FY24 HAULER TRAINING



Agenda

Introduction

IDC

FOG

Wrap-up



Important note about this presentation

• The manufacturers, contractors, suppliers or any other vendors or commercial entities seen in this presentation are for illustrative purposes only and are not to be interpreted as recommended, allowable or otherwise approved equipment or vendor by the presenter of this training. (i.e. they just happened to be in the action when the photo was taken ©)



Hauler Training 2023

- This session will discuss the Industrial Discharge and FOG (Fats, Oils and Grease) Programs in relation to the septage and grease hauling/disposal industry and WSSC officials. Productive past practices and processes will be highlighted for review. Input from attendees was requested prior to this session via email. We will also try to answer emails during this presentation FOG_unit@wsscwater.com
- This will usually be an annual process for all haulers within the WSSD.



PRE-TRAINING NEWS AND NOTES

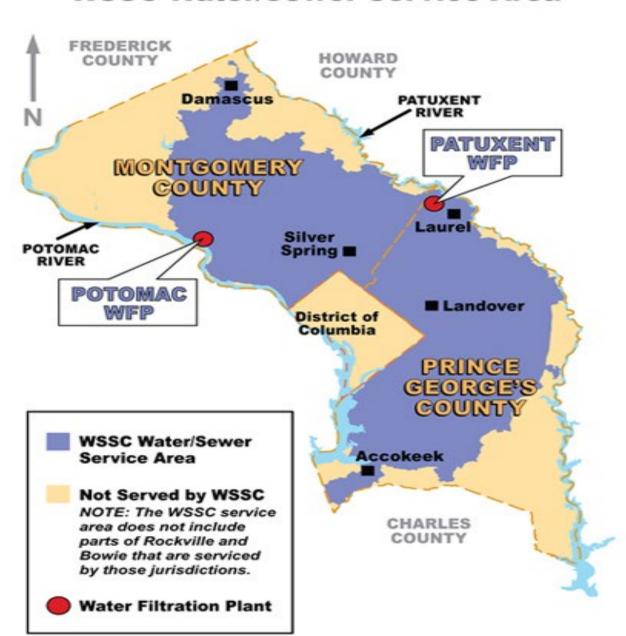


If the FSE (Food Service Establishment) is within this service area, a WSSC grease manifest is required*, regardless of disposal site chosen

*minor exceptions for disposal outside of Muddy Branch apply



WSSC Water/Sewer Service Area



FY24 Waste Hauler Permit renewal was due by 7/14/2023





Fee/Charge Number and Name DISCHARGE AND WATER PROTECTION	A STATE OF THE PARTY OF THE PAR	Y 2024 pproved
8 Septic Hauler Discharge Permit Fees		
Category I - Residential & Septic Waste & Grease I-49 gallons (per vehicle)	\$	255
50-799 gallons (per vehicle)		7,425
800-2,999 gallons (per vehicle)		21,175
3,000 gallons & up (per vehicle)		42,050
January thru June (50% of fee)		50% of fee
Transfer and/or Replacement Permit Sticker		170
Industrial/Special Waste Disposal Fee (per 1,000 gallons)		400
Zero Discharge Permit Fee		170
Temporary Discharge Permit Fee plus sewer rate per 1,000 gallons		220
Sewer Rate - Hauled Waste (1,000 gallons of truck capacity)		50
Sewer hate - Hadied Maste (1,000 gailons of cruck capacity)		

Sewer Rate - Hauled Waste (1,000 gallons of truck capacity)	50
Temporary Discharge Permit Fee plus sewer rate per 1,000 gallons	220



Updates to General Conditions of Waste Hauler Permit Grease Cleaning Procedures



A permittee engaged in the business of cleaning grease interceptors and grease traps shall observe the following procedures:

- a. Digital, date stamped photographs are required to be taken as evidence of the work completed. Maintain the photographic records for three (3) years at your place of business. All photos must be date and time stamped with the location accurately documented. Photographs are to include, at a minimum.
 - 1) The site, location of interceptor with manhole covers still installed.
 - 2) All compartments of the grease interceptor emptied,
 - The site with the interceptor lids reinstalled.
 - 4) If an interceptor is found to be defective upon removal of manhole covers, photos must be taken to clearly identify the deficiency (for example: the contents of interceptor are above the inlet and/or outlet of piping in the interceptor, signs of surcharging, inlet/outlet diffuser baffles broken, or concrete baffle walls collapsed).
- b. Remove all manhole lids or access panels. Interceptors may have multiple compartments and manhole access openings. Assure all traffic, worker, and pedestrian control safety measures are understood and followed.
- c. Begin the cleaning procedure from the <u>inlet</u> end or <u>inlet</u> compartment using the following general sequence:
 - 1) Remove the floating grease layer first.
 - Scrape grease adhering to the interceptor or grease trap walls where accessible.
 - As the water level is reduced to the sediment level, pull sediment toward the vacuum hose, removing all sediment.
 - (a) If it becomes necessary to add water back into the interceptor, add only enough to create sediment slurry.
 - (b) Vacuum each compartment until completely empty.
 - (c) Flexible hose or a fixed stainless steel or PVC pipe (or wand) approximately the same diameter as the intake hose is permissible as long as it can safely maneuver in or throughout the interceptor.
 - 4) Repeat the above procedure as necessary from each manhole or other access opening so that, when completed, the *entire* interceptor has been left "clean" and empty.
 - 5) Notify the property owner that the interceptor or trap requires power cleaning at the first occurrence of either of the following intervals:
 - (a) Annually, or
 - (b) When the build-up of solids and grease on the walls or baffles becomes significant or interferes with the operation of the interceptor or trap.
 - 6) Returning wastewater to the interceptor is prohibited except for cleaning purposes identified in section B.12.c.3(a). Waste haulers providing "pump and return" cleaning service, which results in wastewater being returned to the interceptor, must have prior written approval by WSSC Water.



Continued

- 7) If the interceptor or trap is not functioning properly due to defective or missing pipes or components, or if the interceptor or trap is leaking, the permittee shall report these findings on the manifest form and report via email notification within 5 business days for faulty interceptors or traps to WSSC Water's Fats, Oils, and Grease Section at FOG Unit@wsscwater.com.
- If the trap or interceptor is causing an environmental or sanitary impact, i.e. overflowing or about to overflow, the waste hauler shall perform the following notification steps;
 - (a) Notification to the property owner or tenant that is responsible for the interceptor noting they need to call a plumber to inspect and service the piping to and from the interceptor
 - (b) Document the issue on the grease manifest and include whom the information was discussed with at the FSE directing them to contact a licensed plumber to clear any stoppages causing the interceptor to overflow. See note 2 below.
 - (c) Copy of manifest must be emailed to FOG_Unit@wsscwater.com identifying the issue within 24 hours, next business day.

NOTE:

- Waste Haulers that do NOT have at a minimum a WSSC Drain Cleaners License are prohibited from clearing backups, jet cleaning, or camera inspection of in the inlet piping system to the interceptor and the outlet piping system to the building sewer. Waste Haulers that do NOT have a WSSC Drain Cleaners, may only clean the inside of the interceptors.
- 2. The property owner shall employ, at the property owner's sole expense, a WSSC-Licensed Master Plumber or a WSSC-Licensed Sewer and Drain Cleaner to clear the stoppage, from the building to the Commission's sewer main as set forth in WSSC Code Section 102.3.6.2. If the stoppage was caused by a defective building sewer, or by a defective connection at the joint connecting the private sewer to the Commission service connection, the property owner shall be responsible for hiring a WSSC-Licensed Master Plumber to correct the problem at the property owner's expense.
 - a. If an obstruction causing a stoppage is located in the Commission's service connection, the WSSC-Licensed Sewer and Drain Cleaner shall notify the Commission's Emergency Call Center by telephone, fax, or electronically within 72-hours.
 - b. If the stoppage was not cleared, the WSSC-Licensed Sewer and Drain Cleaner shall notify the Commission by telephone immediately. The WSSC-Licensed Sewer and Drain Cleaner shall also inform the Commission of what the WSSC-Licensed Sewer and Drain Cleaner believes caused the obstruction e.g., a soft stoppage, broken or misaligned piping, roots, grease, debris, or other cause.





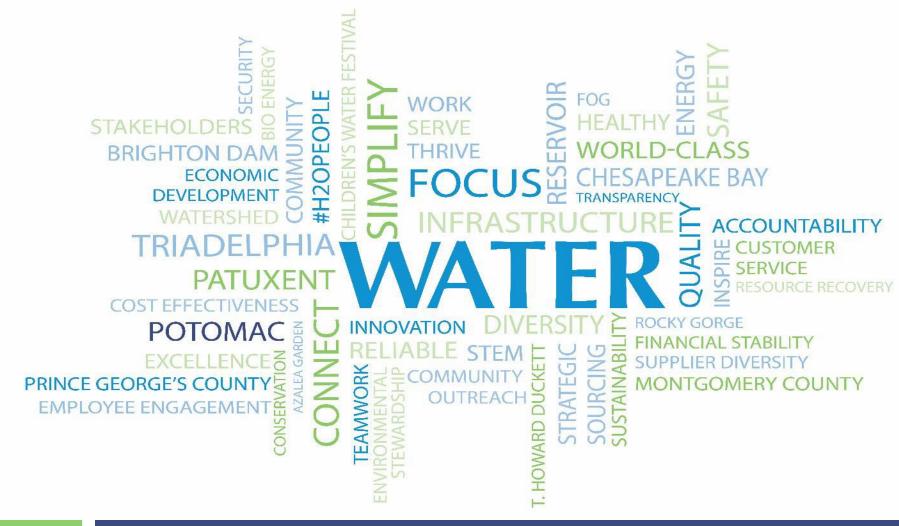
Coming in February 2024

New Digital Processes That Are Being Developed:

- 1. Digital Waste Hauler Grease Manifest
- 2. Digital Waste Hauler Septage Manifest
- 3. Waste Hauler Vehicle Licensing (WSSC PERMIT)
- 4. Digital FOG Discharge Permit Application for new FSEs



Questions?





Scott Horn FOG Section Manager, WSSC john.horn@wsscwater.com

Industrial Discharge Control Program

And

Waste Haulers



IDC Program Objectives

To control pollutants from nondomestic sources which can:

- Pass-through the wastewater treatment plant processes;
- interfere with the operations of the treatment plant
- contaminate sewage sludge;
- damage the collection system; and/or
- be harmful to the workers at the treatment plants or in the collection system.



About the IDC Program

- WSSC Water has been delegated authority to administer the pretreatment program from MDE, who is delegated from EPA.
- All businesses located within WSSC Water's jurisdiction that generate nondomestic wastewater (known as industrial users) must comply with our Industrial Waste Regulations, Section 8 of the WSSC Plumbing and Fuel Gas Code.
- Under the non-domestic user permitting program, WSSC Water regulates
 Significant Industrial Users (SIUs), specific zero dischargers, temporary
 dischargers of metered wastewater, and waste haulers. All SIUs must apply
 for a WSSC Water Discharge Authorization Permit.
- All waste haulers using a WSSC Water disposal site or servicing an FSE within the WSSC Water jurisdiction must have a valid waste hauler discharge permit or zero discharge permit, respectively.



IDC PROGRAM PERSONNEL





Industrial Investigator Responsibilities Related to Waste Haulers/Others

- Review surveillance videos
- Enforce waste hauler requirements
- Collect manifests at disposal sites
- Randomly collect samples from waste haulers
- Attend court proceedings related to violations
- Answer questions related to sites, disposal practices, and prohibited discharges, etc.



Permit Services Section Responsibilities related to Waste Haulers / Others

- Issue waste hauler permits
- Collect permit fees
- Distribute septage and FOG manifests
- Review, verify, and process manifests
- Process civil citations and associated fines
- Answer general questions related to waste hauler permits

Any questions or for more manifests, please email: OneStopShop@wsscwater.com or call 301-206-4003



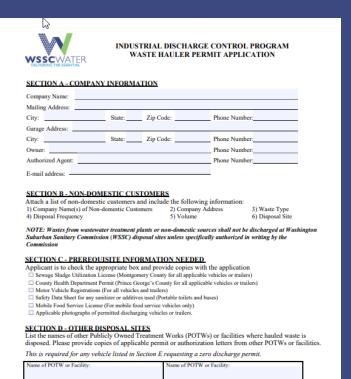
Applying for a Waste Hauler Permit

A hauler permit is effective July 1st or when issued, until the expiration date of June 30th (aligned with WSSC Water's Fiscal year).

- Haulers must apply every year for the fiscal year permit
- Permit fees (except zero-discharge permits and transfer fees) are pro-rated to half the rate after January 1st
- Application and permit guidance can be found at www.wsscwater.com/IDC

Can apply:

- In person 14501 Sweitzer Lane, Laurel, MD
- By mail
- Questions? 301-206-4003



☐ Are copies of other permits or authorization letters from other POTWs or facilities attached to this application?

Application Revised 6/2023



Items Needed to Obtain a Hauler Permit

- Completed application
- Vehicle Registration card(s)
- Montgomery and/or Prince George's County Health Department Permit(s)
- Photographs of vehicles to be permitted (first time permitted)
- Safety Data Sheet (if applicable)
 - Formaldehyde and 1,4 dichlorobenzene are prohibited
- Other POTW permits or facility authorization letters (Application Section D)
- Check or Money Order payable to WSSC



2012 DC Water Blue Plains Inter-Municipal Requirements

WSSC Water accepts septic or greasy wastes that originated from:

- Montgomery County
- Prince George's County
- Arlington County
- Fairfax County
- Loudoun County
- District of Columbia



2012 DC Water Blue Plains Inter-Municipal Requirements (con't)

- Greasy waste must be disposed of at Muddy Branch in Montgomery County
- Manifests are required for all hauled waste discharges
- Random sample collection of hauled waste
- Reminder: A copy of your WH permit and general conditions is required to be kept in each permitted vehicle/trailer and onsite at the company office



Manifesting Septic Waste





Most Prevalent Violations Committed by Waste Haulers/Others

- Discharging after hours
- Discharging without a hose and creating an unsanitary condition through spillage of waste
 - Required to notify WSSC of spills and clean up
- Failure to submit manifest (at time of disposal; 4 weeks from pump out for zero discharge permit holders)
- Incomplete manifests





Most Prevalent Violations Committed by Waste Haulers/Others (con't)

- Disposing waste from <u>unapproved</u> non-domestic customers, including, but not limited to, waste from automotive interceptors, breweries, wineries, distilleries, and meaderies
- Disposing waste with no and/or suspended permit
- Neglecting to maintain copies of Permit and General Conditions must be kept in the vehicle
- Disposing of hauled waste from outside the service area (Montgomery, Prince George's, Arlington, Fairfax, and Loudoun counties, as well as the District of Columbia)



A word about "intermediate" disposal PROHIBITED ACTIVITES



- A subcontractor truck to a permitted hauler vehicle.
- A zero discharge hauler to a full discharge hauler.
- GAD contents held at a site (tank, tanker, other containment) prior to 'ultimate' disposal
 - Tracking issues
 - Mixing issues
 - Liability issues
 - Health, sanitary, zoning or Code issues.



814.13 Disposal Sites. *Only* disposal sites designated by the Commission shall be used for the discharge of waste from a permitted vehicle into the Commission's sewer system.

Enforcement Actions

- A Notice of Violation (NOV) and a Civil Citation are the enforcement actions that WSSC Water will issue to the waste hauler.
- Citations start at (per violation type)
 - \$ 250 for the first offense
 - \$ 500 for the second offense
 - \$ 750 for the third offense
 - \$ 1,000 for any subsequent offenses





Where to get Additional Information about Disposals at Existing Sites

Contact the Permit Services Section Permit Agent at 301-206-4003

Or

Contact an Industrial Investigator or Supervisor

Marianna Eberle	301-206-8595	
Joseph T Miller	301-206-8590	>Montgomery
Jessica Macer	301-206-8592	
Alex DeWire	301-206-8504	
Todd Gentry	301-206-8506	
David Aries	301-206-8589	>Prince Georges
Brenden Hogan	301-206-7452	
Theresa Haas	301-206-8566	
Peter Holland	301-206-8629	



Any site updates or proposed plans for the Muddy Branch Road, Tanglewood Drive, or Ritchie Road Disposal Sites will be forwarded to you for your awareness using Constant Contact or regular email.

Muddy Branch continues to be the only WSSC Water grease waste disposal site



Next slides are a brief review of Montgomery County's Proposed Septic Tank legislation

No additional updates to forward to the hauling community



DEP WELL & SEPTIC SYSTEM MANAGEMENT PROGRAM

Septic Tank Pump Out Proposal

Mar. 12, 2021







ENVIRONMENTAL PROTECTION

Onsite Systems Management

Elements of this new program include:

- Proposed legislation for requiring the pumping of all septic tanks at least once every five years. Also proposed, will be a rebate that will partially cover the cost for the pumping.
 - Funding for the proposed pump-out rebate would come from the Water Quality Protection Charge.
 - The rebate would be available for each property only once every five years.
 - DEP plans to reach out to septic haulers to discuss increased demand for pump-outs and to WSSC to discuss additional use of its septage facility.
 - The septic tank pump-out would apply to all septic systems, regardless of age.

Onsite Systems Management

Septic Tank Pumping

- The Department of Permitting Services (DPS)
 recommends that septic system owners pump out
 their septic tanks at least once every two to five
 years, depending on usage.
- Similar programs in Maryland and across the country also use septic tank pump-out intervals of three to five years.

Questions?

Contact: Alan Soukup

Senior Planner, Intergovernmental Affairs Division alan.soukup@montgomerycountymd.gov 240-777-7716

Also see montgomerycountymd.gov/wellandseptic





Questions for IDC ???

Can always email the Industrial Discharge Control Section at:

IndustrialDischargeControl@wsscwater.com



FOG Section

- 1. About The FOG Program Will Hodges
- 2. Types of Grease Abatement Corey Norris
- 3. Grease Cleaning Procedures Mark Scholz
- 4. Waste Hauler Grease Manifest Scott Horn
- 5. Code Sections Sameer Ali
- 6. Confined Space Will Hodges

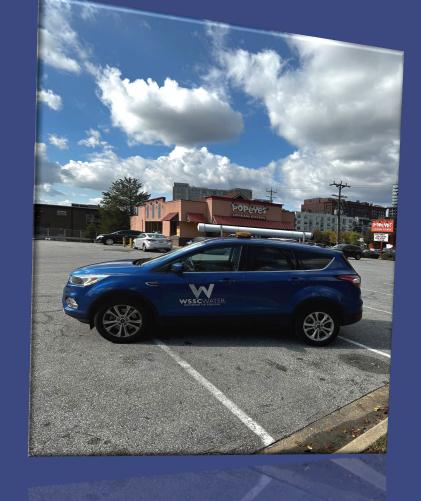




About The FOG Program

Will Hodges – FOG Supervisor Montgomery County





FOG General Email
FOG_Unit@wsscwater.com

DSD PERMIT SERVICES
301-206-4003
OneStopShop@wsscwater.com
(requests for manifests,
dropping off manifests)



FATS OILS AND GREASE (FOG) CONTACTS

Montgomery County			
FOG Investigations Supervisor Will Hodges	Will.Hodges@wsscwater.com	301-206-8250	
FOG Investigator Robert Edmands	Robert.Edmands@wsscwater.com	301-206-8527	
FOG Investigator Robert Morgan	Robert.Morgan@wsscwater.com	301-206-8599	
FOG Investigator Corey Norris	Corey.Norris@wsscwater.com	301-206-8602	
FOG Investigator Mark Scholz	Mark.Scholz@wsscwater.com	301-206-8545	
Prince George's County			
FOG Investigations Supervisor Mike Harper	MichaelD.Harper@wsscwater.com	301-206-8580	
FOG Investigator Sameer Ali	Sameer.Ali@wsscwater.com	301-206-8477	
FOG Investigator Ricky Rodriguez	Ricky.Rodriguez@wsscwater.com	301-206-8535	
FOG Investigator Kevin Smith	Kevin.Smith@wsscwater.com	301-206-8457	
FOG Investigator Dale Youngquist	Dale.Youngquist@wsscwater.com	301-206-8546	
Section Manager			
Section Manager Scott Horn	John.Horn@wsscwater.com	301-206-8719	

WSSC FOG Program "by the numbers"





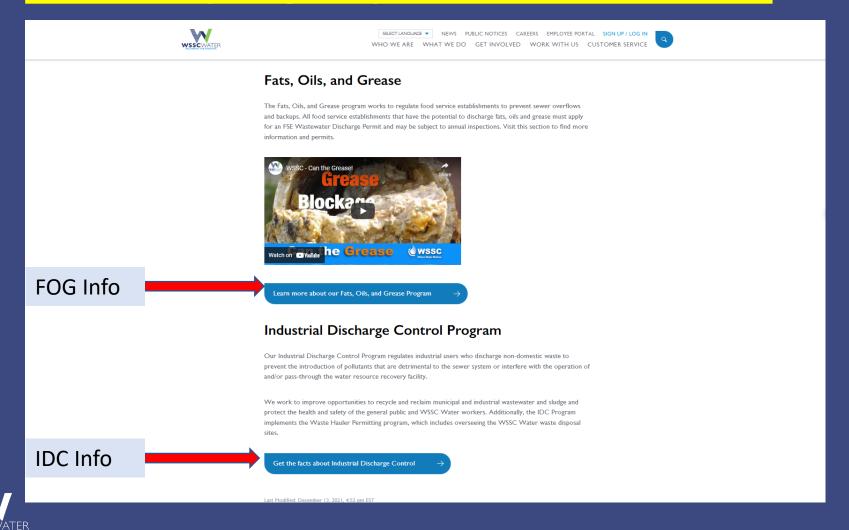




- 6500+ FSEs registered with region health departments;
- 4890 active FOG regulated FSEs in a 900 square mile area;
- 4500 total inspections per year;
- 610 FSEs per Investigator with staff of
- 8 FOG Investigators
- >1500 outdoor "interceptors"
- >2500 indoor "GADs"
- 33 licensed "grease" haulers
- 1 grease dumping site within the WSSC service district (WSSD)



Find us on the web: Homepage | WSSC Water



Related Links

- Licensed Haulers
- FSE Permit Numbers by Name & Address
- Responding to a Grease Violation for FSE Owners

Read More on Fats, Oils & Grease

Fats, Oils, & Grease Instructional Videos

These instructional videos show Food Service Establishments the proper procedures for cleaning grease interceptors.

Fats, Oils, & Grease Training

WSSC Water offers free FOG training to Food Service Establishments and Grease Waste Haulers

Fats, Oils, & Grease Contacts

Food Service Establishments that have questions about the FOG Program can contact the Fats, Oils and Grease section.

Partnering to Protect Clean Water

Our FOG program is key to preventing sanitary sewer overflows, sewage backups and sewage spills.

Fats, Oils, & Grease Program FAQs

Violations of the Code

If someone else doesn't follow the rules when your plumbing needs work, you could get in trouble. Don't take chances, learn how to be Code-smart.



General References

FOG: Fats, Oils and Greases

IDC: Industrial Discharge Control

SSO: Sanitary Sewer Overflow

 Any unpermitted spill, release, or discharge from the Collection System (overflowing manholes, pumping stations, stream crossings,, etc.)

BBK: Building Backup

 The release from the Collection System through a lateral to a building or structure (usually basement backups)

FSE: Food Service Establishment

 A business, usually defined by Code, that prepares food that may contain FOG

GAD/GRD: Grease Abatement/Recovery Device

- A device designed to physically remove FOG within given specifications
- Flow-Based: typically, indoor, smaller units, up to 300 gallons
- Volume Based: typically, outdoor, larger units





A FOG program's primary objective is SSO PREVENTION

- SSO's in a service area have the potential to discharge thousands of gallons of raw or partially treated sewage into the storm drain system and ultimately to the local water bodies;
- In addition, Building Back Ups can cause additional damages to property and the environment.
- It has been estimated that 40-60% of all SSOs and basement backups nationwide are grease related.
- Although WSSC is at 25-28%, we remain under a Federal Consent Decree until at least 2024 that has specific FOG Program requirements and conditions, hence a "more complicated" FOG disposal tracking program. (i.e. we are not like any other MD county or small city utility)







That "greasy" build-up











Questions?





Scott Horn FOG Section Manager, WSSC john.horn@wsscwater.com

Types of Grease Abatement

Corey Norris – FOG Investigator Montgomery County

SOME SOURCES OF FOG









There are two types of Grease Interceptors

- 1. Volume-Based Grease Interceptor:
 - (VBGI) 300 10,000 Gallon
- 2. Flow-Based Grease Interceptor:
 - Passive (PFBGI)
 - Mechanical (MFBGI)
 - 25-100 GPM flow rate
 - 25 to 299 gallons in volume



VOLUME BASED INTERCEPTORS 300-10,000 gallon



Grease interceptors installed in the ground must have the manhole access ways installed to finish grade.









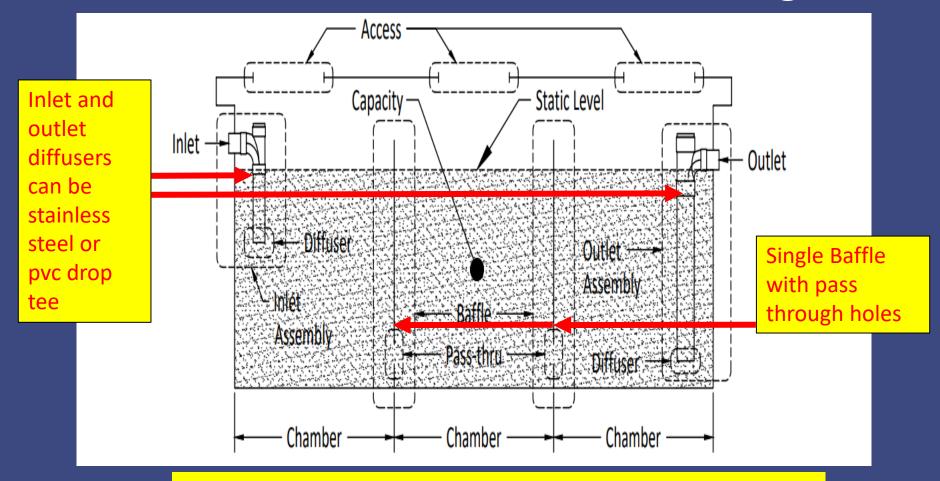
Interior volume-based grease interceptor

Existing concrete interceptors that are being replaced will be in line with newly manufactured steel and fiberglass interceptors.





New approved precast VBGI design; similar to other manufactures design





The Full Design Manual is found on WSSC Water website;
Plumbing, Mechanical & Engineering Plan Review | WSSC Water

Volume Based Interceptor installed above ground. There is no platform or permanent ladder for ready access for cleaning and inspection.

The new revisions to the WSSC Plumbing and Fuel Gas Code now requires a permanent platform unless an approved waiver was issued to allow an OSHA approved mobile step ladder with OSHA approved platform at the top. Like the type at Home Depot and Lowes.







Electronic Monitoring and Alarm Systems

The monitoring device must be installed in Chamber 1 of the interceptor not chamber 2 or 3.

WSSC does not allow for the collected data alone to dictate the pumping frequency. However, this data along with the readings reported on the grease manifest will be evaluated to determine if an FSE can pump on a less frequent basis or more frequent basis.







Passive Flow Based Grease Interceptors



Passive Flow Based (usually installed indoor)











Below-grade passive flow-based interceptors











Types of Grease Abatement Devices

Mechanical Flow Based Grease Interceptors











Questions?





Scott Horn FOG Section Manager, WSSC john.horn@wsscwater.com

Grease Cleaning Procedures

Mark Scholz – FOG Investigator Montgomery County



Maintenance Directives-must be posted and/or readily available

The Maintenance Directive

This document is available from the FSE.
It assigns the <u>required</u>
<u>frequency</u> of cleaning for the grease abatement device.

You may ask you customer for a copy to help determine their needs.





Washington Suburban Sanitary Commission



FATS, OILS AND GREASE UNIT 14501 Sweitzer Lane, Laurel, MD 20707

M-844141

MAINTENANCE DIRECTIVE GREASE ABATEMENT SYSTEM (KEEP POSTED)

Property
Owner/Tenant:

Ashokkumar Sagadevan
DATE: 04/28/2022

Company/Facility: BIRYANI CITY

Address: 4830 BOILING BROOK PKWY ROCKVILLE, MD 20852

In accordance with the Plumbing and Fuel Gas Code Regulations of the Washington Suburban Sanitary Commission (WSSC), a grease abatement system has been installed at your facility. This system was installed to prevent grease and/or other substances from entering the waste collection system and causing damage or blockages.

In accordance with the WSSC Plumbing and Fuel Gas Code Regulations, you are hereby directed to:

Any grease abatement device maintenance logs shall be available for review by a WSSC FOG Investigator on demand. A minimum of 3 (three) calendar years of record shall be available on the premises. Copies of your contracted hauler manifests (if applicable) are also required to be onsite.

Implement Best Management Practices as outlined in the WSSC Wastewater Discharge Permit (if issued) and Section 818 of the WSSC Plumbing and Fuel Gas Code.

Maintain grease abatement device on a quarterly basis.

All maintenance frequencies prescribed in this Directive are minimum intervals of maintenance. It is the responsibility of the recipient to conduct periodic inspections of the trap or interceptor and conduct cleaning more frequently if necessary. Please be advised that the property owner and operator of the food-handling establishment may be held jointly liable for any damages resulting from discharges from the food-handling establishment. Changes to your GAD system require WSSC pre-approval.

Failure to comply with this Directive will result in Civil Citations (fines) of \$250.00 and up to \$1,000.00 and/or TERMINATION OF WATER SERVICE.

Mark Scholz	1532	Rakesh Singh Waiter	
WSSC Representative (Printed) ID#	Authorized Representative/Title (Printed)	
x Mes 18		x Radach	
Signature		Signature	
2405335797mark.scholz@w	sscwater.com	301 744 9444	
Telephone / er	nail	Telephone	

Refer to your "Waste Hauler General Conditions" for detailed instructions

- 1. Inspect Interceptor for any issues prior to cleaning
- 2. Take a picture of site with interceptor manhole covers still installed
- 3. Clean Interceptor (COMPLETELY REMOVE ALL FATS, OILS, GREASE, WATER AND SOLIDS FROM THE INTERCEPTOR INTERIOR)
- 4. TAKE PICTURES OF THE CLEAN INTERCEPTOR
- 5. Re-install interceptor manhole covers
- 6. Take pictures of site with manhole covers reinstalled
- 7. Report any defective components of the interceptor that are missing or not functioning properly to the WSSC FOG Office.
- 8. If the interceptor is causing an environmental or sanitary impact report it immediately as outlined in the Current Waste Hauler General Conditions



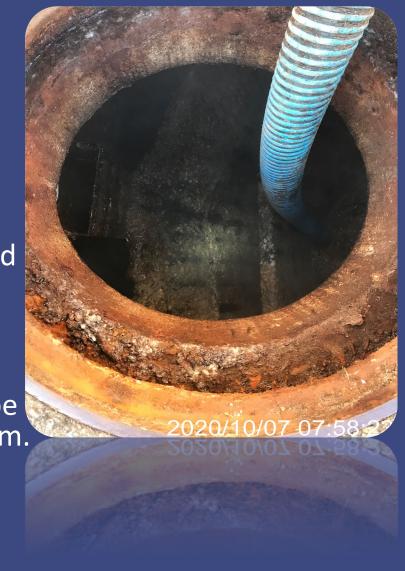
Passive Flow-Based GAD Cleaning (typical)

- Clean out the grease trap ENTIRELY.
- Remove the baffles.
- Scrape the baffles and inside walls of the tank to remove FOG buildup.
- Dry wipe the trap rather than using water and cleaning chemicals.
- Reassemble per manufactures specifications.



WSSC general Interceptor maintenance guidelines

- There should be an adequate number of manholes to provide access for properly cleaning the interceptor
- All grease interceptors should be cleaned at regular intervals. This varies with regulatory requirements.
- Typically, bi-weekly to quarterly.
- When cleaning, the entire tank should be cleaned, including solids from the bottom. "Definition of clean" for (WSSC is "emptied")





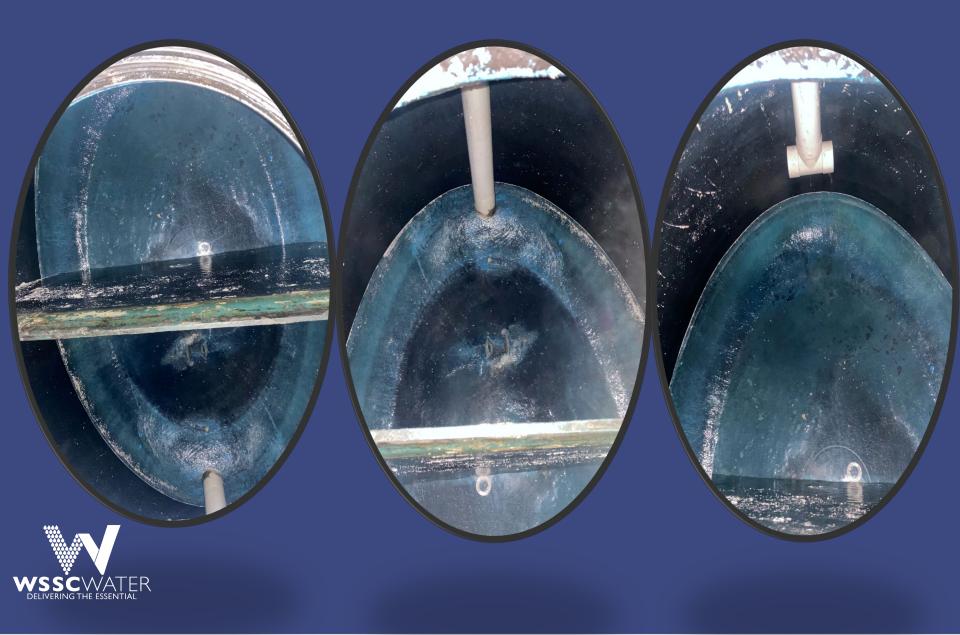
BEFORE







After (Completely Empty)



- *Digital, date stamped photographs are required to be taken as evidence of the work completed.
- *Maintain the photographic records for three (3) years at your place of business.
- *All photos must be date and time stamped with the location accurately documented.
- *Photographs are to include, at a minimum:
- 1) The site, location of interceptor with manhole covers still installed. (prior to cleaning)
- 2) All compartments of the grease interceptor emptied
- 3) The site with the interceptor lids reinstalled.



EXAMPLE PHOTOGRAPHS

The Site



PICTURE OF THE SITE:





Pictures of all chambers empty

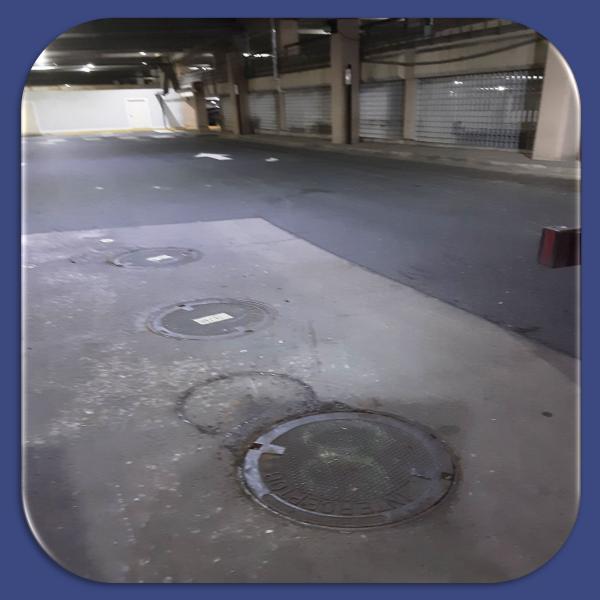








PICTURE OF THE SITE AFTER CLEANING WITH MANHOLE COVERS RE-INSTALLED:





Interceptor Inspection



- Visually inspect the interceptor/trap
- The influent (or entry) side usually has the heavier amounts of grease (top photo here). A stainless-steel baffle or a pipe Tee should be showing.
- You should be able to see an outlet arrangement to gauge efficiency on the other end (bottom photo).



Common Grease Abatement Device Violations

- Baffle wall leaking/collapsed (picture below)
- Trap deteriorated/leaking

Inlet and outlet diffuser baffles deteriorated or broken







Outlet diffuser baffle rusted through and allowing FOG to enter the sewer system. This situation must be reported to the FOG Section within 24 hours via email to FOG unit@wsscwater.com







Missing Inlet Baffle



Missing Outlet Baffle



Wall and baffle rusted through



If you find the Interceptor overloaded and/or about to surcharge/overflow.

This situation must be reported to the FOG Section within 24 hours via email to the FOG_unit@wsscwater.com



Reporting of damage or deteriorating conditions of a grease interceptor. Make sure to report it in the time frame laid out in the Waste Hauler General Conditions Section 12, items 7 & 8.

- 7) If the interceptor or trap is not functioning properly due to defective or missing pipes or components, or if the interceptor or trap is leaking, the permittee shall report these findings on the manifest form and report via email notification within 5 business days for faulty interceptors or traps to WSSC Water's Fats, Oils, and Grease Section at FOG_Unit@wsscwater.com.
- 8) If the trap or interceptor is causing an environmental or sanitary impact, i.e. overflowing or about to overflow, the waste hauler shall perform the following notification steps;
- (a) Notification to the property owner or tenant that is responsible for the interceptor noting they need to call a plumber to inspect and service the piping to and from the interceptor
- (b) Document the issue on the grease manifest and include whom the information was discussed with at the FSE directing them to contact a licensed plumber to clear any stoppages causing the interceptor to overflow. See note 2 below.
- (c) Copy of manifest must be emailed to FOG_Unit@wsscwater.com identifying the issue within 24 hours, next business day



FSE Discharge Permit Requirements

FSE Wastewater Discharge Permit Requirements

EPA Minimum Permit Requirements:

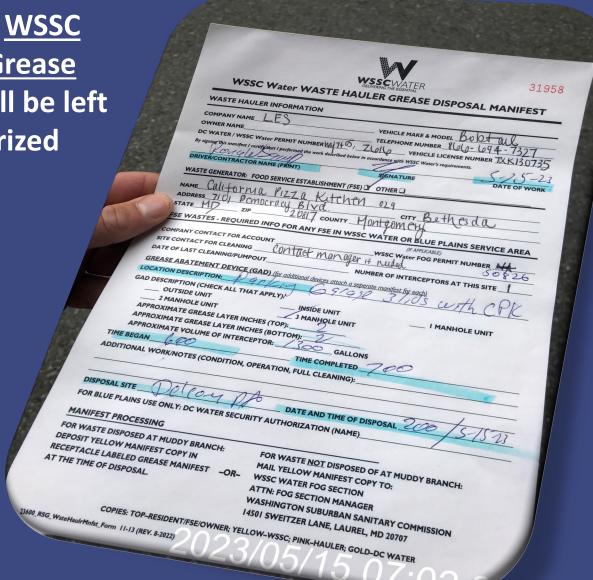
- (1) Best Management Practices (BMPs) for controlling FOG discharges
- (2) Grease abatement system operations and maintenance standards, when applicable.
- (3) On-site record keeping requirements.



- (4) Statement of non-transferability. (Name/Ownership changes)
- (5) Other conditions as deemed appropriate by the WSSC.



The white copy of the WSSC
Water Waste Hauler Grease
Disposal Manifest shall be left
on site with an Authorized
Representative





Questions?



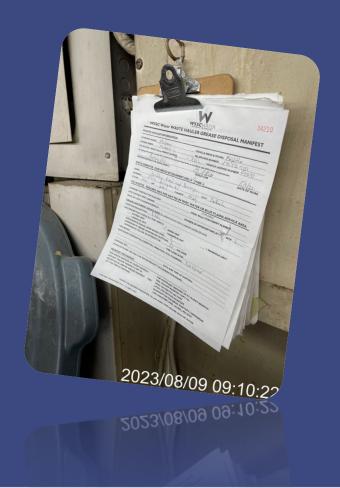


Scott Horn FOG Section Manager, WSSC john.horn@wsscwater.com

Waste Hauler Grease Manifests

Scott Horn – FOG Section Manager





WSSC MANIFESTING

- 1. Currently paper based with data input to a database where info is stored and reviewed.
- 2. 100% digital is being developed and is scheduled to be ready for use to the industry in February 2024.
- 3. Manifests must be deposited when discharging at Muddy Branch
- 4. Must mail the manifest to WSSC Water when discharging at Non-WSSC waste disposal site for volumes greater than 100 gallons within 4 weeks of the cleaning date.

Manifesting ("smart" utility choice) advantages

- Various systems used by utilities nationwide
- WSSC's satisfy Consent Decree tracking requirements (per EPA)
- Identifies responsible parties
- Helps quantify the waste
- Helps quantify the interceptor usage, characteristics
- Helps track compliance
- Can help determine interceptor condition
- Documents maintenance
- Tracks the waste
- Protects the hauler



MANIFEST EXCEPTION NOTE

- Manifests are required for the cleaning of all GADs located in FSEs within the WSSC service area regardless of the disposal site, however.....
- WSSC FOG manifests documenting the cleaning of flow-based grease interceptors (the "indoor grease traps") up to 100 gallon capacity, will be OPTIONAL for Zero Discharge Haulers
- <u>Full Permit Waste Haulers</u> are required to submit manifests for <u>any volume</u> of waste when disposed at Muddy Branch (mailing duplicate optional).
- WSSC will continue to work with Waste Haulers, property owners/managers and FSEs for volume-based interceptors that are shared by more than one FSE.
 - Some locations already have been set and are working for the recordkeeping process.



FOG Discharge Permit



Fats, Oils, and Grease Program Food Service Establishment Discharge Permit

(This permit must be posted conspicuously at the place of business)

Permit Number

Permitted Facility: WHEATON HIGH SCHOOL CONCESSION

Permit Number: 67088

Site Address: 12401 DALEWOOD DR MCPS SILVER SPRING, MD 20906

In accordance with the provisions of the Washington Suburban Sanitary Commission's (WSSC's) Plumbing and Fuel Gas Code and applicable provisions of Federal and State law, the above named Food Service Establishment, hereinafter referred to as "FSE," is hereby granted permission to discharge wastewater into the WSSC's sewer system in accordance with the General and Special conditions contained herein.

In the event that this Discharge Permit is revoked, terminated, suspended, or otherwise made invalid in accordance with the WSSC's FSE Enforcement Response Plan, all discharges into the WSSC's sewer system shall immediately cease.

This Discharge Permit shall remain in effect unless modified, suspended, or terminated in accordance with Section I.B.6.



Effective Date: 3/1/2021

Blank Manifest





(WSSC Water) WASTE HAULER GREASE DISPOSAL MANIFEST:

AMPANYANIA					
OWNER NAME			VEHICLE MAKE & MODEL		
			TELEPHONE NUMBER		
		MBER/			
By signing this manifest I certify that I performed the work described below in accordance with WSSC Water's requirements.					
	ACTOR NAME (PRINT		SIGNATURE	DATE OF WORK	
WASTE GENERAL	TOR: (FOOD SERVIC	ESTABLISHMENT (FSE)) (OTHER		
ADDRESS			CITY		
STATE	ZIP	COUNTY			
		FOR ANY FSE IN WS			
			(IF AF	PLICABLE)	
COMPANY CONTACT FOR ACCOUNT WSSC Water FOG PERMIT NUMBER SITE CONTACT FOR CLEANING DATE OF LAST CLEANING/PUMPOUT NUMBER OF INTERCEPTORS AT THIS SITE GREASE ABATEMENT DEVICE (GAD) (for additional devices attach a seperate manifest for each) LOCATION DESCRIPTION:					
		RCEPTORS AT THIS SITE			
		rest for each)			
	ON (CHECK ALL THAT				
			UNIT	1 MANHOLE UNIT	
OUTSIDE UNIT 2 MANHOLE UNIT		3 MANH	3 MANHOLE UNIT		
APPROXIMA	ATE GREASE LAYER	NCHES (TOP):			
APPROXIMA	ATE GREASE LAYER	INCHES (BOTTOM):			
APPROXIMA	ATE VOLUME OF INTE	RCEPTOR:	GALLONS		
ADDITIONAL WO	RK/NOTES (CONDITI	ON, OPERATION, FULL CL	EANING):		
				DSAL	
FOR BLUE PLAIN	IS USE ONLY: DC WA	TER SECURITY AUTHORIZ	ATION (NAME)		
MANIFEST PRO	CESSING				
DEPOSIT YELLOW	V MANIFEST COPY	MAIL YELLOW MANIFES	T COPY TO:	_	
IN RECEPTACLE I		ATTN: MR. WAYNE LUDY			
GREASE MANIFE: MUDDY BRANCH	STATTHE -OR-				
DISPOSAL SITE A		REGULATORY SERVICES WASHINGTON SUBJECT	S GROUP AN SANITARY COMMISSIO	DAI.	
OF DISPOSAL.		14501 SWEITZER LANE		, in	

COPIES: TOP-RESIDENT/FSE/OWNER; YELLOW-WSSC; PINK-HAULER; GOLD-DC WATER

23800_RSG_WateHaulrMnfst_Form 11-13 (REV. 1-2020)

Waste Hauler information section



(WSSC Water) WASTE HAULER GREASE DISPOSAL MANIFEST:

WASTE HAULER INFORMATION		
COMPANY NAME	VEHICLE MAKE & MODEL	
OWNER NAME		
DC WATER / WSSC Water PERMIT NUMBER		
By signing this manifest I certify that I performed the work desc		
DRIVER/CONTRACTOR NAME (PRINT)	SIGNATURE	DATE OF WORK



Name and address of FSE as shown on FOG Discharge permit or Maintenance Directive issued to FSE

WASTE GENERA	TOR: (FOOD SERVICE E	STABLISHMENT (FSE) (OT	HER	
NAME				
ADDRESS			CITY	
STATE	ZIP	COUNTY		



WSSC Water FOG Permit Number

- 1. For all facilities in the WSSC Water Jurisdiction a FSE FOG Permit number is required to be entered.
- 2. A list of all active FSEs can be obtained on the WSSC Water Internet page.
- 3. The Facility will have a FOG Discharge Permit Posted on-site if they have been permitted by WSSC Water.

FSE WASTES - REQUIRED INFO FOR ANY FSE IN WSSC WATER OR BLUE PLAINS SERVICE AREA

	(IF APPLICABLE)	
COMPANY CONTACT FOR ACCOUNT	WSSC Water FOG PERMIT NUMBER	
SITE CONTACT FOR CLEANING		
DATE OF LAST CLEANING/PUMPOUT	NUMBER OF INTERCEPTORS AT THIS SITE	



GREASE ABATEMENT DEVICE (GAD) (for a	additiona	al devices attach a seperate manifest for each)		
LOCATION DESCRIPTION:				
GAD DESCRIPTION (CHECK ALL THAT APPLY)	:			
OUTSIDE UNIT		- INSIDE UNIT - 1 MANHOLE U	1 MANHOLE UNIT	
		-3 MANHOLE UNIT		
APPROXIMATE GREASE LAYER INCHES (TOP): _			
APPROXIMATE GREASE LAYER INCHES (BOTTON	n):		
APPROXIMATE VOLUME OF INTERCEPTO)R:	GALLONS		
TIME BEGAN		TIME COMPLETED		
ADDITIONAL WORK/NOTES (CONDITION OPEN	NOITAS	FULL CLEANING):		
		DATE AND TIME OF DISPOSAL		
FOR BLUE PLAINS USE ONLY: DC WATER SEC	URITY A	UTHORIZATION (NAME)	43	
MANIFEST PROCESSING				
FOR WASTE DISPOSED OF AT MUDDY		FOR WASTE NOT DISPOSED OF AT MUDDY BRANCH:		
BRANCH: DEPOSIT YELLOW MANIFEST COPY		MAIL YELLOW MANIFEST COPY TO:		
IN RECEPTACLE LABELED	*OR*	WSSC WATER FOG SECTION ATTN: FOG SECTION MANAGER		
GREASE MANIFEST AT THE TIME OF DISPOSAL.		WASHINGTON SUBURBAN SANITARY COMMISSION		
TIME OF DISPOSAL		14501 SWEITZER LANE, LAUREL, MD 20707		

COPIES: TOP-RESIDENT/FSE/OWNER; YELLOW-WSSC; PINK-HAULER; GOLD-DC WATER





(WSSC) WASTE HAULER GREASE DISPOSAL MANIFEST:

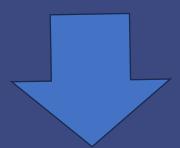
WASTE HAULER INFORMATION
COMPANY NAME COCKET ROOTH VEHICLE MAKE & MODEL INTERESTIONS
OWNER NAME D SOLOW TELEPHONE NUMBER SOL- 424 114
DC WATER / WESC PERMIT NUMBER 620 / VEHICLE LICENSE NUMBER 67 F25
By signing this manifest (certify that I performed the work described below in accordance with WSSC's requirements.
DRIVER/CONTRACTOR NAME (PRINT) SIGNATURE DATE OF WORK
WASTE GENERATOR: (FOOD SERVICE ESTABLISHMENT (FSE) LI) (OTHER - C/C/L/A
NAME (COMODO) C/C/LAB ADDRESS 3601 CLUB COUNTY MC STATE MD ZIP 20814 COUNTY MC
FSE WASTES - REQUIRED INFO FOR ANY FSE IN WSSC OR BLUE PLAINS SERVICE AREA
COMPANY CONTACT FOR ACCOUNT STEPLEN WSSC FOR PERMIT NUMBER 50357 SITE CONTACT FOR CLEANING
DATE OF LAST CLEANING/PUMPOUT MINTE / NUMBER OF INTERCEPTORS AT THIS SITE /
GREASE ABATEMENT DEVICE (GAD) (for additional devices attach a secerate manifest for each)
LOCATION DESCRIPTION: 10 45 102
GAD DESCRIPTION (CHECK ALL THAT APPLY):
COUTSIDE UNIT INSIDE UNIT MANHOLE UNIT
2 MANHOLE UNIT 3 MANHOLE UNIT
APPROXIMATE GREASE LAYER INCHES (TOP): APPROXIMATE GREASE LAYER INCHES (BOTTOM):
APPROXIMATE VOLUME OF INTERCEPTOR: 1600 GALLONS
TIME BEGAN 5 15 TIME COMPLETED 5 39
ADDITIONAL WORK/NOTES (CONDITION, OPERATION, FULL CLEANING):
FOR BLUE PLAINS USE ONLY: DC. WATER SECURITY AUTHORIZATION (NAME)
MANIFEST PROCESSING
DEPOSIT YELLOW MANIFEST COPY N RECEPTACLE LABELED SPECIAL THE OR ON TO CORDINATOR MAIL YELLOW MANIFEST COPY TO: ATTN: MR. WAYNE LIDWIG FOG UNIT COORDINATOR REGULATORY SERVICES GROUP DISPOSAL SITE AT TIME WASHINGTON SUBURBAN SANITARY COMMISSION 14501 SWEITZER LANE LAUREL NO 2020Z
OF DISPOSAL. 14501 SWEITZER LANE, LAUREL, MD 20707



COPIES: TOP RESIDENT/FSE/OWNER; YELLOW-W3SC; PINK-HALLER; GOLD-DG WATER

If you cannot locate a WSSC Water FOG Permit Number at the FSE or from the website below.

Please contact the FOG Section at 301-206-8811 or email fog_unit@wsscwater.com and we will provide the FOG number.



https://www.wsscwater.com/fog







Related Links



- Licensed Haulers
- FSE Permit Numbers by Name & Address
- Responding to a Grease Violation for FSE Owners

Read More on Fats, Oils & Grease

Fats, Oils, & Grease Instructional Videos

These instructional videos show Food Service Establishments the proper procedures for cleaning grease interceptors.

Fats, Oils, & Grease Training

WSSC Water offers free FOG training to Food Service Establishments and Grease Waste Haulers

Fats, Oils, & Grease Contacts

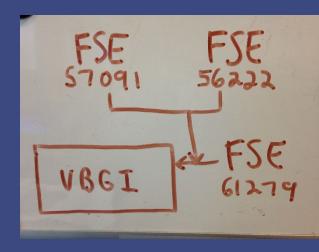
Food Service Establishments that have questions about the FOG Program can contact the Fats, Oils and Grease section.



A word about shared interceptors (multiple FSEs discharging to the same interceptor)

- WSSC (LINKO) database is not technically set-up to credit 3 FSEs with one interceptor;
- Requires Property
 owner/manager involvement
 and education;
- Coordination between WSSC/Onsite owner/FSE and Hauler

[1003.2.4 Property owners of commercial properties, or their official designee(s), shall be responsible for the installation and maintenance of grease abatement systems serving multiple Food Service Establishments that are located on a single parcel.]







Please ensure to submit your completed manifests within the timeframe required on your Waste Hauler Permit General Conditions; Late or incomplete manifest, Is a violation of your waste hauler permit

- Discharge at Muddy Branch Must drop off in mailbox at the site at time of disposal
- Discharge at a site not in WSSC Water Jurisdiction Mailed into WSSC within 4 weeks



Questions?





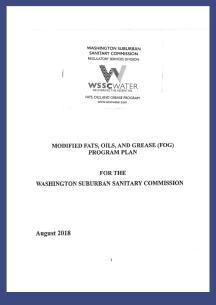
Scott Horn FOG Section Manager, WSSC john.horn@wsscwater.com

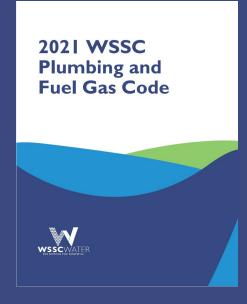
Code Sections

Sameer Ali – FOG Investigator Prince George's County



WSSCWATER (WSSC Water) WASTE HAULER GREASE DISPOSAL MANIFEST:							
					COMPANY NAME	VEHICLE MAKE & MODEL	
						TELEPHONE NUMBER	
DC WATER / WSSC Water PERMIT NO		E NIIMOED					
	formed the work described below in accordance with WSSC Water						
DRIVER/CONTRACTOR NAME (PRIN	D SIGNATURE	DATE OF WORK					
	E PETARI MUNICIPAT PROPINCIA ANTHONICA						
MADEL GENERAL OR: (FOOD SERVIC	E ESTABLISHMENT (FSE) () (OTHER (
NAME							
ADDRESS	CITY						
STATE ZIP	COUNTY						
FSE WASTES - REQUIRED INF	O FOR ANY FSE IN WSSC OR BLUE PLAINS SEI	RVICE AREA					
COMBANY CONTACT FOR A COOLING	(FAPPLICA WSSC Water FOG P	9LE)					
BITE CONTACT FOR CLEANING	WSSC Water FOU P	EHMIT NUMBER					
	NUMBER OF INTERCEPT	1000 AV WHO DOWN					
LOCATION DESCRIPTION:	AD) (for additional devices attach a seperate manifest for	v.each)					
SAD DESCRIPTION (CHECK ALL THA	T ADDI VI-						
OUTSIDE UNIT	INSIDE UNIT	1 MANHOLE UNIT					
2 MANHOLE UNIT	3 MANHOLE UNIT						
APPROXIMATE GREASE LAYER APPROXIMATE GREASE LAYER	INCHES (TOP):						
APPROXIMATE VOLUME OF INT	ERCEPTOR: GALLONS						
TIME BEGAN	TIME COMPLETED						
ADDITIONAL WORKNOTES (CONDIT	ON, OPERATION, FULL CLEANING):						
DISPOSAL SITE	DATE AND TIME OF DISPOSAL						
OR BLUE PLAINS USE ONLY: DC W	TER SECURITY AUTHORIZATION (NAME)						
MANIFEST PROCESSING							
N RECEPTACLE LABELED	MAIL YELLOW MANIFEST COPY TO: ATTN: MR. WAYNE LUDWIG						
REASE MANIFEST AT THE -OR- IUDDY BRANCH WASTE	FOG UNIT COORDINATOR REGULATORY SERVICES GROUP						
HSPOSAL SITE AT TIME	WASHINGTON SUBURBAN SANITARY COMMISSION						
OF DISPOSAL.	14501 SWEITZER LANE, LAUREL, MD 20707						
	ISIDENT/FSE/OWNER; YELLOW-W88C; PINK-HAULER; GOLD-D	C WATER					
3500_RSG_WateRaukStrifet_Form 11-13 (RSV.	2020)						







WSSC can regulate/control FOG, IDC, and Plumbing Codes.
THIS OFFERS AN ADVANTAGE OVER MANY TYPES OF FOG PROGRAMS. (WSSC CODE REVISED 2021)

Your basic WSSC Code Section References: 814 and 818

SECTION 814 HAULED WASTES

814.1 Applicability. This subsection shall apply to companies, individuals or partnerships hereinafter referred to as Waste Haulers, engaged in the business of transportation or disposal of domestic wastes or grease from food service establishments. These subsection shall also apply to businesses as deemed appropriate by the Commission including grease interceptor cleaning, buses, carpet cleaning and mobile food service companies.

The cleaning of grease interceptors within the Commission service area without the appropriate permit shall be prohibited. (Food Service Establishments (FSEs) that self-clean flow-based grease interceptors shall not be required to obtain a permit).

814.2 Definitions. In addition to the definitions generally applicable to the provisions of this Code (See Chapter 2), and this Chapter (see Section 801.2), the following definitions are specifically applicable to the provisions of this Section 814, Hauled Wastes.

"Holding tank" means a sealed tank that collects wastewater three removal and transportation to a treatment facility. Commonly trailers and similar uses.

"Non-domestic wastewater" means the liquid wastes from indust from domestic wastes, including the contents of grease abatemer plants or non-domestic sources shall not be discharged at the de writing by the Commission. The contents of grease abatement sy the purposes of this section.

"Point of discharge" means a discharge of waste at any place in the by the Commission shall be prohibited.

"Septic tank" means is an underground chamber made of collection wastewater flows for basic treatment. Settling and anaerobic prowater into a drainfield where the water percolates underground.

"Transfer tank" means a tank, vessel, or container in a centralized various sources or locations before being transferred for disposal

SECTION 818 FOOD SERVICE ESTABLISHMENT DISCHARGE REQUIREMENTS

818.1 Applicability. The regulations in this Section shall apply to establishments where food is served to or provided for the public, with or without charge, including restaurants, cafeterias, hotel kitchens, church kitchens, school kitchens, hospital cafeterias, bars; or any other commercial operation that has the potential to discharge grease-laden wastewater. Food service establishments are referred to hereafter as FSEs. FSEs are a specially designated Industrial User.

818.1.1 Chapter 8 requirements. Notwithstanding the specific requirements in this section, all applicable regulations in Chapter 8 of this Code that relate to industrial users shall also apply to FSEs.

818.2 Permit required. All qualifying FSEs shall obtain or be issued a FSE Wastewater Discharge Permit. New and existing FSEs may be required to complete a fully signed permit survey to document their Discharge Permit. Failure to return a completed permit survey can subject the FSE to enforcement actions. If the Commission deems the FSE qualifies for a Discharge Permit, the FSE survey may also be used as the permit application requiring the FSE's Commission account number and a responsible party signature.

818.2.1 Issuance of discharge permit. To ensure the FSE is aware of requirements of this Code or other federal, state or Commission deadlines, the Commission reserves the right to issue a FSE Discharge Permit before receiving an FSE's completed permit survey.



General FOG Program Enforcement

- The FOG Section has Eight experienced FOG Investigators, Two FOG Investigations Supervisors, and One Section Manager.
- FOG has the investigative and enforcement authority over FSE's, including how they operate and maintain their produced grease and grease abatement devices.
- FOG enforces specific limitations on discharges into the sanitary sewer.
- FOG enforces other portions of the Plumbing and Fuel Gas Code such as plumbing design, fixtures, drainage, interceptors and traps.



Assuring "cross-compliance"

Other Permits.

 Haulers and FSEs must maintain the applicable required County Health Department permit.

 Haulers and FSEs must comply with all permits issued by Local, State or Federal Regulatory agencies.

Permi'to



USE OF "JUGGLER-TYPE" (pump and return) VEHICLES AT INTERCEPTORS





2021 WSSC PLUMBING & FUEL GAS CODE SECTION 807 RIGHT OF ENTRY (page 118) 807.1 Investigation Authority

- 807.1 Investigation Authority
- 807.1.1 Scope of duties. Employees or agents of the Commission shall have the right to enter and inspect any properties, buildings and premises in the Sanitary District or in those portions of Montgomery and Prince George's Counties outside of the Sanitary District, while in the pursuit of their official duties cited in this Code including: Inspecting, monitoring, reviewing records, copying records, setting up monitoring or measuring equipment or any other actions necessary to determine compliance with this Code. Commission personnel shall have the right to document locations, processes, conditions or equipment, at an Industrial User's facility through the use of photographs or video cameras or at the discretion of the Commission, require the Industrial User to supply such documentation
- **807.1.2 Inspections.** Inspections of facilities shall be performed by the Code Official, employees of the Commission, or its agents as deemed necessary by the Commission. Inspections may be performed anytime the facility is in operation, discharging or has a potential to discharge.
- **807.1.3 Identification and Entry.** Where an Industrial User has security measures or safety procedures in force that require proper identification and clearance or special protective equipment before entry can be gained into the premises, the Industrial User shall make necessary arrangements at its own expense, to enable Commission employees, their agents, the State or EPA entry without delay for the purposes of performing their official duties.
- 807.1.6 Intimidation or Obstruction. Industrial Users shall not initiate or permit any action which
 harasses, intimidates, obstructs or threatens Commission employees or their agents in the performance
 of their official duties.



818.4.3 Maintenance and inspection intervals. The minimum maintenance frequency for Volume-Based Grease Interceptors, including cleaning, shall be quarterly, or shall be determined by the manufacturers' recommendations, or by the Code Official's directive, or by Section 818.4.2, "25% Rule", whichever is more stringent. Volume-Based Grease Interceptors shall be internally inspected annually by a qualified inspection service to determine needs for additional cleaning or repair work or other maintenance activities. The minimum maintenance frequency Flow-Based Grease Interceptors, including cleaning, shall be determined by manufacturers' recommendations, or by the Code Official's INDUSTRIAL AND SPECIAL WASTE 2021 WSSC PLUMBING AND FUEL GAS CODE 129 written directive, or by Section 818.4.2, "25% Rule", whichever is more stringent. Flowbased Grease Interceptors shall be inspected weekly so as to identify any operational or maintenance issues and to monitor compliance with the applicable maintenance requirements. Deviation from required maintenance intervals listed above shall be submitted to and approved or disapproved by the Commission in writing before implementation. The Commission shall maintain a list of all such approved deviations, and shall provide said list to MDE and EPA upon written request.

818.4.3.2 Deviation. FSEs who deviate from the frequency of pumping or maintenance requirements of their Commission issued Maintenance Directive, without prior Commission approval, will be in violation and are subject to a civil citation at the discretion of the Code Official.



818.6 Waste hauler. A valid WSSC waste hauler discharge permit or zero discharge permit is required for all waste haulers performing pumping and cleaning services on grease abatement systems located in the Commission service area. Pumping and disposal of the contents shall be performed in accordance with conditions of the waste hauler discharge permit cited in Section 814. "It is a violation of this Code for an FSE to allow an unpermitted waste hauler to perform pumping or cleaning services on the FSE's grease abatement system"

818.7 Use of additives. The introduction into the plumbing system of any surfactant, solvent, emulsifier, free enzymes or material that allows the grease to pass from the grease abatement system into the collection system is prohibited.



GAD Specifics

804.1.1 Temperature. Any liquids or vapors having a temperature greater than 140°F (60C). In no case shall discharged waste raise the temperature at the treatment works influent greater than 104°F (40C).

818.4.2 25% Rule. It shall be the Permittee's/Property Owner's responsibility to ensure that the accumulation of FOG and solids does not exceed 25% of the liquid retention capacity of the grease interceptor. If a grease interceptor is specifically designed to function properly with FOG and solids accumulation greater than 25%, the allowable accumulation of FOG and solids may be adjusted by the Commission on a case-by-case basis

1003.2.8.2.7.4 Access. If a new volume-based grease interceptor must be installed with access higher than 5 feet (1,524 mm) above finished floor or grade, the building owner shall install an OSHA approved permanent platform at the interceptor to provide access for workers.





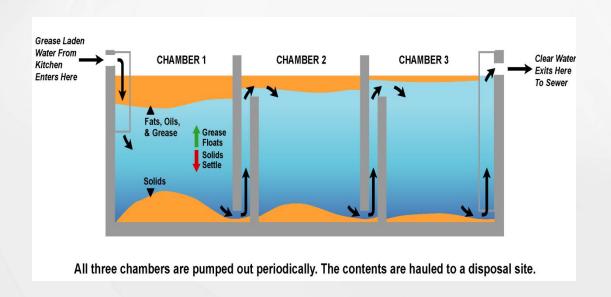


The "25% Rule"



Definition:

The combined depth of the FOG layer and solids layer shall not exceed 25% of the total liquid depth of the grease interceptor. This is why we ask for measurements





FOG Management needs to follow the "cradle to grave" environmental mentality of various E.P.A. Laws





What does CRADLE-GRAVE mean?

The FSE needs to be in compliance from the time they produce grease until the grease is legally disposed of.





BASICALLY-SECTIONS 814 & 818 OF THE WSSC PLUMBING AND FUEL GAS CODE



Think about it a bit....

Reports of obvious
 Violations shall be made to
 FOG_unit@wsscwater.com
 and will remain strictly
 confidential





Questions?





Confined Space

- WSSC is not the regulatory authority for training and enforcing confined space requirements for contractors performing work for their customers.
- MOSH is the regulatory authority for confined space safety requirements
- Contractors and their employees shall be trained and certified in confined space entry and retrieval in accordance with 29 CFR 1910.146
- Contact MOSH for more information and training requirements



What is a Confined Space

Confined space is space that:

- Is large enough & configured that an employee can bodily enter & perform assigned work
- Has limited or restricted means for entry or exit (i.e. tanks, vessels, silos, pits, vaults or hoppers)
- Is not designed for continuous employee occupancy





CONFINED SPACES-SETTING UP WORK











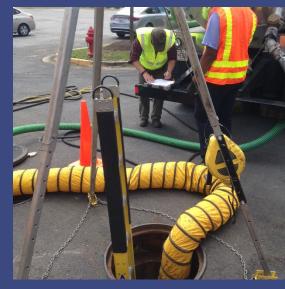
CONFINED SPACE-TYPICAL PRELIMINARY STEPS













CONFINED SPACE ENTRY



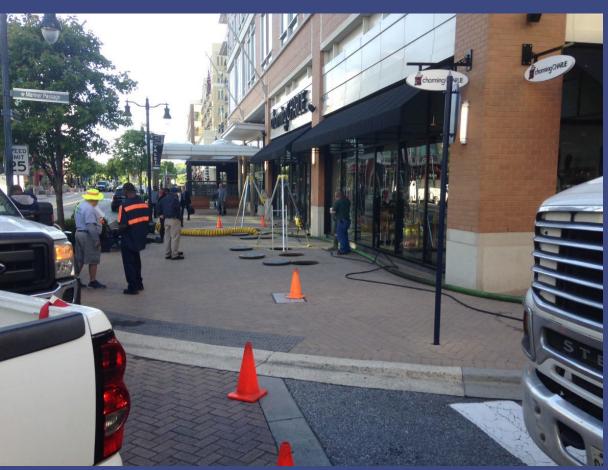








CONFINED SPACE ENTRY "IT'S THE LAW"







Questions?

