

ENFIELD WATER POLLUTION CONTROL FOG (FATS, OILS, AND GREASE) PROGRAM NEWSLETTER

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Registration Program

The Town began a campaign of registrations/inspections of kitchen grease traps in August 2016. The FOG Registration Forms are now available on the town's website at; <http://www.enfield-ct.gov/1087/Fats-Oils-and-Grease>. **If you have not already done so, you should go to this webpage to register your grease treatment system.** Once you have registered online, the FOG Program inspector will visit to review your application, menu, kitchen and grease removal device, as well as maintenance records. **If you have an external tank the inspection will be done in conjunction with the next scheduled pumping of your tank. You must call the office to schedule this inspection for the next regularly scheduled pumping of your grease interceptor.**

The Enfield Sewer Regulations, as revised in 2013, requires all Food Service Establishment (FSE) to

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register. The regulation also requires an inspection fee of \$50, any re-inspection within 30 days of the inspection is included with this fee. The FOG inspector is available for consultation anytime without a fee.

The Town will make The CT DEEP aware of any cases where pre-treatment does not meet the state permit. The state permit, "General Permit for the Discharge of Wastewater Associated with Food Service Establishments" has been in place now for 11 years and full compliance has been required since July 2011. A link to this document is available at the Town's website listed above

DEEP Permit Changes/ Enfield Requirements

"The DEEP has recently reissued and modified its permit for the discharge of FOG. The primary changes were to accept internal grease traps without automatic grease removal and to insert language accepting 'super capacity' units. Several communities submitted comments during the public notice process and questioned the move from automatic removal. In the end the permit was reissued with the new provisions.

Enfield has reviewed the public record for justification for the changes and finds no reason for the move away from the automatic feature of a Grease Removal Unit (GRU). Standard passive units do not come with a strainer and many do not

provide flow control, two requirements that remain in the permit. In addition, the automatic version is made and sold by most major brands. No internal GRU, passive or automatic, has a large capacity for grease and/or solids storage.

Given these factors, the Town of Enfield has adopted the external trap or interceptor as our standard and we believe it is the best device for the job.

Internal traps and other units are alternatives which need justification if proposed. Automatic grease removal must be incorporated on these units. Please submit your proposals with this in mind.

Maintenance

As with any piece of equipment made to accumulate material and clarify water, your pre-treatment device requires maintenance and regular cleaning to remain functional and efficient.

Those entities who are using indoor GRU's must perform daily maintenance to ensure function, and completely clean out the unit on occasion, based on solids build-up. High solids build-up suggests the strainer in the unit is not being maintained and/or simple sink strainers are not being utilized. Maintaining strainers on your 3-bay sink reduces the amount of solids discharged to the grease trap and results in reduced maintenance of this unit.

Outdoor passive grease interceptors are, by contrast, low maintenance. They do not need to be



The lack of maintenance can lead to clogged sewer pipes.

maintained daily, but CT-DEEP does require pump-out of unit contents when solids and scum exceed 25% of the operating depth of the unit or **at least every 3 months**. Because of the 25% rule it is imperative that you monitor your haulers and have them **remove the contents completely, as required by the CT-DEEP**. Poor clean-out practices can lead to more frequent pump-outs. Good kitchen practices, like strainers on the sink drains, can reduce solids build-up and the frequency of pump-outs. **CT-DEEP and Enfield WPC require tee/baffles, and manholes to grade, on the inlet and outlet of each tank.**

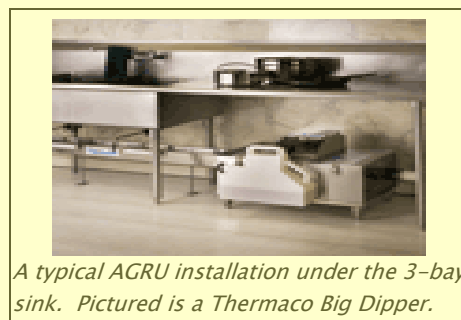
Inspections/Compliance/Recordkeeping

The CT-DEEP General Permit requires inspection and maintenance logs, with receipts, to be kept for 5 years, therefore, the Enfield program has the same requirement.

With your registration approval by the Enfield WPCA, you will be sent a compliance spreadsheet with the approval letter which includes a maintenance log. This is a convenient way to address the issue of maintaining records and reminding yourself of daily, weekly, monthly, or quarterly tasks. Please call the office if you need a copy of this log. 860-253-5248

“As with any piece of equipment, made to accumulate material and clarify water, your pre-treatment device requires maintenance”

The compliance inspections conducted this year have shown most entities have adequate maintenance. For recalcitrant FSE's we have developed a two pronged approach. Notices of Violation (NOV) will be issued to the FSE and, in some cases, landlords will be involved. In addition to the recent registration and pre-treatment requirements of the FOG program, the regulation has historically had pretreatment requirements of the owner/discharger. Where pretreatment compliance by the FSE is not provided, the owner of the connection can be cited for the lack of pre-treatment.



A typical AGRU installation under the 3-bay sink. Pictured is a Thermaco Big Dipper.

Best Management Practices

Best Management practices are the best way for an FSE to minimize operation and maintenance costs. As discussed above, kitchen sink strainers keep unwanted solid material from getting into your pre-treatment device which directly affects cleaning intervals. Adequate signage within the kitchen to indicate proper disposal of food solids and grease will minimize the generation of unwanted solids accumulation in the grease trap, maximize the removal of FOG, and protect internal plumbing against clogging. Best Management Practices are on the Connecticut DEEP website which can be accessed through Enfield WPC webpage at; <http://www.enfield-ct.gov/1087/Fats-Oils-and-Grease>

Next Phase of the Program in Development

The 2016 inspection/registration effort concluded with most entities showing good compliance. One problem area seems to be adequate record keeping, and, with few exceptions, we have simply instructed those without records to do a better job without issuing a notice of violation (NOV).

To support the registration and compliance campaign the WPCA is presently considering a schedule of fines for violations that will apply to ongoing maintenance and record keeping problems.

Presently there is an initial fee for inspection of \$50. For continued violations that are not resolved within 30 days, another inspection fee of \$50 must be assessed by regulation.

In May 2017 we will focus on getting FSEs and the equipment properly registered.

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Customer Name
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