

FATS, OILS & GREASE REGULATION UPDATES

FACT SHEET

Keeping Fats, Oils, and Grease (FOG) Out of the Sewer System

Food service establishments (FSEs) are required to control discharge of fats, oil, and grease to the publicly owned sewer system. The LOTT Clean Water Alliance and its partner jurisdictions, the cities of Lacey, Olympia, and Tumwater, and Thurston County, manage and operate the sewer system. LOTT is proposing changes to its discharge regulations to update rules for grease interceptor maintenance.



Grease-laden wastewater, generated when preparing food and washing dishes, can constrict or even block sewer lines if the wastewater is discharged directly to the sewer system.

FSEs generate grease-laden wastewater when preparing food and washing dishes. If this wastewater is discharged directly to the sewer, grease can constrict or even block sewer lines, causing the sewer to overflow. This can disrupt business operations and create a hazard to public health and the environment.

FOG Program Requirements & Updates

LOTT is required by the Washington State Department of Ecology (Ecology) to establish a program for managing fats, oils, and grease. FOG programs help prevent grease-related sewer overflows by requiring commercial facilities that produce FOG to install and maintain grease interceptors. LOTT establishes rules for sewer discharge, which are included in partner city sewer use ordinances. These rules ensure businesses

maintain devices to remove grease and prevent sewer overflows. Ecology reviews LOTT's program to ensure it meets federal Environmental Protection Agency (EPA) requirements and protects the wastewater collection system and treatment plants.

LOTT is updating the rules for grease interceptor maintenance because current regulations are insufficient. Prior to initiating these changes, LOTT inspected FSEs to observe how grease interceptors were maintained, and to identify common deficiencies. LOTT also reviewed sewer use ordinances from other Washington municipalities to develop a program based on proven methods.

FSEs are encouraged to review the proposed changes and provide feedback before local ordinances are updated with new FOG control rules. Your input is important. Please send comments regarding these changes to pretreatment@lottcleanwater.org.

Changes Proposed in Ordinance Revisions

The new rules would establish required frequencies for cleaning grease interceptors. They would also allow cleaning frequencies to be adjusted according to the rate of grease build-up in the FSE's interceptor.

Proposed changes are intended to help FSEs meet new requirements. Changes include:

- **Creating uniform standards for how to maintain grease interceptors and how often to have them cleaned.** Cleaning frequencies can be increased or decreased based on how much grease and sediment is filling the grease interceptor.
- **Requiring FSEs to ensure their grease interceptor is cleaned at the needed frequency.** FSEs may choose to contract with a grease pumper service for cleaning.
- **Requiring businesses to report maintenance activities.** This requirement is not new; it is an existing rule that will be applied once the ordinance is passed.
- **Establishing a Certified Pumper Program.** This program is to help FSEs choose a qualified grease pumper and to streamline reporting requirements.

These proposed ordinance revisions do not require capital upgrades. They do require proper maintenance of grease interceptors and reporting service records. The need for grease interceptor maintenance is a function of how much food waste is put down the drain. Keeping grease out of the drain saves money on interceptor maintenance.

Certified Pumper Program

Grease pumpers service grease interceptors and are a key part of FOG management. For this reason, LOTT is establishing a Certified Pumper Program. This Certified Pumper Program is intended to help FSEs choose a qualified grease pumper and to streamline reporting requirements. Certified pumpers would be trained in proper grease interceptor maintenance and would be allowed to submit required maintenance reports on behalf of the FSE.

The FSE is responsible for maintaining grease interceptors and submitting reports to LOTT. However, a certified pumper can help simplify the process.

Facility Inspections

FSEs that regularly maintain their grease interceptor and comply with reporting requirements may be inspected less often than non-compliant facilities. LOTT can prioritize facility inspections for FSEs that are not submitting reports, an indication they might not be cleaning their interceptor.

Frequently Asked Questions

What are Food Service Establishments (FSEs)?

FSEs include any type of nonresidential facility where food is prepared or served, including:

Restaurants	Grocery stores
Delis	Bakeries
School cafeterias	Assisted living centers
Hotels	Catering services
Food trucks	Houses of worship

What is the problem with grease in wastewater?

If greasy wastewater is discharged directly to the sewer, it can constrict or even block sewer lines, causing the sewer to overflow. This creates a hazard to public health and the environment and can subject LOTT to costly fines from the Department of Ecology.

Are public utilities responsible for maintaining the sewer systems?

Public utilities maintain the sewer system and they are federally required to adopt regulations for businesses that discharge waste to the sewer. By law, LOTT and its partner cities may not allow businesses to discharge fats, oil, and grease (FOG) to the sewer, even with regular cleaning of the sewer lines.

Will LOTT or the city pay for grease interceptor maintenance?

No, businesses are responsible for maintaining their grease interceptor, just as they must pay to install and maintain a dumpster for solid waste. The business that generates the grease pays the cost of grease management.

What harm can result from not maintaining a grease interceptor?

- Grease can pass into the publicly owned sewer and constrict the line, causing a sewer overflow.
- Clogs can cause wastewater to back up inside the FSE, resulting in closures, or a threat to public health if the FSE continues to serve food during a back-up.
- Blockages in FSE drain pipes must be cleared by a plumber, which results in added costs for the FSE.
- Corrosion to the interceptor can occur as a result of poor maintenance. This can result in extra costs for repairing or replacing the interceptor.

How long before businesses must comply with the new rules?

- The rules will become effective once the ordinance is passed. During the first year, LOTT's efforts will focus on education and outreach. FSEs will be notified of the new rules and provided with recommended practices to reduce the need for cleaning grease interceptors.
- During this phasing-in period LOTT will use discretion on enforcement, giving priority to referrals from partner cities that note excessive grease in the sewer or grease interceptors that are not being maintained adequately.
- After the phasing-in period, businesses will need to adhere to the new rules or be subject to enforcement actions. The first step in LOTT's enforcement is to inform the business of applicable rules and allow them to make necessary changes. If the business does not comply, enforcement is escalated, which could result in fines, and ultimately discontinuation of water service.

Good business practices result in cleaner waterways. LOTT and partner jurisdictions work with local businesses to promote clean water in our communities.

What are requirements of the proposed ordinance revisions?

- FSEs must maintain their grease interceptor every 14 or 90 days, depending on the size and type of interceptor.
- The use of grease-dissolving additives in lieu of maintenance is prohibited.
- Grease interceptor maintenance must be documented and reported to LOTT, and records must be kept onsite.
- Garbage grinders may no longer discharge directly to the sewer or to small grease interceptors. They must be permanently removed, or connected to a gravity grease interceptor.

Why do hydromechanical grease interceptors (aka grease traps) need more frequent cleaning?

These grease interceptors are smaller and not designed to store large amounts of grease, so they must be cleaned frequently to work properly.

Are LOTT's ordinance revisions flexible?

The ordinance revisions allow flexibility for FSEs to:

- Adjust their cleaning frequencies based on the amount of grease build-up.
- Clean their own small grease interceptors, rather than paying a pumper for every clean-out.
- Use the manufacturer's recommendations for cleaning higher capacity grease interceptors. This allows users to avoid cleaning them before needed.

For More Information

- **LOTT's Pretreatment Regulations** are located at lottcleanwater.org/library/rules-and-regulations.
- **For additional questions** about LOTT's Pretreatment Program, email pretreatment@lottcleanwater.org or call (360) 528-5728.