

# MILWAUKIE

*Dogwood City of the West*

City of Milwaukie  
Public Works Department

## FACILITY INSPECTIONS FOR FATS, OILS AND GREASE PROGRAM





Standard Operating Procedure #20.04

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By

Rob Livingston  
Environmental Service Coordinator

Approved:

	
Public Works Director	Date
	
Stormwater/Wastewater Supervisor	Date

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## 1.0 PURPOSE & APPLICABILITY

The purpose of this Standard Operating Procedure (SOP) is to establish uniform procedures pertaining to the preparation for, the performance of, and the reporting of Fats, Oils and Greases (FOG) inspections as performed by the City of Milwaukie Public Works Department. The inspections are conducted as a City initiated program to reduce the occurrence of sanitary sewer overflows (SSO) in order to protect the public and the greater environment from contact with raw sewage. These inspections satisfy the measurable goals identified in the City's Stormwater Management Plan pertaining to inspecting industrial and commercial facilities, and the requirements in Schedule A.4.b of the NPDES MS4 Stormwater permit issued to the City of Milwaukie by Oregon Department of Environmental Quality.

The policies and procedures of this SOP are applicable to City of Milwaukie personnel involved in the planning, preparation, conducting, and reporting of inspecting Food Service Facilities (FSF) within City of Milwaukie city boundaries.

The inspector may deviate from these procedures when necessary due to unexpected or unique circumstances that may occur in the field. Any deviation must be explained in the report generated during the inspection.

## 2.0 METHOD SUMMARY

The inspections are performed as a means of evaluating the compliance of FSFs with the City of Milwaukie's Fats, Oils and Greases (FOG) program, MMC 13.12.063. Inspections of FSFs may occur during the workweek of Milwaukie Public Works staff or after hours if an inspector needs to be present during a trap/interceptor cleanout. Inspectors may also collect pump-out reports sent from the rendering companies hired by FSFs to perform contracted cleanings. These reports may substitute for visiting the FSF in person as they contain the necessary data required by COM for GRD cleaning identified in Procedural Steps 7.2.1 and 7.2.2.

## 3.0 DEFINITIONS

- 3.1 Food Service Facility: any business which prepares and/or packages food or beverages for sale or consumption, on or offsite, with the exception of private residences
- 3.2 GRD: grease removal device, either a hydro mechanical interceptor (trap) or a gravity grease interceptor

## 4.0 HEALTH & SAFETY CONCERNS

Safety concerns are minimal for these inspections. Inspectors may encounter slippery kitchen floors. Proper footwear should be worn and the inspector should be aware that grease or oils may be present temporarily during a grease trap pumping. Also foul odors will certainly be present.

## **5.0 PERSONNEL QUALIFICATIONS**

Inspections will primarily be performed by the Environmental Services Coordinator, but may also be performed by other Public Works staff in the absence of the Coordinator. City staff performing inspections need to be familiar with the operation and maintenance of grease removal devices and the requirements of the FOG program; MMC 13.12.063.

## **6.0 EQUIPMENT & SUPPLIES**

The inspector needs to have sufficient FOG program inspection forms and a pen to fill them out with. A digital or cell phone camera should be carried to document the condition of the grease removal device during a pumping of the trap/interceptor or to capture the general state of the facility both inside and out. A tape measure or ruler should be used to confirm the thickness of the grease layer and the depth of the solids within the trap.

## **7.0 PROCEDURAL STEPS**

7.1 Before performing site visits at FSFs, staff will review the schedule of FSF dates for the facilities that are due for cleaning that month. This document is known as the "Milwaukie PW FOG Report" that lists all FSFs and their cleaning schedules with due dates. Inspectors should approach the facility a few days after the due date shown on the schedule to allow time for the cleaning to occur.

7.1.1 Inspectors will perform the site visits to the facilities during normal business hours, but should not inspect the premises during busy times such as during the lunch rush. The inspector will present appropriate credentials to the facility owner/manager/staff and ask to see the job ticket or receipt for the cleaning of the facility's grease removal device (GRD). If the work has been completed and a receipt is produced, the inspector will complete the FOG inspection form with all applicable data, (date, pumper, etc.) forecast a new due date based on the schedule (cleaning interval) and the last cleaning date and give the duplicate copy to facility staff.

7.1.2 If the GRD has not been serviced by the date shown on the "Milwaukie PW FOG Report", the inspector will complete a FOG inspection form with instruction for the facility to have their GRD cleaned within 7 days and issue the duplicate copy to the facility. If after/before this deadline the GRD has been serviced and proper documentation is presented to the inspector, the inspector will complete a FOG inspection form with a new forecast due date and issue a duplicate to the facility.

7.1.3 If after two consecutive 7 day notices are issued to the facility and the GRD has still not been serviced, the inspector will issue a Notice of Violation to the facility and send a copy of the inspection report to the City of Milwaukie Code Compliance Division for an enforcement action to be initiated against the facility.

7.2 During inspections that occur where the inspector is present when the GRD is being cleaned, the inspector will confirm with the pumping technician the thickness of the grease layer and the depth of the solids in the GRD. These dimensions can be calculated against the total depth of the GRD to arrive at a percentage of contents (grease + solids) to total depth of the GRD. If the calculation determines the contents constitute greater than 35% of the total depth of the GRD over successive cleanings, the inspector may increase the cleaning frequency of the

facility's GRD and adjust the schedule. The facility would be informed of this alteration via written notice.

7.2.1 Should the inspector notice any deficiencies in the facilities GRD condition, it will be noted on the inspection form and the facility will be made aware of the problem. The facility will be given a time line for repair or replacement for the GRD. Deficiencies should be well documented with supporting photographs.

7.3 Inspectors will also observe the conditions found at the facility regarding stormwater quality issues: Waste oil containers must be covered and not leak. Solid waste containers must be covered and not leak. Mop water must be discharged to the sanitary sewer and not dumped outside the building or into storm drains. Exhaust hood fans must not discharge airborne oils or greases that may deposit FOG onto roofs where rainfall runoff may carry FOG into storm drains. The facility shall not wash kitchen items outside where wash waters may contact the storm system. If any conditions exist at the facility where stormwater runoff may be contaminated by contact with kitchen waste of any kind or violates City of Milwaukie stormwater rules and regulations, the facility will be notified in writing and required to rectify the situation or be subject to an enforcement action by the City.

## **8.0 RECORDS MANAGEMENT**

- 8.1 Each inspection will generate an inspection report. The facility owner/manager will receive the duplicate copy at the end of the inspection. This is to be retained at the facility for at least three years.
- 8.2 The inspector will enter all information from the field report into the Hansen database and complete the work order that was generated by the program. After completing the work order, staff will file the report hard copy in the appropriate binder for the year being monitored. The report hard copies will be retained in accordance with the current City of Milwaukie records retention policy and Oregon Administrative Rules 166-200-0120(7).
- 8.3 In the event COM PW receives a pump-out report for a FSFs GRD service, this can substitute for a site visit inspection as mentioned in the Method Summary. The work order process will remain the same as procedural step 8.1.2. The FSF will not receive a copy of the pump-out report.

## **9.0 REFERENCES**

- 9.1 City of Milwaukie Municipal Code 13.12.063 Fat, Oil and Grease Control
- 9.2 NPDES MS4 Discharge Permit # 101348 (March 16, 2012) Oregon Department of Environmental Quality
- 9.3 City of Milwaukie Stormwater Management Plan (2012) Brown & Caldwell and City of Milwaukie

**Revision Record**

Revision	Date	Author	Description of change