



CLAYTON COUNTY WATER AUTHORITY GREASE MANAGEMENT PROGRAM

CCWA Sewer Use Ordinance Section 98-7 (F)

**CCWA Environmental Compliance
688 Flint River Rd.
Jonesboro, GA 30238
Phone # 770-302-3463**

standards. CCWA may require the industrial waste hauler to provide a waste analysis of any load prior to discharge.

4. Industrial waste haulers must provide a waste-tracking form for every load. This form shall include, at a minimum, the name and address of the industrial waste hauler, permit number, truck identification, names and addresses of sources of waste, and volume and characteristics of waste. The form shall identify the type of industry, known or suspected waste constituents, and whether any wastes are RCRA hazardous wastes.

(E) Groundwater Remediation Sites

1. Groundwater remediation site wastewater may be introduced into the POTW only at locations designated by CCWA, and at such times as are established by CCWA. Such waste shall not violate Sec. 98-6 of this ordinance or any other requirements established by CCWA. The Manager shall require groundwater remediation sites to obtain wastewater discharge permits.
2. CCWA also may prohibit the discharge of groundwater remediation site wastewater. The discharge of groundwater remediation site wastewater is subject to all other requirements of this ordinance.
3. No wastewater may be discharged without prior consent of CCWA. The Manager may collect samples of the discharge to ensure compliance with applicable standards.

(F) Food Service Facility Grease Management Program

1. The purpose of this program is to minimize the introduction of fats, oils, and greases into the Clayton County Water Authority (CCWA) wastewater collection system. The main components of the program are the proper sizing, installation, and maintenance of grease interceptors. The administrative and inspection requirements of Food Service Facilities are established herein as well.
2. General Criteria:
 - a. Installation Requirements for New Food Service Facilities - All proposed or remodeled Food Service Facilities inside the CCWA Wastewater Service area shall be required to install an approved, properly operated and maintained grease interceptor. All interceptor units shall be installed outdoors of the Food Service Facility building unless the user can demonstrate to CCWA that an outdoor interceptor would not be feasible. All interceptor units shall be of the type and capacity approved by the County and CCWA.
 - b. Prohibited Discharges - Domestic Wastewater shall not be discharged to the grease interceptor unless specifically approved, in writing, by CCWA.
 - c. Requirements for Existing Food Service Facilities - All existing Food Service

Facilities inside the CCWA Wastewater Service area are expected to conduct their operations in such a manner that grease is captured on the user's premises and then properly disposed. Existing Food Service Facilities will be handled under CCWA's Grease Management Program in the following manner:

- i. CCWA will periodically inspect each Food Service Facility on an as-needed basis to assure that each facility is complying with the intent of the Grease Management Program. The as needed inspection shall be determined by the CCWA.
- ii. Each Food Service Facility in the vicinity of the problem area will be inspected. The facilities' grease control practices and the adequacy of their grease control interceptor/equipment will be assessed. Maintenance records will also be reviewed.
- iii. Following the inspections, CCWA will send written notice to the inspected Food Service Facilities, containing a summary of the policy requirements, and the results of the inspection. The inspections will typically result in one or more of the following actions:
 1. Facilities equipped with an appropriate and adequately sized grease interceptor who are meeting the intent of the Grease Management Program through effective grease control practices will be commended for their compliance.
 2. After notice and an opportunity to be heard, facilities not in compliance shall be issued a letter of violation and, if such facility fails to achieve compliance, it shall be required to develop and submit to CCWA a proposed plan designed to achieve compliance through improved housekeeping and/or increased maintenance and pumping on the existing grease interceptor/equipment.
 3. Facilities that are not successful in achieving compliance with the intent of the Grease Management Program through improved housekeeping and increased maintenance and pumping on the existing grease interceptor/equipment will be required to install the necessary interceptor/equipment to bring the facility into compliance.
- iv. Alteration of an existing grease trap is prohibited by CCWA. If alteration is found, then an approved, properly sized grease interceptor will be required to bring the facility into compliance according to the Grease Management Program.
- d. Waste Minimization Plan – Food Service Facilities shall develop and implement a Waste Minimization Plan pertaining to the disposal of grease, oils, and food particles. Educational materials are available from CCWA Environmental Compliance regarding the minimization of these wastes.
- e. Floor Drains - Only floor drains which discharge or have the potential to

discharge grease shall be connected to a grease interceptor.

- f. Location - Each grease interceptor shall be installed and connected so that it is easily accessible for inspection, cleaning, and removal of the intercepted grease at anytime. Grease interceptors required under this ordinance shall be installed outdoors of the food service facility. The best location is in an area outside of an exterior wall, but upstream from the domestic wastewater drain line(s). A grease interceptor may not be installed inside any part of a building unless approved in writing by CCWA. The user bears the burden of demonstrating that an outdoor grease interceptor is not feasible.

3. Design Criteria:

- a. Construction of Interceptors - Grease interceptors shall be constructed in accordance with the County plumbing standards and outdoor units shall have a minimum of two compartments with fittings designed for grease retention. All alternative grease removal devices or technologies shall be subject to the written approval of CCWA. Such approval shall be based on demonstrated removal efficiencies of the proposed technology.
- b. Access – Outdoor grease interceptors shall be provided with 2 (two) manholes terminating 1-inch above finished grade with cast iron frame and cover. All grease interceptors shall be designed and installed to allow for complete access for inspection and maintenance of inner chamber(s) as well as viewing and sampling of wastewater discharged to the sanitary sewer.
- c. Load-Bearing Capacity - In areas where additional weight loads may exist, the grease interceptor shall be designed to have adequate load-bearing capacity (example: vehicular traffic in parking or driving areas).
- d. Inlet and Outlet Piping - Wastewater discharging to the grease interceptor shall enter only through the inlet pipe of the interceptor. The inlet pipe bottom tee branch shall extend one (1) foot below liquid level. The outlet pipe bottom tee branch shall be submerged to 2/3 of the liquid depth. Each grease interceptor shall have only one inlet and one outlet pipe.
- e. Interceptor Sizing -
 - i. Outdoor grease interceptors shall not have a capacity of less than 1,500 gallons nor exceed a capacity of 3,000 gallons. No matter what the calculated capacity using the following formulas, the minimum interceptor size shall be 1,500 gallons. If the calculated capacity using one of the following formulas exceeds 3,000 gallons, then multiple units in series shall be installed. The size of a grease interceptor shall be approximated by the following methods and grease interceptor size shall be the larger of the two results.

1. Interceptor Capacity (gallons) = (S) x (25) x (Hr/12)

S = Number of Seats

Hr = Maximum hours of daily operation

(Include preparation and clean up time)

2. Interceptor Capacity (gallons) = (Sum of fixture flows) x (20)

Type of Fixture	Flow Rate (gpm)
Restaurant hand sink	15
Pre-rinse sink	15
Single-compartment sink	20
Double-compartment sink	25
Two double-compartment sinks	35
Dishwasher up to 30 gallons	15
Dishwasher up to 50 gallons	25
Dishwasher up to 100 gallons	40
Other fixture	Manufacturer peak

- ii. All under counter or in-line grease interceptors shall not have a capacity of less than 100lbs. Under-sink or in-line grease interceptor requirements shall meet Plumbing and Drainage Institute Standard PDI-G101:

Type of Fixture	Flow Rate (gpm)	Grease Retention Capacity (lbs)
Restaurant hand sink	15	30
Pre-rinse sink	15	30
Single-compartment sink	20	40
Double-compartment sink	25	50
Two double-compartment sinks	35	70
Dishwasher up to 30 gallons	15	30
Dishwasher up to 50 gallons	25	50
Dishwasher up to 100 gallons	40	80
Other fixture	Manufacturer peak	gpm x 2

Grease interceptor designs represent minimum standards for normal usage. Installations with heavier usage require more stringent measures for which the user is responsible and shall pay the costs to provide additional measures if required by CCWA. CCWA reserves the right to evaluate interceptor sizing on an individual basis for facilities with special conditions, such as highly variable flows, high levels of grease discharge, or other unusual situations that are not adequately addressed by the formula.

4. Grease Interceptor Maintenance:

- a. Pumping - All grease interceptors shall be maintained by the user at the user's expense. Maintenance shall include the complete removal of all contents, including floating materials, wastewater, and bottom sludges and solids. Decanting or discharging of removed waste back into the interceptor from which the waste was removed or any other grease interceptor, for the purpose of reducing the volume to be disposed, is strictly prohibited.

- b. Pumping Frequency – Outdoor grease interceptors must be pumped out completely a minimum of once every three months. Under-sink or in-line grease interceptors must be pumped/cleaned out completely a minimum of once every month. Grease interceptors may need to be pumped more frequently as needed to prevent carry over of grease into the sanitary sewer collection system. Pumping frequency may be extended past the minimum period if it can be demonstrated by the user and approved by CCWA.
 - c. Pump Out Order – When the oil and grease concentrations exceed CCWA's maximum discharge limits and/or the combined depth of bottom and top solids exceeds 25% of the total depth of the trap, CCWA will issue a Pump Out Order to the user. The user shall have seven (7) days from receipt of the order to comply. Where an emergency exists, a written or verbal warning shall be given to the user, and the user will have twenty-four (24) hours to comply.
 - d. Disposal of Interceptor Pumped Material – All waste removed from each grease interceptor shall be recorded on a proper manifest form. Also, all waste removed from each grease interceptor must be disposed at a facility approved by CCWA to receive such waste in accordance with the provisions of this program. In no way shall the pumped material be returned to any private or public portion of the sanitary sewer collection system. Responsibility for waste removed from or found in a grease interceptor or waste improperly disposed of shall be placed upon the private company generator Food Service Facility owner.
 - e. Additives - Any additive(s) placed into the grease interceptor or building discharge line system on a constant, regular, or scheduled basis shall be reported to CCWA. Such additives shall include, but are not be limited to commercially available bacteria or other additives designed to absorb, consume, or treat fats, oils, and grease. The use of additives shall in no way be considered as an alternative technology or a substitution for maintenance procedures required herein.
 - f. Chemical Treatment - Chemical treatments such as drain cleaners, enzymes, acids, and other chemicals designed to dissolve, purge, or remove grease shall not be allowed to enter the grease interceptor.
5. Administrative Requirements:
- a. Initial Data Acquisition - All food service facilities will be asked to complete a data sheet to establish the grease interceptor database. The CCWA database will be updated with additional or modified information after each yearly inspection.
 - b. Administrative Fees - No fee will be charged for an annual inspection by CCWA. However, if the user's grease interceptor is not in compliance with this section, up to a \$200.00 re-inspection fee may be charged for each inspection thereafter until compliance is achieved.
 - c. Inspection and Entry - Authorized personnel of CCWA, bearing proper credentials and identification, shall have the right to enter upon all properties

subject to this program, at any time and without prior notification, for the purpose of inspection, observation, measurement, sampling, testing or record review, as part of this program.

- d. Record Retention and Reporting – All users must keep a record of any cleaning or maintenance of their grease interceptor. The following records must be kept on-site at the Food Service Facility for a period of three (3) years. Manifests are required for all grease interceptors and shall contain the following information:

1. Food Service Facility (generator) information, including name, address, volume pumped, date and time of pumping, and generator signature verifying the information;
 2. Transporter information, including company name, address, license plate number, permit number, driver name, and driver signature verifying transporter information; and
 3. Receiving information, including facility name, address, date and time of receiving, EPD permit number, and signature verifying receipt of the waste.
 4. Manifests must be mailed, faxed, or electronically submitted to CCWA Environmental Compliance within fourteen (14) days of interceptor maintenance.
 5. A manifest is required for under-sink or inline grease interceptors.
6. Enforcement of these regulations shall be in accordance with the provisions of the CCWA Enforcement Response Plan. Failure to comply with this program will be grounds for penalty imposition and/or discontinuance of service. Additionally, failure to comply may result in Health Officer revoking food service permit.

(G) Oil, Grease, and Grit Interceptors

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); 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

APPENDICES

APPENDIX A

GREASE INTERCEPTOR CUSTOMER INFORMATION FORM

Sheet is on the following page.



**CLAYTON COUNTY WATER AUTHORITY (CCWA)
FOOD SERVICE FACILITY INSPECTION FORM**

Completed By: CCWA Environmental Compliance Inspector: _____
Or Customer Name: _____ Date: _____ Time: _____
Facility Name: _____ Store Phone#: () _____
Address: _____ City: _____ Zip: _____
Contact Name: _____ Title: _____
Office #: _____ Cell #: _____
E-mail address: _____
Company Name: _____ Phone #: _____
Mailing address (if different than above): _____

Please check all that apply:

- ☐ Low Flow/Squeeze Nozzles ☐ Waste Minimization Plan ☐ Floor Drains
☐ Recycle Yellow Grease ☐ Yellow Recycling

Company Name: _____
Phone number: _____

Circle Type of Grease Interceptor: Inside - Size _____ lbs Outside - Size _____ gallons
Size _____ lbs Outside - Size _____ gallons

Is the grease interceptor accessible? Yes/No _____

Detailed Description of Location of Grease Interceptor: _____

Does inside trap have low flow nozzle? Yes/No _____

Grease Interceptor Pumping Company: _____
Is Manifest Current? Yes/No Cleaning Frequency: Monthly/Quarterly/Other _____

Last Pump Out Date: _____ Manifest #: _____

Circle Grease Interceptor Condition: Good Fair Needs Attention Poor

Are Tee's Present?: Yes/ No _____

Interceptor Profile: Total Depth of Grease Trap _____
% Grease solids

Is Interceptor PDI certified? Yes/No _____

APPENDIX B

CCWA GREASE INTERCEPTOR SIZING WORKSHEETS

Sheets are on the following pages in this appendix.



Clayton County Water Authority Inside Grease Interceptor Sizing Formula for Food Service Facility

Instruction: Enter your information below

Stores Name: _____	Tracking Number: _____
Owners Name: _____	Date: _____
Stores Address: _____	
Customer Phone: _____	Cell #: _____
Customer Email: _____	
Engineer Name: _____	Engineer Phone: _____
Engineer Email: _____	
Plumber Name: _____	Plumber Phone: _____

- 1.) The size of a grease interceptor shall be approximated by using the sizing method below which meets sizing requirement in the Clayton County Water Authority Sewer Use Ordinance under 98-7 (F)(3)(e)(ii). A grease interceptor conforming to Standard PDI-G101 is designed and certified to operate efficiently at its maximum flow rate in GPM and retain a minimum of twice its rated GPM in lbs. of grease.
- 2.) Under-sink or in-line grease interceptor requirements shall meet Plumbing and Drainage Institute Standard PDI-101 and shall be installed in accordance with the manufacturer's instructions.
- 3.) Properly sized grease interceptors are required for each fixture.
- 4.) Restaurants with multiple fixtures plumbed into a single grease trap require a minimum size of 100 lbs. grease interceptor.
- 5.) Inside grease interceptors are not allowed when the flow rate is > 100 gpm.
- 6.) Customer must provide verification that all fixtures flow to the single grease interceptor serving multiple fixtures.
- 7.) The flow control device is to be adequate in size for the interceptor tested and shall be equipped with the proper size orifice and/or other details to provide the proposed flow rate of the subject interceptor, based on the simultaneous drainage of both sink compartments as detailed herein. The vent from the flow control shall extend above the flood rim of the sink. A flow control valve with the gallons per minute should be easily visible on the grease interceptor.
- 8.) A PDI certification seal and PDI nameplate shall be in a visible location on the grease interceptor.
- 9.) Facilities that require floor drain protection cannot use inside grease interceptors. (ex. butchers, bakeries)
- 10.) Dishwashers are not allowed.

Instruction: Enter numerical values into the appropriate BLUE CELLS below

Method 1

Type of Fixture	Flow Rate (gpm)	Number of Fixtures
Restaurant Hand Sink	15	
Pre-Rinse sink	15	
Single-compartment sink	20	
Double-compartment	25	
Triple-compartment	30	
Two double-compartment sinks	35	

Enter any flow that is not listed above in the cells below

Other fixture description	Manufacturer Peak Flow Rate	

Method 2: Interceptor Capacity (gallons) = (Seats) x (25) x (Hr/12)

Number of Seats	Daily Operating Hours including Prep. & Clean Up Time

Calculated Results:

Method 1 : Based off of Fixture Flow

Single size interceptor needed to provide adequate treatment for flow from all fixtures:

Grease Interceptor: _____ 0 lbs
 Grease Interceptor: _____ 0 gallons

Method 2: Based off of seats/operating hours

Grease Interceptor: _____ 0 gallons _____ 0 lbs

Grease interceptor designs represent minimum standards for normal usage. Installations with heavier usage require more stringent measures for which the user is responsible and shall pay the cost to provide additional measures if required by CCWA. CCWA reserves the right to evaluate interceptor sizing on an individual basis for facilities with special conditions, such as highly variable flows, high levels of grease discharge, or other unusual situations that are not adequately addressed by the above methods.



Clayton County Water Authority Grease Sizing Formula for Food Service Facility

Instruction: Enter your information below

Restaurant / Facility Name: _____
Owners Name: _____ Date: _____
Stores Address: _____
Store # _____ Cell #: _____
Customer Email: _____
Engineer Name: _____ Engineer Phone: _____
Engineer Email: _____
Plumber Name: _____ Plumber Phone: _____

Instruction: Enter numerical values into the appropriate BLUE CELLS below

Method 1: Interceptor capacity based on numbers of seats

Number of Seats	Daily Operating Hours including Prep. & Clean Up Time

Instruction: Enter numerical values into the appropriate BLUE CELLS below

Method 2: Inceptor capacity based on fixture flows

Include any condensate lines, Floor drains/sinks, Kitchen Kettles, Wok spickets, Soda fountains, ANYTHING, etc.
Anything that flows & goes into the grease trap must be calculated in to be up to code & to stay with in compliance.

Type of Fixture	Flow Rate (gpm)	Number of Fixtures
Restaurant Hand Sink	15	
Pre-Rinse (Dishwasher) sink	15	
Single-compartment sink	20	
Double-compartment	25	
Triple-compartment	30	
Two double-compartment sinks	35	
Dishwasher up to 30 gallons	15	
Dishwasher up to 40 gallons	20	
Dishwasher up to 50 gallons	25	
Dishwasher up to 100 gallons	40	

Enter any additional flow that has not been listed above in the cells below such as:

Any facilities with floor drains that use wash down procedures (must include the number of spigots available for use).

Other fixture description	Manufacturer Peak Flow Rate

Calculated Results:

Interceptor Size Calculated by Method 1: _____ 0 gallons

Interceptor Size Calculated by Method 2: _____ 0 gallons

Required Interceptor Capacity: _____ 1500 gallons

(Note: Required Interceptor Capacity can be discussed with the authority to reach an agreeable value)

Outdoor grease interceptors shall not have a capacity of less than 1500 gallons nor exceed a capacity of 3,000 gallons. No matter what the calculated capacity using the following formulas, the minimum interceptor size shall be 1,500 gallons. If the calculated capacity using one of the following formulas exceeds 3,000 gallons, then multiple units in series shall be installed.

Instruction: Enter numerical values into the appropriate BLUE CELLS below

Stores Name: _____

Date: _____

Trap #1 Vol. (gal.)	Trap #2 Vol. (gal.)	Trap #3 Vol. (gal.)	Trap #4 Vol. (gal.)

Total Trap Volume: _____ 0 gallons

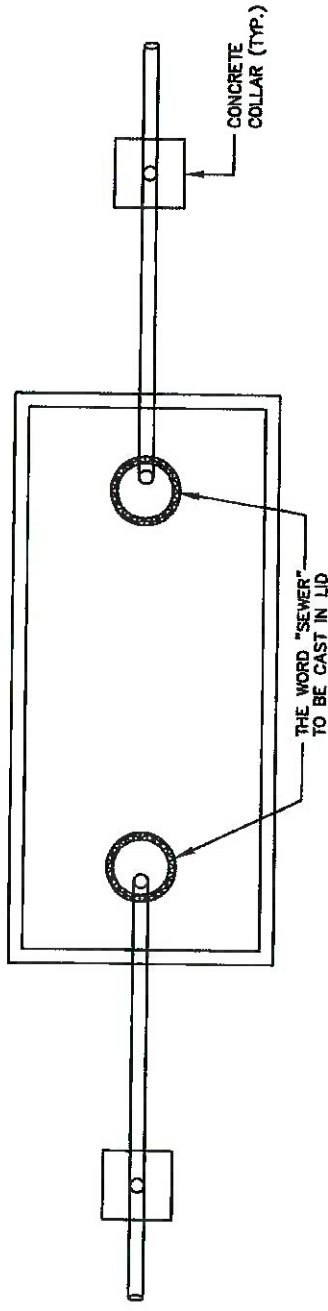
(Note: Total Trap Volume must be greater than or equal to the Required Interceptor Capacity)

Grease interceptor designs represent minimum standards for normal usage. Installations with heavier usage require more stringent measures for which the user is responsible and shall pay the cost to provide additional measures if required by CCWA. CCWA reserves the right to evaluate interceptor sizing on an individual basis for facilities with special conditions, such as highly variable flows, high levels of grease discharge, or other unusual situations that are not adequately addressed by the above methods.

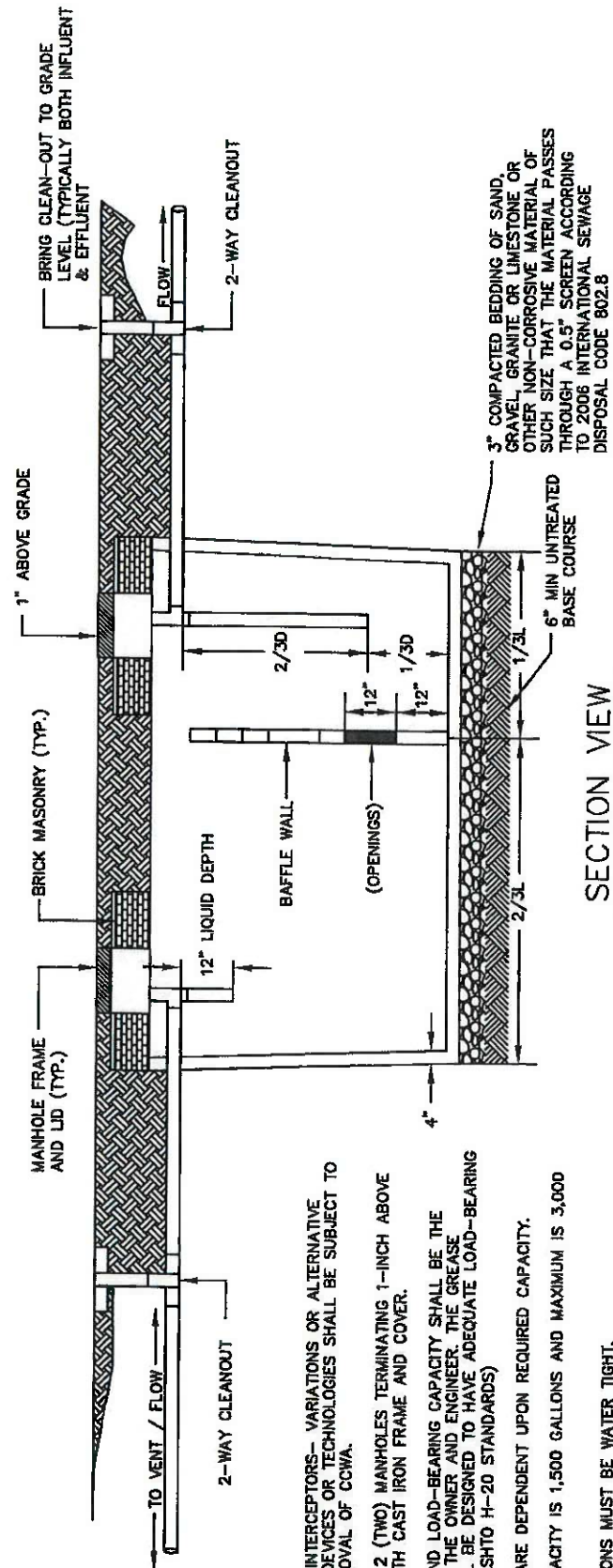
APPENDIX C

CCWA FOOD SERVICE GREASE INTERCEPTOR DETAIL

Sheet is on the following page.



PLAN VIEW



SECTION VIEW

DESIGN NOTES:

1. CONSTRUCTION OF INTERCEPTORS- VARIATIONS OR ALTERNATIVE GREASE REMOVAL DEVICES OR TECHNOLOGIES SHALL BE SUBJECT TO THE WRITTEN APPROVAL OF COWA.
2. ACCESS- PROVIDE 2 (TWO) MANHOLES TERMINATING 1-INCH ABOVE FINISHED GRADE WITH CAST IRON FRAME AND COVER.
3. WALL THICKNESS AND LOAD-BEARING CAPACITY SHALL BE THE RESPONSIBILITY OF THE OWNER AND ENGINEER. THE GREASE INTERCEPTOR SHALL BE DESIGNED TO HAVE ADEQUATE LOAD-BEARING CAPACITY. (PER AASHTO H-20 STANDARDS)
4. TANK DIMENSIONS ARE DEPENDENT UPON REQUIRED CAPACITY.
5. MINIMUM TANK CAPACITY IS 1,500 GALLONS AND MAXIMUM IS 3,000 GALLONS.
6. ALL PIPE CONNECTIONS MUST BE WATER TIGHT.
7. ALL BRACES, BRACKET NUTS, AND BOLTS MUST BE STAINLESS STEEL.
8. TANK FRAME AND LID MUST NOT BE SUBJECT TO FLOODING.

CLAYTON COUNTY WATER AUTHORITY

DETAIL TITLE:

FOOD SERVICE GREASE INTERCEPTOR

REVISIONS

No. BY DATE

DR. TL. CHX

SCALE

1" = NTS

DATE

AUG/24/2010

APPENDIX D

CCWA GREASE ENFORCEMENT RESPONSE PLAN

Sheets are on the following pages in this appendix.

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

Clayton County Water Authority Grease Management Program

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

Clayton County Water Authority Grease Management Program

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.

Clayton County Water Authority Grease Management Program

CCWA GREASE ENFORCEMENT RESPONSE GUIDE

<u>Noncompliance</u>	<u>Nature of Violation</u>	<u>Range of Response</u>
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.