City of Waterford

Fats, Oils, and Grease Control Manual

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The City of Waterford Public Works Department
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LIST OF ACRONYMS

BMP	Best Management Practices
CSA	Compliance Schedule Agreement
EPA	Environment Protection Agency
FOG	Fats, Oils, and Grease
FSE	Food Service Establishment
GI	Grease Interceptor
O&G	Oils and Grease (a.k.a. fats, oils, and grease)
SSO	Sanitary Sewer Overspill (a.k.a. sewer overflows, sewer spills)
SWRCB	California State Water Resource Control Board
RWQCB	Regional Water Quality Control Board
UPC	Uniform Plumbing Code

DEFINITION OF TERMS

1. *"Best Management Practices":* schedules of activities, prohibitions of practices, maintenance procedures and other management practices to prevent or reduce the introduction of FOG to the sewer facilities.

2. *"Director":* the Director of the Department of Public Works.

3. *"Discharger":* any person who discharges or causes a discharge of wastewater directly or indirectly to the sewer facilities. Discharger shall have the same meaning as User.

4. *"Fats, Oils, and Grease ("FOG")":* any substance, such as a vegetable, animal or other product that is used in, or is a by product of, the cooking or food preparation process, and that turns or may turn viscous or solidifies with a change in temperature or other conditions.

5. *"FOG Control Program":* the FOG Control Program required by and developed pursuant to Section (c)(12)(viii) of the Sewer WDRs.

6. *"FOG Discharge Manual":* the "Fats, Oils and Grease Discharge Manual", setting forth BMPs for FSE's, as approved by the Director.

7. *"FOG Wastewater Discharge Permit" or "Discharge Permit":* a permit issued by the City subject to the requirements and conditions established by the City authorizing the Permittee or discharger to discharge wastewater into the City's facilities or into sewer facilities or which ultimately discharge into such a facility.

8. *"Food Grinder":* any device installed in the plumbing of a facility or sewage system for the purpose of grinding food waste or food preparation by products for the purpose of disposing it in the sewer system.

9. *"Food Service Establishment ("FSE")":* Facilities defined in California Uniform Retail Food Facility Law (CURFFL) Health & Safety Code § 113785, and any commercial or public entity within the boundaries of the City, operating in a permanently constructed structure such as a room, building, or place, or portion thereof, maintained, used, or operated for the purpose of storing, preparing, serving, or manufacturing, packaging, or otherwise handling food for sale to other entities, or for consumption by the public, its members or employees, and which has any process or device that uses or produces FOG, or grease vapors, steam, fumes, smoke or odors that are required to be removed by a Type I or Type II hood, as defined in CURFFL. A limited food preparation establishment is not considered a FSE when engaged only in reheating, hot holding or assembly of ready to eat food products and as a result, there is no wastewater discharge containing a significant amount of FOG. A limited food preparation establishment does not include any operation that changes the form, flavor, or consistency of food.

10. *"Grab Sample":* a sample taken from a waste stream on a one-time basis without regard to the flow in the waste stream and without consideration of time.

11. *"Grease Control Device":* any grease interceptor, grease trap or other mechanism, device, or process, which attaches to, or is applied to, wastewater plumbing fixtures and lines, the purpose of which is to trap or collect or treat FOG prior to it being discharged into the sewer system. A grease control device may also include any other proven method to reduce FOG subject to the approval of the Director.

12. *"Grease Disposal Mitigation Fee":* a fee charged to an Owner/Operator of a FSE, as provided in this Chapter, when there are physical limitations to the property that make the installation of the usual and customary grease interceptor or grease control device for the FSE under consideration impossible.

13. *"Grease Interceptor":* a multi-compartment device that is constructed in different sizes and is generally required to be located, according to the California Plumbing Code, underground between a FSE and the connection to the sewer system. These devices primarily use gravity to separate FOG from the wastewater as it moves from one compartment to the next.

14. *"Grease Trap":* a grease control device that is used to serve individual fixtures and have limited effect and should only be used in those cases where the use of a grease interceptor or other grease control device is determined to be impossible.

15. *"Inspector":* a person authorized by the City to inspect any existing or proposed wastewater generation, conveyance, processing, and disposal facilities.

16. *"Interference":* any discharge which, alone or in conjunction with discharges from other sources, inhibits or disrupts the City's sewer system, treatment processes or operations; or is a cause of violation of the City's NPDES or Waste Discharge Requirements.

17. *"Major Operational Change":* a physical change or operational change causing generation of the amount of FOG that exceed the current amount of FOG discharge to the sewer system by the FSE in an amount that alone or collectively causes or create a potential for SSOs to occur.

18. *"New Construction":* any structure planned or under construction for which a sewer connection permit has not been issued.

19. *"Permittee":* a person who has received a discharge permit to discharge wastewater into the City's sewer facilities subject to the requirements and conditions established by the City.

20. *"Public Agency":* the State of California and/or any city, county, special district, other local governmental authority or public body of or within this State.

21. *"Public Sewer":* a sewer owned and operated by the City, or other local Public Agency, which is tributary to the City's sewer facilities.

22. *"Regulatory Agency":* regulatory agency or regulatory agencies shall mean those agencies having regulatory jurisdiction over the operations of the city, including, but not limited to:

A. United States Environmental Protection Agency, Region IX, San Francisco and Washington, DC (EPA).

B. California State Water Resources Control Board (SWRCB).

C. California Regional Water Quality Control Board, Central Valley Region (CRWQCB).

D. San Joaquin Valley Unified Air Pollution Control District (SJVUAPCD)

E. California Department of Health Services (DOHS).

F. Any Public Agency.

23. *"Sewage":* wastewater.

24. *"Sewer Facilities or System ":* any and all facilities used for collecting, conveying, pumping, treating, and disposing of wastewater and sludge operated by the City, including the Public Sewer.

25. *"Sewer Lateral":* a building sewer as defined in the latest edition of the California Plumbing Code. It is the wastewater connection between the building's wastewater facilities and a public sewer system.

26. *"Sewer WDRs":* the "General Waste Discharge Requirements for Sewer Collection" and any successor permit to such WDRs.

27. *"Sludge":* any solid, semi-solid or liquid decant, subnate or supernate from a manufacturing process, utility service, or pretreatment facility.

28. *"User":* any person who discharges or causes a discharge of wastewater directly or indirectly to a public sewer system. User shall mean the same as Discharger.

29. *"Waste":* sewage and any and all other waste substances, liquid, solid, gaseous or radioactive, associated with human habitation or of human or animal nature, including such wastes placed within containers of whatever nature prior to and for the purpose of disposal.

30. *"Wastewater":* the liquid and water-carried wastes of the community and all constituents thereof, whether treated or untreated, discharged into or permitted to enter a public sewer.

31. *"Wastewater Constituents and Characteristics":* the individual chemical, physical, bacteriological, and other parameters, including volume and flow rate and such other parameters that serve to define, classify or measure the quality and quantity of wastewater.

32. *"Water Minimization Practices":* plans or programs intended to reduce or eliminate discharges to the sewer system or to conserve water, including, but not limited to, product substitutions, housekeeping practices, inventory control, employee education, and other steps as necessary to minimize wastewater produced.

FORWARD

The purpose of the FOG Discharge Manual is to facilitate the maximum beneficial public use of the City's sanitary sewer collection system while preventing blockages of sewer lines resulting from discharges of FOG to the system, and to specify appropriate FOG discharge requirements for FSE's discharging into the City's sewer system to protect the public health and safety. The sections of this manual shall apply to the direct or indirect discharge of all wastewater or waste containing FOG into City's sanitary sewer collection system.

In order to manage and control, in a cost-effective manner, the discharge of FOG into the City's sanitary sewer collection system to the maximum extent practicable, it is also essential to establish a FOG program for the disposal of FOG and other insoluble waste discharges from FSE's into the City's sewer system. Compliance requirements shall also be made to allow the City to meet applicable policies at the Federal and State level.

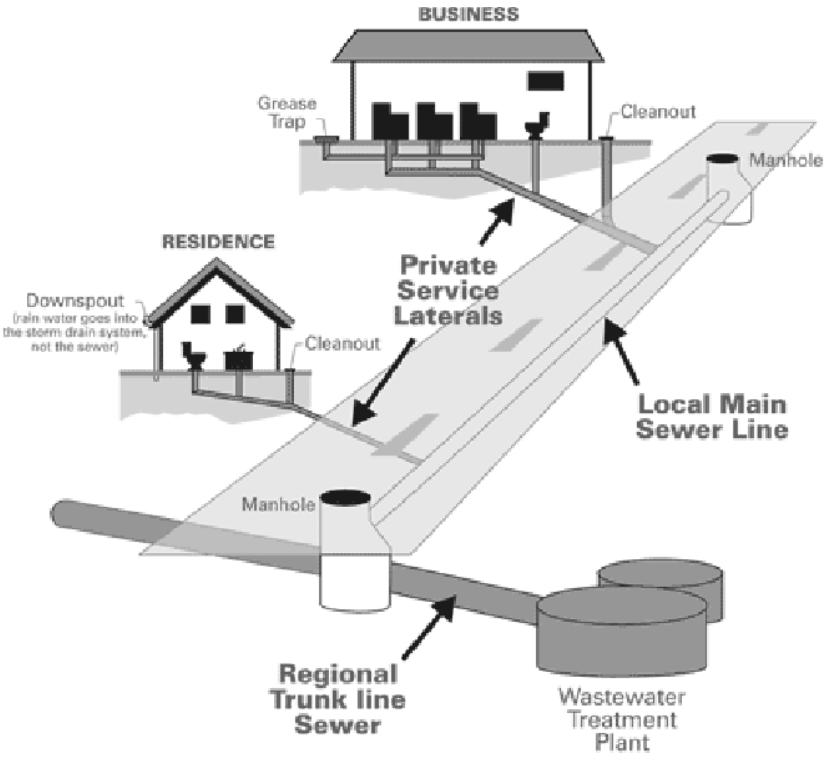
This manual shall also establish quantity and quality standards on all wastewater and/or waste discharges containing FOG, which may alone or collectively cause or contribute to FOG accumulation in the sewer facilities causing or potentially causing or contributing to the occurrence of SSOs.

What is FOG? Where does it come from?

“FOG” refers to fats, oils and grease, which are commonly found in such things as meats, sauces, gravy, dressings, deep-fried foods, baked goods, cheeses, butter and others. Residential users and many different businesses generate FOG wastes by processing or serving food, including; eating and drinking establishments, caterers, hospitals, nursing homes, day care centers, schools and grocery stores.

What's the problem with FOG?

Grease is often washed into the plumbing system, usually through the kitchen sink. Grease sticks to the insides of sewer pipes (both on your property and in the streets) and over time, the grease can build up and block the entire pipe.



Typical sewer system diagram

When sewer pipelines become blocked with grease, sewage flows out of maintenance (manholes) holes and into the storm drains. The water in storm drains flows into the river channels and eventually makes its way into the ocean. Sewer overflows pose a threat to public health, adversely affect aquatic life, and are expensive to clean up.

Why do food facilities need to know about FOG?

Cities are required to develop and implement a FOG Control Program. The program will require restaurants and food preparation facilities to follow but not be limited to implementing kitchen BMPs, consider installing a grease interceptor, develop a grease control plan, produce waste-hauling records, and/or share the costs incurred by the City to clean-out blockages in the sewer line.

How is FOG monitored? How is it enforced?

The City of Waterford maintains a record of maps of the entire sewer collection system in the city and occasionally conducts visual inspections to identity blockages caused by FOG wastes. The City of Waterford uses the information to identify the sources that are contributing to the sewer blockages, and can initiate enforcement actions against businesses to insure compliance with the State and City laws. As mentioned previously, physical damage can occur when sewer overflows of raw sewage backs up into a residence or business, as a result of sewer pipes blocked by FOG wastes. When the City of Waterford initiates enforcement actions for sewer system blockages, those responsible can be liable for:

- Physical/monetary damages caused to others
- Costs incurred by City of Waterford to respond to the blockage
- Fines and penalties

How to report Sewage Spills

Any persons or businesses affected by a sewer collection system blockage or overflow can contact City of Waterford at 209-874-2328 to file a complaint. Contact the Contracted Answering Service after hours to report spills.

Codes, Fines, and Contact Information

Allowing sewage to discharge to a gutter or storm drain may subject FSE's to penalties and/or out-of-pocket costs to reimburse cities or public agencies for clean-up efforts. In addition, FSE's are subject to additional fines and fees for certain violations related to FSE inspections and compliance with the City of Waterford Fog Program. Here are the fees, pertinent codes, possible fines, and agency contact information that apply.

City of Waterford Department of Public Works
(209) 874-4094
City of Waterford Municipal Code, Chapter 7.12

- "No FSE shall discharge or cause to be discharged into the sewer system FOG that exceeds a concentration level adopted by a Regulatory Agency or that may accumulate and/or cause or contribute to blockages in the sewer system or at the sewer system lateral which connects the FSE to the sewer system."

City of Waterford Fees

- FOG Permit Fee (Yearly) $70.00
- Grease Disposal Mitigation Fee (Yearly) $500.00
- Re-Inspection Fee (as a result of a violation) $35.00
- Appeal Fee $50.00

City of Waterford Fines

Minor Violations 7.12.280 (B) W.M.C.	**1st Offense**	**2nd Offense**	**3rd Offense**	**4th Offense**
Failure to produce/submit records	$50	$100	$150	$300
Inspection hindrance (equipment related)	$50	$100	$150	$300
Failure to maintain on site training/maintenance records	$50	$100	$150	$300
Failure to comply with FOG Control Manual	$50	$100	$150	$300

Intermediate Violations 7.12.280 (B) W.M.C.	1st Offense	2nd Offense	3rd Offense	4th Offense
Failure to maintain/clean GCD (pumping)	$150	$300	$500	$1,000
Failure to maintain necessary GCD equipment	$150	$300	$500	$1,000
Tampering, rendering inoperable GCD	$150	$300	$500	$1,000
Unlawful disposal of FOG into collection system	$150	$300	$500	$1,000
Inspection hindrance – inspector (physical/verbal)	$150	$300	$500	$1,000

Major Violations 7.12.320 (B) W.M.C.	Per Occurrence
Source of sewer blockage (minimum)	$500
Source of sanitary sewer overflow (SSO) minimum	$1,000
False Statements, falsification of records/records/plans	$1,000

Stanislaus County Department of Environmental Health
(209) 525-6700
California Health and Safety Code, Sections 5410-5416

- No person shall discharge raw or treated sewage or other waste in a manner that results in contamination, pollution, or a nuisance.
- Any person who causes or permits a sewage discharge to any state waters:
  - Must immediately notify the local health agency of the discharge.
  - Shall reimburse the local health agency for services that protect • the public's health and safety (water-contact receiving waters).
  - Who fails to provide the required notice to the local health agency is guilty of a misdemeanor and shall be punished by a fine (between $500–$1, 000) and/or imprisonment for less than one year.

Central Valley Regional Water Quality Control Board
(916) 464-3291

- Requires the prevention, mitigation, response to and reporting of sewage spills.

California Office of Emergency Services
(800) 852-7550
California Water Code, Article 4, Chapter 4, Sections 13268-13271
California Code of Regulations, Title 23, Division 3, Chapter 9.2, Article 2, Sections 2250- 2260

- Any person who causes or permits sewage in excess of 1,000 gallons to be discharged to state waters shall immediately notify the Office of Emergency Services.
- Any person who fails to provide the notice required by this section is guilty of a misdemeanor and shall be punished by a fine (less than $20,000) and/or imprisonment for not more than one year.

Stanislaus County Agency Responsibilities

- City Sewer/Public Works Departments— Responsible for protecting city property and streets, the local storm drain system, sewage collection system and other public areas.
- Stanislaus County Department of Environmental Health— Responsible for protecting public health by closing ocean/bay waters and may close food-service businesses if a spill poses a threat to public health.
- Regional Water Quality Control Boards— Responsible for protecting State waters.

SECTION II: BASIC REQUIREMENTS OF THE FOG PROGRAM

Kitchen Best Management Practices

This manual provides guidance and recommendations for all FSE's provided wastewater services by the City of Waterford to conform to BMPs to control FOG wastes. BMPs are practices, procedures, and maintenance activities performed by FSE's to reduce the FOG in the Wastewater discharge. BMPs are described in greater detail in the section of this manual titled "Kitchen Best Management Practices." FSE's causing or contributing to wastewater system blockages will be required to conform to BMPs.

The legal authority for requiring conformance to BMPs is contained in City Code § 7.12.060.

Record Keeping and Reporting Requirement

This manual provides a sample record-keeping report that FSE's shall use to document cleaning and inspection of grease control devices. Examples of this report are contained in the Appendix of this manual. FSE's will be required to file such reports. If there are multiple establishments discharging to an obstructed pipeline it will be assumed that those establishments not following BMPs, contributed to the sanitary sewer overflow.

The legal authority for requiring FSE's to complete and submit a report is contained in City Code § 7.12.220.

Compliance Schedule Agreement (CSA)

FSE's may be required to enter into a compliance service agreement. Criteria to require FSE's to enter into a CSA may include, but are not necessarily limited to, conditions in the wastewater collection line serving the FSE's; the degree of conformance to BMPs by the FSE; and the compliance history of the FSE at that location or other locations (has the establishment caused or contributed to wastewater system blockages). A CSA would include, but not be limited to include: BMPs used by the establishment (e.g., procedures to prevent discharges of waste fat, oils and grease, waste FOG handling, storage, and disposal procedures); a description of the FSE operation; a description of the location and size of any Grease Interceptors and Grease Traps present; a description of how the Grease Interceptor or Grease Trap will be maintained (cleaned), including frequency of cleaning; and a description of how the FSE will comply with reporting requirements.

The legal authority for requiring FSE's to enter into a CSA is contained in City Code § 7.12.290.

Grease Interceptors

There are Uniform Plumbing Code requirements and Standards and Specifications for FSE's to install Grease Interceptors and Grease Traps to reduce FOG in the Wastewater discharges. These requirements are discussed in the section of this manual titled "Grease Interceptor."

The criteria for requiring the installation of a grease interceptor at an existing FSE include frequency of noncompliance, the severity of the noncompliance (damages/complaints), and good faith efforts of the user to follow BMPs to control FOG. **Refer to the section under "Variances and Waivers" and "Permit Requirements" for more details.**

The legal authority to require the installation of a grease interceptor by FSE's is contained in City Code § 7.12.070

FOG Wastewater Discharge Permit

Any FSE proposing to discharge wastewater containing FOG into the City's sewer system is required to obtain a FOG Wastewater Discharge Permit from the City when applying for or renewing its annual business license. Compliance will be required before the permit is issued. The City can refuse to issue a certificate of occupancy for any new construction or occupancy unless a FSE has complied with the ordinance (§ 7.12.120 C).

SECTION III: KITCHEN BEST MANAGEMENT PRACTICES

Description and Applicability

BMPs are procedures and practices that reduce the discharge of FOG to the building drain system and to the wastewater system. BMPs can be implemented effectively in FSE's. Existing establishments shall use BMPs to control FOG in the discharge and to prevent obstructions to the flow in sewer pipes.

Food Service Establishments (FSE)

The following BMPs are provided to assist FSE's with development of procedures and/or practices to reduce the amount of FOG in their wastewater discharge. Implementation of BMPs has the added benefit of reducing FOG and solids accumulation in Grease Traps and Grease Interceptors, thereby reducing the maintenance needs and costs of these control devices. These efforts can also minimize the likelihood that an establishment will cause a Wastewater System blockage that results in a backup into their facility or their neighbors' homes or businesses, a release to the environment, and/or an enforcement action. Implementation of BMPs can also help reduce a FSE's maintenance needs and costs for building Service Line cleaning.

Because of the variety of establishments that generate FOG, every BMP described in this manual may not apply to every establishment. It is recommended that FSE operators identify the FOG sources at their establishment and adopt BMPs to fit the establishment's needs. Operators are encouraged to contact the City's FOG Control Program Specialist (209-874-2328), if assistance with BMPs selection is desired.

Employee Training and Awareness

The success of a FSE's BMPs program is largely dependent upon employees. To promote effective employee implementation:

- Train employees on the BMPs that have been adopted for their establishment. All FSE's should instruct employees not to pour FOG down the drain and not to use the sinks to dispose of food scraps.
- Use the Public Education Materials and opportunities described in this manual
- Post "No Grease" signs above sinks and on the front of dishwashers. Signs should be written in the language(s) that is commonly spoken by employees.

Garbage Disposals and Drain Screening

Excluding food particles from the Wastewater System can eliminate a large amount of FOG from a FSE's discharge. To practice this:

- Disconnect or minimize the use of garbage disposals and use "dry" clean-up methods (described below). Operators can reduce FOG discharge by up

to 50 percent by disconnecting their garbage disposals and scraping food into the trash.

- Retain or install a fine meshed screen (1/8-inch and 3/16-inch screen openings are recommended) in the drain of each kitchen, mop, and hand sink. Clean drain screens frequently by placing the collected material in the garbage.

All FSE's are required to remove all food grinders when: (i) major operational changes take place; or (ii) any construction requiring a building permit for remodeling of the FSE valued at $500 or more. City Code § 7.12.050.

Dry Clean up

Remove food waste with "dry" methods such as scraping, wiping, or sweeping before using "wet" methods that use water. Wet methods typically wash the water and waste materials into the drains where it eventually collects on the interior walls of drainage pipes. To practice dry clean-up:

- Use rubber scrapers to remove food particles, fats, oils, and grease from cookware, utensils, chafing dishes, and serving ware. Then place the removed food particles and FOG in the garbage.
- Use paper towels to wipe down all work areas.
- Use food grade paper to soak up oils and grease under fryer baskets.

Spill Prevention and Clean-up

Preventing spills reduces the amount of waste on food preparation and serving areas that will require clean up. In addition, a dry workplace is safer for employees in avoiding slips, trips, and falls. For spill prevention:

- Empty containers, before they are full, to avoid spills.
- Use a cover when transporting spillable materials, particularly liquid wastes containing fats, oils, and grease.
- Provide employees with proper tools (e.g., ladles, ample containers, etc.) to transport materials without spilling.

Practice effective spill containment and clean up. Spills of dry ingredients should be swept- up or vacuumed to prevent washing them into sinks or floor drains. For FOG spills:

- Block off all sinks and floor drains near the spill.
- Cover the spill with absorbent material (e.g., sand, saw dust, kitty litter, salt, paper towels, etc.).
- Remove spilled material and place it in the garbage.
- Use wet clean-up methods only to remove trace residues.

FSE's that use large amounts of cooking fats (e.g., deep fat fryers) should develop and post their spill response procedure and maintain spill containment and absorbent supplies.

Pavement and Floor Cleaning

- Keep parking lot, drive through, and dumpster areas clean and remove accumulated debris. Use dry methods for spill cleanup: such as sweeping instead of washing; the use of rags, cat litter or another type of absorbent; place trash and solid waste into dumpsters. If you mop up a spill, dispose of mop/wash water in indoor janitorial/mop sinks.
- Do not hose down pavement or any outside area to the storm drain. Use a BASMAA certified surface cleaner to wash sidewalks, drive-through and parking lots. Your employees and your contractor must use BMPs to prevent wash water from flowing to the storm drain system.
- Never pour or sweep wastewater from restaurant floors out the back door, or into a gutter, storm drain, or creek. Dispose of mop/wash water in indoor janitorial/mop sinks or toilets.
- Improper handling and disposal that creates a discharge to a storm drain is illegal. Both the company and individuals responsible are subject to civil and criminal prosecution.

Dishwashing and Equipment Cleaning

Proper dishwashing and cleaning methods can reduce the entry of solids and FOG into the Wastewater System. These methods include:

- Use disposable paper products, rather than dishware, to minimize or eliminate dishwashing.
- Pre-washing dishes and cookware with hot water and no soap, prior to use of the dishwasher or three-compartment sink, can reduce the discharge of FOG discharge by 25 percent. Pre-wash sinks used for this purpose must be connected to a Grease Trap.
- Prior to washing deep fat fryers, use a rubber spatula to squeegee down the sides, while grease and oils are still warm, and then wipe the fryer with paper towels. Dispose of the paper towels in the garbage.
- Before washing grill and roaster/broiler drip pans, empty their contents into a waste grease container and then wipe them with paper towels. Dispose of the paper towels in the garbage.
- Pour all liquid grease and oils from pots and pans into a waste grease container that is stored at the pot-washing sink, and then scrape out the solidified grease, if present.
- Capture accumulated oils, during the cleaning of stoves and ventilation/exhaust hoods, and dispose of it in the garbage, after absorbing all free liquid.
- Clean floor mats, grease filters, grills, garbage cans and other restaurant equipment in a janitorial/mop sink, inside floor drain, or other designated wash area that flows to the sanitary sewer system. Talk to your local

sanitary sewer agency for requirements. Equipment cleaning wash water shall not flow to the storm drain system.

- If your restaurant uses a contractor to clean floor mats, exhaust hoods, or any other equipment, check to be sure that they are not allowing wash water to flow to the storm drain system. The restaurant is responsible for contractor actions.
- Check roof top exhaust fans and flumes at least weekly. Place an oil collection tray under rooftop exhaust fan shrouds to collect cooking oil and grease and empty the shrouds weekly.
- Do not clean equipment in food preparation sinks.
- Improper handling and disposal that creates a discharge to a storm drain is illegal. Both the company and individuals responsible are subject to civil and criminal prosecution.

Recycling

Think of oils and grease as a valuable commodity. When using deep fat fryers or any process that requires or produces large amounts of plant or animal byproducts, collect the oils and fats. Recycle the oils and fats through one of the area's recycling companies. This is the preferred method of disposal for FSE's that produce any volume of food waste. To practice recycling:

- Never dispose of fryer-vat, waste oils and fats down the drain, as this material is usually clean enough to be recycled.
- Collect and store fryer-vat waste in a rendering tank. Most recycling companies will provide outside receptacles for storage until pickup. Some companies will offer services free-of-charge, and others will give a rebate on the materials collected.

Beneficial Use of Food Wastes

Food wastes can be put too beneficial use, rather than simply discarding them. To do this:

- Contact your local health department to approve the use of food waste.

Grease Traps

For indoor Grease Traps to be effective, the units must be properly sized, constructed, and installed in a location to provide easy access for cleaning and an adequate retention time for settling and accumulation of the FOG. If the units are too close to the FOG discharge and/or do not have enough volume to allow accumulation of the FOG, the emulsified oils will pass through the unit without being captured. In addition:

- It is recommended that FSE's inspect indoor Grease Traps every month. These devices are less effective if the grease occupies greater than 25 percent of the holding capacity. If the grease occupies greater than 25 percent of the trap's holding capacity, the FSE should perform a full cleaning of the Grease Trap (removing all liquids and solids and scraping

the walls). A monthly, full cleaning of Grease Traps is recommended. If less than 75 percent of the trap capacity remains, the trap should be cleaned more often than once per month.

- Confirm that Grease Traps contain their internal baffles and inlet piping flow restrictors/air relief during every inspection and cleaning. These components aid in grease removal by reducing turbulence and increasing holding time within the trap.
- It is required that FSE's maintain a record that documents the cleaning activities for indoor Grease Traps. Records should include the name of employee who performed the cleaning, date/time of cleaning, amount of grease removed, and the disposal location for the grease. An example of a form that could be used to maintain such records is contained in the Appendix of this manual, titled "Maintenance Report for Grease Trap".
- Do not pour cooking oil or grease into sinks or floor drains, or into a parking lot, storm drain or street.
- Dispose or recycle cooking oil and grease through a licensed waste grease hauler or licensed grease recycler. Search for grease haulers and recyclers under "tallow" in the Yellow Pages.
- Service oil/grease interceptors at least monthly. For an oil/grease interceptor to function properly no more than 1/3 of the depth of the interceptor should be a floating grease layer and no more than 1/4 of the depth should be sediment on the bottom of the interceptor.
- Under-sink grease traps should be serviced at least weekly, more often if the grease trap is more than 50% full.
- Practice dry clean up. Use scrapers to remove food wastes from serving ware, pots, pans, grills, and cooking surfaces prior to cleaning them with water. Dispose of food waste in a trash receptacle, send to an animal feed company, or donate edible foodstuffs to a food donation bank.
- Use food grade paper to soak up oil and grease under fryer baskets. Dispose of soaked paper in a trash receptacle.
- Improper handling and disposal that creates a discharge to a storm drain is illegal. Both the company and individuals responsible are subject to civil and criminal prosecution.

Building Drains and Services Maintenance

City Code requires proper maintenance of building drains and sanitary service lines. FOG and debris accumulation in these plumbing structures can cause or contribute to sanitary sewer backups and overflows. To reduce these accumulations:

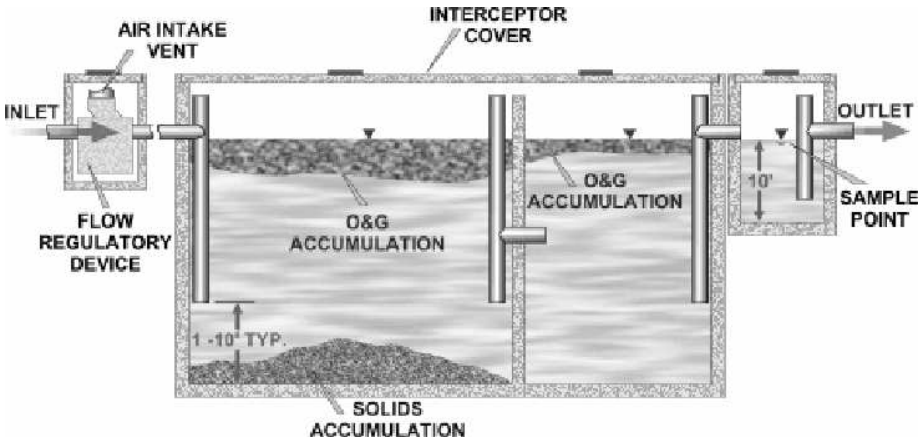
- It is recommended that FSE's have their building drains and service lines professionally cleaned at least once per year.

Waste Disposal

- Periodically inspect for leaky dumpsters and compactors. If dumpsters are leaking, call the leasing company to repair or replace dumpsters.
- Cover dumpsters and other waste containers to prevent storm water from entering the container.
- Never dispose of waste products, such as food or liquid wastes, to storm drains. Donate edible food to a food donation bank, participate in food waste composting programs, contact an animal feed company or dispose of food waste in a trash receptacle.
- Never wash down dumpsters or dumpster areas with a hose. If a dumpster must be cleaned, contact the dumpster leasing company. Use dry clean up methods to wash dumpster area or use other Best Management Practices (BMPs) to clean dumpster area to prevent wash water from flowing to the storm drain system.
- Improper handling and disposal that creates a discharge to a storm drain is illegal. Both the company and individuals responsible are subject to civil and criminal prosecution.

Description and Applicability

The installation and maintenance of a grease interceptor is an important measure in ensuring that a FSE does not contribute to problems with the wastewater collection system. Grease interceptors differ from grease traps, which are small indoor devices. A grease interceptor is an outside, underground multi-compartment tank that reduces the amount of pollution (FOG) in Wastewater, before discharge into the wastewater collection system. Grease interceptors are two-compartment units that apply a physical separation process to detain wastewater and allow FOG and water to separate due to differences in specific gravity. The separated FOG rises to the top, water flows to the wastewater system from below, and solid materials settle on the bottom. The floating grease layer is prevented from flowing to the wastewater system by a "Tee" or baffle that is installed on the effluent chamber of the interceptor. The detention capacity of the unit decreases as grease and solids accumulate; therefore, regular pumping, cleaning, and maintenance of grease interceptors are essential to ensure proper operation. For grease interceptors to be effective, the units must be properly sized, constructed, and installed in a location that provides easy access for inspection and cleaning. Grease interceptors are pretreatment facilities that are subject to plan submission and operations requirements of the City Code § 7.12.070.



Section of a typical grease interceptor

Installation Requirements

General

Individual grease interceptors are required for FSE's, whether or not such facilities are located in a separate building or structure or occupy space in a building or structure that is occupied by other businesses. If the volume or nature of food service provided by the establishment dictates significant food preparation, operation of a garbage grinder, and automatic dishwasher, a discharge of FOG waste is highly likely and a grease interceptor

is required. There are some exceptions to the requirement for a grease interceptor, pursuant to the conditions set in the section “Permit Requirements.”

Each new grease interceptor or grease trap that is installed to replace or upgrade existing grease traps or grease interceptors will be required to meet all criteria stated in the current uniform plumbing code.

Developers of shopping centers currently are encouraged by the City of Waterford to install two dedicated sanitary service lines, stub outs to direct the kitchen wastes of future food service facilities into an outside grease interceptor, and then return the effluent from the grease interceptor back into the building sanitary sewer.

For properties with multiple FSE’s on a single parcel, each FSE shall be individually and separately responsible for installation and maintenance of the grease interceptor. A single grease interceptor can be used to service multiple FSE’s only upon approval by the Director (City Code § 7.12.090).

Installation Specifications

Grease interceptors shall be installed in conformance with the current version of UPC Appendix H for the installation of grease interceptors. This document includes detailed specifications for the following:

- Required and prohibited interceptor connections,
- Design requirements,
- Sitting requirements,
- Maintenance requirements,
- Sizing criteria, and
- Variances.

In addition, this manual recommends that all grease interceptors be installed in such a manner that they can be accessed and properly maintained 24 hours per day. Manhole covers are required to be accessible at all times. Therefore, interceptor manhole covers should not be covered with asphalt, concrete, landscaping, or other materials. If a grease interceptor is located in a landscaped area, all access manhole frames and covers shall have a twelve (12) inch wide concrete collar.

Additional Considerations

It is important for a FSE to weigh costs and benefits and consider operational characteristics when evaluating grease interceptor design and capacity needs. While the initial capital investment may be less with a smaller-capacity grease interceptor, an establishment risks paying more in pumping and maintenance fees and possibly fines should the interceptor prove to be inefficient in meeting FOG requirements. The following is a list of changes that could initiate an increase in FOG discharges and expose owners of FSE’s to possible violations and sewage spill overflows:

- Menu expansion
- Seating capacity expansion

- Menu changes
- Changes in facility management and the use of BMPs

Therefore, FSE operators are encouraged to consider the following when selecting and installing a grease interceptor:

- Plan for the worst-case scenario, or at the very least, invest in a grease interceptor that is slightly larger than the minimum size calculated based on the current version of the UPC.
- Consider physical aspects of the building (size, parking spaces, number of seats, number of meals).
- Consider establishment characteristics (e.g., menu, serving schedule, single service/full service, etc.).
- In places where flows in the wastewater system are low, users need to exercise greater care in grease control. Areas of low flow are a normal aspect of wastewater systems and are not considered design deficiencies or engineering or infrastructure problems.
- Assess future needs for expansion and growth.
- Evaluate effectiveness of establishment grease management practices.
- Plumb the grease interceptor to receive kitchen wastes only. To minimize hydraulic load, it is recommended that a separate drain be plumbed for hand sinks, condensate lines, or other non-grease-laden water.
- All grease interceptors must be fully accessible to allow for regular maintenance, inspection, cleaning, and potential sampling. FSE's can be severely inconvenienced when grease interceptors are placed in drive-through lanes or other access or parking areas.

Operation and Maintenance and Requirements

Operation

A grease interceptor is a tank comprised of two compartments separated by a baffle. Each compartment is accessible through a separate manhole. A "Tee" is positioned on the inlet to the first compartment to route the flow downward to the bottom of the compartment thereby reducing turbulence within the unit. There is also a "Tee" on the outlet from the second compartment that ensures outflow originates from the bottom of the compartment and that the floating grease layer is retained. A missing, altered, or damaged outlet "Tee" is an impairment of the ability of the grease interceptor to pretreat the wastewater and could result in violations of City Code § 7.12.280.

Maintenance

Proper operation and maintenance of grease interceptors includes routine inspection, cleaning, pumping, and repair as described in this section. These units are less effective if FOG and solids occupy greater than 25 percent of the interceptor's capacity. It is recommended that FSE's inspect grease interceptors at least every three months.

During each inspection, it is recommended that users document measurement of the grease layer, in inches, in both compartments by pushing a garden hoe through the grease layer or taking a core sample with a "sludge judge." During each inspection of a Grease Interceptor, it is recommended that FSE's open both manholes and confirm that the "Tees" on both the inlet and outlet pipes are intact. Inspections should be documented in accordance with the Recordkeeping activities, described below.

Inspection

The Director may inspect and sample wastewater discharges of any FSE to ascertain whether conditions of the FOG discharge permit are being met. Reasonable access to all parts of the FSE shall be made available when inspection and/or sampling of the wastewater is required (§ 7.12.230 and 7.12.240). The FSE shall make available, for the purposes of inspection, the following (§ 7.12.220 B):

- Access to grease control devices
- Manifests, receipts, and invoices of grease device maintenance
- Documents identifying the waste hauler carrier
- Documents identifying the disposal site locations

The following table describes how often inspections of the grease interceptor and the kitchen BMPs are to be performed by the Director or City representatives:

Permit and Inspection Frequency Table

	No FOG Discharge	FOG Discharge + Grease Device	FOG Discharge + No Grease Device
Permit Renewal	1 yr	1 yr	1 yr
BMP Inspection	1 yr	1 yr	6 mos.
GI Inspection	1 yr	6 mos.	N/A

Cleaning

If the FOG and solids occupy greater than **25 percent of an interceptor's capacit**y, the FSE is required to perform a full cleaning of the grease interceptor. **Cleaning must be performed by a licensed waste hauler with an approved license from an authorizing agency.** Both vaults of a grease interceptor shall be left completely empty upon completion of pumping operation. The grease mat, liquids, sludge, and scrapings from the interior walls must be removed. Under no circumstances, may the waste hauler reintroduce the removed water or materials be reintroduced into the City of Waterford sewer system. Flushing an interceptor with hot water, or the use of chemicals or other agents to dissolve or emulsify grease and allow it to flow into the wastewater treatment system, is a violation of City Code 7.12.280.

Since the FSE is the generator of the grease waste, is liable for the condition of their pretreatment devices, and is paying for the cleaning service, the FSE owner or designee may want to witness all cleaning/maintenance activities to verify that the Grease

Interceptor is being fully cleaned and properly maintained. The following are the pumping practices required of licensed waste haulers:

Step 1: Skim the entire grease cap and debris from the top of the Grease Interceptor. The interceptor may need to be agitated slightly to loosen the grease cap.

Step 2: Place the vacuum tube all the way into the Grease Interceptor to withdraw remaining solids from the bottom.

Step 3: Vacuum water out of the Grease Interceptor.

Step 4: Clean the sides and bottom of the Grease Interceptor. This may be done by "back flowing" the water from the pump truck or by using a hot water source to hose down the interceptor. Make sure the Grease Interceptor is completely clean.

Step 5: Vacuum the remaining water out of the Grease Interceptor.

Step 6: Check that the sanitary "Tees" on the inlet and outlet sides of the Grease Interceptor are not clogged, loose, or missing.

Step 7: Verify that the baffle is secure and in place.

Step 8: Inspect the Grease Interceptor for any cracks or other defects.

Step 9: Check that lids are securely and properly seated after completion of pumping.

Step 10: Provide a copy of the liquid waste hauler load ticket (manifest) to the FSE (waste generator). An example of this form is provided in the Appendices section of this manual.

Record keeping

It is required that FSE's maintain a written record of every time a grease interceptor is inspected and cleaned and it is a violation of city code when the FSE fails to maintain and keep up-to-date accurate records of all cleaning, maintenance, and removal of FOG wastes (§ 7.12.280).

Inspection records should document date of inspection, name of company and person performing inspection, estimated volume of FOG present, and the signature of the manager or designee of the FSE. An example of this record is provided in the Appendices section of this manual.

Cleaning records should document the date of maintenance, name of company and person performing maintenance, estimated volume of FOG removed, disposal location, and establishment manager's, or designee's, signature for verification. A manifest from the permitted liquid waste hauler is an acceptable record, if it contains all of the above information.

It is required that Inspection and cleaning records be maintained on the premises for a period of at least two years and be made readily available to the City of Waterford personnel for review and inspection (§ 7.12.220 B).

SECTION V: PUBLIC EDUCATION

The City of Waterford will provide resources to educational materials to FSE's. Brochures and posters have been prepared in English and Spanish that describe Best Management Practices to handle FOG wastes. These brochures can be provided to every FSE in the City's service area to educate people on FOG BMPs and to provide on site visits to newly licensed establishments.

Websites are also available for more information regarding FOG:

www.cityofwaterford.org
The City of Waterford Department of Public Work's Sewer / Wastewater Division is responsible for maintaining the City's sewer collection system. Approximately 600,000 gallons of sewage is collected each day and is transported by 25 miles of pipe ranging in size from 6" to 12" in diameter, pumped by three separate sewer lift stations until it reaches the Wastewater Treatment Facility where it is processed for treatment.

www.waterboards.ca.gov/water-issues/programs/sso
This is the direct link to the Regional Board Order that discusses waste discharge requirements and deadlines that sewer agencies and municipalities are required to meet.

www.epa.gov/owm
The United States Environmental Protection Agency's Office of Wastewater Management (OWM) oversees a range of programs contributing to the well being of the nation's waters and watersheds. Through its programs and initiatives, OWM promotes compliance with the requirements of the Federal Water Pollution Control Act.

www.cafog.org
The mission of this organization is to identify actions for reducing SSO's that result from blockages caused by fats, oils, and grease in wastewater collection systems and implement those actions to the extent feasible by a stake holder group which includes wastewater agencies, regulators, restaurants, and other industry associates.

SECTION VI: PERMITS AND ENFORCEMENT

Description and Applicability

This section provides a description of the permit requirements and enforcement procedures that apply to FSE's that fail to comply with the requirements in City Ordinance and any other applicable laws of other agencies.

The EPA, in its general pretreatment regulations (40 CFR Part 403) and the City, in its FOG Ordinance, prohibit any user, including FSE's, from discharging solid or viscous pollutants, such as FOG wastes, in amounts which will cause obstructions (blockages) to the flow in the wastewater system and interfere with the operation of the wastewater system. The City of Waterford is required by the EPA, the State, and City code, to initiate enforcement actions against users of the wastewater system, who violate this prohibition.

The City of Waterford will initiate enforcement actions for noncompliance, but it is possible for the EPA or the State to initiate their own enforcement actions if, in their opinion, the City has not taken adequate enforcement.

Permit Requirements

All FSE's are required to obtain a FOG Wastewater Discharge Permit to discharge wastewater into the sewer system and pay a fee as set by the permit fee schedule.

Grease interceptors shall be required for all new and existing FSE's during the plan review/building permit process. A variance or a waiver may be granted when certain terms and conditions are met (§ 7.12.070). Please see below.

Variances and Waivers

Grease interceptors shall be required for all new and existing FSE's during the plan review/building permit process. A variance or a waiver may be granted when certain terms and conditions are met (§ 7.12.070).

Conditions for a Variance (§ 7.12.080 A):

1. An alternative technology that is equally effective in controlling FOG discharge and that it is impossible to install a grease interceptor
2. FSE demonstrates to Director's satisfaction that FOG discharge is negligible and will have insignificant impact to sewer system; or

Conditions for a Waiver (§ 7.12.080 B):

In the case when conditions for a variance cannot be met, a waiver from grease interceptor requirements may be granted with the charge of a grease disposal mitigation fee. This fee would cover the costs for the City of Waterford to perform regular sewer pipe cleanings in areas with potential to cause sewer blockages and overflows.

However, a waiver from installing a grease interceptor would not be granted if either:

1. An FSE applies for a discretionary permit; or

2. A major remodeling of an FSE involving $50,000 or more is done and involves any one or more combination of the following:
    a. Under slab plumbing in the food processing area.
    b. A 30% increase in net public seating area
    c. A 30% increase in kitchen size area
    d. Any change in size or type of food preparation equipment.

Exemptions and Mitigation Fee

- *Exemption from FOG Discharge Permit:* A limited food preparation establishment is not considered a Food Service Establishment and is exempt from obtaining a FOG Discharge Permit. Exempted establishments shall be engaged only in reheating, hot holding or assembly of ready to eat food products and as a result, there is no wastewater discharge containing significant amount of FOG. A limited food preparation establishment does not include any operation that changes the form, flavor, or consistency of food.
- *Grease disposal mitigation fee:* FSE's that operate without a grease control interceptor may be required to pay an annual Grease Disposal Mitigation Fee to equitably cover the costs of increased maintenance and administration of the sewer system as a result of the FSE's' inability to adequately remove FOG from its wastewater discharge. This section shall not be interpreted to allow a new FSE, or existing FSE's undergoing remodeling or change in operations, to operate without an approved grease interceptor unless the Director has determined that it is impossible to install a grease interceptor.

Blockages and Sewer Spills

- *Blockages:* Enforcement activities often commence with investigations of blockages and overflows of the wastewater system. Such investigations may include closed circuit television inspection of sewer lateral lines and privately owned service lines. These inspections are used to determine contributing factors causing the blockage or overflow, such as defective infrastructure, accumulated roots and/or debris, and to seek visual evidence of FOG waste accumulation between the site of the stoppage or overflow and upstream FSE's. If significant FOG accumulation is observed in the service line of an upstream FSE, that establishment is identified as causing or contributing to the downstream stoppage or overflow. Inspection findings for the grease traps and grease interceptors of upstream FSE's are also used to determine:
- *Sewer spills and cleanup costs:* Notwithstanding any waiver of grease interceptor, FSE's determined by the Director to have contributed to a sewer blockage, SSOs or any sewer system interferences resulting from the discharge of wastewater, may be ordered by the Director to

immediately install and maintain a grease interceptor and any other requirements.

Violations and Enforcement Responses

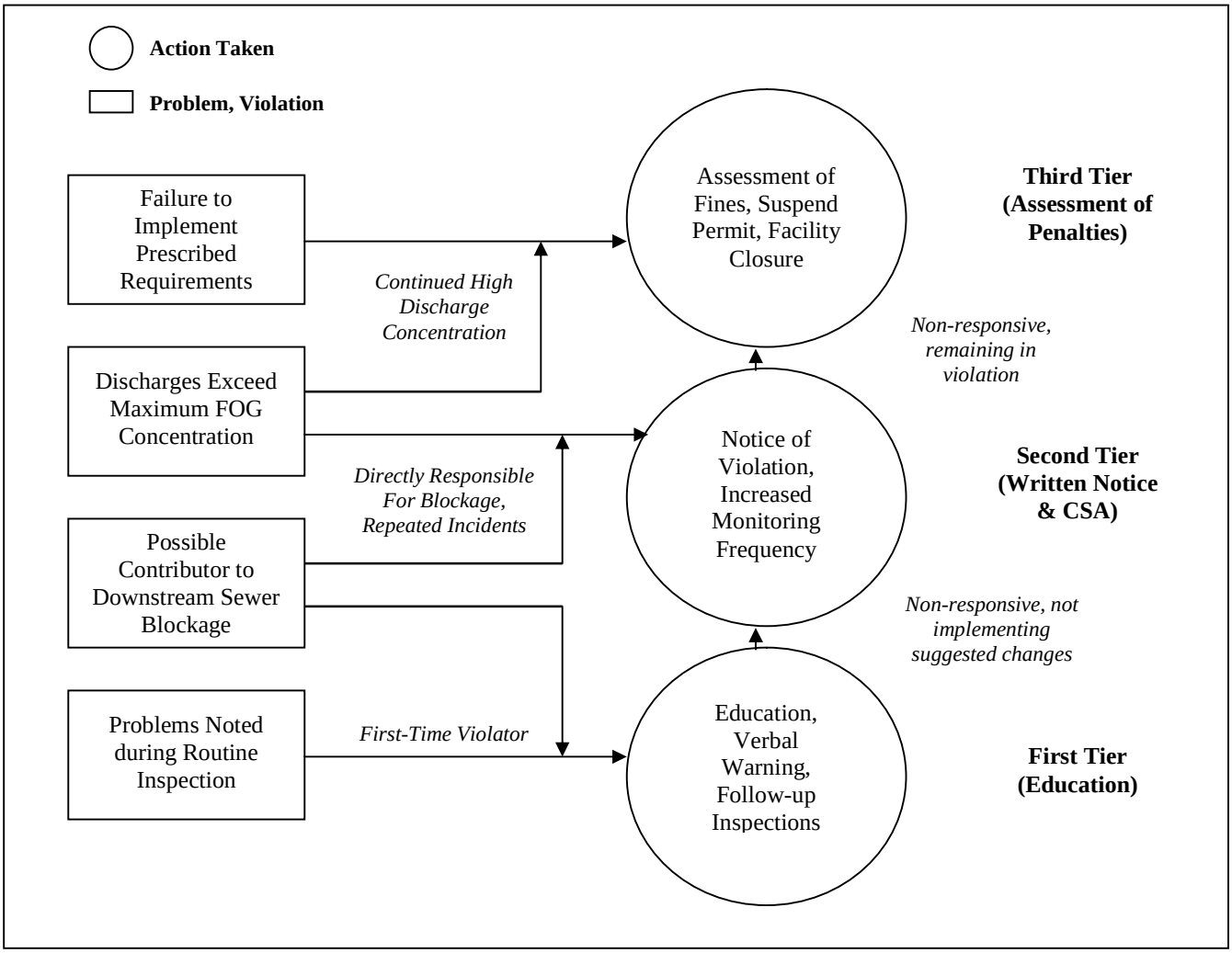
The City of Waterford has a range of enforcement responses that can be applied for compliance to the FOG Ordinance. The enforcement remedies are cumulative; in other words, they may be used individually, sequentially, concurrently, or in any order.

It is the expectation of the City that efforts to keep FOG from entering into the wastewater system can be achieved with public education and common interest in preventing health hazards and damage to homes and businesses.

Violations of the City's FOG Ordinance can include:

- Failure to install an approved grease control device
- Makes any false statement, representation, record, report, plan or other document that is filed with the City
- Tampers with or knowingly renders inoperable any grease control device
- Fails to clean, properly operate, maintain or remove FOG from a grease control device within the required time for such cleaning, maintenance or grease removal
- Fails to keep up-to-date and accurate records of all cleaning, maintenance, and FOG removal and upon request to make those records available to any City Code Enforcement representative, or his or her designee, any representative of a local sanitation agency that has jurisdiction over the sanitary sewer system that services the FSE, or any Authorized Inspector
- Refuses a City Code Enforcement representative, or his or her designee, a representative of a local sanitary sewer agency that has jurisdiction over the sanitary sewer system that services the FSE, or any Authorized Inspector, reasonable access to the FSE for the purposes of inspecting, monitoring, or reviewing the Grease Control Device manifests, receipts and invoices of all cleaning, maintenance, grease removal of/from the Grease Control Device, and/or to inspect the Grease Control Device
- Disposes of, or knowingly allows or directs FOG to be disposed of, in an unlawful manner
- Fails to remove all food grinders located in the Food Facility by the date specified by the Ordinance
- Introduces additives into a wastewater system for the purposes of emulsifying FOG without the written, specific authorization from City and the sanitary sewer agency that has jurisdiction of the sanitary sewer system that services the FSE
- Fails to pay the Grease Disposal Mitigation Fee
- Fails to comply with the provisions of the FOG Manual
- Otherwise fails to comply with the provisions of the FOG Ordinance or any permit issued by the City

Below are possible procedures the City may take to enforce the FOG Ordinance:



Hierarchy of Possible Enforcement Responses to FOG Discharges from an FSE

Notices of Violation

Notices of violation may include verbal notice, information production/compliance review meeting, inspections, field notices of observed violations, and notices of violations. Regarding notices of violation, an informal conference with the City may be requested and an appeal is available after an informal conference. The notification of violation is more fully explained below.

During an inspection of a FSE, if a violation is noted, a written notice of violation may be served. This document identifies the specific requirements that were violated, the fact alleged to constitute the violations, and it may include any corrective action(s) proposed to be required. Within ten (10) days of the receipt date of this notice, a written

explanation of or response to the violation and a plan for the satisfactory correction and prevention thereof must be submitted. An example of this document is provided in the Appendices.

The corrective actions contained in a Notice of Violation could include the following:

- Implementing specific BMPs to control FOG wastes, including submittal of a CSA;
- .Increasing the inspection and/or cleaning frequency of a Grease Trap or Grease Interceptor;
- Provide adequate maintenance and/or access to the Grease Trap or Grease Interceptor; and
- Other items deemed appropriate by the Director or his designee.

Compliance Schedule Agreement

Upon determination by the Director that a FSE or owner of a property is in noncompliance with its FOG Wastewater Discharge Permit or any other provision, or needs to construct and/or acquire and install a grease control device or grease interceptor, the Director may require the permittee, owner or operator to enter into a CSA (§ 7.12.290). A CSA must include the following information:

- A description of the FSE operation,
- A description of the location and size of any Grease Interceptors and Grease Traps present,
- A description of the FOG BMPs used by the FSE,
- A description of the procedures to prevent discharges of waste fat, oils and grease,
- A description of waste FOG handling, storage, and disposal procedures,
- A description of how the Grease Interceptor or Grease Trap will be maintained (cleaned) including frequency of cleaning,
- A description of how the FSE will comply with quarterly reporting requirements, and
- A certification statement that is signed by the owner or manager of the FSE.

The City will provide the FSE with written notice of its acceptance of the FOG control plan. The Director may require modifications to a FOG control plan, if the plan submitted by a FSE is determined to be inadequate. Failure to implement any element of an accepted plan is a violation and subject to enforcement.

Administrative Hearing Procedures

Any FSE, permit applicant, or Permittee adversely affected by a decision made by the Director may appeal the decision and file a written request for hearing before the City Administrator, if such filing is done within 10 days of the decision and accompanied by an appeal fee.

APPENDICES

This section includes samples of the following documents:

A. Grease Interceptor Reporting Instructions
B. Grease Interceptor Maintenance Log
C. FSE Employee Training Log

City of Waterford
101 E Street
Waterford, CA
95386

Fats, Oils, and Grease (FOG) Program
Grease Interceptor Maintenance
Reporting Form Instructions

The Grease Interceptor Maintenance Log Form is designed to assist you with keeping your facility up-to-date on inspection, cleaning, and maintenance of your grease trap(s) or interceptor(s). Proper and timely use of this form is essential. Failure to do so may trigger a FOG Inspection by the City of Waterford. Please follow the steps detailed below to ensure your remain in compliance with the goals of the FOG Management Program. Careful maintenance of your trap or interceptor will help keep the sanitary sewer system free of unnecessary grease build-up and blockages.

- Post the Reporting Form in an obvious location near the trap or on a door on the way out to the interceptor. Use only ink when filling in the spaces.
- Instruct any employee that may inspect, clean, or maintain traps or interceptors on proper procedures. Detailed instructions can be found in your copy of the City of Waterford FOG Control Manual.
- Fill in each space per row every time the trap or inceptor is inspected or cleaned.
- Have a manager inspect all skimming and cleanings done by employees and sign off in the signature column. Professional cleanings do not require managerial inspections, but knowing what to expect from the cleaners will help protect you from certain liabilities.
- If you don't have a professional cleaning and maintenance service scheduled on a regular basis, make it a habit to call them periodically to have your system cleaned and inspected. They will be able to offer you any feedback about your traps and inceptors, and can tell you if you need more or less cleaning in the future.
- When the form is full, file it in a safe location and make it available for inspection upon request. A new form will be sent to you when we receive your old one.
- Remember practicing proper kitchen BMP's and effective implementation of FOG Management can protect your business from possible fines, penalties, and health-related problems.

If at any time you have any questions about the FOG Program or you would like to request a FREE technical assistance visit, please contact Public Works at (209)874-2328. Additional information on the FOG Program can be found on the City's website, www.cityofwaterford.org.

CITY OF WATERFORD
WWT DIVISION
(209) 874-4094

Grease Interceptor Maintenance Log

For

_____
(*Establishment Name*)

Date	Cleaned By	Witnessed By	Gallons Pumped	Grease Disposal Site Address	Remarks/Condition of Interceptor/Device

City of Waterford
101 E Street
Waterford, CA 95386

www.cityofwaterford.org

FOOD SERVICE ESTABLISHMENT TRAINING LOG

KEEP ON FILE ON PREMISES FOR NO LESS THAN 2 YEARS

"Think before you put it down the Sink"

INSTRUCTIONS: To be filled out by the Food Service Establishment and filed in the Employee Training Folder. Use this form to record training sessions and attendance. All employees must attend a grease control training session once each year. Training must include distribution and review of the City of Waterford FOG Control Manual and instruction on Kichen BMP's as outlined.

BUSINESS NAME:

ADDRESS:

Employees: Your signature on this form acknowledges that you have reviewed the City of Waterford FOG Control Manual and have been properly instructed by your employer on Kitchen BMP's as outlined.

DATE	EMPLOYEE NAME	SIGNATURE	MGR INITIAL

City Code: Documents must be kept on file for no less than two years. It shall be unlawful to make any false statement, representation, record, report, plan, or other document that is filed with the City.