



**MODIFIED FATS, OILS, AND GREASE (FOG)  
PROGRAM PLAN**

**FOR THE  
WASHINGTON SUBURBAN SANITARY COMMISSION**

**August 2018**

**Modified FOG Program Plan-2018  
Table of Contents**

**Introduction**

- I. Food Service Establishment Inspection Criteria**
  - 1. Inspection Prioritization**
  - 2. Recommended Inspection Protocols**
  - 3. Recommended Inspection Frequency**
  - 4. Implementation Schedule for Inspection Prioritization, Protocols, and Frequencies**
  
- II. Statutory and Regulatory Changes to Address FOG Program Deficiencies**
  - 1. Statutory Authority**
  - 2. Regulatory Changes**
  
- III. Recommendations for FOG Operations and Maintenance**
  - 1. Best Management Practices (BMPs)**
  - 2. On-site Recordkeeping Requirements**
  - 3. Maintenance and Cleaning Frequency**
  - 4. Cleaning Standards**
  - 5. Use of Additives**
  - 6. Requirements for the Ultimate Disposal of Removed Grease**
  
- IV. Notification Program for New Food Service Establishments**
  
- V. Enforcement**
  - 1. Timely Notification of Violations**
  - 2. Escalation of Enforcement Actions**
  - 3. Schedule for Implementation of Enforcement Recommendations**

- VI. Background and Updates to FOG Blockages Caused by Older Food Establishments and Multi-Person Residential Buildings not required to have Grease Abatement Devices**
- VII. Public Education, Outreach, and Compliance Efforts**
  - 1. Residential Marketing**
  - 2. Food Service Establishment Marketing**

## **Appendices**

- A. Enforcement Response Plan (2017 Update)**
- B. Effectiveness of the FOG Program Report (2012)**
- C. Consultant study of FOG related SSO's and applicable blockages**
- D. WSSC Waste Hauler Permit General Conditions including cleaning performance requirements**
- E. Typical inspection/enforcement/monitoring forms used in 2017 (illustrative only)**
- F. Existing WSSC Modified FOG Program Plan (2008 Amended)**

## Introduction

The Washington Suburban Sanitary Commission (WSSC) is a bi-county water and sewer authority serving Prince George's and Montgomery Counties in Maryland. The WSSC entered into a Consent Decree for the control of Sanitary Sewer Overflows (SSOs) with the United States Environmental Protection Agency (USEPA), the Maryland Department of the Environment (MDE), and various citizens' groups on December 7, 2005 (Date of Entry).

The report contained herein is submitted in relation to and as an update to Article Three B.5.b of the Consent Decree and details a 2017 WSSC's Modified Fats, Oils and Grease (FOG) Program Plan.

**NOTE:** *The original Modified FOG Program Plan was created in 2006 and amended in November 2008 to reflect changes to WSSC's Plumbing and Fuel Gas Code and other policy changes. At that time, deletions were indicated by strikethrough which remained in the amended plan. Additions were in red.*

The WSSC continues to remain in compliance with the Article Three requirements. In addition, the WSSC has amassed nearly ten years of experience implementing and following the guidelines and recommendations of the original 2006 and the 2008 amended Modified FOG Program. The WSSC proposes an updated 2017 Modified FOG Plan to better reflect the levels of effort needed for monitoring the Food Service Establishment sector to minimize FOG-related blockages.

As a result of the documentation and processes that WSSC has in place, the technology implemented, and with our commitment to responsible FOG management, the WSSC is proposing the modifications contained herein. The document has been re-written, and re-organized in its entirety with the 2008 Amended version attached as Appendix F.

Important background information about the original Modified FOG program and its implementation and execution during its first ten years is given below.

### **1. What WSSC knew in 2005 during Consent Decree negotiations:**

- a. The majority of our SSOs were FOG-related.
- b. WSSC employee accounts of grease related incidents downstream or at food service establishments (FSEs), especially in the Route 1 corridor.
- c. WSSC employee accounts of problem apartment complexes with FOG blockages.
- d. FOG Programs country-wide focused mostly on FSE contributions through regulation.

- 2. What WSSC did not know prior to 2005 and during Consent Decree negotiations:**
- a. The exact location of every FOG-related blockage in relation to upstream FSEs or Multi-Family Dwelling Units (MFDUs).
  - b. Exactly how many FSEs there were in the WSSD, how many had a Grease Abatement Device (GAD) required; still had their GAD; still used their GAD; and still maintained their GAD.
- 3. Article Three of the 2005 Consent Decree, therefore, covered:**
- a. Language that was heavily weighted towards the theory that reducing or preventing FOG-related SSOs is accomplished by holding (FSEs) more 'accountable' for their discharges (i.e. FSEs were the main problem).
    - The corresponding Modified FOG Program is similarly focused primarily on the FSEs with only general ideas about public education and Multi-Family Dwelling Unit (MFDU) / residential contributions
    - An Enforcement Response Plan (ERP) with minimal structure and some very difficult options to execute.
- 4. As of late 2016, WSSC had *ten calendar years* of data giving us the background we need to propose changes to the FOG-related SSO focus. WSSC now knows:**
- a. The majority of our SSO causes remain FOG-related (26% in 2015), but not as high a percentage as in 2006 (38% caused by FOG).
    - And for 2016, FOG-related causes of SSO's dipped to 21%.
  - b. The exact location of *every* FOG related blockage in relation to an upstream FSE and/or an MFDU (found through the WSSC GIS programs)
  - c. Over 2/3rds (66%) of the time there are no FSEs and/or MFDUs anywhere upstream.
  - d. Exactly how many FSEs there are in the WSSD (>6500); how many have a Grease Abatement Device (GAD) required or were required to add or retrofit (>4800); still have their GAD; still use their GAD; and still maintain their GAD.
    - 100% of those FSEs that have been identified as needing a GAD have installed or are in the enforcement process to install a GAD.
  - e. Exactly how many FSEs are non-compliant with the WSSC Plumbing and Fuel Gas Code and/or their FOG Discharge Permit for any reason today (12%) vs. when the program officially started in 2007 (67%)

- **TEN YEARS DATA FOG RELATED BLOCKAGES\***

| <b>Calendar Year</b>     | <b>SSO** Count</b> | <b>Blockage*** Count</b> |
|--------------------------|--------------------|--------------------------|
| 2006                     | 78                 | 100                      |
| 2007                     | 42                 | 78                       |
| 2008                     | 57                 | 73                       |
| 2009                     | 57                 | 75                       |
| 2010                     | 43                 | 70                       |
| 2011                     | 48                 | 75                       |
| 2012                     | 41                 | 63                       |
| 2013                     | 52                 | 62                       |
| 2014                     | 44                 | 57                       |
| 2015                     | 32                 | 58                       |
| <b>Total</b>             | <b>492</b>         | <b>711</b>               |
| <b>10 yr % reduction</b> | <b>60</b>          | <b>42</b>                |

**\*Source: Black and Veatch December 2016 Tech Memo from WSSC generated database.**

**\*\*SSO=Sanitary Sewer Overflow caused by FOG**

**\*\*\*Blockage (includes Backups) caused by FOG in a mainline that may or may not have caused an SSO and/or one or more backups in laterals or other connection. Therefore, these numbers are lower than the *total* backup count**

## **I. Food Service Establishment Inspection Criteria**

### **1. FOG Inspection Prioritization**

The WSSC was required, and executed, initial inspections of all of the approximately 6,700 Food Service Establishments (FSEs) in its 2007 database and prioritized them accordingly. This prioritization continues on an annual basis using both the Prince George’s and Montgomery County Health Department’s permit database. As a result, the WSSC currently proactively regulates approximately 4,800 of the 6,500 FSEs that are currently permitted by the health departments. The remaining (approximately 1,700) do not require oversight as they fall in Category I of WSSC’s review criteria (explained below).

The WSSC will continue to use the following criteria to determine inspection and permitting status:

***Category I - No FSE Discharge Permit or Grease Abatement Requirements***

- a. The business does not sell food of any kind, or
- b. The business sells only packaged food and drink. There is no active food preparation, kitchenware cleaning or cooking, or
- c. The food prepared does not contain FOG

***Category II - Best Management Practice (BMP) Permit (Must comply with WSSC BMP requirements)***

- a. Any business the Commission deems to have a minimal (<100 mg/L discharge) FOG discharge from food prep based on menu, kitchen fixtures, and dishwashing practices.

***Category III – FSE FOG Discharge Permit (Must comply with BMP requirements and Grease Abatement System Requirements in the Permit)***

- a. All other FSEs that do not meet the criteria listed in Categories I and II above.

Inspection status is determined using one or more criteria including the prioritization factors.

The WSSC prioritizes FSEs based on the following factors:

- a. Previous compliance history of the FSE;
- b. FSE proximity to a section of the public sewer system susceptible to, or has experienced, a FOG blockage (i.e. including hot spots);
- c. FOG discharge potential due to menu, kitchen fixtures, and dishwashing practices;
- d. Cleaning/maintenance risk of the installed grease abatement device(s).

**2. Recommended FOG Inspection Protocols**

FOG Investigators will perform and document all FSE inspections in accordance with inspection procedures applicable to the FSEs particular circumstances, including, but not limited to: initial (first-time), routine, follow-up, violation, plumbing inspection or consultation, and with the guidelines given in Chapter 8 of the WSSC Plumbing and Fuel Gas Code.

Regular inspections will always include the following minimum items:

- a. Assurance that all required kitchen fixtures are served by the grease abatement system(s);

- b. No unauthorized fixtures or equipment discharge to the grease abatement system(s);
- c. The grease abatement system(s) remains adequately sized for the connected fixtures;
- d. The grease abatement system(s) is in operating condition;
- e. The grease abatement system(s) is being properly maintained;
- f. There is no evidence of illicit dumping of grease;
- g. All required records of grease abatement system maintenance have been retained;
- h. FSE is executing Best Management Practices (BMPs) for controlling FOG.

For example, initial routine inspections shall include the following:

- a) All required kitchen fixtures are served by a grease abatement system;
- b) No unauthorized fixtures or equipment discharge to the grease abatement device;
- c) The grease abatement system(s) is adequately sized for the connected fixtures;
- d) The grease abatement system(s) is in operating condition;
- e) There is no evidence of illicit dumping of grease;
- f) Waste grease from wok stoves, deep fat fryers, and grills is being properly collected and disposed;
- g) Waste grease barrels are in good condition and properly stored;
- h) Wastewater from hood cleaning operations is collected and properly disposed (this issue will be discussed with the FSE owner);
- i) FSE owner/operator is aware of proper cleaning and waste disposal methods;
- j) The grease abatement system is being properly maintained. This will be accomplished through measurement of the floating grease and settled solids levels through the use of a Dipstick<sup>®</sup> or similar device. The floating grease and settled solids may not exceed 25% of the liquid retention capacity of the tank (25% rule). The 25% rule shall not apply to the nominal volume of the tank, but to the actual volume of solids, grease, oils, and water in the tank;
- k) All required records of grease abatement system maintenance have been retained;
- l) The sewer system will be inspected for grease accumulation and structural damage using Closed Circuit Television (CCTV) equipment if the site conditions so indicate;
- m) FSEs are implementing Best Management Practices (BMPs) for controlling FOG.



The FOG Investigator will input pertinent data from the inspection into the WSSC proprietary database system in the field using the applicable electronic devices. All evidence of non-compliance will be photographed. All inspection information, including photographs, will be stored in the WSSC proprietary database.

If the investigation warrants, the WSSC FOG Investigators will conduct, or request, a CCTV inspection of the sewer lateral to assess the structural integrity and grease accumulation.

### **3. Recommended FOG Inspection Frequency**

The WSSC completed the required initial 5-year inspection period. The WSSC has also completed 10 years of FSE control, monitoring and inspections procedures, documenting the status of FSEs in accordance with the October 2006 (and 2008 Amended) Modified FOG Program. Since May 2007, over 11,600 FSEs have been investigated for potential inclusion into the FOG Permitting and Control Program, with over 4,800 currently qualifying to be actively regulated.

Based on the historical data previously presented in this document, the WSSC is able to determine inspection frequencies based on its experience with FSE location vs. hotspot; the FSEs length of service, the FSEs compliance history and the FSEs current state of compliance. The WSSC will utilize its technology and FSE inspection experience to perform key inspections and to set frequencies.

The WSSC will concentrate most of its current FOG Unit inspection staff for, but not limited to, the following FSEs (includes every FSE is the current WSSC active FSE inventory)

- High Priority-twice annually
- Medium Priority-annually
- Low Priority (BMP Permits)-biennial
- Exempt (from GAD installation and have no FOG potential)-as needed

Example FSE inspections include, but are not limited to:

- New, or any previously uninspected, FSEs based on the annual Health Department listings.

- New, or any previously uninspected, FSEs the staff may observe during routine annual inspections in their assigned area.
- FSEs currently in non-compliance.
- FSEs directly upstream of any FOG-related blockage within the past three years (may be limited to 0-5000 feet upstream).
- Random unannounced inspections at FSEs not due a routine inspection at the time (QA/QC).
- Site specific biennial, triennial or extended frequency inspections.

More frequent inspections may be warranted if the WSSC determines that an SSO could have been caused by one or several upstream FSEs whose location or operational characteristics warrant an increased frequency. If the WSSC determines that the FSE has been following all FSE discharge permit and maintenance directive requirements, and there is no evidence of grease pass-through to the sewer, the inspection interval may be increased.

Inspection frequencies for specific FSEs will be included in the WSSC Proprietary database.

#### **4. Implementation Schedule for Inspection Prioritization, Protocols, and Frequencies**

The WSSC can implement updated procedures described in Section I.3 within 545 days of EPA/MDE approval.

## **II. Statutory and Regulatory Changes to Address FOG Program Deficiencies**

### **Statutory Authority**

Under Maryland Public Utilities Article, the WSSC possesses and will continue to possess the statutory authority to implement and maintain rules and regulations regarding the discharges from FSEs as industrial users.

Regulatory Changes are already present within WSSC's jurisdiction and continue to be an option for improving the FOG program as the WSSC identifies deficiencies.

### III. Recommended Protocols for Permittee's FOG Operations and Maintenance

#### 1. Best Management Practices (BMPs)

As part of the Modified FOG Program Plan, the WSSC will continue to require implementation and execution of BMPs for all permitted FSEs. FSEs will be required to prominently display Kitchen Best Management Practices in food preparation areas. Verifying BMPs will become a routine component of all food service facility investigations. Failure of any FSE to implement BMPs will result in enforcement action. In addition, the WSSC will continue to include the following minimum BMP requirements in all FSE permits:

- a. Scrape plates, utensils, pots and pans prior to washing and dispose of the waste into the trash or food waste recycling container, if applicable. ***Do not dispose of free liquids in the trash.***
- b. Do not pour or scrape or otherwise dispose of fats, oils, or grease into the sink or drains.
- c. Collect fryer oil and store in barrels for recycling.
- d. Dump mop water only to drains connected to your grease abatement system.
- e. Use absorbents to soak up spills containing fats, oils, and grease (FOG).
- f. Use strainers on sinks and floor drains to prevent solid material from entering the sewer.
- g. Post "NO GREASE" signs near sinks and drains.
- h. If you have a mechanical flow-based grease interceptor, empty the collection container *before* it becomes full.
- i. Provide your employees with the proper equipment for cleaning your flow-based grease interceptor.
- j. Wastewater generated from duct/range filter cleaning must be routed through the grease abatement system.
- k. Train all kitchen staff in best management practices for grease disposal and the impacts of grease accumulation in the sewer.
- l. Provide regular refresher training/discussion for proper disposal of fats, oils, and grease for all employees.
- m. Inspect grease abatement devices/interceptors after pumping to ensure adequate cleaning was performed.

#### 2. On-site Recordkeeping Requirements

All FSEs will continue to be required to retain on-site any records and invoices associated with grease abatement system maintenance, operations, and Best Management Practices (BMPs). Grease abatement system maintenance logs will be a standard WSSC form that contains the following information:

**Contracted cleaning:**

- a. Use of the WSSC Waste Hauler Grease Manifest form.

**FSE Self-cleaning (<50 gpm units only):**

- a. Date and time of inspection and maintenance;
- b. Sludge, water and grease levels;
- c. Maintenance performed (description);
- d. Comments: any notes or explanation regarding this inspection.

The logbook shall be made available to a WSSC FOG Investigator upon request and records shall be kept for a minimum of three years.

**3. Maintenance and Cleaning Frequency**

The cleaning frequencies will vary from FSE to FSE, depending on the amount of FOG being discharged to the grease abatement device (which is dependent on the types of foods being processed and how well BMPs are followed). Cleaning frequencies will also be determined by the type of grease abatement equipment in use. The cleaning frequency of all grease abatement devices shall be determined by the WSSC and continued to be specified in a Maintenance Directive, or when floating grease and settled solids exceeds 25% of the total volume of the device (25% rule).

The 2018 WSSC Plumbing and Fuel Gas Code reflects the definition of the 25% Rule:

*818.4.2 25% Rule. It shall be the Permittee's/Property Owner's responsibility to ensure that the accumulation of FOG and solids does not exceed 25% of the liquid retention capacity of the Grease Abatement System. If a grease abatement system is specifically designed to function properly with FOG and solids accumulation greater than 25%, the allowable accumulation of FOG and solids may be adjusted by WSSC on a case-by-case basis.*

Cleaning frequencies will be referenced in the WSSC Plumbing and Fuel Gas Code as well as the procedure for an FSE to formally request modification of their cleaning frequency. At the request of the Reviewing Agencies in July 2018, the following language (highlighted in red) concerning **Maintenance and Inspection of Grease Interceptors** will also be incorporated, subject to the normal stakeholder and public review process, into the WSSC Plumbing and Fuel Gas Code in the next Code Cycle (concurrent with the International Plumbing Code-IPC Cycle) after the 2018 Code version:

**Maintenance and Inspection of Grease Interceptors.**

**The minimum maintenance frequency for Volume-Based Grease Interceptors, including cleaning, shall be quarterly, or shall be determined by the**

manufacturers' recommendations, or by the code official's written directive, or by the "25% rule", whichever is more stringent.

Volume-Based Grease Interceptors shall be internally inspected annually by a qualified inspection service to determine needs for additional cleaning, repair work or other maintenance activities.

The minimum maintenance frequency for Flow-Based Grease Interceptors, including cleaning, shall be determined by the manufacturers' recommendations, or by the code official's written directive, or by the "25% rule," whichever is more stringent.

Flow-based Grease Interceptors shall be inspected weekly so as to identify any operational or maintenance issues and to monitor compliance with the applicable maintenance requirements.

Deviation from the required maintenance intervals listed above shall be submitted to and approved or disapproved by the WSSC in writing prior to implementation. WSSC shall maintain a list of all such approved deviations, and shall provide said list to MDE and EPA upon written request.

The WSSC will comply with the **Maintenance and Inspection of Grease Interceptors** procedures outlined in red above vs. any other outlines in the 2018 WSSC Plumbing and Fuel Gas Code.

#### **4. Cleaning Standards**

Contracted cleaning standards will remain a part of the WSSC Waste Hauler Discharge Permit. FSE self-cleaning standards will remain consistent with WSSC enforcement documents.

#### **5. Requirements for the Use of Additives**

The WSSC will continue to enforce the Additive regulations in Section 818 of the WSSC Plumbing and Fuel Gas Code that will allow additives to be used only in special circumstances. Additives can only be introduced to FSE drain lines that connect to grease abatement devices, or added to grease abatement devices directly, if the only active ingredients are bacterial products. This allowance will be conditional and based on a review of product information. Additionally, after the product is approved and in use, if there is evidence that the additive may be interfering with the operation of the grease abatement system, the additive will be disallowed.

#### **6. Requirements for the Ultimate Disposal of Removed Grease**

WSSC's Industrial Discharge Control (IDC) staff will continue to enforce the ultimate disposal regulations, including the manifest system, to assure proper grease disposal and to specify acceptable locations. WSSC will continue to

accept hauled grease at its Muddy Branch Disposal Site until it is moved to another location between 2022-2025. The Muddy Branch Site discharges to a 30-inch sewer trunk line and ultimately discharges to the Blue Plains WWTP in the District of Columbia (DCWATER).

In addition, FSEs will be required to hire a WSSC permitted waste hauler only. This requirement will be enforced through a FSE discharge permit condition. This will increase WSSC's ability to regulate the haulers and enhance the ability to enforce the waste hauler discharge permit conditions regarding grease interceptor cleaning (see Appendix D). The WSSC permitted waste haulers can be required to retain records and make them available to a FOG Investigator upon request.

Grease Interceptors with a volume of 50 gallons or less may be self-cleaned by the permittee. In such cases, all floating grease should be disposed of in accordance with the County approved procedures. The solids should be disposed of in the trash. Solids containing free liquids should be mixed with absorbent material and disposed of in the trash. The remaining contents of the grease interceptor may be discharged to the grease abatement system after the cleaning is completed.

#### **IV. Notification Program for New Food Service Establishments**

New FSEs are notified about the WSSC FOG Program procedures and requirements through one or more avenues including, but not limited to:

- a. When making application to the applicable County Health Department for a food service license;
- b. When making application to WSSC for an FSE plumbing permit (new or replacement FSE);
- c. Upon an initial inspection by WSSCs FOG staff.

Information provided includes:

- a. What is FOG and the FOG Program?
- b. Why is FOG an issue for the Food Service Establishment?
- c. What will the WSSC FOG Investigators be looking for?
- d. How to obtain a FOG Discharge Permit.
- e. List of the WSSC FOG staff Contacts.

## **V. Enforcement**

### **1. Timely Notification of Violations**

The WSSC is employing a proprietary database system. With this system, enforcement actions are issued most times in the field immediately upon discovering a violation. Notices of Violation (NOV) and/or other enforcement documents are prepared, printed, and signed in the field on portable computer equipment.

### **2. Escalation of Enforcement Actions**

All non-compliances will be addressed through the Enforcement Response Plan (Appendix A).

### **3. 2018 Special Enforcement Actions (per the request of the Reviewing Agencies)**

All Food Service Establishments referenced to the Agencies by WSSC who were not yet compliant with the installation of a required GAD shall have a deadline to install their required GAD by December 31, 2018.

## **VI. FOG Blockages Caused by Older Food Establishments and Multi-Person Residential Buildings not required to have Grease Abatement Devices**

Since 2007, using the criteria found in the FOG inspection prioritization's 3 categories (Section I. 1), WSSC has required "retrofits" or "upgrades" to every existing qualifying FSE within the WSSD to bring them up to the latest Code standards for a Grease Abatement System. Using the Utility Services staff, as well as other key WSSC staff and resources and the FOG staff, WSSC has used various means to execute an outreach campaign aimed at informing occupants of multi-unit buildings that are in hotspot areas, or have personally experienced a FOG-related blockage, about the FOG Program. The WSSC has partnered with several organizations over the years in order to distribute literature and heighten awareness of the issues related to FOG. Onsite sewer cleaning and maintenance will follow the policies and procedures of WSSC to assure no jetted or waste material makes its way to the WSSC sewer.

## **VII. Public Education, Outreach, and Compliance Efforts**

The WSSC will continue the “Can the Grease” education and outreach campaign that was adopted by 2007 to include information regarding the original Modified FOG Program Plan. The public education and outreach goals for the FOG Program continue to highlight:

- a. Defining and describing the problem of FOG;
- b. Emphasizing that all customers contribute FOG to the Collection System;
- c. Encouraging all customers to help the WSSC manage FOG issues;
- d. Notifying customers of the importance of preventing FOG blockages to protect property, the environment and public health;
- e. Notifying FSEs of potential enforcement and penalties;
- f. Give detailed information about the FOG Program.

### **1. Residential Marketing/Education**

Various types of education programs have been used since 2007 to explain the FOG program including but not limited to:

- a. Insertion into customer’s quarterly water and sewer bill.
- b. Distribution by WSSC field staff near the sites of blockages.
- c. Partnering with various community groups to distribute outreach materials to multi-unit residences.
- d. Distribution of outreach materials through County Departments of Environmental Protection and the Health Departments.
- e. Distribution to children through the County school systems.
- f. WSSC social media outlets.
- g. Public Service Announcements (PSAs) through radio and television.
- h. Newspaper articles.
- i. Local, regional and national presentations.
- j. Customized local area training or education with field staff in residential areas that have experienced damages from a grease related blockage.

Summaries of the FOG program are found in several foreign languages including Spanish, Korean and Chinese.



The WSSC website continues to be the core information center for the FOG Program and focuses on both residential customers and FSEs.

Promotional Items: Currently, the WSSC uses pens and pan scrapers with the message “Can the Grease” in order to promote the FOG Program. WSSC’s #1 marketing item is the plastic lid that can be placed on any ordinary vegetable can. The intent of the plastic lid is to cover a can full of grease; the grease would then be allowed to cool and solidify. Once solidified, the lid is removed and the entire can with the hardened grease can be thrown into the trash. The lids are given away (over 10,000 per year) free at local supermarkets, schools, or County Fairs. They are also being provided to representatives of multi-unit residential buildings. The lid is imprinted with the WSSC’s “Can the Grease” logo (shown below), contact information, and instructions.



## 2. Food Service Establishment Marketing

All the applicable FSEs have been under the formal FOG program since 2007 and are reminded of proper FOG management at every inspection. The WSSC also attempts other education about FOG blockages by using the following:

- a. Insertion into FSE’s monthly water and sewer bill.
- b. Distribution by the WSSC field staff crews near sites of blockages.
- c. Partnering with FSE organizations to distribute outreach materials to its members.
- d. Distribution through County Departments of Environmental Protection and the County Health Departments.
- e. Customized multi-location site training (such as public school cafeteria staff, University of Maryland Food Services and the National Harbor site).

The WSSC has interacted with every existing FSE in its jurisdiction since 2007, a total number approaching 11,500 by 2017. For the applicable FSEs required to have a grease abatement system, WSSC FOG Investigator has provided the FSE manager an information package that summarizes the FOG Program and explains the FSEs responsibilities. In addition, the WSSC FOG Investigators will continue to guide and educate FSEs at any routine inspection.