



FATS, OILS, AND GREASE (FOG) CONTROL ACTION PLAN

March 2010
Revised: June 2010

Program Background

The City of Stockton (City) has developed a comprehensive program to address sanitary sewer overflows associated with fats, oils, and grease (FOG). This FOG Control Action Plan (FCAP) outlines the elements of the City's FOG Control Program. The program consists of inspections, enforcement procedures, public education and public outreach to all Food Service Establishments (FSEs) in the City's regional sewer service area. The FOG Control Program is operated by the Pretreatment section of the Municipal Utilities Department. The program is implemented by the Technical Services Supervisor (FOG Program Manager) and consists of two full-time Environmental Control Officers (FOG Inspectors). More than 900 FSEs are inspected annually under this program.

Program Elements

The following FOG Program elements are outlined below:

- Source Identification
- Legal Authority
- Inspections and Monitoring
- Enforcement
- Public Education and Outreach
- Budget and Staffing
- Effectiveness Measures

Source Identification

Discharges from FSEs are potential sources for grease related sanitary sewer blockages and overflows in the sewer collection system. FSEs include restaurants, retail markets, institutions, schools, licensed health care facilities, city owned facilities, flea markets and commissaries. Currently, there are approximately 950 potential FSEs identified within the City's regional wastewater service area.

The following list includes a number of resources used by the City of Stockton for identifying new FSEs:

- San Joaquin County Public Health Department food vendor permit

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database

- City of Stockton business license database
- City of Stockton building permit database
- Telephone listings
- Restaurant directories
- City of Stockton department directories
- Observations by City personnel through sampling, surveillance, inspections and site visits
- Referrals from other agencies
- Citizen reports
- Contact from potential restaurants
- Newspaper, trade journal, and business magazine articles

The San Joaquin County Public Health Department's food vendor permit database contains information on potentially all facilities in San Joaquin County which serve food items to the public. This is a comprehensive list that is updated on a regular basis. This list will be utilized as the City's primary source for FSE identification. The additional resources listed above will be used to identify additional FSEs within the City's sewer service area which are not included in the County's database.

Appendix A: Food Service Establishment Database - March 2010

Legal Authority

City of Stockton Municipal Code Chapter 13.40 (FOG Ordinance) provides legal authority for the City to implement the FOG Control Program. The ordinance prohibits discharges that cause or threaten to cause obstruction of flow in sewers, contains authority to require pretreatment prior to discharge to the sewer, contains authority to inspect dischargers and sample discharges, and provides for enforcement and penalties for non-compliance.

The FOG Ordinance is applicable to commercial and institutional generators of FOG discharges. Residential customers and industrial facilities are not regulated under this ordinance. The City will continue to use public outreach to educate customers and reduce FOG from residential discharges. Industrial facilities are regulated under the City's Industrial Pretreatment Program Ordinance (SMC Chapter 13.08).

Inspections and Monitoring

All FSEs are inspected at least annually to determine compliance with FOG Ordinance regulations and to provide public education and outreach.

The City currently is staffed with two full-time FOG inspectors who will be able to perform approximately 18-20 initial FSE inspections per week with additional time available for follow-up inspections and related FOG enforcement activities. In addition, due to the expected heavy volume of follow-up inspections and initial enforcement actions during the first year of inspections, the City has two full-time Environmental Control Officers, one full-time Senior Environmental Control Officer and one full-time Technical Services

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Supervisor to assist with FOG duties if necessary. Formal FOG inspections are scheduled to begin 60 days following acceptance of the FCAP by CSPA and will be scheduled to occur on a daily basis throughout the year.

Inspection procedures include:

- Determination of compliance with FOG Ordinance requirements.
- Determination of grease interceptor condition, operation and maintenance.
- Measurement of grease interceptor grease and solids content.
- Evaluation of Kitchen Best Management Practices (BMPs).
- Review of all FOG control related records and documents.
- Distribution and discussion of educational and outreach materials.
- Review and evaluation of any prior FOG control deficiencies.
- Follow-up inspections at all FSEs with deficiencies are conducted within 30 days of the original inspection.
- Second follow-up inspections if the deficiency was not remedied by the time of the first re-inspection are performed within 15 days of the initial re-inspection. Continuing re-inspections are performed as necessary.
- Inspections of all FSEs suspected of causing or contributing to an SSO are performed within 5 working days of the occurrence of the SSO.
- All new or substantially remodeled FSEs are inspected within 90 days of start-up or remodel completion.

Appendix B: FSE Inspection Form

Enforcement

The City has implemented a FOG Enforcement Response Plan (ERP) to establish general responsibilities for enforcement of the FOG Ordinance. The ERP is an effective way to ensure that the City of Stockton takes fair, consistent and equitable enforcement actions against FSEs for violations of the FOG Ordinance. It is the intention of the Municipal Utilities Department to move quickly and responsibly in all enforcement actions.

Appendix C: FOG Enforcement Response Plan (DRAFT) - June 2010.

Public Education and Outreach

Public education and outreach that promotes proper handling and disposal of FOG is an ongoing effort throughout Stockton. The City has developed various sources and communication methods necessary to address the education and outreach issues, including:

General Public Outreach Program- The Municipal Utilities Department has a public relations campaign to inform the public of proper FOG disposal. Residential public outreach is conducted a minimum of twice per year.

Methods for public outreach include:

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- Print media promoting residential best management practices regarding proper disposal of FOG:

Articles/advertisements in Stockton's major newspaper, The Record, which has a daily distribution of 55,000.

Inserts for City of Stockton and California Water Service Company utility billing, with distribution rates of 46,000 and 40,000 respectively. The City plans to utilize these utility billing inserts in November and December each year to capture public awareness during the holiday season when residential FOG discharges tend to be more significant.

- Television media promoting residential best management practices regarding proper disposal of FOG:

Comcast Channel 97 public service announcements, with a subscriber rate of 50,000.

City of Stockton Website- contains useful FOG information for businesses and residential customers- www.stocktongov.com/mud.

Restaurant FOG Inspection Program- Stockton provides education and outreach materials to all FSEs in conjunction with the FOG inspection program. FSEs receive these documents at the time of each annual inspection. The FOG inspectors make an effort to discuss this material with FSE managers and owners and to answer all questions that arise. Initially, all identified FSEs (listed in Appendix A) were mailed detailed FOG education and outreach information in November 2009.

Budget and Staffing

The FOG Program is a component of the City of Stockton Pretreatment Program. The Pretreatment Program is funded through the Municipal Utilities Department Enterprise Fund, which is funded by sewer service-related fees, including FOG inspection and re-inspection fees established by Council resolution.

The FOG Program presently supports a staff of approximately 3.0 full-time equivalent (FTE) employees:

- FOG Inspectors (Environmental Control Officers): 2.0 FTE
- Senior Environmental Control Officer: 0.25 FTE (more if necessary)
- FOG Program Manager (Technical Services Supervisor): 0.50 FTE (more if necessary)
- Permit Center Representative: 0.10 FTE
- Clerical Support: 0.25 FTE

In addition, the City's Pretreatment Program presently supports a staff of two Environmental Control Officers which will be available to assist with FOG inspection and enforcement duties if necessary:

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Effectiveness Measures

FCAP effectiveness is reviewed and analyzed, at minimum, on an annual basis and is reported with each annual report. Effectiveness measures include:

FSE record of compliance with SMC regulations as determined by annual inspection reports.

Evaluation of FOG caused SSOs from data obtained through video inspection (CCTV) of sanitary sewers as specified in Section X of the Consent Decree and procedures specified in the City's "SSO Cause Determination SOP" dated December 31, 2009.

Schedule for Implementation

Program Element	Estimated Completion Date
Source Identification	Initial FSE identification completed in November 2009. Updated continuously throughout the year. Major update performed minimum once per year.
Legal Authority	FOG Ordinance (SMC 13.40) adopted by City Council on January 26, 2010, effective date February 25, 2010.
Inspections and Monitoring	Informal grease interceptor inspection program began in September 2009 and is continuing on an interim basis until FCAP is accepted by CSPA. Formal FSE inspection program scheduled to start 60 days following acceptance of FCAP by CSPA.
Enforcement	Legal authority established with adoption of SMC 13.40 (FOG Ordinance). Enforcement Response Plan developed in March 2010 and revised in June 2010.
Public Education and Outreach	Initial FSE outreach completed in November 2009. Ongoing FSE outreach conducted with each annual inspection visit and as needed. Residential public outreach conducted a minimum of twice per year.
Budget and Staffing	Budget established. Revenue through inspection fees effective July 1, 2009. Staffing currently in place.

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Program Element	Estimated Completion Date
Effectiveness Measures	Evaluated at least annually. Reported with each annual report beginning in 2010.

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