



Operational Division Policy No. 2011 - 01

Princeton Water and Wastewater Commission Fats, Oils & Grease (FOG) Management Policy

Scope & Purpose:

To prevent sanitary and combined sewer system blockages, obstructions and overflows within the sewer and wastewater system of the City of Princeton, Kentucky (“City”) due to the contribution and accumulation of fats, oils and grease from food service establishments, commercial facilities and industrial facilities.

Contents:	page
I. Definitions	1
II. General Requirements	3
III. Approved Grease Waste Hauler List	5
IV. Grease Control Equipment Installation Requirements	7
V. Grease Interceptor Cleaning/Maintenance Requirements	9
VI. Grease Trap Sizing, Cleaning/Maintenance Requirements	10
VII. Accidental Discharge-Safeguards	11
VIII. “Additives” Prohibition	11
IX. Right of Entry-Inspection and Monitoring	11
X. Fee Option	11
XI. FOG Treatment, Disposal, & Resource Recovery Plan	11
XII. Enforcement Actions	12

I. Definitions:

1. Fats, Oils, & Grease (FOG): Organic polar compounds derived from animal and/or plant sources. FOG may be referred to as “grease” or “greases” in this Policy.
2. Food Service Establishment (FSE): Any establishment, business or facility engaged in preparing, serving or making food available for consumption. Single family residences are not a FSE, however, multi-residential facilities may be considered a FSE at the discretion of the Superintendent. Food Service Establishments will be classified as follows:

Class 1: Deli – engaged in the sale of cold cut and micro-waved sandwiches/subs with no frying or grilling on site, Ice Cream shops and beverage bars as defined by NAICS 72213, Mobile Food Vendors as defined by NAICS 722330

Class 2: Limited-Service Restaurants (e.g., fast food facilities) as defined by NAICS 722211 and Caterers as defined by NAICS 722320

Class 3: Full Service Restaurants as defined by NAICS 722110

Class 4: Buffet and Cafeteria Facilities as defined by NAICS 72212

Class 5: Institutions (Schools, Hospitals, Nursing Homes, Prisons, etc.) as defined by NAICS 722310 but not to exclude self-run operations.

3. (Brown) Grease: Fats, oils and grease that is discharged to the grease control equipment.
4. (Yellow) Grease: Fats, oils and grease that has not been in contact with or contaminated by other sources (water, wastewater, solid waste, etc.) and can be recycled.
5. Grease Control Equipment (GCE): A device for separating and retaining wastewater FOG prior to wastewater exiting the FSE and entering the City’s sewer and wastewater system. The GCE is constructed to separate, trap and hold fats, oils and grease substances, thus preventing such substances from entering the City’s sewer and wastewater system. Devices include grease interceptors, grease traps, or other devices approved by the Superintendent.
6. Grease Interceptor: Grease Control Equipment consisting of a large tank, usually 750 gallon to 2,000 gallon capacity, which provides FOG control for a FSE. Grease interceptors will be located outside the FSE, unless a variance request has been granted.
7. Grease Trap: Grease Control Equipment consisting of an “under the sink” trap, a small container with baffles, or a floor trap. For a FSE approved to install a grease trap, the minimum size requirement is the equivalent of a 20-gallon per minute/40 pound capacity trap. All grease traps will have a flow control restrictor and venting.
8. Grease Recycle Container: Container used for the storage of yellow grease.
9. NAICS: North American Industry Classification System. The website of NAICS may be found at: (<http://www.census.gov/epcd/www/naics.html>).
10. Series (Grease Interceptors Installed in Series): Grease interceptor tanks are installed one after another in a row and are connected by plumbing pipe.
11. Tee or T (Influent & Effluent): A T-shaped pipe extending from the ground surface below grade into the grease interceptor to a depth allowing recovery (discharge) of the water layer located under the layer of FOG. Influent & Effluent T’s are recommended to be made of PVC or equivalent material, and extend to within 12” to 15” of the bottom of the interceptor.
12. Black Water: Wastewater containing human waste, from sanitary fixtures such as toilets and urinals.

13. Gray Water: Refers to all other wastewater other than black water as defined in this section.
14. Princeton Water and Wastewater Commission (“Commission”): The Princeton Water and Wastewater Commission, which is responsible for the operation, maintenance, administration and oversight of the City’s sewer and wastewater system per City of Princeton, Kentucky Ordinance 2-11-83 (4).
15. Superintendent: The Superintendent of the Princeton Water and Wastewater Commission.

II. General Requirements:

1. All existing Food Service Establishments (FSEs) are required to have grease control equipment (GCE) installed, maintained and operating properly in accordance with this FOG Management Policy.
2. All FSEs will be required to maintain records of cleaning and maintenance of GCE. GCE maintenance records include, at a minimum, the date of cleaning/maintenance, company or person conducting the cleaning/maintenance, volume (in gallons) of grease wastewater removed and final disposal location. A grease waste hauler completed manifest, that includes all the minimum information mentioned above, will meet this requirement.
3. GCE maintenance records shall be maintained at the FSE premises and provided to the Commission and/or the Health Department upon request. The FSE shall maintain GCE maintenance records for three (3) years.
4. No FSE will discharge oil and grease in concentrations that exceed the Commission’s limit for oil and grease.
5. Owners of Commercial Property will be held responsible for wastewater discharges by tenants or occupants of such property.
6. **Grease Control Equipment Certification Requirement:**

All establishments with grease control equipment must have their grease interceptor or grease trap inspected and certified annually by a Commission “certified” grease waste hauler or plumber. If a grease interceptor or grease trap satisfies all of the certification requirements, then no further action is required. If a grease interceptor or grease trap fails to satisfy any of the certification requirements, then a corrective action response is required by the FSE owner per item 7 below. Certification forms [Grease Interceptor Certification (Form A) or Grease Trap Certification (Form B)] must be completed and signed by the grease waste hauler or plumber, as well as the FSE owner or authorized representative, and submitted to the Commission. The original certification form must be submitted to:

Princeton Water & Wastewater Commission
Attn: FOG Program
101 E. Market Street
Princeton, KY 42445

7. **Failure of a Grease Interceptor Certification, or Grease Trap Certification:** In the event of a failed Grease Interceptor Certification or Grease Trap Certification, the FSE owner or authorized representative is responsible for including detailed “Corrective Action Response” information on the Grease Interceptor Certification form or the Grease Trap Certification form that is submitted to the Commission. If necessary, additional pages may be attached to the certification form. At a minimum, the “Corrective Action Response” information must include the reason for the failed certification, what corrective action will be taken to correct the problem, and the date the corrective action will be completed.
8. FSEs shall observe Best Management Practices (BMPs) for controlling the discharge of FOG from their facility. Examples of BMPs include:
 - A. Recycle waste cooking oil; dispose in Grease Recycle Bin or Container. Do NOT pour any grease into sinks, floor drains or mop sinks.
 - B. Post “NO GREASE” signs above all kitchen sinks as a reminder to employees.
 - C. “Dry Wipe” and scrape into a trash container as much food particles and grease residue from pots, pans, and plates as possible.
 - D. Use Strainers in sink drains and floor drains to prevent large food particles and containers from going into the sewer line.
 - E. If an oil or grease spill occurs, clean up using “dry” oil absorbent material or use ice to make grease solidify. Scoop up and dispose into a trash container. Do NOT wash oil or grease into drains.
 - F. Dispose of food items in the trash. Food grinder use is discouraged due to build up of solids in the GCE which causes decreased efficiency and need to increase pumping frequency of the GCE.
 - G. Educate and train all employees on grease control and prevention of sewer pipe clogs and sewer overflows.
9. FSEs shall dispose of yellow grease in an approved container, or recycle container, and the contents shall not be discharged to any sanitary sewer line, storm water grate, drain or conveyance. Yellow grease, or oils or grease, poured or discharged into the FSE sewer lines or City’s sewer wastewater system is a violation of the City of Princeton Sewer Use Ordinance.
10. It shall be a violation of the City of Princeton Sewer Use Ordinance to push or flush the non-water portion of GCE into the public sewer.

III. Approved Grease Waste Haulers List

To ensure proper maintenance of grease control equipment and proper disposal of the FOG waste, the Commission will maintain an “Approved Grease Waste Haulers List”. Criteria for the grease waste hauler to be placed on the “Approved Grease Waste Haulers List” include, but are not limited to, the following:

- Submittal to the Commission of a completed “Waste Hauler Agreement” signed by an authorized representative of the waste hauler.
 - The Waste Hauler Agreement sets forth, *inter alia*, the reporting requirements of the waste hauler and requires that the waste hauler make certain records available to the Commission. Failure to comply with any of the provisions or terms of the Waste Hauler Agreement will result in removal of the grease waste hauler from the “Approved Grease Waste Haulers List” and/or enforcement action.
- Completion of the Commission’s Grease Control Equipment Certification Class, or proof of successful completion of a GCE certification class at another recognized POTW.

IV. Grease Control Equipment Installation Requirements

New Food Service Establishment, Upgrading of Existing Food Service Establishment or Change of Ownership of Existing Food Service Establishment Requirement: The initial opening of a FSE, upgrading of an existing FSE or change of ownership of an existing FSE will require the installation and maintenance of a grease interceptor. Food service establishments in one of these categories must submit a FOG plan to the Commission for approval. The FOG plan shall include identification of all cooking and food preparation equipment (i.e., fryers, grills, woks, etc.); the number and size of dishwashers, sinks, floor drains, and other plumbing fixtures; the type of FSE classification; the type of food to be prepared and/or served; and plans for the grease interceptor dimensions and location. The Commission will review the FOG plan submitted by the FSE. The FOG plan may be approved as submitted or may be approved subject to such revisions and modifications as the Commission determines in its discretion to be necessary for the proper protection of the City’s sewer and wastewater system.

New construction of FSEs shall have separate sanitary (restroom) and kitchen process lines. The kitchen process lines shall be plumbed to appropriately sized GCE. No sanitary wastewater or stormwater shall be plumbed to the GCE.

All of the FSE’s internal plumbing shall be constructed to separate sanitary (restroom) flow from kitchen process flow. Sanitary flow and kitchen process discharges shall be approved separately by the Commission and shall discharge from the building separately. The kitchen process line(s) shall be plumbed to appropriately sized GCE. Kitchen process lines and sanitary lines may combine prior to entering the public sewer; however, the lines cannot be combined until after the GCE. Existing FSEs shall meet this FOG Management Policy criterion.

NEW MULTI-UNIT FACILITIES: New strip malls or strip centers must have two separate sewer line connections at each unit within the strip mall or strip center. One sewer line will be for sanitary wastewater and one sewer line will be for the kitchen area, or potential kitchen area, of each unit. The kitchen area, or potential kitchen area, sewer line will be connected to floor drains in the specified

kitchen area, and will connect, or be able to connect, to other food service establishment kitchen fixtures, such as 3 compartment sink, 2 compartment sink, pre-rinse sink, mop sink and hand wash sink.

New multi-unit facility, or new “strip mall” facility, owners shall contact the Commission prior to conducting private plumbing work at the multi-unit facility site. Multi-unit facility owners, or their designated contractor, shall have plans for separate private wastewater lines for kitchen and sanitary wastewater for each “individual” unit. In addition, the plans shall identify “stub-out” locations to accommodate a minimum of a 1,000 gallon grease interceptor for each unit of the multi-unit facility. New multi-unit facility, or new “strip mall” facility, owners shall ensure that suitable physical property space and sewer gradient is available to accommodate the installation of an exterior, in-ground GI when determining the building location. Upon approval from the Superintendent, FSEs in a strip mall may share a grease interceptor.

An FSE located in a new multi-unit facility shall have a minimum of a 1,000 gallon grease interceptor installed, unless that FSE is identified as a Class 1 facility. Class 1 FSE facilities are exempt from the requirements to install grease interceptors. Sanitary wastewater, or Black Water, shall not be connected to GCE.

Variance to Grease Interceptor Installation: At the discretion of the Superintendent, some FSEs may receive a variance from the required installation of a grease interceptor.

Approval of Grease Control Equipment: All new FSEs and FSEs that are planning to upgrade their facilities must contact the Commission for final approval of the proposed grease control equipment. This will include onsite inspection of the grease control equipment by the Commission. Failure of the FSE to contact the Commission to conduct the inspection of the new GCE will result in an enforcement action against the FSE owner.

Grease Control Equipment Sizing:

Minimum acceptable size of grease control equipment for each FSE Classification will be as follows:

Class 1: Deli, Ice Cream shops, Beverage Bars, Mobil Food Vendors- 20gpm/40 pound Grease Trap

Class 2: Limited-Service Restaurants / Caterers -1,000 gallon Grease Interceptor

Class 3: Full Service Restaurants- 1,000 gallon Grease Interceptor

Class 4: Buffet and Cafeteria Facilities- 1,500 gallon Grease Interceptor

Class 5: Institutions (Schools, Hospitals, Nursing Homes, Prisons, etc.)- 2,000 gallon Grease Interceptor

To calculate the appropriate size GCE, the Commission will utilize a sizing formula that includes the kitchen fixture units. Example:

Fixture Units (total) x Facility type multiplier x 36 (retention time) = Size of Interceptor (gals.)

Should the size of the interceptor calculate to 499 gallons or less with the formula above: Size of interceptor (gals.) x 0.75 (max. cap. of sink) = Flow(gpm) x hours(work day) = Acceptable Flow rate with retention time.

The Commission will review GCE sizing information received from the FOG plan information or the FSE’s engineer, architect or contractor. The Commission will make a decision to approve, or require additional grease interceptor volume, based on the type of FSE, the number of fixture units, and additional calculations. Grease interceptor capacity should not exceed 2,000 gallons for each interceptor tank. In the event that the grease interceptor calculated capacity needs to exceed 2,000 gallons, the FSE shall install an additional interceptor of the appropriate size. If additional interceptors are required, they shall be installed in series.

Grease interceptors that are installed in series shall be installed in such a manner as to ensure positive flow between the tanks at all times. Therefore, tanks shall be installed so that the inlet invert of each successive tank shall be a minimum of 2 inches below the outlet invert of the preceding tank.

Grease Control Equipment Specifications

Grease Control Equipment must remove fats, oils, & grease at or below the Commission's limit of 100 mg/L. Failure to comply with this requirement shall result in an enforcement action in accordance with the Enforcement Response Plan.

Grease Interceptor Design and Installation

Piping Design

1. The inlet and outlet piping shall have 2-way cleanout tees installed.
2. The inlet piping shall enter the receiving chamber 2 1/2" above the invert of the outlet piping.
3. On the inlet pipe, inside the receiving chamber, a sanitary tee of the same size pipe in the vertical position with the top unplugged shall be provided as a turndown. To provide air circulation and to prevent "air lock", a pipe (nipple) installed in the top tee shall extend to a minimum of 6" clearance from the interceptor ceiling, but not less than the inlet pipe diameter. A pipe installed in the bottom of the tee shall extend to a point of 2/3 the depth of the tank. The inlet T should be made of Schedule 40 PVC or equivalent material. *See illustration.*
4. The outlet piping shall be no smaller than the inlet piping, but in no case smaller than 4" ID.
5. The outlet piping shall extend to 12" above the floor of the interceptor and shall be made of a non-collapsible material. Minimum requirement for outlet piping is Schedule 40 PVC.
6. The outlet piping shall contain a tee installed vertically with a pipe (nipple) installed in the top of the tee to extend to a minimum of 6" clearance from the interceptor ceiling, but not less than the pipe diameter, with the top open. Minimum requirement for the outlet tee is Schedule 40 PVC. *See illustration.*

Baffles

1. The grease interceptor shall have a non-flexing (i.e. Concrete, steel or other suitable material) baffle the full width of the interceptor, sealed to the walls and the floor, and extend from the floor to within 6" of the ceiling. The baffle shall have an inverted 90 degree sweep fitting at least equal in diameter size to the inlet piping, but in no case less than 6" ID. The bottom of the sweep shall be placed in the vertical position in the inlet compartment 12" above the floor. The sweep shall rise to the horizontal portion, which shall extend through the baffle into the outlet compartment. The baffle wall shall be sealed to the sweep. *See illustration.*
2. The inlet compartment shall be 2/3 of the total liquid capacity with the outlet compartment at 1/3 liquid capacity of the interceptor.

Access Openings (Manholes)

1. Access to grease interceptors shall be provided by a minimum of 1 manhole per interceptor division (baffle chamber) and of 24-inch minimum dimensions terminating 1 inch above finished grade with cast iron frame and cover. An 8" thick concrete pad extending a minimum of 12" beyond the outside dimension of the manhole frame shall be provided. One manhole shall be located above the inlet tee hatch and the other manhole shall be located above the outlet tee hatch. A minimum of 24" of clear opening above each manhole access shall be maintained to facilitate maintenance, cleaning, pumping, and inspections.
2. Access openings shall be mechanically sealed and gas tight to contain odors and bacteria and to exclude vermin and ground water, in a manner that permits regular reuses.
3. The manholes are to be accessible for inspection by the Commission.

Additional Requirements

Water Tight – Precast concrete grease interceptors shall be constructed to be watertight. A static water test shall be conducted by the installer and timed so as to permit verification through visual inspection by the Commission and any other regulatory agency. The water test shall consist of plugging the outlet (and the inlet if necessary) and filling the tank(s) with water to the tank top a minimum of 24 hours before the inspection. The tank shall not lose water during this test period. Certification by the plumbing contractor shall be supplied to the Commission prior to final approval of grease control equipment.

Location – Grease Interceptors shall be located so as to be readily accessible for cleaning, maintenance, and inspections. They should be located close to the fixture(s) discharging the greasy wastestream. If possible, Grease Interceptors should not be installed in "drive-thru" lanes or a parking area. Grease Interceptor access manholes shall never be paved over.

Cleaning – Grease interceptors shall be cleaned at a frequency of not less than once every 90 days unless approved by the Commission. Approval may be granted on a case by case basis after submission by the FSE of documentation establishing a proper basis for the proposed frequency. Grease interceptors must be pumped-in-full when the total accumulations of surface FOG (including floating solids) and settled solids reaches twenty-five percent (25%) of the grease interceptor's overall liquid depth. This criterion is referred to as the "25 Percent Rule". Some FSEs may have to pump their grease interceptors on a 30 day or 60 day schedule to meet the 25 Percent Rule criteria. At no time, shall the cleaning frequency exceed 90 days unless approved by the Commission. Approval may be granted on a case by case basis after submission by the FSE of documentation establishing a proper basis for the proposed frequency.

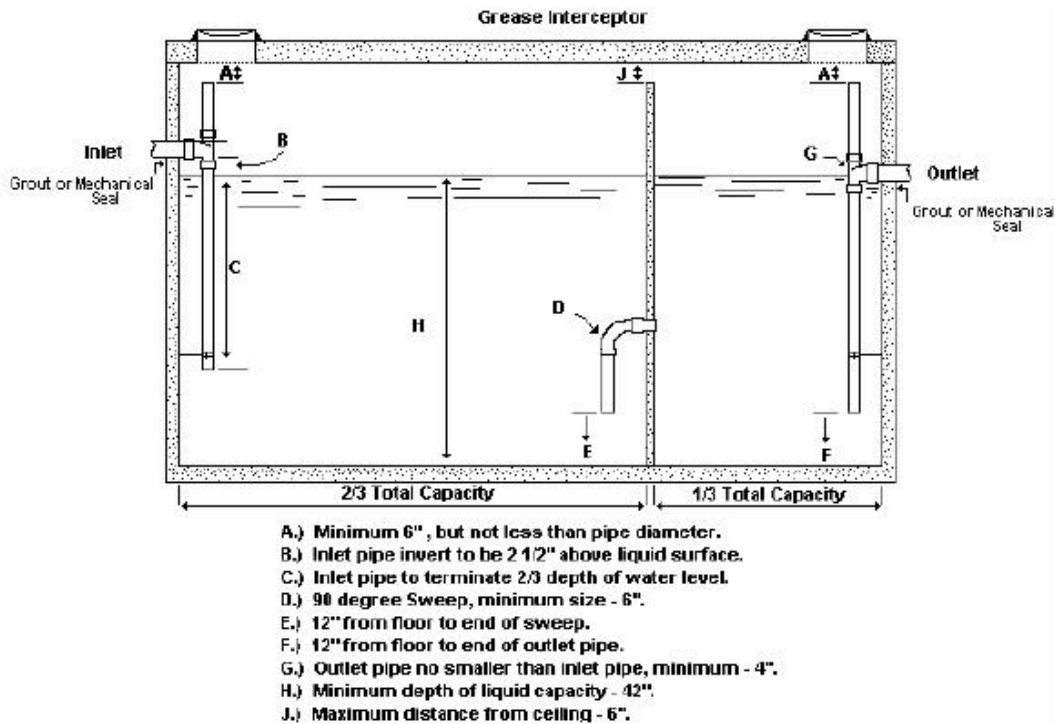
Responsibility – Removal of the grease from the wastewater routed to a public or private sanitary system is the responsibility of the user/owner.

Construction Material – Grease Interceptors shall be constructed of sound durable materials, not subject to excessive corrosion or decay, and shall be water and gas tight. Each interceptor shall be structurally designed to withstand any anticipated load to be placed on the interceptor (e.g., vehicular traffic in parking or driving areas).

Note: Concrete materials and other grease interceptor materials shall meet the American National Standards Institute, Inc. (ANSI) and International Association of Plumbing and Mechanical Officials (IAPMO) standards.

Marking and Identification - Prefabricated gravity grease interceptors shall be permanently and legibly marked with the following:

- Manufacturer's name or trademark, or both
- Model number
- Capacity
- Month and year of manufacture
- Load limits and maximum recommended depth of earth cover in feet; and
- Inlet and outlet



V. Grease Interceptor Cleaning/Maintenance Requirements

1. Grease Interceptor minimum size will be 1,000 gallon capacity, and maximum size will be 2,000 gallon capacity. If the FSE needs additional capacity, then grease interceptors will be installed in series.
2. Partial pump of interceptor contents or on-site pump & treatment of interceptor contents will not be allowed due to reintroduction of fats, oils and grease to the interceptor and pursuant to City of Princeton Sewer Use Ordinance Article V(B)(9) and (E)(3), and the Code of Federal Regulations (CFR) § 403.5 (b) (8), which states "*Specific prohibitions.* In addition, the following pollutants shall not be introduced into a POTW: Any trucked or hauled pollutants, except at discharge points designated by the POTW".
3. Grease interceptors must be pumped-in-full when the total accumulations of surface FOG (including floating solids) and settled solids reaches twenty-five percent (25%) of the grease interceptor's overall liquid depth. This criterion is referred to as the "25 Percent Rule". At no time, shall the cleaning frequency exceed 90 days unless approved by the Commission.

Approval may be granted on a case by case basis after submission by the FSE of documentation establishing a proper basis for the proposed frequency. Some existing FSEs in Class 2 through 5 will need to consider a pumping schedule of 30 days or 60 days to meet this requirement.

4. The Grease interceptor effluent-T shall be inspected during cleaning and maintenance and the condition noted by the grease waste hauler's company or individual conducting the maintenance. Effluent-T's that are loose, defective, or not attached must be repaired or replaced immediately.
5. Grease Interceptors must have access manholes over the influent-T and effluent-T for inspection and ease of cleaning/maintenance. Access manholes will be provided for all separate compartments of interceptors for complete cleaning (i.e., interceptor with two main baffles or three compartments will have access manholes at each compartment).
6. Grease Interceptors must be "certified" annually by a grease waste hauler or plumber. Grease Interceptor Certification (Form A) must be completed and submitted to the Commission annually. See General Requirements #6 and #7.

VI. Grease Trap Sizing, Installation, Cleaning, & Maintenance Requirements

1. *All* grease traps shall have a flow control restrictor and be properly vented. Failure to have the flow restrictor and venting will be considered a violation.
2. All new FSEs that are required to install grease traps must have Commission approval prior to starting operations.
3. Grease Trap minimum size requirement is a **20 gallon per minute / 40 pound capacity trap**.
4. Grease Traps must have the Plumbing Drainage Institute certification, and be installed as per manufacturer's specifications.
5. No automatic dishwasher shall be connected to an under-the-sink grease trap or floor grease trap.
6. No automatic drip or feed system additives are allowed prior to entering the grease trap.
7. A single grease trap device shall be installed for each significant kitchen fixture unit (i.e., each 3 compartment sink). The Commission must approve the number of grease traps and connections to the grease trap prior to FSE operation.
8. During cleaning of the grease trap, the flow restrictor shall be checked to ensure it is attached and operational.
9. Grease Traps will be cleaned of complete fats, oils, and grease and food solids at a minimum of every two (2) weeks. If the FOG and food solids content of the grease trap are greater than 25%, then the grease trap must be cleaned every week, or as frequently as needed to prevent 25% of capacity being taken from FOG and food solids.
10. Grease Trap waste should be sealed or placed in a container to prevent leaking, and then disposed, or hauled offsite by a grease waste hauler or plumber to an approved disposal location.
11. Grease Trap waste should not be mixed with yellow grease in the grease recycle container.
12. Grease Traps must be "certified" annually. See General Requirements #6 and #7.

VII. Accidental Discharge-Safeguards:

FSEs shall provide such facilities and institute such procedures as are reasonably necessary to prevent or minimize the potential for accidental discharge of fats, oils, and grease into the sewage collection system. This includes implementation of “Best Management Practices” protocols.

VIII. “Additives” Prohibition for use as Grease Management and Control

1. Additives include but are not limited to products that contain solvents, emulsifiers, surfactants, caustics, acids, enzymes and bacteria.
2. This FOG Management Policy prohibits the use of enzymes, hot water, emulsifiers or other additives to cause oil or grease to pass through the FSE's grease trap or grease interceptor designed to remove oil and grease. If the Commission identifies FOG in the downstream sewer system from a FSE that is using an additive, the Commission may require the FSE to discontinue use of the additive and initiate an enforcement action.
3. Additive use will not be a substitute for regular, required cleaning or pumping of grease control equipment.

IX. Right of Entry – Inspection and Monitoring

The Commission shall have the right to enter the premises of FSEs to determine whether the FSE is complying with the requirements of this policy and/or the City of Princeton Sewer Use Ordinance. FSEs shall allow Commission personnel and/or authorized representative or agents, upon presentation of proper credentials, full access to all parts of the FSE premises for the purpose of inspection, monitoring, and/or records examination. Unreasonable delays in allowing Commission personnel access to the FSE premises shall be a violation of this policy and the City of Princeton Sewer Use Ordinance.

The Commission may require that the FSE install monitoring or additional pretreatment equipment deemed necessary for compliance with this policy and/or the City of Princeton Sewer Use Ordinance.

X. Fee Option

The Commission may charge inspection, monitoring, assessment, impact, and permit fees to the food service establishments to cover the cost of implementing and enforcing the Commission’s FOG Policy.

XI. FOG Treatment, Disposal and Resource Recovery Plan

The Commission, at the discretion of the Superintendent, may implement a FOG Treatment, Disposal and Resource Recovery Plan (Plan). The plan may be implemented if there any problems identified with FOG disposal, continued FOG obstruction in the sewer system, or inconsistent maintenance provided by grease waste haulers to prevent FOG discharges from FSEs. The plan will include a Request For Proposal (RFP) for the treatment and disposal of FOG waste generated from FSEs connected to the City’s sewer and wastewater system. The RFP will include that the successful RFP respondent provide some form of beneficial reuse of the FOG waste that is treated. Also, the RFP may include a cost

estimate for maintenance (complete pump of grease interceptors and grease traps) and certification of the grease control equipment of all FSEs connected to the City's sewer and wastewater system. The results of the RFP may provide a single source for GCE pumping, GCE certification, FOG treatment, FOG disposal, and reporting to the Commission. The Commission will implement quality control practices to ensure that the successful RFP respondent meets all RFP requirements. In addition, the total cost of the food service establishment GCE pumping, and FOG treatment and disposal should be the same price or at a lower price than the average market cost of GCE maintenance.

XII. Enforcement Action

Enforcement Action may be initiated against the FSE for failure to clean or pump grease control equipment, failure to maintain grease control equipment including inspection and installation of properly functioning effluent-T and baffles, failure to install grease control equipment, failure to control FOG discharge from the FSE, use of additives so that FOG is diluted and pushed downstream of the FSE or any other failure of the FSE to comply with the terms and conditions of this Policy and/or the City of Princeton Sewer Use Ordinance.

Fats, Oils and Grease blockage in downstream manhole from FSE:

If FSE inspections and field investigations determine that any fats, oils and grease interference or blockage in the sewer system, a sewage pumping station, or the wastewater treatment plant is caused by a particular food service establishment, then that food service establishment shall be required to reimburse the Commission for all labor, equipment, supplies and disposal costs incurred by the Commission to clean the interference or blockage. The charges will be added to the FSEs water/wastewater bill. Failure to reimburse the Commission may result in termination of water service.

FSE failure to maintain GCE after Notification or NOV due date:

If a FSE fails to pump, clean or maintain their GCE after a Notice of Violation due date, the Commission may pump/clean the GCE to prevent additional FOG problems downstream. The FSE will be required to pay the cost of pumping and maintaining the FSE's GCE and the costs of all labor, equipment and supplies incurred by the Commission. Mechanical failure of a GCE will be considered a violation of the City of Princeton Sewer Use Ordinance pertaining to the construction and maintenance of pretreatment facilities and will subject the FSE to penalties of up to \$1,000 per violation per day.

Penalties

Penalties may be assessed against any FSE violating this Policy and or the City of Princeton Sewer Use Ordinance as authorized under the City of Princeton Sewer Use Ordinance or the Commission's Food Service Establishment Enforcement Response Plan.

APPROVED on first reading this ____ day of _____, 2011.

APPROVED on second reading this ____ day of _____, 2011.

Chairman-Princeton Water and Wastewater Commission