



OIL, GREASE, AND GRIT INTERCEPTORS INFORMATION

CCWA Sewer Use Ordinance Section 98-7 (G)

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Oil, grease, and grit interceptors shall be provided when they are necessary for the proper handling of wastewater containing excessive amounts of grease and oil, or sand; except that such interceptors shall not be required for residential users. All interceptor units shall be of the type and capacity approved by CCWA.

1. Requirements:

- (a) Any user who discharges a wastewater which contains greater than the quantity of oil and grease regulated in Sec. 98-6 (A)(3)(i) that states, “wastewater discharged must have Total Oil & Grease < 200 mg/l”; and provided that the excess oil and grease is floatable and can be effectively removed in an oil/grease interceptor, then said user will be required to install an oil/grease interceptor. This includes all facilities that have a potential to discharge petroleum based products to the sanitary sewer such as vehicle maintenance facilities.
- (b) All users whose wastewater discharge is associated with large quantities of grit, sand, or gravel shall be required to install a sand interceptor or trap. All car/truck wash systems shall be required to install sand traps.

2. Design Criteria:

- (a) All oil, grease, and grit interceptors used in conjunction with facilities other than food service establishments shall have a capacity that will provide not less than ten (10) minutes nor more than thirty (30) minutes retention time at the peak eight (8) hour flow rate. Flow-through velocities shall not exceed one (1) foot per second at the peak eight (8) hour flow rate. No oil/water separator or sand/grit interceptor shall be smaller than 750 gallons or larger than 3,000 gallons. If the calculated capacity exceeds 3,000 gallons, then multiple units in series shall be installed.
- (b) All oil, grease, and grit interceptors shall have two access ports that will allow for inspection, sampling, and cleaning.

3. Maintenance:

- (a) All oil, grease, and grit interceptors shall be maintained by the user at his expense, and in continuous efficient operation at all times. In the maintaining of these interceptors, the owner shall be responsible for the proper removal and disposal by appropriate means of the captured materials, and shall maintain records of the dates, and means of disposal that are subject to review and inspection by CCWA.
- (b) All oil, grease, and grit interceptors shall be pumped out and cleaned, at a minimum annually or when 50% of the retention capacity is filled with oils and/or solids. The frequency of removal may be increased by CCWA or the user to ensure that no overflows of oil, grease, or sand into the wastewater system ever occur.

4. If the owner contracts for the cleaning, removal, or hauling of collected materials with a currently licensed waste disposal firm, then a manifest must be available from the company hauling the waste away. Under no circumstances shall the collected materials ever be

returned to the wastewater system. CCWA may require a user to submit periodic reports about the cleaning, removal, or hauling of collected materials from the separator or interceptor. Such records shall be kept on site for a period of three (3) years and be made available upon request.

5. An inspection by CCWA may be conducted on all oil, grease, and grit interceptors and shall require the owner to correct any deficiencies immediately at his own expense.

APPENDICES

- A. CCWA Grease Enforcement Response Plan
- B. CCWA Oil, Grease, & Grit Interceptor Sizing
- C. CCWA Oil, Grease, & Grit Interceptor Detail

Appendices

Appendix A

CLAYTON COUNTY WATER AUTHORITY GREASE ENFORCEMENT RESPONSE PLAN

A.) Introduction

The purpose of this document is to present a plan for uniform enforcement actions to deal with User noncompliance with applicable state and federal laws required by the Clean Water Act of 1977 and the CCWA Sewer Use Ordinance, specifically section 98-7 dealing with grease.

B.) User Inventory

It is the responsibility of CCWA to maintain an inventory of users that have or are required to have grease interceptors. The following list includes a number of resources used by Clayton County Water Authority for identifying new facilities:

- 1.) Telephone listings
- 2.) Previous survey results
- 3.) Restaurant directories
- 4.) Sewer connection permits
- 5.) Referrals from other agencies (Environmental Health, etc.)
- 6.) Site visits
- 7.) Reports from other regulated industries
- 8.) Citizen reports
- 9.) Contact from potential restaurants
- 10.) Observations by sampling/surveillance/inspection/personnel
- 11.) Newspaper, trade journal, or business magazine articles
- 12.) Chamber of Commerce
- 13.) Clayton County Economic Development Director.

All new food service facilities are subject to requirements in the CCWA Grease Management Program and are added to the master list of regulated facilities.

C.) Compliance Monitoring Procedures

Compliance monitoring activities conducted by Clayton County Water Authority are necessary to identify and document violations that can be presented as admissible and irrefutable evidence in administrative actions and legal proceedings. Industrial compliance with applicable regulations is determined and evaluated through:

- 1.) Reported data from users
- 2.) Inspections conducted by CCWA or Health Officer
- 3.) Surveillance sampling and analysis conducted by CCWA
- 4.) Evaluation of application information by CCWA

D.) Data Screening

The majority of the data to be screened and evaluated is generated through manifests, inspections, and sampling. All data generated by these activities are reviewed by the Environmental Compliance Inspector under the direction of the Environmental Compliance Coordinator on a weekly basis. Each violation is noted and appropriate enforcement action initiated. The specific responses and time frames are detailed in the Enforcement Response section. Screening and tracking of reports submitted as part of a schedule of compliance are reviewed at least twice monthly. Action is taken if required manifests are not received within 14 (fourteen) days or if milestones are missed. Tracking of timely submission of information is done on a checklist and database made specifically for that purpose.

E.) Identification of Violations

The identification of a violation of grease requirements, regardless of the severity, will initiate the enforcement process. Discovery of a violation may occur as result of any number of activities that include:

- 1.) Review of Clayton County Water Authority surveillance-sampling results
- 2.) Review of user manifests
- 3.) Spill/accidental discharge reports from user
- 4.) Notification of violation by the user
- 5.) Site visits/inspections by Clayton County Water Authority
- 6.) Other information provided by the user's employees
- 7.) Observations of field personnel
- 8.) Information provided by the public or private citizens
- 9.) Review of compliance schedule requirements
- 10.) Review of agreed judgment requirements
- 11.) Information provided by other agencies.

Once violations are identified, it is the responsibility of the Environmental Compliance Coordinator to implement the appropriate enforcement response required in the plan. When determining an appropriate response, particularly one that includes the imposition of penalties and/or fines, the specific procedures outlined in the Enforcement Response section must be followed. However, additional criteria may be used in the determination including:

- 1.) Magnitude of violation
- 2.) Duration of violation
- 3.) Effect of the violation on the POTW and or/the environment
- 4.) Compliance history of the customer
- 5.) Good faith of the customer

F.) Enforcement Procedures

Generally, all violations identified by Clayton County Water Authority are reviewed, evaluated, and addressed by the appropriate enforcement response. The majority of enforcement actions begin with issuance of an initial notice of violation. This letter describes the nature of the violation and informs the user that any additional violations may result in an escalated enforcement action. Once the user has been notified of a violation or has knowledge of a condition which is a violation, the user may be allowed up to seven (7) days to correct the noncompliance before escalation of the enforcement process occurs. This seven (7) day period applies only to the initial violation. Any violations occurring after this period will be evaluated according to plan procedures. In the case of an emergency, a written or verbal warning shall be given to the user, and the user will have twenty-four (24) hours to comply.

G.) Enforcement Remedies Available to Clayton County Water Authority

The following list is arranged from least severe to most severe:

- 1.) Verbal Warning (VW)
- 2.) Site Visit (SV)
- 3.) Increased Pumping Frequency (IPF)
- 4.) Re-Inspection (RI)
- 5.) Letter of Violation (LOV)
- 6.) Second LOV (2LOV)
- 7.) Final LOV (FLOV)
- 8.) Consent Orders (CO)
- 9.) Show-cause Hearing (SCH)
- 10.) Compliance Order or Schedule of Compliance (SOC)
- 11.) Cease and Desist Order (CDO)
- 12.) Administrative Fines (AF)
- 13.) Emergency Suspensions (ES)
- 14.) Termination of Discharge (TOD)
- 15.) Water Supply Severance (WSS)
- 16.) Judicial Enforcement Remedies or Litigation (LIT)

For further information or definitions of these enforcement remedies, consult the Clayton County Water Authority Sewer Use Ordinance section 98-13.

H.) Staff Responsibilities

- 1.) Environmental Compliance Coordinator and staff oversee all collection and screening of data, organization of enforcement actions, review of actions taken, and general management of enforcement response procedures. They are authorized to administer enforcement remedies from Verbal Warnings to Increased Pumping Frequency.
- 2.) General Manager and Water Reclamation Department Manager shall oversee escalated enforcement remedies of Consent Orders to Litigation.

CCWA GREASE ENFORCEMENT RESPONSE GUIDE

Noncompliance	Nature of Violation	Range of Response
Record or Reporting Violation	Missing or incomplete Information	VW, SV, RI, LOV, 2LOV, FLOV
	Failure to provide Required reports (14 days late)	LOV, 2LOV, FLOV, SCH, SOC, AF
	Falsification of records or manifests	CO, SCH, SOC, AF, TOD, WSS, LIT
Failure to Maintain Grease Interceptor/ Improper Alteration	Infrequent	VW, SV, RI, IPF, LOV, 2LOV
	Frequent or Recurring	FLOV, CO, SCH, SOC, AF, TOD, WSS, LIT
Improper Waste Disposal	Evidence of Intent (Dumping into sewer or storm drain)	VW, SV, RI, LOV, 2LOV, FLOV CO, SCH, SOC, AF, TOD, WSS, LIT
Compliance Schedules	Missed Milestone	VW, SV, LOV, 2LOV, FLOV
	Failure to Install Required Equipment	CO, SCH, SOC, AF, TOD, WSS, LIT
	Missed Final Date (90 days outstanding without valid cause)	CO, SCH, SOC, AF, TOD, WSS, LIT
Failure to Mitigate Noncompliance or Cease Production	Failure to cease discharge	CO, SCH, SOC, AF, TOD, WSS, LIT
Failure to Provide Free Access to Facility or records	Initial Violation	VW, SV, RI, IPF, LOV, 2LOV,
	Recurring Violation	FLOV, CO, SCH, SOC, AF, TOD, WSS, LIT

CCWA ENFORCEMENT GUIDANCE AND TIME FRAMES

- 1.) Whenever an NOV is issued that requires a response and the user fails to respond, the next level of enforcement should be taken.
- 2.) Enforcement responses may be escalated as needed and CCWA is empowered to take more than one enforcement action against any non-compliant user.
- 3.) CCWA may charge any user for Recovery of Costs incurred.
- 4.) Time frames for enforcement responses:
 - a.) All violations will be identified and documented within five (5) working days of receiving compliance information.
 - b.) Initial enforcement responses involving contact with customers and requesting information on corrective or preventative action(s) will occur within seven (7) days of violation detection.
 - c.) Follow up actions for continuing or recurring violations will be taken within fourteen (14) days of the initial enforcement response. For all continuing violations, the response will include a compliance schedule.
 - d.) Violations that threaten health, property or environmental quality are considered emergencies and will receive immediate responses such as halting the discharge of the user.

Appendix C

