

- Regionally-consistent submittal process & documentation
 - Appendix A – Determining sizing and applicability
 - Appendix B – Alternate GCD unit approval (GGI, AGRD)
 - Appendix C – Self-cleaning request
 - Utility has the discretion to approve self-cleaning for units larger than 25gpm
- B & C provide the ability for the utility to provide exemptions
 - *While we are increasing requirements, these updates include flexibility for utilities to work with FSEs on a case-by-case basis*

SECTION 4 > MODEL FOG ORDINANCE PROPOSED CHANGES

- **Updated terminology**
 - Definitions (“commissary”, “decanting”, “mobile food units”, etc.)
 - “Grease control device” standard language, removing “grease trap” references
- **Registration Process**
 - GCD registration required to obtain a business license and/or Certificate of Occupancy. *Required as a means to identify FSEs for inclusion in FOG programs.*
 - *Easy to identify a new FSE vs. finding them after occupancy without a properly sized GCD (or none installed at all). Avoids retrofitting scenarios.*
 - GCD installation should be verified by a FOG inspector prior to issuance of a CO since GCDs are not routinely checked/verified by plumbing inspectors
 - Provide example of “deli to BBQ”
 - FSE X opened with an undersized GCD, now they are causing a grease issue
- **GCD Installation & Product Standards**
 - Requiring installation of GCDs that meet certain product standards (ASME, PDI G101, CSA) eliminates installation of inefficient GCDs
 - Reference to updated regional GCD sizing standards
 - Safety - GCD covers should meet load-rating requirements to prevent falls
 - *GGI examples of kids falling in*
- **GCD Cleaning Requirements**
 - Limit self-cleaning of smaller GCDs (25gpm and under)
 - Not cleaned frequently enough
 - Cleaned improperly
 - Improper re-assembly
 - Improper disposal – *(Liquid waste, if not properly absorbed, placed in dumpsters results in grease spills/waste leaking from dumpsters or used oil containers being crushed and resulting in negative environmental/stormwater impacts.)*
- **Hauler Oversight**
 - Section was added to be sure grease haulers are following best practices
 - No decanting
 - No prohibited discharges (sanitary or stormwater systems)
 - Record-keeping: providing adequate documentation of pump-out and discharge
 - Proper sampling at each service
 - Inspecting/providing GCD condition assessments

- Yellow grease rendering companies - record keeping & proper labeling of storage containers
- **Enforcement**
 - Corrective action for both FSEs and Haulers
 - Non-compliance should not be cheaper than compliance (Each day of failure to comply is considered an additional violation)

SECTION 5 > Recommended update to VDHCD VADEQ MOA

- Exemption for GCD sizing in the MOA coordinating jurisdictional responsibilities of the VA Uniform Statewide Building Code, SCAT regulations, and the Water Reclamation and Reuse Regulation (WR&R).

3. Building Sewers

A. Where the wastewater from the building or structure flows by gravity to the building sewer, which is or will be connected to a public or private gravity sewer, the jurisdiction of the Code shall apply to the building drain, building sewer, and all other appurtenances up to the point of connection to the public or private gravity sewer.

Exception: Grease Control Devices installed at commercial food service establishments shall be subject to the requirements of the SCAT Regulations.

- By advocating for this exemption, GCD sizing would default to the locality's FOG ordinance instead of the plumbing code that does not protect sewer infrastructure against FOG. *This change would prevent one city department from negating the efforts of another.*

SECTION 6 > Positive Impacts for All Involved

- **How will these proposed changes impact FSEs?**
 - Current FSEs
 - Increase in cleaning costs to those currently self-cleaning units >25gpm who do not get approval to continue
 - Improperly sized GCDs may require more frequent cleanings
 - Fewer backups and shut-downs (less revenue lost)
 - More durable GCDs, preventing early/more frequent replacement
 - 10 year – lifetime guarantee
 - Less potential for retrofits
 - Reduced maintenance (and associated costs) due to reduced GCD cleaning frequency
 - Potentially moving from weekly cleanings to quarterly
 - Improved compliance – less frequent intervention
 - “Future proofing” – change of ownership has less impact on high efficiency GCDs
- **How will these proposed changes impact localities?**
 - Consistent regional best management practices for FOG reduction
 - Uniform expectations for FSEs and haulers servicing FSEs
 - Reduced hydrolysis, backups/spills
 - Reduced repairs and maintenance costs
 - Increased compliance/customer satisfaction
 - Improved environmental stewardship

SECTION 7 > NEXT STEPS

- **Endorse amended regional model ordinance and GCD technical standards**
 - *Adopt/amend locally as you see fit*
- **Advocate for MOA change**
 - *More info on how we do this TBD*