**LITCHFIELD WATER POLLUTION CONTROL AUTHORITY (LWPCA)**

**FATS, OILS AND GREASE PROGRAM**

The CT Department of Energy and Environmental Protection (CT DEEP) has issued a *General Permit for the Discharge of Wastewater Associated with Food Service Establishments* effective October 5th, 2015.

**What does this mean?**

As of **July 1, 2011** all food service establishments with a Food Drug Administration (FDA) Class 2, 3 and 4 Health Department license and any other facilities discharging fats, oils, and grease MUST COMPLY IMMEDIATELY with the new General Permit requirements by installing the required grease trap/interceptor.

**What are my options?**

• Install either a minimum 1,000 gallon outdoor passive grease interceptor1 or

• Super Capacity Grease Interceptor (SCGI)[[1]](#footnote-1) or

• an indoor Active Grease Recovery Unit (AGRU)1

**What in my kitchen needs to be connected to the required AGRU, SCGI or outdoor interceptor?**

The grease trap/interceptor, SCGI, or AGRU shall be connected to those fixtures or drains which would allow fats, oils, and grease to be discharged. This shall include:

• Pot sinks;

• pre-rinse sinks;

• any sink into which fats, oil, and grease are likely to be introduced;

• soup kettles or similar devices;

• wok stations;

• floor drains or sinks into which kettles may be drained;

• automatic hood wash units; and

• any other fixtures or drains that are likely to allow fats, oils and grease to be discharged.

**What will happen if I don’t comply?**

According to the Litchfield FOG Ordinance Section V. 5.14, any violation of the LWPCA’s FOG Management Program will be subject to violation fees. Each day that a violation continues shall be considered a separate occurrence. The payment of the fee will be required 30 days following the issuance of the notice of violation invoice. (Refer to LWPCA’s published charges and fees)

**Facility Registration**

FSEs or any other facility that installs the required grease recovery device shall provide notification to the LWPCA using the Facility Registration form identifying that the facility has achieved compliance with the DEEP General Permit. Once received and approved by the LWPCA, the Registration Approval is valid for a period of three years. The form can be sent email, fax or mail to the following:

To: Litchfield WPCA

Attn: Ted Donoghue

Fax: 860-567-7581

Email: [wpca@townoflitchfield.org](mailto:wpca@townoflitchfield.org)

Address: 29 Stoddard Rd

Bantam, CT 06750

Please note the registrant must reapply for a new registration 30-days prior to the following:

• Expiration date of the 3 year approval period or;

• Any significant changes that would increase the potential for fats, oils, and grease in the discharge or;

• Change of ownership.

Registration forms are available upon request and are available online from the Litchfield Water Pollution Control website at <https://www.townoflitchfield.org/entities/water-pollution-control-authority-wpca>

**Facility Inspections**

FSEs shall be subject to inspections by the LWPCA to determine whether the requirements set forth in the General Permit are being met. Inspections may include but are not limited to; facility walkthrough, review of quarterly inspections of grease interceptor, SCGI or AGRU, review of cleaning and maintenance logs, and effluent sampling.

In the event that a FSEs grease interceptor, SCGI or AGRU fails a visual or effluent sample analysis inspection, the MDC will issue a written notice of violation for the non-compliant condition. The FSE shall take immediate steps to bring the establishment into compliance.

**Variance Program**

The LWPCA may grant a variance of treatment requirements for a FSE for a period of three years. This variance is a waiver of the treatment requirements of Sections 5(b)(1) through 5(b)3, inclusive, of the Department of Environmental Protection’s (DEEP) General Permit for the Discharge of Wastewater Associated With Food Preparation Establishments. The applicant must demonstrate there is a limited potential for fats, oils, and grease in the discharge, as well as minimal flow. If the LWPCA encounters any grease problems in the sewer infrastructure in the area of the establishment, LWPCA has the right to revoke any variances issued.

Please note the applicant must reapply for a variance approval 30-days prior to the following:

• expiration date of the 3 year approval period or;

• any significant menu or operational changes that would increase the potential for fats, oils, and grease in the discharge or;

• change of ownership.

To be considered for a variance, the facility shall complete the variance application and attach a complete menu for the establishment. The application shall include a description of the proposed methods for minimizing grease discharged in the wastewater, including employee training, cleaning procedures and interim grease disposal methods.

Application For Variance *(Provided upon request)*

**Grease Trap Options**

All Class III and Class IV and FDA class 2, 3, and 4 Food Service Establishments (FSEs) are required to install either an Active Grease Recovery Unit (AGRU), Super Capacity Grease Interceptor (SCGI), or a minimum 1,000 gallon outdoor in-ground passive grease interceptor. Specific requirements for these devices are outlined in the [General Permit](http://www.ct.gov/deep/lib/deep/Permits_and_Licenses/Water_Discharge_General_Permits/fog_gp.pdf). All of the following fixtures must be connected to FOG Management Equipment:

* pot sinks (3 bay sinks)
* pre-rinse sinks;
* any sink into which fats, oil, and grease are likely to be introduced;
* soup kettles or similar devices; wok stations;
* floor drains or sinks into which kettles may be drained;
* automatic hood wash units; and
* any other fixtures or drains that are likely to allow fats, oils and grease to be discharged.

**Active Grease Recovery Unit (AGRU)**

Active Grease Recovery Units (AGRUs) are relatively small pretreatment units that can be located inside a kitchen to remove grease at the source of generation. These units allow fats, oils, and grease (FOG) to accumulate within the unit while skimmers or pumps remove the FOG from the unit and deposit the material in a separate container for disposal by a grease removal contractor.  
  
All AGRUs shall be maintained in accordance with the manufacturer’s recommendations. This includes a minimum quarterly (four times per year) clean out of the entire unit. The contents of the trap must be placed into a container for grease trap waste (brown grease). A written log and receipts of all cleaning and maintenance of the trap must be maintained on site for review by the LWPCA.

*See links below for the:*

[Sample AGRU Maintenance Log](https://themdc.org/app/uploads/2020/01/Cleaning-Log-Grease-Interceptor.pdf)  
[AGRU Best Management Practice Poster](https://themdc.org/app/uploads/2020/01/AGRU-BMP-Poster.pdf)  
[List of AGRU vendors, Grease Trap Cleaners and Grease Removal Contractors (2019)](https://themdc.org/app/uploads/2020/01/FOG-Grease-Trap-Vendor-Contact-2019.pdf)

**Super Capacity Grease Interceptor (SCGI)**

Approved Super Capacity Grease Interceptors (SCGIs) are defined as indoor passive units that are certified to retain more than four times the weight (lbs) of grease than the flow rating in gallons per minute (GPM) and meet specifications defined by Section 5(b)(3) of the General Permit.

All SCGIs shall be maintained in accordance with the manufacturer’s recommendations. This includes a minimum quarterly (four times per year) clean out of the entire unit. The contents of the trap must be placed into a container for grease trap waste (brown grease). A written log and receipts of all cleaning and maintenance of the trap must be maintained on site for review by the LWPCA.

**Outdoor In-Ground Grease Trap/Interceptor**

An outdoor in-ground grease trap must be emptied at least every three months or whenever 25% of the operating depth of the grease trap/interceptor is occupied by grease and settled solids, whichever is more frequent. Following a minimum one year of operation, the facility may submit a request to the MDC to extend the cleaning beyond the three month period if the facility demonstrates that the level of grease and solids was less than 25% during each of the three month intervals. The facility shall maintain a written log and receipts of all cleaning and maintenance of the trap.

*Please see links below for the:*

[Cleaning Log for Outdoor Grease Interceptors](https://themdc.org/app/uploads/2020/01/Cleaning-Log-Grease-Interceptor.pdf)  
[Outdoor Grease Interceptor FOG Maintenance Requirements Poster](https://themdc.org/app/uploads/2020/01/Maintenance-Requirements-FOG-Poster-Grease-Interceptor.pdf)

The Standard Specification for MDC outside grease interceptors for kitchens is shown below:

The outdoor grease trap/interceptor specifications are described in Section 5(b)(1) of the General Permit. Installation of a new outdoor grease trap/interceptor shall meet the specifications as described in the General Permit and the MDC specifications.

**Compliance Dates**

Food service establishments and facilities that are applicable to this General Permit shall comply based on the following schedule:

All new facilities shall comply with the requirements of the General Permit before initiating such discharge. An existing facility, which begin operation prior to the effective date of the General Permit (September 30, 2005), shall comply with the requirements of the General Permit no later than July 1, 2011.

**Best Management Practices**

* Renderable fats, oils, and grease shall be disposed of in separate storage containers for recycling by a renderer. No renderable fats, oils, and grease shall be discharged into grease trap/interceptors or AGRUs, sanitary sewers, dumpsters or storm sewers. “Renderable” means uncontaminated fats, oils and grease from the food preparation process that can be used as a source of material that is free of impurities and can be recycled into products such as animal feed and cosmetics.
* The owner/operator shall perform at least quarterly inspections of all indoor and outdoor grease trap/interceptors.
* For disposal in Connecticut, the contents of all grease trap/interceptors, AGRUs and other approved units shall be disposed of at a regional collection/transfer/disposal site.  For disposal outside of Connecticut, the contents of all grease trap/interceptors, AGRUs and other approved units shall be disposed of in an environmentally accepted manner.
* The permittee may use hot water, steam, chemicals, or biological additives in the normal course of facility maintenance, but may not intentionally use hot water, steam, physical means, chemicals, or biological additives that will cause the release of fats, oils, and grease from the grease trap/interceptor. (Please see the link below for additional information.)
* No food grinder (garbage disposal) or food pulper shall discharge to any grease trap/interceptors, AGRUs or other approved units.
* All wastewater flows connected to the grease trap/interceptors shall be screened to prevent solids from entering the treatment units. Screened solids shall be disposed of in accordance with applicable solid waste regulations.

**Contact Us**

Individuals having questions regarding the LWPCA FOG Program may contact:

Litchfield Water Pollution Control

Contact: Ted Donoghue, Plant Superintendent

Phone: 860-567-7580 Cell 860-459-6169

Fax: 860-567-7581

Email: [wpca@townoflitchfield.org](mailto:wpca@townoflitchfield.org)

Address: 29 Stoddard Rd

Bantam, CT 06750

**For additional information:**

The General Permit may be downloaded from the CT DEEP web site at:

<http://www.ct.gov/deep/lib/deep/Permits_and_Licenses/Water_Discharge_General_Permits/fog_gp.pdf>

1. Specific requirements for these devices are outlined in the general permit. [↑](#footnote-ref-1)