

Section VII – FOG Control Program

Background and Regulatory Requirements

The Statewide WDRs governing sanitary sewers specify FOG (Fats, Oils, and Grease) Control Programs as an element of each Wastewater Collection Agency's Sanitary Sewer Management Plan (SSMP). This element requires each agency to evaluate its service area to determine whether a FOG control program is needed. If the agency determines that a FOG control program is not needed, justification must be provided for why it is not needed.

Leucadia Wastewater District Actions

After conducting an analysis of the District's spill prevention performance over the last ten years, the District has determined that a formal FOG control program is not required at this time. The following information summarizes the analysis conducted to justify this determination.

The District's average daily dry weather flow exceeds 4 million gallons per day with a gravity collection system approximately 190 miles in length. Within the last 10 years, 75,000 gallons have spilled from the system, which is less than 0.006% of the annual flow.

Further, Figures 1 and 2 show that of the 75,000 gallons of sewage spilled, 1 spill (at 750 gallons) of the total 36 spills in this ten year period was attributable to FOG from restaurants and other food establishments. There are less than two hundred restaurant and food establishments within the District service area.

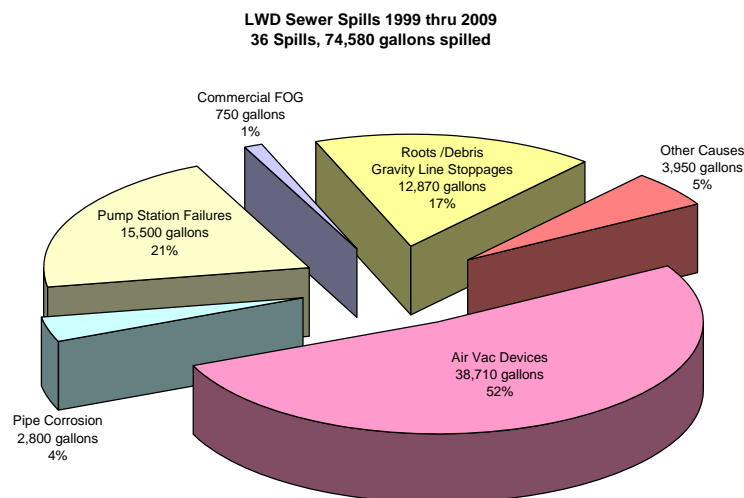


Figure 1

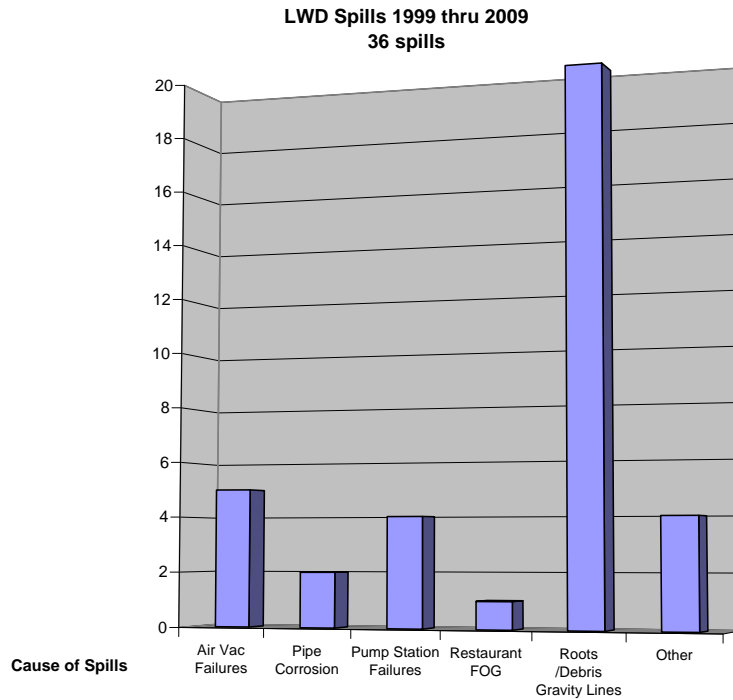


Figure 2

The District’s spill prevention success with minimal FOG related sewage spills is, in part, a result of the District practice of cleaning the gravity lines annually, which is discussed further in the SSMP Section IV – Operation and Maintenance Program. In addition to the ongoing cleaning of the sewer system, FOG prevention remains a key component of the District’s review process in the application for all new or amended sewer service permit(s). The permit application process (described in the District’s Wastewater Ordinance) includes a review of FOG prevention mechanisms for food establishment and industrial permits. The permit application process must be completed for any new permit for sewer service or when improvements would require a city permit, such as significant tenant improvements to a restaurant space. Finally, for the general public, the District website provides the public with basic information regarding the proper disposal of household FOG.

To date, as evident in the above analysis of FOG related spills, these practices are considered by the District to be the most effective practices in preventing SSOs. The District’s Wastewater Ordinance provides sufficient legal authority to appropriately address any FOG issues that arise. Specifically, it allows the District to take corrective actions ranging from issuing a written notice that a customer is in violation of the ordinance to suspension or termination of sewer service if a violation is not corrected as directed.

Finally, although this current evaluation has resulted in the determination that a formal FOG Control Program is not required, measurable changes in the number or volume of spills due to FOG noted as part of the District’s Monitoring, Measurement and Program

Modifications (Section IX) and its SSMP Program Audits (Section X) will result in the implementation of an appropriate formal FOG Control Program.

District Documents Referenced By This Section

- Food Establishment Registration/Information Form
- Wastewater Ordinance No. 119, Adopted April 9, 2008
- District Standard Spec