

Dear Corporate Food Service Establishment Representative,

This letter is to inform you of a regional effort to develop Fat, Oils, and Grease (FOG) Abatement Programs in response to the Special Order by Consent issued by the Virginia Department of Environmental Quality in 2007. The programs in the cities and counties in the southeastern region of Virginia are currently in various stages of FOG program development. Some areas are stilling adopting ordinances while others are already at the inspection and enforcement stage.

We would like to encourage you to educate your employees/franchise owners about these ordinances just as they are made aware of health department and fire marshal requirements.

The following is a brief overview of the requirements of Food Service Establishments (FSEs). *Please be aware that requirements may vary by locality.*

- FSEs are responsible for having personnel on staff that have been certified through the online course: "Food Service Establishment Employee Regional FOG Training Program." This course is offered online for free by the Hampton Roads Planning District Commission through the following website: [www.hrfog.com](http://www.hrfog.com).
- FSEs may also be required to register their Grease Control Devices (GCDs). These are grease traps or grease interceptors that are part of the plumbing system designed to separate grease and solids from the kitchen waste water before it flows into the sanitary sewer system.
- GCDs are required to be kept in good repair and maintained by periodic cleanings which could range from a daily action to a maximum of 12 weeks. Cleaning frequency is based on the type and size of the device, FSE menu, volume of waste, and kitchen BMP practices.
- GCDs are required to be kept properly cleaned and in good repair. Proper cleaning requires the unit to be below 25% capacity; this may require cleaning on a daily to quarterly basis depending on the type and size of the device, menu, volume of waste, and kitchen BMP practices. FSEs are required to maintain cleaning and maintenance records for GCDs. These records must be kept on file at the FSE location for at least 3 years.
- Records for the pick-up of rendering oil (used fryer oil) must also be kept for 3 years.

Common discrepancies that have been documented during FOG inspections include:

- No FOG certified personnel on staff
- Grease Control Device not properly maintained (frequency of cleaning not adequate to keep grease/solids below 25% total volume)
- Grease Control Device not properly maintained (broken/damaged, missing pieces, improperly installed)
- Used cooking oil area dirty/messy, spills not cleaned up, open to the environment
- Records for used cooking oil not available for past 3 years
- Records for Grease Control Device maintenance/cleaning not available for past 3 years
- Records for Grease Control Device incomplete or inaccurate
- Kitchen staff not aware of Better Management Practices or FOG Program

Establishment of a well-run FOG program will not only protect the environment, it can reduce operational costs as well. It is important that corporations be aware of the program details and assure that each food service location is properly trained on the regulations. Training should be a part of the Standard Operating Procedure.