

RWRA Fats, Oils, and Grease Management Policy



What you need to know:

At a Glance

- Effective July 1, 2023
- Applies to food service establishments connected to RWRA sewer system
- Existing Food Service Establishments will need to be in compliance once one of the following conditions are met:
 - Remodeling or Change of Use
 - Grease Control Device is substandard size, design, or in need of repair
 - There is evidence that the establishment's discharge of FOG may impair the collection system
- RWRA Inspector(s) will conduct an inspection on a routine basis

What is the Fats, Oils, and Grease (FOG) Policy?

- A policy that clearly states the purpose, authority, specifications, and enforcement escalation for RWRA to monitor operations regarding wastewater from Food Service Establishments
- Purpose – decreasing the volume of fats, oils, and grease in the RWRA collection system
- RWRA will be voluntarily enacting the RWRA FOG Management Policy in our service area **effective July 1, 2023.**



Why is FOG a **Problem**?

- Causes plumbing backups which could lead to blockages and sanitary sewer overflows
- Increases sewer cleaning and maintenance costs
- Reduces sewer pipe life
- Reduces pipe capacity

Sanitary Sewer Overflows

- Expensive clean up
- Health risks
- Negative impacts on businesses
- Environmental impacts
- FOG is the single largest contributor to overflows across the country



What can RWRA do to prevent overflows?

REACTIVE

- Sewer line cleaning, maintenance & inspections

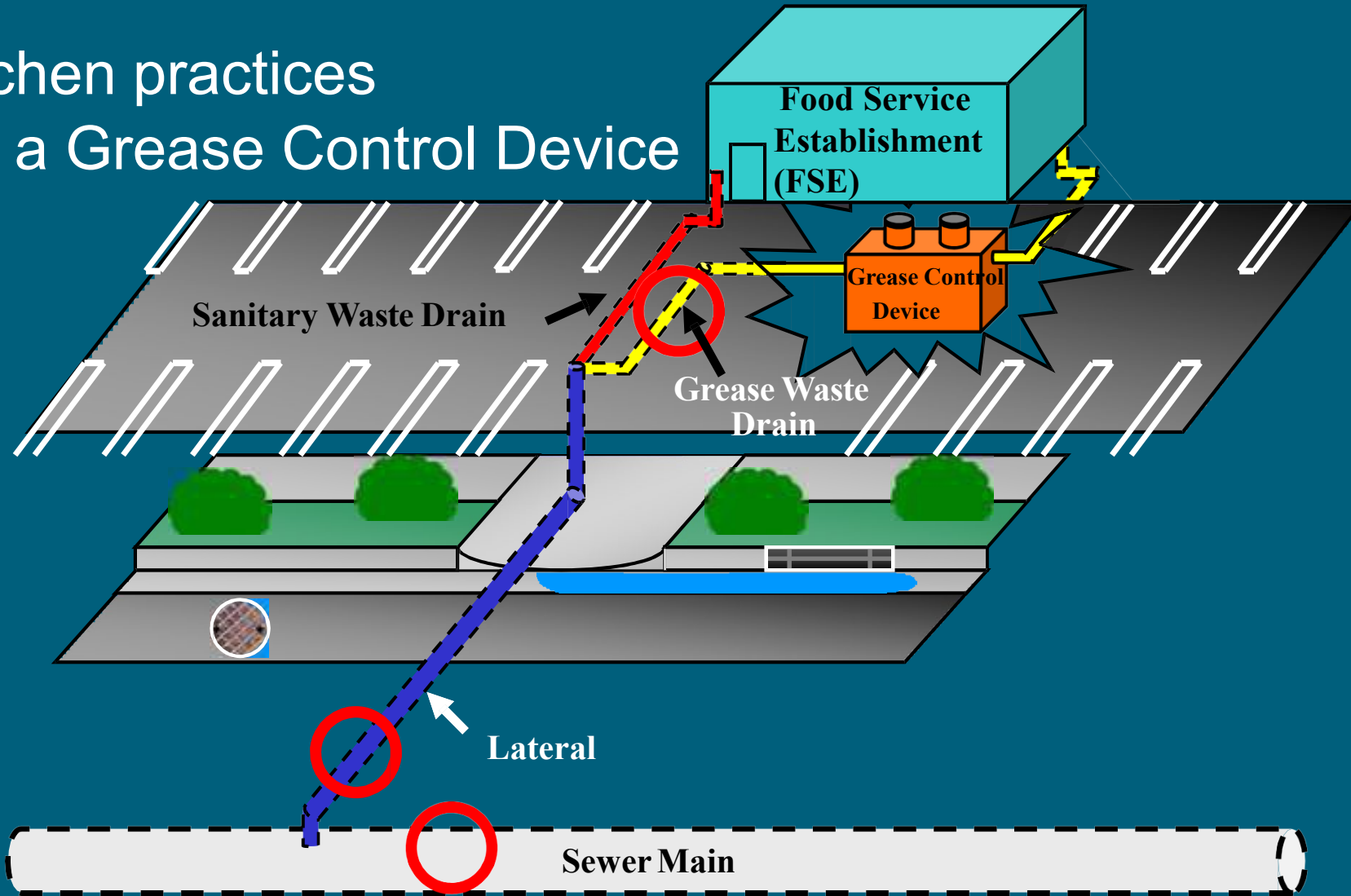


PROACTIVE

- Enforce regulations and educate on ways to control FOG at the source
 - Industrial
 - Commercial / Food Service Establishments
 - Residential

Ways to control it from the source

- Good kitchen practices
- Installing a Grease Control Device



RWRA developments involving FOG control

- 2004 – first FSE Inspections
- 2013 – permitting and certification of Hauled Waste Generators
- 2021 – Wastewater User Regulation referencing FOG Management for commercial users
- 2023 – FOG Management Policy



Highlights of the Policy

- Authority – Wastewater User Regulation and RWRA Pretreatment Regulation
- Enforcement Structure – RWRA Enforcement Response Plan
- Effective July 1, 2023
- Schedule for Compliance Food Service Establishments
 - New – full compliance before opening
 - Existing – Remodeling, change of use, substandard size, design, in need of repair, evidence that they may impair the collection system
- All kitchen process lines connected to Grease Control Device
- Prohibit Additives
- Prohibit Garbage Disposals
- Mobile Food Unit – identify where they will be discharging holding tank water. Encourage commissary option.
- Grease Control Device
 - Establish a pumping frequency that is *no more* than 90 days between pump outs
 - Utilize forward-facing software (SwiftComply) to track pump outs and allow for efficient communication means
 - Encouraging Grease Control Devices that are tested and certified to grease capacity by using a specified sizing method

Best Management Practices



Good To Do

- Educate and train kitchen staff on grease control
- Use of strainers in sink drains
- Pre-scrape and dry wipe all pots, pans and plates prior to washing
- Vent hoods, floor mats and grills should be cleaned in sinks that flow to Grease Control Device
- Have oil spill kits on hand and train staff when to use

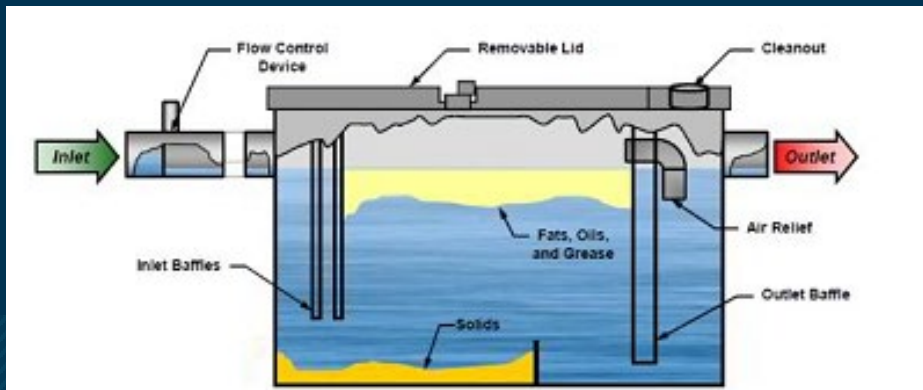


Not To Do

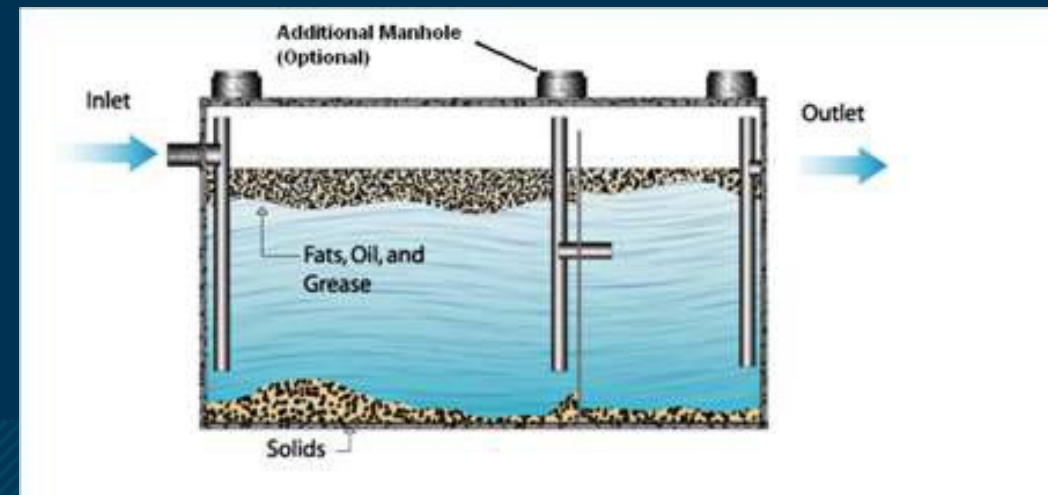
- Don't assume kitchen staff inherently knows the importance of proper FOG disposal practices
- Never pour cooking residue directly into the drain
- Never dispose solid food waste into garbage disposal or sink
- Never wash vent hoods, floor mats or grills where water can run off into storm drain
- Never use additives such as emulsifiers, acid enzymes, caustics to "break down" FOG

Grease Control Devices

- Hydromechanical Grease Interceptors
 - Interceptors that have been third-party tested and certified to hold a certain capacity of grease.
 - Capacity is measured in flow rate and grease capacity in pounds
 - Smaller in size
 - Higher grease holding capacity due to the **engineered-specific** flow patterns
 - Typically made of plastic (polyethylene), fiberglass, or steel



- Gravity Grease Interceptors
 - Interceptors that have not been third-party tested and certified
 - Capacity is measured by how much liquid the tank can hold (gallons)
 - Work by being a significantly larger size, allowing more residence time for the contents so that **gravity** can work to separate the contents. The standard residence time of 30 minutes.
 - Typically made of concrete

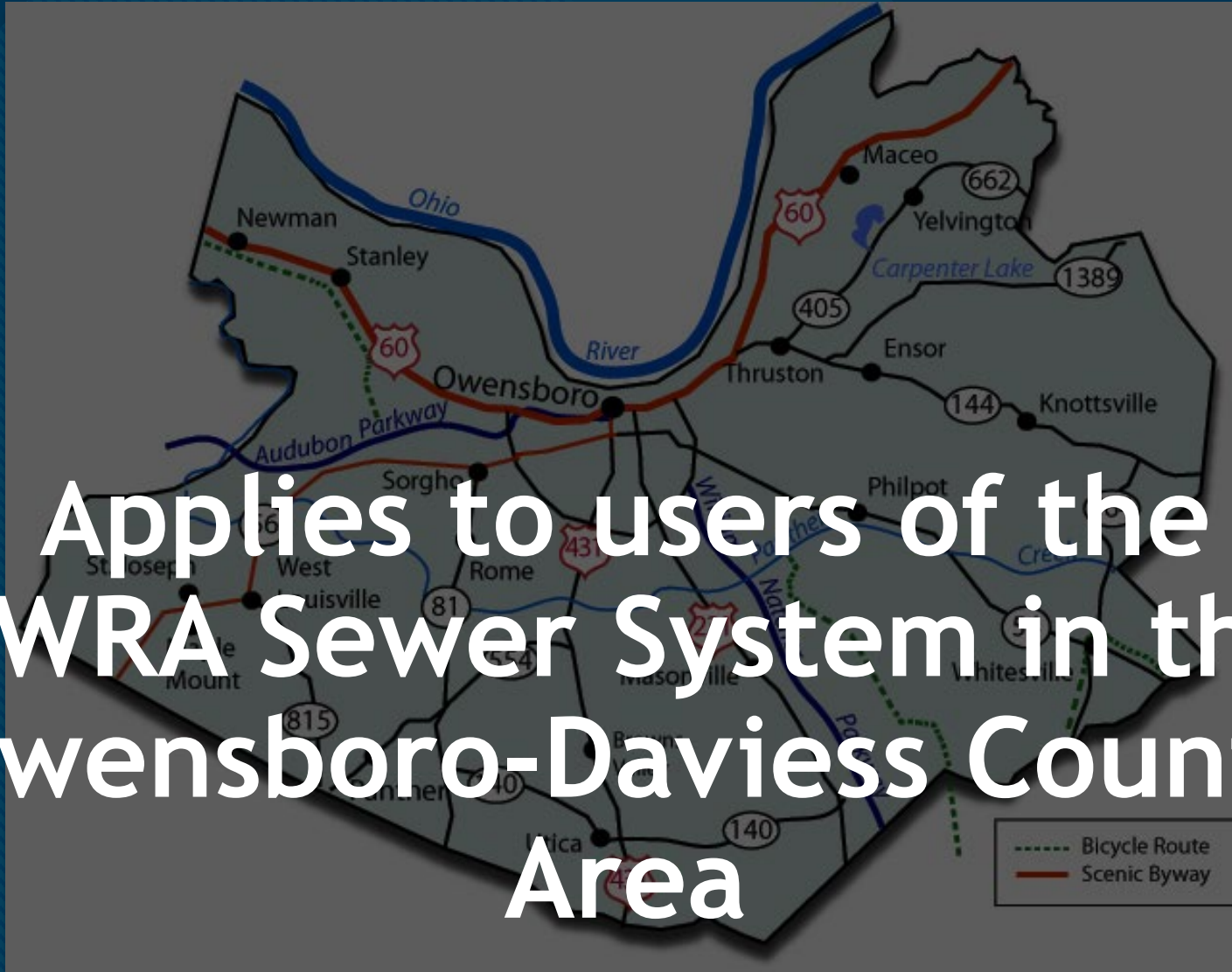


Routine FOG Inspections



- Inspections conducted on an annual basis
- Provide FOG outreach/education to Food Service Establishments
- Verify implementation of good kitchen practices
- Verify maintenance condition of the Grease Control Device

Applies to users of the RWRA Sewer System in the Owensboro-Daviess County Area



Policy's Long-term Aim



Continually obtaining current data on FSEs through the use of forward-facing software



Phased approach

1. Initial inspection/inventory
2. Utilize software for efficient permitting process with online application and payment processing
3. Create strong hauler program, training them to conduct inspections
4. Residential awareness, FOG containment distribution



More of a presence in the FSEs



Educating FSEs on the right thing to do and why it matters



Utilizing data collected from RWRA field staff to measure the success of the program in terms of time and money saved by focusing on FOG collection at the source.

Official FOG Management Policy
document can be found on our
website

Q&A

Contact Morgan Brown
270-297-9014
Morgan.Brown@rwra.org

Follow Regional Water Resource Agency on
or visit www.RWRA.org

