

**Louisville and Jefferson County  
Metropolitan Sewer District  
Fats, Oils & Grease (FOG) Management Policy**

**Adopted: May 27, 2008**

**Purpose:**

The purpose of this policy is to protect the Metropolitan Sewer District (MSD) collection system, pumping stations and treatment works from the discharge of excess fats, oil and grease (FOG) by ensuring that Food Service Establishments (FSE) are in compliance with the requirements of the Wastewater/Stormwater Discharge Regulations (WDR), as well as commitments made by MSD in the Capacity, Management, Operations and Maintenance (CMOM) Self-Assessment conducted under MSD's Consent Decree signed by MSD, the Environmental Protection Agency (EPA) Region 4 and the Kentucky Department of Environmental Protection (KDEP), in August 2005.

The accumulation of FOG in the collection system causes blockages which may lead to Sanitary Sewer Overflows (SSO). SSOs can lead to the degradation of water quality in the receiving waterbody, adversely impact MSD's operations and cause violations of the Clean Water Act (CWA) and/or the provisions contained in the Consent Decree. FOG blockages may also cause sewer back-ups into homes and businesses thereby causing property damage and disrupt business activities.

**Authority:**

The intent of this policy is to authorize MSD staff to establish clear design standards and/or procedures and/or guidelines to regulate FSE operations, as well as the disposition of FOG wastes pumped from FSE Grease Control Equipment (GCE) during routine maintenance. The authority for this policy is contained in MSD's Wastewater/Stormwater Discharge Regulations (WDRs). Enforcement actions taken under this policy will be in accordance with MSD's Enforcement Response Plan (ERP).

**Pretreatment of Wastewater**

FSEs shall install and maintain appropriately sized GCE in accordance with the provisions of this policy and its related design standards, guidelines and/or procedures. GCE shall be installed, operated, properly maintained and repaired at the sole expense of the FSE owner/operator.

**Schedule for Compliance with the FOG Management Policy:**

As users discharging to MSD's sewer system, FSEs shall comply with all requirements of the WDRs.

FSEs discharging to the MSD collection system are subject to the FOG Management Policy and related design standards and/or procedures and/or guidelines, as well as the MSD ERP.

New construction of FSEs, shall be in full compliance with the policy before commencing operations. New construction of FSEs shall have separate sanitary (restroom) and kitchen process lines. The kitchen process lines shall be plumbed to appropriately sized GCE.

New multi-unit facility, or new “strip mall” facility, owners shall have plans for separate private wastewater lines for kitchen and sanitary wastewater for each “individual” unit. In addition, the plans shall identify “stub-out” locations to accommodate a minimum 1,000 gallon grease interceptor for each unit of the multi-unit facility. New multi-unit facility, or new “strip mall” facility owners shall consider suitable physical property space and sewer gradient that will be conducive to the installation of an exterior, in-ground GI when determining the building location. New multi-unit facility, or new “strip mall” facility, owners shall contact MSD prior to conducting private plumbing work at the multi-unit facility site to ensure this construction meets the intent of this policy.

FSEs undergoing extensive remodeling shall be in full compliance with the policy before recommencing operations after the remodeling work is completed.

FSEs in existence prior to the effective date of this policy may be allowed to continue current operations without significant modifications until such time as:

1. extensive remodeling is performed at the FSE facility, and/or
2. the facility’s existing GCE is deemed to be of substandard size and/or design, and/or
3. the FSE is shown to be the cause of a FOG blockage in MSD’s collection system.

Existing FSEs found to be in noncompliance with this policy will be subject to the provisions of the ERP and shall be required to take immediate action pursuant to this policy and/or related procedures and/or guidelines.

MSD’s Regulatory Services Division (RS) and/or Legal Counsel or their designees will make the determination of whether a FSE has caused or contributed to a blockage in the collection system, as well as what actions will be required of the FSE to return to compliance.

#### **FSEs Responsibilities:**

1. GCE design and construction plans shall be submitted in accordance with MSD Plumbing Plan Review requirements. The pertinent plan sections/pages will be reviewed and approved by MSD’s Industrial Waste Department (IWD).
2. GCE shall meet the requirements for GCE contained in MSD’s Design Manual. **See attachment 1.**
3. Waste and/or wastewater removed from FSE GCE shall be disposed of at a properly permitted facility that is authorized to accept such waste/wastewater in accordance with applicable federal, state and local laws and regulations. Waste/wastewater removed from GCE shall not be discharged to a private or public sewer unless permitted to accept said waste/wastewater.
4. FSEs shall not discharge FOG in amounts that cause a violation of MSD’s WDRs;

Article 2 Wastewater Limitations; Section 2.01 Prohibited Discharges – Public Sewer, Section 2.02.1 Specific Discharge Limitations, or Article 5 Stormwater Discharges; Section 5.06 – Improper Disposal.

5. FSEs shall provide facilities and institute procedures in accordance with MSD's FOG Management Policy and/or procedures and/or guidelines as are reasonably necessary to prevent or minimize the potential for accidental discharge of FOG into the sewage collection system. This includes implementation of "Best Management Practices (BMP)" protocols.
6. All FSEs in the MSD jurisdiction shall have a MSD certified grease waste hauler or plumber complete a grease interceptor (GI) certification annually.
7. "Additives" shall be prohibited for use as grease management and control except as described in MSD's **Fats, Oils & Grease Management Guidelines**.
8. FSE facilities that close for business shall completely pump out all GIs on the premises and shall fill the GI with water. Pumping of the GI prevents odors and deterioration of the GI from the weak acid FOG wastewater. Filling the out of service GI with water provides weight for the GI not to shift position, and provides a barrier from exposure to further deterioration.

#### **MSD Responsibilities:**

1. MSD staff will develop and maintain definitions, design standards and/or procedures and/or guidelines that are consistent with this policy.
2. MSD may issue FOG permits to FSEs to control FOG discharges to the MSD sewer system, prevent obstruction and interference to MSD's collection system, pump stations and/or treatment plants, as well as prevent sanitary sewer overflows. MSD may establish FSE FOG permit classifications, or issue general FOG permits to FSEs.
3. MSD may require that the FSE install monitoring equipment and/or additional GCE deemed necessary for compliance with this policy, and/or related design standards, procedures and/or guidelines and/or the WDRs.
4. MSD, and/or their authorized representative, may conduct inspections of FSEs for GCE installation and maintenance, review of best management practices, and to gather information regarding FOG discharge impacts.
5. MSD, and/or their authorized representative, has the right to enter the FSE's premises to determine impacts to the MSD sewer system.
6. MSD and/or their authorized representative may conduct monitoring of the effluent from FSE GCE for the purpose of determining compliance with this policy and/or related procedures and/or guidelines and/or MSD's WDRs and/or to assess a surcharge to the FSE.
7. MSD may charge inspection, monitoring, assessment, impact, and if applicable, permit fees to FSEs to obtain reimbursement for FOG program costs.

8. MSD will administer a Certified Hauler/Plumber Program that includes training for those entities that pump, transport and dispose of FOG- waste/wastewater from FSEs.

**FSE GCE Haulers and Plumbers Responsibilities:**

1. Haulers/Plumbers wishing to participate in the Certified Hauler/Plumber Program shall:
  - Participate in certification classes conducted by MSD in order to become a listed “approved Hauler/Plumber” by MSD.
  - At MSD’s request, submit specific information regarding FSEs to be submitted in a format specified by MSD.