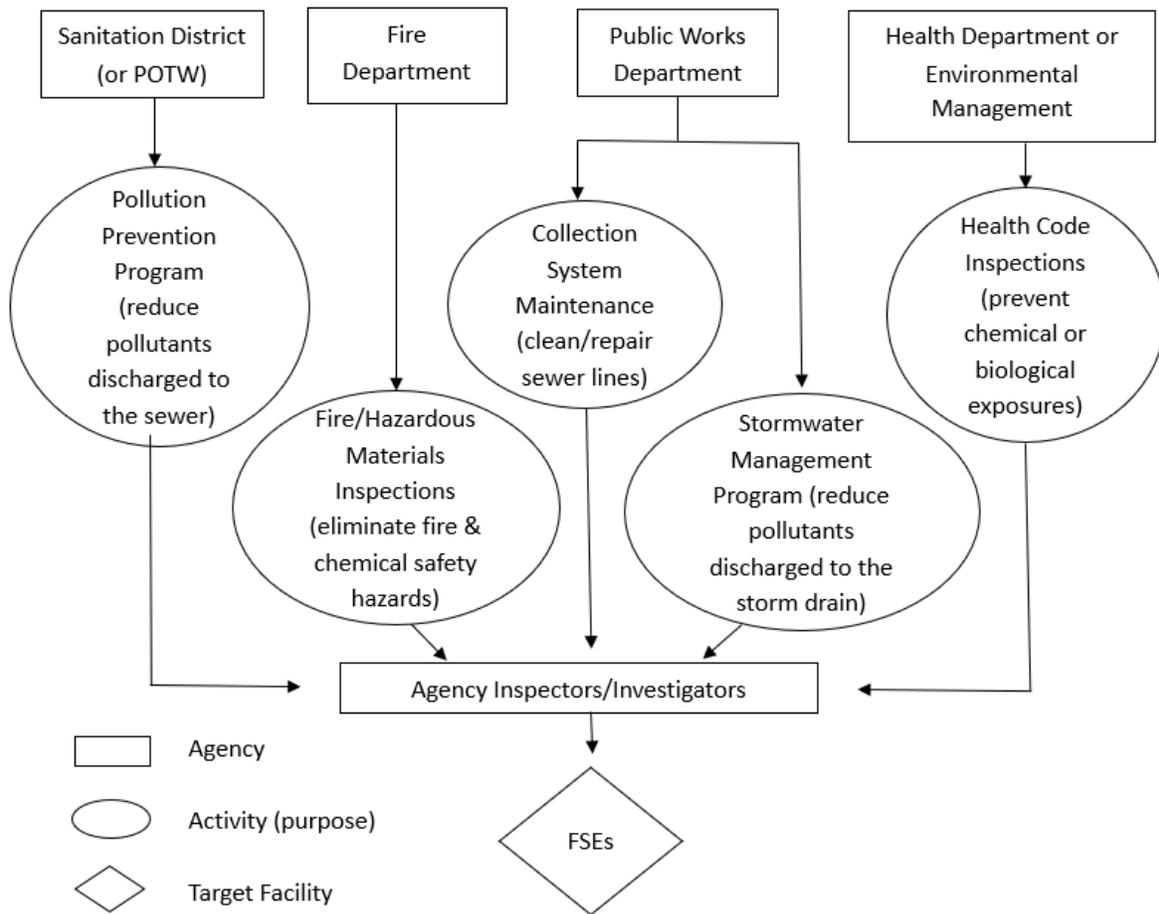


ESTABLISHING PROGRAM ADMINISTRATION

Administration of a FOG Control Program may be established through a Source Control or Pollution Prevention Program, a Collection System Maintenance Program, or a Health Department Inspection Program. No matter which agency is used to administer the FOG program, there must be communication between departments and sharing of detailed information. Guidelines are presented in the following paragraphs regarding identifying and facilitating inter-departmental interactions. This section also includes a review of the types of funding sources available for a FOG Control Program.

Identify Municipal Agency Structure

Getting to know how the applicable municipal agencies are organized is essential to determining how the FOG Control Program will operate most effectively. Municipal agency operations should be identified and reviewed prior to establishing a line of communication with the appropriate agency officials. As part of that communication, the importance of the FSE control program should be emphasized. For example, damage claims and/or enforcement penalties may be avoided if proper control measures are implemented and enforced.



It may be useful to create a flowchart or an organization chart showing the municipal departments and the officials that interact with the FSEs (e.g., fire, health, stormwater, etc.). A sample flowchart has been included to show the appropriate level of detail. Each member of the FOG program staff should be familiar with the levels of authority that interface with the FOG Control Program and understand each agency's particular responsibilities. To reduce confusion among the FSE operators; it is best to have one municipal agency launch the FOG Control Program, oversee implementation of the program, evaluate its effectiveness, and coordinate improvements to the program over time.

There are many advantages to working effectively with the different municipal agencies. Plumbing, building and health departments are a source of records to determine operations inside an FSE. Street and traffic personnel can supply information on problem sewer lines when provided with maps of the collection system. Establishing and maintaining good communication with all of the appropriate municipal departments will result in quick reports on sewer problems and provide interim monitoring between facility inspections. Tracking the FOG Control Program efforts and reporting the data to all interested agencies facilitates information sharing and minimizes repetitive contacts with the FSEs.

Identify Funding Sources

Funding Mechanism	Use of Funds	Source of Income	Sample Municipality
Cost Recovery	SSO cleanup expenses	Dischargers assessed cost for removing FOG blockage	City/County of San Francisco, City of Tacoma, WA, Clean Water Services
Permit Fees	FSE Permit Program Administration	FSEs pay an annual permit fee to obtain a discharge permit	City of Springfield, MO, Miami-Dade County, FL, City of Flagstaff, AZ
Sewer Use Fees	FOG Control Program Administration	Sewer use fees paid by all dischargers are distributed to specific programs through a general fund	Napa County Sanitation District, Clean Water Services, Clackamas County WES, City of Portland, OR
Enforcement Actions (fines and penalties)	FOG Control Program Administration	Fines levied against dischargers are used for program implementation	
Grants	FOG Control Program Administration	Proposition 40, administered by the State Water Resources Control Board and the U.S. EPA	City of Cupertino, CA
Pollution Prevention Fee	Administration of Pollution Prevention Program	Monthly fee paid by all commercial dischargers, with a portion allocated to the FOG Control Program	East Bay Municipal Utility District, CA
Contributing Member Agencies	Program Development	Contribution proportional to number of FSEs in the agency's wastewater service area	East Bay Municipal Utility District, CA

Revenue collection, grants, and other funding methods have been used to support FOG Control Programs.

Stakeholder Engagement

If the provisions of the ordinance are perceived as too rigid or too difficult to implement, the ordinance may not be implemented successfully. To minimize this problem, the stakeholders should be involved in ordinance development. Stakeholders may include FSE operators, health department inspectors, city council members, stormwater inspectors, building inspectors, business license division personnel, and collection system/treatment plant operators. The stakeholders may be contacted individually or convened as a group for a “working session” to settle on the details. To minimize the number of attendees, the state Restaurant Association or some other local FSE association, could provide representation and feedback. The sequence outlined below is recommended during the development of a local sewer use ordinance or permit.

Sequence	Action
1	Determine whether the existing sewer use ordinance contains provisions for FOG control.
2	Review ordinances and permits from other municipalities.
3	If necessary, create a draft ordinance or amendment and internally identify the negotiable and non-negotiable provisions.
4	Ask for input from the other municipal agencies that may be affected (e.g., health department, stormwater program).
5	Ask for input from the local restaurant association (e.g., ORLA) or other business associations.
6	Obtain a legal review.
7	Conduct a town hall meeting or workshop and invite applicable stakeholders.
8	Issue a public draft for comment (not mandatory for a permit).
9	Adopt the final ordinance or permit.