



September 14, 2007

Acting Director of the Division of Enforcement  
Department for Environmental Protection  
300 Fair Oaks Lane  
Frankfort, KY 40601

Chief, Environmental Enforcement Section  
Environmental and Natural Resources Division  
U.S. Department of Justice  
PO Box 7611  
Washington, DC 20044-7611  
DOJ Case No. 90-5-1-1-08591

Chief, Water Program Enforcement Branch  
Water Management Division  
U.S. Environmental Protection Agency, Region 4

Re: Consent Decree Case No. 2:05-cv-00199-WOB

Dear Gentlemen:

Pursuant to Sanitation District No. 1's (District) Consent Decree, a Grease Control Program is required to be submitted separate from the Capacity, Management, Operation and Maintenance ("CMOM") Self-Assessment. The deadline for submission of the Grease Control Program is October 18, 2007:

**36(a). SPECIFIC CMOM PROGRAM DEVELOPMENT – GREASE CONTROL PROGRAM.** In addition to the Self-Assessment provided above, the District shall also specifically submit to the Cabinet/EPA for review and joint approval within six (6) months of entry of this Consent Decree a Grease Control Program. The Grease Control Program shall include a schedule for the development and enforcement of grease control measures to assure that grease accumulations are not restricting the capacity of the Sewer System contributing to SSOs. At a minimum, the Grease Control Program shall include the requirements set forth on Exhibit C.

In addition, the District is required to submit a Pump Station Plan that outlines remediation measures to eliminate SSOs at specific pumps stations outlined in Exhibit E of the Consent Decree. The deadline for submission for the Pump Station Plan is also October 18, 2007:

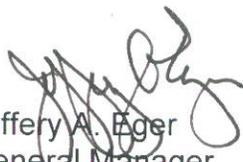
**38. PUMP STATION PLAN.** Within six (6) months of entry of this Consent Decree, the District shall submit to the Cabinet/EPA for review and joint approval a plan to identify watershed projects to eliminate SSOs at the pump stations identified on Exhibit E (the "Pump Station Plan"). The Pump Station Plan shall include expeditious schedules for design, initiation of construction, and completion of construction of remedial measures; provided, however, that such schedules shall not extend beyond the dates set forth on Exhibit E. The District shall provide an annual report within twelve months of approval of the Pump Station Plan on implementation of these watershed projects. Thereafter and until such projects are complete, the District shall provide an annual report on its implementation progress within sixty days after each anniversary date of the initial report.

The District has completed both the Grease Control Program and Pump Station Plan and has enclosed these submittals for your review and approval. A certification as required by the Consent Decree is also enclosed for each report (Consent Decree paragraph 38). The Cabinet and EPA have 90 days from receipt to review submittals unless the District receives notification before the expiration of the 90-day period that review will take longer (Consent Decree paragraph 44).

I am confident in the integrity of the enclosed documents and I am certain that the content of each not only satisfies regulatory requirements, but also helps further the mission and vision of the District by establishing aggressive, proactive, achievable measures to protect water resources and enhance the quality of life in Northern Kentucky.

I look forward to receiving your comments in the near future. If you have any questions or concerns, do not hesitate to contact me at 859-578-7465 or by e-mail at [jeger@sd1.org](mailto:jeger@sd1.org).

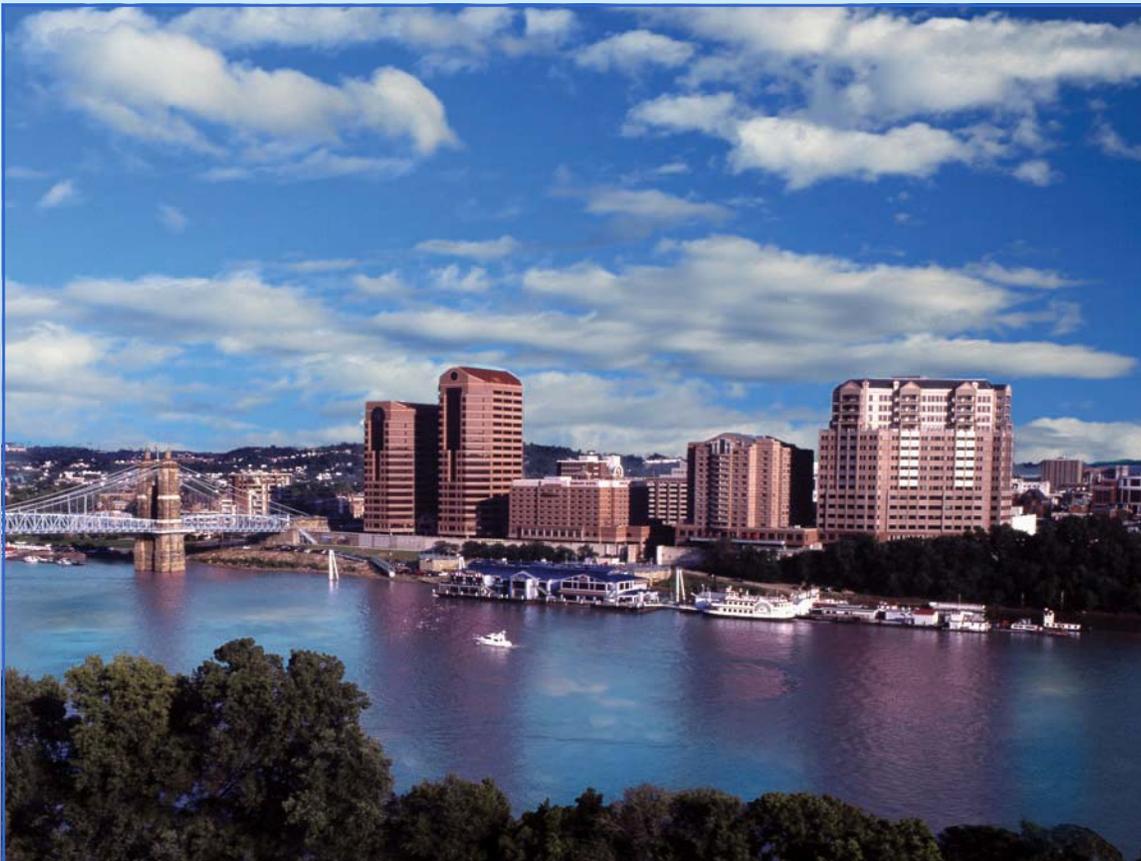
Best regards,

  
Jeffery A. Eger  
General Manager

JAE/mm  
Enclosures

# Grease Control Program: Proposed Phased Implementation Plan

Sanitation District No. 1  
September 17, 2007

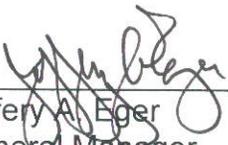




CERTIFICATION

GREASE CONTROL PROGRAM  
Consent Decree Case No. 2:05-cv-00199-WOB

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 such 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.

  
\_\_\_\_\_  
Jeffery A. Eger  
General Manager

September 14, 2007  
Date

COMMONWEALTH OF KENTUCKY

COUNTY OF Kenton )ss.

The foregoing instrument was acknowledged before me this 14 day of September, 2007 by Jeffery A. Eger, General Manager of Sanitation District No. 1.

  
NOTARY PUBLIC

Stute Lunge County, Kentucky

My commission expires: May 9, 2010

# **GREASE CONTROL PROGRAM**

## Proposed Phased Implementation Plan

September 17, 2007



**Sanitation District No. 1**  
1045 Eaton Drive  
Ft. Wright, KY 41017

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## LIST OF ACRONYMS AND ABBREVIATIONS

BMP	Best Management Practices
Cabinet	Kentucky Environmental and Public Protection Cabinet
CMOM	Capacity Management Operation and Maintenance
District	Sanitation District No. 1
US EPA	United States Environmental Protection Agency
ERP	Enforcement Response Plan
FOG	Fats, Oils and Grease
FSE	Food Service Establishment
GBA	George Butler Associates (information tracking system)
KRA	Kentucky Restaurant Association
NKRA	Northern Kentucky Restaurant Association
PM	Preventative Maintenance
POTW	Publicly Owned Treatment Works
SSO	Sanitary Sewer Overflow
SSS	Sanitary Sewer System
WCTS	Waste Collection and Treatment System

## **SECTION 1: INTRODUCTION**

Sewer overflows are a threat to public health and the environment. An increasingly common cause of overflows is sewer pipes that are blocked with fats, oils and grease (FOG) used in food processing and in preparation of meals. The purpose of Sanitation District No. 1's (the District) Grease Control Program is to prevent the introduction of FOG into the sanitary sewer system thereby reducing sewer overflows, maximizing sewer capacity and decreasing sewer maintenance costs. In addition, this program is intended to increase awareness of operators of local food service establishments and home owners about measures they can take to limit or prevent the introduction of FOG into the drains and sanitary sewer systems.

On April 18, 2007, the District entered into a Consent Decree with the U.S. Environmental Protection Agency (US EPA) and the Environmental and Public Protection Cabinet (Cabinet), which specifically addresses requirements for the Grease Control Program under the Capacity Management Operation and Maintenance (CMOM) development section (Appendix A). Pursuant to the Consent Decree, the District must submit a schedule to the Cabinet and US EPA for review and joint approval. The schedule shall apply to the development and enforcement of the Grease Control Program and include, at a minimum, the requirements set forth in Exhibit C of the Consent Decree.

The District has developed a Proposed Phased Implementation Plan to meet the requirements of the Consent Decree and increase the effectiveness of the current grease control program. The plan consists of four consecutive phases that will each last 12 months. Phase 1 has already begun and will continue to be implemented after the plan has received joint approval by the Cabinet and US EPA. The schedule for the Proposed Phase Implementation Plan is located in Appendix B of this document. All current grease control activities will continue, and as phases are completed, they will act as an extension of the current Grease Control Program.

## **SECTION 2: CURRENT PROGRAM**

### **2.1 Current Grease Control Program Overview**

In 2004, the District formally implemented a Grease Control Program. The program was specifically designed to prevent fats, oils and grease (FOG) from entering the sanitary sewer system (SSS). Blockages due to FOG in the District's SSS have been minimal. Prior to the Grease Control Program, the District utilized a Grease Preventative Maintenance Program that was designed to eliminate blockages from grease that had already been released into the collection system. In 2005, the District began a public education program aimed at creating community awareness of the harmful effects of FOG. These programs are intended to decrease SSOs caused by grease accumulation in the collection system.

### **2.1.1 Grease Control Program**

All new Food Service Establishments (FSEs) applying for a sanitary sewer capacity connection permit are supplied with new FSE Information (Appendix C). The information provides grease removal and management techniques to eliminate grease from entering the SSS. A diagram of a grease removal device is also included.

Industrial Monitoring Department representatives inspect all existing FSEs that may contribute FOG to trouble call or preventative maintenance (PM) areas. During the inspection, the FSE is required to fill out a Restaurant/Food Service Grease Handling Questionnaire (Appendix D) and submit it to the District. The questionnaire is used to help gain insight for the potential of FOG to enter the collection system. If the potential is established, then the FSE is issued a Food Service Discharge Permit (Appendix E). Random inspections are conducted to ensure compliance with the permit and with the District's Rules and Regulations. All grease trap waste disposed at the Dry Creek Wastewater Treatment Plant is required to have a Domestic Holding Tank Waste Hauler Manifest (Appendix F). The Enforcement Response Plan (ERP) is used for all violations that may occur. Linko FOG, an electronic tracking system, is utilized to track all information and activities pertaining to FSEs.

### **2.1.2 Grease Preventative Maintenance Program**

District field crews respond to all trouble calls concerning collection system blockages or obstructions. The field crew typically uses a high pressure cleaning system called "jetting" to alleviate the problem. Through observations during the jetting process and line inspections using a sewer inspection video camera, the field crew determines if the problem is caused by FOG. All trouble call procedures and observations are summarized into GBA (George Butler Associates), which is an information tracking system. If FOG is found to be a contributor to the blockage or obstruction, then the line is placed on the PM list. Once on the PM list, the line is then jetted every 6 months in order to ensure that a blockage does not cause an SSO. If FOG buildup is caused by a structural defect in the line, the defect is fixed and the line is taken off the PM list.

### **2.1.3 Public Education Program**

In 2005, the District increased public education by developing and sending out a bill insert (Appendix G) to all service area residences. The bill insert, titled "Help Keep Our Sewers Free of Grease", informs the public of the problems grease can cause when it enters the SSS, as well as proper grease handling techniques. The bill insert directs readers to the District's website ([www.sd1.org](http://www.sd1.org)). A section of this website has been dedicated to grease control awareness and it contains specific information for residential and FSE sanitary users.

## **2.1.4 Legal Authority**

### Prohibitions and Requirements

Article 5, Sections 501.1.B.6, 501.5.C and 504 of the District's Sanitary Rules and Regulations provide explicit legal authority to control the discharge of grease into the SSS. Section 501.1.B.6 specifically prohibits the discharge of "any water or waste containing floating fat, oils, or grease" to the wastewater treatment. Pursuant to Section 501.5.C, the General Manager may require grease or oil interception devices or traps on nonresidential property if he deems it necessary for the proper handling of liquid wastes containing oil or grease in excessive amounts. Section 504 deals with grease trap requirements and permitting:

#### Section 504 – Restaurants and Other Commercial Users

1. All restaurants and food service establishments within the boundaries of the District must, upon request, complete a Grease Trap Permit Application/Questionnaire. The Sanitation District will determine the need to issue a permit along with any applicable fees.
2. The District may inspect a grease trap to determine if the trap is of adequate size and working properly.
3. The Sanitation District reserves the right to require cleaning or additional pretreatment if the trap is of inadequate size or not working properly.
4. The District may require that any new restaurant construction within its boundaries submit a detailed drawing of the grease trap and complete a Grease Trap Permit Application/Questionnaire.
5. Other commercial users may be inspected by the District to monitor chemical storage, usage and disposal methods.

### Enforcement

There are numerous provisions in Chapter 220 of the Kentucky Revised Statutes (KRS) and the District's Rules and Regulations pertaining to enforcement of the FOG prohibitions and requirements. In addition, the District has an Enforcement Response Plan that was approved by US EPA in 1991 and updated in 2003; the intent of the plan is to ensure that violations of the District's pretreatment program are remedied.

*General Enforcement Authority:*

**KRS 220.320.** The board may make and enforce regulations that may prevent the unnecessary pollution of any watercourse or supply within the district and may prohibit the discharge into such sewers of any wastes deemed detrimental to the works and improvements of the district

**Article 9, Section 901.4 of the Rules and Regulations.**

The General Manager and other employees of the District shall have the authority to serve notices of violation of these Rules and Regulations. The General Manager shall be responsible for the enforcement of these Rules and Regulations and shall have authority to issue orders and impose penalties as authorized therein,...and shall have any other powers or authority necessary and proper for the enforcement and the achievement of the goals of these Rules and Regulations.

**Article 10, Section 1001.1.A of the Rules and Regulations.**

If any person or public corporation is found to be violating any provision of these Rules and Regulations, the General Manager may:

- (1) Enforce these regulations by **mandamus** or otherwise;
- (4) **Recover by civil action** from any person or public corporation violating any regulation, a sum of not less than \$100 nor more than \$5,000 for each offense, together with costs.

*Administrative Enforcement Remedies:*

Pursuant to Article 10, Section 1001.2.A of the Rules and Regulations, the District may invoke the following remedies:

- (1) Notice of Violation (NOV)
- (2) Administrative Orders such as:
  - Cease and Desist Orders (used in situations where discharge could cause interference or pass through, or otherwise create an emergency situation)
  - Show Cause Orders
- (3) Administrative Fines
  - General Manager may assess a penalty of up to \$1,000 for each violation of the District's Rules and Regulations

### *Judicial Enforcement Remedies:*

Judicial remedies may be sought pursuant to Article 10, Section 1001.2.B in the following situations: (1) when notices of violation and administrative orders have proven ineffective in returning the violating user to compliance; (2) when emergency situations require injunctive relief to halt or prevent discharges which threaten human health or the environment or interfere with the treatment system or (3) to impose civil penalties and recover losses incurred due to noncompliance. All judicial administrative remedies will be sought at the discretion of the General Manager.

The available remedies include:

- (1) Injunctive Relief - where an administrative order does not achieve compliance;
- (2) Cost Recovery - to recover the cost associated with noncompliant acts of a user;
- (3) Civil Penalties - \$1,000 per violation for individuals and \$5,000 per violation for corporations; and
- (4) Termination of Wastewater Treatment Service – the General Manager may terminate or cause to be terminated wastewater treatment system service to any premise if a violation is found to exist.

## **SECTION 3: GREASE CONTROL PLAN REVISIONS**

### **3.1 Consent Decree Requirements Summary**

The District has summarized the Grease Control Plan revisions for each requirement of Exhibit C (see Appendix A) in the Consent Decree. The Phased Implementation Plan has been designed to accomplish each revision.

***1. The District shall review its legal authority to control the discharge of grease into the SSS, identify any deficiencies in such legal authority, and develop and propose to the Cabinet/US EPA for enactment of those revisions to the District's legal authority that are necessary to address such deficiencies, including the authority to institute a permit program.***

The District is conducting a self assessment to determine if any deficiencies in the Rules and Regulations exist. Revisions will be made to address the deficiencies, and will be proposed to the Cabinet/US EPA for approval. After the appropriate approval procedures, the revisions will be published.

***2. The District shall specify accepted devices to control the discharge of grease into the SSS and appropriate deadlines for installation of such devices.***

The District will seek the development of design criteria for grease reduction device standards by the Kentucky Division of Plumbing, Kentucky Health Department and

Kentucky Environmental and Public Protection Cabinet. These criteria, along with the deadlines for installation, will be included in the revisions of the Rules and Regulations.

**3. The District shall establish and implement standards for the design and construction of grease control devices in order to prevent grease discharges into the SSS, including standards for capacity and accessibility, site maps, design documents and as-built drawings.**

The District will seek the development of design criteria for grease reduction device standards by the Kentucky Division of Plumbing, Kentucky Health Department and Kentucky Environmental and Public Protection Cabinet. These criteria, along with the standards for accessibility, site maps, design documents and as-built drawings, will be included in the revisions of the Rules and Regulations.

**4. The District shall establish and implement grease control device management, operation and maintenance standards and/or best management practices that address on-site record keeping requirements, cleaning frequency, cleaning standards, use of additives, and ultimate disposal.**

The Food Service Discharge Permit and Rules and Regulations will be revised to include each of these requirements.

**5. The District shall establish and implement construction inspection protocols, including scheduling, inspection report forms, and inspection record keeping requirements, to assure that grease control devices are constructed in accordance with established design and construction standards.**

All new FSEs will be required to submit plumbing plans to the District prior to operation. These plans will be inspected prior to installation. The grease control device will be inspected during and after installation.

**6. The District shall require that all new commercial and industrial facilities are constructed with appropriate grease control devices and prohibit the operation of any new facility without the installation of the required grease control device.**

All new FSEs will be required to submit plumbing plans to the District prior to operation. These plans must be approved and an appropriate grease control device must be installed and inspected prior to operation.

**7. The District shall establish and implement compliance inspection protocols, including scheduling, inspection report forms, and inspection record keeping requirements to assure that grease control devices are being managed, operated and maintained in accordance with the established management, operation and maintenance standards and/or best management practices.**

An inspection scheduling frequency will be determined and inspection report forms will be developed. Record keeping requirements will be stated in the permit and will be checked during inspections. This information will be stored in Linko FOG.

**8. The District shall develop and propose to the Cabinet/US EPA a regulation giving the District the authority to establish and implement an enforcement program to assure compliance with the Grease Control Program, including but not limited to the imposition of civil penalties and injunctive relief.**

The District will conduct a self assessment and revise the Enforcement Response Plan (ERP) to assure compliance with the Grease Control Program. These revisions will be proposed to the Cabinet/US EPA for approval.

**9. The District shall establish and implement a compliance assistance program to facilitate training of grease generators and their employees.**

A compliance assistance workshop will be developed and a representative from all permitted FSEs will be required to attend. The workshop will explain best management practices (BMPs), permits and rules and regulations.

**10. The District shall establish and implement a public education program directed at reducing the amount of grease entering the SSS from private residences.**

The District will create and send out additional bill inserts to all customers within the service area. The District will also distribute door hangers to inform customers when there has been a blockage or obstruction due to FOG in their area. This literature will focus on the harmful effects of FOG in sewer lines and proper grease handling techniques that can be used to minimize the release of FOG into the collection system.

The grease control section of the District's website will be expanded to contain additional information regarding harmful effects of FOG in sewer lines and proper grease handling techniques that can be used to minimize the release of FOG into the collection system.

**11. The District shall establish and fulfill staffing and equipment requirements to ensure effective implementation of the Grease Control Program.**

The Industrial Monitoring Department, which has three pretreatment coordinators, will be responsible for all the activities associated with the Grease Control Program. The Industrial Monitoring Department will be provided with any necessary equipment. If the workload becomes too great for the current Industrial Monitoring staff, the District will employ an additional Industrial Monitoring Specialist to ensure requirements of the program are being met.

**12. The District shall establish and implement performance indicators to be used by the District to measure the effectiveness of the Grease Control Program. One such performance indicator shall be the reduction in frequency of SSOs attributed, in whole or in part, to the introduction of grease to the WCTS [Waste Collection and Treatment System].**

GBA will be used to determine the number of trouble calls due to grease, number of lines being PM'd and the number of SSOs due to FOG.

Linko FOG will be used to track permits, inspections, violations and correspondence on all permitted FSEs.

**13. The District shall monitor the method and location of disposal of grease removed from accepted grease control devices.**

All grease removed from permitted FSEs must be disposed of in the Dry Creek Wastewater Treatment Plant's grease concentrator. A plant operator will be present during the time of disposal.

**14. District shall require all commercial and industrial facilities that operate grease control devices to complete a standard form at the time that grease is removed from a grease control device. The facility shall be required to provide the date and time the grease was removed, the identity of the grease hauler, the amount of grease removed by volume, and the intended final disposal location. At the time grease is removed from a grease control device, the District shall also require the facility to obtain written certification from the grease hauler that disposal will comply with all federal, state and local laws and regulations. Once disposal occurs, the District shall require the facility to obtain written certification from the grease hauler of the actual disposal location and that the disposal, in fact, complied with all federal, state and local laws and regulations. The facility shall be required to retain all such forms on its premises for inspection by the District.**

The District will revise the Domestic Holding Tank Waste Hauler Manifest to include the required information. After the disposal occurs, the facility will be required to obtain a copy of the manifest.

## **SECTION 4: PROPOSED PHASED IMPLEMENTATION PLAN**

The District has developed a Proposed Phased Implementation Plan to meet the requirements of the Consent Decree and increase the effectiveness of the current grease control programs. The plan consists of four consecutive phases, each lasting 12 months. Implementation of Phase 1 has begun and will continue after the plan has received joint approval from the Cabinet and US EPA (see schedule for Proposed Phase Implementation Plan attached as Appendix B).

## **4.1 Phase 1**

### **4.1.1 Conduct Self Assessment**

The District will acquire a list of FSEs within the service area that are permitted by the Kentucky Health Department. This will aid in determining the magnitude of FSEs that have the potential to discharge FOG to the SSS. This information will also help establish mailing addresses and points of contact for the FSEs.

Field crew personnel currently determine when collection system problems are caused by FOG during a trouble call. This process will be evaluated to determine if the causes of trouble calls are being classified accurately.

Field crew personnel enter trouble call evaluations into GBA. The process of entering information into GBA will be evaluated to ensure data is accurate, accessible and manageable.

The District currently uses a geographical information mapping system called Arc Viewer. One of the primary functions of Arc Viewer is to show the locations of sanitary sewer lines in the service area. This system will be evaluated to find possible mapping capabilities for areas with FOG problems within the collection system.

### **4.1.2 Review Rules and Regulations/Enforcement Response Plan**

A review of the District's Rules and Regulations and ERP is being conducted. This review will identify any deficiencies in the legal authority to control the discharge of grease into the SSS. It will also identify deficiencies in the enforcement program. If found, the deficiencies will indicate revisions to be made in Phase 2 of this program.

The District will review the effectiveness of other publicly owned treatment works (POTWs) Rules and Regulations and ERPs (i.e. Cincinnati MSD, Louisville MSD, and Knoxville Utilities Board). This will provide insight into what is working for utilities in the surrounding area.

### **4.1.3 Design Criteria**

The District will seek the development of design criteria for grease reduction device standards by the Kentucky Division of Plumbing, Kentucky Health Department and Kentucky Environmental and Public Protection Cabinet.

### **4.1.4 FSE Education**

Over the last year, the District has created and distributed BMP posters to be displayed in permitted FSEs and will continue to distribute such posters (see Appendix H). The

FSEs are required to display these posters in areas where there is potential for FOG to be discharged to the SSS.

During the first year of this Phased Implementation Plan, the District will create and send out BMP brochures to all FSEs. The brochure will focus on the harmful effects of FOG in sewer lines and proper grease handling techniques used to minimize the release of FOG into the collection system. These brochures can also be distributed during site visits.

The District will begin researching a compliance assistance workshop for FSEs. An evaluation of other FOG workshops will be conducted to determine content and effectiveness. This workshop will provide FSEs with a comprehensive overview of the Grease Control Program. The workshop will be initiated when all specifics of the program have been established.

The District has met with members of the Kentucky Restaurant Association (KRA) and the Northern Kentucky Restaurant Association (NKRA) to open channels of communication with key stakeholders. The District will continue to work to educate these key stakeholders. Their participation and cooperation is valuable. We will encourage the KRA and NKRA to include grease control program information in their newsletters.

#### **4.1.5 Public Education**

Over the last year, the District has created and distributed door hangers (see Appendix I) and project-specific letters (see Appendix J) to inform customers when there has been a blockage or obstruction due to FOG in their area. These informational pieces focus on the harmful effects of FOG in sewer lines and proper grease handling techniques used to minimize the release of FOG into the collection system. The District will continue to distribute door hangers and letters to customers in areas impacted by FOG related overflows.

During the first year of this Phased Implementation Plan, the District will create and send out additional bill inserts to all customers within the service area. The bill stuffer's will spotlight the harmful effects of FOG in sewer lines and proper grease handling techniques used to minimize the release of FOG into the collection system.

The District will research the "Trap the Grease Program." This program involves supplying residences with a container for grease rather than pouring it down the drain.

## **4.2 Phase 2**

### **4.2.1 Compile Data from Self Assessment**

GBA will be modified and field crew personnel will be trained to ensure data is entered accurately and that the data is accessible and manageable.

The District will create a list of collection system areas experiencing problems with FOG in the sanitary sewers. This list will be created using the information established in GBA in Phase 1.

The District will create a list of FSEs that may be contributing to FOG problem areas. This list will be created using information provided from the Kentucky Health Department in Phase 1.

### **4.2.2 Revise Rules and Regulations/Enforcement Response Plan**

If necessary, the District will begin drafting revisions to the District's Rules and Regulations and ERP to ensure proper legal authority and enforcement.

### **4.2.3 Design Criteria**

The District will continue to coordinate with the Kentucky Division of Plumbing, Kentucky Health Department and Kentucky Environmental and Public Protection Cabinet on the development of design criteria for grease reduction device standards..

### **4.2.4 FSE Education**

The District will continue developing the compliance assistance workshop for FSEs and will maintain the distribution of the BMP posters to permitted FSEs.

The District will also continue to distribute door hangers and letters to residential customers in areas impacted by FOG related overflows. These pieces will be evaluated and updated as needed on a regular basis.

### **4.2.5 Develop Inspection Protocol**

The District will begin developing an inspection protocol for plumbing plans, installation and final inspection. This will ensure the proper installation of appropriate grease control devices.

Inspection frequency and inspection report forms will be developed to determine if the FSE is in compliance with the Grease Control Program.

### **4.3 Phase 3**

#### **4.3.1 Approval for Rules and Regulations/Enforcement Response Plan**

After revisions are made in Phase 2, the documents must go through an approval process. The Cabinet and the District's Board of Directors must approve the revisions and the revisions must be made available to the public.

#### **4.3.2 Modify Food Service Discharge Permit**

Revisions to the Food Service Discharge Permit will be performed to ensure the permit coincides with any new Rules and Regulations and ERP. The permit will address grease control device management, operation and maintenance standards, onsite record keeping requirements, cleaning frequency, cleaning standards, additives and ultimate disposal.

Restaurant/Food Service Grease Questionnaire will be modified to ensure insight to grease handling procedures and proper information is supplied.

#### **4.3.3 Revise Domestic Holding Tank Waste Hauler Manifest**

The Domestic Holding Tank Waste Hauler Manifest currently utilized by the District contains the date, time, amount of grease removed by volume, identity of grease hauler, intended final disposal location, and disposal location certification (see Appendix F). The manifest will be revised, as needed, in order to better monitor the method and disposal of grease.

#### **4.3.4 FSE and Public Education**

During the third year of the Phased Implementation Plan, the District will expand the grease control section of the website. The expansion will contain additional information for the public, FSEs and sludge haulers. District documents and forms will be made available for viewing and printing.

The District will also continue developing the compliance assistance workshop for FSEs and will maintain the distribution of the BMP posters to permitted FSEs.

In addition, door hangers and letters will continue to be distributed to residential customers in areas impacted by FOG related overflows.

#### **4.3.5 Evaluate Staffing and Equipment Requirements**

The Industrial Monitoring Department will be responsible for all the activities associated with the Grease Control Program, and will be provided with any necessary equipment. If the workload becomes too great for the current Industrial Monitoring staff, the District

will employ an additional Industrial Monitoring Specialist to ensure requirements of the program are being met.

## **4.4 Phase 4**

### **4.4.1 Public Readings of Rules and Regulations/Enforcement Response Plan**

After the approval process in Phase 3, the modifications must be read publicly on two separate occasions at the District's board meetings. When Phase 4 is complete, the revisions will be published.

### **4.4.2 Permitting**

All previously permitted FSEs will undergo a reevaluation using the modifications to the Grease Control Program conducted in the previous phases.

Any FSEs in new grease problem areas will be evaluated using the modifications in the previous phases.

All new FSEs will be evaluated using the modifications from the previous phases.

### **4.4.3 FSE Education**

During the fourth year of the Phased Implementation Plan, the District will require all permitted FSEs to attend a compliance assistance workshop and will maintain the distribution of the BMP posters to permitted FSEs.

In addition, door hangers and letters will continue to be distributed to residential customers in areas impacted by FOG related overflows.

### **4.4.4 Evaluate Staffing and Equipment Needs**

The Industrial Monitoring Department will be responsible for all the activities associated with the Grease Control Program, and will be provided with any necessary equipment. If the workload becomes too great for the current Industrial Monitoring staff, the District will employ an additional Industrial Monitoring Specialist to ensure requirements of the program are being met.

### **4.4.5 Performance Indicators**

GBA will be used to determine the number of trouble calls due to grease, number of lines being PM'd and the number of SSOs due to FOG.

Linko FOG will be used to track permits, inspections, violations and correspondence on all permitted FSEs.

## **SECTION 5: CONCLUSION**

When the Phased Implementation Plan is complete in accordance with the schedule set out in Appendix B, the District's Grease Control Program will comply with the requirements set forth in Exhibit C of the Consent Decree and include components such as ordinances, design standards, and expanded permitting, inspection and enforcement protocols. The enhancements made to the Grease Control Program through this Phased Implementation Plan will aid in maximizing sewer capacity and reducing sewer overflows within the collection system.

The District will provide annual progress updates on the Grease Control Program to the Cabinet and US EPA as part of the Annual Consent Decree Report, which is required to be submitted at the end of each calendar year.

**APPENDIX A:**

*Consent Decree Capacity Management Operation and  
Maintenance Development Section*

Recommended improvements shall include schedules for implementation. The District shall apply special emphasis to assessing its Gravity Line Preventative Maintenance Program. The District shall submit an annual report of the status of implementation of its CMOM Programs as provided in Paragraph 43 below.

**(a) Specific CMOM Program Development – Grease Control Program.**

In addition to the Self-Assessment provided above, the District shall also specifically submit to the Cabinet/EPA for review and joint approval within six (6) months of entry of this Consent Decree a Grease Control Program. The Grease Control Program shall include a schedule for the development and enforcement of grease control measures to assure that grease accumulations are not restricting the capacity of the Sewer System contributing to SSOs. At a minimum, the Grease Control Program shall include the requirements set forth on Exhibit C.

**(b) Specific CMOM Program Development – Pump Station Operation Plan for Backup Power.** In addition to the Self-Assessment provided above, the District shall also specifically submit to the Cabinet/EPA for review and joint approval within twelve months of entry of this Consent Decree a Pump Station Operation Plan for Backup Power that evaluates the District's pump stations and includes schedules for providing backup power or other appropriate measures for addressing power outages at the District's pump stations as soon as practicable; provided, however, that such schedules shall not extend beyond December 31, 2015.

**EXHIBIT C**

**GREASE CONTROL PROGRAM REQUIREMENTS**

1. The District shall review its legal authority to control the discharge of grease into the SSS, identify any deficiencies in such legal authority, and develop and propose to the Cabinet/EPA for enactment those revisions to the District's legal authority that are necessary to address such deficiencies, including the authority to institute a permit program.
2. The District shall specify accepted devices to control the discharge of grease into the SSS and appropriate deadlines for the installation of such devices.
3. The District shall establish and implement standards for the design and construction of grease control devices in order to prevent grease discharges into the SSS, including standards for capacity and accessibility, site maps, design documents and as-built drawings.
4. The District shall establish and implement grease control device management, operation and maintenance standards and/or best management practices that address on-site record keeping requirements, cleaning frequency, cleaning standards, use of additives, and ultimate disposal.
5. The District shall establish and implement construction inspection protocols, including scheduling, inspection report forms, and inspection record keeping requirements, to assure that grease control devices are constructed in accordance with established design and construction standards.
6. The District shall require that all new commercial and industrial facilities are constructed with appropriate grease control devices and prohibit the operation of any new facility without the installation of the required grease control device.
7. The District shall establish and implement compliance inspection protocols, including scheduling, inspection report forms, and inspection record keeping requirements to assure that grease control devices are being managed, operated and maintained in accordance with the established management, operation and maintenance standards and/or best management practices.
8. The District shall develop and propose to the Cabinet/EPA a regulation giving the District the authority to establish and implement an enforcement program to assure compliance with the Grease Control Program, including but not limited to the imposition of civil penalties and injunctive relief.



9. The District shall establish and implement a compliance assistance program to facilitate training of grease generators and their employees.
10. The District shall establish and implement a public education program directed at reducing the amount of grease entering the SSS from private residences.
11. The District shall establish and fulfill staffing and equipment requirements to ensure effective implementation of the Grease Control Program.
12. The District shall establish and implement performance indicators to be used by the District to measure the effectiveness of the Grease Control Program. One such performance indicator shall be the reduction in frequency of SSOs attributed, in whole or in part, to the introduction of grease to the WCTS.
13. The District shall monitor the method and location of disposal of grease removed from accepted grease control devices.
14. District shall require all commercial and industrial facilities that operate grease control devices to complete a standard form at the time that grease is removed from a grease control device. The facility shall be required to provide the date and time the grease was removed, the identity of the grease hauler, the amount of grease removed by volume, and the intended final disposal location. At the time grease is removed from a grease control device, the District shall also require the facility to obtain written certification from the grease hauler that disposal will comply with all federal, state and local laws and regulations. Once disposal occurs, the District shall require the facility to obtain written certification from the grease hauler of the actual disposal location and that the disposal, in fact, complied with all federal, state and local laws and regulations. The facility shall be required to retain all such forms on its premises for inspection by the District.

**APPENDIX B:**

*Proposed Phased Implementation Plan Schedule*

Grease Control Program  
Proposed Phased Implementation Plan Schedule

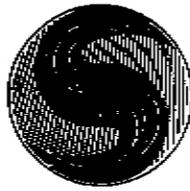
Actions	Phase 1 (12 months)*	Phase 2 (12 months)	Phase 3 (12 months)	Phase 4 (12 months)
Conduct Self Assessment				
Review Rules and Regulation/Enforcement				
Design Criteria				
FSE Education				
Public Education				
Compile Data from Self Assessment				
Revise Rules and Regulation/Enforcement Response Plan				
Develop Inspection Protocol				
Approval for Rules and Regulations/Enforcement Response Plan				
Modify Food Service Discharge Permit				
Revise Domestic Holding Tank Waste Hauler Manifest				
Evaluate Staffing and Equipment Requirements				
Public Reading for Rules and Regulation/Enforcement Response Plan				
Permitting				
Performance Indicators				

Shaded areas indicate actions being performed in phase.

\*The time period for Phase 1 begins to run upon the Cabinet/EPA's joint approval of the District's Grease Control Program

**APPENDIX C:**

*New Food Service Establishment Information*



In an effort to reduce sewer overflows and backups, the Sanitation District No.1 would like to recommend removal and management techniques for fat, oil and grease (FOG) at your facility.

Sanitation District No.1 recommends all establishments that use grease and oil in food preparation install a grease interceptor or trap. All grease and oil interception devices or traps shall be maintained by the owner, at their expense, in continuously efficient operation at all times. They shall be constructed of impervious materials capable of withstanding abrupt and extreme changes in temperatures and shall be of substantial construction, gastight, watertight and equipped with easily removable covers. They shall be located as to be readily and easily accessible for cleaning and inspection. Attached are specifications to help in the design and sizing of a grease trap to best accommodate your establishment.

Please keep in mind if your facility does not take appropriate steps to prevent FOG from entering the sewer, overflows and backups may result. In the event that sewer overflows and backups do occur, Sanitation District No.1 reserves the right to recover the cost of sewer line repair and maintenance. If the FOG removal device is of inadequate size or design, additional pretreatment will be required.

If you have any questions please contact the Industrial Monitoring Department at (859) 547-1109, 1113 or 1115.

Sincerely,

Gary Aman  
Project Manager

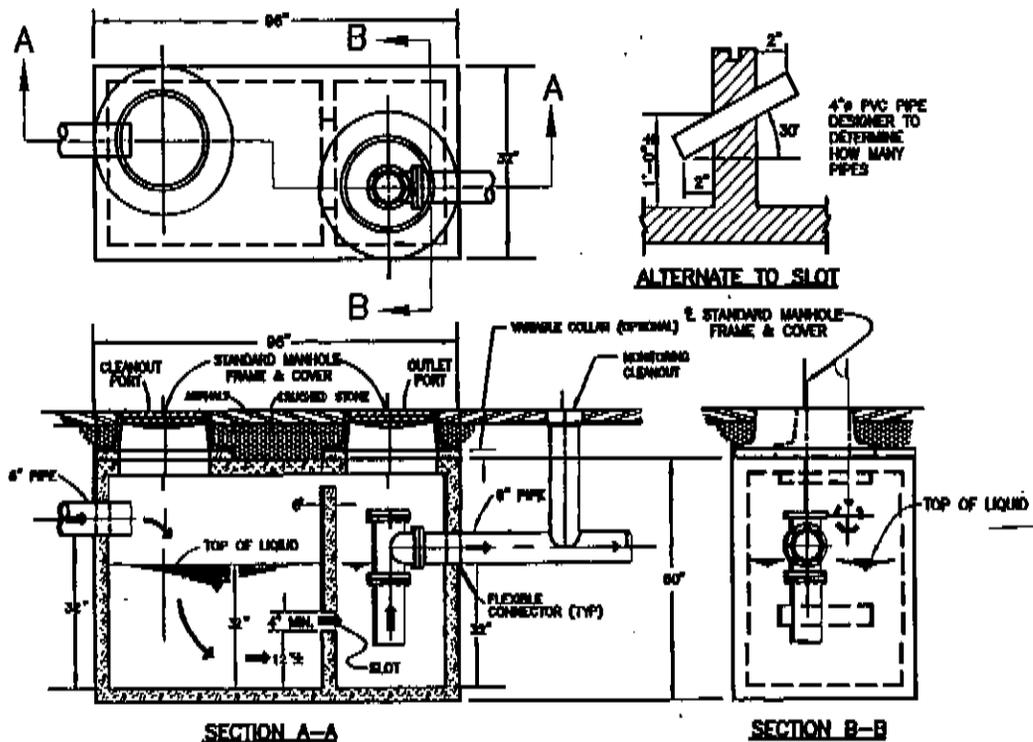
Encl. Grease Trap Specifications  
Sanitation District Rules and Regulations Article 5 Section 504

## GREASE TRAP SPECIFICATIONS

**USE:** The grease trap is to be used as a floating liquid and solid separation unit prior to allowing wastewater containing oils, greases and fats to flow into sanitary sewer. Sanitary (human) waste must not flow through the grease trap. Garbage grinders (disposals) should not be on a connection upstream of a grease trap.

**LOCATION:** The final end of the trap should be located a distance not more than five (5) feet from the outer perimeter of the structure at a point nearest the area where the separate kitchen line emerges from the building. The effluent line is to be connected to the sanitary sewer. In addition, the tank must be located in a position accessible to vault-cleaning trucks.

**CONSTRUCTION:** Cast iron, PVC or polyethylene piping shall be used for the influent to the grease trap. The effluent pipe to the sanitary sewer may be cast iron, vitrified clay or other materials meeting the local and state plumbing code. The joints shall be of watertight construction. Joints in vitrified clay pipe shall be precast to conform to A.S.T.M. SPECIFICATIONS C-425. Joints to outside of the trap may be flexible material.



## DESIGN AND SIZING:

- 1) Items to consider in the design of a grease trap are:
  - a) Accessibility of the trap to assure convenience in cleaning and removal of accumulated grease.
  - b) The distance between inlet pipe and outlet pipe shall be maximized so that adequate separation of grease and wastewater occurs, and short-circuiting is minimized.
  - c) Venting is not necessary for units that have piping of sufficient size such that siphonage of the outlet pipe is unlikely.
- 2) The plan shown herein represents one concept only of a trap of 500 gallon capacity of liquid when in operation. Grease traps are not recommended to be less than 500 gallon capacity. The following table may be consulted and the capacities for each fixture totaled.

**STRUCTURAL DESIGN:** It is the responsibility of the applicant to provide structural design (concrete thickness and composition with appropriate reinforcing steel) to meet the anticipated live and dead loads.

Type of Fixture	Capacity for Initial Unit	Capacity for Additional Unit
Kitchen Sink	150 gal.	50 gal.
Double Comp. Sink	200 gal.	75 gal.
Triple Comp. Sink	250 gal.	100 gal.
Single Comp. Scullery Sink	200 gal.	75 gal.
Double Comp. Scullery Sink	250 gal.	100 gal.
<b>Dishwasher</b>		
Up to 30 gal. Capacity	150 gal.	50 gal.
30 to 50 gal. Capacity	250 gal.	100 gal.
50 to 100 gal. Capacity	400 gal.	150 gal.



Sanitation District No. 1  
1045 Eaton Drive, Ft. Wright, KY 41017

**500 GALLON  
CONCRETE GREASE TRAP**

)

# **SANITATION DISTRICT NO. 1 RULES AND REGULATIONS**

## **ARTICLE 5 WASTEWATER DISCHARGES INDUSTRIAL/COMERCIAL/RESIDENTIAL USERS**

### **Section 504 – Restaurants and Other Commercial Users**

1. All restaurants and food service establishments within the boundaries of the District must, upon request, complete a Grease Trap Permit Application/Questionnaire. The Sanitation District will determine the need to issue a permit along with any applicable fees.
  2. The District may inspect a grease trap to determine if the trap is of adequate size and working properly.
  3. The Sanitation District reserves the right to require cleaning or additional pretreatment if the trap is of inadequate size or not working properly.
  4. The District may require that any new restaurant construction within its boundaries submit a detailed drawing of the grease trap and complete a Grease Trap Permit Application/Questionnaire.
  5. Other commercial users may be inspected by the District to monitor chemical storage, usage and disposal methods.
- )

**APPENDIX D:**

*Restaurant/Food Service Grease Handling Questionnaire*

**SANITATION DISTRICT NO. 1**  
**RESTAURANT / FOOD SERVICE**  
**GREASE HANDLING QUESTIONNAIRE**

**GENERAL INFORMATION**

Facility Name: \_\_\_\_\_

Mailing Address: \_\_\_\_\_

\_\_\_\_\_

Address of Premises: \_\_\_\_\_

\_\_\_\_\_

**CONTACT OFFICIAL**

Name: \_\_\_\_\_

Title: \_\_\_\_\_

Address: \_\_\_\_\_

\_\_\_\_\_

Telephone No.: \_\_\_\_\_

FAX No.: \_\_\_\_\_

Date: \_\_\_\_\_

Signature: \_\_\_\_\_

Name / Title: \_\_\_\_\_

Please complete and return to:

**Sanitation District No. 1**  
**Industrial Monitoring Dept.**  
**2999 Amsterdam Road**  
**Villa Hills, Kentucky 41017**

1. Restaurant: \_\_\_\_\_ Other: (Please describe) \_\_\_\_\_  
\_\_\_\_\_

2. Year built: \_\_\_\_\_

3. Square Footage: \_\_\_\_\_

4. Occupancy: \_\_\_\_\_

5. Average number of meals per day: Breakfast \_\_\_\_\_ Lunch \_\_\_\_\_ Dinner \_\_\_\_\_

6. Days of Operation: S \_\_\_ M \_\_\_ T \_\_\_ W \_\_\_ Th \_\_\_ F \_\_\_ S \_\_\_

7. Hours open: \_\_\_ \_\_\_ \_\_\_ \_\_\_ \_\_\_ \_\_\_ \_\_\_

close: \_\_\_ \_\_\_ \_\_\_ \_\_\_ \_\_\_ \_\_\_ \_\_\_

8. What percentage of meals are prepared on site: \_\_\_\_\_

9. Quantify food usage in pounds per month for the following items:

Meats: \_\_\_\_\_

Fish: \_\_\_\_\_

Poultry: \_\_\_\_\_

Dairy Products (cheeses): \_\_\_\_\_

Oils / Shortening: \_\_\_\_\_

Salad Dressing: \_\_\_\_\_

10. Do you maintain records of any inspections by government agencies? Y/N: \_\_\_\_\_

Explain: \_\_\_\_\_

11. Check any of these items that are present: Floor Drain \_\_\_ Mop Sink \_\_\_ Triple Sink \_\_\_

Double Sink \_\_\_ Hand Sink \_\_\_ Dishwasher \_\_\_ Garbage Disposal \_\_\_

12. Are architectural / plumbing plans available? Y / N: \_\_\_\_\_

13. Are there **grease & oil traps** (interception devices) inside the building? Y / N: \_\_\_\_\_

14. Is there a grease interceptor outside? \_\_\_\_\_

15. What are the size of the grease traps/interceptors? \_\_\_\_\_

16. Do you maintain a record of plumbing and grease trap maintenance: Y / N: \_\_\_\_\_

17. How often is the grease trap/interceptor(s) cleaned? \_\_\_\_\_

18. Date of last grease trap/interceptor cleaning & name of company that cleaned the trap:

\_\_\_\_\_  
\_\_\_\_\_

20. List number of **deep fryers** used on-site: \_\_\_\_\_

How is waste deep fryer oil disposed? \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_

21. Do the cooking appliances capture **grease drippings** from the cooking process and how are the drippings disposed of? Y/N \_\_\_\_\_ Explain: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_

22. Who hauls away the cooking grease and how often? \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_

**APPENDIX E:**

*Food Service Discharge Permit*



June 7, 2006

John Doe  
Owner  
Joes restaurant  
1 Restaurant Road  
Newport, KY 41071

Re: Food Service Discharge Permit FOG-0000-00

Dear Mr. Doe:

The District has received your facilities Restaurant / Food Service Grease Handling Questionnaire for your Food Service Discharge Permit. The permit will take effect on June 7, 2006.

The District is advising Joes Restaurant that the permit should be reviewed thoroughly in order for LaRosa's to be in compliance at all times during the term of the permit with applicable Federal EPA, Kentucky Department for Environmental Protection and Sanitation District No. 1 Rules & Regulations.

If you have any questions regarding this permit, please contact our Industrial Monitoring Department at 859-331-6674 ext. 3105, 3111, 3112.

Best regards,

Jeffery A. Eger  
General Manager

Enclosures:

cc: Industrial Monitoring Dept.

**SANITATION DISTRICT NO. 1  
FOOD SERVICE DISCHARGE PERMIT**

Permit: # FOG-0000-00

Effective Date: June 7, 2006

Fee: \$0.00

Expiration Date: June 7, 2008

In accordance with all of the terms and conditions of the Rules and Regulations of the Sanitation District No. 1 and any applicable provisions of Federal and/or State law or regulation, permission is hereby granted to: Joess Restaurant to discharge non-domestic wastewater to the sewer system from a facility located at 1 Restaurant Rd., Newport, KY 41071 and discharging into the Sanitation District No. 1 sanitary sewers. This permit is granted in accordance with the "Restaurant / Food Service Grease Handling Questionnaire" filed on June 1, 2006 and in conformity with plans, specifications and other data submitted, all of which are filed with and considered as part of this permit.

\_\_\_\_\_  
General Manager

**PERMIT MAY BE REVOKED IF:**

- (a) Fees are not paid within thirty (30) days of issue
- (b) Nature of sewer discharge changes
- (c) Transferred without approval
- (d) State, Federal and/or Sanitation District Rules & Regulations change
- (e) False information or data is given or if the attached conditions and/or requirements are not adhered to

**DUTIES AND REQUIREMENTS**

**WASTEWATER DISCHARGE STANDARDS**

All discharges containing grease must pass through a grease trap system before entering the sanitary sewer. Grease trap systems must be maintained and in good operating condition at all times.

All discharges into the wastewater treatment system are subject to the current Rules & Regulation of the Sanitation District.

The District reserves the right to re-open the permit, to establish more stringent limitations or requirements on discharges to the wastewater sewer system or change any other permit condition, if deemed necessary.

**THIS SECTION INTENTIONALLY LEFT BLANK**

## **REPORTING REQUIREMENTS**

### **A. GREASE TRAP SERVICING REQUIREMENTS**

All Grease and oil interception devices or traps shall be maintained by the owner, at his expense, in continuously efficient operation at all times.

Enzymes and biological additives are not to be used unless written permission is received from the Sanitation District No.1.

Exterior in-ground grease trap cleanings shall not exceed 90 days between cleanings.

### **B. RECORD KEEPING**

A Food Service Discharge Permit Folder must be kept at **1 Restaurant Rd., Newport, KY 41071**. This folder shall be available for periodic inspections, including copying for the Sanitation District. This folder must contain the following at all times:

- Food Service Discharge Permit
- Copies of all receipts for grease hauled off site.
- Copy of the contract with the grease hauler.
- Specifications on all grease traps being used at the facility
- Any past Notices of Violation

Failure to meet any of the record keeping requirements is a violation of the Food Service Discharge Permit and Sanitation District No. 1 Rules and Regulations.

### **C. PERIODIC REPORTS**

None required

**D. All reports required by this permit shall be submitted to the Sanitation District WWTP at the following address:**

*Sanitation District No. 1  
2999 Amsterdam Road  
Villa Hills, Kentucky 41017*

*Attn: Industrial Monitoring Department*

**APPENDIX F:**

*Domestic Holding Tank Waste Hauler Manifest*

**SANITATION DISTRICT NO. 1**

**DOMESTIC HOLDING TANK WASTE HAULER MANIFEST**

Waste Hauler Company Name: \_\_\_\_\_

Sanitation District Permit No.: \_\_\_\_\_ Vehicle License No. \_\_\_\_\_

Customer Name: \_\_\_\_\_ Phone Number: \_\_\_\_\_

Customer Address: \_\_\_\_\_  
\_\_\_\_\_

Date Of Pickup: \_\_\_\_\_ Gallons Pumped: \_\_\_\_\_

Type of Waste:  Septic Tank  Grease Trap  Other (describe)  
\_\_\_\_\_

**CUSTOMER CERTIFICATION**

I certify, under penalty of law, as the customer or an authorized representative of the above named customer, that the above information is true and correct to the best of my knowledge, and further certify that the material being pumped does not contain hazardous wastes as defined by the Federal Resource Conservation and Recovery Act, and is generated from domestic discharges or from food service operations.

Signature \_\_\_\_\_ Date \_\_\_\_\_

**LIQUID WASTE HAULER CERTIFICATION**

I certify that the information listed here is true, accurate and complete. I am aware of the conditions and requirements of the Waste Hauler Permit issued by the Sanitation District. I understand that failure to comply with the Permit conditions may result in immediate suspension of the permit and/or possible penalties as may be allowed by law and the District's regulations.

Driver/Operator Signature \_\_\_\_\_ Date \_\_\_\_\_

**TO BE COMPLETED BY POTW REPRESENTATIVE AT TIME OF DISCHARGE**

Discharge Location: \_\_\_\_\_ Date: \_\_\_\_\_ Time: \_\_\_\_\_

Signature: \_\_\_\_\_ Title: \_\_\_\_\_

Number of Tickets Collected: \_\_\_\_\_ Sample Taken: \_\_\_\_\_

**APPENDIX G:**

*Bill Insert*



**HELP**  
KEEP OUR SEWERS  
FREE OF  
**GREASE!**



Help prevent fats, oils, and greases from damaging your home and the environment.





## What Is The Problem?

As a result of cooking, grease comes from meat fats, lard, margarine, butter, oil, food scraps, baking goods, sauces, and dairy products. When washed down the sink, grease enters the sewer system and sticks to the inside of the sewer pipes. Over time, the amount of grease builds up, causing sewage to back up into your home or to be released into the environment.

## What Can You Do To Help?

- Do not pour grease into sink drains or toilets. Pour grease into a cup or some type of storage container and dispose of in trash.
- Scrape food scraps from plates, utensils, pans, etc. into trash before rinsing in sink.
- Use strainers in sink drains to catch food scraps and dispose in trash or compost pile. Garbage disposals do not keep grease out of sewer lines.
- Spread the word! Notify friends and neighbors of the damaging effects of fats, oils, and grease in our sewer systems.

For more information, visit [www.sd1.org](http://www.sd1.org).

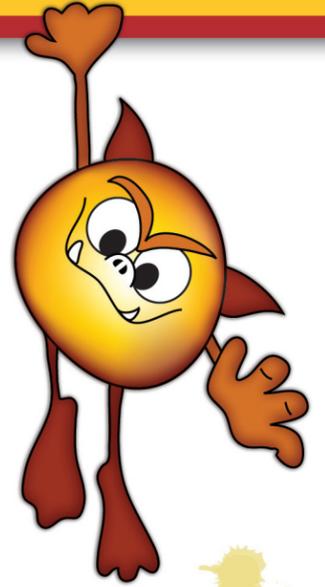


**APPENDIX H:**

*FSE Poster*

---

# NO Grease Down the Drain!



## Do!

- ✓ Place oil and grease in trash bins or covered collection containers.
- ✓ Scrape food scraps from dishes into trash bins. Avoid using garbage disposals.
- ✓ Use a basket strainer in the sink to collect excess food particles.
- ✓ Cover floor drains with fine screens and empty into trash bins as needed.
- ✓ Clean up grease spills with absorbent material and place in trash.
- ✓ Clean grease trap regularly using proper cleaning procedures.

## Don't!

- ✗ Don't pour oil or grease down the drain.
- ✗ Don't scrape food scraps down the drain.
- ✗ Don't pour liquid foods (dairy products, syrups, batters and gravy, etc.) down the drain.
- ✗ Don't run water over greasy dishes, pans or fryers. Use a paper towel to remove any leftover grease before washing.
- ✗ Don't use chemicals to remove grease clogs; they can damage the piping system.
- ✗ Don't pour anything down outside storm sewers. They flow directly to waterways.

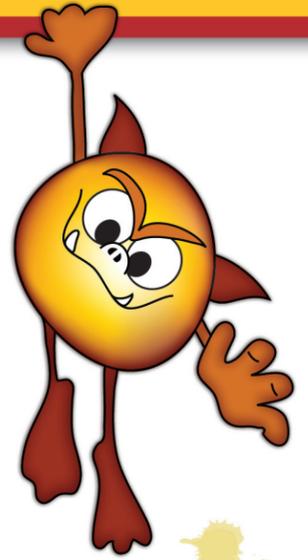
*By properly disposing fats, oils and grease, you can help prevent costly sewage backups and overflows that can cause property damage, environmental problems and other health hazards.*

For more information, please contact:

**Sanitation District No. 1**

1045 Eaton Drive • Ft. Wright, KY 41017 • 859-578-7450 • [www.sd1.org](http://www.sd1.org)

# ¡NO vierta grasa en el drenaje!



## ¡Sí!

- ✓ Ponga el aceite y la grasa en basureros o envases de recolección con tapa.
- ✓ Limpie los restos de comida de los platos y échelos en los basureros. Evite usar un triturador de desperdicios.
- ✓ Use un filtro en forma de canasta para el desagüe y recoja el exceso de partículas de alimentos.
- ✓ Cubra los drenajes del piso con mallas finas y vacíelas en basureros según sea necesario.
- ✓ Limpie los derrames de grasa con material absorbente y deséchelo en la basura.
- ✓ Limpie el filtro de grasa con regularidad, usando procedimientos de limpieza adecuados.

## ¡No!

- ✗ No vierta aceite o grasa en el drenaje.
- ✗ No eche los restos de comida en el drenaje.
- ✗ No vierta alimentos líquidos (productos lácteos, siropes, masas y salsas, etc.) en el drenaje.
- ✗ No enjuague con agua los platos, cacerolas o freidoras llenos de grasa. Use una toalla de papel para eliminar la grasa restante antes de lavarlos.
- ✗ No use productos químicos para eliminar taponamientos de grasa; pueden dañar el sistema de tuberías.
- ✗ No vierta nada en los drenajes para aguas pluviales. Éstos van directamente a las vías fluviales.

***Al desechar de manera correcta la grasa y el aceite, usted puede ayudar a prevenir costosos taponamientos y desbordamientos del alcantarillado que pueden causar daños a la propiedad, problemas ambientales y otros riesgos para la salud.***

Para obtener más información, comuníquese con:

**Sanitation District No. 1**

1045 Eaton Drive • Ft. Wright, KY 41017 • 859-578-7450 • [www.sd1.org](http://www.sd1.org)

**APPENDIX I:**

*Residential Door Hanger*



# NO Grease Down the Drain!

*Grease blockages have begun to impact the sewer pipes in your neighborhood. Here's what you can do to help prevent damage to your home and the environment:*



## Do...

- ✓ Pour grease into a cup or storage container and dispose of in trash.
- ✓ Scrape grease and food scraps from pots, pans and plates into the trash for disposal.
- ✓ Use dry paper towels to remove excess grease from pots, pans and dishes and dispose of in trash.

## Don't...

- ✗ Pour grease or cooking oil down the sink drain or into the toilet.
- ✗ Scrape grease and food scraps from pots, pans and plates down the drain.
- ✗ Rinse grease from dishes and pans down the drain.

*When washed down the drain, grease from meat fats, fryer grease, lard, butter, oil, food scraps, baking goods, sauces and dairy products can plug sanitary sewer lines. By properly disposing of these items, you can help prevent costly sewage backups and overflows.*

## Sanitation District No. 1

Protecting Water Resources

Phone: (859)578-7450; Website: [www.sd1.org](http://www.sd1.org); E-mail: [info@sd1.org](mailto:info@sd1.org)



# ¡NO vierta grasa en el drenaje!

Las obstrucciones causadas por la grasa han comenzado a afectar el alcantarillado de su vecindario. Esto es lo que puede hacer para prevenir daños a su hogar y al medio ambiente:



## Sí...

- ✓ Vierta la grasa en un vaso o un envase y deséchela en la basura.
- ✓ Limpie la grasa y los restos de comida de las cacerolas, sartenes y platos en la basura para su desecho.
- ✓ Use toallas de papel secas para eliminar el exceso de grasa de las cacerolas, sartenes y platos y deséchelas en la basura.

## No...

- ✗ No vierta la grasa o el aceite de cocina en el drenaje del fregadero o en el inodoro.
- ✗ Limpie la grasa y los restos de comida de las cacerolas, sartenes y platos en el drenaje.
- ✗ Enjuague la grasa de los platos y las sartenes en el drenaje.

*Cuando se vacía en el drenaje, la grasa de la carne, las freidoras, el tocino, la mantequilla, el aceite, los restos de comida, los productos horneados, las salsas y los productos lácteos pueden taponar el alcantarillado sanitario. Al desechar de manera correcta estos productos, usted puede ayudar a prevenir costosos taponamientos y desbordamientos del alcantarillado.*

## Sanitation District No. 1

Protegiendo los recursos de agua

Teléfono: (859)578-7450; Sitio Web: [www.sd1.org](http://www.sd1.org);

Correo electrónico: [info@sd1.org](mailto:info@sd1.org)

**APPENDIX J:**

*Residential Letter*

April 11, 2007

Re: Grease blockages in your sewers

Dear Customer:

It was recently brought to our attention that grease blockages were impacting the sewer pipes in your neighborhood causing sewage to back-up and overflow into a nearby lake. Crews have cleared out the blockages in the pipes, but the problem will reoccur if grease continues to enter the sewer system.

When washed down the drain, grease from meat fats, fryer grease, lard, butter, oil, food scraps, baking goods, sauces and dairy products can plug sanitary sewer lines. By properly disposing of these items, you can help prevent costly sewage backups and overflows. Following are disposal tips that you can use:

- Instead of pouring grease or cooking oil down the sink drain or into the toilet, place it in a cup or storage container and then dispose of it in the trash.
- Make sure all plates and pans are free of food scraps and use dry paper towels to remove any excess grease before rinsing.
- Do not pour liquid foods (dairy products, syrups, batters, gravy, etc.) down the drain.

If you have any questions about what is causing the problem or what you can do to help, please do not hesitate to contact Greg Braunwart at (859) 578-6766 between 7:00 am and 3:30 pm, Monday through Friday.

Sincerely,



Jeffery A. Eger  
General Manager