

Operational Division Policy No. 2004-01
Revision No. 3

Metro Water Services
Fats, Oils, and Grease Management Policy
(FOG Program)

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Metro Water Services Fats, Oils & Grease Management Policy

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I. Scope & Purpose

To prevent sanitary and combined sewer system blockages, obstructions, and overflows due to the contribution and accumulation of fats, oils, and grease from food service establishments. This most recent revision to the policy was made on August 9, 2024 to update policies and enforcement.

II. Definitions

1. Authorized Representative of the Food Service Establishment: a person who may be:
 - a. The Owner, or
 - b. General Manager, or
 - c. Manager, or
 - d. Duly authorized representative of the individual designated in this definition if such representative is responsible for the overall operation of the facilities from which the indirect discharge originates.
2. Department: Metro Water Services, Metropolitan Government of Nashville and Davidson County.
3. Fats, Oils, & Grease (FOG): Organic polar compounds derived from animal and/or plant sources. FOG may be referred to as “grease” or “greases” in this section.
4. Food Service Establishment (FSE): Any establishment, business or facility engaged in preparing, serving or making food available for consumption. Single family residences are not considered FSEs, however, multi-dwelling units may be considered as FSEs at the discretion of the Director. Food Service Establishments will be classified as follows:
 - a. **Class 0**: Mobile Food Units (MFU) – micro kitchens that fit in a trailer or large truck that have no permanent address and operate under a commissary or service agreement to discharge wastewater on a once-daily basis.
 - b. **Class 1**: Small Shop – engaged in the service of cold-cut and microwaved sandwiches/subs with no frying or grilling on site, ice cream shops, beverage bars or any facility where only food service includes dairy products that are disposed into the wastewater system.
 - c. **Class 2**: Limited Service Facilities (maximum classification-depending on menus, food preparation, operating hours, and number of meals served, seating capacity 65 or less)
 - d. **Class 3**: Full Service Restaurants (maximum classification-seating capacity-seating capacity greater than 65)
 - e. **Class 4**: Buffet and Cafeteria Facilities (maximum classification-seating capacity greater than 65)
 - f. **Class 5**: Institutions (Hospitals, Nursing Homes, Prisons, etc.)
5. (Brown) Grease: Fats, oils and grease that is discharged to the grease control equipment.
6. (Yellow) Grease: Fats, oils and grease that has not been in contact or contaminated from other sources (water, wastewater, solid waste, etc.) and can be recycled.
7. Grease Control Equipment (GCE): A device for separating and retaining wastewater FOG prior to wastewater exiting the FSE and entering the Metro Water Services’ sewer system. The GCE is so constructed as to separate and trap or hold fats, oils, and grease substances from entering the Metro Water Services’ sewer system. Devices include grease interceptors, grease

traps, or other devices approved by the Director.

8. Grease Interceptor (GI): Grease Control Equipment identified as a large tank, usually 500 gallon to 2,000 gallon capacity, which provides FOG control for a FSE. Grease interceptors will be approved by Metro Water Services and located outside the FSE, unless a variance request has been granted. These can come in two styles:
 - a. Gravity Grease Interceptor (GGI): FOG is separated from water and solids by gravity during a minimum of 30 minutes retention time.
 - b. Hydromechanical Grease Interceptor (HMGI): FOG is separated from water and solids by flow control, air entrainment, buoyancy, and baffling.
9. Grease Interceptor Digital Monitoring Alarm (DMA): a system that alerts responsible parties when the capacity of a Grease Interceptor has reached a pre-set limit as detected by a Grease Interceptor Digital Monitoring Device.
10. Grease Interceptor Digital Monitoring Device (DMD): a system and its components capable of remotely monitoring contents and capacity of a Grease Interceptor and sending data to responsible parties identified by the Department.
11. Grease Trap: Grease Control Equipment identified as a small container (less than 500 gallons). Effectively, this is a synonym for a low capacity hydromechanical grease interceptor in most cases.
12. Grease Recycle Container: Container used for the storage of yellow grease.
13. Non-Compliance Notification (NCN): A notification to the user that a practice, an action, or wastewater discharge is noncompliant with Department regulations or policies. The NCN informs the user that an action is required of the user within a specified timeframe designated by the Department or their designee, or the noncompliance will require the Department to escalate enforcement action against the user.
14. POTW (Publicly Owned Treatment Works): A POTW is a wastewater treatment facility and its entire infrastructure that is owned by a state or municipality.
15. Remote Suction: process of removing the entire contents of a grease interceptor through a 4" outlet accessible at street level, generally used in locations with limited space options.
16. Sewer Discharge Compliance/Review: the nomenclature used by Metro Nashville's Department of Codes and Building Safety Permitting Division to refer to plans reviews and inspections required under this Policy.
17. (Black) Water: Wastewater containing human waste, from sanitary fixtures such as toilets and urinals.
18. (Gray) Water: Refers to all other wastewater other than black water as defined in this section.

III. General Requirements

1. All existing Food Service Establishments (FSEs) are required to have grease control equipment (GCE) installed, maintained, and operating properly, in accordance with this FOG Management Policy unless a variance from this requirement has been granted by the Department.
2. All FSEs will be required to maintain records of cleaning and maintenance of GCE. GCE maintenance records include, at a minimum, the date of cleaning/maintenance, company or person conducting the cleaning/maintenance, and volume (in gallons) of grease wastewater removed. A grease waste hauler completed manifest must include this information to meet this requirement.
3. GCE maintenance records will be available at the FSE premises so they can be provided to Metro Water Services or their representative, and/or the Metro Health Department. The records may be in hardcopy or digital format but must be immediately available for presentation upon request. The FSE shall maintain GCE maintenance records for a minimum of three (3) years.
4. All FSEs are required to use strainers in every fixture drain and every floor drain to mitigate the introduction of solids into the grease system, particularly large inorganic kitchen materials such as plastic bags, rubber gloves, drinking straws, etc.
5. All FSEs are required to dispose of yellow grease in an approved container, where contents will not be discharged to any storm water grate, drain or conveyance. Container must be intact with no holes or cracks and lid must remain closed except when filling or emptying.
6. Any yellow or brown grease or other oils poured or discharged directly into the FSE sewer lines or Metro Water Services sewer system constitutes a violation of this ordinance.
7. Owners of Commercial Property will ultimately be held responsible for wastewater discharges from leaseholder on their property. (See section VI.4.e)

IV. Grease Control Equipment Certification Requirement

1. All establishments with grease control equipment must have their grease interceptor or grease trap inspected and certified annually.
 - a. Certification can only be performed by a Metro Water Services certified inspector that has completed and passed Metro Water Services' *Grease Control Equipment (Grease Interceptor / Grease Trap) Certification course* available online at www.greasetrapclass.com and remain in good standing. (See Section X.5)
 - b. If a grease interceptor or grease trap "Passes" the certification requirement, then no further action is required.
 - c. If a grease interceptor or grease trap "Fails" the certification requirement, then a corrective action response is required from the FSE owner or authorized representative to Metro Water Services.
 - d. Completed certification forms {Grease Interceptor Certification (Form A) or Grease Trap Certification (Form B)} must be completed and signed by the "certified" grease waste

hauler or plumber, as well as the FSE owner or authorized representative, then submitted to the Department.

2. Failure of a Grease Interceptor/Trap Certification: The FSE owner or authorized representative is responsible for including detailed “Corrective Action Response” information on the Certification form that is submitted to Metro Water Services. If necessary, additional pages may be attached to the certification form. At a minimum, the “Corrective Action Response” information must include the reason for the failed certification, what corrective action will be taken to address the failure, and the date the corrective action will be completed.
3. It shall be a violation of the Metro Sewer Use Ordinance to push or flush the non-water portion of GCE into the public sewer.

V. Grease Control Equipment Plans Review and Sizing

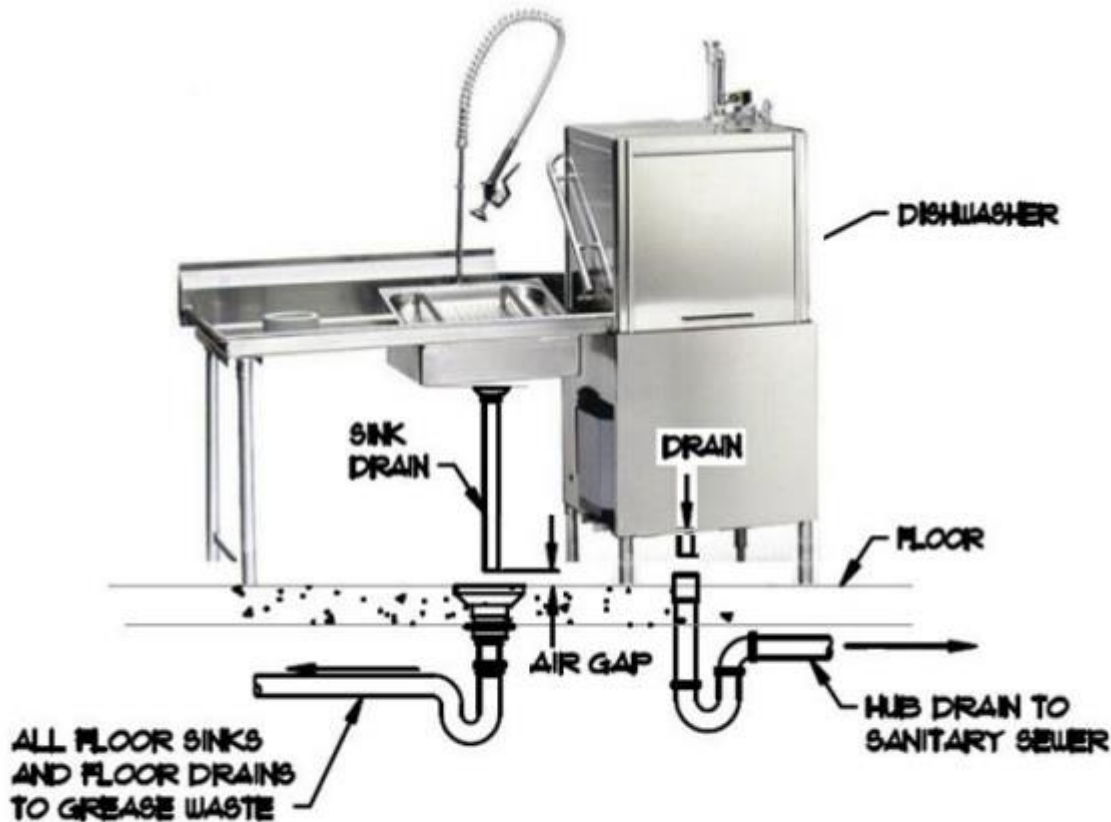
1. Any new food service establishment, upgrading of an existing food service establishment, or change of ownership of an existing food service establishment will be required to install and maintain Metro Water Services-approved grease control equipment. Food service establishments in all FSE Class (Class 0 through 5) categories must submit a FOG plan to Metro Water Services for approval. The FOG plan includes completion and submittal of the Metro Water Services’ “Sewer Discharge Compliance Application” and shall include:
 - a. Identification of all cooking and food preparation equipment
 - b. The number and drain sizes of dishwashers, sinks, floor drains, and other kitchen plumbing fixtures;
 - c. The type of FSE classification;
 - d. FSE menu or style of offerings;
 - e. Plans/drawings for the grease control equipment dimensions and location.

Metro Water Services will review the FOG plan and grease control equipment sizing. Metro Water Services will approve or make changes as necessary to aid in the prevention of a FOG discharge from the FSE.

2. New construction of FSEs shall have separate sanitary (restroom) and grease waste lines. The grease waste lines shall be plumbed to appropriately sized grease control equipment (GCE). No sanitary wastewater or stormwater shall be plumbed to the GCE.
3. All FSEs will meet these FOG Management Policy fixture requirements.
 - a. Fixtures that must drain to GCE:
 - i. All working sinks in any food prep area that will contact food or waste
 1. 3 compartment
 2. 1 or 2 compartment “prep”, “vegetable rinse”, etc.
 - ii. Drains exclusively used for beverages that contain fats or colloidal solids.
 1. Tea/Coffee makers, espresso, horchata, lassi, milk frother rinsing.
 2. Any containing peanut butter, olive oil, avocado, coconut
 3. Milkshakes/Dairy
 4. Soda machines, fruit juices, or alcohol-only bars are excluded.

- iii. Refuse washing
 - 1. Can wash
 - 2. Mop sinks used to clean kitchen/food prep or dining area, etc.
 - iv. Floor drains and floor sinks
 - 1. Any food prep area
 - 2. Any food storage areas
 - v. Dishwashers (*See illustration, Figure 1.*)
 - 1. Pre-rinse sink
 - 2. Automatic dishwasher must be routed to sanitary sewer.
 - a. This policy constitutes a deviation from IPC 2018.
 - b. Exceptions may be granted if grease interceptor has at least 500 gallons of additional capacity over guidelines set in Section VI.1 below.
 - c. Exceptions granted/required at MWS discretion.
 - vi. Hand sinks
 - 1. Any hand sink in front-of-house in a coffeeshop.
 - 2. Additional hand sinks may be routed to grease or sanitary.
 - 3. Exceptions granted/required at reviewer's discretion.
 - b. Fixtures PROHIBITED from draining to GCE
 - i. Restroom/lavatory drains or fixtures must not be connected to the grease waste system.
 - ii. Condensate or ice melt
 - 1. In food prep area these must be hub/flanged one inch (1") above finished floor.
 - 2. Trench drains before ice machines are floor drains and must drain to grease.
 - iii. Laundry/Linens
 - iv. Automatic dishwashers to hydromechanical grease traps. (See Section IX.5)
4. Variance to Grease Interceptor Installation: At the discretion of the Director, some FSEs may receive a variance from this policy regarding any requirements of the installation of a grease interceptor. This variance must be requested during the application/plans review process. If the variance is approved, Metro Water Services will provide a waiver document printed on Department letterhead and signed by the Director or his designee. The Director reserves the right to revoke this variance at any time for any reason.
5. Rough-In and Final Approval of Grease Control Equipment: All new FSEs and FSEs that are renovating their facilities, or FSEs that are changing ownership must contact Metro Water Services for rough-in and final approval of the grease control equipment (Sewer Discharge Compliance). Approval will include onsite inspection of the grease control equipment by Metro Water Services, or their authorized representative. Failure of the FSE to contact Metro Water Services to conduct the required inspections of the new GCE may result in costly corrective measures and appropriate enforcement action.

Figure 1



DETAIL OF PIPING AT DISHWASHER

SCALE: NONE

VI. Grease Control Equipment Sizing

1. **Minimum** acceptable size of grease control equipment for each FSE Classification will be as follows:
 - a. **Class 0:** MFU – 10gpm/20 pounds
 - b. **Class 1:** Small Shop – 20gpm/40 pound Grease Trap.
Exception to Class 1 are doughnut shops with on-premises baking and large coffee shops, which are classified as Class 2 facilities.
 - c. **Class 2:** Limited Service – 20 gpm/40 pound Grease Trap to 1,000 gallon Grease Interceptor to be determined by Department
 - d. **Class 3:** Full Service – 1,500 gallon Grease Interceptor
 - e. **Class 4:** Buffet and Cafeteria Facilities – 2,000 gallon Grease Interceptor

f. **Class 5: Institutions – 2,000 gallon Grease Interceptor**

A variance to the above minimum sizes may be granted by Metro Water Services if proper justification is provided.

2. To calculate the appropriate size GCE, the FSE's engineer, architect, licensed plumber or contractor should use a formula that considers all cooking and food preparation equipment, all kitchen plumbing fixture units, the discharge plumbing pipe for each fixture unit, storage capacity, type of facility and an adequate retention time. The grease control equipment minimum acceptable size for the above listed FSE classifications (Class 0 through 5) shall be met.
3. Retention time through the grease interceptor should be at least 30 minutes to one hour.
4. The Department will review GCE sizing information received from the completed "Sewer Discharge Compliance Application" from the FSE's engineer, architect, or contractor. The Department will approve or require additional grease interceptor volume based on the type of FSE, the number of fixture units, and additional calculations. If the grease interceptor calculated capacity exceeds typical grease interceptor volume specifications, the FSE shall install an additional interceptor of the appropriate size. If additional interceptors are required, they shall be installed in series, not to exceed two units. When choosing grease interceptor volume, care must be given to ensure entire volume will regularly be removed in a single maintenance event. (see VIII.2 below, no Partial Pumping)
5. Grease interceptors that are installed in series shall be installed so that the inlet of each successive tank shall be a minimum of 2 inches below the outlet of the preceding tank to maintain positive flow. Care must be taken in planning phase to ensure there is also positive flow into the sanitary sewer.

VII. Grease Interceptor Design and Installation

1. Piping Design
 - a. The inlet and outlet piping shall have 2-way cleanout tees installed upstream and downstream of the grease interceptor.
 - b. The inlet piping shall enter the receiving chamber 2 1/2" above the invert of the outlet piping.
 - c. On the inlet pipe, inside the receiving chamber, a sanitary tee of the same size pipe in the vertical position with the top unplugged shall be provided as a turndown. To provide air circulation and to prevent "air lock", a pipe (nipple) installed in the top tee shall extend to a minimum of 6" clearance from the interceptor ceiling, but not less than the inlet pipe diameter. The nipple must allow for visual inspection of the inlet flow. A pipe installed in the bottom of the tee shall extend to a point of 2/3 the depth of the tank. The inlet tee should be made of Schedule 40 PVC or equivalent material. *See illustration, Figure 2.*
 - d. The outlet piping shall be no smaller than the inlet piping, but in no case smaller than 4" internal diameter.

- e. The outlet piping shall extend to 12” above the floor of the interceptor and shall be made of a rigid material. The minimum requirement for outlet piping is Schedule 40 PVC.
- f. The outlet piping shall contain a tee installed vertically with a pipe (nipple) installed in the top of the tee to extend to a minimum of 6” clearance from the interceptor ceiling, but not less than the pipe diameter, with the top open. The nipple must allow for visual inspection of the outlet flow. The minimum requirement for the outlet tee is Schedule 40 PVC. *See illustration, Figure 2.*
- g. The inlet and outlet pipe must be sealed on the interior of the interceptor using hydraulic cement or other corrosion-resistant material as it enters or exits the interceptor chamber.
- h. **REMOTE SUCTION requirements:** if remote suction is approved for a grease interceptor the suction pipes must be installed per the manufacturer’s recommendations, but at no point to exceed a combination of either 15’ vertical rise or 200’ horizontal run on a sliding scale. Only four (4) bends are allowed to be either 45° or long-bend wide-radius 90° (12” minimum). The suction lines shall be run separately ending with a metal female type “D” camlock and plug with the same accessibility requirements as defined in section VII.3 and VII.4.a of this policy. A water supply shall be provided at the manholes to wash the grease to the internal beginning of the suction line. At inspector’s discretion, a test of remote suction may be required. For this test, a 90-day temporary permit is issued to allow operation of the FSE. After the GCE is at 25% capacity the inspector must witness pumping of grease interceptor via remote suction to confirm full functionality in order to provide Final Approval per section V.5 of this policy.

2. Baffles

- a. The grease interceptor shall have a rigid baffle the full width of the interceptor, sealed to the walls and the floor, and extend from the floor to within 6” of the ceiling. The baffle shall have an inverted 90° sweep fitting at least equal in diameter size to the inlet piping, but in no case less than 4” internal diameter. The bottom of the sweep shall be placed in the vertical position in the inlet compartment at the same depth as the inlet tee. The sweep shall rise to the horizontal portion, which shall extend through the baffle into the outlet compartment. The baffle wall shall be sealed to the sweep. *See illustration, Figure 2.*
- b. The inlet compartment shall be 2/3 of the total liquid capacity with the outlet compartment at 1/3 liquid capacity of the interceptor.

3. Access Openings (Manholes) *See illustration, Figure 2.*

- a. Access to grease interceptors shall be provided by a minimum of 1 manhole per interceptor division (baffle chamber) and of 24” minimum and 26” maximum dimensions with cast iron frame and cover terminating at a minimum of 1” above finished grade in unpaved areas or at finished grade in pedestrian or vehicular right-of-way. An 8” thick concrete pad extending a minimum of 12” beyond the outside dimension of the manhole frame shall be provided. One manhole shall be located above the inlet tee

hatch and the other manhole shall be located above the outlet tee hatch. A minimum of 48" of clear opening above each manhole access shall be maintained. If interceptor is located above grade, permanently installed stairs, steps, or ladder shall be required.

- b. Access openings shall be mechanically sealed and gas tight in a manner that permits regular reuse to contain odors and bacteria and to exclude vermin and ground water.
- c. Manhole covers must be manufactured from cast iron, except in cases where the access is at least 4' above grade.
- d. The manholes are to be accessible for inspection by the Department at all times. Manholes must be accessible by a single individual using standard tools of the trade.

4. Additional Requirements

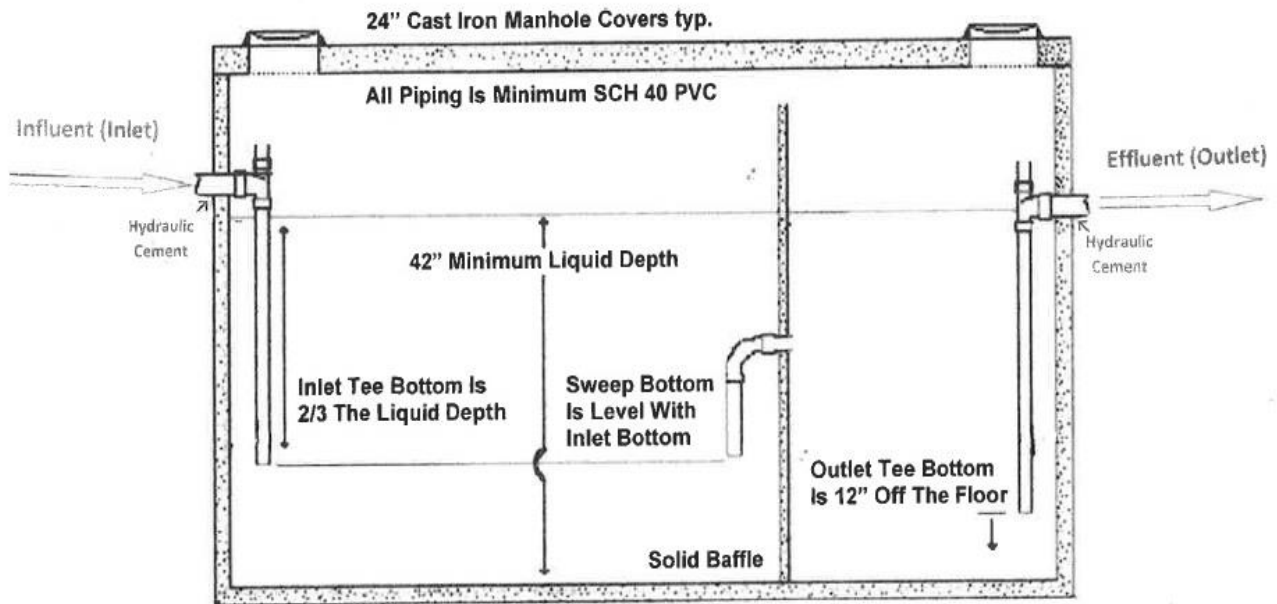
- a. **Location** – Grease Interceptors shall be located to be readily accessible for cleaning, maintenance, and inspections. Location must include a minimum 11'6" of clearance for grease waste hauling vehicles. The distance from the floor of the grease interceptor to grade must not exceed 15'. If possible, Grease Interceptors should not be installed in "drive-thru" lanes. Grease Interceptor manholes shall never be paved over.
- b. **Risers** – As few risers as possible should be used to bring the manholes to grade to reduce seams and leak points, totaling no more than three (3) in number. All risers shall be straight vertically and not obstruct any part of the manhole opening of the grease interceptor. All concrete joints shall be sealed with two strips of butyl concrete sealant, whereas plastic and fiberglass joints shall be sealed with one-component polyurethane based or silane-terminated polymer based sealant. When the riser length to grade is greater than 5', then 4' wide ID barrel risers with integrated ladder rungs and offset manholes are required.
- c. **Fill** – Grease interceptors shall be installed per the manufacturer's recommendation but at no point on less than a 6" bed of #57 or smaller gravel. All backfill shall be the same make as the bedding material and be a minimum of 6" thickness around the interceptor. Concrete ballasts and collars are allowed to prevent floating per the engineer's or manufacturer's requirements.
- d. **Temperature** – Follow IPC guidelines for preventing discharge pipes from freezing. In circumstances where heat-tracing insulation is required, it must be limited to 5 watts per foot and not to exceed 80 watts total to prevent liquified FOG from passing through the GCE.
- e. **Responsibility** – Removal of the grease from the wastewater routed to a public or private sanitary system is ultimately the responsibility of the property owner. This does not preclude contracts and agreements between the permit holder and the property owner, but when in dispute the Department will defer responsibility to the property owner.
- f. **Construction Material** – Grease Interceptors shall be constructed of sound durable materials, not subject to excessive corrosion or decay, and shall be water and gas tight. Each interceptor shall be structurally designed to withstand any anticipated load to be

placed on the interceptor (i.e. vehicular traffic in parking or driving areas).

- g. Leak inspections are required for all newly installed grease interceptors.
 - 1. Visual – Grease interceptor is set and filled with water up to the outlet, and made to rest for 24-hours. The full height of all four lateral sides must be visible with 6-inches clearance from its surroundings. Pit must be free of groundwater or stormwater. Inspector will visually inspect for leaks by looking for wetness.
 - 2. Vacuum – Grease interceptor must be completely empty. All openings must be sealed to be gas tight. Using a vacuum manhole tester plate and vacuum pump, the pressure of the grease interceptor must reach -10 inHg. Pressure must be measured using liquid-filled gauge calibrated by certified metrologist within past calendar year (proof must be provided at time of test). Pressure must not drop more than -1 inHg within 1 minute after vacuum valve closed. (Test derived from ASTM C1244/C1244M-20)

Note: Concrete materials and other grease interceptor materials shall meet the American National Standards Institute, Inc. (ANSI) and International Association of Plumbing and Mechanical Officials (IAPMO) standards.

Figure 2. - Gravity Grease Interceptor – Required Design



The tank shall be of a monolithic body design, separated by a solid baffle into 2/3 total capacity inlet chamber and 1/3 total capacity outlet chamber. It shall have a 24" minimum access opening over each drop tee. Flow through the baffle will be provided by a 90° sweep. All perforations and seams shall be sealed with hydraulic cement or welded. All piping shall be a minimum of solvent-welded schedule 40 PVC. All parts of the system shall be made water and gas tight from two-way cleanout upstream to two-way cleanout downstream of tank, including any risers to grade. Venting will be provided as necessary.

VIII. Grease Interceptor Cleaning/Maintenance Requirements

1. **Cleaning / Pumping** – Grease interceptors must have the complete contents of both chambers pumped or cleaned at a frequency of not less than once every 90 days unless approved by the Department. Grease interceptors fitted with an operational DMD and/or DMA may be approved to pump less frequently but under no circumstances less often than once every 180 days. Grease interceptors must have a complete pump of contents when the total accumulations of surface FOG (including floating solids) and settled solids combined reaches twenty-five percent (25%) of the grease interceptor's overall liquid depth. This criterion is referred to as the "25 Percent Rule". Grease interceptors may only be cleaned by approved Grease Waste Haulers who have signed onto Metro Water Services Grease Waste Hauler Agreement (see section XV.)
2. Partial pump of interceptor contents or on-site pump and treatment of interceptor contents will not be allowed due to reintroduction of FOG to the interceptor and pursuant to 40 CFR § 403.5(b)(8), which states "*Specific prohibitions. In addition, the following pollutants shall not be introduced into a POTW: Any trucked or hauled pollutants, except at discharge points*

designated by the POTW”.

3. Grease interceptor inlet and outlet tees will be inspected during cleaning and maintenance and the condition noted by the grease waste hauler. The grease waste hauler will contact the FSE representative to make them aware of any defects identified. Tees that are loose, defective, or not attached must be repaired or replaced immediately.
4. Grease Interceptors must pass the Grease Interceptor Certification (Form A) inspection annually. This inspection can only be completed by a Metro Water Services approved inspector. Inspectors must complete training online at www.greasetrapclass.com, which is available to residents of Nashville free of charge. Approval expires after five years.

IX. Grease Trap Requirements

1. All FSEs that install grease traps must have Metro Water Services approval prior to installation. (See Section V.1 and VI.4)
2. All grease traps must meet PDI G101 standards.
 - a. Grease traps that meet both PDI and ASME standards must be installed per the PDI requirements.
 - b. Grease traps with horizontal baffles are not allowed.
 - c. Grease traps must be passive in design and operation. Automatic grease traps are acceptable only for supplementary use upstream of an approved grease trap.
 - d. During cleaning of a PDI grease trap, the flow restrictor shall be checked to ensure it is attached and operational.
3. Grease Trap minimum size requirement is a **20 gallon per minute / 40 pound capacity trap**
 - a. Exception of 10 gallon per minute / 20 pound made for *Class 0*: Mobile Food Units.
 - b. Exception of 10 gallon per minute / 20 pound made for mop sinks or other remote fixtures unable to be plumbed to main line that drains to minimum 20 gpm /40 lb.
4. Grease traps must be plastic, fiberglass, or otherwise non-corrodible if recessed into floor or ground. Epoxy-coated or "corrosion-resistant" metals are not acceptable for this purpose.
5. No automatic dishwasher shall be connected to an under-the-sink or in-floor grease trap. Dishwashers will cause hydraulic overload of the grease trap. (See Section V.3.b.iv)
6. No automatic drip or feed system additives are allowed prior to entering the grease trap.
7. Each significant kitchen fixture unit must be plumbed to a grease trap. Number of fixtures will determine size and number of grease traps. The plumbing must be approved prior to installation.

8. Grease Traps will be cleaned of complete fats, oils, and grease and food solids at a minimum of every 30 days. If the FOG and food solids content of the grease trap are greater than 25%, then the grease trap must be cleaned every two weeks, or as frequently as needed to prevent 25% of capacity being taken from FOG and food solids. Based on inspection results, Metro Water Services may require more frequent cleaning of the grease trap, or upgrade of the grease control equipment.
9. Grease Trap waste must be sealed or placed in a container to prevent leachate from leaking, and then be properly disposed of as per Federal, State, and local regulations.
10. Grease Trap waste (brown grease) should not be mixed with yellow grease in the grease recycle container.
11. Grease Traps must pass the Grease Trap Certification (Form B) inspection annually. This inspection can only be completed by a Metro Water Services approved inspector. Inspectors must complete training online at www.greasetrapclass.com, which is available to residents of Nashville free of charge. Approval expires after five years.

X. Accidental Discharge Prevention and Best Management Practices

FSEs shall provide such facilities and institute such procedures as are reasonably necessary to prevent or minimize the potential for accidental discharge of FOG into the sanitary sewer collection system. FSEs shall implement Best Management Practices to prevent the discharge of FOG to the sanitary sewer system. Examples of BMPs include:

1. Recycle waste cooking oil; dispose in Grease Recycle Bin or Container. Do NOT pour any grease into sinks, floor drains, mop sinks, or storm drains.
2. Post “NO GREASE” signs above all kitchen sinks to remind employees.
3. “Dry Wipe” and scrape into a trash container as much food particles and grease residue from pots, pans, and plates as possible.
4. If an oil or grease spill occurs, clean up using “dry” oil absorbent material or use ice to make grease solidify. Scoop up and dispose into a trash container. Do NOT wash oil or grease into drains.
5. Dispose of food items in the trash. Food grinder / garbage disposal use is prohibited unless directly fixed to a solids separator device due to build up of solids in the GCE which causes decreased efficiency and increased maintenance of the GCE.
6. Educate and train all employees on grease control and preventing clogs and overflows.

XI. “Additives” Prohibition for use as Grease Management and Control

The use of additives for Grease Management and Control is prohibited with the following exception: Mild household drain cleaners may be used intermittently to clean the FSE drain lines but only in such quantities that will not cause FOG to be discharged from the grease control

equipment to the sewer system or cause temporary breakdown of FOG that will later re-congeal in the downstream sewer system.

Additives include but are not limited to products that contain solvents, emulsifiers, surfactants, caustics, amino acids, enzymes, and bacteria.

XII. Right of Entry – Inspection and Monitoring

The Department or their authorized representative shall have the right to enter the premises of FSEs to determine whether the FSE is complying with the requirements of this policy and/or the Metro Water Services Sewer Use Ordinance. Upon presentation of proper credentials, FSEs shall allow Department personnel full access to all parts of the premises for the purpose of inspection, monitoring, and/or records examination. The Department may require the FSE to notify the Department 24 hours prior to any pumping, cleaning, maintenance, or certification of the grease control equipment so the Department can do a visual inspection of the total grease control equipment tank. The Department may require the FSE to schedule pumping of their interceptor if the Department determines that the interceptor may be defective or there is chronic FOG obstruction in the downstream sewer from the FSE. Unreasonable delays in allowing Department personnel access to the FSE premises shall be a violation of this policy and the Metro Water Services Sewer Use Ordinance.

XIII. Permits and Fees

1. The Department may charge inspection, monitoring, assessment, impact, and permit fees to the FSE to offset costs for the FOG program.
2. The Department may issue individual permits or general permits to FSEs. Individual permits or general permits may be issued for a period or duration of up to 5 years. All new FSEs shall complete the Department's Sewer Discharge Compliance Application and submit the form to the Department, which will serve as the FSE's permit application. The Department's routine FOG inspection form will serve as the permit reapplication for existing FSEs.

XIV. Enforcement Action

1. Non-compliance with any requirement and/or provision of Metro Water Services Sewer Use Ordinance or this FOG Management Policy will result in Enforcement Action as per the SUO and the FSE Enforcement Response Guide. The FSE may be required to reimburse the Department for all labor, equipment, supplies and disposal costs incurred by Metro Water Services to address the non-compliance. The charges may be remitted via cashier's check, money order, or added to the FSEs water/wastewater bill. Failure to reimburse Metro Water Services may result in termination of water service.
2. Penalties will be issued as per the FSE Enforcement Response Guide, and the Metro Water Services Sewer Use Ordinance.
3. Any enforcement action or penalty may be appealed to the Waste Water Hearing Authority.

XV. Grease Waste Hauler Agreement

All trucked or hauled grease waste in the service area may only be transported by companies that have the appropriate permits and bonds, and have also signed onto the Grease Waste Hauler Agreement. In brief, the signatories agree to:

1. Service/Pump/Clean the grease interceptor or grease trap of its complete contents. This includes all FOG, food solids, and the water portion of the interceptor or trap.
2. Provide a manifest or record of grease interceptor or grease trap pumping to the client FSE and that record will include at a minimum: Date and time pumped, volume pumped (in gallons), name of FSE, and address of FSE
3. Provide written documentation to the FSE management of any problems or defects found in the grease interceptor or grease trap.
4. Provide a monthly pump report to Metro Water Services with all information listed above.

Grease Waste Haulers who are non-compliant with the agreement are subject to penalties set in its corresponding Enforcement Response Guide.