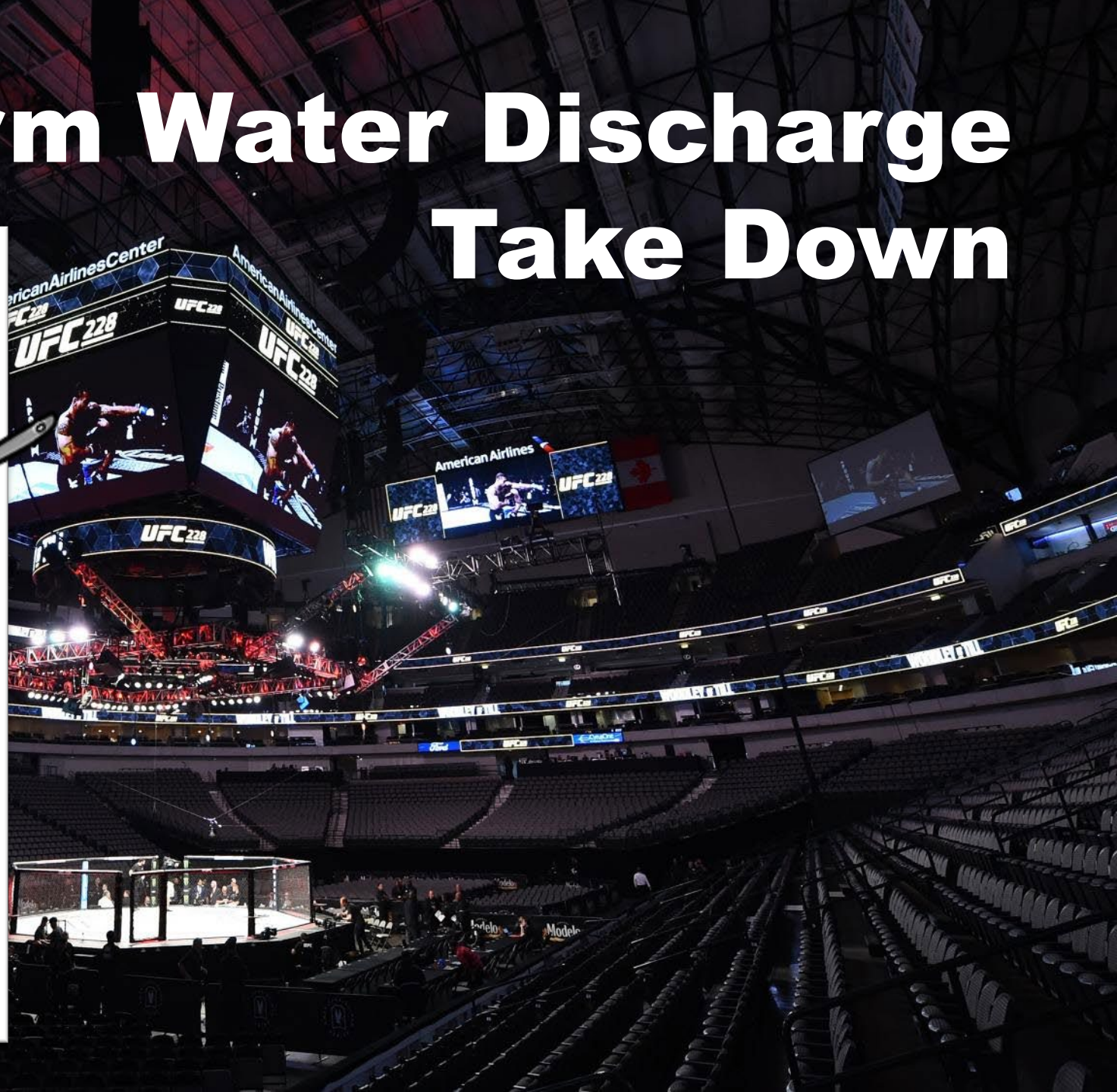
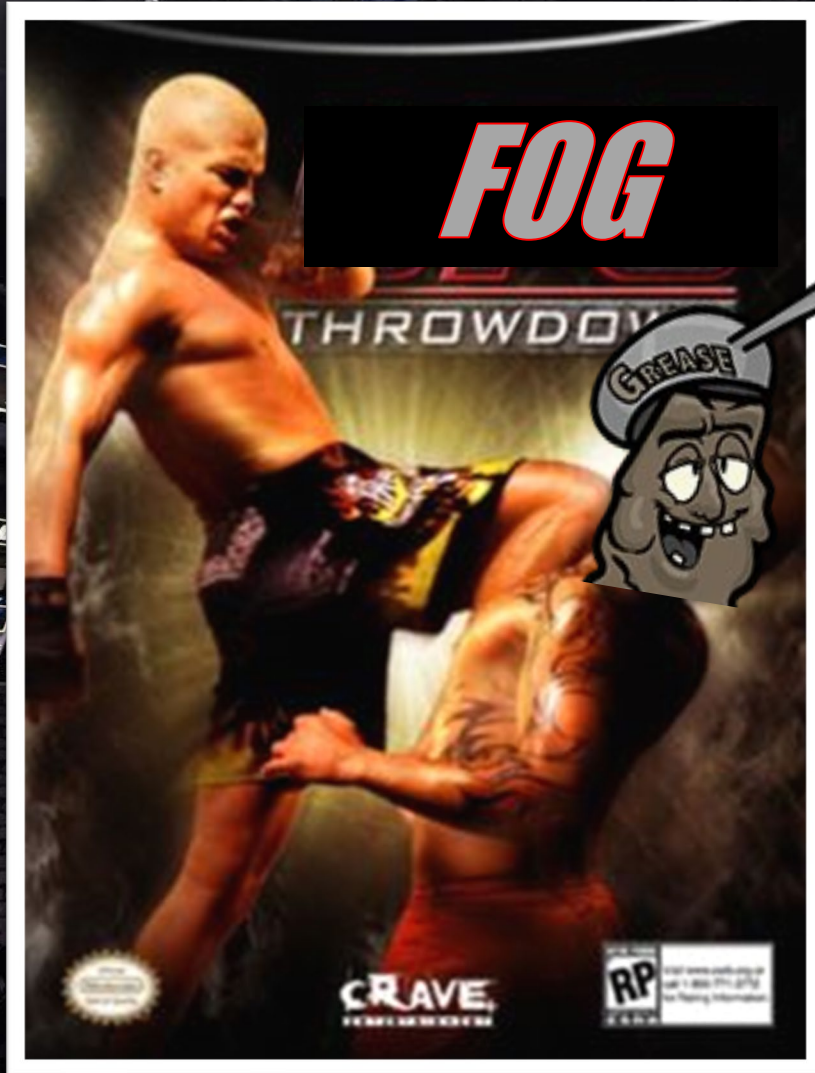


# Storm Water Discharge Take Down



# **IN THIS CORNER FOG**

- **Owners & Landlords**

- **Management**

- **Kitchen Staff**

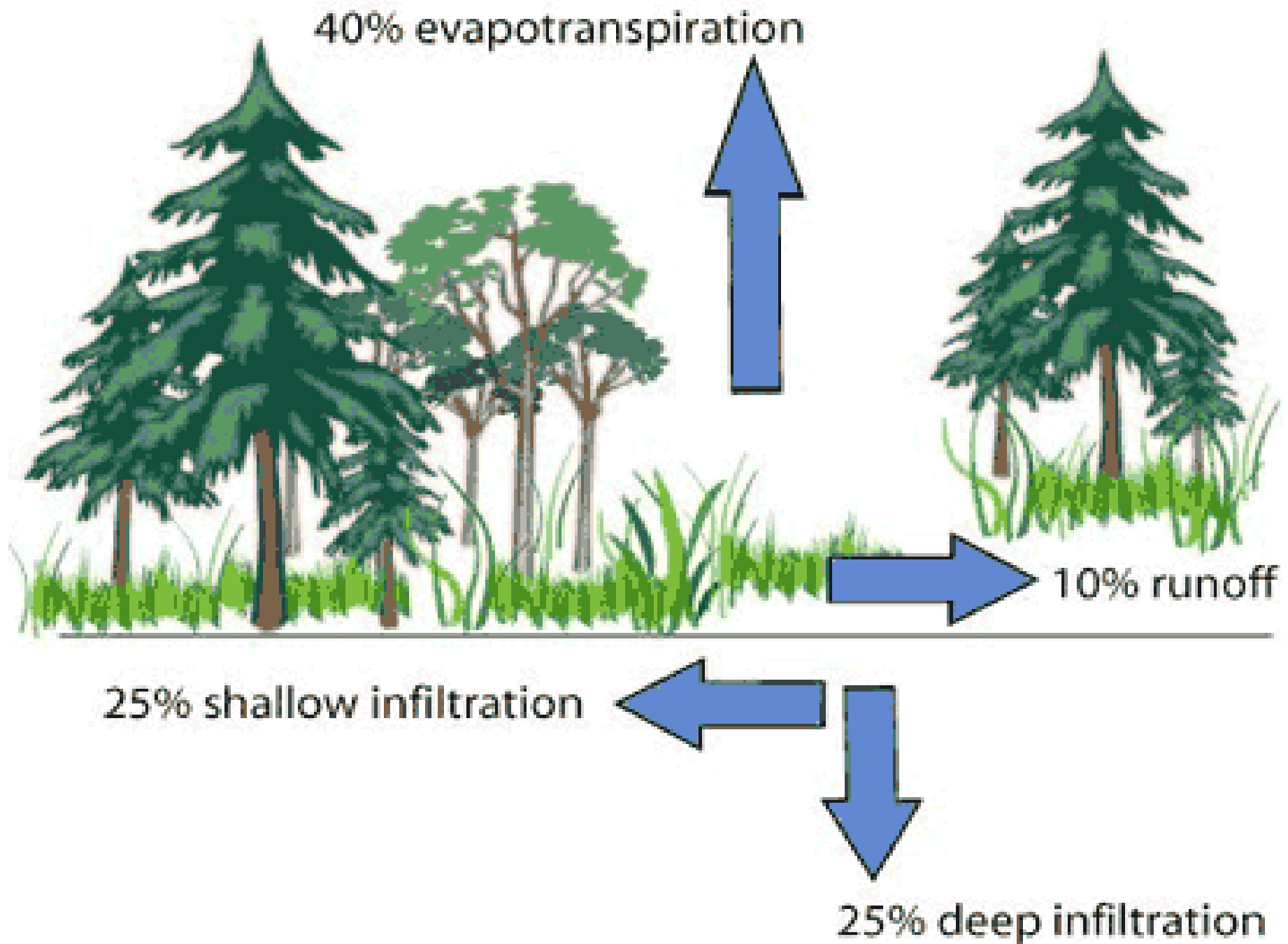
- **Vendors:** Pumpers, Plumbers, Ventilation Specialist

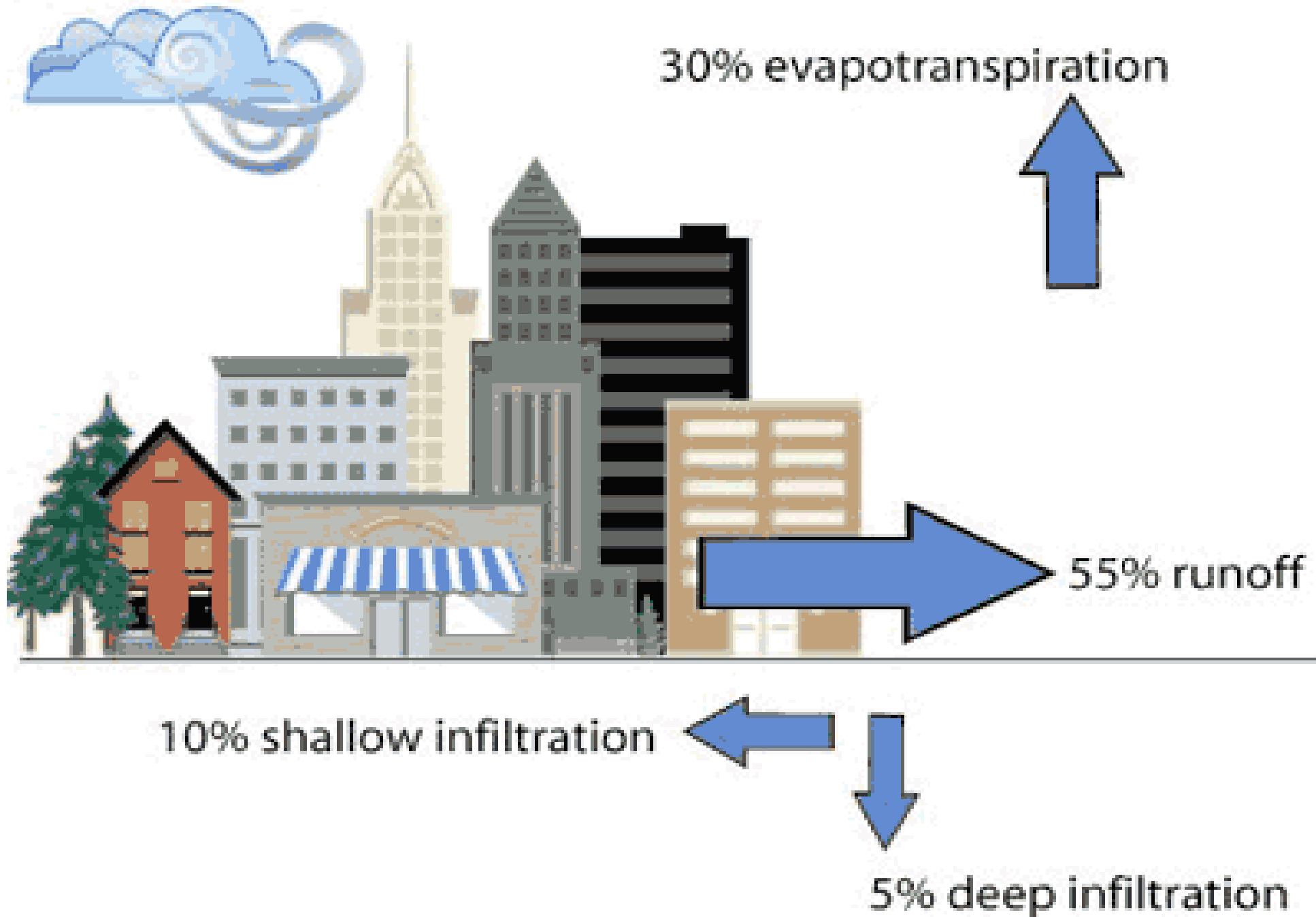
- **Maintenance Practices**

- **Outdoor Storage**

- **Out Door Cleaning**

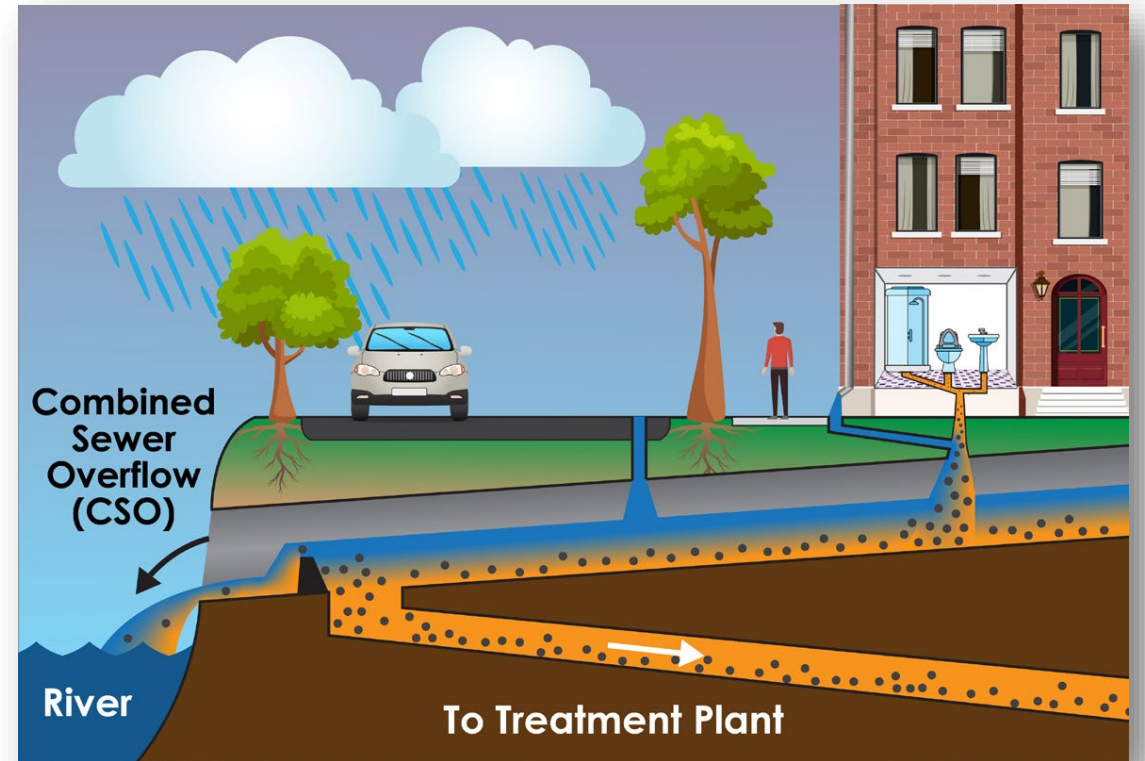
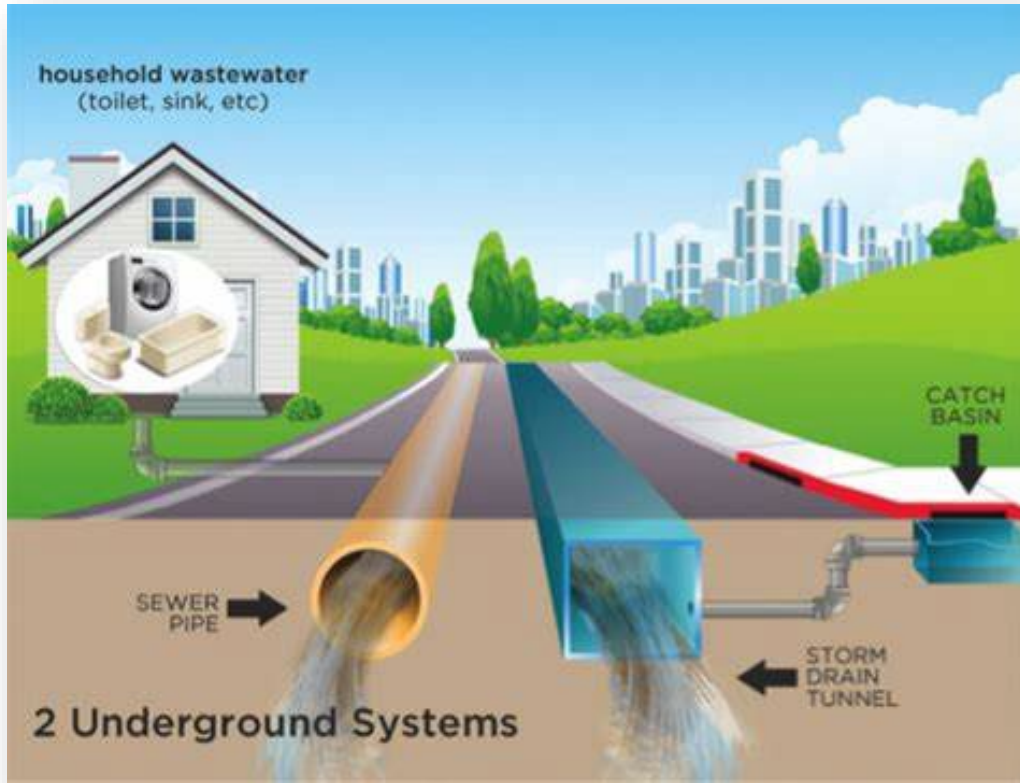
- **Waste Disposal**







# Combined vs. Separate Storm Drain System



# FOG IMPACTS ON STREETS



**How much did this cost the utility and the FSE to cleanup?**





# Storm Water Impacts







# Do These Practices Impact Stormwater?





# Is There A Better Way?



# PROPER WASTE COOKING OIL CONTAINMENT





# Hood, Vent and Ducting Cleaning



# Hood and Vent Hood Cleaning





# Ductwork





# Where Does The Grease Go?





# WHAT'S HAPPENING OUTSIDE THE INTERCEPTOR ?





# FSE Snail Trails



05/11/2009



# IS THIS PART OF KITCHEN BMPS?







Olive Garden Italian



Cool Hand Luke's Steakhouse

Central Valley Youth Football

Learn4Life Clovis - Crescent View West



# IS THIS PART OF KITCHEN BMPS?





# Filter Cleaning





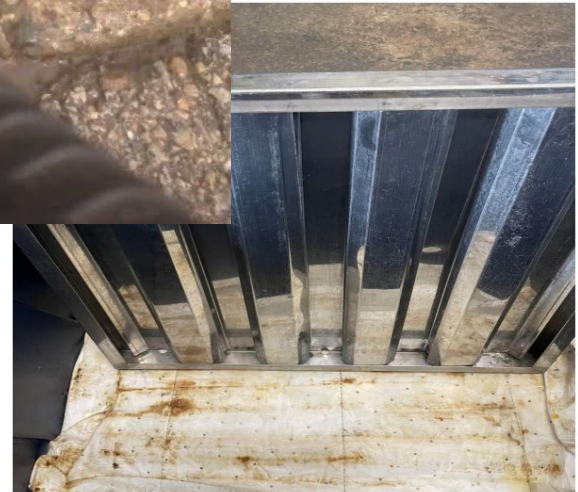
# HOOD FILTER CLEANING INDOORS

## In the 3-Compartment sink

Dirty hood filters may be cleaned in the three-compartment sink and in the dishwasher



# Outdoor Filter Cleaning





# Fans, Vents and Roof Tops





# Where Does This Go?





# What's Going On Here?





# DRIVE THROUGH CLEANING





# CLEANING UP OUTSIDE GREASE SPILLS IS EXPENSIVE!







Justrite

Justrite Water-Filled Spill Berm, 10 ft, PVC, Blue 28452

Now \$101.14 ~~\$\$\$12.48~~

Price when purchased online

## PIG® SpillBlocker® Rough Surface Dike

PLR230 - ★★★★★ (17) [Write a Review](#)



Ideal For One-Time-Use Emergency Spill Response, One 2" W x 10' L x 2.25" H Section

Our Rough-Surface Dike stops spills on asphalt in their tracks with a liquid-tight tacky bottom layer that seeps into surface cracks.



## Nobles 24 Gallon Wet/Dry Vacuum

Item # NO-VWD24-EA

[Send to a Friend](#) [Add to My Shopping List](#)

- 24-gallon capacity
- 100" water lift; 118 CFM
- Wet and dry HEPA filter
- Handles large cleaning tasks & flooded conditions

**\$1,355.29**

QTY:





# APPROACHING ENFORCEMENT



## Broad Authority

- Each application individual
- Time consuming
- Administrative process

## Situational

- Re-inspection fee as needed
- Retrofits
- Cost Recovery for Illicit discharges or Cleaning when source(s) identified
- Non-conforming, illicit actions or discharge
- Repeated Illicit discharge, recalcitrant follow-up



# **Legal Authority**

## ***Ordinances ~ Rules & Regs ~ FOG/NPDES Rules***

**Must be able to:**

- **Condition or prohibit discharges**
- **Control non-domestic discharges through permit**
- **Require reports**
- **Inspect non-domestic facilities and vendors**
- **Take enforcement for non-compliance**





# Enforcement Options

## Use existing municipal code

- Can you use municipal “Nuisance” code?
- Typically enforced by code enforcement officer using a “ticket”

## Use Sewer Use Ordinance

- Enforcement Response Plan should describe
  - Warning Letters
  - Escalating Administrative Penalties
  - Orders (Show Cause, Consent, Compliance)

FF. *Wastewater.* Liquid and water-carried Pollutants from residential dwellings, commercial buildings, industrial and manufacturing facilities, and institutions, whether treated or untreated, which are contributed to the POTW.

### SECTION 2—GENERAL SEWER USE REQUIREMENTS

#### 2.1 — Prohibited Discharge Standards

- A. General Prohibitions. No IU shall introduce or cause to be introduced into the POTW any Pollutant which causes Pass Through or Interference. These general prohibitions and the specific prohibitions in paragraph B. of this subsection apply to all IUs of the POTW whether or not they are subject to Categorical Pretreatment Standards or any other National, State, or local Pretreatment Standards or Requirements.
- B. Specific Prohibitions. No IU shall introduce or cause to be introduced into the POTW the following Pollutants:
1. Pollutants which create a fire or explosive hazard in the POTW, including, but not limited to, waste streams with a closed-cup flashpoint of less than 140 degrees F (60 degrees C) using the test methods specified in 40 CFR 261.21;
  2. Wastewater having a pH less than 5.0 [**Optional Upper pH Limit** – or more than X.X s.u.]<sup>2</sup>, or otherwise causing corrosive structural damage to the POTW or equipment;
  3. Solid or viscous Pollutants in amounts which will cause obstruction of the flow in the POTW resulting in Interference. [**Optional:** Solid or viscous Pollutants shall not be discharged whole or ground by garbage grinders. This includes, but is not limited to ashes, cinders, sand, oil and grease from food service establishments, mud, straw, shavings, metal, glass, rags, feathers, tar, plastics, wood, underground garbage, paunch manure, hair and flesh, entrails, and paper dishes, cups, milk containers, etc.];
  4. Pollutants, including oxygen-demanding pollutants (BOD, etc.), released in a discharge at a flow rate and/or pollutant concentration which, either singly or by interaction with other Pollutants, will cause Interference with the POTW;
  5. Heat in amounts which will inhibit biological activity in the POTW resulting in Interference, but in no case heat in such quantities that the temperature at the POTW Treatment Plant exceeds 40 °C (104 °F) unless the Approval Authority, upon request of the POTW, approves alternate temperature limits.

<sup>2</sup> The Pretreatment Regulations at 40 CFR 403.5(b)(2) establish a lower pH limit of 5.0, the POTW may establish an upper pH limit based on an evaluation of its collection system and treatment works. However, the establishment of an upper pH limit above 12.5 allows the discharge of characteristic hazardous waste and triggers reporting, as required by 40 CFR 403.12(p) and subsection 4.3 of this ordinance.

# Internal and External Coordination

- City Code Enforcement
- County Hazardous Materials
- Fire Departments
- Planning
- NPDES Inspectors
- Public Works
- Health Department Inspectors





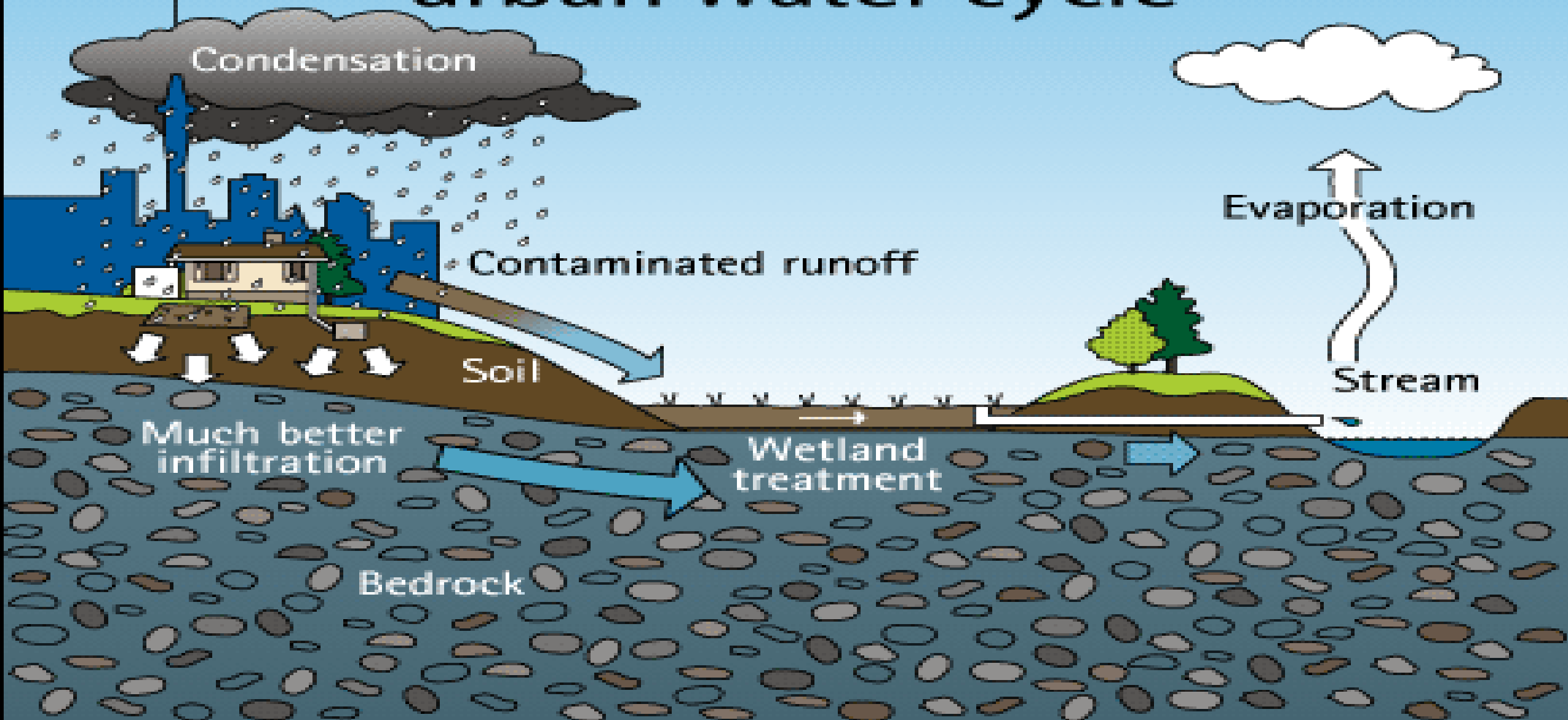
# Overlapping Jurisdictions

There are overlapping jurisdictions, each with its own code and authority:

- Pretreatment Program
- Storm Water - NPDES
- Public Health Authority



# Towards a more sustainable urban water cycle









*That's all Folks!*