

FATS, OILS, and GREASE
(FOG) CONTROL
PROGRAM

FOR



***Winchester Municipal
Utilities***

Winchester, Kentucky

August 19, 2009



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1.0 EXECUTIVE SUMMARY

In accordance with requirements of the Consent Decree, the City of Winchester (Winchester) and Winchester Municipal Utilities (WMU) will implement a two-phased Fats, Oils, and Grease (FOG) Control Program. The goals of the FOG Control Program are to:

- Reduce the potential for sanitary sewer overflows due to the presence of FOG in the sanitary sewer system;
- Reduce the amount of FOG discharged to the Publicly Owned Treatment Works (POTW);
- Reduce operation and maintenance expense due to the presence of FOG; and
- Transfer to the extent possible the costs of managing FOG discharged to the POTW to those that are the primary contributors.

The FOG Control Program proposes that Winchester establish the legal authority to permit and control the discharge of FOG to the POTW. The program will develop specifications and design standards for FOG dischargers and discharges to the POTW and will require compliance through a program of permitting and inspection that may or may not mandate construction of FOG control devices. Food service establishments (FSEs) will be the targeted users regulated by the FOG Control Program.

Phase 1 of the FOG Control Program contains several requirements:

- A new division to the Winchester Code of Ordinances, Division 12, will be added to define to include the FOG Control Program and authorize WMU to audit Food Service Establishments, for FOG sources and control, issue permits, to significant FOG discharges, establish permit criteria, and enforce permit limits.
- WMU will complete a list of FSEs based upon records of the Clark County Health Department and WMU's water service records.
- WMU will perform closed circuit television (CCTV) inspection from the discharge side of all FSE laterals and will perform similar inspections on sanitary sewers downstream of the FSE discharge. These inspections will aid in the identification of significant dischargers of FOG to the POTW.
- WMU will assist all FSEs with the completion of a FOG Control Permit Application.



- After the CCTV inspections have been completed and the FOG Control Permit Applications have been completed and received, WMU will evaluate the data and assign a risk ranking to each FSE. The ranking will be used to establish discharge permit conditions, frequency of inspections, required monitoring, and reporting by the FSE, and permit fees. A FSE with a lowest risk ranking will be exempt from the permitting process.

Phase 1 of the FOG Control Program will be completed by January 1, 2010.

In Phase 2 of the FOG Control Program, WMU will issue FOG Control Permits, conduct on-site compliance inspections, and monitor discharges and discharge reports. Permits will be issued for three-year periods and renewed based upon compliance and payment of fees. Phase 2 of the FOG Control Program will be fully implemented by April 2010.



2.0 PROGRAM ELEMENTS

This document provides WMU with a written FOG Control Program that meets the requirements of WMU's April 2008 consent decree. The Program includes:

- Legal authority to control the discharge of grease into the Sanitary Sewer System, including an assessment of the feasibility of instituting a permit program;
- Specification of accepted devices to control the discharge of grease into the Sanitary Sewer System;
- Establishment of standards for design and construction of grease control devices, including standards for capacity and accessibility, site map, design documents, and as-built drawings;
- Establishment of grease control device management, operation and maintenance standards, or best management practices, that address on-site record keeping requirements, cleaning frequency, cleaning standards, use of additives, and ultimate disposal;
- Establishment of construction inspection protocols, including scheduling, inspection report forms, and inspection record keeping requirements, to assure that grease control devices are constructed in accordance with established design and construction standards;
- Establishment of compliance inspection protocols, including scheduling, inspection report forms, and inspection record keeping requirements to assure that grease control devices are managed, operated and maintained in accordance with the established management, operation and maintenance standards or best management practices;
- Establishment of an enforcement program to ensure compliance with the grease control program;
- Establishment of a compliance assistance program and education program to facilitate training of grease generators and their employees;
- Establishment of a public education program directed at reducing the amount of grease entering the Sanitary Sewer System for private residences;
- Establishment of staffing and equipment requirements to ensure effective implementation of the program; and,
- Establishment of performance indicators to be used by WMU to measure the effectiveness of the FOG Control Program.



3.0 DEFINITIONS

This document contains many terms and abbreviations. A glossary of key terms, including associated abbreviations, is presented here to facilitate understanding.

- Best Management Practices (BMPs) – practices intended to reduce the quantity of FOG discharged to grease interceptors and the sewer during food handling operations.
- Black water – wastewater from sanitary fixtures such as toilets and urinals.
- Collection System – The network of gravity sewer pipes, manholes, and associated appurtenances that conveys wastewater to a pump station or to the wastewater treatment plant.
- Common grease interceptor – a device to which grease wastes are directed from a group of facilities having different operators or types of operations, such as in a food court.
- Environmental Protection Agency (EPA) – United States Environmental Protection Agency, Region 4. Federal regulatory agency with the mission of protecting the environment.
- Food courts – areas predominantly found in shopping centers, amusement parks, and festivals, where several food preparation establishments having different owners may be sharing seating space and/or plumbing facilities.
- Food Service Establishment (FSE) – facilities that discharge sanitary waste and that prepare and/or package food or beverages for sale or consumption, on or off-site, with the exception of private residences. FSEs include those establishments primarily engaged in activities of preparing, serving, or otherwise making food available for consumption by the public, such as food packagers, grocery stores, bakeries, restaurants, commercial kitchens, caterers, hotels, schools, hospitals, prisons, correctional facilities, and care institutions. Examples of food preparation activities utilized by FSE's include the following: cooking by frying (all methods), baking (all methods), grilling, sautéing, rotisserie cooking, broiling (all methods), boiling, blanching, roasting, toasting, or poaching.
- Garbage grinder (disposal) – a device which shreds or grinds up solid or semisolid waste materials into smaller portions for discharge into the sanitary sewer collection system.



- Grease – a material composed primarily of fats, oil, and grease from animal or vegetable sources. The term fats, oil, and grease (FOG) shall be deemed as grease by definition. Grease does not include petroleum-based products.
- Grease interceptor – a device designed and installed so as to separate and retain deleterious, hazardous, or undesirable matter from normal wastes for controlled disposal while permitting normal sewage or liquid wastes to discharge into the drainage system by gravity. Grease traps are herein referred to as “grease interceptors.”
- Hauler – one who transfers waste from the site of a customer to an approved site for disposal or treatment.
- Infiltration – The introduction of groundwater into the sewer system by such means as defective pipes, pipe joints, connections between pipes, or manhole covers.
- Inflow – The introduction of surface water runoff to the sewer system from sources such as: roof leaders; drains in basements, driveways, and yards; manhole covers; and cross connections from storm sewers.
- New Construction – means construction of a new structure that will include an FSE, or modification of an existing structure or portion of an existing structure to accommodate an FSE, or change in type of FSE that will significantly increase the potential for FOG production.
- Notice of Violation (NOV) - formal written notices to persons found to be violating any provision of the WMU Code of Ordinance.
- Risk Ranking – a ranking used to determine: whether a FOG Control Permit is needed; permit conditions; frequency of inspections; and permit fee.
- Service Call History – written documentation of a WMU customer reported problem.
- Sewage – the liquid and water-carried domestic or industrial wastewaters from dwellings, commercial establishments, industrial facilities, and institutions, whether treated or untreated. The term wastewater shall be deemed as sewage by definition.



- Sanitary Sewer Overflow (SSO) – Any discharge to waters of the United States from the Sewer System owned and operated by the City and WMU through point sources not specified in any KPDES permit (otherwise known as “Unpermitted Discharges”), as well as any release of wastewater from the Sewer System to public or private property that does not reach waters of the United States, such as a release to a land surface or structure that does not reach waters of the United States; provided, however, that releases or wastewater backups into buildings that are caused by blockages, flow conditions, or malfunctions in a building lateral, or other piping or conveyance system that is not owned or operationally controlled by the City and WMU, are not SSOs for the purposes of WMU’s Consent Decree.

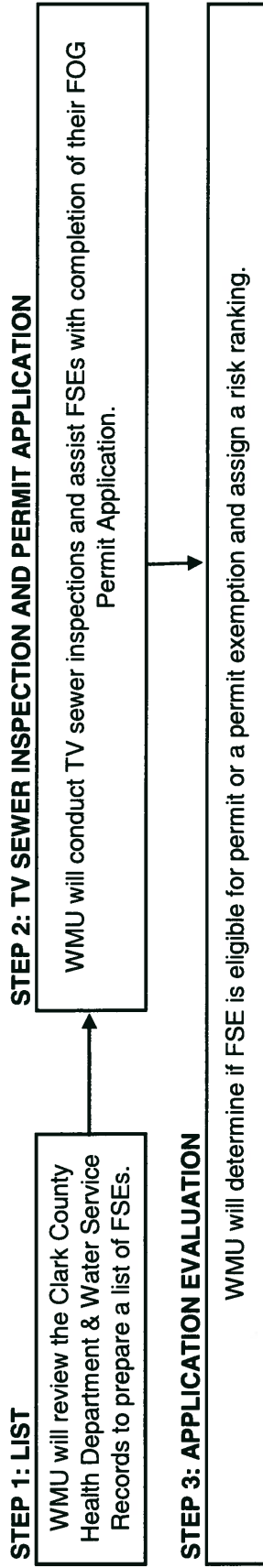


4.0 FOG CONTROL PROGRAM OVERVIEW

The FOG Control Program is customized to meet the needs of WMU and the Consent Decree. The Program acknowledges that existing Food Service Establishments (FSEs) have infrastructure restrictions and limited resources to meet the goals of the program. A transition period for all FSEs will be incorporated into the Program that considers both existing FSEs and new FSEs. An overview of the proposed FOG Control Program is presented in Figure 1, followed by a description of each of the program's steps.

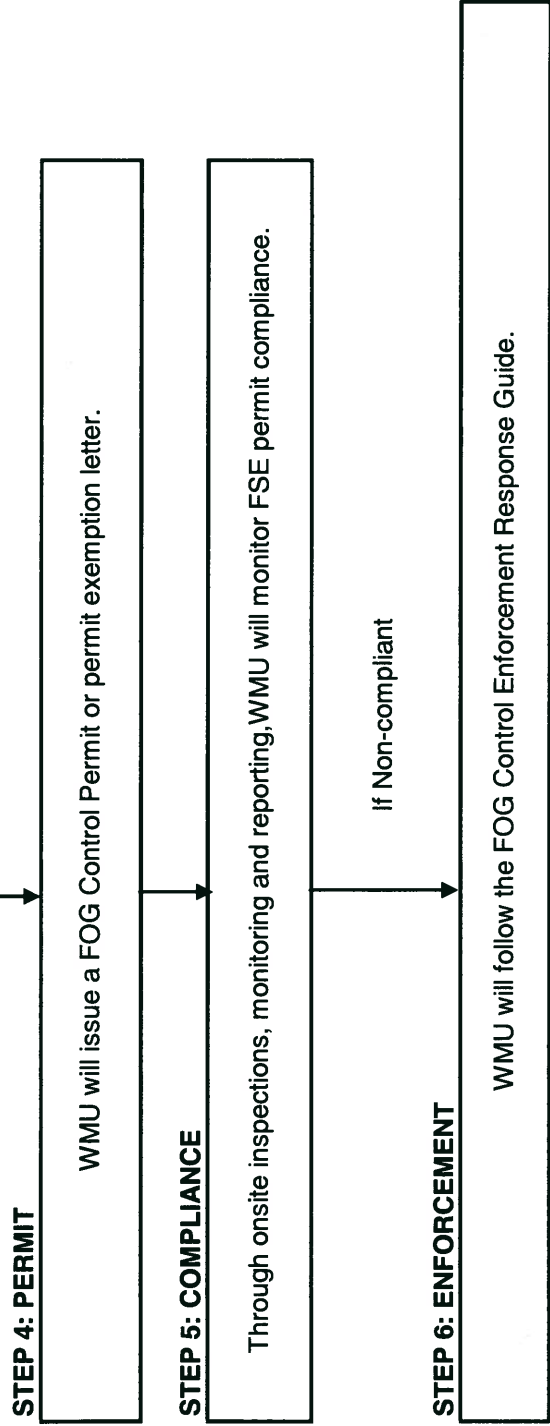
FIGURE 1 – OVERVIEW OF FOG CONTROL PROGRAM

Phase 1



- Develop specifications and design standards for FOG Control devices
- Develop protocols for permitting, monitoring, inspections, reporting

Phase 2





Phase 1:

Step 1. List

The FOG Control Program will use Clark County Health Department's (CCHD) list of permitted FSEs and WMU's water service to compile a comprehensive list of FSEs in the service area. This list is presented in Appendix A. WMU will require all FSEs to complete a permit application or exemption request and to obtain a FOG Control Permit or permit exemption letter prior to water service being granted. Additions and deletions to the list will be made based on changes in water service requests and records obtained from CCHD. As of October 29, 2008, there are approximately 107 FSEs in the service area.

Step 2. FOG Control Permit Application

All new and existing FSEs will be required to complete a FOG Control Permit Application, which will include a site map and any plans and specifications associated with the proposed grease interceptors, including mechanical and plumbing plans and details to show all sewers, sewer connections, and appurtenances by size, location, and elevation. This application is presented in Appendix B. This information is needed to assign Risk Ranking and permit conditions, including minimum size requirements for grease interceptors, as governed by the State Plumbing Code. WMU will provide assistance to FSEs in completing this information. Completed applications shall be mailed to:

Winchester Municipal Utilities
Attn: FOG Control Coordinator
150 North Main Street
P.O. Box 4177
Winchester, Kentucky 40392-4177



An application fee of \$25.00 is required to process the application. The FOG Control Permit application fee is a one-time fee paid to process the application. Updates to an FSE's permit application will not incur an additional fee if the permit has not expired. Updates to expired permits will require an additional fee. FSEs not submitting completed applications and fees will be subject to enforcement.

Step 3. Application Evaluation

Each completed and paid-for application will be reviewed for completeness. FSEs submitting incomplete information will be contacted for the missing information or will receive a letter of cause denying the application for processing and outlining the application's deficiencies. After reviewing the application and the applicable Service Call History, a Risk Ranking of low, medium, or high will be assigned. The Risk Ranking is used to determine: whether a FOG Control Permit is needed; permit conditions; frequency of inspections; and permit fee. The characteristics of each Risk Ranking category are shown in Table 1. The Risk Ranking of each FSE can change at any time based on inspections, Sewer Overflow Reports, or remodeling of the FSE infrastructure impacting the discharge of FOG. The annual permit fee will be assigned based on the FSE's Risk Ranking on October 1st the previous year. FSEs with a Risk Ranking of low will receive a letter notifying them of their permit exemption.



TABLE 1 – RISK RANKING

Category	Characteristics	Inspection Frequency
Low Risk – exempt	<input type="checkbox"/> Low risk of producing grease <input type="checkbox"/> Very low volume of food preparation <input type="checkbox"/> No history of grease problems in area <input type="checkbox"/> Adequate grease control	20% per year or more frequently as needed
Medium Risk	<input type="checkbox"/> Adequate grease control with risk of producing grease <input type="checkbox"/> Adequate grease control with frequent maintenance required <input type="checkbox"/> Grease control equipment undersized but properly maintained <input type="checkbox"/> Some history of grease problems in area	Annually
High Risk	<input type="checkbox"/> Insufficient grease control equipment <input type="checkbox"/> Insufficient maintenance of grease control equipment <input type="checkbox"/> Discharges of grease from FSE are impacting sewer system <input type="checkbox"/> History of persistent noncompliance	Semiannually or more frequently as needed



Phase 2:

Step 4. FOG Control Permits

Considering the FSE permit application, Risk Ranking, and applicable Service Call History, FOG Control Permits will be prepared for those FSEs with Risk Rankings of medium and high. An example permit is presented in Appendix C. Each permit will be effective for three years and will renew with a paid permit fee, provided compliance is maintained. Renewal fees for FOG Control Permits will be based on the FSE's October 1st Risk Ranking prior to the permitted period. The FOG Control Permit specifies the permit conditions, including but not limited to: recordkeeping, notification conditions, and standard conditions.

Step 5. Compliance

Inspections by WMU inspectors will be the principle tool used to monitor FSEs for compliance with their FOG Control Permit. The frequency with which a FSE will be inspected is based on their Risk Ranking. During a routine inspection, inspectors will inspect the FSE's cleaning and maintenance log, document that all required kitchen fixtures are served by a grease control device, and that their grease control device is adequately sized and in operating condition. Furthermore, WMU will determine if the FSE is implementing Best Management Practices as required in their permit. In addition, inspectors will review the Service Call History prior to inspection and inspect the sewer for any signs of grease accumulation. In addition to routine inspections, FSEs may be inspected as a result of a complaint or service call. Investigations are performed in an effort to identify the grease generating facility that is responsible for the blockage. Inspections may be made without notice. Each FSE must make itself available to escort the inspector in the facility. At the conclusion of each inspection, a signature of the FSE representative is required, and a copy of the inspection form will be provided. An example inspection form is presented in Appendix D. Authorized personnel of WMU, bearing proper credentials and identification, shall have the right to enter upon all properties subject to this program, at any time and without prior notification, for the purpose of inspection, observation, measurement, sampling, testing, or record review, in accordance with this program.



Step 6. Enforcement

Compliance assurance and enforcement actions will be taken by WMU personnel who observe violations of the FOG Control Program. The enforcement actions are outlined in WMU's FOG Control Enforcement Response Guide presented in WMU Policy and Procedures documents.



5.0 IMPLEMENTATION SCHEDULE

Task	Implementation	Completion
Revise WMU ordinance addressing FOG Control Program.	Phase 1	November 1, 2009
Distribute applications to all FSE's. Assist FSEs with completion of applications. Review applications.	Phase 1	January 1, 2010
Perform closed circuit television (CCTV) inspection of all FSE laterals from the discharge side and sanitary sewers downstream of the FSE discharge to aid in the identification of significant dischargers of FOG to the POTW	Phase 1	January 1, 2010
Assist all FSEs with the completion of a FOG Control Permit Application	Phase 1	January 1, 2010
Assign risk ranking to each FSE based on the completed FOG Control Permit Application	Phase 1	January 1, 2010
Determine discharge permit conditions, frequency of inspections, required monitoring and reporting by FSE, and permit fees	Phase 1	January 1, 2010
Develop specifications and design and construction standards for the FOG control devices. Develop protocols for assignment of risk, permitting of FOG dischargers, reporting by FOG dischargers, and monitoring of FOG dischargers	Phase 1	January 1, 2010
Produce FOG control training material to be used by Clark County Health Department in Food Manager Certification classes	Phase 2	February 1, 2010
Issue Permits or exemption letters to FSEs	Phase 2	April 1, 2010
Develop a Compliance Assistance Program for FSEs including educational materials and placards	Phase 2	April 1, 2010
Develop a public education program for reducing discharge of grease from private residences	Phase 2	April 1, 2010
Begin inspections in accordance with risk ranking scheduling	Phase 2	May 1, 2010



6.0 LEGAL AUTHORITY

A new division to the Winchester Code of Ordinances is required to implement the FOG Control Program. This Division (Division 12) includes definitions and authorization to issue permits specific to the FOG Control program. When applicable all other regulations cited in regulations cited in regulations cited in Divisions of Article V Discharge of Water and Waste Sections 14-115 to 14-217 remain in force.

DIVISION 12. FOG CONTROL PROGRAM

Sec. XX-XXX. Definitions

A glossary of key terms, including associated abbreviations, is presented here to facilitate understanding.

- *FOG Control Policy and Procedures Manual* – a document that describe the tools used to implement the FOG Control Program including a sample application, a sample permit, schedule of fees, grease interceptor sizing criteria, an enforcement response plan, and best management practices.
- *Food Service Establishment (FSE)* – facilities that discharge sanitary waste and that prepare and/or package food or beverages for sale or consumption, on or off-site, with the exception of private residences. FSEs include those establishments primarily engaged in activities of preparing, serving, or otherwise making food available for consumption by the public, such as food packagers, grocery stores, bakeries, restaurants, commercial kitchens, caterers, hotels, schools, hospitals, prisons, correctional facilities, and care institutions. Examples of food preparation activities utilized by FSE's include the following: cooking by frying (all methods), baking (all methods), grilling, sautéing, rotisserie cooking, broiling (all methods), boiling, blanching, roasting, toasting, or poaching.
- *General Manager* – the general manager of the Winchester Municipal Utilities Commission, or an authorized deputy, agent or representative.
- *Grease* – a material composed primarily of fats, oil, and grease from animal or vegetable sources. The term fats, oil, and grease (FOG) shall be deemed as grease by definition. Grease does not include petroleum-based products.

- *KPDES permit* – a Kentucky Pollutant Discharge Elimination System permit administered by the State and Federal Regulatory Authority authorizing the direct discharge to waters of the United States of America.
- *Notice of Violation (NOV)* – formal written notices to persons found to be violating any provision of the WMU Code of Ordinance.
- *Publicly owned treatment works (POTW)* – a treatment works as defined by Section 212 of the Act (33 U.S.C. 1292) which is owned, in this instance, by the city. This definition includes any sewers that convey wastewater to the POTW treatment plant, but does not include pipes, sewers, or other conveyances not connected to a facility providing treatment. For the purposes of this article, "POTW" shall also include any sewers that convey wastewaters to the POTW from persons outside the city who are, by contract or agreement with the city, users of the city's POTW.
- *Shall* – is mandatory; *May* is permissive.
- *WMU* – Winchester Municipal Utilities and/or its agents and employees.
- *WMUC* – the Winchester Municipal Utilities Commission.

Sec. XX-XXX. FOG Control Contribution Permits

(a) *Generally.* All FSEs proposing to connect to or to contribute to the POTW shall complete a FOG Control Permit application, and shall obtain a FOG Control Permit or a letter of exemption before connecting to or contributing to the POTW. All existing FSEs connected to or contributing to the POTW shall complete a FOG Control Permit application, and shall obtain a FOG Control Permit or letter of exemption within 180 days after the effective date of this article. This article shall apply to residents of the City of Winchester and to persons or entities outside the city who are, by contract or agreement with the city, users of the POTW. Failure to timely apply for and obtain, if required, a FOG Control Permit by an FDE shall be grounds for discontinuance of sanitary sewer service to an FSE. Except as otherwise provided herein, the General Manager shall administer, implement, and enforce the provisions of this article.

(b) *FOG Control Permit Application.* All FSEs must complete and file with WMU an application for a FOG Control Permit in the form prescribed in the FOG Control Program Policy and Procedures Manual, and must comply with all requirements specified in said Manual. A fee of



\$25.00 is required to process the application. WMU shall evaluate the data furnished by the FSE and may require additional information. After evaluation the data furnished, WMU shall issue a FOG Control Permit, or a letter of exemption, or reject such permit subject to the terms and conditions provided herein.

(c) *FOG Control Permit.* Permits shall be issued for a specified time period, not to exceed three (3) years. A permit may be issued for a period of less than one year and a specific expiration date may be stated. The FSE shall apply for permit reissuance at least four (4) months prior to the expiration of the FSE's existing permit. The terms and conditions of the permit may be subject to modification by WMU during the term of the permit as limitations or requirements contained in this article or other applicable regulations are amended or when other just cause exists. The FSE shall be notified of any proposed changes in its permit at least thirty (30) days prior to the effective date of the modification. Any modifications or new conditions in the permit shall include a reasonable schedule for compliance. FOG control permits shall be issued to a specific FSE for a specific operation at a specific location. A permit shall not be assigned, transferred, or sold to a new owner, new FSE, different premises, or a new or changed operation without the written approval of WMU. Any succeeding owner or the FSE operation shall comply with all terms and conditions of the permit and the training provisions of the FOG Control Policy and Procedures Manual.

(d) *Enforcement.*

1. *Suspension of Services:* FOG Control Permit WMU may suspend the wastewater treatment service and/or a FOG Control permit when such suspension is necessary, in the opinion of the General Manager, in order to stop an actual or threatened discharge in violation of the ordinance which presents or may present an imminent or substantial endangerment to the health or welfare of persons or to the environment, causes or may cause damage or interference to the POTW, or causes or may cause WMU to violate any condition of its KPDES permit. Any person notified of a suspension of the wastewater treatment service and/or the FOG Control permit or shall immediately stop or eliminate the contribution. In the event of a failure of the person to comply voluntarily with the suspension order, WMU may take such steps as are deemed necessary, including immediate severance of the service connection, to prevent or minimize damage to the POTW or endangerment to any person. WMU shall reinstate the FOG



Control permit and/or and/or the wastewater treatment service upon proof of the elimination of the noncomplying discharge. A detailed written statement submitted by the FSE describing the causes of the harmful contribution and the measures taken to prevent any future occurrence shall be submitted to WMU within fifteen (15) days of the date of occurrence. The General Manager shall report to the WMU Commission as soon as feasible the suspension of any permit hereunder.

2. Revocation: Any FSE who violates the following conditions of this article, or applicable state and federal regulations, is subject to revocation of its permit.
 - (a) Failure of FSE to report factually his/her FOG discharge;
 - (b) Failure of a FSE to report significant changes in operations;
 - (c) Refusal of reasonable access to the FSE's premises for the purpose of inspection or monitoring;
 - (d) Violation of any condition of the permit.

3. Notice of violation: Whenever WMU, through its General Manager, finds that any FSE has violated or is violating this article, his/her FOG Control permit, or any prohibition, limitation or requirement contained herein, the General Manager may serve upon such person a written notice stating the nature of the violation, and a FSE shall, within fifteen (15) days of the date of the notice, submit a plan for satisfactory correction to WMU. WMU will follow WMU's FOG Control Enforcement Response Guide published in WMU's FOG Control Policy and Procedures Manual to evaluate the type of noncompliance, nature of violation, and to determine the appropriate enforcement response. The General Manager shall provide the WMUC with a copy of the notice of violation sent to the FSE.

4. Hearing:
 - (a) Any FSE who has been subject to an enforcement action or suspension of service or notice of violation may request in writing an informal conference with the General Manager. Upon receipt of the request, the General Manager shall hold the informal conference within ten (10) days. If the enforcement action is not resolved, a hearing before the WMUC may be requested by delivery of a



written request to the Chairman. Upon receipt of such request, WMUC shall schedule a hearing to be held as soon as practicable after the request is received.

(b) The WMUC may itself conduct the hearing or may designate one of its members to do so.

(c) A FSE who has requested a hearing shall be given timely notice of the time and place of such hearing and shall have the right to present all relevant evidence on behalf of the FSE by testimony of witnesses and demonstrative evidence of its choosing.

(d) Such hearing shall be conducted as an administrative, evidentiary hearing, with testimony taken under oath and recorded stenographically.

(e) Upon a finding by WMUC that a FSE is in violation, the WMUC may issue such orders as may be necessary to procure compliance by the FSE with its permit or this ordinance or to terminate the violations, including ordering sewer service suspended until appropriate corrective action is taken, the imposition of civil penalties of not less than \$100 and not greater than \$1,000 for each violation assessment of the reasonable costs related to the hearing, and such further orders and directives as are necessary and appropriate.

5. Fees: Fees for FOG Control permit applications and FOG Control permits will be assessed under the authorization of Division 10 of the Code Ordinances, of the City of Winchester and according to the current fee schedule published in WMU's FOG Control Policy and Procedure Manual.



7.0 FOG CONTROL PROGRAM STANDARDS

WMU will require all significant FSEs participating in the preparation and serving of food or having the potential of producing fats, oils, and grease to have and maintain a grease interceptor. The goal of the FOG Control Program is to prevent significant concentrations of oil and grease from entering the WMU sewer system. To accomplish this goal, standards will be adopted that apply to all FSEs.

7.1 External Interceptor Requirements

Unless an exception is made by the WMU Commission, all FSEs should install an external grease interceptor. For an explicit definition of what constitutes a Food Service Establishment, see Section 3.0 Definitions. For the conditions governing exceptions and exemptions, see Section 7.2 Internal Interceptor Requirements and Section 7.3 Waivers (Exemption).

7.1.1 Design and Construction Standards

Grease interceptors to be installed shall conform to the WMU Ordinance, the State Plumbing Code, and the applicable WMU Standard Drawing (Appendix F). The required interceptor shall be designed according to the most stringent of the above current standards and approval of the interceptor shall be determined by WMU upon review of the proposed facility. The interceptor shall be located so as to be readily and easily accessible for cleaning and inspection. The minimum capacity of the interceptor is 1,000 gallons.

Grease interceptors are to be constructed of impervious materials capable of withstanding abrupt and extreme changes in temperature. They are expected to be of substantial construction, watertight, and equipped with easily removable covers that, when bolted in place, shall be gastight and watertight. Each FSE is expected to provide protection against accidental discharge of grease and oil. Features that prevent accidental discharge of these materials shall be provided and maintained at the FSE's expense. Operating procedures which are intended to provide this protection, and details and specifications of the equipment which is intended to provide this protection, shall be submitted to WMU for review and approval prior to construction of the facility. Review and approval of such plans and operating procedures by WMU shall not relieve the FSE of the responsibility to modify its facility as necessary to meet the requirements of this chapter.



7.1.2. Maintenance

External grease interceptors shall be cleaned on a regular basis, at a frequency which will ensure proper and efficient operation. This frequency shall not be less than one time within a six-month period. Cleaning shall consist of removal of the entire contents of the device, including grease cap and sludge pocket, and inspection of the empty device for defects and/or obstructions that would prevent proper function.

All waste removed from each grease interceptor must be disposed of at a grease receiving facility equipped to receive such waste in accordance with the provisions of this program. In no way shall the pumpage be returned to any private or public portion of the sanitary sewer system. All pumpage from grease interceptors must be tracked by a manifest which confirms pumping, hauling, and disposal of waste. The FSE customer must obtain a copy of the original manifest from the hauler. The original manifest with original signatures must be left at the disposal facility.

A Grease Interceptor Cleaning Record Maintenance Log and/or pumping manifest indicating each pumping for the previous 36 months will be maintained by each facility required to install a grease interceptor. This log shall include the date, time, amount pumped, hauler, and disposal site and will be kept in a conspicuous location for inspection. Said log will be made immediately available to the WMU representative upon request. An example grease interceptor cleaning and maintenance form is presented in Appendix G.

7.2 Internal Interceptor Requirements

FSEs that cannot install an external grease interceptor due to space constraints, plumbing, or other issues shall apply for a permit to install an internal interceptor. Based on information provided on the permit application, WMU inspectors will decide the location of installation of the interceptor, the interceptor size, and the cleaning frequency.

7.2.1. Design and Construction Standards

Internal interceptors must conform to the Uniform Plumbing Code and State Plumbing Code.



7.2.2. Maintenance

Approved internal or under-counter interceptors shall be cleaned at least once per week. Cleaning shall consist of removal of the entire contents of the device, including grease cap and sludge pocket, and inspection of the empty device for defects and/or obstructions that would prevent proper function. The permit will contain the requirement for frequency of pumping.

Cleaning of internal interceptors may be performed by an outside contractor or by FSE staff at the discretion of the FSE. All grease and food debris must be disposed of properly and must not enter the sanitary sewer.

7.3 Waivers (Exemption)

A food service and/or preparation facility that demonstrates that the discharge from its food service and/or preparation activities contains less than 100 mg/l of grease may receive an exemption from minimum sizing requirements or installation and maintenance requirements. The sampling and testing to demonstrate the concentration of grease in the discharge must be conducted, at the facility's expense, by an independent testing organization and must be measured in accordance with the analytical test procedures established in the most recently amended version of 40 CFR 136 at the time of the testing. The facility will complete an application and request an exemption from the WMU Commission. Information from the application and from the FSE is used to determine the need for a grease interceptor.

7.4 Prohibited Discharges to Interceptors

Black water shall not be discharged to the grease interceptor.

Floor drains that discharge or have the potential to discharge grease shall be connected to a grease interceptor.

Solid food waste products should be disposed of through normal solid waste/garbage disposal procedures. The use of garbage disposals that discharge to the sanitary sewer is discouraged within the WMU wastewater service area, but in the event that the device is used in a commercial or industrial facility, it must be connected to an appropriately sized external grease interceptor.



Commercial dishwasher connections must be connected to an external grease interceptor. Under rare circumstances, exceptions may be made at the discretion of the WMU Commission. Although not recommended, FSEs may allow any fixture to remain connected to an external grease interceptor, except fixtures that may discharge black water.

FSEs must not connect janitor sinks or black water fixtures to a grease interceptor.

Any additive(s) placed into the grease interceptor or building discharge line system on a constant, regular, or scheduled basis shall be reported to WMU. Such additives shall include, but not be limited to: enzymes; commercially available bacteria; or other additives designed to absorb, purge, consume, treat, or otherwise eliminate fats, oils, and grease. The use of additives shall in no way be considered as an acceptable substitution for the maintenance procedures required herein.



8.0 BEST MANAGEMENT PRACTICES

Each FSE will need to implement Best Management Practices (BMPs) in its operation to minimize the discharge of FOG to the sewer system. The FSE will need to follow BMPs for handling and disposal of fats, oils, and grease.

8.1 General

- Segregate and collect waste cooking oil, grill scrapings, and pan drippings.
- Scrape food scraps into garbage prior to washing.
- Post kitchen signage to remind employees that no grease should be discharged into sinks or drains.
- Conspicuously post Best Management Practices in all kitchen areas.
- Dry-wipe pots, pans, cookware, and work areas before washing.
- To prevent odors and leakage, dispose of food waste and solids in enclosed plastic bags prior to disposal in trash bins.
- Locate absorption products in a conspicuous area in the kitchen. Use absorption products to clean under fryer baskets and other locations where grease may be spilled or dripped.
- Dispose of grease and oils from cooking equipment in a grease receptacle or recycling container such as a barrel or drum. Avoid spilling.
- Educate employees about BMPs.

8.2 External Interceptors

- Certified Food Managers should supervise the grease hauler during pumping to ensure that all grease and liquid is removed from the interceptor and to visually inspect the trap for broken baffles, cracks, or other defects.



8.3 Internal Interceptors

- Plates, dishes, bowls, and other cookware must be dry-wiped and pre-rinsed before being placed in the dishwasher. Garbage disposals must not be used in FSEs that do not have external interceptors. Dishwashers may not be attached to an internal grease interceptor, and care must be taken to eliminate as much grease from cookware as possible before washing.

9.0 COMPLIANCE AND ENFORCEMENT

9.1 Construction Inspections Protocol

Authorized personnel of WMU, bearing proper credentials and identification, shall have the right to enter upon all properties subject to this program, at any time and without prior notification, for the purpose of inspection, observation, measurement, sampling, testing, or record review, in accordance with this program. An inspection protocol and an inspection form have been developed for WMU's inspectors to ensure proper installation of interceptors. Both documents are included in Appendix H for reference.

9.2 Compliance Inspections Protocol

An inspection protocol and an inspection form have been developed for WMU's inspectors to ensure proper compliance with WMU's ordinance and FSE's permit. The inspection schedule is shown in Table 1. Both documents are included in Appendix E for reference.

9.3 Compliance Assistance Program for FSEs

Phase 1 - FOG Awareness Campaign for Food Service Establishments

- Develop and distribute fact sheet about the FOG Control Program to FSEs when FOG application surveys are being distributed (examples located in Appendix I)
- Distribute BMPs and no-grease signs

Phase 2 - FOG Awareness Campaign for FSEs



- Through on-site inspections of FSEs, the inspector will monitor compliance and give the FSEs feedback on their efforts to control FOG
- Through a memorandum of understanding with the Clark County Health Department, FOG control training will be implemented as part of the Food Manager Certification class. All Food Service Establishments in Clark County are required to have a Certified Food Manager on site at all times. Food Manager Certification must be renewed every three years, so the inclusion of FOG control education with the certification classes increases the accountability of the FOG Control Program and emphasizes the importance of FOG control requirements.

9.4 Enforcement

Compliance assurance and enforcement actions will be taken by WMU personnel who observe violations of the FOG Control Program. The enforcement actions are outlined by WMU's Enforcement Response Guide presented in the current Division 10 and 11 of the WMU Ordinance and Industrial Pretreatment Program. These divisions of the ordinance are contained in Appendix E.



10.0 PUBLIC EDUCATION FOR PRIVATE RESIDENCES

Several education program strategies are being considered to educate residential customers on FOG Control issues. These programs will be conducted in both Phase 1 and Phase 2 of the FOG Control Program implementation. Some of the programs being considered include:

Phase 1 - FOG Awareness Campaign for Residential Customers

- Develop fact sheets and brochures about FOG reduction in residential kitchens and how this can prevent sanitary sewer overflows that harm the environment (examples located in Appendix J);
- Identify neighborhoods with grease problems, and mail educational materials to residents and Neighborhood Associations in these areas;
- Collaborate with Neighborhood Associations/local groups to communicate with the public about residential FOG reduction by speaking at meetings or tabling at events;

Phase 2 - FOG Awareness Campaign for Residential Customers

- Communicate with Neighborhood Associations/local groups on success of Phase 1 and plans for Phase 2; and
- Work with Government Communications to produce public service announcements about FOG for Government Television on local channel 5.



11.0 STAFFING & EQUIPMENT REQUIREMENTS

Approximately 107 FSEs are connected to the WMU sewer system. An estimate of the Risk Ranking profile of FSEs is as follows in Table 2.

TABLE 2 – NUMBER OF FSES AND RISK RANKING

Risk Ranking Category	Number of FSEs
Exempt	27
Medium Risk	65
High Risk	15
Total	107

All FSEs will be required to complete permit applications for Risk Ranking evaluation. Distribution, completion, evaluation, and action on these applications are scheduled to be completed by the end of 2009. Exempt FSEs will be mailed exemption letters. Permits will be written for those FSEs with Risk Rankings of medium or high. Those FSEs with Risk Rankings of low, medium, and high will be inspected per the schedule in Table 1. An outline of the man-hours needed to complete these tasks is presented in Table 3. Because the effort of initiating the new program is greater than the effort of maintaining the established program, the table is divided into a “Year 1” analysis and an “Annually Thereafter” analysis.



TABLE 3 – ESTIMATE OF MAN-HOURS REQUIRED TO IMPLEMENT FOG CONTROL PROGRAM

	Task	Hours
Year 1	Obtain list	20
	Distribute applications	40
	Provide FSE assistance/education	8
	Collect applications	40
	Review for completeness	32
	Follow up on delinquent application/information	16
	Evaluate FSE applications	40
	Issue permits and exemption letters	20
	Inspect FSEs with low risk ranking	5
	Inspect FSEs with medium risk ranking	65
	Inspect FSEs with high risk ranking	30
	Enforcement action	16
	Evaluate program effectiveness	8
	Total	340
Annually*	Update list	4
Thereafter	Distribute, collect, and evaluate applications, issue permits/exemptions, and follow-up on delinquent permits.	20
	Inspect Risk Ranking Low	5
	Inspect Risk Ranking Medium	65
	Inspect Risk Ranking High	30
	Enforcement action	16
	Evaluate program effectiveness	8
	Total	148

*Because permits will be re-issued on a three-year cycle, this annual effort is a yearly average based on a three-year period.



In addition to the manpower, the staff will need vehicles to conduct the inspections, office supplies to prepare and distribute permits and inspection forms, sufficient computer hardware and software, and sufficient internet connections to efficiently administer the programs. An estimated program cost is presented in Table 4. Because the cost of initiating the new program is greater than the cost of maintaining the established program, the table is divided into a "Year 1" analysis and an "Annually Thereafter" analysis. An estimate of program revenue follows in Table 5.

**TABLE 4 – ESTIMATED ANNUAL PROGRAM COST
(BASED ON 2009 DOLLARS)**

	Item	Amount
Year 1	Staff hrs w/ benefits (assume \$50/hr X 340 hrs)	\$17,000
	Field equipment, office computer/software	\$325
	Total	\$17,325
Annually* Thereafter	Staff hrs w/ benefits (assume \$50/hr X 148 hrs)	\$7,400
	Field equipment, office computer/software	\$325
	Total	\$7,725

*Because permits will be re-issued on a three-year cycle, this annual cost is a yearly average based on a three-year period.

**TABLE 5 – ESTIMATED ANNUAL* PROGRAM REVENUE
(BASED ON 2009 DOLLARS)**

Revenue Sources	Fee
Application fees	107 x \$25°/3 ≈ \$892
Risk Ranking Exempt	\$0
Risk Ranking Medium	65 x \$75°/3 = \$1,625
Risk Ranking High	15 x \$150°/3 = \$750
Total	\$3,267

*Because permits will be re-issued on a three-year cycle, this annual cost is a yearly average based on a three-year period.



12.0 PERFORMANCE INDICATORS

The goal of the FOG Control Program is to prevent grease from entering the WMU wastewater system. Efforts to accomplish this goal will include:

- Surveying all FSEs and conducting selected inspections;
- A public education effort aimed at residential customers to inform them of measures they can take to reduce the volume of household grease discharged to the sewer;
- Working within specific neighborhoods where grease-related buildup or blockages is a recurring problem to communicate with residents, identify sources of the problem, and engage the community's help in eliminating the problem; and
- Enforcement against dischargers who are found to be in violation of WMU's ordinance concerning grease discharges.

WMU will measure its success toward the accomplishment of this goal in the following manner.

- Number of SSOs due to grease
- Amount of grease removed via manifest review
- Number of Notices of Violation issued
- Percentage of compliant inspections to total inspections
- Number of individuals trained as Certified Food Managers (via Clark County Health Department)
- Number of facilities classified as high risk
- Number of FSE sewer line segments on preventative maintenance schedules

APPENDICES

APPENDIX A – FSE LIST



**Winchester Municipal Utilities (WMU)
Log of Food Service Establishments (FSEs)
16-Jul-09**

No	FSE Name	Street Address	Info Source	Sewershed ID	Manhole ID	Comments
1	Animal Crackers Discovery Center	10 Canary Lane	CCHD	15	172B	
2	Animal Crackers Too	121 E. Lexington Ave	CCHD	12	20	
3	Apple Mart	270 Van Meter Rd	CCHD	15	34	
4	Applebee's Neighborhood Bar and Grill	1525 W. Lexington Ave	CCHD, WMU Water	15	41	no map number
5	Arpy's	Bypass Road	CCHD, WMU Water			
6	Ark of Mercy	254 Winn Ave	CCHD	20	25A	
7	Audra's South Main Grocery	83 S. Main Street	WMU Water	14	212	
8	Bailey's Café	39 S Main Street	CCHD	9	91	
9	Banana's on the River	Ford Road	WMU Water			
10	BA's Nashville Station	5 Shopper's Dr	CCHD	15	68	no sewer
11	Beech Springs Farm Market	4776 Old Boonesboro Rd	CCHD			same as Cooter's Brown
12	B-Kwik Food Mart	50 Hubbard Rd	CCHD	13	4	no sewer
13	Boone's Creek Baptist Camp	1306 Trapp-Goff's Corner Rd	CCHD			
14	Broadway Corner Market	151 E. Broadway	CCHD	12	4	
15	Burger King	1199 W. Lexington Rd	CCHD, WMU Water	16	214	
16	Calloway Market Deli	110 Calloway St	CCHD	12	26	
17	Galvary Kids Christian School	15 Redwing Dr	CCHD	15	175C	
18	Cantuckee Diner	12 Carol Road	CCHD, WMU Water	16	19	
19	Captain D's	900 Bypass Rd	CCHD, WMU Water	15	114	
20	Cassell Creek Golf Course	4199 Lexington Rd	CCHD			no sewer
21	Cassidy's Snack Bar	645 Westmeade Dr	CCHD	8	346	
22	Central School	Mt. Sterling Road	CCHD	20	81C	
23	China King	1 S. Main St	WMU Water			out of business
24	Clark Co Association for Handicapped Citizens	150 Maryland Ave	CCHD	10	211	
25	Clark Co Bingo	840 Bypass Rd	CCHD			
26	Clark Co Christian School	Colby Rd	CCHD	15	302	no longer serving food
27	Clark Middle School	1 Educational Plaza	CCHD	15	90	
28	Clark Regional Medical Center	W. Lexington Ave	CCHD	16	225	part of IPT
29	Clark-Bourbon Day Treatment	100 Vaught Rd	CCHD	13	57	
30	Combs Ferry Kitchen	6611 Combs Ferry Rd	CCHD			no sewer
31	Conkright Middle School	Mt. Sterling Road	CCHD	20	82B	
32	Cooter's Brown	5 Shopper's Dr	WMU Water	15	68	same as Nashville Station
33	Corner Drug Lunch	26 E. Broadway	CCHD, WMU Water	9	86	
34	Corner Grill	1 N. Main Street	CCHD	9	80	
35	Country Boy Food Store	109 Ecton Road	CCHD	20	204	same as #14
36	D & E Market	51 E Broadway	WMU Water	12	4	
37	D & V Loving Hands Child Care	20 Thoroughbred Plaza	CCHD	16	95	number not on map
38	Dairy Queen	1422 Fulton Rd	CCHD, WMU Water	15	103C	
39	Dairy Queen	55 N Main St	CCHD, WMU Water	9	83	
40	Domino's Pizza	1476 W Lexington Ave	CCHD, WMU Water	16	51	
41	El Camino Real	20 Carol Rd	CCHD, WMU Water	12	21	
42	Everman's Grocery	375 E Washington St	CCHD	12	170	
43	Fairview Market	59 E Washington St	WMU Water	9	167	
44	Fannie Bush School	N. Main St	CCHD	15	29A	
45	Fast Stop	1140 Bypass Rd	CCHD		167	



**Winchester Municipal Utilities (WMU)
Log of Food Service Establishments (FSEs)
16-Jul-09**

No	FSE Name	Street Address	Info Source	Sewershed ID	Manhole ID	Comments
46	Fazoli's	16 Carol Rd	CCHD, WMU Water	16	19	
47	Forest Park Snack Bar	201 Forest Ave	CCHD, WMU Water	10	240	
48	Fox's Store	11220 Irvine Rd	CCHD			no sewer
49	Frisch's	873 Bypass Rd	CCHD			new line not on map
50	Gaunce's Deli & Café	853 Bypass Rd	CCHD, WMU Water			
51	George Rogers Clark High School	Boone Ave	CCHD	13	31	
52	Giovanni's	728 Boone Ave	CCHD	13	5A	
53	Goff's Corner Market	12335 Ironworks Rd	CCHD			no sewer
54	Golden Corral	1501 Bypass Rd	CCHD, WMU Water	15	230	
55	Golden Rule Christian Daycare	1 Talbott Ave	CCHD	10	96A	
56	Great Wall	1105 Pioneer Dr	CCHD, WMU Water	15	102	
57	Green's Forest Grove Grocery	4636 Old Boonesboro Rd	CCHD			no sewer
58	Guerrant Mountain Mission B & B	21 Valentine Ct	CCHD			history museum?
59	Hall's on the River	1225 Athens-Boonesboro Rd	CCHD			no sewer
60	Hannah McClure School	Beckner St	CCHD	10	112	
61	Hardee's	1466 W. Lexington Ave	CCHD	16	51	
62	Hardy Mart	108 Rolling Hills Lane	CCHD, WMU Water	19	87G	
63	Hays Street Market	37 Hays Ct	CCHD, WMU Water	10	98	
64	Hickman Street Grocery	208 E. Hickman St	CCHD, WMU Water	12	60	
65	J & B Food Mart	4 W. Washington St	WMU Water	9	79G	
66	Jade Garden	1623 Bypass Rd	CCHD, WMU Water	15	228	
67	JK's Café	50 S. Main St	CCHD	9	109	
68	Kentucky Fried Chicken	Carol Rd	CCHD, WMU Water	16	18A	
69	Kentucky River Foothills Headstart	32 Meadow St	CCHD	10	155	
70	Kid-Doodles	1004 W. Lexington Ave	CCHD	16	253	
71	Kid's Discovery Center	9 Bloomfield Rd	CCHD	16	270	
72	Kidz Haven Early Learning Center	75 Westwood Dr	CCHD	15	165	
73	Kingdom Kids Christian Daycare	127 E. Hickman St	CCHD	12	23	
74	Kroger	1661 Bypass Rd	CCHD, WMU Water	15	235	
75	Little Caesar's Pizza	1910 Bypass Rd	CCHD, WMU Water			
76	Loving Touch Learning Center	5835 Lexington Rd	CCHD			no sewer
77	Maple Street Market	20 N. Maple St	WMU Water	11	23A	Scottys?
78	McDonalds	20 Fulton Rd	WMU Water	15	110	?
79	McDonalds	4 Shoppers Village Dr	WMU Water			C.O. upstream from 15
80	McDonalds	1520 W. Lexington Ave	CCHD	15	70	
81	Mi Finca	1 Shopper's Dr	CCHD			
82	Miller's Market	12435 Ironworks Rd	CCHD			no sewer
83	Morse Brothers Culinary (Winchester Country Club)	410 Boone Ave	CCHD, WMU Water	14	174	no number on map
84	My Place	13 S. Bloomfield Rd	WMU Water	DNE		
85	O.F. Shearer School	E. Broadway	CCHD	12	115A	
86	P & T Petro	1330 Fulton Rd	CCHD	15	111	
87	Papa John's Pizza	1607 Bypass Rd	CCHD	15	228	No food service
88	Peddler's Mall Snack Bar	110 Shopper's Plaza	CCHD	15	74	
89	People Helping People	19 Wainscott Ave	CCHD	10	130	
90	Pilot View Elementary	7501 Ironswork Rd	CCHD			no sewer



**Winchester Municipal Utilities (WMU)
Log of Food Service Establishments (FSEs)
16-Jul-09**

No	FSE Name	Street Address	Info Source	Sewershed ID	Manhole ID	Comments
91	Pilot View Mini Mart	7695 Ironswork Rd	CCHD			no sewer
92	Playhouse Poolroom	27 N. Main St	CCHD	9	82	
93	Popeye's	1 Bullion Blvd	WMU Water	15	223B	
94	Providence Elementary School	Old Boonesboro Rd	CCHD	15	458	no sewer
95	Rainbow Bingo	4449 Rockwell Rd	CCHD	16	12	
96	Rally's Hamburgers	1478 W. Lexington Ave	CCHD, WMU Water	9	96	
97	River Rat Enterprises (Engine House Deli)	9 W. Lexington Ave	CCHD, WMU Water	12	167	
98	Rod's Fairview Market	359 E Washington St	CCHD	15	188	
99	Rosemary C. Brooks Place	200 Rosemary Dr	CCHD	16	1A	closed
100	Sat's Pizza	14 Winchester Plaza	WMU Water	11	23A	
101	Scotty's Food Mart	699 N Maple St	CCHD			no sewer
102	Shopper's Market	5920 Lexington Rd	CCHD			private
103	Sid's Place	1940 Bypass Rd	CCHD	15	70	
104	Sir Pizza	152 Shopper's Village	CCHD, WMU Water	9	80	
105	Sister's Café	12 S. Main St	WMU Water	15		no sewer
106	Skyview Drive-In	5909 Lexington Rd	CCHD	15	229	
107	Sonic	1505 Bypass Rd	CCHD, WMU Water	14	212	
108	South Main Grocery	385 S. Main St	CCHD	8	174A	
109	Southwind Sports Club	2480 New Boonesboro Rd	CCHD, WMU Water	16	31A	
110	Speedway	1480 W Lexington Ave	CCHD	15	226	
111	Speedway	1695 Bypass Rd	CCHD	9	97B	
112	Speedway	39 S Maple St	CCHD	9	119	
113	St. Agatha Academy	244 S Main St	CCHD, WMU Water	20	435	
114	Stamper's Grocery	41 Sterling St	WMU Water	15	90E	
115	Stode Station Elementary	2 Education Plaza	CCHD	4	109	
116	Subway	44 S Main St	CCHD, WMU Water	15	132	
117	Subway	740 Bypass Rd	CCHD, WMU Water	15	132B	
118	Subway @ Walmart	1859 Bypass Rd	CCHD	15	184B	
119	Taco Bell	10 April Way	CCHD, WMU Water			does not exist
120	Tacos Too	Shoppers Dr	WMU Water			no sewer
121	The Boathouse at Riverview Marina	400 Athens-Boonesboro Rd	CCHD			
122	The Craft Nook	1007 W Lexington Ave	CCHD	16	239	
123	The Freeman Corporation	415 Magnolia St	CCHD	19	145	
124	The Steak House	1464 W. Lexington Ave	CCHD, WMU Water	16	39	
125	Thompson Catering	841 Bypass Rd	CCHD			same as Frischs
126	Tipton's Grocery	75 E Washington St	WMU Water			same as Evermans
127	Trapp School	Irvine Rd	CCHD			no sewer
128	Vittorino's Cucina Italian	30 N. Main St	CCHD	9	79A	closed
129	Waffle House	2 Carol Rd	CCHD, WMU Water	16	8	
130	Walmart	1859 Bypass Rd	CCHD, WMU Water	15	132B	no sewer
131	Waterfront Café	220 Athens-Boonesboro Rd	CCHD			
132	Wendy's	1475 W. Lexington Ave	CCHD, WMU Water	16	22	
133	Wesley Woods Camp Cafeteria	800 Epperson Rd	CCHD			no sewer
134	Winchester 96 Truck Stop	510 Rollings Hill Lane	CCHD, WMU Water	19	159	
136	Winchester Centre	200 Glenway Dr	CCHD	15	9	



**Winchester Municipal Utilities (WMU)
Log of Food Service Establishments (FSEs)
16-Jul-09**

No	FSE Name	Street Address	Info Source	Sewershed ID	Manhole ID	Comments
137	Winchester Christian Academy	2410 Lexington Rd	CCHD	15	558	
138	Winchester Elks Lodge		CCHD, WMU Water			No food service
139	Winchester Opera House	10 E. Lexington Ave	CCHD	9	109	
140	Winchester Pizza Hut	8 Carol Rd	CCHD, WMU Water	16	18A	
141	Winchester Sea Foods	11 Carol Rd	WMU Water			razed
142	Winchester Shell	105 April Way	CCHD	15	184B	
143	Winn Ave Market	5 Winn Ave	WMU Water			
144	Wonderland Day Care	406 W. Lexington Ave	CCHD	10	136	
145	Wonderland Learning Academy	100 Mimosa Dr	CCHD			treehaven
146	Woody's Sports Bar & Grill	923 Bypass Rd	CCHD	15	95	
147	The Tea Room	624 W Lexington Ave	WMU Water	10	253	
148	Barton's	120 April Way Drive	WMU Water	15	184B	
149	Breaking Bread	17 Wainscott Street	WMU Water	10	130	
150	Asian, Taste of (Kung Pao)		WMU Water	15	133	
151	The Big Easy	836 Bypass Road	WMU Water	15	131	

Key:
CCHD = Clark County Health Dept
WMU Water = WMU Water Service Accounts

APPENDIX B – FOG CONTROL PERMIT APPLICATION



Winchester Municipal Utilities (WMU)

FOG CONTROL PERMIT APPLICATION FOR FOOD SERVICE ESTABLISHMENTS

Please choose one description that best describes your facility:

- New Food Service Establishment Existing Food Service Establishment
- Food Service Establishment with Recent Modification

Section A - Facility Information:

1. Facility Name _____
2. Facility Street Address _____ Zip _____
Facility Phone Number _____
3. Business Mailing Address (if different from 2. above)
Street _____ Zip _____
4. Owner of Premises (if different from facility owner)
Name _____
Address _____
Telephone Number _____
5. Designated signatory authority of the facility
Name _____
Title _____
Address _____
Telephone Number _____ Email Address _____
6. Designated Facility Contact
Name _____
Title _____
Telephone Number _____ Email Address _____
7. For existing FSE, name as it appears on water bill: _____
Water Service Account Number (s): _____

Section B – Facility Operational Characteristics:

1. Please choose one description that best describes your facility:

- | | | |
|--|--|---|
| <input type="checkbox"/> Fast Food Restaurant | <input type="checkbox"/> Full Service Restaurant | <input type="checkbox"/> Nursing home |
| <input type="checkbox"/> Drive Through (only) | <input type="checkbox"/> Seasonal Restaurant | <input type="checkbox"/> Hotel/Motel |
| <input type="checkbox"/> Coffee Shop | <input type="checkbox"/> Bakery | <input type="checkbox"/> Supermarket |
| <input type="checkbox"/> Religious Institution | <input type="checkbox"/> School/College | <input type="checkbox"/> Club/Organization |
| <input type="checkbox"/> Company/Office Building | <input type="checkbox"/> Ice Cream Shop | <input type="checkbox"/> Hospital |
| <input type="checkbox"/> Caterer | <input type="checkbox"/> Bar/Lounges | <input type="checkbox"/> Convenience Stores |
| <input type="checkbox"/> Meat Markets | <input type="checkbox"/> Cafeteria | <input type="checkbox"/> Fruit & Vegetable Market |
| <input type="checkbox"/> Other _____ | | |

2. Please indicate each item that you currently or will have in your facility and the quantity of each:

- | | | |
|---|--|---|
| <input type="checkbox"/> ___ Grill | <input type="checkbox"/> ___ Oven | <input type="checkbox"/> ___ Dishwasher |
| <input type="checkbox"/> ___ Pre Rinse Sink | <input type="checkbox"/> ___ Mop Sink | <input type="checkbox"/> ___ Deep Fryer |
| <input type="checkbox"/> ___ Floor Drains | <input type="checkbox"/> ___ Tilt Kettle/Crock Pot | <input type="checkbox"/> ___ Garbage Disposal |
| <input type="checkbox"/> ___ Three Bay Sink | <input type="checkbox"/> ___ Two Bay Sink | <input type="checkbox"/> ___ Single Bay Sink |
| <input type="checkbox"/> ___ Hand Sinks | <input type="checkbox"/> ___ Other Equipment | |

3. Provide a copy of the indoor and outdoor plumbing floor diagrams, which should include the location of all water meters, facility sewer connections, grease interceptors, sinks, floor drains, dishwashers, restrooms, etc.
4. Provide a site map with your building's footprint. Include surrounding streets and landmarks, and connections to the Publicly-Owned Treatment Works (POTW).
5. What is the seating capacity at your facility? _____
6. Please indicate your facility's standard hours of operation.

Monday _____	Tuesday _____	Wednesday _____
Thursday _____	Friday _____	Saturday _____
Sunday _____		

Section C– Treatment:

1. Do you have a grease interceptor at your facility? _____
2. Complete the following for all grease removal device(s) and attach manufacturer's specifications for all internal and external interceptors.

a. Make and Model _____
 Capacity (gal) _____ or (lb) _____
 Passive _____ or Automatic _____
 Indoor _____ or Outdoor _____
 Cleaning frequency _____
 Location _____
 (under 3-bay sink, in basement, outside in ground, etc)

b. Make and Model _____
 Capacity (gal) _____ or (lb) _____
 Passive _____ or Automatic _____
 Indoor _____ or Outdoor _____
 Cleaning frequency _____
 Location _____
 (under 3-bay sink, in basement, outside in ground, etc)

c. Make and Model _____
 Capacity (gal) _____ or (lb) _____
 Passive _____ or Automatic _____
 Indoor _____ or Outdoor _____
 Cleaning Frequency _____
 Location _____
 (under 3-bay sink, in basement, outside in ground, etc)

3. If the INDOOR grease interceptor (trap) is being maintained onsite, how do you dispose of the waste after cleaning the device?
- Trash Contractor disposes of grease Recycle Other _____
4. If a contractor(s) cleans the INDOOR or OUTDOOR grease removal device(s), please list the following:
- a. Contractor Name _____
 Address _____
 Telephone Number _____
- b. Contractor Name _____
 Address _____
 Telephone Number _____
5. Are there any additives placed in the plumbing, grease interceptor (trap) (i.e. enzymes, bacteria, etc)?
- Yes No
6. If you answered yes to question 6 above, please attach a Material Safety Data Sheet (MSDS) for this application.
7. Please attach a copy of your menu to the application.

Section D- Authorized Representative Statement:

I hereby certify that the above information is accurate. I acknowledge that changes in cooking methods, volumes, and hours of operation will require re-application and possible increase in the size or type of grease interceptor. I certify the grease interceptor(s) will be cleaned in accordance with manufacturers' specifications a minimum of once per week or more frequently if required by the permit. I certify that all staff will use best management practices as pertains to disposal and handling of grease, fats, and oils. I acknowledge that the required cleaning frequency can be increased at any time by Winchester Municipal Utilities.

Signature _____ Date _____
 Printed _____

Please include \$25 application fee (payable to WMU) with application and mail to:

Winchester Municipal Utilities
 Attn: FOG Control Coordinator
 P.O. Box 4177
 150 North Main Street
 Winchester, KY 40392-4177

For questions or concerns, please contact the Pretreatment Coordinator at (859) 744-5434.

APPENDIX C – EXAMPLE FOG CONTROL PERMIT



**Winchester Municipal Utilities (WMU)
FOG Control Permit for Food Service Establishments**

Permit number: XXXX

Effective Date: XXXXXXXX

Expiration Date: XXXXXXXX

Annual Renewal with Paid Permit Fee

In accordance with the provisions of Winchester City County Code, Chapter 5 and any applicable provisions of Federal and/or State law or regulation, permission is hereby granted to:

XXXXXXXXXXXXXXXXXX

XXXXXXXXXXXXXXXXXX

Winchester, KY XXXXX

Contact: XXXXXXXXXXXX

Phone: (859) XXX-XXXX

to discharge wastewater to the sewer system from the above facility into WMU sanitary sewers. This permit is granted in accordance with the "FOG Control Permit Application" filed on XXXXX and in conformity with plans, specifications, and other data submitted, all of which are filed with and considered as part of this permit. Failure to abide by the terms and conditions of this permit shall constitute a violation pursuant to WMU ordinances and will result in appropriate enforcement action. This permit will renew with the payment of the permit fee, provided compliance has been maintained.

Part I – Definitions:

1. Best Management Practices (BMPs) – practices intended to reduce the quantity of FOG discharged to grease interceptors and the sewer during food handling operations.
2. Fats, oils, and grease (FOG) – any substance such as a vegetable or animal product that is used in, or is a by product of, the cooking or food preparation process, and that turns viscous or solidifies with a change in temperature or other conditions. All are sometimes referred to herein as "grease" or "greases."
3. Garbage grinder – a device which shreds or grinds up solid or semisolid waste materials into smaller portions for discharge into the sanitary sewer collection system.
4. Grease interceptor – a device designed and installed so as to separate and retain deleterious, hazardous, or undesirable matter from normal wastes for a controlled disposal while permitting normal sewage or liquid wastes to discharge into the drainage system by gravity. Grease traps are herein referred to as "grease interceptors".

Part II - Permit Conditions:

1. Grease Interceptor Requirements:
 - a. Permittee is required to install, operate, and maintain an approved type and adequately sized grease interceptor necessary to maintain compliance with this permit. The grease interceptor shall be adequate to separate and remove FOG contained in wastewater discharges from the permittee's facility prior to discharge to the WMU sewer system.
 - b. The size, type, and location of each interceptor and of each separator shall be designed and installed in accordance with the manufacturer's instructions and based on the anticipated conditions of use. A grease interceptor shall be required

to receive the drainage from fixtures and equipment with grease-laden waste located in food preparation areas.

- c. It is prohibited for facilities to have grease interceptors that malfunction due to structural failure. For example, a collapsed or deteriorated baffle wall, leaks, infiltration and inflow, improper or missing tees, and other deficiencies that will prevent the grease interceptor from working properly, constitute prohibited malfunctions.

2. Discharge Restrictions:

- a. Introduction of any additives into the permittee's wastewater system for the purpose of emulsifying or biologically/chemically treating FOG for grease remediation or as a supplement to interceptor maintenance, unless a specific written authorization from WMU is obtained.
- b. Disposal of waste cooking oil into drainage pipes. All waste cooking oils shall be collected and stored properly in receptacles such as barrels or drums for recycling or other acceptable methods of disposal.
- c. Discharge of wastewater with temperatures in excess of 140°F to any grease control device, including grease interceptors.
- d. The use of a garbage grinder is discouraged but in the event that the device is used, it must be connected to an appropriately sized grease interceptor.
- e. A commercial dishwasher must be connected to an external grease interceptor.

3. Best Management Practices:

Permittee shall implement Best Management Practices (BMPs) in its operation to minimize the discharge of FOG to the sewer system. The permittee shall follow BMPs for handling and disposal of fats, oils and grease, including but not limited to:

- a. Segregation and collection of waste cooking oil.
- b. Scraping of food scraps into garbage prior to washing.
- c. Pre-rinsing of all plates, dishes, bowls, etc. before loading into dishwasher.
- d. Kitchen signage. Best management and waste minimization practices shall be posted conspicuously in the food preparation and dishwashing areas at all times.
- e. Employee training. Employees of the permittee shall be trained on the following subjects:
 - How to dry wipe pots, pans, cookware and work areas before washing to remove grease.
 - How to properly dispose of food waste and solids in enclosed plastic bags prior to disposal in trash bins or containers to prevent leaking and odors.
 - The location and use of absorption products to clean under fryer baskets and other location where grease may be spilled or dripped.
 - How to properly dispose of grease or oils from cooking equipment into a grease receptacle such as barrel or drum without spilling.

4. Operation and Maintenance of Grease Interceptors:

All discharges containing grease must pass through a grease interceptor before entering the sanitary sewers. Grease interceptors shall be maintained by periodic removal of the full content of the interceptor which includes wastewater, accumulated FOG, floating materials, sludge, and solids. External grease interceptors shall fully pump out its contents at a minimum of every six months. Internal grease interceptors shall be cleaned once weekly. Based on the actual generator of FOG from the facility, the maintenance frequency may increase or decrease; however, the minimum pumping frequency is at least once every six months. The Permittee shall inspect interceptor to ensure proper and efficient operation.

Part III – Record Keeping and Notification Conditions:

5. Record Keeping:

A maintenance log shall be kept of interceptor maintenance and cleaning and shall contain all maintenance forms from the previous 36 months. The log shall include the date of the maintenance, the initials of the person cleaning, and an estimation of the amount of grease removed. The log shall be maintained onsite and be available to inspectors of WMU.

6. Notification Requirements:

Permittee shall notify WMU at least 60 days in advance of any facility expansion/remodeling, or process modifications that may result in new or substantially increased FOG discharges or a change in the nature of the discharge. Permittee shall notify WMU in writing of the proposed expansion/remodeling or process modifications and shall submit any information requested by WMU for evaluation of the effect of such expansion on Permittee's FOG discharge to the sewer system.

Part IV – Standard Conditions:

7. Liability for damage to Sewers:

This permit does not relieve the FSE of financial liability for the cost of sewer line cleaning by WMU or any damage to the sanitary sewer system that can be attributed to the FSE.

8. Permit Modification:

WMU may change the restrictions or conditions of this permit from time to time as circumstances may require. WMU shall allow the permittee a reasonable period of time to comply with any changes in this permit required by WMU.

9. Permit Termination:

WMU may revoke this permit upon a finding that the FSE has violated any of its provisions or upon finding of any of the following:

- a. Failure to factually report the operations of the FSE which affect the wastewater discharged into the sewerage system of WMU;
- b. Failure of the facility to report significant changes in its operations;
- c. Refusal of reasonable access to the facility's premises for the purpose of inspection or monitoring by a representative of the WMU;
- d. Fees are not paid within (60) days of issue;
- e. State, Federal and/or WMU rules and regulations change to become more restrictive;

10. Permit Suspension:

WMU may suspend this Permit when such suspension is necessary in order to stop a discharge which presents an imminent hazard to the public health, safety or welfare, to the local environment or to WMU's sewerage system.

11. Penalties for Violations of Permit Conditions:

Section 14-212 of the City of Winchester Ordinances provides that any person who violates a permit condition shall be served by WMU with written notice stating the nature of the violation and providing a reasonable time limit for the satisfactory correction thereof. The offender shall, within the period of time stated in such notice, permanently cease all violations. Any FSE who shall continue any violation beyond the time limit provided shall be subject to civil and/or criminal liability as provided in the Winchester Code of Ordinances.

12. Bypass of Treatment Prohibited:

No FSE shall cause or contribute to bypass of the grease interceptor by physical or chemical means including bacterial enzymes which breakdown fats, oils and grease, degreasers, excessively hot waters, removal of internal baffles or any other means which will prevent the proper operations of the grease interceptor and/or WMU's collection system.

13. Non-transferability of Permit:

This permit is issued specifically to the FSE and facility location specified in this permit. This permit is issued for a specific user, for a specific operation at a specific location, and creates no vested rights. Any permit that is transferred to a new owner and/or operator or to a new facility is void. Permittee shall notify WMU in writing prior to the transfer of ownership and shall give a copy of the existing permit to the new owner or operator.

14. Access Requirements:

Access to the permittee's facility shall be granted to WMU's personnel and/or its designee to all parts of the facility for the purpose of conducting compliance inspection during all times the facility is open, operating, or any other reasonable time. WMU may conduct random, unannounced inspections to verify compliance with the terms and conditions of this permit.

15. Severability:

The provisions of this permit are severable. If any provision of those permits limitations and/or requirements, or the application thereof, to the permittee is held invalid, the remainder of the permit limits and/or requirements shall remain in full force and effect.

Part V – Site Map:

Note - Site map will be developed for each permit

APPENDIX D – COMPLIANCE INSPECTION FORM AND PROTOCOL



**Winchester Municipal Utilities (WMU)
INSPECTION FORM**

Facility FOG Control Inspection Form

- 1. Facility Name: _____
Facility Location: _____
- 2. Contact Person: _____ Phone: _____
- 3. Date / Time: _____
- 4. Restaurant Description: _____

Interceptor Information:

- 5. Does this facility have a grease interceptor? Yes No
- 6. Type of Grease Interceptor Under Sink GI Flow rate/Capacity _____
 External GI Volume _____
 Other _____ GI Volume _____
- 7. Does the grease interceptor comply with WMU sizing requirements? Yes No
- 8. Are all grease-laden sources plumbed to the grease interceptor? Yes No

Interceptor Maintenance:

- 9. Is the grease interceptor cleaned and maintained regularly?: Yes No
Maintenance frequency Daily Weekly Monthly Other _____
- 10. Grease interceptor cleaning performed by: _____
- 11. Is grease interceptor cleaning documented in a maintenance log? Yes No
- 12. Are the conditions of the FOG Control Permit being met? Yes No _____

Interceptor Inspection:

- 13. Estimate current grease level. _____
- 14. Is the interceptor easily accessible? _____

Best Management Practices Implementation:

- 15. Are BMP signs posted? _____
- 16. Are BMPs being followed? (Observe employee practices) _____

Compliance Status:

- 17. Date of Last inspection. _____: Facility in Compliance on prior inspection? Yes No
- 18. Reviewed Service Call History? Yes No
- 19. Condition of Downstream Sewer Lines. _____
- 20. Notice of Noncompliance Issued? Yes No
Reason: _____

Comments: _____

Inspector Signature _____ **Date** _____

FSE Signature _____ **Date** _____

WMU Compliance Inspection Protocol

The WMU inspector will need to follow the following protocol during inspections of a FSE.

Preparation:

- Obtain sewer system map
- Review FSE permit
- Review previous inspections
- Obtain paperwork and handouts
- Obtain camera and charged batteries
- Obtain Compliance Inspection form
- Review overflow and service call lists

External Grease Interceptors:

1. Inspect downstream manholes for grease buildup
2. Inspect grease interceptor level of grease and verify that the trap is functional
3. Obtain pumping records to verify pumping, determine frequency of pumping, and determine which company is performing the service
4. Educate on importance of compliance and results of non-compliance
5. Compliance/Enforcement
 - No records of pumping: Issue NOV and reschedule inspection to verify compliance. If the facility's representatives say that records are maintained at their main office, give them a completed "Records Non-Compliance" form, which allows 7 days to submit pumping records. If records are not received in 7 days, issue an NOV. Schedule follow-up inspection to confirm compliance.
 - Grease buildup in downstream manhole: Photograph manhole, evaluate pumping frequency, and ask that the frequency be increased. Follow up with an NOV and require that pumping frequency be increased. Re-inspect within 90 days to look for further grease buildup and to verify that pumping frequency has been increased.
 - Grease interceptor is not functional: Issue NOV and require interceptor be repaired within a reasonable amount of time.

Internal Grease Interceptors:

1. Inspect downstream manholes for grease buildup.
2. Ask to see grease interceptor maintenance log.
3. Open or have staff open the grease interceptor to verify cleaning activities and functionality.
4. Observe Best Management Practices, if possible.
5. Educate on importance of compliance and results of non-compliance.
6. Compliance/Enforcement
 - No Records of cleaning: Issue NOV and schedule re-inspection in 30-60 days
 - Grease buildup in downstream manhole: Photograph the manhole, evaluate the cleaning frequency, and ask that the frequency be increased. Follow up with an NOV. If facility is cleaning as permit requires rewrite permit to require increased cleaning frequency. Re-inspect within 90 days to look for further grease buildup and to verify that cleaning frequency has been increased.
 - Grease interceptor is not functional: Issue NOV and require interceptor be repaired within 10-15 days.

Grease in Downstream Manhole:

- Trace upstream to confirm source of grease.
- Request pumping/cleaning frequency be increased and follow up with a warning or NOV.
- If the facility has a special permit, rewrite the permit to require increased cleaning.
- Look for other sources of grease not plumbed to the grease interceptor.
- Ask that the manager inspect the grease trap after cleanings or pumpings to verify proper cleaning.
- If grease is excessive ask sewer line maintenance to clean it to avoid a blockage and overflow.

APPENDIX E – WMU FOG CONTROL PROGRAM ENFORCEMENT RESPONSE GUIDE



**FATS, OILS, AND GREASE (FOG) CONTROL PROGRAM
ENFORCEMENT RESPONSE GUIDE**

Unauthorized Discharges

Noncompliance	Nature of Violation	Enforcement Response	Personnel
Unpermitted Discharge	FSE unaware of requirement; no harm to POTW/environment	Phone call; NOV with application form	FC
	FSE unaware of requirement; harm to POTW	- AO and/or civil penalty - Civil action	FC GM
	Failure to comply continues after notice by POTW	- Civil action - Terminate service	GM GM
Unpermitted Discharge (failure to pay permit fee)	FSE does not submit payment of permit fee within 10 days of due date	- Phone call - Notification letter	FC FC
	FSE does not submit payment within 30 days of due date	NOV	FC
	FSE does not submit payment within 60 days of due date	- Civil action - Terminate Service	GM GM



Grease Control Equipment

Noncompliance	Nature of Violation	Enforcement Response	Personnel
Failure to install grease interceptor which meets WMU guidelines for grease design and installation	No grease interceptor; Inadequate/improper grease interceptor design and/or installation	NOV	FC
Grease interceptor structural failure	Failure or malfunction of components (baffle, walls, tees, etc.)	NOV	FC
	No or impeded access to structure and/or cleanout openings	NOV	FC
Inadequate maintenance	Failure to perform scheduled and/or required cleaning/pumping	NOV	FC



Monitoring and Reporting Violations

Noncompliance	Nature of Violation	Enforcement Response	Personnel
Interceptor pumping records not maintained	Failure to maintain proper pumping records onsite for a min of 36 months from previous inspection	NOV	FC
Failure to report upgrades/changes to existing facilities to WMU	Failure to report additions/changes to FSE that impact grease discharge to POTW (seating capacity increase, operating hours increased, addition of cooking equipment using grease, additional fixtures, menu changes, etc.)	NOV	FC
Failure to report improper operation or failure of grease control equipment	Failure to notify WMU of improper operation or failure of grease interceptor that contributes to the temporary or permanent loss of grease control	NOV	FC
Compliance Schedules (in permit)	Missed milestone by less than 30 days, or will not affect final milestone	Phone Call	FC
	Missed milestone by more than 30 days, or will affect final milestone	NOV	FC



	(good cause for delay)		
	Missed milestone by more than 30 days, or will affect final milestone (no good cause for delay)	- Show cause order - Civil action - Terminate service	FC, GM GM GM
	Recurring violation or violation of schedule in AO	- Civil action - Terminate service	GM GM

Violations Detected During Site Visits

Noncompliance	Nature of Violation	Enforcement Response	Personnel
Entry Denial	Entry denial or consent withdrawn; copies of records denied	Show cause order; terminate service	FC
Inadequate FSE employee training and/or recordkeeping	Failure to train FSE employees in proper grease handling and disposal practices	NOV	FC
	Failure to maintain onsite sufficient documentation of the administration of such training	NOV	FC
Inadequate Recordkeeping	Inspector finds files incomplete or missing (no evidence of intent)	NOV	FC
	Recurring	AO; civil penalty	FC



Time Frames for Responses

- A. All violations will be identified and documented within five days of receiving compliance information.
- B. Initial enforcement responses involving contact with the FSE and requesting information on corrective or preventative action(s) will occur within 15 days of issuance of NOV.
- C. Follow-up actions for continuing or recurring violations will be taken within 60 days of the initial enforcement response. For all continuing violations, the response will include a compliance schedule.
- D. Violations that threaten health, property, or the environment are considered emergencies and will receive immediate responses such as halting the discharge or terminating service.
- E. All violations meeting the criteria for significant violations will be addressed with an enforceable order within 30 days of the identification of significant violations.

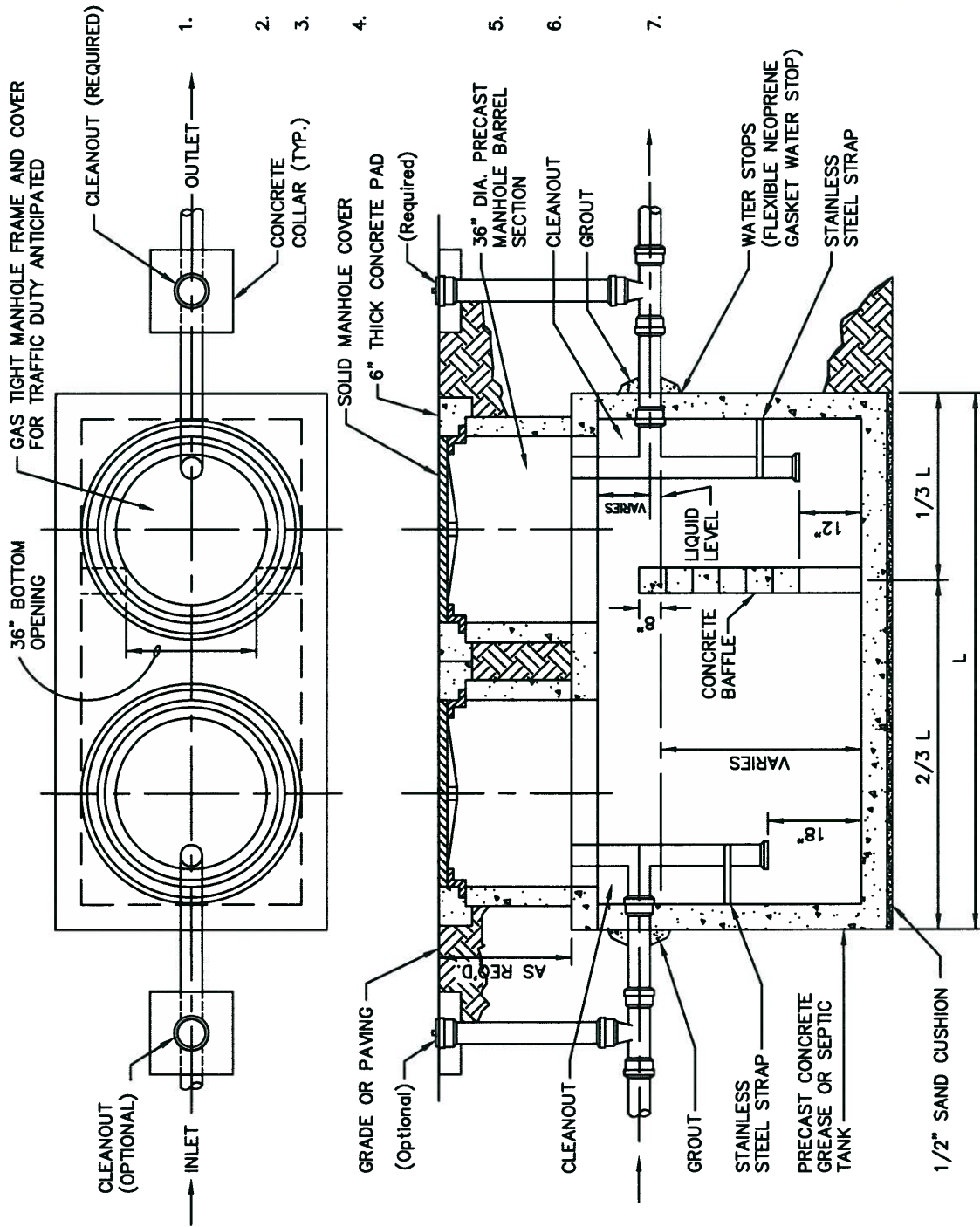
Note: In addition to all of the foregoing, any violator will be subject to Division 10 of the code ordinances of the City of Winchester.



**Abbreviations and Glossary of Terms
For ERP**

IUs	<u>Industrial Users</u>	- all industrial contributors of wastewater to the publicly owned treatment works
NOV	<u>Notice of Violation</u>	- a written notice to the IU that a violation of the pretreatment program regulations has been detected
FC	<u>FOG Control Coordinator</u>	- designated employee of control authority (POTW) that oversees the pretreatment program
POTW	<u>Publicly Owned Treatment Works</u>	- the municipal treatment plant and corresponding sewer system; the local control authority
AO	<u>Administrative Order</u>	- an issued order by the POTW to place the IU on an enforceable schedule to comply with the pretreatment standard. It could include interim limits.
GM	<u>General Manager</u>	- designated employee of the POTW that manages the control authority (POTW)
	<u>Civil Action</u>	- legal action taken by the POTW's counsel asking the court to order an IU to take specific action
	<u>Show cause order</u>	- a called meeting by the POTW with the IU to present the facts and ask the IU to show the cause of the violation
	<u>Civil Penalty</u>	- legal action taken by the POTW's counsel asking the courts to stipulate penalties for specific actions
	<u>Terminate Service</u>	- deny IU sewer services

APPENDIX F – GREASE INTERCEPTOR STANDARD DRAWING



GENERAL NOTES:

1. THIS STRUCTURE IS TO BE ACCESSIBLE FOR MAINTENANCE OR INSPECTION WITH COVERS AND CLEANOUTS BROUGHT TO GRADE.
2. DESIGN CRITERIA SHALL BE HS-20 LOADING.
3. FLOW TO THE INTERCEPTOR SHALL EXCLUDE SANITARY SEWAGE AND SURFACE DRAINAGE.
4. DESIGN AND CAPACITY OF GREASE INTERCEPTOR TO BE CERTIFIED BY ENGINEER IN ACCORDANCE WITH KENTUCKY STATE PLUMBING CODE AND REVIEWED FOR CAPACITY BY WMU PRIOR TO CONSTRUCTION.
5. MULTIPLE COMPARTMENT INTERCEPTORS ARE ACCEPTABLE.
6. PIPE CLEANOUT TEE SHALL BE THE SAME SIZE AS THE PIPE AND BE WITHIN 6' OF THE GREASE INTERCEPTOR ON THE OUTLET LINE. THE INLET LINE CLEANOUT LINE IS OPTIONAL.
7. MANUFACTURER WILL PROVIDE GREASE TRAP WITH TWO (2) ACCESS POINTS AS SHOWN. PLUMBING CONTRACTOR TO INSTALL FIXTURES..

NO.	DATE	REVISION DESCRIPTION	BY

JULY 16, 2009

GREASE
INTERCEPTOR
STANDARD
DRAWING



APPENDIX G – GREASE INTERCEPTOR CLEANING AND MAINTENANCE FORM

APPENDIX H – CONSTRUCTION INSPECTION FORM AND PROTOCOL



**Winchester
Municipal
Utilities**

SANITARY SEWER LATERAL/GREASE TRAP INSPECTION

ADDRESS: _____ PERMIT NUMBER _____

CONTRACTOR: _____

INSPECTION DATE: _____ TIME: _____

LATERAL INSPECTION

Compliant	Non-compliant	N/A	
			Lateral has been properly backfilled
			Lateral meets requirements for proper fall
			Lateral connection to tap has been properly completed
			Lateral has been connected to tap at proper location
			Required clean-outs have been installed

GREASE INTERCEPTOR INSPECTION

Compliant	Non-compliant	N/A	
			Grease interceptor meets WMU standards
			Required access has been provided
			Required clean-outs have been installed
			Grease interceptor installed at location shown on site plan

COMMENTS:

<input type="checkbox"/> Passed - Date: _____	<input type="checkbox"/> Failed - Date: _____	Signature: _____
--	--	-------------------------

WMU Interceptor Construction Inspection Protocol

All grease interceptors must be inspected after installation. The inspection will verify that all connections have been properly sealed and that the grease interceptor complies with WMU standards.

After an inspection is completed, the inspector will complete an inspection report and inform the contractor if the installation does not pass inspection due to non-compliance with the State Plumbing Code or WMU requirements.

When an installation passes inspection, the inspector will enter an inspection date for the property in the database system and attach a copy of the inspection report to the permit.

There is no fee associated with a grease interceptor permit for an external interceptor. The permit serves as verification that the owner has complied with the ordinance requiring a grease interceptor and can be used by WMU to compile information on grease interceptor installations.

APPENDIX I – FSE EDUCATIONAL MATERIALS

NO
Fats, Oils,
or Grease



in sinks or drains



Don't create SEWER PROBLEMS



Winchester
Municipal
Utilities

for your facility! ALWAYS NEVER

- ✓ Scrape food scraps into trash or recycling bin before rinsing, washing, or placing in dishwasher.
- ✓ Put all solid and liquid food, including dairy products, batters, and gravy, into trash or recycling bin.
- ✓ Collect and empty grill scrapings and fryer grease in a grease recycling container.
- ✓ Place strainers in sinks to catch food and dispose of this food in the trash or recycling bin.
- ✓ Clean grease interceptor regularly.
- ✓ Follow proper grease interceptor cleaning procedures .

- X Don't pour grease into sinks, toilets, external drains, or storm sewers; it will clog the pipes!
- X Don't run hot water to flush FOG down the pipes. It will harden eventually and cause problems.
- X Don't use the sink to clean an internal grease interceptor. This will discharge grease into the sewer system. Instead, follow proper instructions for cleaning the grease trap.
- X Don't rely on de-greasing detergents to break down fats, oils, and grease in your pipes. These can move grease through the pipes to cause problems in other areas.

APPENDIX J – PUBLIC EDUCATION MATERIALS

<DATE>

Re: Grease Blockages in Your Sewers

Dear Customer:

WMU recently had a grease-related sewer overflow in your area. We are sending this letter to ask for your help in preventing future overflows by disposing of cooking grease properly.

If you pour grease down your drains, it may build up, block your pipes, and cause rancid odors or messy, costly sewage backups in your home. It can also clog WMU's sewer lines and cause overflows, which are a potential threat to our environment.

When washed down the drain, grease from meat fats, fryer grease, lard, butter, oil, food scraps, baking goods, sauces, and dairy products can plug sanitary sewer lines. By properly disposing of these items, you can help prevent costly sewage backups and overflows. The following are disposal tips that you can use:

- Instead of pouring grease or cooking oil down the sink drain or into the toilet, place it in a cup or storage container and then dispose of it in the trash
- Make sure all plates and pans are free of food scraps
- Use dry paper towels to remove any excess grease before rinsing
- Do not pour liquid foods (dairy products, syrups, batters, gravy, etc.) down the drain

If you have any questions about what is causing the problem or what you can do to help, please do not hesitate to contact:

Winchester Municipal Utilities
FOG Control Coordinator
P.O. Box 4177
Winchester, KY 40392-4177

Sincerely,

Winchester Municipal Utilities



GREASE FACT SHEET

Residents can help prevent pipe blockages and sewer overflows by keeping grease out of the sewer system. Sewer backups can cause damage to homes and health hazards, and can threaten the environment. Sewer pipes blocked by grease are an increasingly common cause of overflows.

Where does grease come from?

Fats, Oils, and Grease are a normal consequence of cooking and occur naturally in many foods. Grease is the common term for animal fats and vegetable oils. It can be found in such items as:

- Meat fats
- Lard
- Butter and margarine
- Cooking oil
- Shortening
- Food scraps
- Baking goods

What are the grease issues?

Grease is frequently poured down the sink drain. It may not appear to be harmful, but as the warm liquid cools, the grease solidifies, becoming a hardened mass and causing buildup inside the pipes. The buildup restricts the flow of sewage and clogs the pipes.

The complications can be:

- Raw sewage backing up into your home.
- Increased calls for a plumber.
- An unpleasant and expensive cleanup at your expense.
- Raw sewage overflowing into

parks, yards and streets.

- Potential contact with disease-causing organisms.
- Increased cost for local sewer departments, which causes higher sewer bills for customers

Here's what you can do:

- Never pour grease down the sink or into the toilet.
- Scrape grease and food scraps into a disposable container or place in a trash can (after cooling).
- Do not put food scraps down the garbage disposal. These units only shred solid material into smaller pieces and will not prevent grease from going down the drain.
- Use a strainer in the sink to catch food scraps and other solids.



Contact Us

Winchester Municipal Utilities
P.O. Box 4177
150 North Main Street
Winchester, KY 40392-4177
Attn: Pretreatment Coordinator
(859) 744-5434