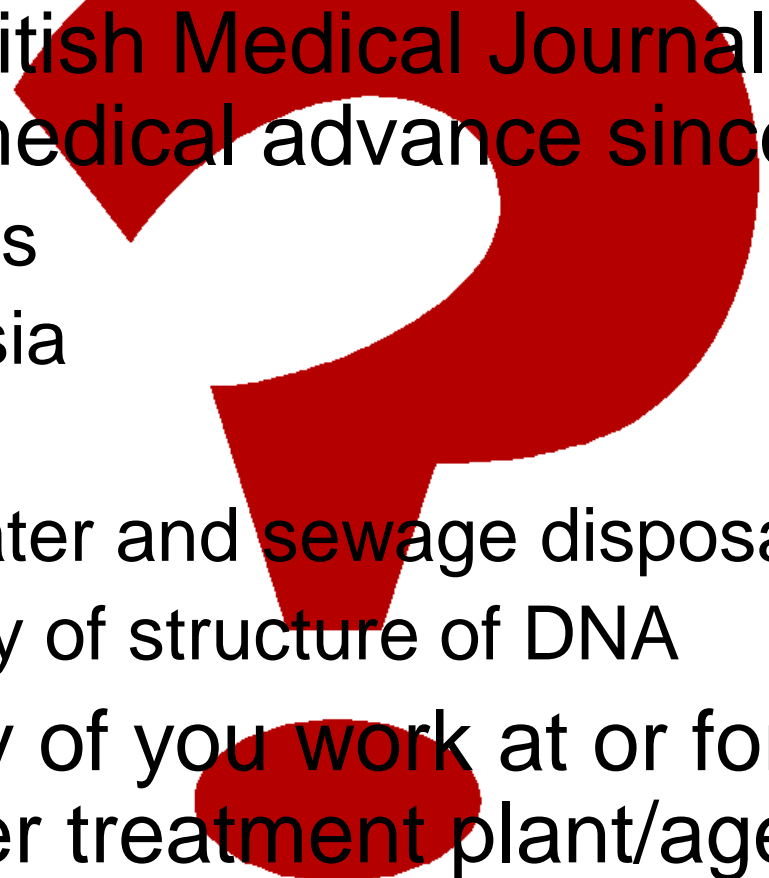


Pretreatment Programs: EPA Updates and FOG Control

Gayle Tupper
CWEA North Coast Section
March 18, 2010

W:\NAB\ESD\PRESENTATIONS\CWEA\PRETREATMENT-NCS 3-2010.PPT

- 
- Per the British Medical Journal, What is greatest medical advance since 1840?
 - Antibiotics
 - Anesthesia
 - Vaccines
 - Clean water and sewage disposal
 - Discovery of structure of DNA
 - How many of you work at or for a wastewater treatment plant/agency?





Overview

- EPA Updates
 - Significant Noncompliance
 - Electronic Reporting
 - Pretreatment Streamlining Regulations
 - Mercury
 - FOG
- FOG Program Development and Implementation
 - Goals
 - Regulatory Drivers
 - Key Program Elements

EPA Updates

Significant Noncompliance

- Focus on SIUs in SNC
- Compliance Schedules



Electronic Reporting

- Cross Media Electronic Reporting (CROMERR)
- Reporting from IUs to POTW
- Reporting from POTW to oversight agencies
- Electronic reporting may be available in 2010

EPA Updates

Pretreatment Streamlining

- No official deadline for implementation
- Looking for mandatory components
- Interested in additional implementation
 - eg., 45 day late reports, Multiple tier CIUs, other CIU modifications



EPA Updates

Mercury: Amalgam Separators

- Amalgam Separators
 - Not commonly required outside of SF Bay Area
- MOU among EPA, NACWA, ADA
- Pretreatment program audit topic



Mercury Information

- *Other mercury reduction activities*
 - *Schools program*
 - *Thermometer exchanges*
 - *EBMUD Program Specialist Deirdre Mena*
 - *510-287-1559 or*
 - *dmena@ebmud.com*

www.ebmud.com



EPA Updates

Fats, Oils, and Grease

- SSOs are focus
- New Staff
- Enforcement
- Prioritizing inspections



FOG Control Program:

Goals

- Reduce FOG related sanitary sewer overflows (SSOs) and blockages
- Efficient and cost-effective program



Regulatory Drivers

State Water Resources Control Board

- Statewide Waste Discharge Requirements for Sanitary Sewer Systems to control SSOs. The WDR/Sewer System Management Plan (SSMP) FOG component requires:
 - A public education/outreach program
 - A provision for proper FOG disposal
 - Legal authority to prohibit discharges
 - Authority to conduct inspections and to issue enforcement
 - Requirements to install and maintain GRDs
 - Identification of collection system pipes subject to FOG blockages and establishing a cleaning maintenance schedule
 - Development and implementation of source control measures

Regulatory Drivers

Citizen Lawsuits

- Citizen lawsuits (e.g., Baykeeper)
 - Increasing in number
 - Increased publicity

[PDF] [Northwest Environmental Advocates ~ San Francisco Baykeeper ...](#)

File Format: PDF/Adobe Acrobat - [Quick View](#)

Jul 23, 2008 ... Sejal Choksi (San Francisco Baykeeper) 925/330-7757. NINTH CIRCUIT UPHOLDS CASE ... EPA denied the petition in 2003, triggering the lawsuit. ...

www.baykeeper.org/assets/downloads/PR7.23.08.pdf

[+ Show more results from www.baykeeper.org](#)

[San Carlos Sued by San Francisco Baykeeper - Press Release](#)

Dec 2, 2009 ... San Carlos, CA – December 2, 2009 – The City of San Carlos announced today that it has been sued by the San Francisco Baykeeper group along ...

www.cityofsan-carlos.org/civica/press/display.asp?Entry=514 - [Cached](#)

[Aging pipes force sewage into San Francisco Bay - SFGate](#)

Jan 31, 2010 ... san francisco baykeeper. A man fishes along the shore in front of ... A case in point: Last year, the EPA filed a federal lawsuit with the ...

articles.sfgate.com/.../17841606_1_bay-area-raw-sewage-overflows - [Cached](#)

[Almanac : West Bay Sanitary sued over sewage spills](#)

Dec 11, 2009 ... San Francisco Baykeeper, in a lawsuit filed Dec. 2 in U.S. District Court, contends that thousands of gallons of sewage overflows reached ...

www.almanacnews.com/news/show_story.php?id=5540 - [Cached](#)

[California Coastkeeper Alliance | Newsroom | San Francisco ...](#)

San Francisco Baykeeper Wins Sewage Spill Prevention Settlements. Environment News Service 07/23/2009. SAN FRANCISCO, California, July 23, ...

www.cacoastkeeper.org/.../san-francisco-baykeeper-wins-sewage-spill-prevention-settlements - [Cached](#) - [Similar](#)

["San Francisco Baykeeper Wins Sewage Spill Prevention Settlements ...](#)

"San Francisco Baykeeper Wins Sewage Spill Prevention Settlements". Print | Forward |

"SAN FRANCISCO -- Sewage spills that have contributed to water ...

www.sej.org > [Headlines](#) - [Cached](#)

FOG Control Program:

Key Program Elements

- Permits/Ordinance
- Inspections
- Requirements
- FOG Haulers
- Outreach
- Residential FOG
- Enforcement

Hotspot Response

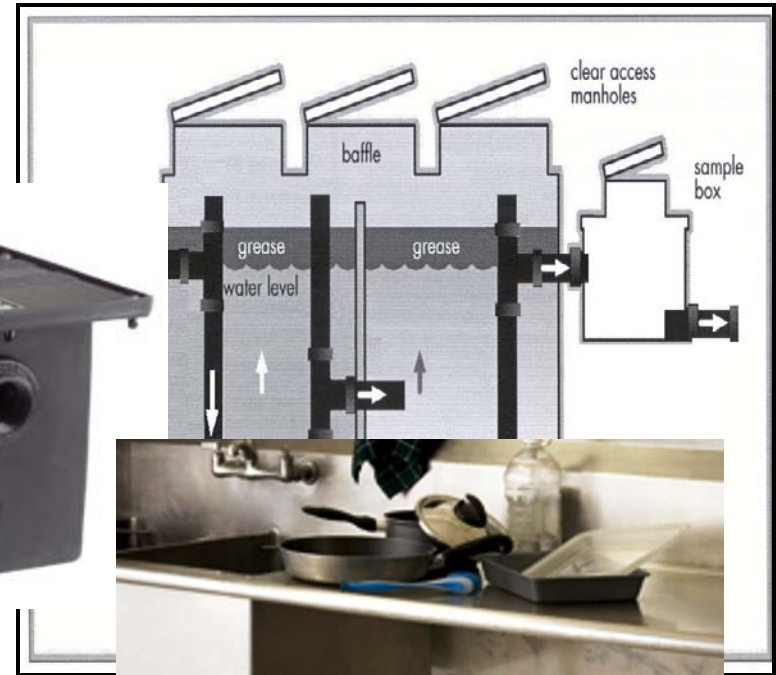
Key Program Components

Ordinance or Permits

- Ordinance
- Single document
- Legal Authority
- General Requirements
- Revision by Board or Council
- Permits
- Many permits
- Specific requirements or blanket permit
- Higher maintenance
- Easier to revise
- Provides for more info
 - Outreach
 - Hauling requirements
 - BMPs

FOG Control Program: Requirements

- Grease Interceptors
- Grease Traps
- Automatic Grease
- Grease Control



FOG Control Program: Requirements

- Criteria for requiring grease control device
 - All FSE
 - FSE that meet specified conditions
 - New or remodeled
 - Change of owner
 - Cause or contribute to blockage/SSO
 - Other
- Criteria for pumping
 - Time basis (e.g. 3 months)
 - Volume basis (e.g. >25%)
- Reporting

Key Program Elements

Inspections

- Restaurant facility inspections
 - Verify requirements
 - BMP review
 - Inter-department / interagency referrals
- Grease interceptor inspections
 - Pumping records
 - Maintenance requirements



Key Program Elements

Inspections

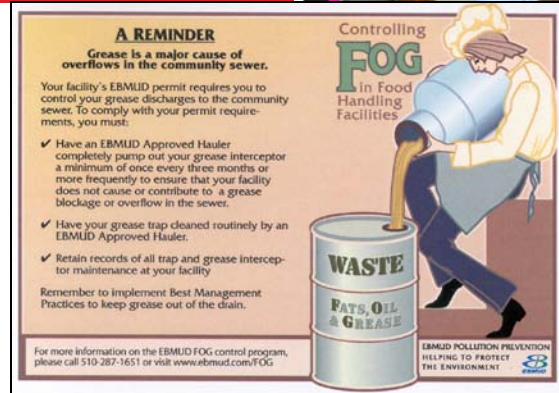
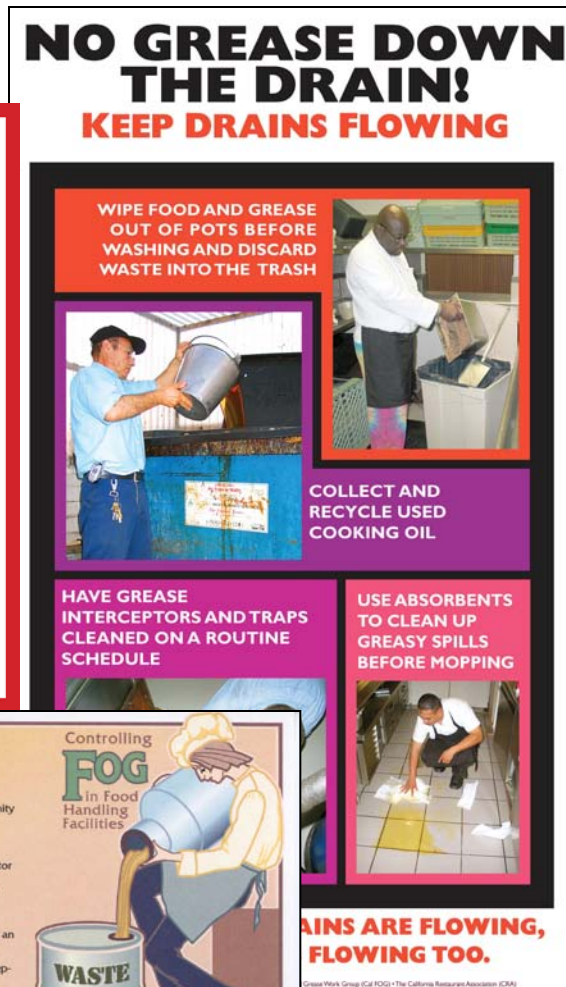
- Lateral camera investigations
 - Clearly associates grease with specific facility
 - Prefer this if accessible
- Main line camera investigations
 - Equipment requirements
 - Potentially difficult to associate grease with specific facility



Key Program Elements

Commercial Outreach

- FOG program brochure (FAQs)
- Best Management Practices
- Approved haulers list
- Grease interceptor maintenance flyer
- Annual reminder postcard



Key Program Elements

Grease Haulers

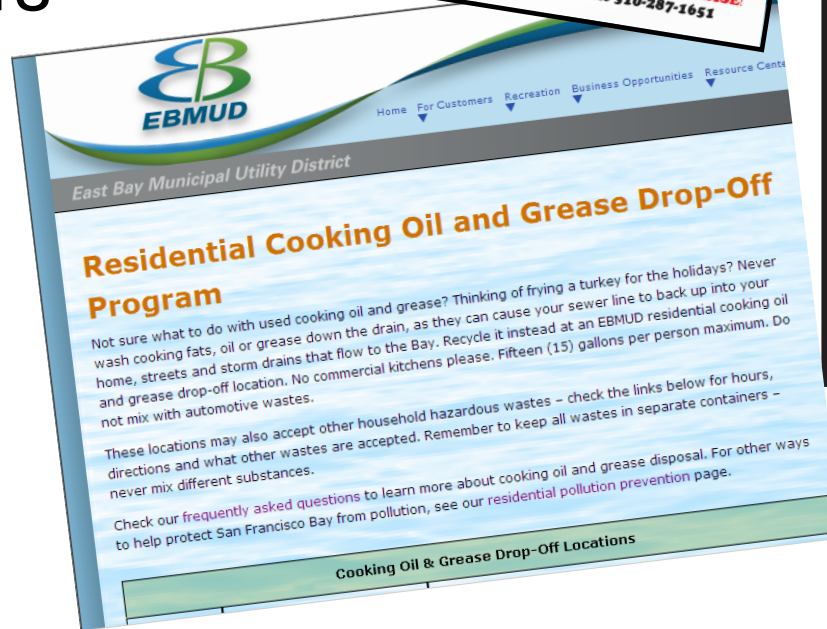
- Full pump outs
- Receipts
- Hauler training
- Tracking FOG



Key Program Elements

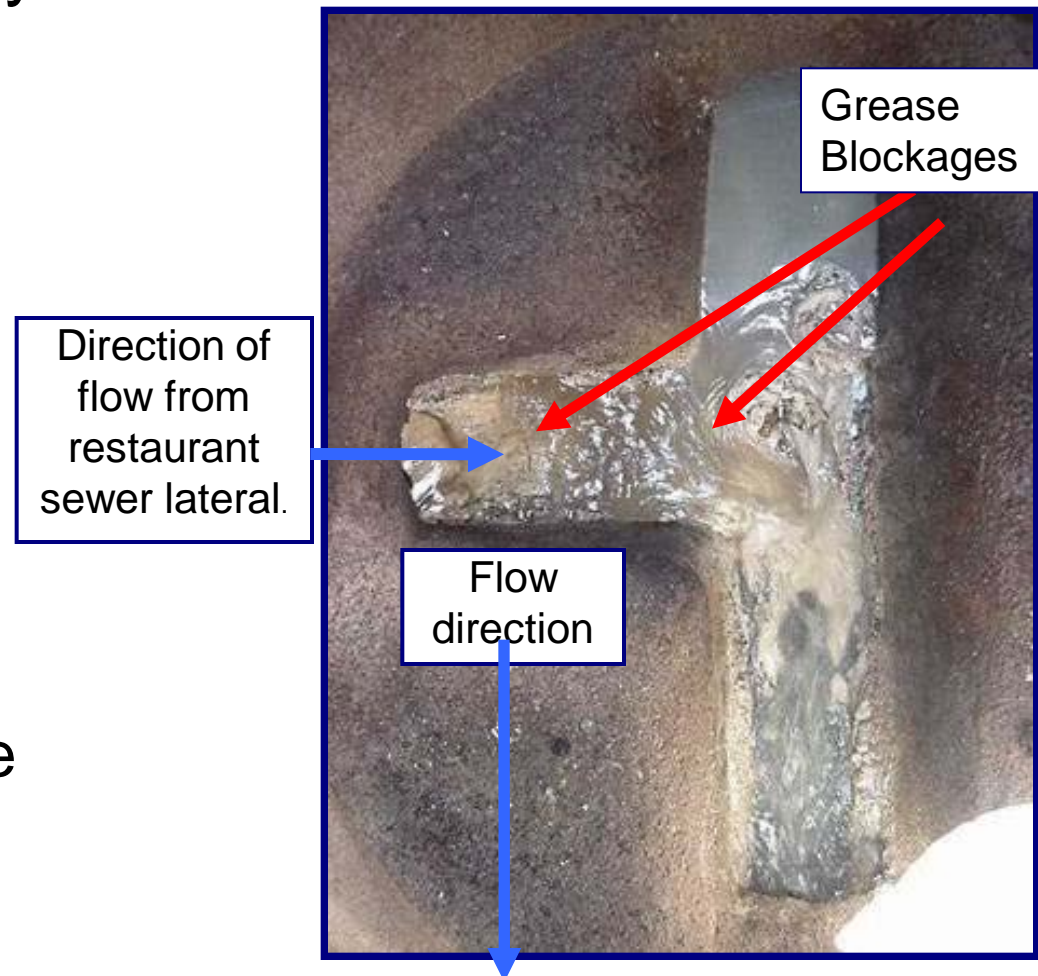
Residential FOG

- >80% of hotspot reports in some areas
- Website
- Water Bill mailers
- Interagency flyers
- FOG Drop-off sites
- Outreach partners



Hotspot Response

- Hotspot Notification by collection system
- Investigation and response to hotspot notifications
 - Map the upstream drainage basin
 - Residential and commercial
 - Inventory food service establishments




Hotspot Response


- Field Investigations
 - Targeted restaurant inspections
 - Sewer line camera Investigations
- Follow-up
 - Requirements
 - Outreach
 - Enforcement



Hotspot Response


Wednesday, March 17, 2010 NEWS FEED COMMENTS



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Key Program Elements

Resources

- Potential Funding Sources
 - Pollution Prevention Program Fees
 - Permit Fees
 - Inspection Fees
 - Follow-up Fees
- Information Exchanges
 - CalFOG Website
 - CWEA P3S
 - Pretreatment Coordinators