Regional Fats, Oils and Grease (FOG) Control Program

FY2022 Annual Report
July 1, 2021 to June 30, 2022

Prepared By
East Bay Municipal Utility District
For Participating Collection System Agencies:

City of Alameda
City of Albany
City of Berkeley
City of Emeryville
City of Piedmont
Stege Sanitary District

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1. Program Background

The East Bay Municipal Utility District (EBMUD) conveys and treats wastewater generated by seven collection system Satellites: the Cities of Alameda, Albany, Berkeley, Emeryville, Oakland and Piedmont located in Alameda County, and the Stege Sanitary District, which serves the City of El Cerrito, a portion of the City of Richmond and the unincorporated community of Kensington in Contra Costa County. These Satellites (the "Satellites") own and operate their own sanitary sewer systems that collect wastewater generated from homes and businesses in these communities and convey the flows to EBMUD's large diameter interceptor. The interceptor sewers transport wastewater to EBMUD's Main Wastewater Treatment Plant (MWWTP) near the eastern anchorage of the Bay Bridge.

This Regional FOG Control Program was developed to control grease discharges from residents and food service establishments (FSEs) that discharge to the Satellites' collection systems. The program aims to to reduce FOG related SSOs and blockages and consists of FOG hotspot reporting and investigations, FSE and grease interceptor (GI) inspections, enforcement support, database management, and pollution prevention outreach. The EBMUD interceptor system has not had any fats, oils and grease (FOG) related sanitary sewer overflows (SSOs) due to the large diameter of its pipes.

During the course of FY2022, the program operated under a Scope of Services (Attachment 1). This report summarizes the program activities implemented during the course of FY2022.

2. Food Service Establishments

An FSE is any facility preparing and/or serving food for commercial use or sale. This includes restaurants, cafes, lunch counters, cafeterias, hotels, hospitals, convalescent homes, factory or school kitchens, catering kitchens, bakeries, grocery stores with food preparation and packaging, meat packing facilities and other facilities not listed above where FOG may be introduced into the community sewer system. To support effective FOG hotspot investigations, FSE listings are periodically updated to ensure the most current available information about FSEs. Detailed information about FSE listing updates is provided in Section 8. Table 1 shows the numbers of FSEs within each Satellite at the time this report was written.

Table 1: Number of FSEs per Agency

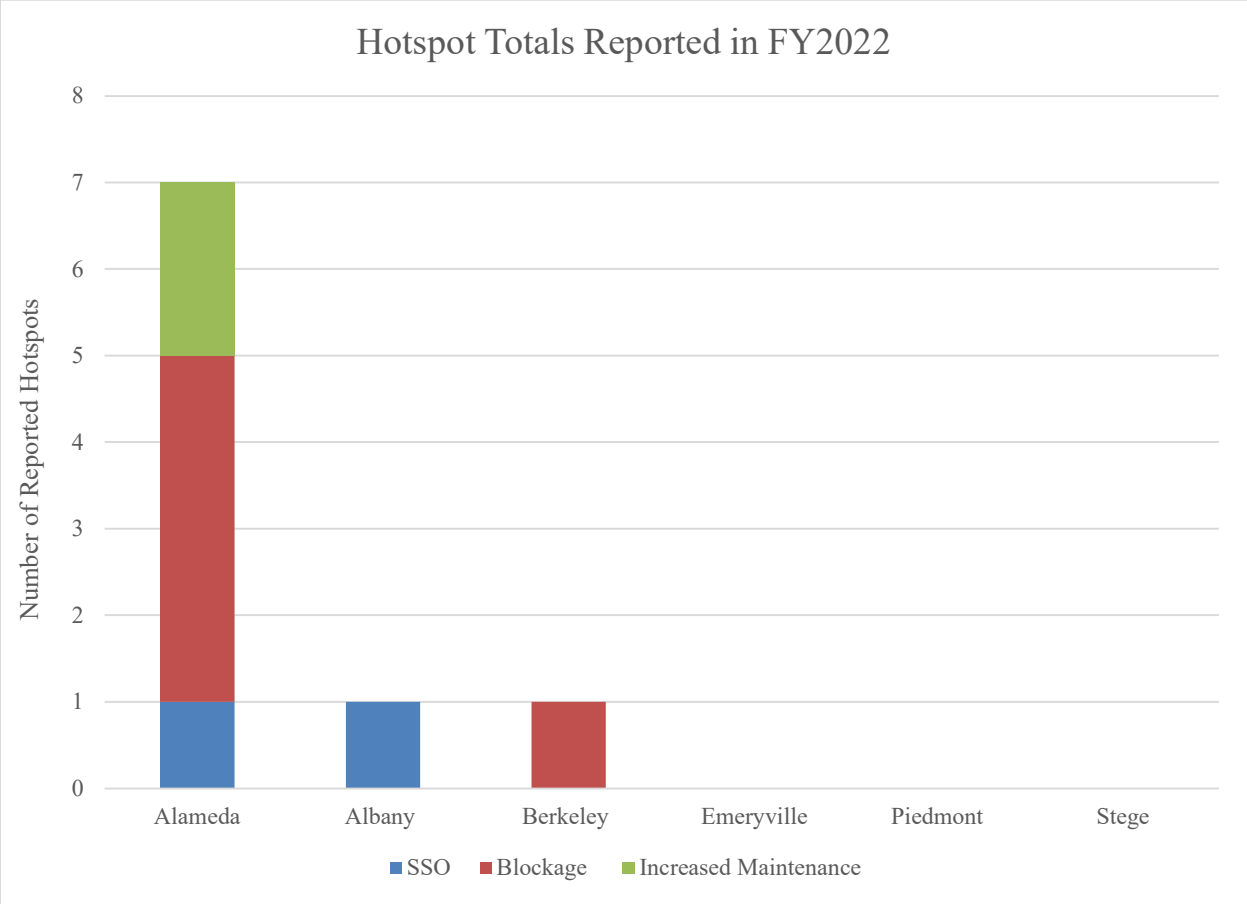
Agency	Number of FSEs
Alameda	356
Albany	98
Berkeley	937
Emeryville	139
Piedmont	3
Stege Sanitary District	182
TOTAL	**1,715**

3. Hotspot Investigations

FSEs and residential sites are potential sources of grease-related blockages, SSOs, or increased maintenance in the Satellites sanitary sewer collection systems. The collection system Satellites report locations of grease-related blockages, SSOs, or areas in need of increased maintenance due to grease build up to EBMUD. These are referred to as FOG Hotspots. Satellites complete FOG Reporting Forms for areas in which the agency wants EBMUD to conduct Hotspot investigations. Each hotspot investigation is initiated with the submittal of the FOG Reporting Forms by an agency. A sample FOG Program Hotspot Reporting Form is enclosed in Attachment 2.

For FY2022, the Satellites reported a total of 10 FOG-related hotspots to EBMUD as illustrated in Chart 1 below. As part of EBMUD's response to these hotpots, 151 outreach letters were mailed accompanied with the "Do not flush" and "Residential FOG" brochures, as well as a FOG scraper.

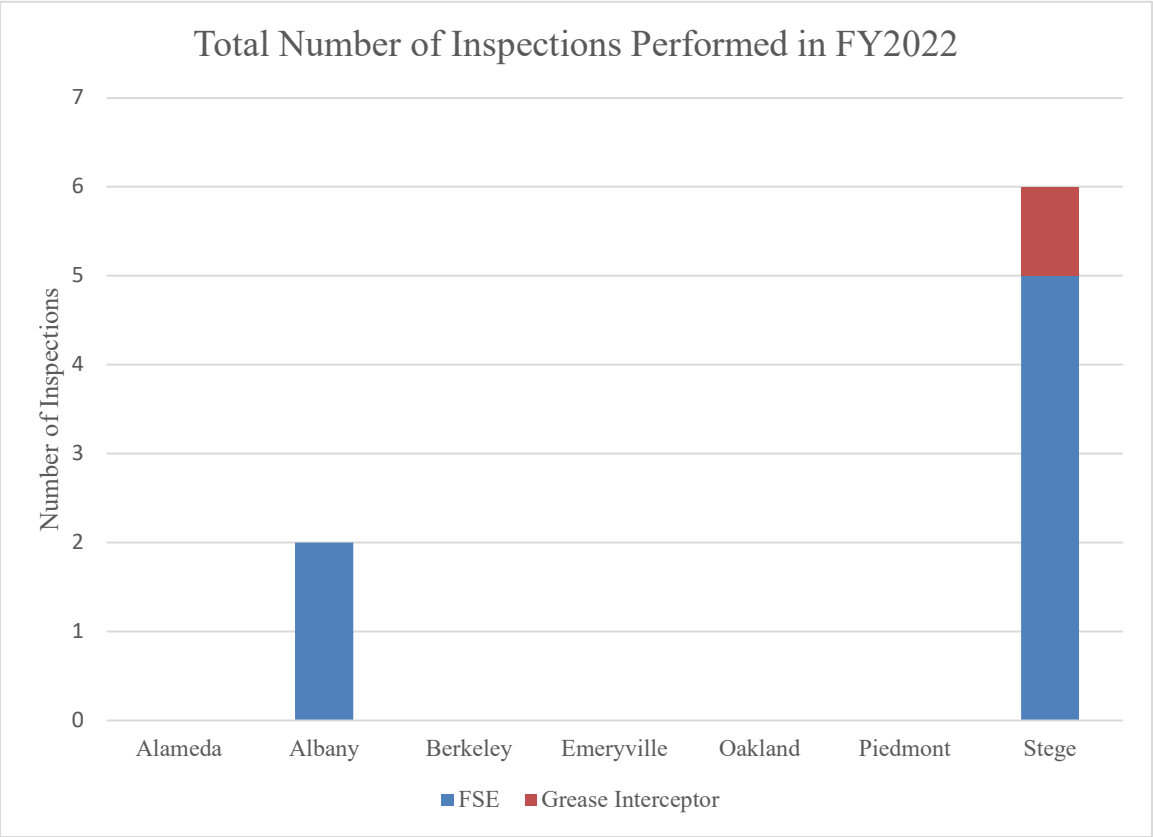
Chart 1: Hotspot Totals Reported in FY2022



In FY2022, EBMUD performed 8 inspections as illustrated on Chart 2. EBMUD performs FSE inspections in response to hotspot notifications (note, there are usually several FSEs near any given hotspot). In 2022, FSE inspections resumed after being on hold due to Covid 19 restrictions.Inspections, as shown in Chart 2, focused on areas where hotspots had been previously reported. EBMUD will complete additional FSE inspections from hot spots reported in FY2021 and FY2022 in FY2023. EBMUD conducts two different types of inspections:

> FSE Inspection: Performed to assess an FSE's grease generating capability, FOG handling procedures and Grease Control Devices (GCDs) in place. FSE inspections are performed in identified hotspot areas only. The overall goal is to determine if an FSE, due to its grease generating capability, has the potential to cause or contribute to sanitary sewer blockage, SSO or increased sewer maintenance.
>
> Grease Interceptor (GI) Inspection: Performed at FSEs with grease interceptors to determine their operating conditions and the adequacy of their maintenance schedule. EBMUD will require more frequent servicing/maintenance and repairs on behalf of the Satellites, if determined to be necessary.

Chart 2: Total Number of Inspections Performed in FY2022



4. Grease Control Device Requirements

FSEs that generate grease may cause or contribute to a blockage, SSO, or increased maintenance in the collection systemand are required to install GCDs.

A sample of the GCD installation requirement letter is included in Attachment 3. The process of GCD requirement, selection and approval is as follows:

- After receiving a GCD installation requirement letter, the FSE selects a GCD and confirms the GCD installation schedule with EBMUD within 60 calendar days of the receipt of the GCD requirement letter.
- EBMUD confirms the type of the selected GCD and provides a signed GCD Review Form (Attachment 4) to the FSE owner/operator and the agency.
- The FSE's owner/operator works with the Satellite collection system agency to obtain any necessary permits and installs the selected GCD in accordance with the agency's plumbing code and plan check procedures. The FSE should complete the installation within six months from the receipt of the GCD requirement letter.
- After a GCD is installed, EBMUD performs a follow up inspection and collects any relevant information about the GCD maintenance schedule.

FSEs are required to maintain GCDs according to the manufacturer's recommended frequency, or more often as necessary to control the discharge of FOG. A sample GCD Maintenance Requirement Letter is included in Attachment 5.

During the course of FY2022, no GCD maintenance requirement notices or GCD installation requirement notice to FSEs located in hotspots were issued.

5. Enforcement Support

FSEs that receive GCD installation requirements and do not respond and/or do not complete the GCD installation within six months may be subject to enforcement. If the FSE continues to be non-responsive to the GCD requirement, EBMUD sends a Non-Compliance Notice to the FSE and refers their case to the relevant Satellite for enforcement. A sample Non-Compliance Notice is included in Attachment 6.

EBMUD developed a GI Notice of Non-Compliance, which intends to document the GI Maintenance Requirements for FSEs with chronic issues that do not respond to email or phone requests. The goal is to document enforcement activities and strengthen the GI maintenance requirements for these FSEs. EBMUD provides copies of these notices to Satellites. A sample copy of this notice is included in Attachment 7.

6. Grease Control Device Variances

A GCD may not be required if an FSE can demonstrate that food preparation and service do not generate FOG due to the menu and kitchen equipment. EBMUD staff evaluates FSE's menu, equipment and food preparation practices on a case by case basis and provides recommendations to Satellites as to whether or not to grant a GCD Installation Conditional Variance for Facility Grease Generating Capability (Attachment 8). Selected examples of FSEs that may be granted a variance include the following:

a) FSEs without Type I hoods, deep fryers or other kitchen equipment indicating that grease is being used.
b) FSEs serving only beverages (tea/wine bars).
c) FSEs serving beverages and/or ready to eat, packaged or unpackaged items (with or without food warming).
d) FSEs serving precooked foods (meats, fish) defrosted in microwave or oven.
e) Snack bar with no food preparation other than food warming.
f) Bakeries with no food preparation other than food warming.
g) FSEs constructing and baking pizzas with precooked meats and toppings.
h) Other FSEs serving only pre-made foods with or without food warming.

When a variance is granted, EBMUD staff provides a GCD Installation Conditional Variance for Facility Grease Generating Capability Form to FSEs and to Satellites staff for their reference. However, this facility will be required to install an approved GCD to adequately handle the grease load, if:

- The FSE's menu/equipment (including food preparation operation) change to include grease generating items, and/or

- City/EBMUD determine that the FSE causes or contributes to grease related increased maintenance requirements in the sanitary sewer collection system, or grease related collection system blockage and/or sanitary sewer overflow.

GCD Installation Conditional Variances for Facility Grease Generating Capability are not transferrable and can be revoked by the Satellites, if deemed necessary.

In FY2022, one FSE applied for a GCD Installation Conditional Variance for Facility Grease Generating Capability and was approved for the variance.

7. Hotspot Reporting

EBMUD provides the collection system Satellites with quarterly FOG hotspot investigation reports. These reports list the number of hotspots reported and inspections performed, FSEs identified to cause or contribute to FOG related blockages/SSOs, GCD installation status, and a summary of residential outreach materials distributed during a given quarter.

8. FOG Control Database

EBMUD maintains a database to track and manage Regional FOG Program information including: FSE's grease generating capability, inspections, FOG hotspots, GCD requirements and agency enforcement information. Residential outreach letters distributed customers are also tracked in the database.

The FOG database is updated to ensure the most accurate data, which can then be used for FOG hotspot investigations. These sources include: FSE inspections, and data from Alameda County Environmental Health, Contra Costa County Environmental Health, and the City of Berkeley Environmental Health Departments.

9. FOG Outreach

Public education and outreach that promotes proper handling and disposal of FOG is an ongoing effort through various methods and media. As part of the hotspot response, EBMUD conducts outreach to FSEs and residents in identified hotspot areas. The following sections summarize activities associated with commercial and residential FOG outreach.

9.1 Commercial FOG Outreach

EBMUD provides education and outreach materials to FSEs in multiple languages as a component of the overall program. These materials are listed below and are available on EBMUD's website at http://www.ebmud.com/fog

a) Sample Grease Trap Maintenance Log
b) Discharge Prohibition Poster
c) Grease Interceptor Maintenance Flyer
d) Best Management Practices

EBMUD staff conducts targeted outreach to commercial FSEs, per Satellites request to educate and prevent FOG impacts to the community sewer.

9.2 Residential FOG Outreach

EBMUD educates residents on how to properly dispose of household cooking oil. This outreach effort includes hotspot response as well as non-hotspot related pollution prevention activities on local and regional levels.

Hotspot Response

EBMUD provides targeted outreach for residential customers where a FOG hotspot was reported by the Satellite. Each residential outreach packet includes informative residential FOG brochures. Residential FOG outreach materials are available on EBMUD's website at http://www.ebmud.com/fog and include:

a) Free FOG scraper
b) Residential FOG Brochure "Avoid a Clog - Keep Grease Out of Your Drain"

Additional outreach information for businesses and residents, including residential grease drop off locations, is also available on EBMUD's website.

Pollution Prevention (P2)

As part of the Regional FOG Control Program, EBMUD provides resources to conduct pollution prevention activities to educate customers on proper FOG disposal and other related best practices. In FY2022, EBMUD continued residential FOG outreach efforts by engaging the general public at community events, reaching out to multi-tenant residences, and collaborating with Satellites/non-governmental organizations. Details of these activities are provided below.

Community Events

Baykeeper – Clean Bay Challenge: April 2022

EBMUD was a sponsor for Baykeeper's Clean Bay Challenge working toward 1,000 hours cleaning up the San Francisco Bay.

California Coastal Cleanup Month: September 2021

EBMUD staff participated in the California Coastal Cleanup Month event, which encouraged the public to help remove trash and plastic pollution at beaches and waterways in their neighborhoods throughout the month, while observing social distancing due to the COVID-19 pandemic (Exhibit A).

Collaboration with Satellites on Outreach Efforts

Per the requests of the Satellite agencies, EBMUD continues to provide FOG outreach materials for the Satellites to distribute at their local events. Public education and outreach that promotes proper handling and disposal of FOG is an ongoing effort through various methods and media which include partnerships with regional non-governmental organizations and local retail outlets. During the course of FY2022, EBMUD:

- Supplied approximately 200 "What Not to Flush" brochures and 200 "Avoid the Clog" brochures to Stege Sanitary District for disbursement at their events.
- Supplied approximately 100 "Think Before You Flush" brochures and 100 "Avoid the Clog" brochures to the City of Alameda for disbursement at their events.
- Maintained the EBMUD-FOG residential disposal webpage, http://www.ebmud.com/fog with added link on resources page to www.baywise.org website for regional FOG disposal information.
- Continued to conduct FOG outreach at the local outreach events for residents and restaurants through independent retailers of turkey fryers and oil jugs and EBMUD's website. During the 2021 holiday season (October – December 2021), a total of 19 local stores participated in the annual FOG Outreach campaign.
- Continued the holiday FOG partnership with Baykeeper sharing proper disposal information for residents on the Baykeeper website and on EBMUD's website.
- Continued to distribute FOG scrapers to residents at no charge via EBMUD upon request.

FOG Outreach at EBMUD's Main Wastewater Treatment Plant Tours

In FY2022, EBMUD continued its Main Wastewater Treatment Plant (MWWTP) Tour Program. EBMUD resumed in-person tours by special request for middle and high school classes and other groups, as well as continued the virtual tour program began in 2020 as a response to Shelter in Place orders. In FY2022, approximately 49 tours were given to nearly 1,800 visitors. The goal is to educate and engage interested stakeholders and members of our community on our vital wastewater treatment process. Throughout the tour, visitors learn how we treat millions of gallons of wastewater each day and how they can play a role in helping to protect EBMUDs treatment facilities, its workers and the San Francisco Bay. Experienced tour leads engage visitors into discussion about pollution prevention topics, including FOG. Detailed information about the

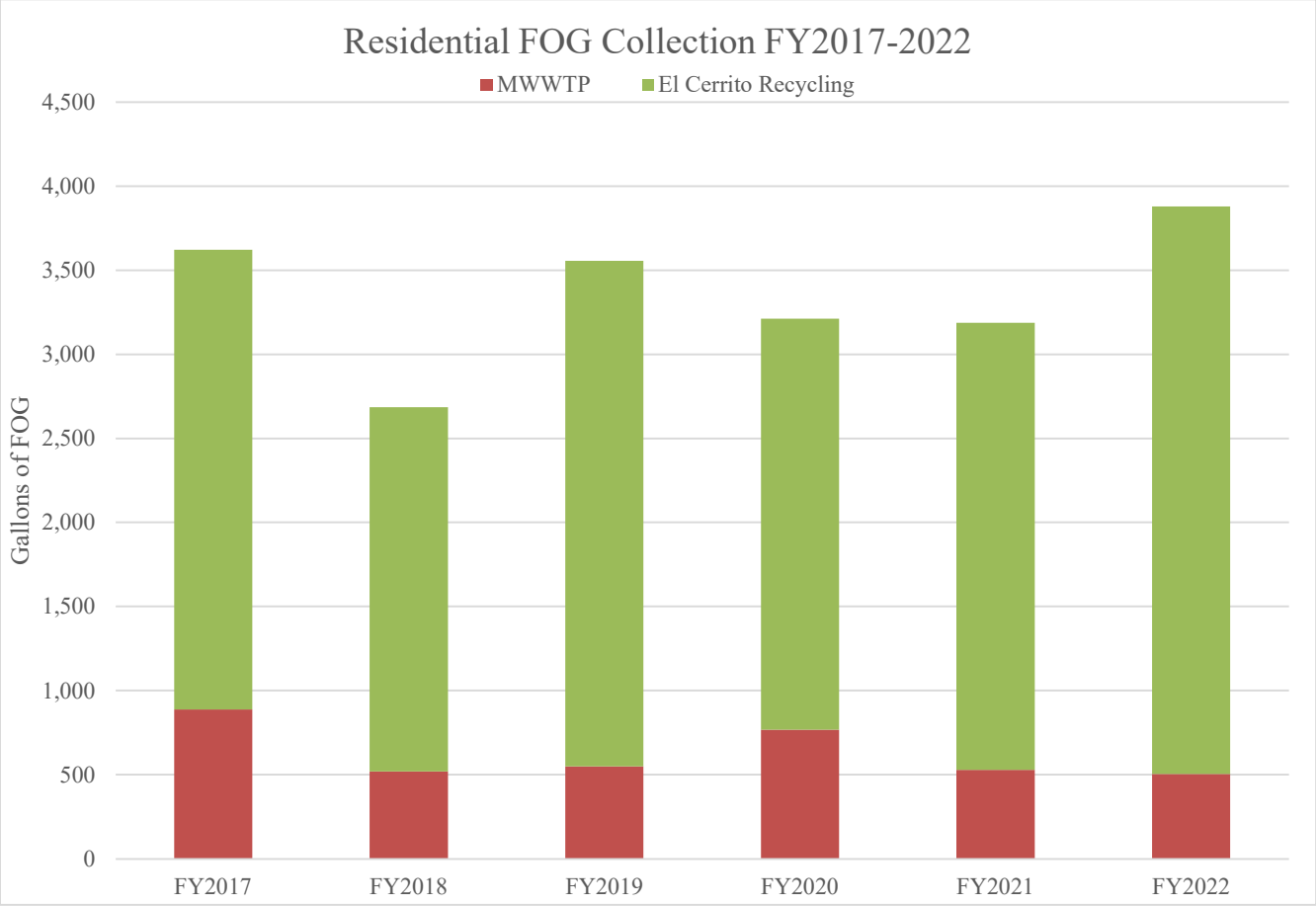
MWWTP Tour Program can be found at: http://www.ebmud.com/wastewater/collection-treatment/wastewater-treatment-plant-tours/.

10. FOG Disposal

EBMUD has established residential cooking oil and grease drop-off locations available to residential customers to dispose of their FOG. A complete list of on-going drop-off locations is provided on EBMUD's website: https://www.ebmud.com/wastewater/bay-friendly-waste-disposal/fats-oils-and-grease/residential-cooking-oil-and-grease-drop/

Chart 3 below shows the gallons of cooking oil that was collected at EBMUD's MWWTP and the El Cerrito Recycling Center. Both facilities recycle the collected cooking oil into a biofuel.

Chart 3: Residential FOG Collection FY2017-2022



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ATTACHMENT 1: SCOPE OF SERVICES

Scope of Services

The purpose of this Scope of Services is to continue ongoing FOG control activities to help reduce FOG related SSOs in the agencies' community sewer system. This Scope of Services clarifies the roles and responsibilities of EBMUD and the agencies in this collaborative effort and identifies the tasks to be conducted by each party.

The agencies authorize EBMUD to implement a regional FOG control program as described in this Scope of Services. To facilitate implementation of FOG control activities outlined in the scope of services, agencies will continue to provide EBMUD with the following information:

a) Completed grease SSO and blockage reporting forms for areas in which the agency wants EBMUD to conduct hotspot investigations;
b) Electronic and/or hard copies of community sewer maps that include manhole identification numbers and their locations, sewer pipes size, and flow direction.
c) Residential addresses, including apartment numbers, for hotspot areas in which the agency wishes FOG information to be delivered.

Termination

Any of the Parties may terminate its obligations under this Scope of Services by giving all other parties at least ninety (90) days written notice.

EBMUD's Scope of Services

EBMUD is the technical service provider for the agencies' FOG program requirements. EBMUD also leads inter-agency coordination for the regional FOG control program to maximize consistency and efficiency. EBMUD is responsible for the following activities:

1. FOG HOTSPOT INVESTIGATIONS

   (a) EBMUD will initiate an investigation after receiving a completed grease SSO and blockage reporting form from agency. The investigation will:

      1) Identify the sewer drainage basin contributing to the location of the blockage, SSO, or increased sewer maintenance (FOG hotspot area).
      2) Determine if the FOG hotspot area is in a residential, commercial, or combined residential/commercial drainage basin.
      3) Identify commercial FSEs that discharge in the sewer drainage basin.
      4) If FSEs are identified in the sewer drainage basin, the following field activities may be performed to identify FSEs that caused or contributed to the SSO, blockage, or increased sewer maintenance:
         - Field inspection of the FSEs
         - Grease interceptor inspection

2. GREASE INTERCEPTOR INSPECTIONS

   (a) EBMUD will perform periodic grease interceptor inspections for FSEs in hotspots as well as for FSEs that are not in hotspots.

3. RESIDENTIAL HOTSPOT RESPONSE
   (a) EBMUD will provide targeted outreach in identified residential FOG hotspots. Residential outreach information will be distributed based on the residential addresses, including apartment numbers, in identified hot spot areas based on agency's requests.

4. ENFORCEMENT SUPPORT
   (a) EBMUD will send notifications to FSEs based on agency-specific requirements. These notifications may include requirement letters, notices of non-compliance and other follow-up documents.
   (b) EBMUD will support agencies in any enforcement actions and proceedings taken by agencies (e.g. if agency initiates hearing, EBMUD will present findings of hotspot investigation).

5. REPORTING
   (a) EBMUD will submit to agencies quarterly FOG hotspot investigation summary reports. These reports include:
      i. A summary of all FOG hotspots that were investigated during the quarter describing the activities performed and the FOG hotspot status at the end of the quarter.
      ii. The number of inspections performed, FSEs identified to cause or contribute FOG related blockages/SSOs, GCDs confirmed to have been installed, and a summary of residential outreach materials distributed during the quarter.

6. FOG CONTROL DATABASE
   (a) EBMUD will develop and maintain a FOG control database that includes:
      i. FOG Hotspots identified by the agencies
      ii. FSEs identified in each FOG hotspot and grease control device/ grease interceptor information for each FSE in the FOG hotspots
      iii. FSE, grease interceptor inspections performed at FSEs and FOG hotspots

7. RESIDENTIAL AND COMMERCIAL OUTREACH
   EBMUD will maintain commercial and residential outreach and public education program activities, which may include bill inserts, billboards, outreach events, website development, and periodic direct communication with FSEs.

8. COMPENSATION
   The agencies will compensate EBMUD for the work conducted under Scope of Services items 1 – 7 of this Scope of Services.

ATTACHMENT 2: FOG PROGRAM HOTSPOT REPORTING FORM

GREASE SSO AND BLOCKAGE REPORTING FORM

EVENT NUMBER: _____ (EBMUD use)

COLLECTION SYSTEM INFORMATION

Date of Incident: _____ **Date of Report**: _____

☐ **Blockage** ☐ **SSO** ☐ **Increased Maintenance**

Contact Info

Agency Name: _____Agency Contact: _____

Agency Contact Phone Number: _____

Site Info

Name: _____

Reporting Address: _____Nearest Cross Street: _____

Hotspot Address (if different): _____

City: _____ Zip Code: _____

Upstream Structure Reference: _____Downstream Structure Reference: _____

1. Does this location have a history of grease blockages? ☐ Yes ☐ No

If yes,

2. Date of last incident? _____

3. Is it a known residential only area? ☐ Yes ☐ No

If yes, is it mostly multi-family or single family? ☐ Multi-family ☐ Single Family ☐ Both

Additional info attached: ☐ Line History ☐ Work report ☐ CCTV footage

☐ City Main Line ☐ Privately owned service lateral

☐ Lower lateral (agency responsibility) ☐ Other_____

Additional info available:

_____

Send notifications to:

Fax number: (510) 287-1530

E-mail: cleanbay@ebmud.com

EBMUD RESPONSE INFORMATION

Date received by EBMUD: _____ Received by: _____

Initial Review Response: ☐ Investigation ☐ Field Inspection

Response Details (Please attach additional detail sheets, if necessary)

_____

Report submitted by: _____ Date: _____

ATTACHMENT 3: SAMPLE GCD INSTALLATION REQUIREMENT LETTER

NOTICE OF GREASE CONTROL DEVICE INSTALLATION REQUIREMENT

Date

Name
Address
Berkeley, CA Zip

Dear Facility Owner:

Re: Grease Control Device Installation Requirement

East Bay Municipal Utility District (EBMUD) and the Satellites in its wastewater service area, including the City of Berkeley, developed a Regional Fats, Oils, and Grease (FOG) Control Program for commercial food facilities. This program was developed to decrease grease related sanitary sewer overflows and blockages that are associated with health risks and water quality impacts. The program requires installation of a grease control device at any grease generating food facility causing or contributing to a grease related collection system blockage requiring maintenance requirements and/or a sewage spill.

On February 1, 2018, EBMUD performed site inspection at [FSE Name]. The inspection confirmed that this food facility has grease generating capability and that grease discharges from this facility cause or contribute to grease related blockages in the City of Berkeley collection system. This letter serves as notice that [FSE Name], is required to install a grease control device (GCD) to control the discharge of grease from the restaurant. The next steps are described below.

Step 1: [FSE Name] shall select a type of GCD and confirm GCD installation process to the District within **60 calendar days** of the receipt of this letter. A guide on the program's grease control requirements and selected list of approved types of grease control devices are enclosed for your reference.

Step 2: [FSE Name] shall install the GCD in accordance with the City of Berkeley's plumbing code and plan check procedures. For any questions regarding the City of Berkeley's plumbing code and plan check procedures, please call (510) 238-3891.

Steps 1 and 2 above shall be completed within **6 months** from the receipt of this letter. Failure to complete the GCD installation requirement by the due date may subject FSE Name to enforcement actions. Enclosed are outreach materials for restaurants including best management practices, a grease trap maintenance log, "Do Not Pour" poster and FOG brochure. Please contact John Roberts of EBMUD at (510) 287-1039 if you have any questions.

Sincerely,

Adam Kern
EBMUD Supervising Wastewater Control Representative

ATTACHMENT 4: GREASE CONTROL DEVICE REVIEW FORM

Regional Fats, Oils and Grease (FOG) Control Program

Grease Control Device Review

I. Food Service Establishment Name:

_____

II. Food Service Establishment Owner Name/Contact Phone Number:

_____

III. Food Service Establishment Address:

_____

IV. Selected Type of Grease Control Device:

_____

NOTE: If your food service establishment (FSE) is determined to cause or contribute to grease related sanitary sewer overflow or blockage or any added maintenance in the collection system enforcement will be exercised in accordance with the local collection system's jurisdiction code. You will be required to implement additional controls including grease control devices with greater capacity to adequately handle the grease load.

V. EBMUD Review

Approved/Rejected By: _____Date: _____

Print *Signature*

Comments:_____

_____

VI. Collection System Agency Referral

The above FSE has selected the device identified in §IV (above). This device type meets the Regional Fats, Oils and Grease (FOG) Control Program Grease Control Device Requirements in §VII. Approval of the device type is hereby forwarded to:

VII. Grease Control Device Requirements

The Regional Fats, Oils and Grease Control Program provides for installation of grease control devices including grease interceptors and/or automatic grease removal devices at the food service establishments within EBMUD's wastewater service area. The definitions, installation and maintenance requirements are discussed below.

Definitions

- A grease interceptor (GI) is a device designed to intercept fats, oils and grease (FOG) from the wastewater discharge. GIs include, but are not limited to, gravity GIs and other types of GIs that require cleaning/servicing by a pumping company due to design or per manufacturer's specifications. All pumping shall be completed by an EBMUD approved grease hauler.
- An automatic grease removal device (AGRD) is designed to retain FOG from wastewater discharge. An AGRD automatically removes FOG from the wastewater stream and transfers it to an external container. AGRDs are typically installed inside and above ground.

Installation

- The food service establishment (FSE) shall receive approval from the appropriate collection system agency through the agency's plan check process for the design and sizing of the grease control device.
- All grease control devices shall be installed in accordance with the collection system agency's plumbing code and plan check procedures. All grease control devices shall be installed per manufacturer's instructions and specifications.
- The FSE shall provide the installation schedule to EBMUD and relevant collection system agency.

Maintenance

- All grease control devices shall be maintained per manufacturer's instructions and specifications or more frequently as necessary to ensure that the FSE's discharge does not cause or contribute to a grease related collection system blockage resulting in maintenance requirements and/or a sewage spill.
- GIs shall be maintained at a minimum frequency of once per three month period, or more frequently as necessary to ensure that the FSE discharge does not cause or contribute to a grease related collection system blockage resulting in maintenance requirements and/or a sewage spill. GIs require pumping by an EBMUD approved grease hauler to remove the captured FOG and solids.
- Emulsifiers are prohibited for wastewater that is discharged to grease control devices.

For more information about GCDs and/or the Regional FOG Control Program, please go to the following web site: www.ebmud.com/FOG or call EBMUD's Environmental Services at (510) 287-1651.

ATTACHMENT 5: SAMPLE GCD MAINTENANCE REQUIREMENT LETTER

GREASE CONTROL DEVICE MAINTENANCE COMPLIANCE REQUIREMENT

Date

Name
Address
Berkeley, CA Zip

Re: Grease Control Device Maintenance Compliance Requirement

Dear Facility Owner:

East Bay Municipal Utility District (EBMUD) and the Satellites in its wastewater service area, including the City of Alameda, developed a Regional Fats, Oils, and Grease (FOG) Control Program for food service establishments (FSEs). This program was developed to decrease grease related sanitary sewer overflows and blockages that are associated with health risks and water quality impacts.

On August 21, 2018, East Bay Municipal Utility District (EBMUD) performed an inspection at [FSE Name]. This inspection found that staff were unable to locate the grease control device maintenance records. **Please email the service records for your grease control device cleaning to FOG@ebmud.com for all services performed in 2018 and 2019. Additionally, please provide copies of your grease recycling collection service receipts (if applicable).**

As a reminder, all FSEs are required to maintain their grease control devices to ensure that the facility's discharge does not cause or contribute to a grease-related collection system blockage or overflow. All food service establishments with grease control devices in place need to (a) ensure proper operations, maintenance and performance; and (b) retain the maintenance records on site and ensure that the records are available to EBMUD and the collection system agency upon request. For a reference, I have enclosed the Grease Interceptor Maintenance Flyer, best management practices, grease trap maintenance log, and "Do Not Pour" poster. More information can be found at the following web link: http://www.ebmud.com/fog.

Please contact John Roberts of EBMUD at (510) 287-1039 or at cleanbay@ebmud.com if you have any questions.

Sincerely,

Adam Kern
EBMUD Supervising Wastewater Control Representative

ATTACHMENT 6: SAMPLE NON-COMPLIANCE NOTICE TO FSE WITH GCD INSTALLATION REQUIREMENT

NON-COMPLIANCE NOTICE
GREASE CONTROL DEVICE INSTALLATION REQUIREMENT

Date

Name
Address
Berkeley, CA Zip

Dear Facility Owner:

RE: Non-Compliance of Grease Control Device Installation Requirement

On [Date], East Bay Municipal Utility District (EBMUD) and the City of Berkeley provided you with a grease control device (GCD) requirement letter for [FSE Name] located at [FSE Address]. A copy of this letter is enclosed for your reference. EBMUD repeatedly contacted [FSE Name] via phone to follow up regarding the GCD requirement. To date, no progress has been made towards meeting the requirement.

This letter serves as a **Non-Compliance Notice** to [FSE Name] with the requirement referenced above. The case has now been referred to the City of Berkeley for enforcement action.

If you have any questions, please contact Diana Aikenhead (City of Berkeley) at (510) 981-7448.

Sincerely,

AdamKern
EBMUD Supervising Wastewater Control Representative

Enclosures

ATTACHMENT 7: SAMPLE NON-COMPLIANCE NOTICE TO FSE WITH GREASE INTERCEPTORS

NOTICE OF NON-COMPLIANCE

Date

FSE Name
Address
City, CA Zip

Re: Grease Interceptor at FSE NAME/ADDRESS

Dear Facility Owner:

East Bay Municipal Utility District (EBMUD) and the Satellites in its wastewater service area, including the City of Berkeley, developed a Regional Fats, Oils, and Grease (FOG) Control Program for commercial food facilities. This program was developed to decrease grease related sanitary sewer overflows and blockages that are associated with health risks and water quality impacts. The program requires that all food service establishments with grease interceptors (GI) in place maintain the pumping frequency of their GI at least once every three months or more often to ensure that the facility's discharge does not cause or contribute to a grease-related collection system blockage or overflow. All food service establishments with GIs in place need to (a) ensure proper operations, maintenance and performance of the GIs; and (b) retain the GI maintenance records on site and ensure that the records are available to EBMUD and the collection system agency upon request.

On DATE, EBMUD performed an inspection at FSE NAME/ADDRESS. This inspection was performed to check the condition of the GI and verify that the GI pumping frequency is adequate. The inspection found that the GI pumping frequency of once every three months is inadequate, because the combined thickness of the GI floating grease and the bottom solids exceeded 25 % of the total interceptor depth.

On behalf of the City of Berkeley, EBMUD is providing this requirement letter to FSE Name. FSE NAME is required to immediately increase the pumping frequency of the GI to **once every two months** to ensure that the facility's discharge does not cause or contribute to a grease-related collection system blockage or overflow**. Please provide the GI maintenance records and planned maintenance schedule to EBMUD's Environmental Services Division within 30 days of the receipt of this letter. EBMUD will perform a follow up inspection at** FSE NAME/ADDRESS **to verify the GI pumping frequency and observe the conditions of the GI.**

Please be aware that if your facility has been found to cause or contribute to a grease related sanitary sewer overflow and if your facility failed to follow up with the above requirement, you may be may be found in violation of the Federal Clean Water Act and subject to fines up to $10,000.00 per day.

Enclosed are outreach materials for restaurants including best management practices, GI maintenance flyer, and "Do Not Pour" poster. For more information, please visit EBMUD's website at: www.ebmud.com/fog

Please contact John Roberts at (510) 287-1039 if you have any questions.

Sincerely,

Adam Kern
EBMUD Supervising Wastewater Control Representative

ATTACHMENT 8: GCD INSTALLATION CONDITIONAL VARIANCE FOR FACILITY GREASE GENERATING CAPABILITY

East Bay Municipal Utility District Environmental Services
P.O. Box 24055, MS 702
Oakland, CA 94623-1055
Telephone (510) 287-1651 Fax (510) 287-1530

Grease Control Device Installation Conditional Variance for Facility Grease Generating Capabilities

I, _____
(Business Representative's Name Printed)

Representing _____
(Business Name and Address Printed)

certify that at no time shall any fats, oil, grease, or solids be discharged to the community sewer collection system in quantities that impair wastewater flow. I agree to contact EBMUD Environmental Services if operational changes occur that result in the increase of fats, oil, grease, or solids discharge to the community sewer collection system at the business named above. If at any time the business listed above changes menu/equipment/food preparation practices to include grease generating items, and/or is found to discharge fats, oil, grease, or solids in quantities that impair wastewater flow, I understand that I must install, within hundred eighty (180) days of receipt of notification from EBMUD, a grease control device of sufficient size and design to be acceptable to the collection system owner and the regulating Health Department.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.
The grease control device installation conditional variance is not transferable.
The person signing this variance warrants that it has or has obtained the necessary consent and authority to execute this variance and to make this variance binding upon itself.

SIGNED _____DATE _____

CONTACT PHONE NUMBER _____

Supporting documentation including but not limited to menus, kitchen equipment, and kitchen practices to limit grease discharge to the sewer must be submitted with this application form.

Applicant Please Do Not Write Below This Line

APPROVED: _____
EBMUD REP
PRINT SIGNATURE
DATE _____ CONTACT NO. _____

REASON FOR APPROVAL: _____
CITY/AGENCY REP _____ DATE _____

REJECTED: _____
EBMUD REP
PRINT SIGNATURE
DATE _____ CONTACT NO._____

REASON FOR REJECTION: _____

CITY/AGENCY REP _____DATE _____

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List of Exhibits

Exhibit A California Coastal Cleanup Day: September 18, 2021

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Exhibit A
California Coastal Cleanup Month