

Obstacles to Managing A Successful FOG Program

Western States Alliance 2023 FOG Forum
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Hood River, Oregon



Welcome Everyone

I am the Vice-Chairman for the Georgia Division of the Southeastern FOG Alliance, which encompasses 8 states in the southeast. [Home \(southeasternfogalliance.org\)](http://southeasternfogalliance.org)

State of Georgia Class I Wastewater Operator License (since 1995)

State of South Carolina Class A Physical/Chemical Wastewater Operator License

Bachelor in Psychology

Juris Master in International Law



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Wastewater
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Coordinator



What is the purpose of this presentation?

- 1. What is FOG?**
- 2. Where does FOG come from?**
- 3. Where does FOG end up?**
- 4. Disposal methods of Fats, oils, & grease in the wastewater system.**
- 5. What Obstacles interfere with a successful FOG program?**
- 6. How can these obstacles be managed?**
- 7. Take Aways**

BGJWSC Program information:

- 600 + FSAs
- 2 Industrial Food manufacturing Pretreatment permits (Total 4 permits & 5 waiting approval)
- Household grease waste (not monitored)
- Inspect grease hauler trucks
- Georgia Commercial Hauler Law
- Work with Southeastern FOG Alliance

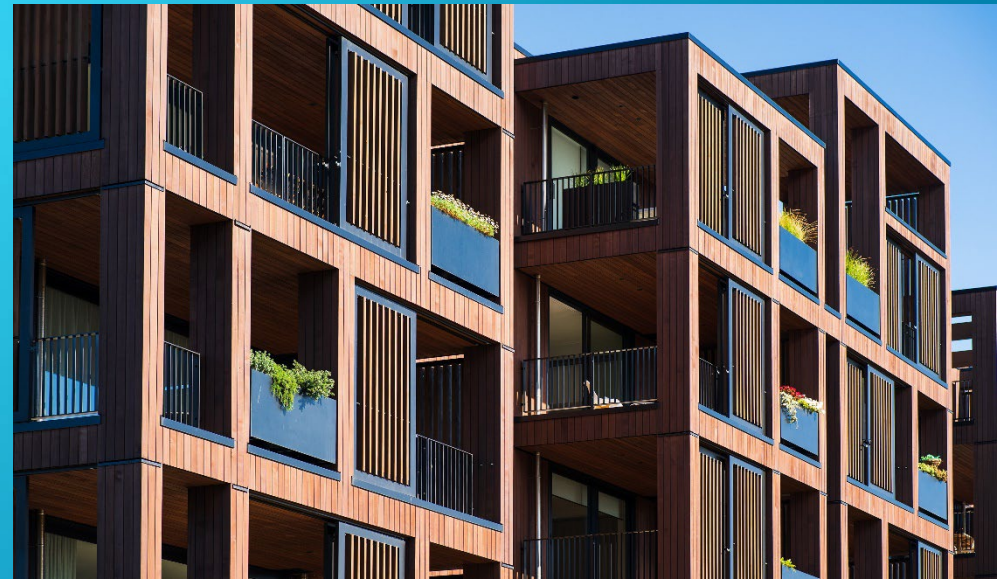
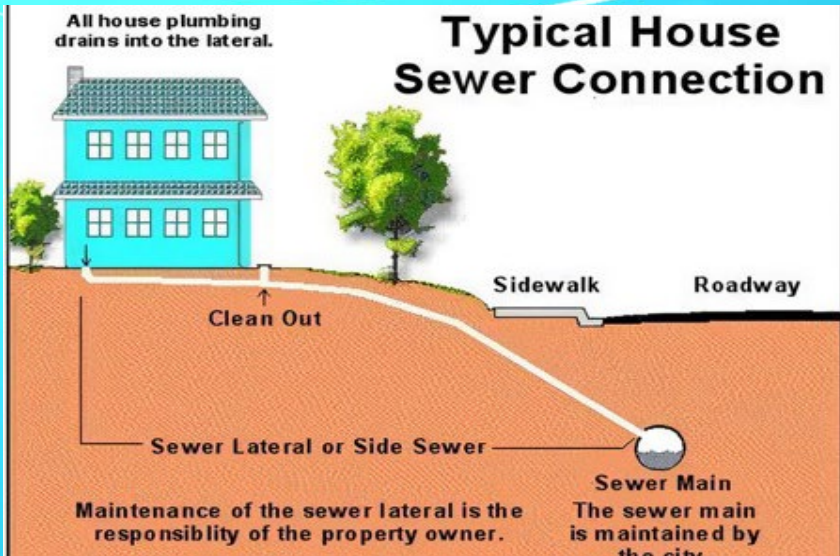


Fats, Oil and Grease means nonpetroleum organic polar compounds derived from animal or plant sources such as fats, nonhydrocarbons, fatty acids, soaps, waxes, and oils that contain multiple carbon chain triglyceride molecules. These substances are detectable and measurable using analytical test procedures established in 40 C.F.R. Part 136.

[Fats, Oil and Grease Definition | Law Insider](#)

What is FOG?

Fats, Oil, & Grease



Where does FOG come from?

Our Homes

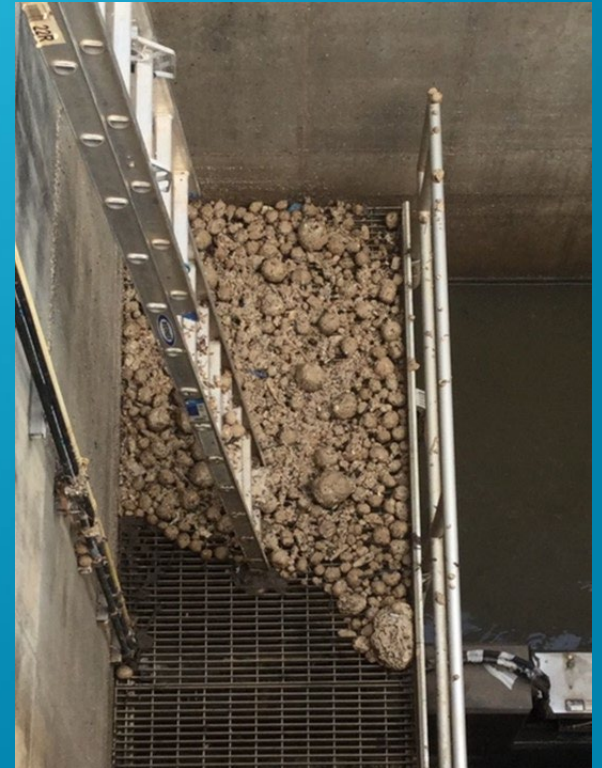


Where does FOG come from?
Commercial Establishments

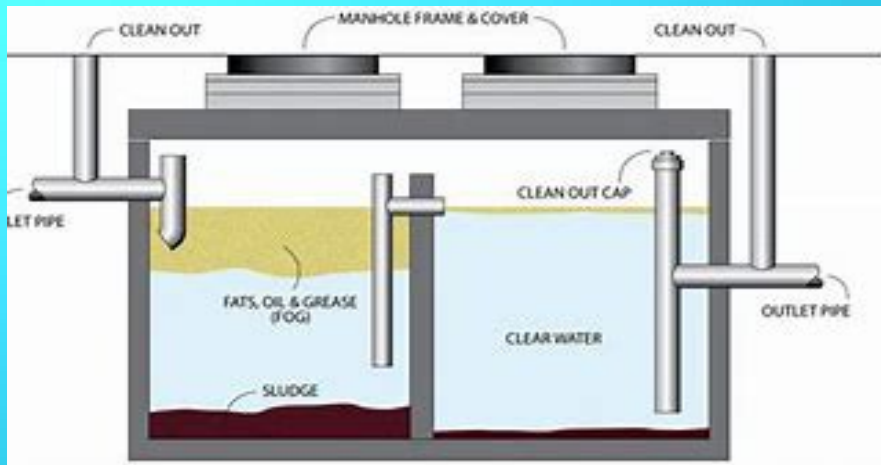
Commercial Grease Haulers



Where does FOG end up?



How is FOG removed from the waste stream?





Why do we remove FOG from the wastewater stream?

1. Save on equipment repairs & staff time
2. Cut costs of sludge disposal- less FOG, less water entrapment
3. Sanitary Sewer Overflows



Not how you remove FOG from the wastewater stream



Disposal methods of Fats, oils, & grease in the wastewater system.

- 1. Landfill:** A municipal solid waste landfill (MSWLF) is a discrete area of land or excavation that receives household waste.
- 2. Land applied:** Land application is defined as the spreading, spraying, injection, or incorporation of sewage sludge, including a material derived from sewage sludge (e.g., compost and pelletized sewage sludge), onto or below the surface of the land to take advantage of the soil enhancing qualities of the sewage sludge.
- 3. Fuel from Anaerobic digesters:** Management of FOG in anaerobic digesters can **reduce environmental impacts by diverting it from landfills** (i.e., the conventional method for FOG management), while enabling energy recovery in the form of increased biogas production from the additional substrate (Alqaralleh et al., 2016).
- 4. Biodiesel from brown grease separation:** Some companies are now separating out the brown grease and converting it to a useful biodiesel that has value.

What Obstacles Interfere with a Successful FOG Program?

- **Food Service Establishment (FSE) Owners/Managers**
- **Insufficient local regulations/enforcement**
- **Lack of Training and sufficient staff**
- **Commercial Haulers**
- **Disposal Locations disappearing**
- **Cost associated with compliance for FSEs & commercial haulers**
- **Interference from government officials**
- **Lies, Lies, Lies**

What Obstacles Interfere with a Successful FOG Program?

Food Service Establishment (FSE) Owners/Managers

- 1) **Not adhering to pump out schedule established by utility**
- 2) **Not keeping proof of manifests of pump outs**
- 3) **Not repairing damaged grease interceptors**
- 4) **Putting wrong items into the grease interceptor**
- 5) **Not registering with required database for compliance monitoring**
- 6) **Blaming someone else for past due pump outs**



What Obstacles Interfere with a Successful FOG Program?

Insufficient local regulations/enforcement:

City Ordinance Chapter 22 UTILITIES Updated 4-29-2020.pdf (bgjwsc.org)

CHAPTER 2 16 (bgjwsc.org)

SKM C360i22061709390 (bgjwsc.org)

SECTION-5-DETAILS-Updated-01-2022.pdf (bgjwsc.org)

What Obstacles Interfere with a Successful FOG Program?

Lack of Training and sufficient staff:

- 1) **How many here were given this FOG inspector position with no training?**
- 2) **National Pretreatment Program - Controlling Fats, Oils, and Grease Discharges from Food Service Establishments (epa.gov)**
- 3) **Sufficient staff are needed to complete inspections, input manifest data, complete written warnings, NOV, and issue fees and Fines. Most programs are understaffed because there isn't a problem until there is an SSO caused by FOG.**
- 4) **Know your regulations: federal, state and local (in most states, state and local regulations can be stricter than federal regs, but they cannot be laxer than the federal regs.**
- 5) **Seek out other inspectors or groups like SEFA for help if you are unsure where to start.**

What Obstacles Interfere with a Successful FOG Program?

Commercial Haulers:

- 1) Waste Transporter (southeasternfogalliance.org)
- 2) http://www.legis.state.ga.us/legis/2003_04/fulltext/sb568.htm (southeasternfogalliance.org)
- 3) Proper cleaning of grease interceptor, proper disposal of waste
- 4) Inform regulatory agency of interceptor damage
- 5) Cost of transporting & disposing of FOG waste

What Obstacles Interfere with a Successful FOG Program?

Disposal Locations disappearing:

- 1) Higher costs for pump outs
- 2) Increased time for disposal
- 3) Less interceptors pumped
- 4) Most POTWs do not accept FOG waste
- 5) Higher possibility of illegal dumping
- 6) Find new methods of disposal/reuse to increase profits

What Obstacles Interfere with a Successful FOG Program?

Cost associated with compliance for FSEs & commercial haulers:

- 1) **High cost of install of adequate capacity for FSEs**
- 2) **Fees & Fines for failure to pumpout grease interceptor on schedule**
- 3) **Haulers face fines up to \$1000.00 per occurrence for out of date inspection or leaking FOG waste**
- 4) **Haulers can have permits pulled for violating regulations**

What Obstacles Interfere with a Successful FOG Program?

Interference from government officials:

- 1) **Customers call commissioners, commissioners call the executive director, and then you (the inspector) get to explain your actions to your director.**
- 2) **Decisions being made in opposition to your requirements/regulations**
- 3) **Customers threatening your job if you try to enforce the regulations**

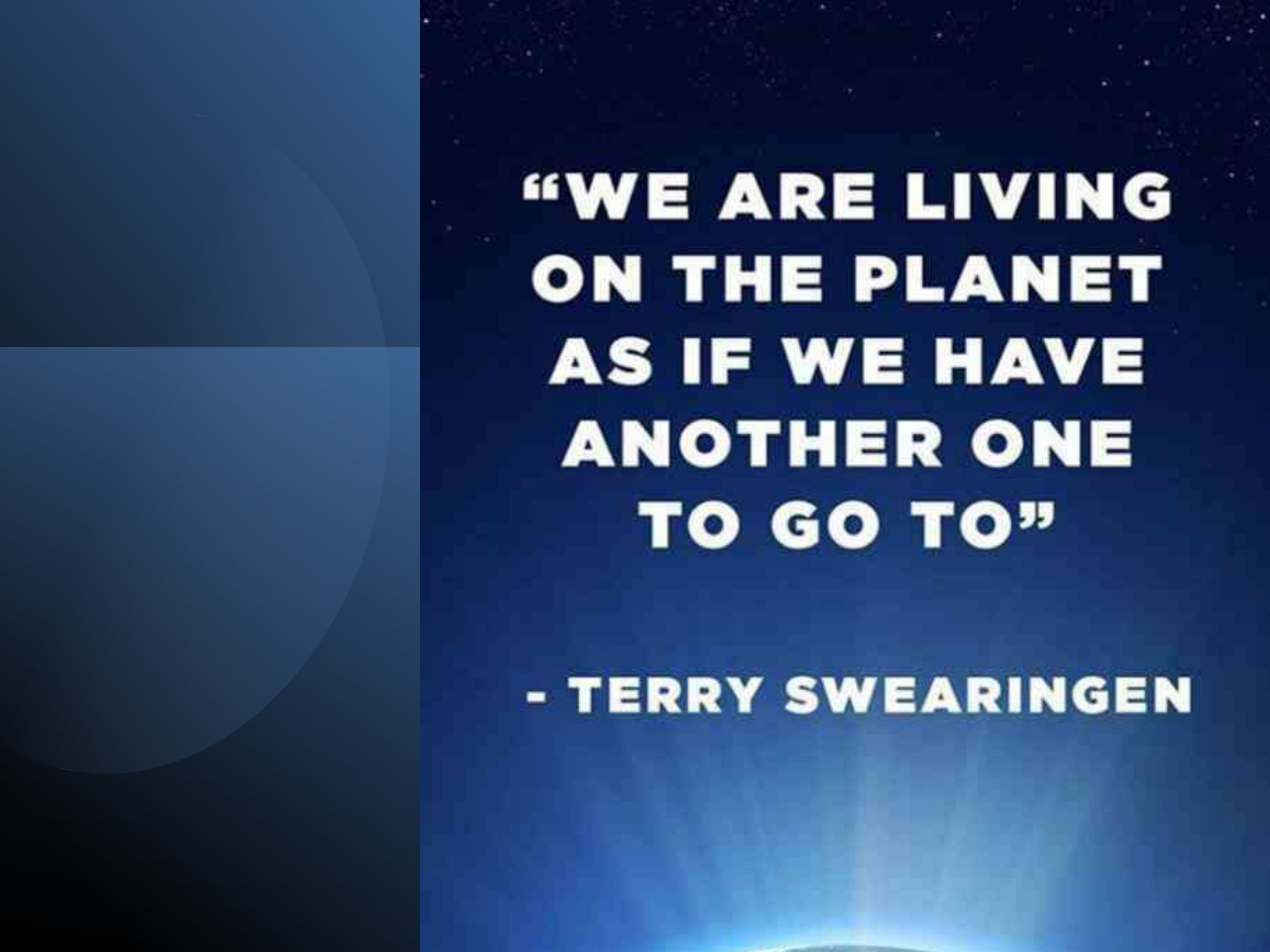
What Obstacles Interfere with a Successful FOG Program?

Lies, Lies, Lies:

- 1) The hauler quit coming to pump the interceptor
- 2) I didn't know we had a grease interceptor
- 3) Utility was supposed to pump out the grease interceptor
- 4) I just had it pumped last week
- 5) We don't have grease because we don't fry
- 6) Location just for take out/ installs 30 seats
- 7) I didn't receive your NOV/install letter
- 8) I don't remember you telling me that requirement
- 9) I was told by dph/plumber that I do not need a grease interceptor

Take Aways: To overcome obstacles

- **Educate yourself on regulations, so you make informed decisions**
- **Invest in a FOG management database or service (I use swift comply-which allows FSEs & haulers to input manifests)**
- **Be consistent and fair in your enforcement, so you can defend your decisions against scrutiny.**
- **Use resources to your advantage; like meeting haulers onsite to inspect interceptors while empty, having good communication with contractors, plumbers and businesses.**
- **Keep a good working relationship with other governmental agencies, commercial haulers and disposal sites.**
- **Discuss staffing issues with management; ask them to ride with you for a day and/or explain what part of your work goes lacking.**
- **When able push for better disposal methods to cut cost for both haulers and FSEs.**
- **Find ways to combat problem FSEs; increase pump out schedules for late pumpers, issue NOVs and require additional capacity for problem locations.**



**“WE ARE LIVING
ON THE PLANET
AS IF WE HAVE
ANOTHER ONE
TO GO TO”**

- TERRY SWEARINGEN



- Thank you
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