

working for clean rivers



## WSA - FOG Forum

### Challenges Setting Up A FOG PROGRAM



ENVIRONMENTAL SERVICES  
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# Presentation Summary

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- Challenges faced and tools to use when starting a FOG program.
- Portland's FOG program from 2005 to Present.
- Current types of FOG programs:
  - “All In”
  - “Making It Work”
  - “Spinning Its Wheels”



# Challenges

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- FOG issues that can be used to make a case:
  - O&M of public sewers
  - Lack of FOG enforcement code language
  - Sanitary Sewer Overflows
    - Capacity Management Operation & Maintenance (cMOM)/NPDES permit requirements
  - Lack of O&M standards for GRDs



# O&M of Public Sewers

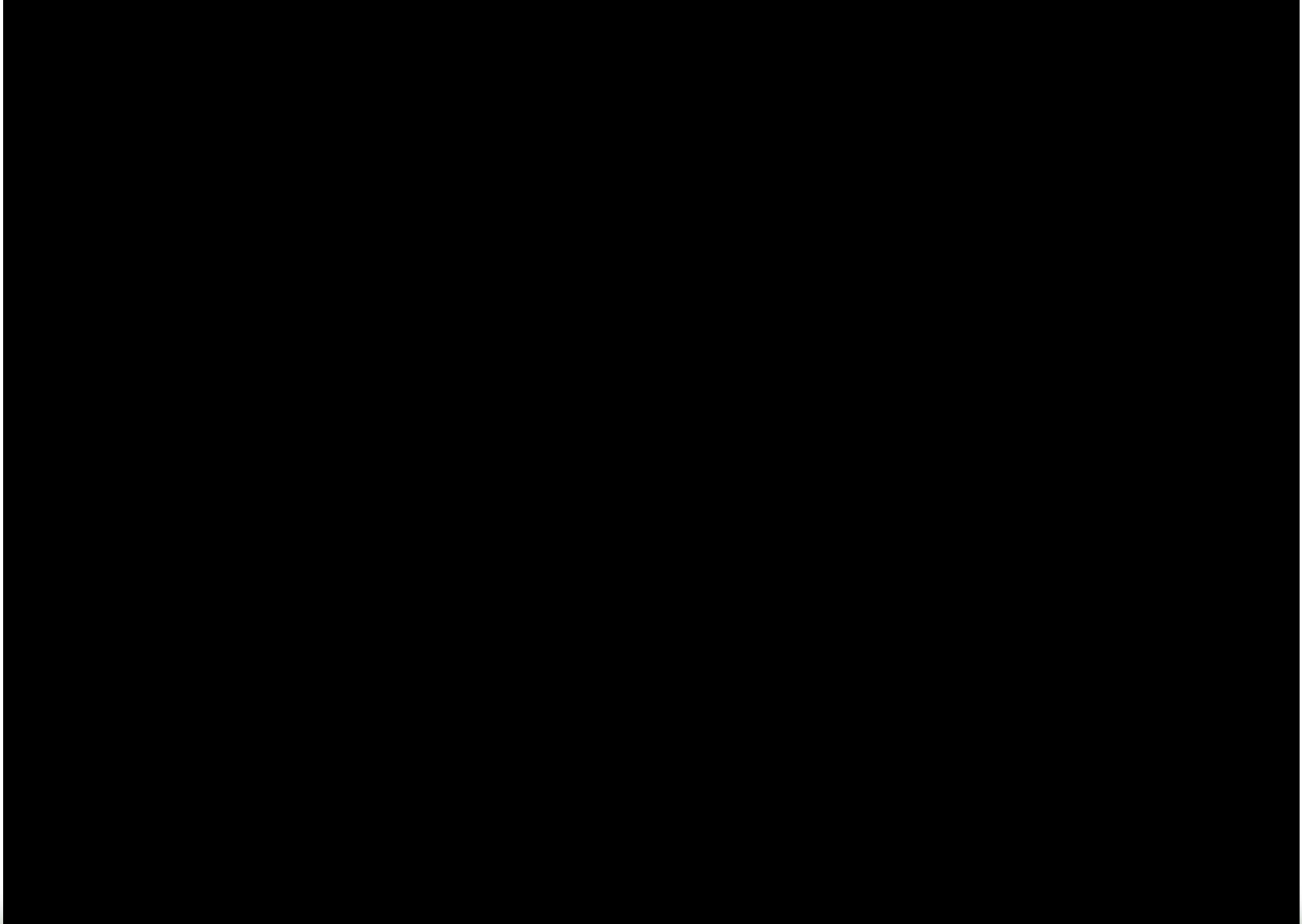
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- What's the typical sewer cleaning frequency in your jurisdiction?
- How much does it cost to clean your FOG Hot Spots annually?
- Photos/videos of FOG impacting your sewer.
- FOG impact on WWT
- Sources of FOG impacting collection system.
- What's been done to address FOG sources? Has it worked?



# The video that sold the need.

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# Lack of FOG enforcement code language

- Pretreatment code doesn't adequately allow the ability to address non-industrial FOG dischargers.
- Food Service Establishments (FSEs) continually cause FOG O&M issues in your collection system.
  - FSEs that cause SSOs may be fined (cost recovery) but you're unable to address the real issue of their FOG discharge.
- How to require repair/replacement of a GRD?
  - Photos of GRD deficiencies found during inspections.



# Sanitary Sewer Overflows

- State and Federal governments are watching.
  - Fines are being levied against municipalities with recurring SSOs.
  - They're expecting jurisdictions to have proactive programs in place to reduce/eliminate FOG related SSOs.
    - Are you addressing the root cause of FOG or just covering it with increased line cleaning?
  - FOG programs are now being incorporated into cMOM and NPDES permits.



# Lack of O&M standards for GRDs

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- If the 'Authority Having Jurisdiction' isn't inspecting GRDs after installation to ensure proper O&M, who is?
- FSEs set cleaning frequencies that are most beneficial to their bottom line, instead of most beneficial to City's collection system.
- Unable to require FSEs to make repairs or increase cleaning frequencies of GRDs.
- No cleaning standard FSEs must adhere to when having GRDs serviced.





# Portland 2005 - 2011

- Accelerated Grease Cleaning Areas (AGCA)
  - City sewers cleaned every 10-12 years. AGCAs range from quarterly to every two years. Apprx. 12 miles of AGCA sewer.
  - Apprx. \$150K year spent on AGCA line cleaning.

- No decrease in AGCA cleaning after years of FSE BMP training.

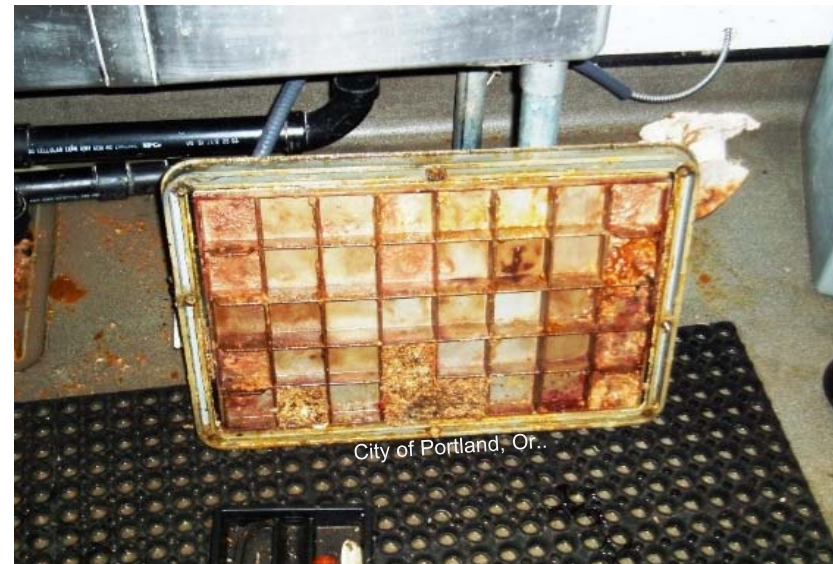


- Enforcement limited: 1) lack sewer use ordinance code 2) interpretation of OPSC



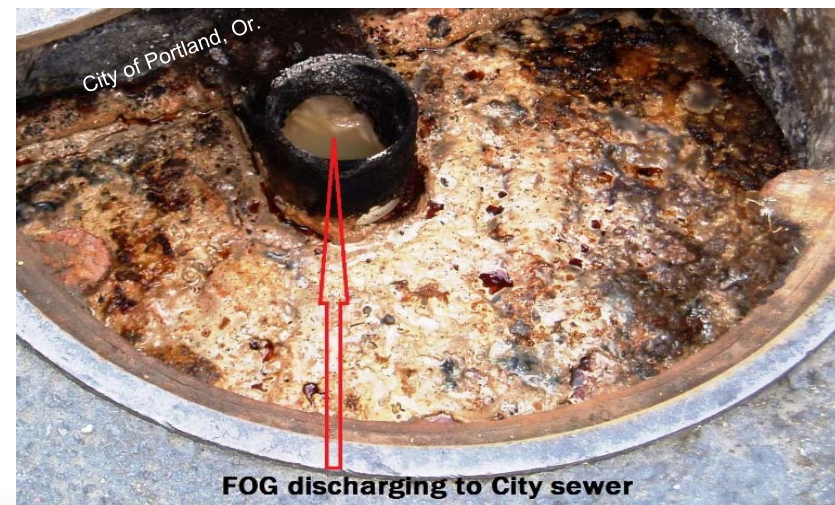
# Portland 2005 - 2011

- Once a Grease Removal Device (GRD) was installed no program in place to ensure the device was being serviced properly and was in good working condition.



# Portland 2005 - 2011

- 2009 began the City's Case Study period.
- Working with the PPP, the City was able to conduct GRD inspections:
  - 2/3 needed frequency increases.
  - 1/3 in need of significant repair/replacement.



# Portland 2005 - 2011

- Case Study findings:



# Portland 2005 - 2011

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- June 2011
  - BES proposed new Administrative Rule set to City Council. Citing the following findings:
    - Historical AGCAs issues
    - GRD Case Study
    - Need for more prescriptive GRD O&M language



# January 1, 2012

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- FOG Administrative Rules adopted.
  - Require new construction and redevelopment to plumb all fixtures to a GRD (language mirrors OPSC).
  - Establish cleaning standards for HGI & GGI (mirrors PPP)
  - Requires FSEs to submit cleaning reports.
  - City dictates minimum cleaning frequency.
  - Installation guidelines
- Enforcement issued for:
  - Inadequate cleaning frequency
  - GRD in disrepair
  - Failure to submit cleaning reports
  - Use of additives
  - Visible FOG discharge impacting City sewer
  - Causing a sewer blockage
  - Enforcements can be WN or NOVs (with civil penalty)



# Portland FOG by the numbers

Year	Pump outs	Staff Inspections	Gallons of FOG Removed
2011	6175	665	832,000
2012	8570	651	1,000,500
2013	11,330	558	1,280,300
2014	13,000	988	1,328,000
2015	14,450	845	1,600,000

- Fall 2011 – 2 FT inspectors hired
- Currently 3500 FSEs
  - 1900 with GRD
  - 2200 GRDS
  - Frequencies range from every 3 days to annual



# The “All In” program

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- Full support from management/council.
- FOG specific code with enforcement capabilities.
- Proactive approach to FOG.
- Requirements for GRD O&M.
- Address SSOs caused by FOG.
- Address ‘Hot Spot’ areas.





# The “Making It Work” Program

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- General support from management.
- Piggyback existing Pretreatment Code.
- Can prescribe basic O&M guidelines.
- Usually has good relationship with local plumbing officials.
- Enforcement usually geared towards cost-recovery of collection system cleaning.



# The “Spinning Its Wheels” Program

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- Minimal support from management.
- Sewer maintenance and environmental programs aware of FOG issues.
- Reactive approach to FOG issues.
- Technical Assistance the extent of dealing with FOG.
- Enforcement not an option.
- Relationship with Plumbing Officials poor to average.



# QUESTIONS

