The City of San Clemente (CSC) is responsible for the sanitary sewer collection and maintenance within its jurisdiction. A regular maintenance program to clean and clear the sewer mains is part of the regular operation of the sanitary sewer system. Most sanitary sewer spills are caused by blockages resulting from the introduction of fat, oil and grease, mainly from food service facilities, into the sanitary sewer system. These blockages can take place on private property or within the public right of way, resulting in impact to the environment, causing beach closures and resulting in fines to the responsible agencies. Additionally, such blockages can result in damage to both public and private property and can result in the release of polluted material into storm drain systems that ultimately dump into streams and the ocean. These spills can significantly impact quality of life and may subject the City to fines related to National Pollutant Discharge Elimination System (NPDES) permit, State Waste Discharge Requirement Permit or both. The City drains into Pacific Ocean, which is an impaired water body for pathogen bacteria. As a result, the State expects any agency discharging into the ocean to take aggressive actions to prevent any source of bacteria from entering it. In addition, fines increase as this is an impaired water body. The City has been running an aggressive inspection and maintenance program to prevent any spill from taking place, which has been successful, but costly.

Restaurants and food service facilities have been identified as a significant source of FOG discharges. It is common practice for sewer agencies to require food service facilities to install grease control devices in an effort to prevent FOG from entering the sanitary sewer system. These grease control devices have had varying degrees of success. One of the critical issues has been maintenance. Failure to adequately maintain or clean these devices and improper discharge of wastewater into the devices can result in FOG entering the sewer system and sewer system blockage.

While the discharge of FOG is typically a sanitary sewer issue, the link to blockages and spills has resulted in an increased emphasis from water quality regulatory agencies. In 2002, the San Diego Regional Water Quality Control Board adopted new NPDES restaurant inspection requirements designed to eliminate illicit discharges to the storm water system. As part of that program, local inspectors are required to check service and maintenance records for food facilities with grease interceptors. The proposed City ordinance requires the installation of grease control devices for all new and significantly remodeled food facilities and provides water quality inspectors with the authority to inspect for maintenance requirements and FOG issues.

The proposed San Clemente ordinance has been developed with input from neighboring jurisdictions. The ordinance is intended to address the following key issues:

* **Grease Control Device Required –** All new and remodeled food facilities, as defined, would be required to install interceptors to trap FOG on-site before it enters the public sewer system. An exemption process is included when placing a grease interceptor is not physically feasible.
* **Waste Water Additives –** Food Facilities would be prohibited from using wastewater additives for the purpose of emulsifying FOG without written approval of the City.
* **FOG Control Guidelines –** ACity Fog Control Manual would be established, to address:
  + - A 5 year permit process for all existing and new food service facilities.
    - Design, construction and inspection standards for Grease Control Devices.
    - Management, operation and maintenance standards for Grease Control Devices.
    - Kitchen Best Management Practices (BMPs) to prevent FOG from entering the sewer and storm water systems.
    - Standards for the collection and disposal of FOG by appropriate entities.
    - Requirement for in-door retention of yellow grease for all new facilities,
    - Training requirement for food facilities staff.
* **Maintenance Requirements –** Amaintenance program that will set out Grease Control Device cleaning frequency minimum requirements based on the food facility and the type of cooking equipment utilized therein will be required.
* **Food Grinders prohibited –** Food grinders will be prohibited in new Food Facility development and in instances where an existing facility proposes a “Change in Operation” or “Remodel” as defined by this ordinance, unless specifically authorized in writing by the City.

The ordinance describes the enforcement process, the appeal process and the exemption processes.

The specific of each of the above referenced items, administrative elements and findings are included in the body of the draft Ordinance text.

Fats oils and grease (FOG) discharges have been determined to be a significant cause of sewer blockages that result in sewer spills that ultimately reach local receiving waters and negatively impact water quality. The proposed ordinance establishes requirements to eliminate FOG from the sewer system. These requirements include provisions for grease control devices in new and remodeled food service facilities, inspection procedures, maintenance schedules and discharge standards.