



STATE OF CONNECTICUT
DEPARTMENT OF ENVIRONMENTAL PROTECTION

September 2005

Gina McCarthy, Commissioner

GENERAL PERMIT FOR THE DISCHARGE OF WASTEWATER ASSOCIATED WITH FOOD PREPARATION ESTABLISHMENTS

Introduction

The Department of Environmental Protection (the Department) has issued a “General Permit for the Discharge of Wastewater Associated with Food Preparation Establishments”. This fact sheet summarizes the major requirements of the general permit. Please refer to the DEP website for a copy of the [general permit](#).

Regulated Universe

The general permit regulates the discharge of wastewaters from food preparation establishments that are classified as Class III or Class IV food service establishments, as defined in the CT Public Health Code, and that discharge to a sanitary sewer. This would include, but not be limited to, restaurants, hotel kitchens, hospital kitchens, school kitchens, bars and cafes, factory cafeterias, church kitchens, bakeries and special club kitchens. Food preparation establishments discharging to septic systems are not covered by this general permit.

No Registration Required

The general permit does not require that the Permittee register with the Department. The Permittee will work directly with an authorized agent of the municipality in which the permittee is located to comply, as necessary. The municipal agent may be the Water Pollution Control Authority (WPCA) or its designee or the local building official if there is not a WPCA.

Compliance Timeline

Any new regulated food preparation establishment initiating a discharge after the date of permit issuance shall comply with the permit requirement immediately. All regulated food preparation establishments existing at the date of permit issuance shall comply *no later than July 1, 2011*. However, there are three permit conditions that can trigger earlier compliance for existing food preparation establishments. These include a change in ownership, a renovation of the facility or the municipality designating an area of the sewer system as a problem area.

Requirements of the Permit

Permittees are required to install either a 1,000 gallon (minimum) outside passive grease interceptor or an automatic grease recovery unit (AGRU) in accordance with technical requirements specified in the general permit. The decision as to what technology to install will be made by the permittee. Kitchen fixtures and drains as specified in the general permit shall be connected to the grease interceptor or AGRU. Pollution prevention/best management practices are also required of the permittee including quarterly inspections of the installed equipment and pump-outs of the passive grease interceptor at least every three months. Recovered fats, oils and grease shall be disposed of at a regional collection/transfer/disposal site.

Exemptions

The authorized agent of the municipality may grant a waiver of the requirements for a grease trap/interceptor if, in the judgment of the authorized agent, there is limited potential for FOG in the discharge when considering the frequency of the discharge, the volume of flow and the potential of fats, oils and grease based upon the menu.

Further Guidance

The Department has circulated an electronic copy of a "Guidance Document and Resource Document For the Discharge of Wastewater Associated With Food Preparation Establishments" to all municipal water pollution control authorities in Connecticut municipality with sanitary sewers. With the issuance of the final general permit, the guidance and resource documents will be updated and reissued again to all water pollution control authorities. In addition, the Department will prepare a guidance document for food preparation establishments by the end of 2005 and will conduct educational seminars for permittees and municipal officials. Specific dates will be announced in the future.

Background

The uncontrolled and/or inadequately controlled discharge of fats, oils and grease into municipal sanitary sewage systems has been the cause of significant numbers of raw sewage overflows resulting in both public health risks and negative impacts to Connecticut waterways.

In 1998, the Department initiated an effort to minimize or eliminate sewage overflows caused by fats, oils and grease (FOG) blockages by awarding funding to the City of Torrington to conduct a regional study on this matter. With the assistance of Wright-Pierce and Community Compliance, consultants to the City, and the Torrington Area Health Department, the City concluded several years of study in 2002 with the completion of a report titled "Guidance Document For The Management of Fats, Oil and Grease From Food Preparation Establishments in Connecticut". The report recommended the development of a state-wide general permit to be issued by the Department as the administrative mechanism to control FOG that is discharged to sanitary sewers.

The Commissioner issued a public notice of intent to issue the "General Permit for the Discharge of Wastewater Associated with Food Preparation Establishments" that discharge to sanitary sewers on August 6, 2004 with a thirty day comment period. During the comment period, comments were received including two requests for a public hearing. A public hearing was held on December 1, 2004 at the Department's offices.

Following the public hearing, the Department considered all written and verbal comments received as a result of both public notices, prepared a hearing report and issued the general permit September 30, 2005 with modifications from the public input.

The General Permit was issued to address the following issues:

1. Environmental and health impacts of raw sewage overflows

For the period from January 2002 through June 2004, 258 sewer overflows caused by blockages were reported to the Department. Of these overflows, 70% or 178, were caused by FOG. This results in an average of six FOG overflows per month. Blockages that cause raw sewage overflows into rivers and streams result in environmental impacts, violate water quality standards, and can be a serious health risk to anyone coming in contact with the water. Blockages that result in raw sewage backing up into basements of homes and commercial buildings are a serious public health risk and result in business closures and displacement of homeowners until expensive cleaning and repair are made.

2. Pollution Prevention/Controlling FOG at Its Source

The principle of pollution prevention is that control of a pollutant at its source is a preferred strategy.

3. Impacts on Treatment Plant Operations

Excessive FOG, especially on smaller treatment plants, has created treatment plant upsets in the past resulting in water quality impacts and permit violations. Excessive FOG at larger facilities can cause a lessening of treatment plant efficiency that is detrimental to the environment.

4. Future EPA Regulatory Requirements

Two new rules concerning bypasses are being developed by EPA. Both of these rules will require municipalities to control FOG. A state-wide general permit will provide a useful tool to assist all 130 municipalities with sanitary sewers with compliance with future EPA rules.

5. Municipal Requests for Help

Water pollution control administrators and wastewater operators have requested assistance from the Department to help them address FOG discharges. These local officials see the general permit as a tool that they can use locally to properly control FOG.

For more information, please contact:

Joseph Nestico
Senior Environmental Analyst
Bureau of Water Management
Municipal Facilities Section
CT Department of Environmental Protection
79 Elm Street
Hartford, CT 06106-5127

(860) 424-3755

joseph.nestico@po.state.ct.us

This overview is designed to answer general questions and provide basic information. You should refer to the appropriate statutes and regulations for the specific regulatory language of the different permit programs. This document should not be relied upon to determine whether or not an environmental permit is required. It is your responsibility to obtain and comply with all required permits.