



FOG Ordinance

Focusing on "The Problem"

DWSD Regulatory Model

Local Ordinance

- DWSD Requirements – System Based
 - Protect WWTP
 - Protect Collection System
 - NPDES Permit Compliance
 - Health & Safety
- Local Requirements – Local Issues
 - FOG Controls

Controlling FOG

- Command & Control Methods
 - Ordinances & Rules
 - Programs
- Voluntary Methods
 - Logical & Beneficial Program Extensions
- Education Methods
 - Transfer scope of problem through notice
- Regulatory Lapse
 - Public Health/Bldg. Permits/Sewer Authority

Command & Control

- Local Discharge Pollutant Limitations
 - Applicable to Commercial & Industrial Flows
 - Current DWSD Limit = 1,500 mg/l
 - Approx. 48,000 lbs/day from Domestic-Residential
 - Availability of 350,000 lbs/day
 - Prohibition of flammable discharges
 - (LELs, Flashpoint)
 - Prohibition of Nuisance
 - Prohibition against System/Treatment Interference
 - Prohibition against System/Treatment Pass-through
 - Prohibition against “floating” oils that interfere

Command & Control

- Economic Fee – acts as disincentive to discharge
 - Detroit System required to distribute costs proportionately among user classes
 - Those who use more pay more
 - Surcharge Program developed in 1981 to balance costs from Industrial & Commercial
 - BOD, TSS, Phosphorus, FOG
 - FOG = \$ 0.164/lb (for 2006/07)
 - Excludes Restaurants
- Clean-up/response costs recovery

Voluntary Methods

- Focus on Restaurants (Franchises, Institutions, Grills)
 - Establishments often cluster, impacting local sewers
 - Difficulty in identifying “sole” source
 - Grease controls – mixed
 - Grease trap requirements – sizing & maintenance
 - Garbage disposers, dishwashers – effectiveness of traps

Education

- Pollution Prevention Approach
 - Provide notice of problem
 - Transfer duty to prevent
 - Development of maintenance plans and responses to “Manage” FOGs
- Identifies “problem” for restaurant industry to focus upon
 - Video/CD (5 minute information)
 - Posters (Do and Don’ts)

Conclusion

- Ordinance option – requires permit and enforcement mechanisms
- Economic options – connects FOG problem to profitability
- Voluntary options
 - Well received
 - Results difficult to measure
 - Effectiveness – Notice of Problem, Awareness of Issue