.
- Conduct regular inspections of the storage area and regularly maintain the container and storage area.
- Store containers away from storm drains.



#### IN THE EVENT OF A GREASE SPILL:

- Begin cleanup immediately.
- Do not use detergents or degreasers.
- · Block or seal off nearby storm drains.
- Contact a clean-up service if the spill is unmanageable.
- Never wash leaks or spills onto nearby streets or into drains.
- Dispose of all clean-up materials in a garbage can.



## FOG Control Program MANAGING FATS, OILS AND GREASE

## DON'T...



DO NOT pour cooking residue directly into the drain.

### **DO...**



Skim, scrape or wipe food, oil and grease from dishes, pans, fryers, griddles and work areas before prewashing. Cool first.



DO NOT put food or grease down the drain - even if there is a garbage disposal.



Dispose of food waste directly into the trash.



DO NOT pour waste oil down the drain.



Collect waste oil and store for recycling.



DO NOT wash floor mats where water will run off directly into the drain.



Clean mats inside over a utility sink.

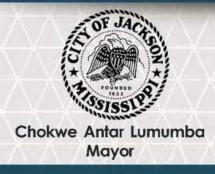
## **DO NOT** Pour Cooking Residue Directly Into The Drain!







# FATS, OILS & GREASE CLOG DRAINS!



City of Jackson Department of Public Works

Charles Williams, Jr. PE PhD







FATS, OILS & GREASE CLOG DRAINS!





City of Jackson Department of Public Works

Charles Williams, Jr. PE PhD Director







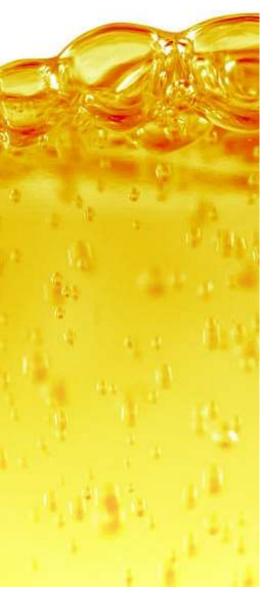
# FOOD TRUCK FATS, OILS AND GREASE CONTROL REQUIREMENTS

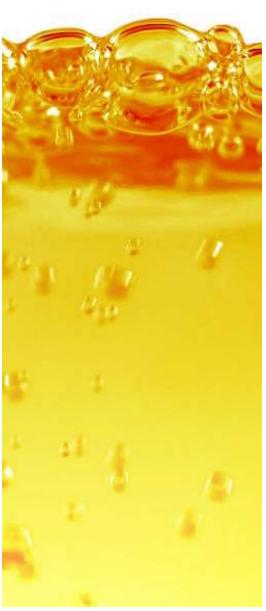
The City of Jackson has adopted a new <u>Fats, Oils and Grease Control (FOG) Ordinance</u>. All Food Service Establishments are required to comply. This includes Mobile Food Units (food trucks) operating in the City.

- Food Service Establishment (FSE): Any establishment, business or facility engaged in preparing, serving or making food available for consumption.
- Mobile Food Unit (MFU): Any mobile operation operating as an FSE, including but not limited to: full food preparation trucks and trailers, ice cream trucks, produce trucks, prepackaged hot/cold trucks (unoccupied), coffee carts, and push carts.
- Best Management Practices (BMPs) should be followed to prevent the improper disposal of fats, oils, or grease from mobile food unit operations into a city sewer or storm drain system.
- Grey water is the used water produced from hand sinks, prep sinks, dishwashing, and processing of foods. There are three ways mobile food units can properly dispose of grey water containing fats, oils, or grease: 1) Collect all grey water in a recycling container.
   2) Provide and properly operate and maintain an under sink grease trap.
   3) Hire a licensed waste hauler to remove the grey water from your holding tank.
- If cooking is being performed, used cooking oil should be collected in a container and recycled. Recycling containers may be disposed of at the City of Jackson Household Hazardous Waste Recycling Facility, 1570 University Blvd. (Terry Road and U.S. Highway 80). Drop-offs accepted Tuesdays and Thursdays 8:00 AM 4:00 PM.
- The City of Jackson will periodically inspect Mobile Food Units to ensure they are complying with the Fats, Oils & Grease Control Program. The facility's grease control practices and the adequacy of their grease control effectiveness will be assessed.

FOR MORE INFORMATION, contact the FOG Program Coordinator at 601-352-6800.









Best practices for effective grease control management

### What is **FOG**?

ats, oils and greases (FOG) are found in most restaurants — from cooking oil spilled on the floor to leftover hollandaise on customers' plates, and even airborne hamburger grease stuck to your ventilation hood. All this FOG must go somewhere and it usually ends up in your sewer pipes via the dishwasher, floor drains or the mop sink.

Pouring or washing FOG down the drain causes it to solidify, accumulate and narrow the pipe's internal opening. Eventually, FOG can completely clog the inside of the pipe, causing sewage to back up into your business, or onto the streets and into storm drains.

These sanitary sewer overflows (SSOs) can:

- Harm our rivers, lakes and streams
- Cause foul odors for customers and lead to business closures
- Release bacteria, viruses and other pathogens, spreading disease and endangering public health

SSOs are also expensive to clean up. If they occur on private property, the cost is usually borne by the property owner. You could also face civic fines and business closures if the SSO is found to be your fault.

#### FOG is ...

**BATTERS** 

BUTTER/MARGARINE

**COOKING OILS** 

**DAIRY PRODUCTS** 

**DRESSINGS** 

**FOOD SCRAPS** 

GREASE FROM COOKING

GREASE FROM VENTILATION HOODS

**GRIDDLE SCRAPINGS** 

**ICING** 

LARD

**MEAT FATS** 

SAUCES

SHORTENING







## Keeping FOG Out of Your Pipes

#### Do This First

#### **Contact your sanitation district**

(city or county municipality). They will be happy to help you avoid pitfalls and might even have free resources (e.g., posters, log books).

#### **Steps to Take**

There are three steps you must take to keep FOG in its proper place:

- 1) ensure you have the correct equipment,
- 2) service that equipment and
- 3) modify employee behavior.



#### **FOG Best Management Practices**

Follow these practices to ensure you don't clog up your pipes

#### **MUST DO**

Don't pour excess oil or grease down the drain. Pouring excess oil or grease down the drain is a big no-no. You should collect "yellow grease" in special bins for rendering by a third-party contractor.

Scrape all extra grease and greasy food scraps off plates and cookware before using pre-rinse spray valve and dishwasher. Dispose of excess grease in the trash or recycle it as part of a food waste recycling program.

Install drain screens, particularly in your sinks, to help prevent much of the grease and food particles from clogging your pipes.

Wipe up grease with a paper or cloth towel before using water and soap to clean the floor to minimize grease washing down your drains.

Only put non-greasy foods (e.g., raw vegetables) into your garbage disposal to minimize the amount of grease ending up in your drains.

Make sure your employee training materials include these kitchen BMPs, grease control device cleaning and other steps into all your employee training materials.

#### **SMART PRACTICES**

Keep these BMPs "top of mind" by requiring refresher training for your employees.

Many sewer agencies require foodservice businesses to keep log sheets documenting their continued employee training, and most require annual refresher training.

Periodically clean your lateral sewer line to prevent blockages and SSOs. Sewer agencies typically don't clean these pipes, so these lines can accumulate FOG and become blocked over time, causing an SSO. Avoid overflows by inspecting your private sewer lateral lines periodically using closed circuit television. Private plumbing contractors typically perform these inspections, which can also identify potential structural issues such as cracks, breaks, or root infiltration.

Wash out your ventilation hoods regularly to prevent excessive FOG accumulation.

Periodically clean the vents and grease pans on your roof as well. Make sure you put the leftover cleaning water and FOG in either your grease interceptor or via an offsite disposal method.

## Grease Control Devices (GCDs)

#### What You Need to Know

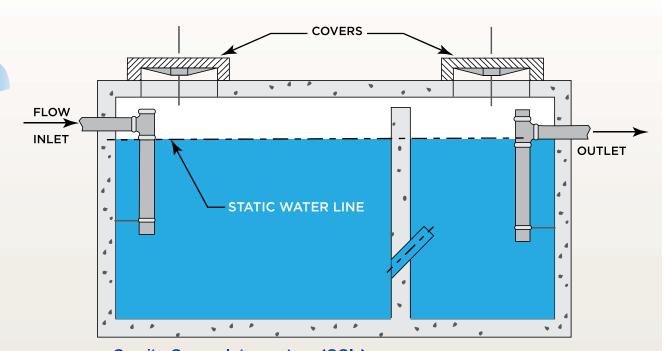
GCDs can be small or large with associated costs varying widely. Therefore, when you begin budgeting for expanding or opening a new restaurant, make sure you understand your cost liability for GCDs and plan accordingly.

#### **GCD Equipment Types**

There are many different equipment options — from large gravity grease interceptors to hydro-mechanical boxes that fit under the sink. Both the GCD equipment type and size are extremely important to how well the product functions. Also, the equipment

type could be regulated in your area so, before buying anything, contact your local permitting authority with jurisdiction over FOG discharge for details.

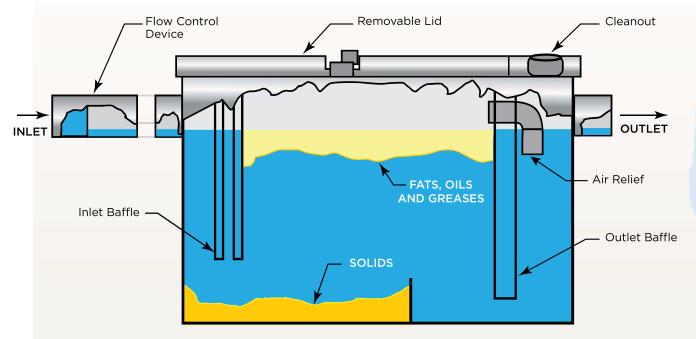
#### **Gravity Grease Interceptors (GGIs)**



#### **Gravity Grease Interceptors (GGIs)**

GGIs incorporate two or more connected compartments, with a minimum volume of 300 gallons. The GGI's design leverages its large tank size to slow water entering the device and let gravity (or FOG buoyancy) separate the FOG from the water (i.e., there are no flow control devices in pipes or baffles in the GGI). Given sufficient space and time, floating grease and settled solids separate from the kitchen wastewater and accumulate in the interceptor. That's why GGIs are usually much larger than other interceptor designs. If they are too small, the water will speed through the device, carrying the FOG with it and will accumulate "down pipe," causing a backup. The floating grease and settled solids must also be removed before they accumulate beyond a certain level to avoid clogging the plumbing or significantly reducing the available space in the interceptor.

#### Hydro-Mechanical Grease Interceptors (HGIs)



#### **Hydromechanical Grease Interceptor**

Indoor, above ground; 15-60 gallons, 20-50 GPM; 40-100 pounds of FOG storage

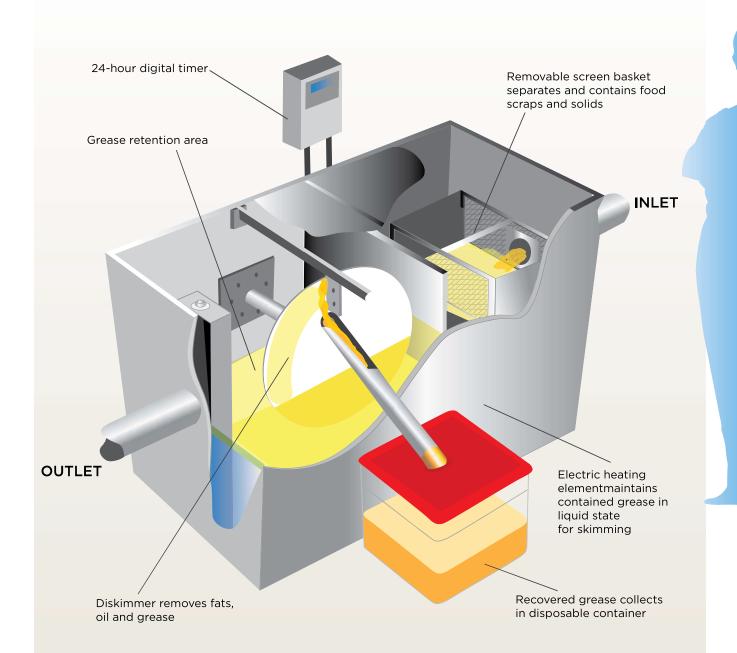
HGIs (formerly known as grease traps) are made of steel, fiberglass or polyethylene. There are three sub-types: 1) "regular," which is the basis for the other two designs and that fit under your three-compartment sink, 2) large HGIs that are a scaled up version that are typically installed outside the restaurant, and 3) HGIs that include automatic grease removal devices that skim off grease from the grey water.

#### 1 "REGULAR" HGIS

While there are many different designs, HGIs typically consist of a single compartment with baffles/screens to slow down incoming water/FOG mixture and changing the liquid's direction. This direction shift forces air into the liquid mixture, allowing FOG to rise to the top, solids to sink to the bottom, and water to pass through the unit. HGIs need flow control devices installed further up the pipes to slow water down so the baffles can do their work properly. This "mechanical separation" allows HGIs to be much smaller than GGIs. HGIs are sized based on flow rate and the pounds of FOG they can store.

#### 2 LARGE HGIS

Some sewer agencies allow larger HGIs that are typically installed outside either above or below ground, but require less excavation space due to their smaller footprint. Large HGIs are usually made of plastic or fiberglass and have internal flow control devices. These devices offer a compromise to a GGI given their larger capacity with lower installation and maintenance costs.



#### **Z** AUTOMATIC GREASE REMOVAL DEVICES (AGRDs)

AGRDs are a type of HGI that treat kitchen wastewater from food service establishments (FSEs) using gravity separation aided by vented flow control. They are also equipped with automatic grease removal features. They are normally installed indoors and connected to one to four sinks in the kitchen. AGRDs are typically made of steel and are equipped with baffles, screens and external waste containers to store FOG waste. Some are equipped with heaters, skimmers, pumps or pressure chambers to assist in the removal of the FOG.

#### Equipment Types: the Good, the Bad, and the Ugly (\$)

|  | Benefits   | Drawbacks  | Costs   |
|--|--|--|---|
| GGI  COVERS  STATIC WATER LINE                 | <ul> <li>Large FOG storage capacity</li> <li>Less maintenance</li> <li>Outside installation for easy maintenance and inspection access</li> <li>Maintenance can be performed during off hours</li> <li>Minimal contact by employees</li> </ul>   | <ul> <li>Requires more space for installation</li> <li>Can be source of odors if not maintained properly</li> <li>More expensive to install</li> <li>Higher maintenance costs per individual pumping events</li> </ul>   | <ul> <li>New construction restaurants = \$15,000 - \$25,000</li> <li>Existing restaurant retrofit = \$25,000 - \$75,000</li> <li>Maintenance = \$0.20/gallon - \$0.25/gallon</li> </ul>   |
| HGI  | <ul> <li>Requires significantly less space</li> <li>Less expensive to install</li> <li>Can be made with durable polyethylene materials</li> <li>Lower maintenance costs per event</li> <li>Can be maintained by restaurant staff</li> </ul>  | Less FOG storage capacity; more frequent maintenance Requires flow control device and additional venting Indoor installation requires space for device Potentially indoor odors if lid not sealed Typically requires health department approval Inspected or maintained during business hours  | <ul> <li>Above ground installation = \$2,500 - \$5,000</li> <li>New construction, below ground installation = \$5,000 - \$15,000</li> <li>Existing restaurant retrofit, below ground installation = \$10,000 - \$25,000</li> <li>Maintenance = Typically a base fee of \$100 - \$150 per event</li> </ul> |
| Large HGI  Just like "regular" HGI but bigger. | <ul> <li>Uses less space than a GGI</li> <li>Typically less expensive installation than a GGI</li> <li>Typically made with durable polyethylene materials</li> <li>Lower maintenance costs per event than a GGI</li> <li>Larger FOG storage space than an HGI</li> <li>Airtight lids prevents odors</li> </ul> | Less FOG storage capacity than a GGI; more frequent maintenance     Requires flow control device and additional venting     Indoor installation requires space for device     Typically requires health department approval     Restaurant staff cannot conduct maintenance  | <ul> <li>New construction restaurants = \$10,000 - \$20,000</li> <li>Existing restaurant retrofit = \$20,000 - \$50,000</li> <li>Maintenance = \$0.20/gallon - \$0.25/gallon</li> </ul>   |
| AGRD (type of HGI)                             | <ul> <li>Doesn't require significant space</li> <li>Lower maintenance costs per event</li> <li>Self-cleaning resulting in less frequent complete pumping</li> <li>Often preferred by sewer agencies over regular HGIs</li> <li>Can be maintained by restaurant staff</li> </ul>                                | <ul> <li>Requires daily, weekly and monthly maintenance</li> <li>High degree of restaurant staff training required</li> <li>No air tight seals; potential indoor odors</li> <li>More expensive than passive HGI</li> <li>Requires management of recyclable grease container</li> <li>Typically cannot be installed below ground</li> <li>Requires flow control device and additional venting</li> <li>Typically requires health department approval</li> </ul> | <ul> <li>Above ground installation = \$5,000 - \$10,000</li> <li>Existing restaurant retrofit = \$10,000 - \$15,000</li> <li>Maintenance = Typically a base fee of \$100 - \$150 per event</li> </ul>   |

#### Sizing Your Equipment

Correctly sizing your new GCD (based upon water flow rate) is incredibly important. Sizing should always be performed by a professional plumber and comply within local regulations. Many manufacturers cite that their products are often undersized, installed incorrectly, or both.

Your GCD is less effective if it is too small or improperly installed, so make sure you consider the following before buying a GCD:

- Get your building permit lined up and approved.
- Hire a licensed plumber with ample experience installing grease removal systems.
- Consider your future expansion plans and buy the right size GCD (investing a few extra dollars up front could save you thousands down the road).
- If you sell a lot of fried or greasy foods, you'll need a bigger GCD. For example, pizza restaurants produce extra FOG effluent and should have a larger grease interceptor.
- Install the GCD in an accessible location for easy access for ease of cleaning.
- Purchase and install an up-stream screening device to catch food solids before they go into the GCD.

GCDs must be cleaned and maintained regularly to function properly. Quarterly cleaning is sufficient for most conventional GGIs, while weekly cleaning or maintenance is often required for both HGIs and AGRDs, particularly if following effective kitchen management practices.

Many sewer agencies have implemented a "25 Percent Rule" to assess the maintenance condition of a GCD. The 25 Percent Rule is the measurement of the floating FOG and settled solids as a percentage of the total hydraulic water depth of the GCD. When the thickness of floating FOG and settled solids layers exceeds 25 percent of the GCD depth, the device needs maintenance. This is typically determined by the inspector or food service establishment staff using a core sampling tool to measure the contents.

#### Cleaning: How Often?

Cleaning frequency for GCDs depends on several factors, including equipment design, restaurant seating capacity, cooking techniques, and local sewer code. Typical cleaning frequency for a properly sized, well-maintained GCD is four times a year but could be more often.

#### **New Restaurants**

Most new restaurants are required to install a GCD to prevent grease from flowing into the sanitary sewer system. This applies to new restaurants that are expected to discharge grease due to their menu, preparation/cooking processes, or kitchen fixtures. Examples include restaurants that prepare significant quantities of steak, pork, chicken, fish, pasta, soup, or fried food using grills, fryers, rotisseries, woks and tilt kettles. Conversely, some new restaurants may not be required to install a GCD if they are not expected to discharge FOG due to their menu or kitchen fixtures, such as some sandwich shops, coffee shops, juice shops and other low-FOG generating operations.

#### **Existing Restaurants**

Many existing restaurants already have GCDs installed. Provided these devices are connected to the appropriate fixtures/drains, and properly installed and maintained, no other GCDs should be required in most cases. Due to new grease control requirements in many areas of the country, existing restaurants without GCDs are being required to retrofit one (or more). Some agencies may offer "grandfathering" (i.e., removing or postponing the requirement) for existing restaurants due to the potential significant cost of purchasing or retrofitting the device. However, grandfathering may not be possible when: 1) a significant remodel occurs, 2) a restaurant demonstrates nonadherence to FOG control program requirements or 3) the receiving sewer system has shown a history of grease blockages.



#### **Third-Party Cleaners**

City or county FOG control programs generally require regular cleaning and proper disposal of waste grease to stay in compliance. If you want to hire a FOG cleaning and hauling service, remember the following.

#### **How to Choose**

Choosing the right grease waste hauler for your facility can be challenging. Restaurants should interview multiple haulers prior to choosing one for their facility. Consider the following factors:

- Cost per gallon for pumping
- Ability to haul both GCD waste and yellow grease
- Flexibility in schedules and hauling times
- Ability to provide proper documentation (manifests) and respond to information requests
- Ability to quickly respond to emergency situations
- Disposal locations of hauled wastes and uses
- Biogas production
- Energy production
- Product inputs (e.g., soap)

#### **Documentation Requirements**

Proper documentation is essential when using a third-party hauling service. Sewer agencies typically require that all FOG cleaners/haulers provide your restaurant a copy of the pumping manifest prior to departing the business and that you (the restaurateur) maintain copies. Typical minimum information requirements include:

- Name of hauling company.
- Name and signature of operator performing the pump out.
- Documentation of full pump out with volume of water and FOG removed (e.g., 1,500 gallons).
- Documentation of the level of floating FOG and settled solids (to determine if volume exceeds 25 percent capacity of the grease removal equipment).
- Documentation if repairs to the grease interceptor are required.
- Identification of the facility where the hauler is planning to dispose of the waste.



#### **Odor Control**

There is no way around it: rotting grease stinks. Not only that, these septic conditions can create sulfuric acid that can corrode your GGI. Make sure you take the following steps:

- Perform frequent interceptor cleaning and maintenance, including complete removal (pumping) of all contents (clean quarterly or via 25 percent rule; more often if GCD begins to smell).
- Conduct thorough cleaning of the interceptor walls and promptly repair identified structural problems.
- Clean lateral line between the kitchen and the grease interceptor when cleaning the GCD.
- Utilize kitchen BMPs to minimize the food/ solids introduced into the sewage system.
- Use a sewage/wastewater treatment additive and confirm with your local sewer agency that the use of a treatment additive is allowed.

#### Manage Yellow Grease and Save a Buck

Yellow grease, (basically, all the fryer oil and cooking fats from your back of house NOT in a GCD) should be managed appropriately and can often be sold and recycled by a third party to make biodiesel or other products. Waste grease and oils from deep fryers, drippings from rotisseries or grills, and scrapings from griddles, should be separated and placed in specific containers for proper disposal. The restaurant contracts with a certified waste hauler to collect the yellow grease for disposal. Most yellow grease haulers sell the grease or recycle it themselves for beneficial uses such as biofuels.

#### THE PRICE OF YELLOW GREASE

VARIES FROM QUARTER TO QUARTER AND IS LISTED BY THE USDA AGRICULTURAL MARKETING SERVICE. IN JANUARY 2017, IT SOLD FOR \$0.23 PER POUND OR ABOUT \$8.05 FOR A 35 LB. JIB OF OIL. (ABOUT 40% OF THE COST OF A \$20 FRYER OIL JIB.)







#### **Section 4 - FOG Control Public Education**

- 4.1 Residential FOG Best Management Practices Flyer
- 4.2 Residential FOG Best Management Practices Poster
- 4.3 Can The Grease plastic can lid

# COOKING GREASE IS A MAJOR CAUSE OF SEWAGE BACKUPS INTO HOMES!

# WHY IS COOKING GREASE A PROBLEM?

cause rancid odors or messy, costly sewage If you pour cooking grease down your drains or coilets, it may build up, block your pipes, and backups in your home.

overflows, which are harmful to our environment. It can also clog Jackson's sewer lines. In fact, grease is a major cause of dry-weather sewer

congeals and coats pipes. When enough grease And don't believe the old saying about running hot water after pouring grease down the drain: It doesn't work. The grease eventually cools, then builds up, it can block your plumbing or Jackson's sewer lines.

# WHERE IS GREASE PRODUCED?

homes, schools, churches, food-processing plants, shopping malls, hospitals, hotels, and Restaurants, condominiums, apartment buildings, many more locations all produce grease. Grease is a by-product of cooking and is found in

- Baking goods
- Butter/margarine
- Dairy products Cooking oil
  - Food scraps
- Lard/Shortening Mayonnaise
  - Meat fats
- Salad dressings
  - Sauces/Gravy
    - Shortening

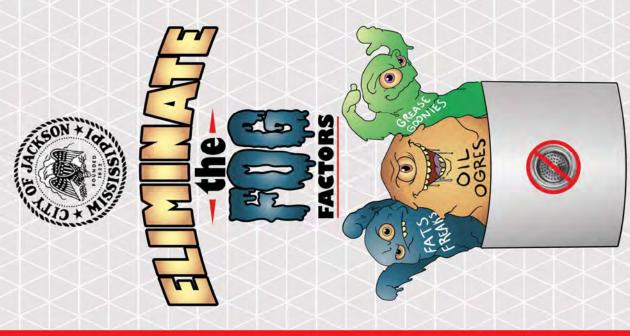
# **CAN THE GREASE!**

Pour grease into a can for disposal in the trash. You neat-resistant oven bags. Just toss the bags in the trash (after grease cools) and reuse the can. [Note: wait for it to cool slightly. Hot grease can burn can make your own grease can using any empty metal can (not plastic, which melts) and disposable, Please use caution when pouring hot grease or

Prevent grease-related sewage overflows: Keep cooking grease out of the sewer system!







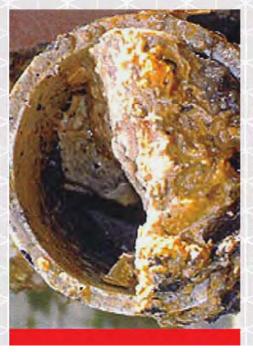
YOU can help eliminate F.O.G.!

# **Results of FOG in Sewer Lines**

When fats, oils and grease enter the sanitary sewer system, they stick to the insides of the sewer lines. Over time, the FOG buildup can block the entire line and cause sewer backups, which may result in:

- Clogged drains or toilets
- Raw sewage backing up into your home
- Raw sewage overflowing into the environment
- Expensive cleanup, repair & replacement of
  - damaged property

     Higher wastewater system operation & maintenance costs
- Unpleasant odors
- Potential public health risks



# FOR MORE INFORMATION:

CITY OF JACKSON F.O.G. COORDINATOR
DEPARTMENT OF PUBLIC WORKS
200 S, PRESIDENT STREET
JACKSON, MS 39201
(601) 960-2091
www.COJCD.ORG

To help prevent buildup, dispose of FOG properly by following the simple tips in this brochure.

# DO...



- Pour used oils and grease into a grease can or other container with absorbent material, such as a paper towel or newspaper, and dispose of it in the trash.
- Scrape food from dishes into the trash (not the garbage disposal) and wipe down greasy plates, pots and pans with a paper towel before washing. Scrape it, don't grind it.
- Use a mesh drain strainer to catch solid food scraps for disposal in the trash.
- Pour liquid food scraps (ex: sauces, milkshakes, etc.) into a container and place in the trash.
- Clean kitchen exhaust system filters routinely.
- Encourage neighbors to help keep fats, oils and grease (FOG) out of the sewer system.

#### L NOO D



- Don't pour oil or grease down any drain or toilet!
- Don't put food scraps down the drain!
- Don't pour liquid foods (dairy products, syrups, batters, gravy, etc.) down the drain!
- Don't run water over greasy dishes, pans or fryers!
- Don't use chemicals to remove grease clogs; they can damage the piping system!
- Don't rely on a garbage disposal to get rid of grease! (It grinds food but it doesn't keep grease from going down the drain.)
- Don't flush prescription or over-the-counter drugs!
- Don't flush baby or personal hygiene wipes, rags, paper towels, dental floss or disposable toilet wand heads. They can clog pipes or jam pumps, leading to costly repairs. Toilets are not trashcans!
- Don't plant trees near your home's sewer line!
   Tree roots can penetrate and crack the line. Once roots grown into the line, dense mass will trap materials and cause backups.

# DO NOT

POUR FATS, OILS OR GREASE DOWN THE DRAIN!





City of Jackson Department of Public Works

Charles Williams, Jr. PE PhD, Director Plastic can lid available from FOG Program Coordinator, Department of Public Works. Used as a means of encouraging collection and proper disposal of used kitchen grease and cooking oil.



## Section 5 - Sand/Oil Interceptors for Automotive and Industrial Facilities

- 5.1 Sand/Oil Interceptor Fact Sheet
- 5.2 Sand/Oil Interceptor Device Standards
- 5.3 Grease Control Device Maintenance Record
- 5.4 Waste Hauler Manifest

#### AUTOMOTIVE FACILITY REGULATIONS

The City of Jackson Code of Ordinances includes a Fats, Oils and Grease (FOG) Control Program to enforce proper FOG management practices to keep harmful materials out of the city sewer system. Automotive facilities, including auto repair shops, auto body shops, radiator repair shops, car washes, and fleet service facilities are required to install a sand/oil interceptor to remove oil and solids before the wastewater is discharged to the sewer system. New automotive facilities must prepare a FOG Control Plan for Department of Public Works approval.



The sand/oil interceptor must be pumped out as often as necessary to maintain the operating efficiency of the unit. All maintenance records of the sand/oil interceptor are required to be kept on site for a minimum of three years. These records will be reviewed during facility inspections completed by FOG Program inspectors.

### BEST MANAGEMENT PRACTICES (BMPs)

Automotive Repair Facilities are required to implement Best Management Practices to significantly reduce the amount of waste oil, antifreeze, and other automotive fluids that could potentially be discharged to the sewer system. Effective BMPs include:

#### **DO...**

- Wipe up any spilled fluids
- Sweep and mop service floors
- Replace harmful solvents with aqueous cleaners or degreasers
- Recycle all waste oil
- Recycle all waste anti-freeze
- Recycle all transmission fluids
- Use phosphate free soaps/cleaners
- Use self-contained solvent tank
- Maintain sand/oil interceptor
- Observe and monitor all interceptor cleanings
- Post BMPs in service areas
- Review BMPs with employees

#### DON'T...

- Dispose of oil/grease waste down the drains
- Dispose of old chemicals down the drains
- Hose down spills to a floor drain (use absorbent pads or other dry cleanup methods)
- Wait until the sand/oil interceptor is overflowing to get it cleaned
- Use a drain opening chemical to open a clogged drain (call a professional plumber to evaluate the situation)

# SAND/OIL INTERCEPTOR FACT SHEET



Reduce your costs
Reduce pollution
Help protect our urban streams!

Contract the FOG Program Coordinator If you have any questions (601) 960-2090

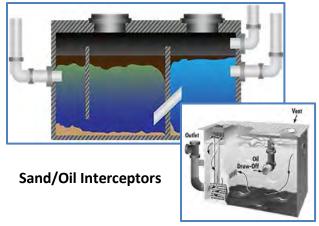


#### SAND/OIL INTERCEPTOR REQUIREMENTS

The International Plumbing Code requires interceptors to be installed in, but not limited to, the following locations:

- car washes
- motor vehicle, boat and airplane storage yards
- gasoline and diesel service stations
- repair garages
- any private or public wash rack or slab used for cleaning machinery or machine parts
- any other similar facility which may introduce sand, oil, or hydrocarbons into the sewer

All automotive facilities are required to prevent the discharge of detectable quantities of toxic organics and hydrocarbons to the sewer system.



The interceptor must comply with FOG Control Program design standards. Units are sized according to the International Plumbing Code and in accordance with requirements of the Public Works Department. The interceptor may be a baffled tank for sand/oil removal, a coalescing plate separator where sand is less of an issue, or, with approval, a single compartment tank for smaller facilities.

#### SAND/OIL INTERCEPTOR MAINTENANCE

Sand/oil interceptors must be cleaned regularly. The removal and disposal of this material should be performed by a professional pumping contractor that is licensed and trained in sand/oil interceptor cleaning. Always monitor the tank pumping and keep cleaning records on-site.

#### **Regular Cleaning Schedules**

The frequency of cleaning is dependent on the loading. The higher the concentration of waste discharged to a sand/oil interceptor, the more frequently it needs cleaning.

- Interceptor cleaning frequency will typically range from 30 days to every 12 months.
- A new unit should be cleaned at 90 days after installation to help establish the cleaning frequency.

If cleaning is needed more frequently than every 90 days, the sand/oil interceptor is possibly undersized.

#### **Disposal of Intercepted Materials**

Sand/oil and other waste matter that has been removed from the interceptor should not be introduced into any drain, sewer, storm drain or natural body of water.



#### **Re-evaluate Cleaning Schedules**

Regular cleaning at prescribed intervals is necessary to maintain interceptor efficiency. The maintenance interval should be re-evaluated on any system that has clogged, possibly the result of changes in wastewater quantity or quality. Re-evaluation of maintenance frequency is common practice for pretreatment of oil-laden or hydrocarbon impacted wastewater.

#### **Inspect Interceptor After Cleaning**

After the accumulated sand/oil and waste material are removed, thoroughly check the interceptor to make certain that the inlet, outlet and air relief vents are clear of obstructions. Backups prior to scheduled maintenance intervals indicate a clogged system, which could result in an overflow.

Also, the performance of the interceptor becomes impaired as sand/oil and other materials accumulate because of reduced retention time, resulting from less interceptor volume.

#### **Properly Sized Interceptor**

Oversizing the size of the interceptor can reduce the required cleaning frequency. The frequency of cleaning can best be determined by experience based on observation. Generally, cleaning should be done when 50% of the sand/oil retention capacity has been reached. This level can be determined by removing the inlet side cover, and using a probe, determining the depth of sand/oil build up.

#### Don't Be a Pain in the Drain

Proper cleaning and maintenance of the interceptor must be performed on a regular schedule or the interceptor becomes fouled, allowing oils, solvents, hydrocarbons, grit and debris to pass through the device and accumulate on pipe walls in the sewer system. Where installed, the owner, at his or her expense, shall maintain all interceptors to ensure continuously efficient operation at all times.



# FOG Control Program SAND/OIL INTERCEPTOR DEVICE STANDARDS

All automotive facilities, any private or public wash rack or slab used for cleaning machinery or machine parts, and any other similar facility which may introduce sand, oil, or hydrocarbons into the city sewer are required to have properly sized sand/oil interceptors.

The following must be provided with the building permit application:

- I. FOG Control Plan.
- 2. Site plan showing facility layout, drain lines, and sand/oil interceptor location.
- 3. Sand/oil interceptor sizing calculations.
- 4. Manufacturer's drawing, specifications, and performance information on the sand/oil interceptor.

At least one of the following grease control devices must be installed as approved by City:

- 1. **Two Compartment Sand/Oil Interceptor Tank** Available in various capacities from 250 to 3000 gal. If more than 3000 gal capacity is required, multiple units shall be installed.
  - Fiberglass or acid resistant coated steel sand/oil interceptor.
  - Precast concrete sand/oil interceptor.
- 2. **Coalescing Plate Separator** Acceptable alternative to conventional gravity sand/oil interceptor. Contains media to perform required separation in a smaller tank. Submit information on proposed manufacturer and model with FOG Control Plan for review.

If no calculations are furnished justifying the proposed sand/oil interceptor device size and approved by City, the unit will must be sized according to the following criteria:

#### 1. Car Washes

Sand/oil interceptors shall have the minimum volume as listed in the table below and will provide not less than a 10-minute retention time at the projected peak discharge flow rate. An effluent sampling well is required.

|                  | No. of Wash | Minimum Interceptor |  |  |  |  |  |
|------------------|-------------|---------------------|--|--|--|--|--|
| Car Wash Type    | Bays        | Volume, gals        |  |  |  |  |  |
|                  | Single Bay  | 250                 |  |  |  |  |  |
| Hand Held Spray/ | 2 Bay       | 350                 |  |  |  |  |  |
| Brush Wand       | 3 Bay       | 500                 |  |  |  |  |  |
|                  | 4 Bay       | 750                 |  |  |  |  |  |
| Automated Drive  | Single Bay  | 500                 |  |  |  |  |  |
| Through          | 2 Bay       | 1000                |  |  |  |  |  |

Wash racks must be constructed to eliminate or minimize the impact of runoff from rain/storm events. Minimum requirements are roofed structures with at least two walls and appropriate grading to prevent runoff from the wash bays entering a storm drain or the sanitary sewer.

#### 2. Automotive Repair Facilities

Any facility performing automotive servicing and repair containing a floor drain in its areas of automotive operations shall be required to design, install, and maintain a sand/oil interceptor. The interceptor shall have a minimum capacity of 50 gallons for the first 100 square feet of area to be drained plus 1 cu. ft. (7.5 gals) of volume for each additional 100 square feet of area to be drained into the interceptor. An effluent sampling well is required.

#### 3. Other Facilities

Any facility that discharges a wastewater containing more than 200 mg/L Oil and Grease will be required to install a sand/oil interceptor, unless the facility owner can demonstrate that the excess oil and grease is not floatable and cannot be effectively removed in a sand/oil interceptor. This requirement applies to all facilities that have a potential to discharge petroleum based products to the sanitary sewer such as fleet maintenance facilities and industrial operations.

#### 4. Limitations

Sand/oil interceptor sizing criteria above represents minimum standards for normal usage. Installations with heavier usage require more stringent measures. The Department of Public Works reserves the right to evaluate interceptor sizing on an individual basis for facilities with special conditions, such as highly variable flows, high levels of hydrocarbon discharge, or other special conditions.

#### **Alternate Sand/Oil Interceptor Sizing Procedure**

If the establishment desires to use an alternate procedure to size the sand/oil interceptor, it shall be sized according the following criteria.

- (1) Third party (e.g., PDI/ASME) certified device sized based on the projected flow rate, hydrocarbon and solids loading rate, proposed frequency of oil and solids removal, maximum certified oil and sand containment capacity, and certification testing effluent concentration for hydrocarbons equal to or less than the oil and grease concentration in Jackson Code of Ordinances Section 122-173.
- (2) Calculations prepared by a Mississippi Professional Engineer demonstrating that the unit effluent concentration is equal to or less than the oil and grease concentration in Jackson Code of Ordinances Section 122-173. Calculations shall include flow rate, rise and settling velocities, short-circuiting, inlet, baffle and outlet effects on velocity distribution, hydrocarbon and solids loading rate, and frequency of oil and solids removal.

#### **Prohibited Discharges**

Prohibited discharges to sand/oil interceptors: sewage; fats; grease; additives or chemicals designed to absorb, purge, consume, treat, or otherwise eliminate oils. The use of additives designed to disperse oils is prohibited unless specifically approved in writing by the City of Jackson.



#### Fats, Oils and Grease Control Program

Department of Public Works 200 S. President Street / PO Box 17 Jackson, MS 39205

#### **Grease Control Device Maintenance Record**

| GCD Type: □           | Outdoo              | or grease int                      | erceptor                      | $\square$ Indoor grease trap $\square$ Yellow    | grease cor                     | ntainer 🗆 Sand | /Oil Interceptor Capacity:    |                            | gal or lbs           |
|-----------------------|---------------------|------------------------------------|-------------------------------|--|--------------------------------|----------------|-------------------------------|----------------------------|----------------------|
| Date of<br>Inspection | 25%<br>Rule<br>Met? | Cleaning<br>Performed?<br>(Y or N) | Repair<br>Needed?<br>(Y or N) | Description of Required<br>Maintenance or Repair | Pumping<br>Needed?<br>(Y or N) |                | Name of Licensed Waste Hauler | Volume<br>Removed<br>(gal) | Employee<br>Initials |
|                       |                     |                                    |                               | _  |                                |                |                               |                            |                      |
|                       |                     |                                    |                               |  |                                |                |                               |                            |                      |
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|                       |                     |                                    |                               |  |                                |                |                               |                            |                      |
|                       |                     |                                    |                               |  |                                |                |                               |                            |                      |

Inspect units frequently as determined by manager. Weekly inspection recommended.

25% Rule: Thickness of grease (top layer) and solids (on bottom) must not be more than 25% or ¼ total depth. If greater than 25%, unit must be cleaned (interior grease trap) or pumped (exterior grease interceptor).



#### Fats, Oils and Grease Control Program

Department of Public Works 200 S. President Street / PO Box 17 Jackson, MS 39205

#### **Waste Hauler Manifest**

| TO BE COMPLETED BY FACILITY REPRESENTATIVE  |  |  |  |  |  |
|---|--|--|--|--|--|
| Facility Name:  |  |  |  |  |  |
| Facility Address:   |  |  |  |  |  |
| FOG Device# Serviced: Date/Time of Cleaning: Est. Vol. Removed: gal.                  |  |  |  |  |  |
| FOG Device Type: □ Grease Trap □ Grease Interceptor □ Sand/Oil Interceptor            |  |  |  |  |  |
| Facility Representative Name: Signature:  |  |  |  |  |  |
| TO BE COMPLETED BY WASTE HAULER   |  |  |  |  |  |
| Business Name:  |  |  |  |  |  |
| Street or PO Box:   |  |  |  |  |  |
| City: State: Zip:   |  |  |  |  |  |
| Driver's Name: Signature:   |  |  |  |  |  |
| DISPOSAL SITE   |  |  |  |  |  |
| Facility Name:  |  |  |  |  |  |
| Date/Time of Disposal: Manifest #:  |  |  |  |  |  |
| CITY OF JACKSON FOG CONTROL PROGRAM   |  |  |  |  |  |
| Date Processed: Processed by:   |  |  |  |  |  |
| MANIFEST DISTRIBUTION   |  |  |  |  |  |
| Original – Disposal Site Files Pink Copy – FSE Files Yellow Copy – Waste Hauler Files |  |  |  |  |  |

#### Section 6 - FOG Control Program Sewer Use Ordinance

#### REGULAR MEETING OF THE CITY COUNCIL TUESDAY, FEBRUARY 27, 2018 6:00 P.M.

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ORDINANCE AMENDING ARTICLE II. SEWAGE DISPOSAL STANDARDS TO CREATE A FATS, OILS AND GREASE (FOG) CONTROL PROGRAM AND FOR OTHER RELATED PURPOSES.

WHEREAS, the City of Jackson entered into a Consent Decree with the State of Mississippi and the United States of America on March 1, 2013 in the case entitled, United States of America and the State of Mississippi vs. The City of Jackson, Mississippi, No. 3\_12-cv-790 TSL-MTP, United States District Court for the Southern District of Mississippi; and

WHEREAS, the Consent Decree requires the City to implement certain Capacity, Management, Operations, and Maintenance program, including a fats, oils, and grease (FOG) control program; and

WHEREAS, the City of Jackson submitted a proposed FOG Control Program to the United States Environmental Protection Administration, Region IV, for review and approve, which included a commitment to revise the City's ordinances to implement the FOG Control Program and enforce compliance with it.

#### NOW, THEREFORE, BE IT ORDAINED BY THE CITY COUNCIL OF THE CITY OF JACKSON, MISSISSIPPI:

**SECTION 1.** Section 122-76. – Definitions is repealed and replaced in its entirety as follows:

Section 122-76. - Definitions.

The following words, terms and phrases, when used in this article, shall have the meanings ascribed to them in this section, except where the context clearly indicates a different meaning:

Approving authority means the city engineering section of the utilities division of the public works department or the director of public works or other designated official of the city or his duly authorized deputy, agent or representative.

BOD (biochemical oxygen demand) means the quantity of oxygen utilized in the biochemical oxidation of organic matter under standard laboratory procedure in five days at 20 degrees Celsius, expressed in milligrams per liter.

Building drain means that part of the lowest horizontal piping of a drainage system which receives the discharge from soil, waste, and other drainage pipes inside the walls of the building and conveys it to the building sewer, beginning five feet outside the inner face of the building wall.

Building sewer means the extension from the building drain to the public sewer or other place of disposal.

Chlorine requirement means the amount of chlorine in milligrams per liter, which must be added to sewage to produce a residual chlorine content or to meet the requirements of some other objective, in accordance with procedures set forth in the definition for the term "standard methods."

FOG stands for fats, oils and grease.

Food Service Establishment (FSE) means any establishment, business, or facility engaged in preparing, serving, or making food available for consumption.

Garbage means solid wastes from the domestic and commercial preparation, cooking, and dispensing of food, and from the handling, storage, and sale of produce.

Garbage Grinder means a device which shreds or grinds up solid or semisolid waste materials into smaller portions for discharge into the sanitary sewer collection system.

Gravity Grease Interceptor is a large tank or device so constructed as to separate and trap or hold fats, oil and grease substances from entering the sanitary sewer collection system. Grease interceptors are typically located outside FSEs due to their size.

*Grease* is a material composed primarily of fats, oil and grease from animal or vegetable sources. The term fats, oil and grease may be referred to as grease or types of grease and does not include petroleum-based products.

- · Brown grease- are fats, oils and grease that is discharged to the grease control equipment.
- Yellow grease- are fats, oils and grease, usually spent oil from deep frying, that has not been in contact with or contaminated from other sources (water, wastewater, solid wastes, etc.) and can be recycled.

Grease Control Device (GCD) is a device for separating and retaining grease and solids prior to wastewater existing the food service establishment (FSE) and entering the sanitary collection system. These devices include hydro mechanical grease interceptors and gravity grease interceptors.

Hydrogen ion concentration. See the definition for pH.

Automated interior grease trap is a hydromechanical grease control interceptor designed to separate, trap or hold fats, oil, and grease substances to prevent their entry into the sanitary collection system and provide automated, continuous removal of the collected FOG into a container. These devices are usually installed inside, and under, or in close proximity to, sinks or other fixtures likely to discharge grease.

Manual interior grease trap is a small manually-cleaned interior grease interceptor with a flow control device installed on sinks in smaller FSEs where no frying occurs.

*Industrial wastes* means the liquid wastes from industrial manufacturing processes, trade, or business as distinct from sanitary sewage.

Natural outlet means any outlet into a watercourse, pond, ditch, lake or other body of surface water or groundwater.

pH means the logarithm of the reciprocal of the weight of hydrogen ions in grams, per liter of solution.

Properly shredded garbage means the wastes from the preparation, cooking, and dispensing of foods that have been shredded to such a degree that all particles will be carried freely under the flow conditions normally prevailing in public sewers, with no particle greater than one-half inch in any dimension.

Public sewer means a sewer in which all owners of abutting properties have equal rights, and is controlled by public authority.

Regulatory agency means the state department of environmental quality, office of pollution control.

Sand/Oil Interceptor means a device to separate oil and sand from wastewater produced from car washes; motor vehicle, airplane, and boat storage yards; gasoline and diesel service stations; repair garages; any private or public wash rack used for cleaning machinery or

machine parts; or any other similar facility which may introduce sand, oil, or hydrocarbons into the city sewer.

Sanitary sewer means a sewer which carries sewage and to which stormwater, surface water, and groundwater are not intentionally admitted.

Service charge means the basic assessment levied on all users of the public sewer system whose wastes do not exceed in strength the concentration values established as representative of normal sewage.

Sewage means a combination of the water-carried wastes from residences, business buildings, institutions, and industrial establishments, together with such groundwater, surface water, and stormwater as may be present.

Sewage treatment plant means any arrangement of devices and structures used for treating sewage.

Sewer means a pipe or conduit for carrying sewage.

Sewerage works means all facilities for collecting, pumping, treating, and disposing of sewage.

Slug means any discharge of water, sewage, or industrial waste which in concentration of any given constituent or in quantity of flow exceeds for any period of duration longer than 15 minutes more than five times the average 24-hour concentration or flows during normal operation.

Standard methods means the examination and analytical procedures set forth in the most recent edition of "Standard Methods for the Examination of Water, Sewage, and Industrial Wastes," published jointly by the American Public Health Association, the American Waterworks Association and the Water Pollution Control Federation.

Storm drain (sometimes termed "storm sewer") means a sewer which carries stormwater and surface water and drainage, but excludes sewage and industrial wastes, other than unpolluted cooling water.

Surcharge means the assessment in addition to the service charge which is levied on those persons whose wastes are greater in strength than the concentration values established as representative of normal sewage.

Suspended solids means solids that either float on the surface of, or are in suspension in water, sewage, or other liquids, and which are removable by laboratory filtering.

Waste Hauler is one who transfers waste from the site of a customer to an approved site for disposal or treatment. Waste Haulers are required to be certified as a Pumper by the Mississippi State Department of Health.

Watercourse means a channel in which a flow of water occurs, either continuously or intermittently.

**SECTION 2.** Section 122-172. – Interceptors required for certain liquid wastes is repealed in its entirety and replaced with the following:

Sec. 122-172. - Interceptors required for sand and oil.

(a) Sand/oil interceptors shall be provided when required the City of Jackson FOG Control Program Manual. Such interceptors shall be maintained according to the FOG Control Program Manual. (b) The failure to install a Sand/oil interceptor when such is required by the FOG Control Program Manual or the failure to properly maintain the interceptor according to the FOG Control Program Manual shall constitute a violation of this Article.

**SECTION 3.** Section 122-173. – Parameters for maximum concentrations of discharges is repealed in its entirety and replaced with the following:

Section 122-173. - Parameters for maximum concentrations of discharges.

(a) The limits for following materials shall be based on any applicable EPA categorical industrial guidelines, receiving stream water quality standards, criteria established by the Mississippi Department of Environmental Quality, biological treatment process threshold inhibition levels, and sludge quality criteria:

| Arsenic  |   |      | - | - |   |     | - | - | - |   | - |   |   |   |     |   |      |
|----------|---|------|---|---|---|-----|---|---|---|---|---|---|---|---|-----|---|------|
| Barium   |   | -    |   |   | - |     |   |   | - |   |   |   |   |   |     |   |      |
| Boron    |   | -    |   | - | - | + - | - | - | - | - | - | - |   |   | - ' |   | 7    |
| Cadmium  |   | -    |   | - | - | -   | - | - | + | + | - | 1 | - |   |     |   | A    |
| Chromium |   | -    |   |   | - | -   |   | - | - |   | + | - | - | - |     | - |      |
| Copper   |   | -    |   | - |   | -   |   | - | - | - | - | 7 | - | - | -   | - |      |
| Cyanide  |   |      | - | - | - | -   | - | - | - | 1 | - | 1 |   | - |     | - |      |
| Lead     |   | -    | - |   | - | -   |   | - | - | - | - | - | - | - | -   | - |      |
| Manganes | е | - 17 | - |   |   | -   | - |   | - | - | - | - | - | ā | -   | + | - 13 |
| Mercury  |   |      | - | - | - | -   | - |   | - |   | * |   | - | - |     | * |      |
| Nickel   |   |      | _ |   | - | ı   |   |   | - | - | - | - | - | - | -   | - |      |
| Selenium |   |      | - |   | - | -   | - |   | - | - | - | - | - | - | -   | - |      |
| Silver   |   |      | - | - | - | -   | - |   | - | - | - | - | - | - | -   | - |      |
| Zinc     |   |      | - | - |   |     | _ |   |   |   |   |   | - | - | -   | - |      |

- (b) As a condition for authorization to dispose of or continue to dispose of industrial wastes through the municipal system, the industrial applicant for a sewer permit shall provide the city with information describing wastewater constituents and characteristics, and the type of activity and quantity of production with the application. Any industrial discharger shall provide such information at the request of the Director of the Department of Public Works or his/her designee.
- (c) Any nonconventional material that is specific to an industrial process that results in a discharge of BOD, SS and TKN may be increased by written approval of the Director of the Department of Public Works or his/her designee for limited periods of time.

**SECTION 4.** There is hereby enacted the following new ordinances that are to be codified as indicated:

#### DIVISION 5. - FATS, OILS AND GREASE CONTROL PROGRAM

Sec. 122-177. - FOG Control Plan and Fees

- (a) FSEs lawfully in existence as of the date of this ordinance are not required to install a grease control device unless and until a FOG discharge to the City's sanitary collection system from the FSE has caused a blockage or system problem, as documented by the Director of the Department of Public Works. If such a blockage or system problem occurs, the FSE shall be required to submit a FOG Control Plan and install a grease control device.
- (b) All new FSEs, FSEs undergoing a remodel requiring a building permit under the City Building Code, or FSEs undergoing a change of ownership shall have an approved FOG Control Plan.
- (c) New FSEs and FSE remodels shall submit and have approved by the Director a separate FOG Control Plan describing the FSE characteristics and the method of FOG control prior to the issuance of the certificate of occupancy by the Building Official. The Plan shall conform to the requirements and standards of the City of Jackson FOG Control Program Manual, as approved by the Director of the Department of Public Works.
- (d) For FSE changes in ownership, a FOG Control Plan shall be submitted and approved within fourteen (14) calendar days of the issuance of the business license. If the FSE has no existing GCD, a GCD meeting the requirements and standards of the City of Jackson FOG Control Program Manual shall be installed.
- (c) FOG Control Plans shall be on forms provided by the City. FOG Control Plans shall be verified and shall conform to the requirements and standards of the City of Jackson FOG Control Program Manual.
- (f) FSEs submitting a FOG Control Plan for review and approval shall pay a fee of 200.
- (g) All FSEs shall pay an annual fee of 150.

Sec. 122-178. - Grease Control Devices Sizing and Standards

All Grease Control Devices installed shall conform to the requirements and standards contained in the City of Jackson FOG Control Program Manual.

Sec. 122-179. - Food Service Establishment (FSE) Recordkeeping and Onsite Management

- (a) Cleaning and pumping-
  - (1) Manual interior grease traps shall be cleaned as often as necessary to prevent grease from entering the City's sanitary collection system, but at least once per month. Automated interior grease traps shall be maintained at all times to prevent grease from entering the City's sanitary collection system. Failure to perform cleaning and maintenance of a grease trap as required may result in a notice of violation and the issuance of an Administrative Order.
  - (2) Gravity grease interceptors shall be cleaned out at least every three (3) months, or as often as necessary to prevent grease from entering the City's sanitary collection system. Measurement of solids volume greater than or equal to 25% of the interceptor volume shall be considered non-compliance with the City's FOG Control Program.

#### (b) Disposal of Grease Waste-

- (1) Waste removed from grease interceptors must be disposed of with solid waste or garbage in a sealed container, unless cleaned and hauled by a Waste Hauler.
- (2) All waste removed from grease interceptors must be disposed of at a facility approved to receive such wastes and shall not be returned to any private or public portion of the sanitary sewer collection system.
- (3) All pumpage from gravity grease interceptors must be tracked by a manifest which confirms the pumping, hauling and disposal of the waste. The customer or FSE must obtain a manifest from the waste hauler with signatures and copies must be kept for record purposes.

#### (c) Maintenance Log-

- A grease control device/equipment cleaning record maintenance log and pumping manifest indicating cleaning or pumping for the previous 24 months shall be maintained by each facility required to install grease control device/equipment.
- (2) Maintenance logs for grease control devices/equipment shall include the date and time of cleaning, the company and/or person conducting the cleaning, the volume pumped, and the disposal site for the gravity grease interceptor pumpage.

#### Sec. 122-180. - FSE inspections and entry

- (a) Authorized personnel of the City shall have the right to enter upon all properties subject to this chapter, at any reasonable time and without prior notification, for the purpose of inspection, observation, measurement, sampling, testing or record review.
- (b) Each FSE shall be subject to inspection on an as-needed basis to ensure each facility is complying with the FOG Control Program requirements, but shall be inspected at least every two (2) years.

#### DIVISION 6. ENVIRONMENTAL ENFORCEMENT

Sec. 122-181. - Environmental violations and penalties.

#### a. Definitions.

- (1) Administrative Penalties. An administrative penalty is a monetary penalty assessed by the Director or his designee for violations of Article II. Sewage Disposal Standards, including, but not limited to, the FOG Program, violations of the Stormwater Quality Protection Ordinance, Sections 122-301 through 122-307, and Chapter 106, Solid Waste, Sections 106-1 through 106-220. Administrative penalties are to be used as an escalated enforcement action and are not related to a specific cost born by the Director or his designee. Instead, the amount of the penalty should recapture any economic benefit gained by noncompliance and/or deter future violations. An Administrative Order is to be used to assess an administrative penalty.
- (2) Administrative Orders (AO). Administrative Orders are to be issued by the Director or the Director's designee. Administrative Orders are enforcement documents that direct users to undertake and/or to cease specified activities. Administrative Orders are to be used as the first formal response to significant noncompliance, and may incorporate compliance schedules, administrative penalties, assessments for costs incurred during investigation and/or enforcement, attorney's fees, assessments for damages and termination of service. The Department has adopted three (3) general types of AOs: Compliance Orders, Cease and Desist Orders, and Agreed Orders:

- (a) Compliance Order. A Compliance Order directs the User to achieve or restore compliance by a specified date and is the primary means of assessing penalties and costs. The Compliance Order will document the noncompliance and state required actions to be accomplished by specific dates and is issued by the Director or his designee.
- (b) Cease and Desist Order. A Cease and Desist Order directs the noncompliant User to cease illegal or unauthorized discharge immediately or to terminate discharge altogether. To preserve the usefulness of this order in emergency situations, penalties should not be assessed in this document. A Cease and Desist Order will be used in situations where the discharge is causing interference, pass through, environmental harm, or otherwise creating an emergency situation. The order may be issued immediately upon discovery of an emergency situation or following a hearing. In an emergency, the order to cease and desist may be given by telephone with a subsequent written order to be served by the Director or his designee before the close of business on the next working day. If the User fails to comply with the order, the Director or his designee may take independent action to halt the discharge.
- (c) Agreed Order. The Agreed Order is an agreement between the Department and the User. The Agreed Order normally contains three elements: (1) compliance schedules with specific milestone dates; (2) stipulated penalties, damages, and/or remedial actions; and (3) signature by the Director and the User representative. An Agreed Order is appropriate when the User assumes the responsibility for its noncompliance and is willing (in good faith) to correct the causes
- (3) Noncompliance Notification (NCN). The Noncompliance Notification (NCN) is a notification to the user that a practice, an action, or wastewater discharge is noncompliant with Department regulations or policies. A NCN informs the user that an action is required of the user within a specified time period designated by the Director, or their designee, or the noncompliance will require the Director to escalate enforcement action against the user.
- (4) Notice of Violation (NOV). The Notice of Violation (NOV) is an official communication from the Director to the noncompliant user that informs the user that a violation has occurred. The NOV is issued for relatively minor or infrequent violations of standards and requirements, and should be issued within five (5) working days of the identification of a violation. A NOV does not contain assessment of penalties or cost recovery. The NOV provides the regulated entity with an opportunity to correct the noncompliance on its own initiative rather than according to a schedule of actions determined by the Director. The NOV documents the initial attempts of the Department to resolve the noncompliance. Authenticated copies of NOV's may serve as evidence in judicial proceedings.
- (5) **Schedule of Compliance.** A Schedule of Compliance is a detailed list of steps to be taken by a noncompliant user whereby compliance with all pertinent regulations will be achieved. This schedule shall contain increments of progress in the form of dates for the commencement and completion of major events leading to the construction and operation of additional GCD or other facilities required for the regulated entity to meet the applicable standards and requirements (e.g. hiring an engineer, completing preliminary plans, executing contracts for components, commencing construction, etc.).

b. Penalty Assessment. The City of Jackson has categorized the various types of violations of the FOG Control Program, and assigned a penalty range to each category. Penalty categories are determined by using the Enforcement Response Guide, which is included in the FOG Control Program Manual. All penalty assessments will be approved and signed by the Director or the Director's designee. Penalty amounts determined are considered to be an economic deterrent to the noncompliance being addressed. Penalty ranges have been designed to recover any economic benefit gained by the violation through noncompliance. Violations of other environmental ordinances subject to this Division shall be assessed consistent with the penalties provided in those ordinances. The ranges of penalties for any violation of the requirements and standards for the FOG Control Program shall be as follows:

| CATEGORY<br>0 | = | NO PENALTY                   |
|---------------|---|------------------------------|
| CATEGORY<br>1 | = | \$200.00 TO \$500.00         |
| CATEGORY<br>2 | = | \$500.00 TO \$1,000.00       |
| CATEGORY<br>3 | = | \$1,000.00 TO<br>\$10,000.00 |
| CATEGORY<br>4 | = | DIRECT LEGAL<br>ACTION       |

Assessments for damages or destruction of the facilities of the POTW, and any penalties, costs, and attorney's fees incurred by the City of Jackson as the result of the illegal activity, as well as the expenses involved in enforcement, are not part of this penalty assessment procedure.

Sec. 122-182. – Emergency suspension of services

The City may suspend water or wastewater service when such suspension is necessary, and without prior notice, when in the opinion of the Director of the Department of Public Works, one of the following situations occurs with respect to the FOG Control Program:

- Three notices of violation of the FOG Control Program have occurred within a 12-month period,
- (2) When there is imminent or substantial endangerment to the health or welfare of persons or the environment,
- (3) When stoppages or sanitary sewer overflows have occurred, or excessive maintenance has to be performed to prevent stoppages or overflows in the sanitary sewer collection system,
- (4) When interference occurs with the operation and/or maintenance of the wastewater treatment facility, or
- (5) Any condition that causes the City to violate any condition of its NPDES permits, agreed orders, or consent decree.

Sec. 122-183. - Appeal and waiver provisions:

- (a) Any person aggrieved by an action of the Director of the Department of Public Works or the rejection any FOG Control Plan, suspending or revoking any Plan, or any other final action imposing affirmative or negative obligations on such user, or imposing an Administrative Penalty under this chapter may appeal such decision to the Administrative Law Judge. No notice of violation of this chapter, no requirement only for information or data concerning a regulated activity and no action of the Director not imposing specific affirmative or negative obligations or an Administrative Penalty shall be appealable. The Administrative Law Judge must receive the written appeal within 15 calendar days of the date of the Director's action, identifying the action appealed from, the relevant facts, and any information that such person requests the Administrative Law Judge to consider. The Administrative Law Judge may in his or her discretion either informally decide the appeal without a hearing or may hold a hearing at which such person may present his or her arguments and evidence. At any hearing held pursuant this paragraph testimony and evidence will be under oath. The Administrative Law Judge shall endeavor to affirm, modify or rescind the action in writing within 30 calendar days of the appeal or any hearing held hereunder.
- (b) If an FSE is reasonably unable to install an outside gravity grease interceptor, the FSE must install a properly sized automated interior grease trap or traps. The FSE may submit a written request for a variance to this requirement to the Director of the Department of Public Works or his or her designee for consideration. All requests shall contain all such information as the Director may require. The Director may grant a variance on a case-by-case basis after consideration. No such variance shall authorize the creation or maintenance of a nuisance or any danger to public health or safety. No variance granted by the Director shall be construed to authorize any activity in violation of state or any federal pollution control regulation or requirement.

Sec. 122-184. – Creation of the Administrative Law Judge for Appeals from Environmental Ordinance Violations:

- (a) The position of Administrative Law Judge for appeals from Administrative Orders and Administrative Penalties is hereby created.
- (b) The Mayor shall appoint one or more of the currently serving Municipal Judges to serve as Administrative Law Judges to hear appeals from Administrative Orders and Administrative Penalties issued under the authority of Article II. Sewage Disposal Standards, including, but not limited to, the FOG Program; violations of the Stormwater Quality Protection Ordinance, Sections 122-301 through 122-307; and Chapter 106, Solid Waste, Sections 106-1 through 106-220.
- (c) The decision of the Administrative Law Judge shall constitute final action by the City. which may be appealed by bill of exceptions to a court of competent jurisdiction.

SECTION 5. This ordinance shall be effective March 1, 2018.

Vice President Priester moved adoption; President Tillman seconded.

Yeas- Banks, Foote, Lindsay, Priester and Tillman.

Nays- Stamps and Stokes.

Absent- None.

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#### REGULAR MEETING OF THE CITY COUNCIL TUESDAY, APRIL 14, 2020 10:00 A.M.

#### ORDINANCE AMENDING SECTION 122-177 (a) OF THE JACKSON CODE OF ORDINANCES-DIVISION 5. FATS, OILS AND GREASE CONTROL PROGRAM.

**WHEREAS,** the City of Jackson entered into a Consent Decree with the State of Mississippi and the United States of America on March 1, 2013 in the case entitled, United States of America and the State of Mississippi vs. The City of Jackson, Mississippi, No. 3:12-cv-790 TSL-MTP, United States District Court for the Southern District of Mississippi; and

**WHEREAS**, the Consent Decree requires the City to implement certain Capacity, Management, Operations, and Maintenance program, including a fats, oils, and grease (FOG) control program; and

**WHEREAS,** the City of Jackson submitted a proposed FOG Control Program to the United States Environmental Protection Administration, Region IV, for review and approval, which included a commitment to revise the City's ordinances to implement the FOG Control Program and enforce compliance with it; and

**WHEREAS**, the City initially adopted this Ordinance with a grandfather provision that exempted Food Service Establishments (FSE) existing at the time of its enactment unless their discharge of fats, oils, and grease cause a sanitary sewer overflow or problems in the sewer collection system; and

**WHEREAS,** the United State Environmental Protection Agency has requested that the City make certain amendments to the original ordinance to place a sunset provision on the grandfather clause, but indicated it would not grant pre-approval to such an amendment; and

WHEREAS, the City placed a sunset date on the grandfather clause of June 30, 2023; and

**WHEREAS,** the United States Environmental Protection Agency reviewed the amendment to the grandfather clause and expressed that it would require a significantly shorter sunset date to be considered to comply with its requirements for the City.

#### NOW, THEREFORE, BE IT ORDAINED BY THE CITY COUNCIL OF THE CITY OF JACKSON, MISSISSIPPI:

**SECTION 1.** Section 122-177 (a) is amended as follows: DIVISION 5. - FATS, OILS AND GREASE CONTROL PROGRAM

Sec. 122-177. - FOG Control Plan and Fees

(a) FSEs lawfully in existence as of the date of this ordinance are not shall be required to install a grease control device on or before February 28, 2021. However, unless and until if a FOG discharge to the City's sanitary collection system from the such a lawfully existing FSE has caused causes or significantly contributes to a blockage or system problem, as documented by the Director of the Department of Public Works. If such a blockage or system problem occurs such FSE shall be required to submit a FOG Control Plan and install a grease control device. Such a lawfully existing FSE shall submit their FOG Control Plan and install their grease control device within 30 days of notice from the Director of the Department of Public Works.

**SECTION 2.** This ordinance shall be effective thirty days after enactment and following publication.

Council Member Tillman moved adoption; President Lindsay seconded.

Yeas- Foote, Lindsay, Priester, Stamps and Tillman.

Nays- Banks.

Absent- Stokes.

#### **Section 7 - Enforcement Response Guide**

The Enforcement Response Guide showing the various types of penalty categories for violations of the FOG Control Program, as set forth in the Sewer Use Ordinance, is provided below.

# City of Jackson Fats, Oils and Grease Control Program Enforcement Response Guide

|    | Incident   | Violation<br>Category<br>Penalty Level | Action Taken   |
|----|--|--|--|
| 1. | Failure of new facility, or an existing facility that upgrades their facility, to notify City, or submit FOG Control Plan.       | 0                                      | Issue Notice of Non-Compliance (NCN) and require FOG Control Plan.                                   |
| 2. | Failure to install Grease Control Device/Equipment   |  |  |
|    | A. Initial Notification — Notification in writing by City of no treatment system.  | 0                                      | NCN detailing violation and requiring correction within 30 days.                                     |
|    | B. Second Notification — Failure to comply with NCN.   | 2                                      | Notice of Violation (NOV) requiring compliance within 30 additional days. Penalties may be assessed. |
|    | C. Third Notification — Failure to comply with NOV.  | 3                                      | Significant Noncompliance. May be subject to daily penalties.  |
| 3. | Grease Control Device structural failure (baffle wall collapsed, walls deteriorated, tank leaking, infiltration/inflow in tank). |  |  |
|    | A. Initial Notification.   | 0                                      | NCN detailing violation and requiring correction within 30 days.                                     |
|    | B. Second Notification — Failure to comply with NCN.   | 2                                      | NOV requiring compliance within 30 additional days. Penalties may be assessed.                       |
|    | C. Third Notification — Failure to comply with NOV.  | 3                                      | Significant Noncompliance. May be subject to daily penalties.  |

|    | Constant De to /Fortunal and  |   |  |
|----|---|---|--|
| 4. | Grease Control Device/Equipment not maintained (pumped or cleaned) as required.   |   |  |
|    | maintained (pumped or cleaned) as required.                                       |   |  |
|    | A. 1 incident within 24-month period  | 0 | NCN detailing noncompliance and requiring correction within 5 days.                                  |
|    | B. 2 incidents within 24-month period   | 1 | NOV requiring compliance within 5 additional days. Penalties may be assessed.                        |
|    | C. 3 incidents within 24-month period   | 2 | 2 <sup>nd</sup> NOV requiring compliance<br>within 5 additional days.<br>Penalties may be assessed.  |
|    | D. 4 incidents within 24-month period   | 3 | Significant Noncompliance. Penalties may be assessed.  |
| 5. | Failure to respond to any notification letter within 30 days.                     |   | Escalation of Enforcement  |
| 6. | No record of grease control device/equipment maintenance or cleaning at facility. |   |  |
|    | A. 1 incident within 24-month period  | 0 | NCN detailing noncompliance and requiring correction within 30 days.                                 |
|    | B. 2 incidents within 24-month period   | 1 | NOV requiring compliance within 30 additional days. Penalties may be assessed.                       |
|    | C. 3 incidents within 24-month period   | 2 | 2 <sup>nd</sup> NOV requiring compliance<br>within 30 additional days.<br>Penalties may be assessed. |
|    | D. 4 incidents within 24-month period   | 3 | Significant Noncompliance; Penalties may be assessed.  |
|    |   |   |  |

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#### Enforcement Response Guide

| 7. Failure to allow access for City personnel adequately assess grease control device/equipment.   | Significant Noncompliance; Penalties may be assessed. |
|--|---|
| 8. Safety hazard at grease control device/equipment area (i.e. missing mar cover, manhole cover damaged or not material of suitable strength). | Requires immediate correction.                        |
| 9. Facility using additives or chemicals that emulsify or otherwise cause FOG to be discharged to City of Jackson sewer systems.               | Significant Noncompliance.                            |

3 April 2018