


FROM	NAME & TITLE	Rudolph S. Chow, Director	CITY of BALTIMORE MEMO	
	AGENCY NAME & ADDRESS	Department of Public Works 600 Abel Wolman Municipal Building		
	SUBJECT	DIRECTIVE 15-1 FATS, OILS & GREASE (FOG) PROGRAM		

TO

DATE: January 20, 2015

Bureau Heads & Division Chiefs

The Baltimore City Department of Public Works (DPW) is implementing a program for the control of fats, oils and grease (FOG) discharged to the sanitary sewer. In 2002 DPW entered into a Consent Decree with the USEPA and MDE to improve water quality and eliminate sanitary sewer overflows (SSOs) through improvements to the city sanitary sewer system. Paragraph 13 of the Consent Decree requires the City to implement a comprehensive FOG Program.

Legal authority for the FOG Program is in accordance with Article 25 of the Baltimore City Code, as amended, and state of Maryland and federal regulations. Federal General Pretreatment Regulations (40 CFR Part 403.5) require the development of inspection, compliance and enforcement activities to protect worker safety and health, the wastewater conveyance and treatment systems as well as sludge and effluent quality.

Therefore, in accordance with Subtitle 1 of Article 25, I am directing the Pollution Control Section to incorporate the FOG Program into wastewater discharge permits, inspections, compliance activities and enforcement actions applicable to food service establishments (FSEs) that discharge or have the potential to discharge FOG-bearing wastewater into the sanitary sewer.

This FOG Program Policy directive clarifies DPW responsibilities and FSE requirements not specified in the directive entitled Policy Decisions – Pretreatment Program dated April 16, 1986, addressing FOG violations. The FOG Program Policy also includes the following documentation to effectively manage the program activities:

FOG Manual and Appendices

The FOG Manual is an internal document describing the requirements of the FOG Program and specific activities to be performed by City personnel. In addition, it provides the user with information about FOG control, including sizing of a grease control device (GCD), inspection and maintenance guidelines. Implementation details are covered in Sections 4 through 7, which address permitting, data management, facility inspections and program enforcement. Relevant appendices are described below:

Appendix G – FSE Enforcement Response Plan (ERP)

The Enforcement Response Plan (ERP) provides guidance for the Mayor and City Council of Baltimore, acting through the Bureau of Water and

Wastewater under the Department of Public Works (collectively referred to as DPW) for investigations and responses to non-compliance by FSEs.

Appendix I – SOP for the FOG Program Conditional Waiver from Installation of Grease Control Device (GCD)

Issuance of Conditional Waivers from the installation of a GCD allows the DPW Director (or his/her delegated representative) the authority to waive the requirement when it is determined that a FSE FOG discharge is negligible and has an insignificant impact on the sanitary sewer. The waiver is conditional. It may be rescinded at any time if the conditions for its issuance are no longer valid or true.

Appendix J - Memorandum of Understanding (MOU) between DPW, Department of Housing and Community Development (DHCD) and Health Department (HD) Effective: 10-29-2013

The purpose of the MOU is to set forth the duties and obligations of DPW, DHCD and HD to include but not limited to:

1. Maintain compliance with the Clean Water Act and requirements of the Consent Decree;
2. Make every effort to eliminate dry-weather, grease-related SSOs;
3. Minimize FOG discharged to the sanitary sewer system;
4. Improve GCD maintenance practices;
5. Educate users of the sanitary sewer system about kitchen best management practices (BMPs); and
6. Facilitate inter-agency coordination for the FOG Program.

Compliance with FOG Program Requirements

All FSEs that discharge or have the potential to discharge FOG into the sanitary sewer must comply with the FOG Program as described below:


1. Have a valid Wastewater Discharge Permit. DPW's Pollution Control Section issues these permits to non-residential users of the sanitary sewer system;
2. Have a properly sized, installed and functioning GCD. To be effective, each GCD is to be sized and installed in accordance with the Baltimore City Plumbing Code;
3. Clean and maintain the GCD frequently enough to comply with the 25% Rule (FOG Program Manual (2013) 3.3.1.) This frequency will depend on the number of fixtures discharging to it, the seating capacity of the establishment and the capacity of the device;
4. Keep a GCD maintenance log up-to-date and on-site. The log must document each GCD inspection, maintenance and disposal activities performed. Waste hauler manifests and maintenance records must be retained for three years; and

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5. Properly collect and dispose of FOG. It should be disposed as solid waste or stored in a covered, leak-proof receptacle until it can be taken off-site by a licensed hauler.



Rudolph S. Chow, P.E.
Director

RSC/JP:pb

cc: Mayor's Office
Honorable Board of Estimates
Comptroller's Office
Fire Department
Police Department
Department of Housing and Community Development
Department of Finance
Legislative Reference