

GOLDEN TRIANGLE OR BERMUDA TRIANGLE?

A GUIDE TO NAVIGATING OVERLAPPING JURISDICTIONS
IN GREASE INTERCEPTOR ENFORCEMENT

JILL HOYENGA, CITY OF THE DALLES

2023 FOG FORUM, UPDATE INCLUDES CASE STUDIES

WHERE AM I COMING FROM?

25 years of navigating water conservation, backflow prevention regulations and pretreatment

- **8 years chair of what became the Irrigation Association Smart Water Application Technology Initiative**
 - Lead writer for Marketing Committee for promoting water efficient irrigation products specifications and third-party testing of irrigation products
- **8 years chair of Alliance for Water Efficiency WaterSense and Water-Efficient Products Committee**
 - Often lead writer for comments on EPA WaterSense specifications
- **Several legislative sessions working with lobbyists to modify backflow and cross connection control legislation**
- **Several rounds of monitoring and commenting on Oregon Administrative Rules for backflow/cross connection and water conservation**
 - Certified Cross Connection Specialist & Instructor
 - Community College Adjunct Professor – Commercial & Industrial Water Conservation
- **3 years served on the IAPMO Green Plumbing and Mechanical Code (now a standard)**
 - Served as Irrigation Working Group Chair for part of that time
- **2 years served on the AWWA Standards Council (representing water conservation)**
- **5+ years of experience parsing pretreatment ordinance, code, OAR, 40 CFR 403**

CHARTING TODAY'S COURSE

- How a jurisdiction is defined
- Grease interceptor jurisdictions
- Successful navigation of overlapping jurisdictions
- Case studies



DEFINING A JURISDICTION

BUOYAGE MARKS AND SYSTEMS FOR NAVIGATION

REGION A IALA BUOYAGE Europe & the Mediterranean

PORT HAND MARK
Light, Red
Any rhythm except Fl(2+1)

LATERAL MARKS
Indicate sides of a navigable channel.

STARBOARD HAND MARK
Light, Green
Any rhythms except Fl(2+1)

CARDINAL MARKS
Used to indicate the direction of the safest navigable water from the mark.
Can be used singly or in groups.

North Cardinal
Light, White
Very Quick or Quick Continuous.
(Pass to the North)

West Cardinal
Light, White
VQ(9) 10s or Q(9) 15s
(Pass to the West)

East Cardinal
Light, White
VQ(3) 5s or Q(3) 10s
(Pass to the East)

South Cardinal
Light, White
VQ(6) + L Fl 10s or Q(6) + L Fl 15s
(Pass to the South)

Hazard

EMERGENCY WRECK MARKS
Light, Alternating Blue and Yellow 3s.
3 seconds

PREFERRED CHANNEL MARKS

Preferred Channel to Starboard
Light, Fl(2+1) Red

Preferred Channel to Port
Light, Fl(2+1) Green

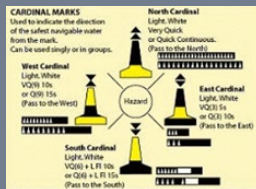
ISOLATED DANGER MARK
Marks a danger with navigable water all round.
Light, White, Fl(2)

SAFE WATER MARKS
Landfall or Mid Channel
Light, White, L Fl 10s, Morse(A) Isophasing or Occulting.

SPECIAL MARKS
Used to indicate special features.
Shape optional, topmark optional.
Light, Yellow with rhythm that differs from other marks.

SHORT HISTORY OF PLUMBING LEGISLATION

- Plumbing laws and codes were created to protect public health and save lives
- High density population centers would not be possible without modern plumbing (potable water in, wastewater out)
- Ancient civilizations pioneered piped water and sewer systems
- First modern model code: Public Health Act of 1848 (UK)¹
 - Established a General Board of Health to guide sanitary matters
 - Followed by other acts over the next several years to regulate sewage and water supply



¹Source :Encyclopedia Britannica (britannica.com) Retrieved 10/20/2017

US BUILDING CODE ORGANIZATIONS

- **International Code Council (ICC) 1994 consolidation of three regionally-based model code organizations²**
 - Building Official and Code Administrators (Founded in 1915, Northeast and North Central), International Conference of Building Officials (Founded 1922, West Coast and North Central) and the Southern Building Code Congress International (Founded 1940, Southeast)
- **International Association of Plumbing and Mechanical Officials (IAPMO)³**
 - Established in 1926
- **American National Standards Institute (ANSI)⁴**
 - Established 1918
 - Process for facilitating voluntary consensus standards



² Say “Hello” to the International Building Code (IBC) Nelson & Associates 2002

³ About the IAPMO Group Retrieved 10/20/2017

⁴ <https://www.iccsafe.org/codes-tech-support/topics/plumbing-mechanical-and-fuel-gas/international-plumbing-code-ipc-home-page/> 10/20/2017

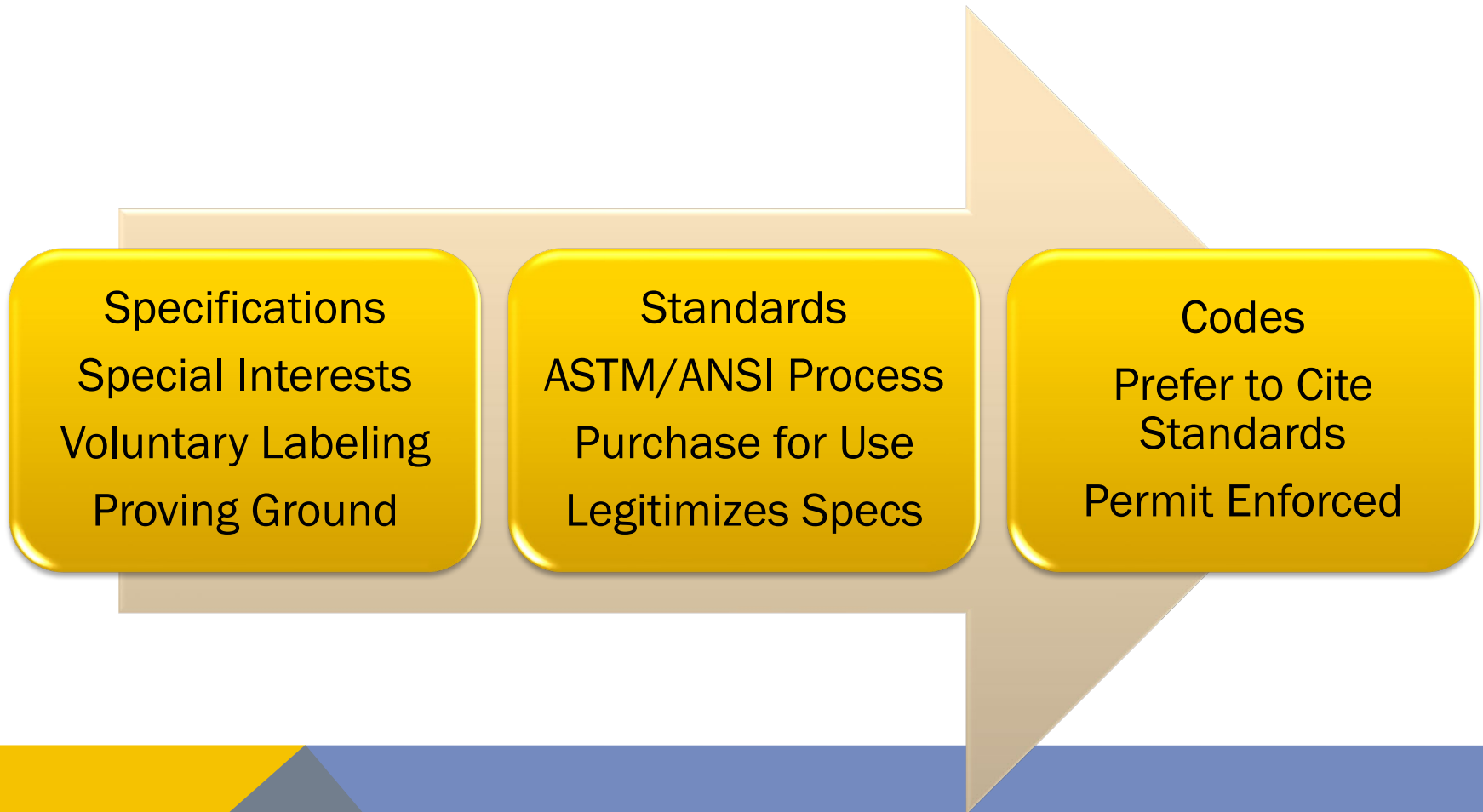
SCOPE: SPECS, STANDARDS AND CODES

- **Guidance or requirements for the built environment**
 - **Specifications** may address installation as well as fixtures or appurtenances
 - **Standards** usually address requirements for manufacture of fixtures or appurtenances
 - **Codes** usually address requirements for installation of pipe that connects fixtures and appurtenances
- **Training issues are addressed:**
 - Licensing (Apprentice and Journey)
 - Professional certifications
 - Professional certificate courses
- **Maintenance issues are addressed:**
 - Manufacturers recommendations
 - Best Management Practices (BMPs)



Appurtenance: A manufactured device, a prefabricated assembly, or an on-the-job assembly of component parts that is an adjunct to the basic piping system and plumbing fixtures. An appurtenance demands no additional water supply, nor does it add any discharge load to a fixture or the drainage system. It performs some useful function in the operation, maintenance, servicing, economy, or safety of the plumbing system.(IAPMO 2009)

TRANSITIONS: SPECS, STANDARDS AND CODES



This is the general progression of specifications, standards and codes. Each transition increases the ability to enforce.

STANDARDS & CODE DEVELOPMENT = BIG BUSINESS

- Competitive market for manufacturing requirements, levels the playing field
- If you wish to influence standards & codes
 - Choose whether your change is to a fixture or appurtenance (standards) or to the piping (codes)
 - Make time to understand the market
 - Follow the money to your ally
- In the U.S. there has often been a East/West divide
- When East Coast and West Coast values collide:
 - Federal legislation tends to sway toward East Coast values
 - State legislation tends to sway toward the region
 - Occasionally courts will decide the issue
 - Usually rulings uphold States rights



GREASE INTERCEPTOR STANDARDS⁵

Standard	Publisher	Type of interceptor covered
PDI G-101	Plumbing and Drainage Institute	Passive Hydromechanical Grease Interceptor (HGI)
PDI G-102	Plumbing and Drainage Institute	Grease Interceptor Sensing and Alarm Devices
ASME A112.14.3	American Society of Mechanical Engineers	Passive Hydromechanical Grease Interceptor (HGI)
ASME A112.14.4	American Society of Mechanical Engineers	Automatic Grease Removal Device (GRD)
ASME A112.14.6	American Society of Mechanical Engineers	FOG (fats, oils and greases) Disposal Systems
CSA B481	Canadian Standards Association	Passive Hydromechanical Grease Interceptor (HGI)
IGC 273	International Association of Plumbing and Mechanical Officials	Passive Hydromechanical Grease Interceptor (HGI)
ASTM C1613	ASTM International	Precast Concrete Gravity Grease Interceptor (GGI)
IAPMO/ANSI Z1001	International Association of Plumbing and Mechanical Officials	Prefabricated Concrete Gravity Grease Interceptor (GGI)

Appurtenance: A manufactured device, a prefabricated assembly, or an on-the-job assembly of component parts that is an adjunct to the basic piping system and plumbing fixtures. An appurtenance demands no additional water supply, nor does it add any discharge load to a fixture or the drainage system. It performs some useful function in the operation, maintenance, servicing, economy, or safety of the plumbing system. (IAPMO 2009)



⁵Source :The Standards That Govern Grease Interceptors (All Types) in North America, June 2014 (schierproducts.com) Accessed 6/26/2018

GREASE INTERCEPTOR STANDARDS

- **The Plumbing Drainage Institute (PDI) standard includes a performance test**
 - The interceptor must hold at least twice the flow rate in pounds of grease before pass-through occurs
 - Test medium is melted lard
 - Example:
 - Interceptor flow rate: 50 gallons per minute
 - Must hold at least 100 pounds of lard
- **The American Society of Mechanical Engineers also has a grease interceptor standard includes this test as a minimum for certification but also tests maximum holding capacity⁶**
 - PDI testing now includes the option to test maximum capacity for added cost to the manufacturer

Appurtenance: A manufactured device, a prefabricated assembly, or an on-the-job assembly of component parts that is an adjunct to the basic piping system and plumbing fixtures. An appurtenance demands no additional water supply, nor does it add any discharge load to a fixture or the drainage system. It performs some useful function in the operation, maintenance, servicing, economy, or safety of the plumbing system. (IAPMO 2009)



⁶Source : Curtis Clowers, Shier Products Pacific Northwest Sales Representative. Interviewed 1/22/2019

EXAMPLE: INFLUENCE GREASE INTERCEPTOR MODEL CODE

- Problem: Selection of grease interceptor size by plumbing code is often too small for the application (e.g. 30 gpm grease interceptor for a fast food restaurant)
- Solution: Select grease interceptor by grease production instead of flow based on fixture count
 - Selection of grease interceptor is a code issue not a standards issue
 - There is a standard that tests for maximum capacity
 - There is a plumbing engineer and manufacturer methodology to determine grease production
- Follow the money to your ally:
 - Manufacturers or an association of manufacturers
 - Green plumbing code developers that are working on commercial kitchen efficiency (e.g. IAPMO WESstand)
 - Wastewater utilities have an interest in avoiding substantial fines



ANSI Project Initiation Notification System (PINS) Process reduces confusion by allowing any organization to apply for exclusive rights to develop a standard. Requires due process during development.

LEGISLATION AND RULEMAKING

Administrative Procedures Act 1946

- [EPA Summary](#)
- Cornell Law Legal Information Institute
 - [5 U.S. Code Title 5 Part I Chapter 5 Subchapter II § 552](#)

Rulemaking vs. adjudication

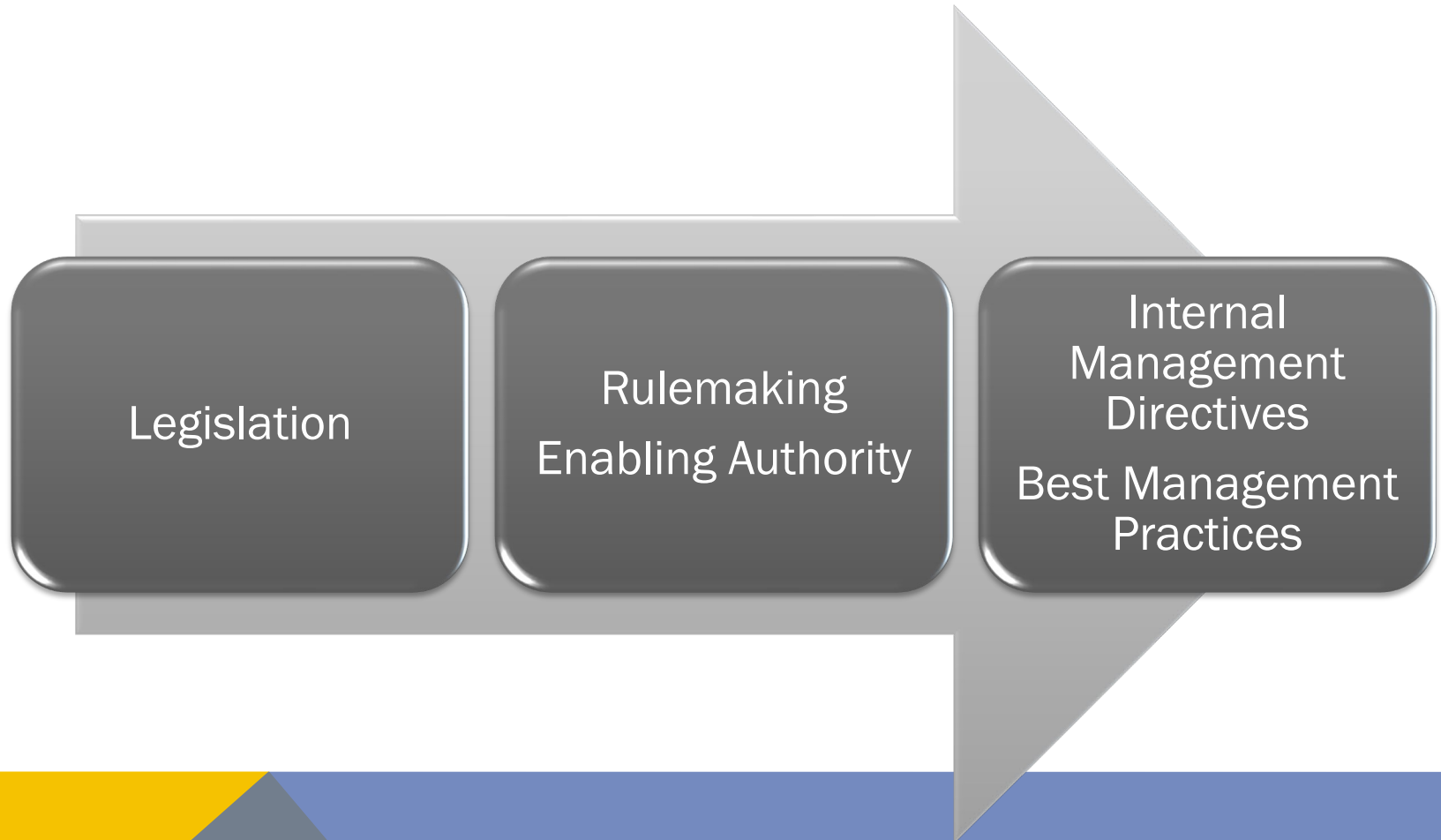
- Supreme Court rulings have supported both processes

Internal Management Directive (IMD)

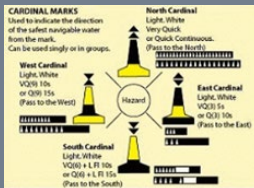
- [State of Oregon Summary](#)



TRANSITIONS: LEGISLATION, RULEMAKING, IMD/BMP



This is the general progression of pretreatment guidance and requirements development. Each transition decreases the ability to enforce.



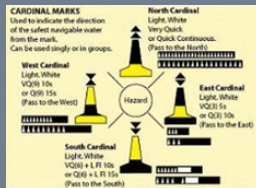
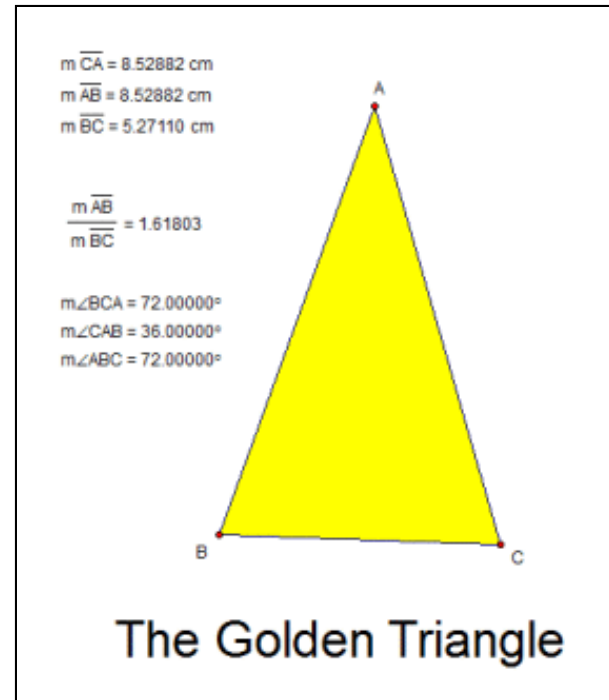
GREASE INTERCEPTOR JURISDICTIONS

SAILING INTO THE DEVIL'S TRIANGLE?

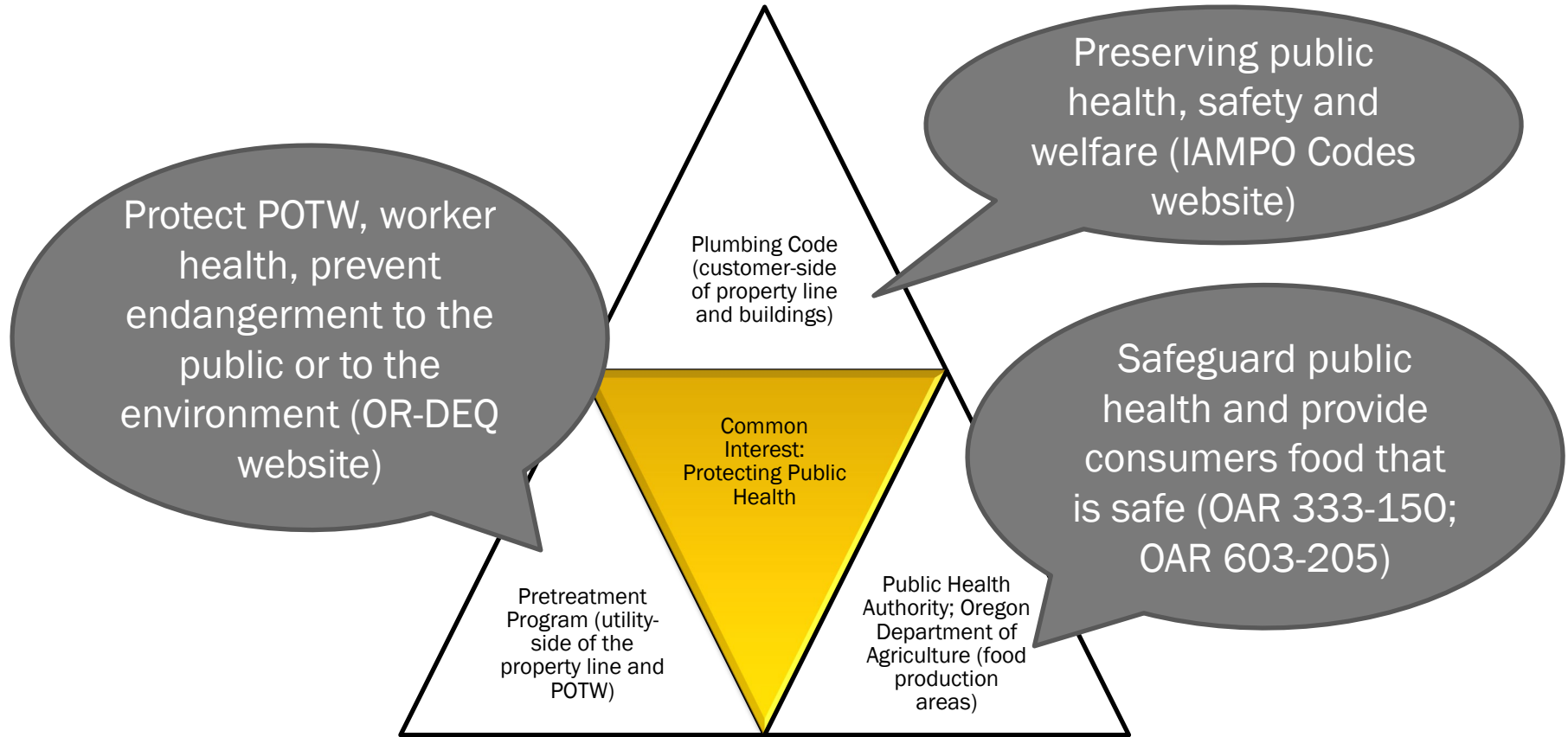


GOLDEN TRIANGLE

- The sublime triangle
- Proportions of the sides of the triangle are an equality of type
- Each side in a harmonious relationship with the other sides

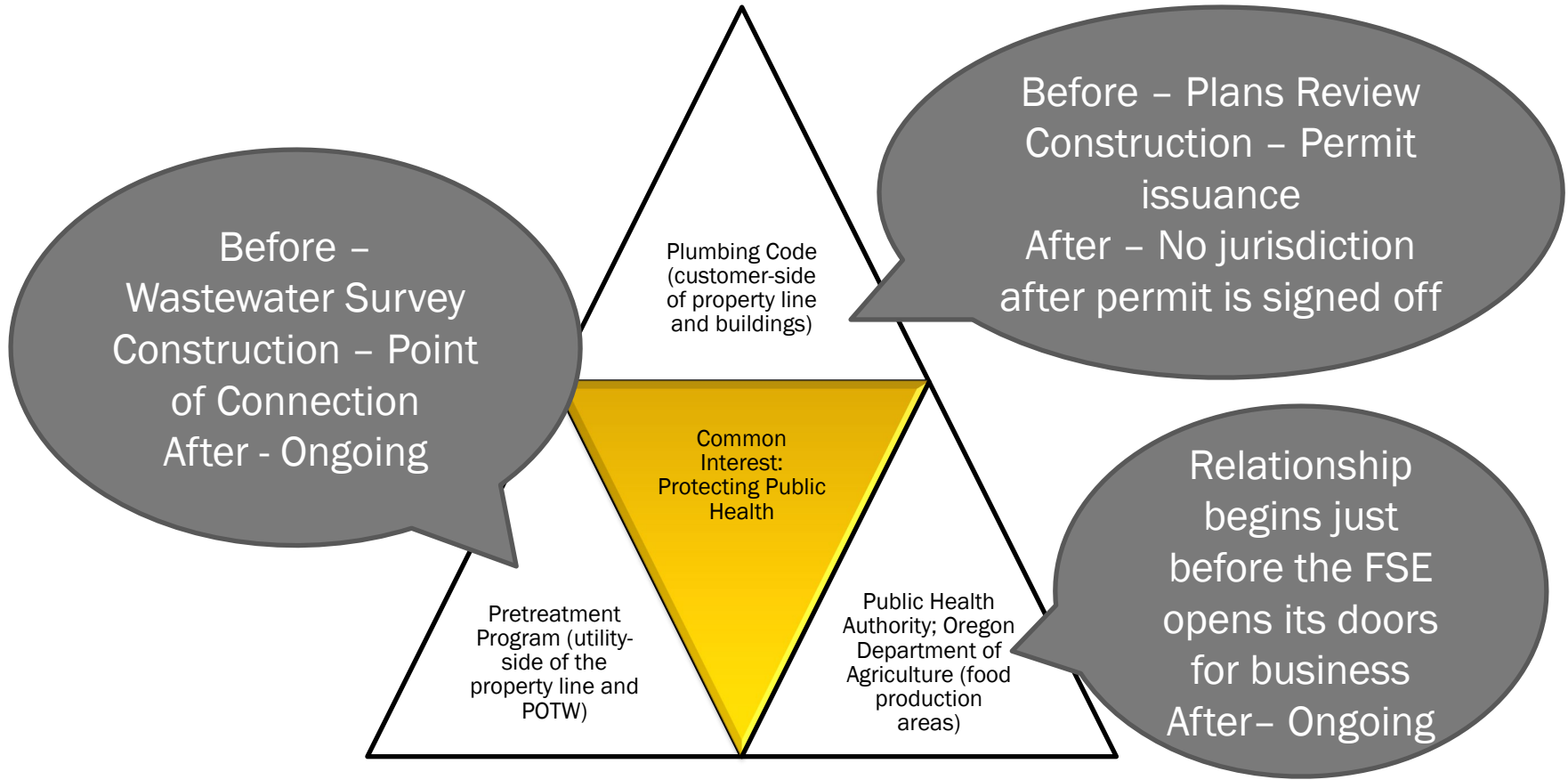


OVERLAPPING JURISDICTIONS



A common interest can be a foundation for coordination between jurisdictions

JURISDICTIONAL RELATIONSHIP WITH CUSTOMER



Institutional kitchens such as nursing homes, hospitals, day care centers, church soup kitchens and schools may be inspected by a different agency or not inspected at all.

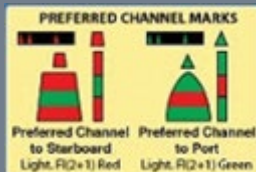
CHAPTER & VERSE: PLUMBING CODE

Citation: Chapter 1: Administration

102.2 Existing Installations. Plumbing system lawfully in existence at the time of the adoption of this code shall be permitted to have their use or repair continued where the use or repair is in accordance with the original design and location and no hazard to life, health or property has been created by such a plumbing system.

102.3 Additions, Alterations, Renovations, or Repairs. Additions, alterations, renovations or repairs shall conform to that required for a new system without requiring that the existing plumbing system to be in accordance with the requirements of this code. Additions, alterations, renovations, or repairs shall not cause an existing system to become unsafe, insanitary, or overloaded.

Advisory: 102.2 was cited as the reason that retrofit or relocation of a grease interceptor could not be required by a plumbing inspector. However, some of the wording from this chapter may be useful for inclusion in an enforcement letter that suggests consulting a plumber.



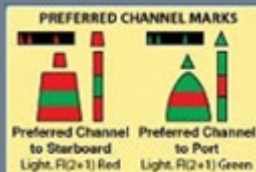
I do not recommend using citations from sources outside of your jurisdiction. However, words such as unsafe, insanitary, or overloaded are general use words that will be recognized as describing a situation that must be remedied across jurisdictions.

CHAPTER & VERSE: PLUMBING CODE

Citation: Chapter 8: Indirect Wastes

810.1 High Temperature Discharge. No steam pipe shall be directly connected to a plumbing or drainage system, nor shall water having a temperature above 140° F (60° C) be discharged under pressure directly into a drainage system. Pipes from boilers shall discharge by means of indirect waste piping, as determined by the Building Official or the boiler manufacturer's recommendations. Such pipes shall be permitted to be indirectly connected by discharge into an open or closed condenser or an intercepting sump of an approved type that will prevent the entrance of steam or such water under pressure into the drainage system.

Advisory: This chapter only applies to water discharged under pressure (high temperature dishwasher). I was advised that this chapter cannot be applied to non-pressurized high temperature discharge (wok cooking station).



This provision has been in place since the 1980's. Chapter 10 was changed in 2014 to require dishwashers to discharge into a grease interceptor. Hot water dishwashers must be installed such that water cools before entering the interceptor.

CHAPTER & VERSE: PLUMBING CODE

Citation: Chapter 10: Traps and Interceptors

1009.2 Approval. The size, type, and location of each interceptor (clarifier) or separator shall be approved by the Building Official.

1009.5 Location. Each interceptor (clarifier) cover shall be readily accessible for servicing and maintaining the interceptor (clarifier) in working and operating condition. The use of ladders or the removal of bulky equipment in order to service interceptors (clarifiers) shall constitute a violation of accessibility.

1014.3.4.1 Interceptors. Interceptors shall be placed as close as practical to the fixtures they serve.

Advisory: Use caution when discussing where the interceptor is located.

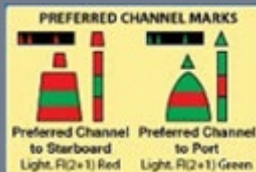
UPC Traps vs. Interceptors⁶

Until 1997, a grease trap was allowed to be used as a single fixture trap and were engineered to provide a water seal.

In 2000, traps were no longer approved for use as a fixture trap and water seal properties were removed from the standard.

In 2006 UPC eliminated the term “grease trap” and introduced the term “hydromechanical grease interceptor (HGI)”

Plumbing Officials do not use the term grease trap because it is not a “trap”.



CHAPTER & VERSE: PLUMBING CODE

Citation: Chapter 10: Traps and Interceptors

1014.0 Grease Interceptors.

1014.1 Where Required. Waste pretreatment is required in all Food Service Establishments. Waste pretreatment is also required in other establishments as determined by the Building Official, where grease is introduced into the drainage or sewer system. An approved type of grease interceptor(s) complying with the provisions of this section shall be correctly sized and properly installed.

All plumbing fixtures, garbage disposals, dishwashers, floor drains, and cooking equipment, with drain connections in food and/or beverage preparation areas of all Food Service Establishments shall be connected to the grease interceptor(s).

Advisory: Do not cause the customer to question what equipment discharges into the grease trap.

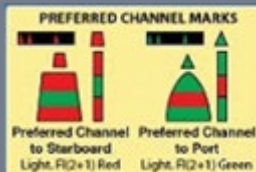
IPC Traps vs. Interceptors⁶

Until 2006, the IPC defined grease traps with a rated flow of 50 gpm or less while a grease interceptor had a rated flow exceeding 50 gpm.

The grease trap was designed allowed to serve as a single fixture trap.

In 2009, the term “grease trap” was removed but if designed to serve as a trap, was allowed to be installed as such.

Several new terms added in 2012 and 2015 compound the confusion regarding traps/interceptors.



⁶Source :Grease Interceptors Are Not Called Traps Anymore, December 2014 (schierproducts.com) Accessed 6/26/2018

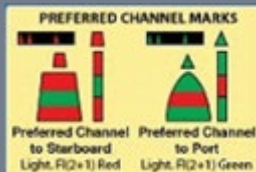
CHAPTER & VERSE: PUBLIC HEALTH AUTHORITY

- Recall, the Oregon Plumbing Specialty Code specifically prohibits the plumbing inspector from bringing existing plumbing that was approved under an earlier version of code to the standards of current code with a very narrow exception.
- However, the Oregon Health Authority Food Sanitation Rules allow the public health inspector require a food service establishment to replace equipment or bring it up to current code under certain conditions.

Citation: OAR 333-150- Chapter 8 Code Applicability. Subpart 3 Permit to Operate. Section 304 Conditions of Retention. Subsection 11 Responsibilities of the Permit Holder.

(G) Replace existing facilities and equipment specified in § 8-101.10 with facilities and equipment that comply with this [Food Sanitation] Code if:

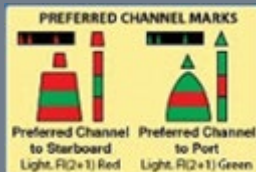
- (1)** The regulatory authority directs the replacement because the facilities and equipment constitute a public health hazard or nuisance or no longer comply with the criteria upon which the facilities and equipment were accepted,
- (2)** The regulatory authority directs the replacement to meet current code requirements after the food establishment has been closed for a minimum of six consecutive months



ADVISORY: PUBLIC HEALTH AUTHORITY

Advisory: It is worth giving your local public health official a call if you have a grease interceptor issue that requires retrofit.

- Make sure that you can make a case that the grease interceptor installation constitutes a public health hazard or nuisance or no longer complies with the criteria upon which the facilities and equipment were accepted
- Recall, the public health authority cannot assist you with cases that only pose a threat to the environment (e.g. sanitary sewer overflows in the collection system)



CHAPTER & VERSE: PUBLIC HEALTH AUTHORITY

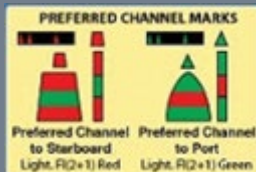
Citation: Oregon Health Authority Food Sanitation Rule OAR 333-150- Chapter 4 Equipment, Utensils, and Linens. Subpart 5 Maintenance and Operation. Section 501 Equipment. Subsection 110. Mechanical Warewashing Equipment, Wash Solution Temperature.

Citation: Oregon Department of Agriculture OAR 603-025-0030 Chapter 4 4-501.110

(A) The temperature of the wash solution in spray type warewashers that use hot water to sanitize may not be less than:

- (1) For a stationary rack, single temperature machine, 74° C (165° F);Pf
- (2) For a stationary rack, dual temperature machine, 66° C (150° F); Pf
- (3) For a single tank, conveyor, dual temperature machine, 71° C (160° F);Pf or
- (4) For a multitank, conveyor, multi temperature machine, 66° C (150° F).Pf

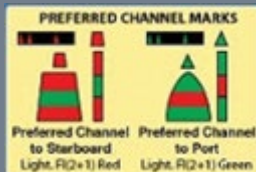
(B) The temperature of the wash solution in spray-type warewashers that use chemicals to sanitize may not be less than 49° C (120° F).



ADVISORY: PUBLIC HEALTH AUTHORITY

Advisory: Do not assume that a dishwasher uses water hotter than 140-degrees. Most small establishments use chemical sanitation rather than hot water sanitation type dishwashers because they are cheaper to operate.

- Commercial dishwasher using chemical sanitation typically discharges 100-degrees F (though according to OAR it would discharge no less than 120-degrees F)⁷
- Commercial dishwasher using hot water sanitation typically discharges 180-degree F⁷
- Commercial dishwasher using hot water sanitation usually have an inline temperature gauge
- Recall, Oregon Specialty Plumbing Code 810.1 High Temperature Discharge, requires water over 140°F that is under pressure to be indirectly connected by discharge into an open or closed condenser or an intercepting sump of an approved type that will prevent the entrance of steam or such water under pressure into the drainage system.



⁷Source :Alliance for Water Efficiency, Introduction to Commercial Dishwashers (n.d.) (allianceforewaterefficiency.org) Accessed 6/26/2018

CHAPTER & VERSE: PUBLIC HEALTH AUTHORITY

2020 Updated Citation for FSE and Mobile Food Units: Oregon Health Authority Food Sanitation Rule OAR 333-150- Chapter 5 Water, Plumbing and Waste, Subpart 4 Sewage, Other Liquid Waste, and Rainwater.

2020 Updated Citation for Retail Food Service: Oregon Department of Agriculture OAR 603-025- Chapter 5 Water, Plumbing and Waste, Subpart 4 Sewage, Other Liquid Waste, and Rainwater.

5-402.10 Establishment Drainage System.

Food establishment drainage systems, including grease traps, that convey sewage shall be designed and installed as specified under 5-202.11(A).

5-202.11 Approved System and Cleanable Fixtures.

(A) A plumbing system shall be designed, constructed, and installed according to law.

5-402.12 Grease Trap.

If used, a grease trap shall be located to be easily accessible for cleaning.

- The Public Health Authority should be called immediately if a grease trap has caused a sewer back-up or overflow within a facility.
- If the facility is a retail food establishment, also call the Department of Agriculture.



CHAPTER & VERSE: PUBLIC HEALTH AUTHORITY

Citation for Mobile Food Units: Oregon Health Authority Food Sanitation Rule OAR 333-162- INSPECTION AND LICENSING PROCEDURES MOBILE FOOD UNITS, COMMISSARIES AND WAREHOUSES .

333-162-0920 Plan Review

- (1) Newly constructed or extensively remodeled mobile food units, commissaries and warehouses must undergo plan review and a pre-operational inspection.



HOW TO GET YOUR FOOD CART LICENSED IN WASCO COUNTY (NORTH CENTRAL PUBLIC HEALTH DISTRICT)

Step 1: Plan Review

- Business owner must first obtain a plan review.
- Complete and return the plan review packet with the appropriate fee.
- An environmental health specialist will review the application and either approve or ask for more details.

Step 2: Application

- After the plan has been approved, begin construction on the unit.
- Submit a mobile unit application and signed wastewater and restroom agreement.
- Its important to plan where you will dispose of your wastewater or provide documentation if the unit will be hooking up to municipal sewer.

Step 3: Inspection

- Once construction and forms are complete, call to arrange a pre-opening inspection.
- The business must receive and pass the pre-opening inspection before opening.
- After a food service license has been acquired, the unit will receive its first full inspection within a few weeks.



INSPECTIONS CONDUCTED EVERY SIX MONTHS

MFU Water and Sewage is now on the OHA inspection checklist updated in February 2020

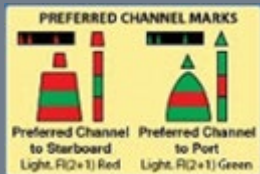
- Sewage holding tank capacity and drainage
- Backflow prevention
- Grease trap
- Approved sewage disposal

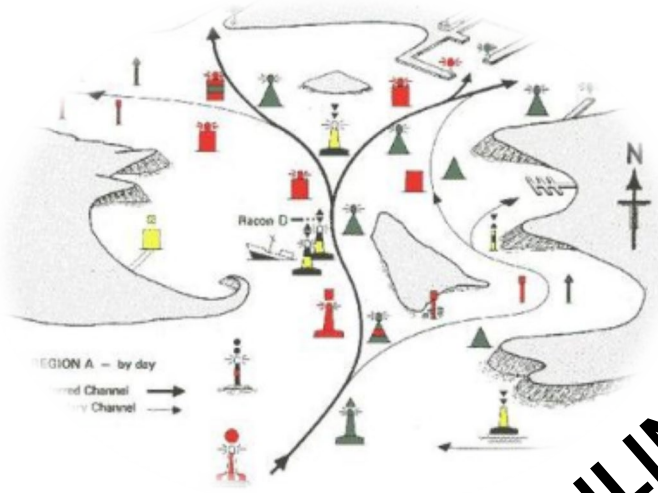
Health District Inspectors know more about grease traps, they know the questions to ask



PRETREATMENT PROGRAM

- USEPA Pretreatment Regulations Title 40 CFR Part 403
- OAR 340-45-0063
- Local Enabling Authority approved by Oregon Department of Environmental Quality
 - The Dalles Municipal Code 4.12 Pretreatment





SMOOTH SAILING IN THE GOLDEN TRIANGLE, DECK LOG

THE DALLES MUNICIPAL CODE 4.12 PRETREATMENT

CASE STUDIES



CASE OF THE MISSING GREASE INTERCEPTOR

PUBLIC HEALTH DISTRICT INITIATED ENFORCEMENT

WHERE DID IT GO?

- An email from the local Public Health District notifying the City that a grease interceptor had been removed.
 - Identified the removal during a routine six month inspection
- Recall the Public Health District jurisdiction:

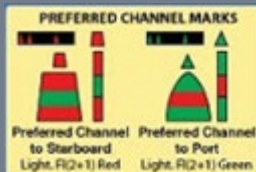
5-402.12 Grease Trap.

If used, a grease trap shall be located to be easily accessible for cleaning.

Due to relationship building, the Public Health District knew to ask for help from the City

DOES THE PLUMBING INSPECTOR KNOW?

- A search of the plumbing permit database showed no permit had been issued.
- Called plumbing inspector to verify. Yup, no permit. Not aware of removal.
- Recall the Plumbing Official's jurisdiction:
- **102.3 Additions, Alterations, Renovations, or Repairs.** Additions, alterations, renovations or repairs shall conform to that required for a new system without requiring that the existing plumbing system to be in accordance with the requirements of this code. Additions, alterations, renovations, or repairs shall not cause an existing system to become unsafe, insanitary, or overloaded.



Wasco County Building Codes Compliance Operating Plan

Reports of work being performed without permit, in violation of WCBCS, and/or in violation of ORS 479.550, 479.620, 447.030, 447.040, 693.030 and 639.040 are accepted in person, mail, email or fax. All reports are entered into the WCBCS violations file and are investigated by the Building Official or his/her designee.

WHAT'S GOIN' ON?



- Restaurant had purchased a new high temperature dishwasher.
- Dishwasher installer removed the grease interceptor, and then installed a new one.
- It is the responsibility of the property owner to ensure the contractor has obtained a permit for the work.



Recall, the plumbing inspector does not have permission to enter the premise unless there is an active permit. However, City utility has right of entry as a condition of service. Plumbing inspector requested a City escort to conduct an inspection and discuss permit compliance with the FSE representative.

STAY WITHIN OUR JURISDICTIONS

Plumbing Code

- Installed correctly
- All non-domestic flow goes to the grease interceptor
- Temperature of dishwasher does not exceed 140° F

Pretreatment

- Once installation is approved by the Plumbing Inspector, the City requires maintenance
- Inspection to verify cleaning



Replied to Public Health District email with resolution: A grease interceptor is now installed and has been approved by the Plumbing Inspector.

CASE OF THE SEWER BACKUP

PRETREATMENT PROGRAM INITIATED ENFORCEMENT



A water spout, also called a sea tornado

HELP! THERE IS SEWAGE IN OUR RESTAURANT!

- **Restaurant called the City asking for help with a sewer back up**
 - Camera inspection showed grease layer had reduced the capacity of the sewer lateral
 - Deployed grease interceptor inspector. No surprise, full.
 - Manager said they get it cleaned on a regular once a year schedule (!!!)
- **Recall the Pretreatment Program jurisdiction:**
 - Once installation is approved by the Plumbing Inspector, the City requires maintenance.
 - Inspection to verify cleaning.



Due to relationship building, the City immediately notified the Public Health District when wastewater is present inside an FSE.

WE DIDN'T CAUSE IT!

- **City notified the Public Health District of sewer back up in FSE.**
 - Public Health Inspector decided to wait and then conduct a “routine inspection” a few days later since the backup was not in the kitchen.
 - Restaurant still in the process of working with plumber to resolve sewer back up. FSE manager denied that grease in lateral was a problem.
 - City provided picture of grease layer in sewer lateral to the Public Health Inspector and recommended quarterly cleaning schedule.
- **After the Health Inspector visit, FSE Owner called me to say that they knew the grease wasn't the cause of the sewer back up, but “out of an abundance of caution, they will now be cleaning their interceptor on a quarterly basis.”**
 - Actual cleaning schedule is every six months, but sufficient to prevent FOG interference in the plumbing and sanitary sewer main.



Food Sanitation Rules have three levels of enforcement

- Priority – imminent health threat
- Priority Foundation – health threat that must be promptly remedied
- Core – a health threat that must be remedied before the next inspection

BUT WAIT, THERE'S MORE!

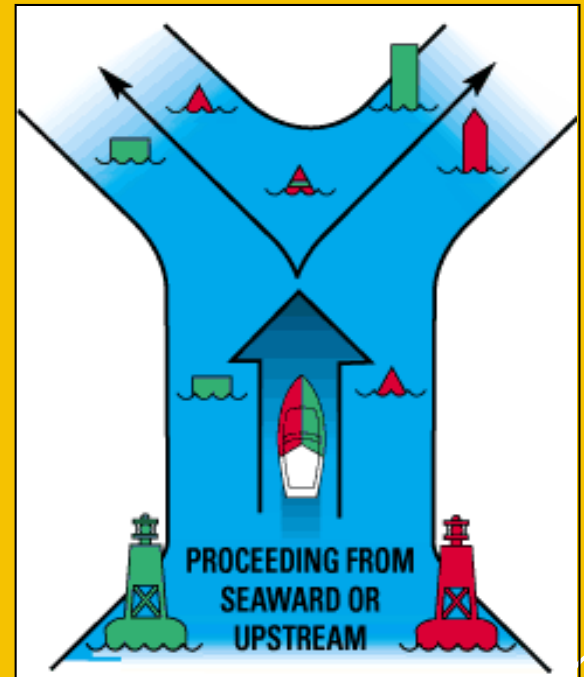
- **Camera inspection also revealed significant interference from dairy FOG originating from a drive-thru coffee establishment next to the restaurant.**
 - City inspected to learn whether a grease interceptor existed. No.
 - City initiated enforcement to require a grease interceptor to be installed.
- **Contractor knew to get a plumbing permit but didn't know how to get ahold of the plumbing inspector.**
 - The contractor has a dedicated crew that installs grease interceptors for this chain of drive-thru coffee establishments, so they know regulations.
 - Due to recent previous work with the Plumbing Inspector, City staff was able to give the contractor his cell phone number.
- **City notified the Public Health Inspector when the grease interceptor installation was complete (a grease interceptor now exists, 8 months after discovery of interference in the sanitary sewer main).**



Due to relationship building, the City was able to facilitate compliance with every jurisdiction.

CASE OF THE LEAKING GREASE INTERCEPTOR

PREFERRED PUMPER INITIATED ENFORCEMENT



PREFERRED PUMPER REPORT

- Received an emailed report from a service provider (preferred pumper)
 - Routine clean out of a well maintained interceptor.
 - Comment section: “A rusted hole at the bottom of the grease trap is causing a water leak. The manager was informed.”
 - City notified the Public Health District that the grease interceptor was leaking.
 - City called the Plumbing Inspector to confirm that a permit was needed.
- Recall the Pretreatment Program jurisdiction:
 - Once installation is approved by the Plumbing Inspector, the City requires maintenance.
 - Inspection to verify cleaning.

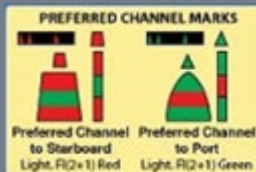


Due to relationship building, the City immediately notifies the Public Health District when wastewater is present inside an FSE.

Due to relationship building, required a copy of the plumbing permit in the City enforcement letter.

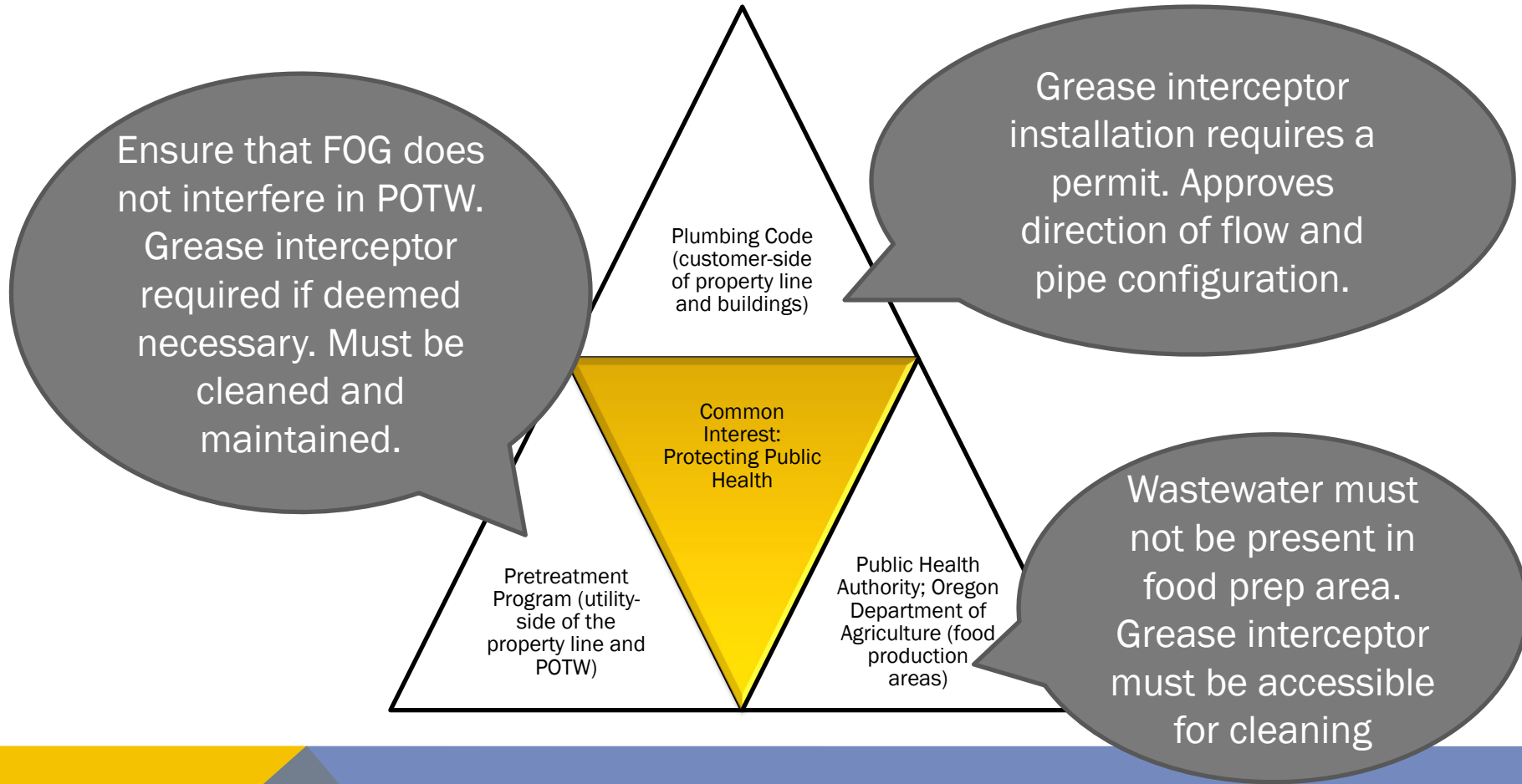
PRIORITY – IMMINENT HEALTH THREAT

- **City notified the Public Health District of sewer back up in FSE.**
 - Public Health Inspector decided to inspect within hours of notice due to known location of the grease interceptor.
 - Volume of wastewater leak was greater than the capacity of the floor drain.
 - Food handlers walking in a few inches of wastewater in the kitchen.
- **Public Health Inspector closed the restaurant until the grease interceptor was replaced and the plumbing inspector had passed the installation.**
 - City notified the plumbing inspector that a plumbing should be applying for a permit for emergency work at the FSE. Please prepare his schedule for an emergency inspection the following day.
 - City notified the Public Health Inspector that the plumbing inspector knew to schedule an emergency inspection.
 - City dispatched camera inspection due to greasy wastewater entering the floor drain for an unknown period of time.



Due to relationship building, the Public Health District and the plumbing inspector coordinated inspections to facilitate prompt reopening.

JURISDICTIONAL RELATIONSHIP WITH CUSTOMER

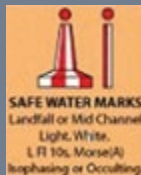
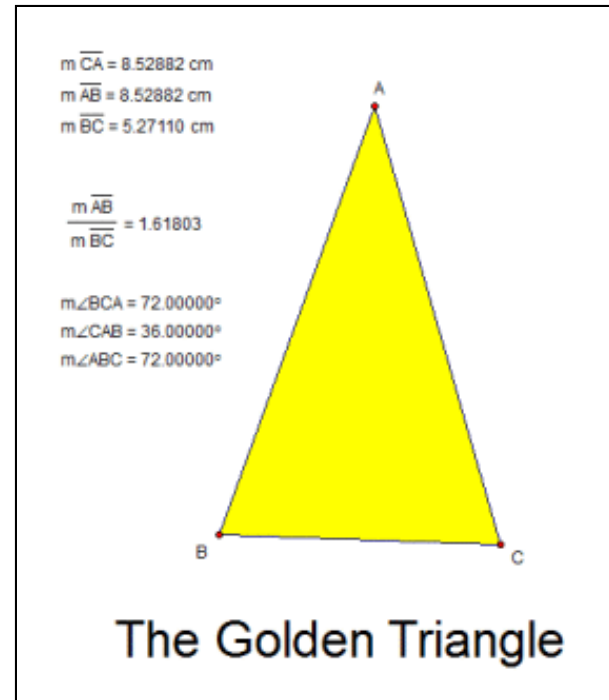


When the FSE representative asks questions, they do not know jurisdiction. It is each official's responsibility to only answer questions within their jurisdiction (even if they know the answer).



CAN WE CREATE A GOLDEN TRIANGLE? YES!

- The sublime triangle
- Proportions of the sides of the triangle are an equality of type
- Each side in a harmonious relationship with the other sides



A golden triangle of enforcement can be created when each authority supports the overlapping jurisdictions' ability to enforce.

Common Interest: Protecting public health



THANK YOU FOR YOUR TIME
ANY QUESTIONS?

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