

**Appendix F - Element 7: (Fats Oils and Grease (FOG) Control Program)**

***APPENDIX F – Element 7 (Fats Oils and Grease (FOG) Control Program)  
Supporting Documents***

1. List of food facilities in Lathrop (potential grease dischargers)
2. City of Lathrop - Industrial Pretreatment Program, Implementation Procedures.
3. Sample Facility Inspection Forms and Checklist
4. “Preventing Sewer Backups” public outreach brochure.
5. Residential FOG public outreach poster.

## **Appendix F - Element 7: (Fats Oils and Grease (FOG) Control Program)**

### **List of Food Facilities in Lathrop (potential grease dischargers)**

- Baskin Robbins
- Big B Pizza
- Carl's Junior
- Chang's Restaurant
- Chevron
- Country Kitchen
- Denny's
- Jack in the Box
- KFC/A&W
- La Bamba
- La Hacienda Taqueria
- Lathrop Shopping Center
- Little Caesar's Pizza
- Louise Ave. Shopping Center
- Mikasa Japanese Bistro
- McDonalds
- Savemart
- Sicily Pizza
- Starbucks
- Subway
- Sweet Shoppe
- Taco Bell
- Tio Luis Restaurant
- Walastic Filipino Cuisine
- Target
- Walgreens
- Buffalo Wings
- In & Out Burger

City of Lathrop, California  
Industrial Pretreatment Program

**IMPLEMENTATION  
PROCEDURES**

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City of Lathrop  
Industrial Pretreatment Program

## IMPLEMENTATION PROCEDURES

The purpose of this guide is to provide direction to City Staff in the implementation of the Industrial Pretreatment Sewer Use Ordinance for the City of Lathrop, California. The goal of this guide is to provide efficient timely implementation and consistent administration of the Industrial Pretreatment Program. It is the expressed wishes of the City of Lathrop to provide consistent application of the City Codes to all Domestic and Non-Domestic Sewer Users.

The City of Lathrop has contracted with Veolia Water-West to provide full-time management and administrative services assigned to the Pretreatment Coordinator. All Industrial sampling is conducted under the direction of the Pretreatment Coordinator and a third party commercial analytical laboratory is used for analysis of industrial samples. Sampling schedules shall be set by the Pretreatment Coordinator. The City shall budget for sampling services conducted under the Industrial Pretreatment Program and shall assess sampling fees to the Industries sampled under the cost recovery provisions of the Sewer Use Ordinance.

The Implementation Guide provides a guidance for the activities of the Pretreatment Coordinator. Detailed guidance is provided in the City of Lathrop Sewer Use Ordinance, City of Lathrop Enforcement Response Guide, and the EPA Industrial User Inspection and Sampling Manual for POTWs, April 1994. In addition, the Pretreatment Coordinator is encouraged to obtain copies of EPA and State guidance documents when a new or specific industrial sector is under consideration by the City. These guides are often available on the internet or available through State or EPA publications.

The following implementation procedures are provided in this guide:

- IMP 1 – Identification of Existing and New Sources
- IMP 2 – Classify Existing and New Sources
- IMP 3 – User Database Maintenance
- IMP 4 – Permitting Existing and New Sources
- IMP 5 – Permit Modification
- IMP 6 – Permit Termination & Closure
- IMP 7 – Permit Renewal
- IMP 8 – Monitoring
- IMP 9 – IU Self-Monitoring & Reporting
- IMP 10 – Reporting Requirements
- IMP 11 – Recordkeeping
- IMP 12 – Slug Discharge Prevention
- IMP 13 – Best Management Practices
- IMP 14 – Pollution Prevention
- IMP 15 – Enforcement
- IMP 16 – Fat, Oil & Grease Control

## IMP 1 – Identification of Existing and New Sources

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Responsible Person: *Pretreatment Coordinator*

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Frequency: Annual

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Activity: User Survey

It is important that periodic surveys be conducted to identify new sources or new users of the City Sewer System. It is also important to identify those existing users that have changed their processes that result in a new wastestream that must be regulated under the Sewer Use Ordinance. The Pretreatment Coordinator has been assigned this task and shall investigate information about new business startup, and changes in existing businesses upon becoming aware of the changes.

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Procedures:

A User Survey was conducted and a User List was created in the development of the Pretreatment Program. Using a hardcopy of the latest User List, the following resources may be used, individually or in combination, to assist in identifying New and/or Existing Sources and Users. Once a potential user is identified, followup inspections, data disclosure forms, and other activities are required to classify the user and issue a permit if required by the Ordinance.

- A. *Non-Residential Sewer Applications*: These Applications are issued when applying for a City "Building Permit". The Pretreatment Coordinator must provide signed documentation that the application has been reviewed before issuance of the Building Permit. Upon receipt of the "Non-Residential Sewer User Application" the Pretreatment Coordinator shall review the application within 10 working days and shall determine if a Data Disclosure Form is required for further information before issuance of the Building Permit or before acceptance of the Discharge. A sample Non-Residential Sewer Application is provided in Appendix "A" of this guide.
  - B. *City Utility Billing*: The City "Utility Billing Section" invoices all water and sewer customers for services. An annual review of the water usage of the businesses will indicate a process change if there is a significant change.
  - C. *Economic Development Committee*: The Economic Development Committee of the local Chamber of Commerce receives requests for new business locations and works to bring in new businesses to the City. Close communications with the Economic Development Committee provides the Pretreatment Coordinator with the information on new businesses and allows early contact with potential businesses to communicate the Industrial Pretreatment Requirements of the City Sewer Use Ordinance.
  - D. *Local News Media*: The local newspapers, radio, and television often cover stories about new businesses, fires, and accidents that could give indications that a "New Source" exists in the City. The Pretreatment Coordinator shall encourage Wastewater Treatment Plant Personnel to be alert to this information source and shall follow up leads gathered from this resource.
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- E. *Telephone Directory*: Periodic review of the business directory in the City Telephone Directory may provide the name of a new business operating in the community. The Directory is published annually and includes all businesses operating in the City.
- F. *Visual Street Survey*: A visual street survey will be conducted annually by the Pretreatment Coordinator to identify new businesses. Sewer Line Maintenance personnel and street maintenance personnel will be alert to new construction and significant changes in discharges originating from existing businesses.
- G. *Other Sources*: Wastewater Treatment Plant and Sewer Maintenance personnel will be alert to "word-of-mouth" and other information concerning business changes, business operations, and new business development and shall report this information to the Pretreatment Coordinator.

Definitions:

*New Source*:

- (1) Any building, structure, facility, or installation from which there is (or may be) a discharge of pollutants, the construction of which commenced after the publication of proposed pretreatment standards under Section 307(c) of the Act which will be applicable to such source if such standards are thereafter promulgated in accordance with that section, provided that:
  - (a) The building, structure, facility, or installation is constructed at a site at which no other source is located; or
  - (b) The building, structure, facility, or installation totally replaces the process or production equipment that causes the discharge of pollutants at an existing source; or
  - (c) The production or wastewater generating processes of the building, structure, facility, or installation are substantially independent of an existing source at the same site. In determining whether these are substantially independent, factors such as the extent to which the new facility is integrated with the existing plant, and the extent to which the new facility is engaged in the same general type of activity as the existing source, should be considered.
- (2) Construction on a site at which an existing source is located results in a modification rather than a new source if the construction does not create a new building, structure, facility, or installation meeting the criteria of Section (1)(b) or (c) above but otherwise alters, replaces, or adds to existing process or production equipment.
- (3) Construction of a new source as defined under this paragraph has commenced if

the owner or operator has:

- (a) Begun, or caused to begin as part of a continuous onsite construction program
  - (i) any placement, assembly, or installation of facilities or equipment;  
or
  - (ii) significant site preparation work including clearing, excavation, or removal of existing buildings, structures, or facilities which is necessary for the placement, assembly, or installation of new source facilities or equipment; or
- (b) Entered into a binding contractual obligation for the purchase of facilities or equipment which are intended to be used in its operation within a reasonable time. Options to purchase or contracts which can be terminated or modified without substantial loss, and contracts for feasibility, engineering, and design studies do not constitute a contractual obligation under this paragraph.

*New User:* A "new user" is not a "new-source" and is defined as a user that applies to the City for a new building permit or any person who occupies an existing building and plans to discharge wastewater to the City's collection system after the effective date of this ordinance. Any person that buys an existing facility that is discharging non-domestic wastewater will be considered an "existing user" if no significant changes are made in the manufacturing operation.

*Existing Source:* For a categorical industrial user, an "existing source" is any source of discharge, the construction or operation of which commenced prior to the publication by EPA of proposed categorical pretreatment standards, which will be applicable to such source if the standard is thereafter promulgated in accordance with Section 307 of the Act.

*Existing User:* For non-categorical users an "existing user" is defined as any user which is discharging wastewater prior to the effective date of this ordinance.

## IMP 2 – Classify Existing and New Sources

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Responsible Person: *Pretreatment Coordinator*

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Frequency: On Going

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Activity: Classify Existing and New Source

When an Existing Business makes a change that results in the discharge of a regulated wastestream or a New Business discharges a regulated wastestream, the City must identify the pollutants in the wastestream and determine the classification of the user. This classification is then added to the User Database. The “Non-Users” classification is for those businesses not connected to the City sewer. Users connected to the City sewer are classified as *Significant Industrial Users, Categorical Industrial Users, Non-Significant Users, and Commercial Users*. The Pretreatment Coordinator is required to maintain the Industrial User Database. The initial questionnaire found in this procedure is intended to provide sufficient information to determine if the User is either a Non-Significant User or Commercial User. If the determination is that the business will, or may, be classified as a Significant Industrial User or Categorical Industrial User, then a permit application must be submitted by the business and a determination made if the business is a SIU or CIU and if a CIU, whether it is a New Source or Existing Source. These determinations are made after the permit application has been received. Guidance for this process is provided in IMP-4.

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Procedures:

The following procedures are used to gather the data and then a determination based on the collected data must place each user in the appropriate classification. The classification may change as the permitting process progresses. Domestic Users (Residential Users) are included in the User Database.

- A. *Data Questionnaire*: Within **10** days of identifying an Existing Sources or New Source the Pretreatment Coordinator will send a Data Questionnaire to the facility. The User will be instructed to complete the questionnaire and return it to the Pretreatment Coordinator within **30** days. A sample of the data questionnaire form is provided and may be modified as needed to improve data gathering.
  
  - B. *Classification*: Within **30** days of receipt of the questionnaire the Pretreatment Coordinator will determine if the User is a potential Significant Industrial User and whether additional actions are necessary. The Pretreatment Coordinator will classify the User into one of four (4) classifications:
    - Categorical Industrial User (CIU), [Existing or New Source]
    - Significant Industrial User (SIU),
    - Non-Significant User (NSU) with Sub classifications, or
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- Commercial User (COM).

C. *CIU Existing Source/New Source Determination*: Part of the classification of Categorical Industrial Users is to determine if the Pretreatment Standards for Existing Sources or New Sources will be applied. An Existing Source is a business in operation using the categorical process prior to the promulgation of the Federal Categorical Standard. Like wise, a New Source is a business that started operation of the categorical process after the promulgation of the Federal Categorical Standard. These dates are found in the Categorical Standards for each category. Existing Sources will be required to comply with Pretreatment Standards for Existing Sources (PSES) and New Sources will be required to comply with the Pretreatment Standards for New Sources (PSNS).

D. Definitions:

*Categorical Pretreatment Standard or Categorical Standard*: Any regulation containing pollutant discharge limits promulgated by the U.S. EPA in accordance with Sections 307(b) and (c) of the Act (33 U.S.C. 1317) which apply to a specific category of users and which appear in 40 CFR Chapter I, Subchapter N, Parts 405-471.

*Categorical User*: A user covered by one of EPA's Categorical Pretreatment Standards which appear in 40 CFR Chapter I, Subchapter N, Parts 405-471.

*Commercial User*: For non-residential users that discharge a sanitary wastestream only. No industrial process generating a liquid wastestream discharged to the sewer is used at the facility.

*Domestic User (Residential User)*: Any person who contributes, causes, or allows the contribution of wastewater into the City's POTW that is of a similar volume and/or chemical make-up as that of a residential dwelling unit. Discharges from a residential dwelling unit typically include up to 100 gallons per capita per day, 0.2 pounds of BOD per capita, and 0.17 pounds of TSS per capita.

*Existing Source*: For a categorical industrial user, an "existing source" is any source of discharge, the construction or operation of which commenced prior to the publication by EPA of proposed categorical pretreatment standards, which will be applicable to such source if the standard is thereafter promulgated in accordance with Section 307 of the Act.

*Existing User*: For non-categorical users an "existing user" is defined as any user which is discharging wastewater prior to the effective date of this ordinance.

*New Source:*

- a. Any building structure, facility or installation from which there is or may be a discharge of pollutants, the construction of which commenced after the publication or proposed pretreatment standards under section 307(c) of the Act which will be applicable to such source if such standards are thereafter promulgated in accordance with that section, provided that:
  - i. The building, structure, facility or installation is constructed at a site at which no other source is located;
  - ii. The building, structure, facility or installation totally replaces the process or production equipment that causes the discharge of pollutants at an existing source;
  - iii. The production or wastewater generating processes of the building, structure, facility or installation are substantially independent of an existing source at the same site. In determining whether these are substantially independent, factors such as the extent to which the new facility is integrated with the existing plant, and the extent to which the new facility is engaged in the same general type of activity as the existing source, should be considered.
- b. Construction on a site at which an existing source is located results in a modification rather than a new source if the construction does not create a new building, structure, facility or installation meeting the criteria of Section (1)(b) or (c) above but otherwise alters, replaces, or adds to existing process or production equipment.
- c. Construction of a new source as defined under this paragraph has commenced if the owner or operator has:
  - i. Begun, or caused to begin as part of a continuous on-site construction program
    - (a) Any placement, assembly, or installation of facilities or equipment, or
    - (b) Significant site preparation work including clearing, excavation, or removal of existing buildings, structures, or facilities which is necessary for the placement, assembly, or installation of new source facilities or equipment; or

- ii. Entered into a binding contractual obligation for the purchase of facilities or equipment which are intended to be used in its operation within a reasonable time. Options to purchase or contracts which can be terminated or modified without substantial loss, contracts for feasibility, engineering, and design studies do not constitute a contractual obligation under this paragraph.

*Non-Significant User:* For a user that discharges a low volume industrial process wastewater, but not meet the requirements of Categorical or Significant User. Non-Significant Users maybe further classified to indicate pretreatment programs for NSU users, such as, RES for restaurants and food services using grease traps; AUT for automotive repair facilities with oil/water separators or interceptors; SIL for medical and dental facilities with silver bearing wastestreams; etc.

*Significant Industrial User:*

- a. All industrial users subject to Federal Categorical Pretreatment Standards;
- b. Any industrial user that discharges an average of 25,000 gallons per day or more of process wastewater to the POTW (excluding sanitary, non-contact cooling and boiler blowdown wastewater), with the exception of those industrial users which the City determines have no reasonable potential for adversely affecting the POTW's operation or for violating any pretreatment standard or requirement;
- c. Any industrial user that contributes a process wastestream which makes up 5 percent or more of the average dry weather hydraulic or organic capacity of the POTW treatment plant; with the exception of those industrial users which the control authority determines have no reasonable potential for adversely affecting the POTW's operation or for violating any pretreatment standard or requirement;
- d. Any industrial user that has a reasonable potential for violating any pretreatment standard or requirement or adversely affecting the POTW's operation, whether by inhibition, pass through of pollutants, sludge contamination, or endangerment of personnel of the wastewater facilities.

## IMP 3 – User Database Maintenance

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Responsible Person: *Pretreatment Coordinator*

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Frequency: On Going

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Activity: Updating & Maintaining User Database

The City has developed an Industrial User Database. It lists businesses that have been identified as “Non-Users” for those businesses not connected to the City sewer and “Users” for those businesses connected. The Users have been classified as *Significant Industrial Users*, *Categorical Industrial Users*, *Non-significant Users*, and *Commercial Users*. The Pretreatment Coordinator is required to maintain the Industrial User Database.

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Procedures:

As data is gathered through the Annual Survey, Non-Residential Sewer Service Application, and other User Surveys, the user information will be added to the access database developed as the Industrial User Database. All non-domestic wastewater sources of the industrial user classifications will be maintained on this database and a hardcopy printed out periodically, as needed.

When an Industrial User is identified as Categorical or Significant User, a permit application will be submitted by the user. Based on the information disclosed in the application, the User Classification may be modified or changed. The Database must also be changed. The goal is to keep the database up to date at all times.

Instructions on using the Database program are provided in user manuals and on-line tutorials.

## IMP 4 – Permitting Existing and New Sources

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Responsible Person: Permit Preparation: *Pretreatment Coordinator*  
Permit Issue: Director of Public Works

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Frequency: On Going

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Activity: Permit Application, Permit Preparation, & Permit Fact Sheets

*Categorical* and *Significant Industrial Users* must obtain a wastewater discharge permit from the City to discharge to the City sewer. New sources must obtain their permit before commencement of discharge. Existing sources must start the permitting process within 30 days of being identified as a categorical or significant industrial user. It is the City's philosophy to provide treatment of industrial wastewater for all industrial users of the City, based on the ability of the City sewer system to collect and treat the wastes. The Pretreatment Coordinator is not authorized to issue any permit. Only the recognized City Authority that may issue the permit is the Director of Public Works. The City does not have to have full agreement of the User to issue a permit. If the User objects to the final City permit, they may appeal the permit as provided in the Ordinance. City Council approval of SIU/CIU wastewater discharge permits is not required.

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### Procedures:

A. *Permit Applications*: The Pretreatment Coordinator will prepare all permit applications and permit renewal applications, a sample permit application is provided. This application maybe modified to obtain better data disclosure. Based on the potential Classification, the Pretreatment Coordinator should take one of the following actions:

1. Categorical Industrial User (CIU)

- a. Notify User of the City's Classification.
- b. Provide a copy of the Sewer Use Ordinance.
- c. Provide copies of the Federal Categorical Standards believed to be applicable to the industrial processes used at the User's facility.
- d. Issue a Permit Application in accordance with §5.4 of the Sewer Use Ordinance. Establish a **60** day due date for completion of the Application.

2. Significant Industrial User (SIU)

- a. Notify User of the City's Classification.
  - b. Provide a copy of the Sewer Use Ordinance.
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c. Issue a Permit Application in accordance with §5.4 of the Sewer Use Ordinance.

3. Non-Significant Industrial User (NSU)

a. If the User falls into one of the NSU groups that have pretreatment requirements (grease traps, grit traps, oil/water separators, etc.) the User must be notified of their classification and the requirements pertaining to the appropriate group.

b. If the User does not fall into one of NSU groups then no notification is necessary.

4. Commercial User (COM)

No notification is necessary.

*B. Permit Preparation*

1. *Final Classification*: Within **30** days of receipt of the completed Permit Application, make the final determination of the Categorical or Significant User Status. If a final determination cannot be achieved based on the available data, additional data maybe requested from the User. Document the determination and the basis for the determination.

2. *Pre-permit Meeting*: Meet with the User and discuss the final classification, the application of the Categorical Standards, and Local Limits, and other proposed permit conditions. If the User disagrees with the categorical determination, a formal request for a categorical determination may be made to the TCEQ. Document all meetings with the User and discussions with the TCEQ.

3. *Draft Permit*: Prepare a draft discharge permit meeting the requirements of §5 of the Sewer Use Ordinance. Document all decisions in the development of the discharge limitations and other specific requirements of the permit. Provide a copy of the draft permit for review and comment to both the City and the User. Allow the User a minimum of **30** days to review the proposed permit.

4. *Draft Permit Meeting*: Meet with the User to discuss the terms and conditions of the permit. Address all questions and provide an explanation for the permit requirements. Identify potential problems the User may have in meeting the conditions of the permit. Determine if the User will be in compliance with the permit upon issuance of the permit or if a compliance schedule will be required to allow sufficient time for the User to attain full compliance.

5. *Second Draft Permit*: Based on the discussions with the User make the appropriate changes to the proposed permit and include any compliance schedule needed to bring the User into compliance with the permit. In no case should a compliance schedule

require more than three (3) years to attain full compliance.

6. *Conditional City Approval:* Provide a copy of the Second Draft of the Permit to the City for review. Meet with the City to discuss the terms and conditions of the permit; compliance issues; and impact to the POTW. Make any modifications requested by the City and obtain conditional approval of the permit.

C. *Permit Issuance:* The Pretreatment Coordinator will prepare a permit package to include the following:

1. The final draft of the permit;
2. The Authorized Representative Declaration and Permit Acceptance Form;
3. The Self-Monitoring Report Form;
4. The Permit Application; and
5. The permit Fact Sheet for review and approval by the City.

Upon City approval, the City, as the Control Authority, will issue the permit. The signed permit will be returned to the Pretreatment Coordinator for distribution.

D. *Fact Sheet:* The Pretreatment Coordinator will prepare a Fact Sheet containing the following information:

1. Basic user identification and contact information.
2. Discharge limitations,
3. Monitoring requirements,
4. Special reporting requirements,
5. A block diagram of the facility layout, process flow schematic and pretreatment system schematic,
6. A limits development worksheet that was used to establish the discharge limits.

The Fact Sheet shall be retained with the permit. The Fact Sheet is intended to be a summary of the important permit factors and a brief description of the user's business and wastewater processes, along with the thought behind the site specific discharge limits set by the permit. The Fact Sheet must be maintained to keep an up to date summary of the permit.

E. *Authorized Representative Declaration:* The User is required to declare those persons that are authorized to represent the permit holder in all permitting and enforcement actions as defined in §1.4.5 of the Sewer Use Ordinance. The Authorized Representative Declaration is a component of the user permit and the user must make the declaration and submit it to the Pretreatment Coordinator within 15 to 30 days of permit issuance. If the User changes personnel then the User must complete a new declaration and have new signatures for all declared Authorized Representatives. A copy of the declaration is provided in these IMPs.





G. The Fact Sheet, Self-Monitoring and City Monitoring Evaluation Spreadsheets must also be modified to reflect the changes in the permit.

## IMP 6 – Permit Termination & Closure

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Responsible Person:	Preparation: <i>Pretreatment Coordinator</i> Termination: <i>Director of Public Works</i>
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Frequency:	As Needed
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Activity:	Permit Termination & Closures
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Permit Termination is not the same as a Cease and Desist Order issued under an enforcement actions or an Emergency Suspension of Services. A Permit will be terminated for failure to comply with the terms and conditions of the permit and/or compliance orders; for payment of pretreatment and/or user fees. The process of terminating a permit requires sufficient documentation and evidence to justify the termination of services. A voluntary termination only requires the written request made by the User. Voluntary Terminations are usually considered Permit Closures. These could be due to process changes eliminating a regulated wastestream or the closure of the business at the regulated facility. Permit Closures require a physical inspection of the facility to ensure the process wastewater system and pretreatment systems are properly shutdown and disconnected. A closure checklist may be required to make sure all issues relating to the closure are met.

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Procedures:

### A. Permit Terminations:

1. Only the City is authorized to terminate a permit.
2. If the permit is terminated as an enforcement action, the City must follow the guidelines established in the Enforcement Response Plan.
3. The Pretreatment Coordinator will provide all documentation and termination notices and deliver them to the City for Approval and Action. The notices may be returned to the Pretreatment Coordinator for distribution. Samples of permit termination notices are provided in the Enforcement Response Plan.
4. A facility inspection maybe necessary to ensure all regulated wastestreams are no loner discharging to the City Sewer. Followup inspections at later dates may also be required, along with sampling in some cases. The Pretreatment Coordinator will make those recommendations in the Termination Notice issued by the City.

### B. Permit Closures

1. Permit Closures are voluntary actions taken by the Permit Holder. The City does not have to issue an enforcement order to close a permit. Therefore, the Pretreatment Coordinator may take all necessary actions to facilitate the closure of a permit.

2. The Permit Holder must request Permit Closure in writing and identify all industrial processes that will be discontinued or the method in which the process wastewater will be properly treated or how disposal will be handled.
3. The Pretreatment Coordinator must prepare a written confirmation that the facility meets the closure requirements by completing a physical inspection and possibly sampling the discharge to confirm absence of regulated pollutants. A closure checklist may need to be developed to ensure pretreatment facilities are properly closed and disconnected from the City system.
4. It is recommended that the regulated wastestream be physically disconnected from the City sewer system in a manner that can be easily confirmed by an inspector, and is difficult for the permit holder or new occupant to re-connect without the knowledge of a person operating the facility. Accidental or Unknowingly Discharging from the facility should be difficult to accomplish if the wastestream is physically disconnected from the City system. This specifically eliminates the use of an installed valve, even if it is locked closed. The system should be in a condition that an operator can not open a valve to resume discharge. Resumption of the discharge would require the physical installation of piping which would imply willful intent and not an operator action unknown by the facility management.
5. Once a permit is officially closed, the facility owner must start from the beginning of the permitting process if they were a New Source. That would include a permit application and permit preparations, baseline monitoring, and etc.

## IMP 7 – Permit Renewal

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Responsible Person:      Preparation: *Pretreatment Coordinator*  
   Issue: *Director of Public Works*

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Frequency:                      As Needed

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Activity:                              Permit Renewal

Permit renewals are similar to preparing and issuing a new permit. The only difference is that the permit writer (Pretreatment Coordinator) will have more data for making the decisions in the specific needs of the permit. A full application must be submitted and the Fact Sheet must be prepared. It is not recommended to keep the exact permit in-place. The known problems encountered in implement the previous permit should be taken into account and the new permit should be designed to prevent re-occurrence of these problems. The permit holder should be encouraged to prepare a cover letter with the permit application to identify any permit conditions that they would like to see changed, modified, or eliminated. The Pretreatment Coordinator should take these into consideration and provide written comment on each item requested.

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### Procedures:

- A. It is the permit holder's responsibility to obtain a Permit Renewal Application and submit it within **90** days of the expiration date of the permit. The Pretreatment Coordinator may prepare a renewal package, including an application, and send the package to the User approximately **180** days prior to the permit expiration. The User must submit the completed permit application to the Pretreatment Coordinator **90** days before the permit expiration date if the permit holder wishes to continue discharging under the existing permit if the new permit has not been issued prior to expiration date. Discharges occurring after the expiration date and before a new permit can be issued will be considered, *discharging without a permit*, and subject to enforcement actions by the City, unless the renewal application has been submitted to the City **90** days before the expiration date of the permit.
  - B. The Pretreatment Coordinator will evaluate the completed permit renewal application and prepare a new draft permit. If the draft permit contains substantial changes, the Pretreatment Coordinator should follow the process outlined in the permitting steps of IMP-4. If no substantial changes are made the final permit may be drafted upon approval by the City.
  - C. The Pretreatment Coordinator will draft the permit, update the Fact Sheet, the Self-Monitoring Report Form, and along with the Application, submit it to the City for review and final approval.
  - D. Upon approval the City will issue the permit and return it to the Pretreatment Coordinator for distribution.
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Local Limits pollutants listed in §2 of the ordinance.

4. Baseline Monitoring: All Categorical Industrial Users (CIU) are required to conduct Baseline Monitoring to determine compliance with the categorical pretreatment standards. The Baseline Monitoring results must be reported within 90 days of commencement of discharge. Baseline monitoring consists of sampling for all regulated pollutants under the categorical standards for the categorical processes used by the business.
5. Priority Pollutant Scan: At a minimum, the City will analyze one sample every permitting cycle (five years) for all State/EPA Priority Pollutants. This sample shall be collected from the regulated outfall entering the City sewer system. Outfalls upstream of this outfall are not required to be monitored for State Priority Pollutants but may be monitored if directed by the City.
6. Commercial Laboratory Services will be arranged by the Pretreatment Coordinator and approved by the City. These services will follow the City policies for contract services and payment. The City will be responsible for the cost of all analysis.
7. The Pretreatment Coordinator will review and evaluate for compliance all City Monitoring. The Pretreatment Coordinator will confirm all laboratory invoices for accuracy and submit the invoices to the City for payment. The Pretreatment Coordinator will prepare all enforcement documents related to the City Monitoring, cost recovery for the cost of analysis, and a report of the compliance evaluation.
8. The Pretreatment Coordinator will provide the City and the User a summary report of City Monitoring.
9. The City will invoice all cost recovery assessments to the User and will be responsible for collection of fee assessments. The Pretreatment Coordinator is not authorized to assess or collect fees.

### C. Inspections

1. The Pretreatment Coordinator will conduct a minimum of one (1) facility inspection per year.
2. The Pretreatment Coordinator will use a Field Report Form, along with, inspection checklists during the inspection to facilitate a thorough inspection of the facility and the pretreatment records. Sample Inspection Forms are provided.
3. The Pretreatment Coordinator will use the *EPA Industrial User inspection and Sampling Manual for POTWs*, April 1994 as a guide in conducting industrial user inspections.

4. The Pretreatment Coordinator will properly identify himself upon entering the premises and will contact the facility manager. A brief pre-inspection meeting with the manager will be used to inform the manager of the purpose of the inspection and the areas that will be inspected. The manager may then assign an employee to accompany the inspector. On completion of the inspection, the Pretreatment Coordinator will again meet with the manager to identify discrepancies found during the inspection.
5. It is not required that two City representatives be present during an inspection. However, if the inspection is in response to a problem or there is reason to suspect a problem, then it is highly recommended that a second person accompany the Pretreatment Coordinator during the inspection.

#### D. Access Denial:

The Pretreatment Coordinator will get the name and title of the person denying access and immediately leave the premises. The Pretreatment Coordinator will move to a location on public property and notify the City Director of Public Works. The Pretreatment Coordinator will attempt to remain at that location to observe activity at the permitted facility. The Director of Public Works will obtain a search warrant and the Pretreatment Coordinator accompanied by a uniformed police officer will enter the premises to serve the warrant and conduct the inspection. The Pretreatment Coordinator will not attempt to serve a warrant without the presence of a uniformed police officer.

#### E. Use of Cameras During Inspections:

The Pretreatment Coordinator may use a camera to record conditions observed during the inspection. If photographs are taken, each photograph must be recorded on the Field Inspection Report to facilitate the identification of the photo. The time and date of each photo must also be recorded for each photo. A copy of each photo must be provided to the business. All photos shall be considered "Confidential" until the City has had a opportunity to make a formal determination if the subject in the photograph can be considered "Confidential".

If the business refuses to allow photographs, the Pretreatment Coordinator may seek a search warrant as detailed in part D of this IMP. However, the inspection should not be stopped due a refusal by the business to allow photographs. If the inspection does not discover serious violations, or hazardous conditions, the Pretreatment Coordinator should not pursue random photographs of the facility.

#### F. Inspection of the Entire Facility:

The pretreatment inspection should include the entire facility and is not limited to those areas generating wastewater and the wastewater pretreatment system. It is important to inspection all production, storage, warehouses, and repair shops within the permitted facility.

## G. Records Inspections

The pretreatment inspection should include a spot check of the pretreatment records. The records inspection checklist should be used to identify the records to be inspected and the details within the records that should be present. If omissions are found in the records, the inspector may ask for copies of the records. A list of requested records should be recorded on the checklist to make sure all requested copies are provided. If omissions are found in a record, additional records should be inspected to see if the omissions are persistent.

### Comment: Self-Monitoring vs. City-Monitoring

Although the City may not have confidence in the ability or reliability of the User to perform appropriate self-monitoring, the primary reason Self-Monitoring is preferred over City-Monitoring for the following reasons:

1. Self-Monitoring forces the Authorized Representative to review the monitoring results at least once per month;
2. Self-Monitoring required the Authorized Representative to report violations within 24 hours of becoming aware of the violation and therefore documents that management is aware of compliance problems; and
3. Once the Permit Holder reports a violation or a self-monitoring report with a violation it is legally considered an admission of guilt and the City is free to deal with the problem. If a City-Monitoring reports a violation, the first step the Permit Holder will take is to contest the sampling and analysis. This requires the City to prove the Chain-of-Custody to be 100% correct, the sample collection protocols, sample handling, preservation, storage, holding-times, and analytical protocols, in-house lab custody control, and QA/QC. This step alone delays and confuses the compliance issues and often results in persistent non-compliance by the permit holder without attempting to resolve the actual discharge problem.



## IMP 9 – IU Self-Monitoring & Reporting

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Responsible Person:      Sample & Report: *Industrial User*  
   SMR Receiving: *Pretreatment Administrative Assistant*  
   Data Entry: *Pretreatment Administrative Assistant*  
   Evaluation & Validation: *Pretreatment Coordinator*

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Frequency:                      As Needed

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Activity:                              Industrial User Self-Monitoring & Reporting

All industrial users should be required to perform self-monitoring as a condition of their permit. The Pretreatment Coordinator is required to evaluate self-monitoring data for compliance. This evaluation must be documented and the data validated if entered into a computerized evaluation system.

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Procedures:

1. SIU/CIU responsibilities under the SMR requirements

- a. The User may perform the sampling and analysis themselves using EPA approved methods, or they may use a commercial laboratory to sample and/or analyze the effluent discharge.
- b. All sampling must use recognized methodology meeting EPA standards for sample collection and custody control.
- c. All analytical methods must be approved in 40 CFR 136.
- d. The analytical laboratory must have a written QA/QC program and the program must be fully implemented. If a commercial laboratory is used, the laboratory must comply with the state laboratory certification rules.
- e. The User must report the results of all testing performed at the regulated Outfall(s). This includes the testing as specified in the permit and the testing for any other pollutants conducted at the regulated Outfall(s) regardless of whether the pollutants tested are regulated under the permit, or not. Testing for regulated pollutants more frequently than required by the permit must also be reported. The results of all testing must be reported to the City on or before the 20<sup>th</sup> day of the month following the reporting period. The User may use the Self-Monitoring Report Form prepared by the City. If this form is used, the User does not have to submit copies of the actual laboratory report. However, if the City prepared SMR Form is not used, the User must provide a summary of the testing results and a complete copy of all laboratory reports for the testing conducted during the reporting period. For testing of pollutants not regulated

under the permit for routine self-monitoring, the User must provide a summary of the test results and a copy of the complete laboratory report for all testing conducted for those pollutants.

- f. Reporting violations of the permit: The User is required to notify the City Pretreatment Coordinator within 24 hours of becoming aware of the violation. In addition, the User must submit a written report to the City detailing the violation. (see the ordinance for minimum contents of the written report.) If the User conducts self-monitoring, this reporting requirement includes any violation of the pollutant limits contained in the permit. If the User is testing for a pollutant regulated by the ordinance but not specifically monitored under the self-monitoring requirements of the permit, the User must comply with these reporting requirements when becoming aware of a violation of the ordinance. Follow up testing is required within 30 days of becoming aware. Check the ordinance for the follow up testing requirements.

## 2. City Responsibilities under the SMR requirements

- a. Upon receipt of the Self-Monitoring Report, the Pretreatment Administrative Assistant will record the date the report was submitted, the postal stamp date, the date the pretreatment office received the SMR, and date the report was due. All SMRs are due on the 20<sup>th</sup> day of the month following the reporting period.
- b. The Pretreatment Administrative Assistant will enter in the Computer Spreadsheets, the data reported and the recorded dates identified in part (a) of this IMP. The evaluation reports will be printed out and checked for accuracy. The SMR and the SMR Evaluation Report will be sent to the Pretreatment Coordinator for validation and further actions as necessary.
- c. The Pretreatment Coordinator will validate the SMR Evaluation Reports by checking the evaluation against the SMR report. Upon completion of the validation process, the Pretreatment Coordinator will initial and date the SMR Evaluation Reports.
- d. Surcharge Calculations will be forwarded to the Director of Public Works for surcharge billing.
- e. Violations will be handled according to the Enforcement Response Plan and the appropriate Enforcement Action.
- f. The SMR, the SMR evaluation, and the Surcharge Calculations will be filed in the User's SMR File Folder.

## IMP 10 – Reporting Requirements

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Responsible Person:      Inspect/Sample & Report: *Pretreatment Coordinator*

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Frequency:                  Annual Pretreatment Status Report – Annual  
SNC - Annual Publication  
SMR – Monthly  
CMR – One per Year  
Other Reports – See Procedures section

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Activity:                      Reporting Required by City and SIU/CIU

The implementation procedures consider the report source when discussing the reporting requirements: City reporting and User reporting. All reports received by the Pretreatment Coordinator should be reviewed, evaluated, compliance tracked, and properly filed for quick retrieval. All reviews and evaluations should be documented.

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Procedures:

### A. City Reporting

1. *Annual Pretreatment Status Report*: The Pretreatment Coordinator will prepare the Annual Pretreatment Status Report for review and approval by the City. The City will approve by signing the report and submitting it to the Approval Authority. This report is due no later than February 28<sup>th</sup> of each year and will cover the reporting of all data collected during the previous year beginning January 1<sup>st</sup> and ending December 31<sup>st</sup>. The content and format of the report will follow the requirements of the Annual Pretreatment Status Report which is required to follow the State Requirements. The Pretreatment Coordinator will provide a template of the most recent Approval Authority format for use by the Pretreatment Coordinator.
2. *City Monitoring Summary Reports*: The Pretreatment Coordinator will prepare the City Monitoring Summary Reports as specified in IMP-8 of this guide. The City Monitoring Summary Reports will be submitted to both the City and the industrial user.
3. *Significant Noncompliance (SNC) Publications*: Those users determined to be in Significant Noncompliance will be published in the Manteca Bulletin during any month of the year, as long as it is advertised on a Thursday for a period of 10 (ten) calendar days. A copy of the publication and an affidavit of publication must be included in the Annual Pretreatment Status Report described in paragraph 1 of this section.

4. *Other Reports:* As other reports related to the pretreatment program are requested from the State, EPA, or the City, the Pretreatment Coordinator will collect the data and prepare the report for approval and submittal by the City.

## B. User Reports

1. *Self-Monitoring Reports:* These reports are submitted, to the Pretreatment Coordinator, by the User, on City prepared forms. These reports are due on, or before the 20<sup>th</sup> day of the month following the reporting period. All Self-Monitoring Reports will cover a reporting period of one calendar month.
2. *Compliance Schedule Reports:* These reports will be mandated in compliance orders issued to Users by the City. These reports will be due within 14 days of the completion of a milestone date in a compliance report. The contents of these reports will be mandated in the compliance order.
3. *Slug Discharge and Spill Reports:* These reports consist of verbal notification immediately upon becoming aware, and written reports submitted within 5 working days of making the verbal notification. These reports are made to the Pretreatment Coordinator. Verbal notification maybe made directly to the City POTW operators to prevent interference or pass through at the POTW. Specific reporting phone numbers and reporting locations should be included with the reporting requirements in the permits.
4. *Noncompliance Reporting:* The User is required to provide verbal notification to the Pretreatment Coordinator within 24 hours of becoming aware of an unauthorized discharge and/or a discharge with pollutant concentrations in excess of the permit limitations, or Local Limits. The User is required to follow-up this notification with a written report within 5 working days of the verbal notification. The User is also required to resample the discharge for the pollutants in noncompliance within 30 days of the violation unless the City has sampled the effluent since the date of the violation. The results of this sampling are to be reported to the Pretreatment Coordinator within 5 days of receiving the laboratory report.
5. *Substantial Changes:* The User is required to provide written notification of substantial changes in production levels, process modification, pretreatment system modifications, and other changes that would alter the characteristics or volume of the discharge. These reports should be made prior to the changes. The permit should provide more details on the contents and timing of these reports.
6. *90 Day Compliance Reports:* New Categorical Industrial Users must report the compliance status to the permit within 90 days of commencement of discharge. If the facility is not in compliance, a compliance schedule should be included with this report.

## IMP 11 – Recordkeeping

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Responsible Person: Recordkeeping: *Pretreatment Coordinator*

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Frequency: On Going

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Activity: Recordkeeping & Filing

Documents received and generated pertaining to the pretreatment program will be retained for a minimum period of three (3) years. It is recommended that all records pertaining to a User Permit be retained for a period of three (3) years following the expiration of the permit. Records related to an enforcement action will be retained as ordered by a court of law. The records should be filed using a system that allows easy retrieval of User records based on the individual user. It is recommended that all records be placed in classification file folders that allow individual pages to be clasped or bound to the file to prevent loose pages. All records should be properly filed when not in use.

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Procedures:

### A. Record Retention:

Legal Requirement: Minimum 3 years;

Policy on User Files: 3 years past the expiration date of a User Permit

Policy on City Files: 3 years past the expiration date of the NPDES permit.

### B. User Records Filing System:

User Files: Each User will have their only set of files. It is recommended that a set of three, or four, six page classification folders be used for each User. The following filing categories associated with each of the classification folders should be as follows:

#### Permit Folder

- page 1 – User Permit & Authorized Representative Declaration
- page 2 – Fact Sheet: Permit Summary & Description of Operations
- page 3 – Fact Sheet: Facility & Pretreatment System Block Diagrams
- page 4 – Fact Sheet: Limits Worksheets
- page 5 – Self-Monitoring Report Form & Instruction Sheet for City Sampling of SIU/CIU
- page 6 – Permit Application, Classification Determination, & BMR

#### Compliance Folder

- page 1 – Flow Meter Certifications & Slug Discharge Evaluations
  - page 2 – City Inspection Reports of User Facility/Records Inspections
-

page 3 – Communications from User to City  
page 4 – Communications from User to City  
page 5 – Communications from City to User  
page 6 – Enforcement Actions with summary page

SMR/CMR Folder

page 1 – SMR reported by User  
page 2 – City Evaluation of SMR  
page 3 – Surcharge Fee Assessment  
page 4 – Proof of Payment of Assessed Fees  
page 5 – SNC Evaluations  
page 6 – CMR Lab Reports and Evaluation Sheets

Required Plans Folder

This folder to be used for Toxic Organic Management Plans; Slug Discharge Prevention Plans; Best Management Practices Plans; or other special plans or reports required by the City under the User Permit.

## IMP 12 – Slug Discharge Prevention

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Responsible Person:      Inspect/Sample & Report: *Pretreatment Coordinator*

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Frequency:                  Minimum Once (1) every Two (2) Years

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Activity:                      Evaluate SIU/CIU for Potential to Create a Slug Discharge

The Sewer Use Ordinance requires the City to evaluate industrial users a minimum of once (1) every two (2) years for the potential to create a slug discharge and the need for a Slug Discharge Prevention Plan. The evaluation is based on the physical inspections conducted by the Pretreatment Coordinator and the knowledge of the discharge characteristics of the SIU/CIU. If a plan is needed, the SIU will be required to develop the plan, submit the plan for City approval, and implementation of the plan.

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Procedures:

- A. Biennial Evaluation: The Pretreatment Coordinator, every two years, will evaluate each permitted facility for the potential to create a slug discharge to the sewer.
- B. Evaluation Checklist: An Evaluation Checklist is provided in this guide to assist the Pretreatment Coordinator in gathering data and making consistent evaluations.
- C. Permitted facilities required to develop and implement a Slug Discharge Prevention Plan will prepare a written plan and submit it to the City for approval. The Plan will be implemented, employees trained, and the plan reviewed annually.
- D. The plan shall comply with the provisions of §3.3 Accidental Discharge/Slug Control Plans of the ordinance.
- E. The Pretreatment Coordinator will review the Slug Discharge Prevention Plan during routine facility inspections. The Records Inspection Checklist found under the Monitoring IMPs provides a section on the inspection of Slug Discharge Prevention Plans. This Checklist should be used in the plan approval process and during routine inspections.

## IMP 13 – Best Management Practices

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Responsible Person: *Pretreatment Coordinator*

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Frequency: As Needed

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Activity: Best Management Practices Program Development & Implementation

The Pretreatment Coordinator may use Best Management Practices (BMP) as a tool in meeting the goals of the pretreatment ordinance. BMPs may be required as a condition of a permit or used in an enforcement action as a means to bring the user into compliance. BMPs are prepared by the User and approved by the City. The Pretreatment Coordinator may provide guidance documents to the User in preparation of the BMP but the User is the responsible party for developing and implementing the BMP. BMPs may be used to address high strength, low volume discharges not appropriately regulated by a wastewater discharge permit. These would typically involve grease traps maintenance, silver recovery, and mercury reduction programs.

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Procedures:

- A. Establish the basis for a Best Management Practices Program.
- B. The BMP may be written into a permit as a specific requirement.
- C. BMPs may be use in enforcement actions to bring the User into compliance. The BMP requirements would be written into the Consent Order.
- D. A group of commercial (COM) or non-significant users (NSU) may be required to develop a BMP to remove, reduce, or replace a specific group of pollutants using pollution prevention techniques in a best management practices program. This is typically the maintenance of grease traps by restaurants.
- E. The EPA has published a Best Management Practices Guide. The pretreatment coordinator should down load the latest edition of this guide and provide it to the User to aid in the development of their plan.



## IMP 14 – Pollution Prevention

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Responsible Person: *Pretreatment Coordinator*

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Frequency: On Going

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Activity: Pollution Prevention

The Pretreatment Coordinator will encourage all regulated industrial users to develop and implement pollution prevention programs. During routine inspections the Pretreatment Coordinator will record any pollution prevention activities or changes in the pollution prevention activities by the User. Pollution Prevention Programs maybe used as an enforcement tool to bring the User back into compliance with their permit.

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Procedures:

- A. The use of Pollution Prevention (P2) Programs as an enforcement tool is relatively new to pretreatment programs. P2 programs should include:
1. Identify the pollutants that the program is targeting for reduction; identify the source(s) of the pollutant(s);
  2. Identify substitution products that will reduce the presence of the target pollutant;
  3. Identify mechanical controls that can be installed to reduce the volume and/or concentration of the target pollutant;
  4. Identify the operational controls that can be implemented to reduce the volume and/or concentration of the target pollutant;
  5. Identify the person(s) that will be responsible for implementing the P2 program;
  6. Identify the training that will be needed to implement and sustain the P2 program; and
  7. Identify a method of tracking implementation and measuring the results of the P2 Program.
- B. The Pretreatment Coordinator should record whether the following P2 Program information during an inspection:
1. Presence of informal P2 Activity and describe;
    - a. Target Pollutants;
    - b. How long the activity has been in-place;
    - c. What measure of success has been noted;
  2. Presence of a formal P2 Program and describe the following;
    - a. When was the P2 Program started
    - b. Target Pollutants
    - c. How is success measured
    - d. Describe the success measured
    - e. Identify the person or title responsible for the program
    - f. Describe the P2 activities that have been implemented
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## IMP 15 – Enforcement

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Responsible Person: Investigation/Documentation: *Pretreatment Coordinator*  
Enforcement: *Director of Public Works*  
*City Manager*  
Legal Services: *City Attorney*

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Frequency: As Needed

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Activity: Enforcement

Enforcement issues may involve an enforcement action taken against the City by the State or EPA; or an enforcement action taken by the City against a User. Enforcement actions against the City will be addressed by the City. The Pretreatment Coordinator will provide documentation and investigative evidence on behalf of the City. In an enforcement action against an User, the City Official is the responsible officer. The Pretreatment Coordinator will provide documentation and investigative evidence on behalf of the City. The City Attorney will provide legal advice and represent the City in all legal actions. The City should follow the Enforcement Response Plan (ERP) when taking an enforcement action against a User. If the City does not follow the ERP, it should be documented why the City deviated from the plan.

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Procedures:

- A. Enforcement activities will be of an escalating nature as set forth in the *Enforcement Response Plan (ERP)*. This plan is required as part of the Pretreatment Program. All enforcement actions must use the ERP as a guide when taking an enforcement action against a User. The intent of the ERP is to provide for the uniform and consistent enforcement of the sewer use ordinance. The ordinance provides the enforcement actions available; the ERP provides guidance on how and when to take those actions. (*Note: City Attorneys will often attempt to pursue legal actions contrary to the ERP*). The ERP is a formal part of the approved pretreatment program; and represents the enforcement actions that the City established as City policy under the Pretreatment Program. If the program is an approved program, deviation from the ERP must be documented and reported to the Approval Authority (State agency or EPA). In most cases, the Approval Authority will not allow deviation from the ERP and may initiate enforcement actions against the City for failure to fully implement the pretreatment program, which is considered a violation of the City's NPDES permit. The ERP also contains samples of the different enforcement orders used in the pretreatment program. It should be noted, that enforcement actions and formal legal orders that may be used as a basis for a legal action in a court of law. Therefore, enforcement orders should not be in the format of a business or personal letter. Establish a formal format and use the format in all enforcement orders, such as, a notice of violation; an Administrative Order; Compliance Order; Voluntary Compliance Agreement; Service Termination; Administrative Fine; Termination of Permit; etc.

## B. Duties and Responsibilities:

1. *Pretreatment Coordinator*: Data collection, investigation, document preparation, and other support activities will be provided by the Pretreatment Coordinator. There are only two enforcement actions that the Pretreatment Coordinator may take directly against a User: (a) issue a Notice of Violation and (b) Emergency Halting of the User's Discharge.
  - a. *Notice of Violation*: the Pretreatment Coordinator is authorized to provide formal notification to an Industrial User of the User's compliance status and the specific details of the violation(s). In addition, the Notice of Violation may seek additional information directly associated with the violation. This may be in the form of written responses, additional testing, and other activities of an investigative nature.
  - b. *Emergency Halting of Discharge*: the Pretreatment Coordinator may order the temporary halting of a User's discharge, if in the opinion of the Pretreatment Coordinator, the User's discharge would result in (i) a threat to the health and safety of the general public and POTW workers; or (ii) severe property damage. This same authority rests with the POTW Supervisor and the Public Works Director.
2. *City Director of Public Works and City Manager*: are authorized to represent the City in all enforcement actions. These officials are specifically authorized to carry out the following enforcement actions: Termination of Permit; Severance of Water and Sewer Service; assessment of Administrative Fines; Civil and Criminal Actions; imposing requirements for Bonds and Insurance. Authorization also includes: Notice of Violation; Emergency Halting of Discharge; Administrative Orders; and Show Cause Hearings. Administrative Orders include, but are not limited to, voluntary compliance schedules; compliance orders; suspension of permit.
3. *City Attorney*: is not authorized to take any direct enforcement action. The City Attorney is responsible for legal advice and services to support the enforcement of the City Code of Ordinances, which includes the Sewer Use Ordinances.
4. *Mayor and Council*: are not authorized to take any direct enforcement action against a User. The elected officials have oversight responsibilities and ultimate authority in appeals.

C. *Tracking Enforcement Actions*: it is important that every enforcement action taken against a permit holder be tracked. The following information should be recorded in a ledger: The date and type of enforcement action; Basis of Violations; Action Ordered; Milestone dates and due dates; dates milestone actions were completed; dates reports received; dates ordered

actions were confirmed complete; etc. A sample Enforcement Actions Tracking Spreadsheet is provided with this IMP.

## IMP 16 – Fat, Oil & Grease Control

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Responsible Person: Investigation/Documentation: *Pretreatment Coordinator*  
Enforcement: *Director of Public Works*  
*City Manager*  
Legal Services: *City Attorney*

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Frequency: Annual

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Activity: Monitor Maintenance of FOG Interceptors & Traps  
Inspect FOG interceptors and traps for grease overload, failure to separate FOG from wastewater, excessive buildup of food wastes, and FOG pass through. Inspect FOG interceptor and trap maintenance records.

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### Background:

Food Preparation Facilities include Restaurants, Cafeterias (hospitals, nursing homes, schools, etc.) catering services, bakeries, and other facilities that prepare meals. Most of these facilities are required to install and maintain FOG interceptors or traps. FOG interceptor. The requirement to install an interceptor is a function of the building codes and administered through the issuance of a building permit and inspections conducted by the City building inspectors. Once the interceptor has been installed, the owner/operator is required to perform routine maintenance of the interceptor. It is the function of the Pretreatment Coordinator and other designated City inspectors, such as, a Code Enforcement Officer, to verify sufficient maintenance is being conducted to prevent carryover or pass through of FOG from the interceptor.

### Definitions and Descriptions:

FOG means Fats, Oils, and Grease.

FOG Interceptors are installed below ground and may be made up of one, two, or three chambers. Each chamber will have a cleanout (manhole cover) that can be easily removed for inspection and cleaning. Interceptors are usually cleaned by a commercial Grease Trap Cleaning Service using a vacuum pump to remove the entire contents of the interceptor and then fresh water to washdown the sides of the interceptor.

FOG Traps are small units installed under the sinks in the facility. Traps are usually hand cleaned. The waste from the trap is collected in a drum. The drum is then collected by a commercial Waste Disposal Operator.

Waste Grease refers to greases and oils that are manually collected in the facility to prevent it from entering the FOG Interceptor/trap or the sewer system. Waste Grease is usually stored

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in a labeled tank above ground outside the facility. Waste Grease is usually collected by a commercial waste grease recycler.

Garbage Disposals/Food Grinders refers to grinding units that shred and grind waste food that is discharged to the sewer system. These units should not discharge to the FOG Interceptor/Trap. Excessive build up of waste food will interfere with the separation of the FOG from the water wastestream.

Automatic Dishwashers discharge wastewater that is significantly hotter than hand wash dishwasher. Typically, Automatic Dishwashers should not discharge to a FOG Interceptor/Trap unless the interceptor/trap is specifically designed to detain the wash water long enough for the discharged wastewater to cool to allow the FOG to separate from the wastestream. Two and three compartment interceptors would be needed to facilitate the discharge of an Automatic Dishwasher.

Detention Time refers to the length of time wastewater is held in the interceptor. Detention time is a function of discharge rate (gallons per minute) and the volume of the interceptor (gallons). Interceptors must be appropriately sized to allow sufficient detention time for the FOG to separate from the wastewater and float to the surface or for solids to sink to the bottom. Interceptors with insufficient Detention Time will allow pass through of FOG resulting in the buildup of FOG in the sewer collection lines.

Baseline Data includes the following: Business Name, Facility Address, Mailing Address, Phone Number, Owner/Operator Name, Manager Name, Verification of Connection to City Sewer, Verification of FOG Interceptor/trap Installed, Inceptor/trap capacity, Interceptor/Trap Cleaning Frequency, Name, Address, and phone number of Interceptor/Trap Cleaning (pumping) Service used, Name, Address, and phone number of the FOG Waste Disposal Site used by the Cleaning Service. Baseline Data is collected by requiring the facility to complete a FOG Control Questionnaire. This questionnaire is authorized under Section 13.26 of the Sewer Use Ordinance. A sample FOG Control Questionnaire is provided in Attachment A of this IMP.

Grease Trap Service Manifest refers to the document provided to the facility by the commercial Grease Trap Cleaning Service at the time the interceptor is cleaned. It should contain the Name of the Facility, the volume of grease/wastewater removed, the name, address, and phone number of the cleaning service, the name and signature of the cleaning service operator performing the work, the name and address of the disposal site that will be used, and the date the service was performed. Section 13.26.160 E of the Sewer Use Ordinance requires the food service facility to retain copies of these manifest on-site and available for inspection.

Grease Trap Additives refers to any chemical, enzyme, or biological agent added to the FOG Interceptor/trap to improve its operation, destroy the FOG molecules, emulsify the FOG, or impact the operation of the interceptor in any way. Section 13.26.160 I of

the Sewer Use Ordinance prohibits the use of Grease Trap Additives.

### FOG Control Inspection

FOG Control Inspections can be divided into two types: records inspection and interceptor/trap inspection. Inspectors can use their best judgment whether to inspect the interceptor/trap, the records, or both.

### Records Inspection

The FOG Control Inspection Report form provides a checklist of the minimum information that should be collected during the records inspection. The checklist items include: Business Name, Physical Address, Mailing Address, Phone number, Manager's Name, Name/Title of Business Representative present during the inspection, Date of Last three (3) interceptor cleaning, Service Company Name, Address; volume of waste removed; disposal site, address of disposal site.

If the business using a trap, review the in-house cleaning log; who performed the cleaning, date of the last three (3) cleanings, waste disposal record, volume of waste removed, disposal practices.

### Physical Inspection

The FOG Control Inspection Report form provided a checklist for the minimum information that should be collected during the physical inspection. Note that the section of the report form that contains the business information is completed for both a records inspection and physical inspection. Additional information that should be included in the physical inspections include: Operator knew where the interceptor/trap was located; access was easily acquired to interceptor; a grease buildup was present but not excessive; food waste was/was not present; flow is/is not restricted through interceptor; physical damage is not visible; no evidence of recent overflows from interceptor; drain screens used in sinks; food grinders/garbage disposals used and are/ are not connected to interceptor; kitchen cleanliness (excellent, good, fair, poor); interceptor additives are/are not used; waste grease is/is not collected for recycling; area around waste grease collection tank is/is not clean.

### Overflow Response

When responding to a report of a sewer overflow caused by an Interceptor, the inspector should conduct both the records and physical inspection. In addition, the Overflow section of the FOG Control Inspection Report form should be completed. Information in this section of the report would include a description of the overflow site; were other businesses impacted by the overflow; did the overflow reach a storm drain or receiving stream, when did the over flow start and stop, approximately how much wastewater overflowed; corrective actions taken, preventative actions taken.

## Enforcement

Enforcement should be appropriate to level of the problems created by the operator not taking proper actions. The following are examples of the appropriate action level for typical situations:

Compliance Issue	Enforcement Action
Operator fails to retain maintenance records	-verbal notification of record retention requirements; - follow up inspection in 3 months.
Maintenance records are incomplete	-verbal notification of record retention requirements; - follow up inspection in 3 months.
Maintenance record indicates that only partial pumping of trap is be conducted (pumped volume is less than interceptor capacity)	-verbal notification of record retention requirements; - follow up inspection in 3 months
Operator applies grease trap additives to interceptor	-verbal notification of record retention requirements; - follow up inspection in 3 months.
FOG build up in sewer collection lines tracked to user service line; maintenance record indicates reasonable cleaning frequency	-verbal request to pump and clean interceptor and to visually inspect interceptor for damage to inlet, weirs, and outlets -follow up inspection in 1 to 2 weeks
FOG build up in sewer collection lines tracked to user service line; maintenance record indicates inappropriate cleaning frequency	-verbal request to pump and clean interceptor within 48 hours and to visually inspect interceptor for damage to inlet, weirs, and outlets. -follow up inspection within 72 hours
Inspection of interceptor indicates a lack of pumping by an excessive buildup of grease (greater than 12 to 14 inches of floatable grease collected)	-verbal request to pump and clean interceptor within 1 week and to visually inspect interceptor for damage to inlet, weirs, and outlets. -follow up inspection within 2 to 3 weeks
Sanitary Sewer Overflow caused by grease blockage traced to food service facility; records inspection indicate lack of pumping; physical inspection indicates interceptor in need of pumping.	-verbal notification of overflow; -verbal mandatory cleaning within 24 hours; -written notification sent within 24 hours to confirm notice of overflow and mandatory cleaning; -follow up inspection within 24 hours
Waste Grease collection tank is allowed to overflow/spilling of waste grease around collection tank allowing grease to enter stormwater drains	-verbal notification with order to clean up area and to resolve spillage and overflow; -follow up inspection in 24 to 48 hours



## Escalation of Enforcement Actions

In most cases, the enforcement actions is a cooperative effort to inform the user of the City Codes, what constitutes proper maintenance; proper disposal of wastes; record keeping requirements; and what to look for within the interceptor to make sure it is in good working order. However, once the initial enforcement action has been taken and the user fails to perform the required actions or is a repeat offender, the enforcement actions must be escalated. All escalated enforcement actions must be in writing and must be signed by the City Public Works Director. Escalated enforcement actions should be appropriate for the severity of the problem created. Escalated enforcement actions available for the city include, but are not limited to the following:

1. Mandatory Pumping Frequency;
2. Resizing and Replacement of Interceptor;
3. Cost recovery for spill clean up and collection line cleaning;
4. Assessment of Administrative Fines;
5. Suspension of Water/Sewer Services

The City should consider all enforcement options and apply the appropriate action based on the severity of the problem created by the operator's lack of maintenance. In most cases education of the operator is more effective than a heavy handed enforcement policy. Administrative Fines and Cost Recovery should not be assessed at levels that make it more economical to violate the ordinance than to perform the appropriate maintenance.

## City Liability for Sewer Overflows

Not with standing the NPDES and State compliance issues concerning Sanitary Sewer Overflows, the City has financial liabilities for sewer overflows that result in the damage to private property. A sewer overflow into a business or residence, may result is extensive repair bills when drywalls, carpet and flooring must be replaced. If the sewer overflow is due to a grease blockage traced to a restaurant or food preparation facility, that facility may be held liable for the damages. However, the City must show evidence (documentation) that the City has implemented a program to reduce or eliminate sewer overflows due to grease blockage if the City is not to be held liable for property damages. Therefore, it is important to implement and enforce the FOG Control program, uniformly and consistently to all food service providers.

**Sample  
Field Inspection  
Report Form**



**City of Lathrop  
INDUSTRIAL WASTEWATER INSPECTION  
FIELD REPORT**

Permit # \_\_\_\_\_

Inspector: \_\_\_\_\_

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

Time: \_\_\_\_\_

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

Contact Person: \_\_\_\_\_ Title: \_\_\_\_\_

Phone: \_\_\_\_\_

1. **Inspection Type:**     Scheduled  Unscheduled  New Business

2. **Nature of Operation:** \_\_\_\_\_

Fact Sheet Reviewed: \_\_\_\_\_

3. **Describe all Wastestreams to City Sewer System:**

_____	_____	_____
_____	_____	_____
_____	_____	_____

**4. Process Areas:**

Condition/Operation:    Good <input type="checkbox"/> Fair <input type="checkbox"/> Poor <input type="checkbox"/>	General Cleanliness:    Good <input type="checkbox"/> Fair <input type="checkbox"/> Poor <input type="checkbox"/>
Comments:	Comments:

**5. Pretreatment System:**

Type:                    Flow-Thru <input type="checkbox"/> Batch <input type="checkbox"/> Other <input type="checkbox"/>	Describe:
General Condition & Cleanliness: Good <input type="checkbox"/> Fair <input type="checkbox"/> Poor <input type="checkbox"/>	Comments:
Flow Meter: (Type)  Date of Last Calibration _____	Other Installed Monitoring instruments:

**6. Changes since last Inspection:**

Production:
Pretreatment:
Waste Management:

**7. List all other Discharge Permits:**


**8. Record Keeping:**

<p><b>Self-Monitoring Data:</b>                  Record Retention:                      <input type="checkbox"/> 3 years <input type="checkbox"/> &lt;3 years                  Flow Log:                      <input type="checkbox"/> Complete <input type="checkbox"/> Incomplete                  Cain-of-Custody:                      <input type="checkbox"/> Complete <input type="checkbox"/> Incomplete                  Laboratory Results:                      <input type="checkbox"/> Complete <input type="checkbox"/> Incomplete                  Laboratory QA/QC:                      <input type="checkbox"/> Complete <input type="checkbox"/> Incomplete</p>	<p><b>Comments:</b></p>
<p><b>Certifications/Records:</b>                  Flow Meter:                      <input type="checkbox"/> Complete <input type="checkbox"/> Incomplete                  TTO:                      <input type="checkbox"/> Complete <input type="checkbox"/> Incomplete                  Authorized Rep. Signature &amp; Certification:                      <input type="checkbox"/> Complete <input type="checkbox"/> Incomplete                  Review Fact Sheet: <input type="checkbox"/> Up to Date <input type="checkbox"/> Needs Changes                  Review Diagrams: <input type="checkbox"/> Up to Date <input type="checkbox"/> Needs Changes                  Other: _____                      <input type="checkbox"/> Complete <input type="checkbox"/> Incomplete</p>	<p><b>Comments:</b></p>

**9. Pollution Prevention:**

<p>Formal Program In-place: <input type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p><b>Comments:</b></p>
<p>Current Pollution Prevention Activities:</p>	<p><b>Comments:</b></p>

**10. Chemical & Waste Storage:**

<p>General Condition &amp; Cleanliness:                  Good <input type="checkbox"/>                  Fair <input type="checkbox"/>                  Poor <input type="checkbox"/></p>	<p><b>Comments:</b></p>
<p>Hazardous Chemical &amp; Waste Drums properly labeled?  <input type="checkbox"/> YES <input type="checkbox"/> No</p>	<p><b>Comments:</b></p>

**11. Slug Discharge Prevention Plan:**

<p>Plan Required: <input type="checkbox"/> Yes <input type="checkbox"/> No                  MSDS on file: <input type="checkbox"/> Yes <input type="checkbox"/> No                  Plan Implemented: <input type="checkbox"/> Yes <input type="checkbox"/> No                  Date of Last Revision/Revision:</p>	<p><b>Comments:</b></p>
---	-------------------------

**12. Inspection Results & Recommended Actions?**

<p> </p>
<p> </p>

**Sample  
Industrial User  
Inspection Checklist**



## City of Lathrop, CA Industrial Inspection Procedures Checklist

a. Preparation for the Inspection of: \_\_\_\_\_ Permit # \_\_\_\_\_

Completed [ \_\_\_\_\_ ]

- 1. Determine the need for inspection of the given industry. Review Industrial User's Permit and/or applicable regulations and discharge limits.
- 2. Review existing files for available information about the Industry. Existing information such as plant layouts, process flow diagrams, compliance schedule (if applicable), and wastewater analytical data should be taken along during the inspection and verified for accuracy.
- 3. Review water and sewer records to determine water usage and verify connection to the sanitary sewer.
- 4. Review literature about unfamiliar industrial processes which may be encountered. Prepare specific questions to be asked about industrial processes to be encountered.
- 5. As appropriate, contact the industrial user to establish a convenient date and time to perform the inspection. In some cases, no advance notice should be given.
- 6. Prepare sample containers and sampling equipment if monitoring activities may be performed.
- 7. Confirm availability of your co-inspector. [Two inspectors should be present during an Industrial Inspection.]

b. The On-Site Inspection:

Completed [ \_\_\_\_\_ ]

- 1. Conduct a peripheral examination of the Industrial User. Note the size of the industry, additional buildings, outside chemical storage and location of the sanitary sewer.
- 2. Observe the physical characteristics of the wastestream in the sanitary sewer which is emanating from the industrial user, if access is available. Obtain samples if appropriate.
- 3. Establish contact with the chief executive officer, plant manager, or engineer, or another person in similar authority.
- 4. Request a pre-inspection meeting/discussion with the industry representative to:
  - \* Provide an overview of the local pretreatment program and how it affects the industry
  - \* Explain the purpose of your visit
  - \* Emphasize that any process information necessary for the inspection report which the industry feels is proprietary can be handled as confidential information. However, advise the industry that effluent data is public information subject to public access through appropriate means.
  - \* State the City's intent to work cooperatively with industry to meet the goals and requirements of the pretreatment program and the National Pretreatment Policy including Categorical Pretreatment Standards.
  - \* Describe the information you wish to collect during the inspection. Offer the industry official an opportunity to review the inspection report form that you intend to complete.
  - \* Answer any questions for the industry representative about the purpose of the visit or about the pretreatment program.
- 5. Obtain the basic biographical information about the industry such as industry name and address, contact name, title and phone number, number of employees, general overview of the business etc.
- 6. Request a complete tour of the facility and obtain all necessary information to complete the industrial inspection. If the industry manufactures a product, it may be advantageous to follow the process in sequence so that flow diagrams can be prepared.
- 7. Document the exact locations of all sampling points used by the industry. This is especially important if the combined wastestream formula is used by the industry to determine discharge standards.
- 8. Check for implementation of an Accident Spill Prevention Control Plan at the industry. Comment as appropriate on the operation and effectiveness of the plan.
- 9. During the inspection it should be determined if sampling inside the industry will be necessary. Sampling should be conducted at this time or scheduled for a later time with the industry. Unscheduled sampling may be done at any time in the sanitary sewer or at the industry with no advance notice.
- 10. Results of any sampling activities should be incorporated into the inspection report.
- 11. Complete the inspection report as soon as possible after the site visit to aid in its accuracy. Both inspectors must sign and date the final report upon completion. If the industry has requested that specific process information remain confidential, that information should be handled as such. Data on the effluent characteristics cannot be considered proprietary.
- 12. If no follow-up activities are required, the report may be appropriately filed.

**Industrial Inspection Procedures Checklist**

(Continued, Page 2 of 2)

## c. Follow-Up Compliance Activities:

Completed [  ]

1. When all the information has been evaluated, the final conclusion in the inspection report should indicate whether or not the industrial user is in compliance with applicable pretreatment standards and whether any further action is needed by the City at this time. Recommendations with regard to future monitoring may be included, where appropriate, such as:
- \* If the industrial user has been consistently in compliance and has had no major problems, then the monitoring frequency might be reduced or abbreviated.
  - \* Conversely, if the monitoring visit results show problems with pretreatment facilities, chemical handling, or other violations, then the City may want to increase the monitoring frequency, modify the industrial discharge permit, request additional information from the industrial user, etc.
2. If the industrial inspection of sampling results identify problems or violations, the Pretreatment Coordinator must be notified and copies of the report made available to them. The Pretreatment Coordinator shall follow through with the problem/violation until it is satisfactorily resolved. The City should:
- \* Notify the industrial user of the problem/violation
  - \* Possibly conduct additional sampling to verify violations
  - \* Establish or require the development of a compliance schedule
  - \* If appropriate, request that enforcement proceedings be taken against the industrial user
  - \* Ensure that remedial actions have been taken by the industrial user
  - \* Keep the Director of Public Works informed of the status of compliance/enforcement actions.
  - \* Submit a final report to the file once corrective actions have been completed.
3. If the industrial user has processes which are subject to Federal Categorical Pretreatment Standards, then the City must:
- \* Notify the industrial user of its responsibilities [40 CFR 403.8(f)(2)(iii)]
  - \* Submit a category determination request to the State/EPA [40 CFR 403.6(a)], if appropriate
  - \* Require the development of a compliance schedule for the installation of technology required to meet applicable pretreatment standards [40 CFR 403.8(f)(1)(iv)(A)]
  - \* Require the submission of all notices and reports (baseline monitoring report, self-monitoring reports, etc.) from the industrial user [40 CFR 403.8(f)(1)(iv)(B)].
4. Finally, all reports, communications, data, etc. on each industrial user should be filed in a manner so the information is readily available to the Pretreatment Coordinator and/or the Director of Public Works.

**Sample  
Field Inspection  
Report Form**





**City of Lathrop  
INDUSTRIAL WASTEWATER INSPECTION  
FIELD REPORT**

Permit # \_\_\_\_\_

Inspector: \_\_\_\_\_

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

Time: \_\_\_\_\_

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

Contact Person: \_\_\_\_\_ Title: \_\_\_\_\_

Phone: \_\_\_\_\_

1. **Inspection Type:**     Scheduled  Unscheduled  New Business

2. **Nature of Operation:** \_\_\_\_\_

Fact Sheet Reviewed: \_\_\_\_\_

3. **Describe all Wastestreams to City Sewer System:**

_____	_____	_____
_____	_____	_____
_____	_____	_____

**4. Process Areas:**

<b>Condition/Operation:</b> Good <input type="checkbox"/> Fair <input type="checkbox"/> Poor <input type="checkbox"/>	<b>General Cleanliness:</b> Good <input type="checkbox"/> Fair <input type="checkbox"/> Poor <input type="checkbox"/>
<b>Comments:</b> _____ _____	<b>Comments:</b> _____ _____

**5. Pretreatment System:**

<b>Type:</b> Flow-Thru <input type="checkbox"/> Batch <input type="checkbox"/> Other <input type="checkbox"/>	<b>Describe:</b> _____ _____
<b>General Condition &amp; Cleanliness:</b> Good <input type="checkbox"/> Fair <input type="checkbox"/> Poor <input type="checkbox"/>	<b>Comments:</b> _____ _____
<b>Flow Meter: (Type)</b>  Date of Last Calibration _____	<b>Other Installed Monitoring instruments:</b>  _____

**6. Changes since last Inspection:**

<b>Production:</b>  <b>Pretreatment:</b>  <b>Waste Management:</b>
--

**7. List all other Discharge Permits:**

_____	_____
_____	_____

**8. Record Keeping:**

<p><b>Self-Monitoring Data:</b>                  Record Retention:                      <input type="checkbox"/> 3 years <input type="checkbox"/> &lt;3 years                  Flow Log:                      <input type="checkbox"/> Complete <input type="checkbox"/> Incomplete                  Chain-of-Custody:                      <input type="checkbox"/> Complete <input type="checkbox"/> Incomplete                  Laboratory Results:                      <input type="checkbox"/> Complete <input type="checkbox"/> Incomplete                  Laboratory QA/QC:                      <input type="checkbox"/> Complete <input type="checkbox"/> Incomplete</p>	<p><b>Comments:</b></p>
<p>Certifications/Records:                  Flow Meter:                      <input type="checkbox"/> Complete <input type="checkbox"/> Incomplete                  TTO:                      <input type="checkbox"/> Complete <input type="checkbox"/> Incomplete                  Authorized Rep. Signature &amp; Certification:                      <input type="checkbox"/> Complete <input type="checkbox"/> Incomplete                  Review Fact Sheet: <input type="checkbox"/> Up to Date <input type="checkbox"/> Needs Changes                  Review Diagrams: <input type="checkbox"/> Up to Date <input type="checkbox"/> Needs Changes                  Other: _____                      <input type="checkbox"/> Complete <input type="checkbox"/> Incomplete</p>	<p><b>Comments:</b></p>

**9. Pollution Prevention:**

<p>Formal Program In-place: <input type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p><b>Comments:</b></p>
<p>Current Pollution Prevention Activities:</p>	<p><b>Comments:</b></p>

**10. Chemical & Waste Storage:**

<p>General Condition &amp; Cleanliness:                  Good <input type="checkbox"/>                  Fair <input type="checkbox"/>                  Poor <input type="checkbox"/></p>	<p><b>Comments:</b></p>
<p>Hazardous Chemical &amp; Waste Drums properly labeled?  <input type="checkbox"/> YES <input type="checkbox"/> No</p>	<p><b>Comments:</b></p>

**11. Slug Discharge Prevention Plan:**

<p>Plan Required: <input type="checkbox"/> Yes <input type="checkbox"/> No                  MSDS on file: <input type="checkbox"/> Yes <input type="checkbox"/> No                  Plan Implemented: <input type="checkbox"/> Yes <input type="checkbox"/> No                  Date of Last Revision/Revision:</p>	<p><b>Comments:</b></p>
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**12. Inspection Results & Recommended Actions?**

<p> </p>
<p> </p>

**Sample  
Industrial User  
Inspection Checklist**



**City of Lathrop, CA**  
**Industrial Inspection Procedures Checklist**

a. Preparation for the Inspection of: \_\_\_\_\_ Permit # \_\_\_\_\_

Completed [ \_\_\_\_\_ ]

- 1. Determine the need for inspection of the given industry. Review Industrial User's Permit and/or applicable regulations and discharge limits.
- 2. Review existing files for available information about the Industry. Existing information such as plant layouts, process flow diagrams, compliance schedule (if applicable), and wastewater analytical data should be taken along during the inspection and verified for accuracy.
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- 5. As appropriate, contact the industrial user to establish a convenient date and time to perform the inspection. In some cases, no advance notice should be given.
- 6. Prepare sample containers and sampling equipment if monitoring activities may be performed.
- 7. Confirm availability of your co-inspector. [Two Inspectors should be present during an Industrial Inspection.]

b. The On-Site Inspection:

Completed [ \_\_\_\_\_ ]

- 1. Conduct a peripheral examination of the Industrial User. Note the size of the industry, additional buildings, outside chemical storage and location of the sanitary sewer.
- 2. Observe the physical characteristics of the wastestream in the sanitary sewer which is emanating from the industrial user, if access is available. Obtain samples if appropriate.
- 3. Establish contact with the chief executive officer, plant manager, or engineer, or another person in similar authority.
- 4. Request a pre-inspection meeting/discussion with the industry representative to:
  - \* Provide an overview of the local pretreatment program and how it affects the industry
  - \* Explain the purpose of your visit
  - \* Emphasize that any process information necessary for the inspection report which the industry feels is proprietary can be handled as confidential information. However, advise the industry that effluent data is public information subject to public access through appropriate means.
  - \* State the City's intent to work cooperatively with industry to meet the goals and requirements of the pretreatment program and the National Pretreatment Policy including Categorical Pretreatment Standards.
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- 7. Document the exact locations of all sampling points used by the industry. This is especially important if the combined wastestream formula is used by the industry to determine discharge standards.
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- 12. If no follow-up activities are required, the report may be appropriately filed.

**Industrial Inspection Procedures Checklist**

(Continued, Page 2 of 2)

**c. Follow-Up Compliance Activities:**

Completed [    ]

- |                          |   |
|--------------------------|---|
| <input type="checkbox"/> | 1. When all the information has been evaluated, the final conclusion in the inspection report should indicate whether or not the industrial user is in compliance with applicable pretreatment standards and whether any further action is needed by the City at this time. Recommendations with regard to future monitoring may be included, where appropriate, such as: <ul style="list-style-type: none"> <li>* If the industrial user has been consistently in compliance and has had no major problems, then the monitoring frequency might be reduced or abbreviated.</li> <li>* Conversely, if the monitoring visit results show problems with pretreatment facilities, chemical handling, or other violations, then the City may want to increase the monitoring frequency, modify the industrial discharge permit, request additional information from the industrial user, etc.</li> </ul>  |
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| <input type="checkbox"/> | 3. If the industrial user has processes which are subject to Federal Categorical Pretreatment Standards, then the City must: <ul style="list-style-type: none"> <li>* Notify the industrial user of its responsibilities [40 CFR 403.8(f)(2)(iii)]</li> <li>* Submit a category determination request to the State/EPA [40 CFR 403.6(a)], if appropriate</li> <li>* Require the development of a compliance schedule for the installation of technology required to meet applicable pretreatment standards [40 CFR 403.8(f)(1)(iv)(A)]</li> <li>* Require the submission of all notices and reports (baseline monitoring report, self-monitoring reports, etc.) from the industrial user [40 CFR 403.8(f)(1)(iv)(B)].</li> </ul>  |
| <input type="checkbox"/> | 4. Finally, all reports, communications, data, etc. on each industrial user should be filed in a manner so the information is readily available to the Pretreatment Coordinator and/or the Director of Public Works.  |

Baskin Robins
Big B Pizza
Carl's Jr.
Chang's Restaruant
Chevron
Country Kitchen
Denny's
Eagles Nest Harley Davidson
Heidi's Brooklyn Deli
Jack in the Box
KFC/A&W
La Bamba
La Hacienda Taquiria
Lathrop Shopping Center
Little Caeser's Pizza
Louise Ave. Shopping Center
Makasa Japenese Bistro
McDonalds
Savemart
Sicity Pizza
Starbucks
Storage Pro Carwash
Subway
Sweet Shoppe
Taco Bell
Tio Luis Restaurant
Walastic Filipino Cuisine
Target
WalGreens
Buffalo Wings

ITT Tech
University of Pheonix
Lathrop Elementary
Learning Tree Preschool
Joseph Widmer Elementary
Lathrop Annex Elementary

A1 Mobile Lube Co.
American Machines Inc.
Akal Truck and Trailer Repair
Auto Upholstry Unliminited
Borges Auto Service Inc.

Holiday Inn
Best Western Inn
Comfort Inn

Amcor PET Packaging
Captive Plastics
Del Monte Foods
Daimler Chrysler
Fuel Total Systems
Home Depot Distribution
In & Out Burger
JcPenny
RPM Transportation
Swiss American Sausage
Swift Trucking

## PUBLIC WORKS DEPARTMENT

### SANITARY SEWER OVERFLOW PUBLIC OUTREACH FLYER



Tel: (209) 941-7430



# City of Lathrop

### For More Information Contact:

City of Lathrop

Public Works Department

390 Towne Centre Drive

Lathrop, CA 95330

(209) 941-7430

Email: [pweng@ci.lathrop.ca.us](mailto:pweng@ci.lathrop.ca.us)

Or visit our website at:

<http://www.ci.lathrop.ca.us/>



### Public Works Department

390 Towne Centre Drive

Lathrop, CA 95330

Phone: (209) 941-7430

Fax: (209) 941-7449

E-mail: [pweng@ci.lathrop.ca.us](mailto:pweng@ci.lathrop.ca.us)

# Preventing Sewer Back-Ups & Overflows

When a sewer overflow, it is usually the result of inappropriate materials in the sewer system. Please Help the City Prevent Sewer Back-ups and Overflows!

Have you ever experienced a sanitary sewer back-up or overflow? Luckily, most sewer back-ups and overflows can be prevented with a progressive preventive maintenance program. All of us can help to prevent them by wisely using the City Of Lathrop's sanitary sewer system. The City is "recruiting" customer partners who are willing to join our efforts to prevent sewer back-ups and overflows.

Sewer back-ups and overflows are frequently caused by improper materials such as fats, oils and grease being placed into the sewer system by the City's customers. Since fats, oils and grease are lighter than water, they tend to accumulate at the top and sides of sewer pipes and can build up until a blockage occurs. If a blockage happens, the sewer backs up or overflows resulting in property and environmental damage.

The City of Lathrop's Sewer Use Ordinance requires that restaurants should install and maintain grease traps and/or interceptors to prevent grease from entering the sewer system. However, there are many more residential kitchens than there are restaurants in Lathrop. By reducing the amount of fats, oils and grease that enter the sewer system from homes, you can help to protect the environment by preventing sewer back-ups and overflows.

Sanitary sewer systems are designed to handle three things: used water, human body waste, and toilet paper. You can do some simple things that will help the City protect water quality and maintain the sewer system in Lathrop.

## What To Do

- Collect grease in a container and dispose of it in the garbage.
- Place food scraps in waste containers or garbage bags for disposal with solid waste, or start a compost pile.
- Place a wastebasket in the bathroom to dispose of solid waste. Disposable diapers, condoms and personal hygiene products do not belong in the sewer system.
- These suggestions can save you money too! Most sewer back-ups occur between the house and the City's sewer main, where the property owner is responsible for correcting the prob-

lem. Avoiding blockages means avoiding plumbing bills. When the blockage occurs in the City's sewer main, the City will correct the problem. Please call the Public Works Department at (209) 941-7430, to report a sewer back-up or overflow. After hours call the after-hours emergency number, (209) 992-0028.

## What Not To Do

- Pour grease, fats and oils from cooking down the drain.
- Use the toilet as a wastebasket.
- Use the sewer as a means to dispose of food scraps.

## **Public Works Department**

Attn: Utility Engineering Dept.

390 Towne Centre Drive

Lathrop, CA 95330

Phone: (209) 941-7430

Fax: (209) 941-7449

E-mail: [pweng@ci.lathrop.ca.us](mailto:pweng@ci.lathrop.ca.us)







## PUBLIC WORKS DEPARTMENT

# Preventing Sewer Back-Ups & Sewer Overflows

### What To Do

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### **PUBLIC WORKS DEPARTMENT**

**Phone: (209) 941-7430**

**Fax: (209) 941-7449**

**E-mail: [pweng@ci.lathrop.ca.us](mailto:pweng@ci.lathrop.ca.us)**

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