



SOUTH PLATTE
**WATER RENEWAL
PARTNERS**
OWNED BY LITTLETON/ENGLEWOOD

Industrial Pretreatment Division

Fats, Oils and Grease (FOG) Policy

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1.0 Purpose

The purpose of this policy is to minimize the loading of animal/vegetable fats, oils, and grease (FOG) entering the Publicly Owned Treatment Works (POTW) at the source. FOG can contribute to sewer blockages, causing sanitary sewer overflows, backups, and can interfere with equipment and processes at the wastewater treatment plant.

2.0 Scope and Applicability

2.1 Scope

This policy encompasses the entire service area of the South Platte Water Renewal Partners (SPWRP), which includes the cities of Littleton and Englewood and all connecting sanitation districts.

2.2 Applicability

2.2.1 Non-domestic Users

This policy applies to any non-domestic user in the SPWRP service area where preparation, manufacturing, or processing of food occurs including but not limited to restaurants, cafes, fast food outlets, pizza outlets, delicatessens, sandwich shops, coffee shops, schools, nursing homes, bakeries, and other facilities that prepare, service, or otherwise make foodstuff available for consumption. These users shall install and maintain a gravity grease interceptor (GGI) and implement best management practices (BMP) as determined by the control authority. If an applicable non-domestic user is located in a sanitation district in the SPWRP service area with an approved FOG program, then the user shall follow the requirements of that sanitation district.

2.2.2 Domestic Users

This policy does not apply to domestic users. However, the best management practices (BMPs) set forth in this policy are recommended for domestic users to assist in keeping the collection system and private sewer lines flowing freely.

3.0 Definitions and Acronyms

3.1 Definitions

Best Management Practices (BMP) – Schedules of activities, prohibitions or practices, maintenance procedures, and other management practices; it also includes treatment requirements, operating procedures, and practices to control plant site runoff, spillage or leaks, sludge or waste disposal, or drainage from raw materials storage.

City – Either the City of Littleton or the City of Englewood, wherever the facility resides.

Control Authority – The Cities of Littleton and Englewood or their designee, including the Division and connecting sanitation districts.

Division – The Industrial Pretreatment Division of the SPWRP is herein referred to as the Division.

Domestic User – Any private residential user that discharges wastes derived from ordinary living processes excluding any commercial or industrial wastes.

Drainage Fixture Unit (DFU) – A measure of the portable hydraulic demand on the water supply by various types of plumbing fixtures. The supply fixture unit for a particular fixture depends on its volume rate of supply, time duration of a single supply operation, and average time between successive operations.

Fats, Oils, and Grease (FOG) – Non-petroleum fats, oils, and grease derived from animal or plant sources.

Grease Interceptor or Gravity Grease Interceptor (GGI) – A plumbing appurtenance or appliance that is installed in a sanitary drainage system to intercept non-petroleum fats, oils, and grease (FOG) from a wastewater discharge and is identified by capacity volume and number of compartments. GGIs shall be installed in an accessible exterior location, have a minimum of seven hundred and fifty (750) gallons capacity, and have a minimum of two (2) compartments separated by a baffle wall.

Grease Trap or Hydro-mechanical Grease Interceptor (HGI) – A plumbing appurtenance or appliance that is installed in a sanitary drainage system to intercept non-petroleum FOG from a wastewater discharge and is identified by flow rate, and separation

and retention efficiency. The design may incorporate air entrainment, hydro-mechanical separation, interior baffling, and/or barriers in combination or separately. HGIs are not permitted in lieu of GGIs.

Inactive GGI – An existing GGI that is no longer being used for its intended purpose.

Non-domestic User – Any user that does not meet the criteria for categorization as a domestic user shall be considered a non-domestic user.

Publicly Owned Treatment Works (POTW) – Includes any devices or systems used in the collection, storage, treatment, recycling, and reclamation of sewage and any conveyances, which convey wastewater to the treatment plant.

User – Any person who contributes, causes, or permits the contribution of wastewater into the POTW.

Waste Grease Bin (WGB) – Any receptacle used to store waste grease collected from fryers, grills, woks and other similar devices.

3.2 Acronyms

BMPs – Best Management Practices

DFUs – Drainage Fixture Units

FOG – Fats, Oils, and Grease

GGI – Gravity Grease Interceptor

HGI – Hydro-mechanical Grease Interceptor

SPWRP – South Platte Water Renewal Partners

POTW – Public Owned Treatment Works

WGB – Waste Grease Bin

4.0 Roles and Responsibilities

4.1 Division

The Division is responsible for implementing this policy. Duties include but are not limited to reviewing building plans, inspecting applicable users for compliance, and enforcing policy requirements. The Division may delegate these responsibilities to sanitation districts or outside contractors which represent the Division.

4.2 Sanitation Districts and Contractors

Sanitation districts and contractors may be delegated to perform the roles and responsibilities of the Division. Sanitation districts may also develop a FOG program separate from that of the Division. See Section 5.0 for further information.

4.3 Users

Users, to which this policy applies, as identified in Section 2.2, shall comply with all requirements listed in Section 5.0. Users who are governed by a sanitation district policy and/or requirement in accordance with Section 5.0 shall comply with those requirements. The user shall permit inspections by the Control Authority with or without notice for the purpose of determining applicability and/or compliance with this policy or applicable sanitation district policy or requirements.

5.0 Requirements

This section describes the requirements for all applicable users. Prior to purchasing a business or signing a lease for an existing retail space, it is recommended the user contact the Control Authority with questions about their requirements. This can help users avoid costly mistakes or oversights.

5.1 Plan Reviews

The user and/or owner of the property, business, or industry or an authorized representative of the user shall contact the Control Authority for the purpose of obtaining a plan review. The plan review shall determine the need, size, location, and other requirements of the GGI necessary to control discharges. Written approval from the Control Authority must be obtained prior to installation of the GGI. The review of such plans and operating procedures shall in no way relieve the user from the responsibility of modifying such facilities as necessary to produce a discharge acceptable to the control authority in accordance with Municipal Code.

Plans shall be submitted for approval prior to any of the following:

- Sale or transfer of ownership of the business,
- Construction of a new building,

- Change in the trade name under which the business is operated,
- Change in the nature of the services provided or building use that affects the potential to discharge FOG, and/or
- Remodeling of the facility that may result in an increase in flow or FOG loading or that otherwise requires the facility to submit plans or specifications for approval through a building or zoning department, or any other formal approval process of a city, county, or other jurisdiction.

All plans submitted to the Control Authority must show the location of the GGI, clearly identify plumbing and plumbing fixtures that connect to the GGI, identify plumbing and plumbing fixture sizes, and a table or schedule identifying plumbing fixtures. Plans shall include proposed GGI size in accordance with the GGI sizing criteria provided in Section 5.2.2. Plans shall include a GGI detail showing internal plumbing, dimensions, cleanouts, and vent piping. If plan approval has been obtained, said plans shall not be deviated from. If a situation warrants the change of an approved plan, an amended copy must be resubmitted to the Control Authority for approval.

GGI installation and associated plumbing shall be inspected and approved by the Control Authority prior to backfilling.

5.2 GGI Criteria

5.2.1 GGI Plumbing and Structural Requirements

Sinks, floor drains, floor sinks, mop sinks, disposals, dishwashers and other plumbing fixtures in kitchens, bars, bussing stations, and other food service areas into which wastewater is likely to or has the potential to contain FOG must be connected to the GGI. Water closets, urinals, and other plumbing fixtures conveying human waste shall not drain into or through the GGI.

Each business establishment for which a GGI is required shall have a GGI serving only that business. Shared GGIs are only allowed under limited circumstances determined by the Control Authority on a case-by-case basis. If a GGI is used by more than one business, the property owner or property manager will be required to ensure the GGI is maintained in accordance with Control Authority requirements.

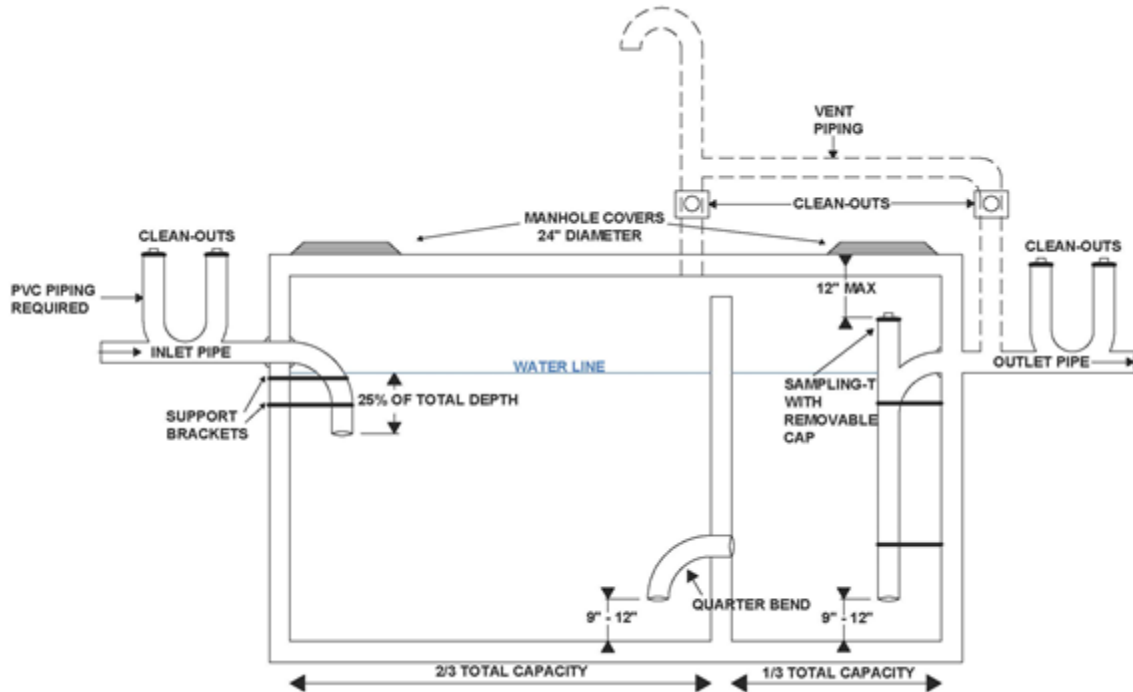
All GGIs and associated plumbing shall be installed by a licensed plumber or contractor. All GGIs must have two compartments separated by a baffle wall. The primary compartment shall have a volume equal to two-thirds of the total capacity, and the secondary compartment shall have a volume equal to one-third of the total capacity. Each compartment shall be accessible by a traffic rated manhole above the inlet and outlet piping with a minimum diameter of 24 inches. Manhole covers shall not be locked, or otherwise fastened in place such that access is restricted.

All plumbing shall be compatible with food service wastewater, such as PVC. A sampling-T with a removable cap shall be placed at the outlet end of the GGI to allow sampling of effluent. The top of the sampling-T shall be no more than one foot below grade. In order to maximize retention time in the primary chamber, the bottom of the inlet piping shall extend down 25% of the total water depth. The bottom of the outlet piping must extend down between 9 and 12 inches above the floor of the GGI. Flow from the primary to secondary compartment shall be through a quarter bend elbow, or similar device equivalent in cross sectional area to the inlet piping into the GGI, and shall extend down in the primary compartment of the GGI with a height above the base between 9 and 12 inches. Support brackets are required for inlet and outlet piping. Cleanouts and venting shall be PVC. GGIs shall have two (2) vent pipes, one shall vent the body of the GGI and one vent pipe shall connect to the external effluent piping. Vent pipes shall remain independent to a location above finished grade. Vents shall be independent of any other building venting system and shall be in accordance with local building codes. Refer to Figure 1 for a diagram of a GGI.

If the Control Authority has determined that no GGI is to be installed, the user shall connect all plumbing fixtures listed in Section 5.2 to a sanitary sewer line separate from the domestic sanitary sewer line. This separate sanitary sewer line shall have a cleanout located outside of the building to allow the Control Authority access for sampling. The separate sanitary sewer line is designed to allow representative compliance sampling and installation of a GGI should one be required. This line may be combined with the domestic sanitary sewer at a point after this cleanout. If a facility's discharge exceeds the control authority's limit for oil and grease or contributes to an excess build-up of FOG in

the sanitary sewer line, the user may be required to install an appropriately sized GGI. The user may be charged for any fees associated with sampling, including labor costs, travel time, sampling supplies, and analytical costs.

Figure 1: Gravity Grease Interceptor



5.2.2 GGI Sizing

The sizing of the interceptor shall be determined by using Tables 1-3 (Uniform Plumbing Code 2009). If the GGI is being sized for a vacant shell building, Table 3 shall be used to determine the GGI volume.

Table 1: GGI Sizing Based on Drainage Fixture Units (DFUs)

Fixture Type	Drain Size	Drainage Fixture Units (DFUs)	Quantity	TOTAL
Floor Drain	2.0-3.0"	2.0		
Floor Sink	2.0"	4.0		
	3.0"	6.0		
	4.0"	8.0		
Mop Sink	2.0-3.0"	3.0		
Hand/Bar Sink	1.5-2.0"	2.0		
Additional Fixture(s) (direct connection)	1.5"	3.0		
	2.0"	4.0		
	3.0"	6.0		
	4.0"	8.0		
TOTAL DFUs				

Table 2: Minimum GGI size based on Total DFUs

Total DFUs (from Table 1)	GGI Volume (gallons)
2-21	750
22-35	1000
36-90	1250
91-172	1500
173-216	2000
217-307	2500
308-342	3000
343-428	4000
429-576	5000
577-720	7500
721-2112	10000
2113-2640	15000

Table 3: GGI Sizing for Unfinished Building Shells

GGI Inlet Pipe Size (inches)	GGI Size (gallons)
2	750
3	1,000
4	2,000
5	4,000
6	7,500

5.2.3 GGI Location

Each GGI shall be installed and connected so as to be easily accessible at all times for inspection, cleaning, pumping, and maintenance. Each GGI manhole cover shall be readily accessible and safely removable for servicing and maintaining the GGI. The use of ladders, the removal of bulky equipment, or any other circumstance that impedes safe access in order to service or inspect GGIs shall constitute a violation of accessibility. GGIs are not permitted to be located in parking spaces or drive-thru lanes. GGIs shall not be installed in any part of a building where food is handled. Location of all GGIs shall be shown on the approved building plan.

5.2.4 GGI Maintenance

GGIs shall be maintained, at the expense of the user, by regularly scheduled pumping to ensure the proper operation necessary to efficiently intercept the FOG from the user's wastewater and prevent the discharge of said materials into the POTW. A GGI shall be serviced at a minimum of every 90 days or more frequently as needed to ensure that the total accumulation of FOG and settled solids does not exceed twenty-five percent (25%) of the GGI's total capacity. The Control Authority may allow a less frequent pumping schedule if the user can demonstrate the GGI does not need to be pumped every 90 days. Users seeking a modified pumping schedule shall complete an application demonstrating a less frequent pumping schedule is adequate. Applications will be reviewed by the Control Authority. Written approval must be obtained by Control Authority staff before any modified pumping schedule can be implemented. All users are required to structurally maintain all components of their GGI(s) as per the design requirements in Section 5.2.1 of this document.

Maintenance of GGI(s) shall be performed in a workman-like manner only by a business or professional normally engaged in the servicing of such plumbing fixtures. Users should ensure that companies used for the removal and transportation of grease waste are properly registered with the Colorado Department of Public Health and Environment. Partial removal of contents (i.e., removal of grease layer, oil layer or sludge layer) is prohibited. Contents removed from GGIs shall be hauled off-site and disposed of properly. Under no circumstances shall GGI contents be reintroduced to the sanitary sewer system. The User must take reasonable steps to assure that all waste is properly disposed of at a facility in accordance with federal, state and local regulations (i.e. through a certification by the hauler included on the waste manifest or trip ticket for each load). Users are responsible for the maintenance, servicing, and proper waste disposal and cannot abrogate this responsibility to a contractor, pumping service, or any other agent.

All records, receipts, and manifests of GGI maintenance, removal of GGI contents, and off-site hauling of FOG waste including waste grease bin (WGB) contents shall remain on the premises and accessible for review by the Control Authority at any time for a minimum of three (3) years. The Control Authority may require a user to submit copies of all records, receipts, and manifests of GGI and/or WGB maintenance, removal of GGI and/or WGB contents, and off-site hauling of FOG waste.

In the event a GGI is not properly maintained by the user, the Control Authority may authorize such maintenance work to be performed on behalf of the user. The costs of such maintenance shall be billed directly to the user and shall become part of the charges due and owing to the control authority and shall constitute a lien against the property until paid in full.

Biological treatment or enzyme treatment shall not be a substitute for the servicing of the GGI. Use of enzymes to emulsify FOG is prohibited. The direct addition of any enzyme, chemical, microbial agent to a GGI is prohibited.

5.2.5 GGI Closure

The Control Authority may determine that a GGI is no longer necessary. This may occur when the wastewater flow through the interceptor is significantly lower due to changes in kitchen practices. A lack of flow through the GGI often causes the GGI to become septic producing noxious sulfide gases, serious odor problems, and other potential health and safety hazards. Inactive GGIs shall be closed by:

- The User must notify the Control Authority prior to closure of the GGI to allow for inspection;
- Complete removal of GGI contents (oil, grease, solids, water, etc.), - performed by a professional service company;
- Submittal and approval of plans or a narrative to the Control Authority detailing the proposed scope of work;
- Sealing of all floor drains and fixtures plumbed to the GGI (if capping of GGI inlet and outlet pipes is required), or the installation of a direct pipe connection from the inlet to the outlet;
- Filling of the empty GGI with an appropriate fill material such as sand, and
- Securing the opening(s) to the interceptor (e.g. cement, weld, etc.).

The Control Authority must receive plans or a narrative detailing the closure activity and written approval must be received by the user prior to beginning work. Inspections of closure activities may be required by the Control Authority prior to securing the opening of the GGI.

5.2.6 Facilities with Existing GGIs

Some facilities may have a GGI in place. An existing GGI may be undersized for a user according to the sizing requirements of Section 5.2. The Control Authority may approve a new user or a user who is required to submit plans for review under Section 5.1 to use the existing GGI if the Control Authority determines it can adequately protect the sanitary sewer from FOG. The existing GGI must have two chambers and be retrofitted to meet the requirements of Section 5.2.

5.3 Hydro-mechanical Grease Interceptor (HGI) Requirements

At the discretion of the Control Authority certain facilities that do not have the potential to discharge excessive amounts of FOG shall be required to install an approved grease control device that meets the American Society of Mechanical Engineers (ASME) A112.14.3 Type C standard in addition to establishing a schedule of BMPs. Food service establishments that may be considered for the installation of an approved HGI, in addition to establishing a schedule of BMPs, may include establishments such as small sandwich shops and small bakeries that do not use flatware, do not utilize an automatic dishwasher, and do not have a garbage disposal.

Sinks, plumbing fixtures in kitchens and other food service areas into which wastewater is likely to or has the potential to contain FOG must be connected to the HGI. Water closets, urinals, and other plumbing fixtures conveying human waste shall not drain into or through the HGI.

All HGIs and associated plumbing shall be installed by a licensed plumber or contractor. All HGIs must be certified to the ASME A112.14.3 Type C standard. HGIs located outside and below-grade are required to be accessible by a traffic rated manhole cover(s). Manhole covers shall not be locked or otherwise fastened in place such that access is restricted. All plumbing shall be compatible with food service wastewater, such as PVC.

If a facility's discharge exceeds the City's limit for oil and grease or contributes to an excess build-up of FOG in the sanitary sewer line, the user may be required to install an appropriately sized GGI.

5.3.1 HGI Plan Review

Plan reviews for the installation of an approved HGI shall comply with the requirements of Section 5.0. Sizing of an approved HGI shall be based on the manufacturer's recommendations and the best professional judgment of the Control Authority. The minimum allowable HGI design flow rate shall be 50 gallons per minute.

Each HGI shall be installed and connected so as to be easily accessible at all times for inspection, cleaning, pumping, and maintenance. Each HGI cover shall be readily accessible and easily and safely removable for servicing, maintenance, and inspection. Location of all HGIs shall be shown on the approved building plan.

5.3.2 HGI Maintenance

Approved HGIs must be cleaned, maintained and inspected on a schedule not to exceed every 90 days. HGI pumping must be completed by a registered grease waste hauler.

5.4 Best Management Practices (BMPs)

The purpose of BMPs is to minimize the discharge of FOG into the sanitary sewer system. The following BMPs shall be implemented by non-domestic users to whom this policy applies. This includes but is not limited to employee training and kitchen practices that are essential in minimizing FOG discharges:

- **Installation of drain screens.** Drain screens shall be installed on all drainage pipes in food preparation areas. This includes kitchen sinks, floor drains and mop sinks. Drain screens shall be cleaned as needed.
- **Segregation and collection of waste cooking oil and grease.** All waste cooking oil and grease shall be collected, segregated and stored properly in waste grease bins (WGBs) or similar devices. WGBs shall be maintained to ensure that they do not leak and are weather-tight. WGBs shall have a cover or lid which is to remain in place at all times when the WGB is not being used. WGBs shall be located in an area that is clean and easily accessible. WGBs shall be pumped before they are 90% full by a licensed waste hauler or an approved recycler.
- **Disposal of food waste.** Food wastes shall be disposed of directly into the trash or garbage and not down the drain.
- **Employee training.** Employee training shall be provided as part of the normal orientation process and annually thereafter, and include, at a minimum, the following subjects:

- How to scrape excess food into the garbage and “dry wipe” pots, pans, dishware and work areas before washing to remove grease,
- The location, use, and disposal of absorption products to clean any spills under fryer baskets and other locations where grease may be spilled or dripped,
- How to properly dispose of grease or oils from cooking equipment into a grease receptacle without spilling,
- The need for and cleaning of drain screens, and
- Proper clean-up techniques of liquid products or other chemical spills, if safe to do so.

Training shall be documented and employee signatures retained indicating each employee's attendance and understanding of the practices reviewed. Training records shall be made available for review at any time by the Control Authority.

- **Kitchen signage.** Signs shall be posted above all sinks prohibiting the discharge of oil, grease, and food waste down the drains.

5.5 Spill Prevention

All users are required to have measures in place to control unwanted discharge to the sanitary sewer. Chemicals, cooking oils, and other liquid products must be stored away from drains or within a containment to reduce the potential for spills reaching the sanitary sewer and/or storm drainage system.

5.6 Sanitation District Policies

Sanitation districts may also develop a FOG program separate from that of the Division if the requirements of that policy meet or are more stringent than the requirements of the Division in the areas listed in Table 4.

Table 4: Minimum Sanitation District FOG Policy Requirements

Division Policy Element	Minimum Sanitation District Policy Requirement
Applicability	The policy shall apply to all applicable users listed in Section 2.2.1
Plan Reviews	Sanitation districts shall conduct their own plan reviews and require plan submission for approval prior to any of the following: <ul style="list-style-type: none"> • Sale or transfer of ownership of the business, • Construction of a new building, • Change in the trade number under which the business is operated, • Change in the nature of the services provided or building use that affects the potential to discharge FOG, and/or • Remodeling of the facility that may result in an increase in flow or FOG loading or that otherwise requires the facility to submit plans or specifications for approval through a building or zoning department, or any other formal approval process of a city, county, or other jurisdiction.
Gravity Grease Interceptor (GGI) Plumbing and Structural Requirements	Sanitation district policy must provide plumbing and structural requirements that adequately protect the publicly owned sanitary sewer system. GGIs must have two chambers (see Section 5.2.1).
GGI Sizing	Sanitation district policy must provide a sizing method that adequately protects the publicly owned sanitary sewer system.
GGI Location	Sanitation district policies shall require GGIs to be accessible for maintenance and inspections.
GGI Maintenance	Sanitation district policies shall include the requirements of Section 5.2.
HGI Requirements	Sanitation district policies shall include the requirements of Section 5.3.
Best Management Practices (BMPs)	Sanitation district policies shall include the requirements of Section 5.4.
Spill Prevention	Sanitation district policies shall include the requirements of Section 5.5
Enforcement	Sanitation district policies shall include an enforcement element including routine inspections and required actions for violations that adequately protect the publicly owned sanitary sewer.

6.0 Enforcement

The Division has the authority to enforce Pretreatment requirements both criminally and civilly as determined in City Municipal Code. Upon inspection of a user's GGI and/or BMPs, the user will be given a copy of the inspection form. The inspection form will contain the inspection results and will indicate the deadline for any corrections if necessary.

Required time frames for violations are as follows:

- Repairs to grease removal device must be completed within fifteen (15) calendar days;
- Pumping requirements must be completed within five (5) calendar days;
- Missing drain screens and WGBs must be replaced within ten (10) calendar days;
- Spills or leaks around WGBs shall be cleaned-up within 24 hours;
- Missing kitchen signage must be immediately replaced; Violations involving improper employee BMP adherence shall require retraining of the employee and documentation of such training to be post marked, hand delivered, or emailed to the Control Authority within five calendar days; and
- Records, receipts, and/or manifests of GGI and WGB maintenance not available for review upon inspection must be provided to the Control Authority within 5 days.

If a user fails to make the corrections within the required time frame, the user will be referred to the enforcement authority. Fines and/or re-inspection fees may be levied as an enforcement action. If non-compliance continues the enforcement authority may escalate enforcement actions that could include both civil and criminal actions. The Control Authority has the authority to perform work or hire a contractor to perform work necessary to bring a user into compliance. Costs associated with work including labor, equipment, and materials incurred in rectifying the non-compliance shall be billed directly to the user and the total charges due shall constitute a lien on the user until paid in full.

The Division is obligated under federal regulation to enforce against violations pursuant to its Enforcement Response Plan. Noncompliance will result in enforcement actions based on a number of factors including harm to the environment or personal property, harm to the WWTP system or plant operations, pass through, interference, and worker or public safety.

7.0 References

Englewood Municipal Code 12-2-5

Littleton Municipal Code 7-5-25

Uniform Plumbing Code 2009

CDPHE Waste Grease Regulations 6 CCR 1007-2 Part 1 Section 18
<http://www.colorado.gov/cs/Satellite/CDPHE-HM/CBON/1251616361896>

8.0 Review and Revision Schedule

This procedure shall be reviewed, and revised if necessary, every two years or more frequently.

9.0 Approval and Issuance

This procedure has been approved and issued by the SPWRP Pretreatment Administrator.



Signature:

Date: August 19, 2016