

INSPECTION GUIDELINES

This document provides the basis for inspection of Food Preparation Establishments in Chester. **Guidance is provided on each of the inspection points listed on the inspection report.** This is not intended to be a thorough presentation of activities occurring during an inspection.

General Information (Inspection items 1-4)

1. Registered Pretreatment Equipment – Every Class III and Class IV facility must have registered FOG pretreatment equipment with the **WPCA**.

2. Properly Installed FOG Pretreatment Equipment – Grease pretreatment equipment, includes an outdoor FOG interceptor, an AGRU, or alternate pretreatment equipment. Passive indoor traps are permitted only as alternative FOG pretreatment equipment when an outside grease trap is in use. Kitchen sewer lines are to be separate from sanitary sewer lines. If a facility is thought to have connections between the kitchen and sanitary sewer, dye tablets may be used to confirm a cross connection. Inspectors should confirm that FOG interceptors are installed in the proper orientation. It is not uncommon for outdoor and indoor FOG interceptors to be installed backwards (kitchen drain connected to the trap outlet and the trap inlet connected to the municipal sewer). Improper installation allows FOG to be released to the sewer system and reduces the capacity of the unit.

The following kitchen fixtures **must** be connected to FOG pretreatment equipment:

- Pot sink;
- Pre-rinse sink or dishwashers without pre-rinse sinks;
- Any other sinks into which FOG may be introduced;
- Tilt kettles or tilt braising pans;
- Floor drains or sinks into which kettles may be drained;
- Work station drains;
- Automatic hood wash units;
- Dishwashers without pre-rinse sinks; and
- Any other fixtures or drains that can allow fats, oils and grease to be discharged into the sewer.

3. Was outdoor FOG Interceptor Inspected? – It may not be practical to open outdoor FOG interceptors on every visit to a facility. This item is included on the inspection checklist to allow tracking of the date of the last inspection of the inside of the FOG interceptor.

4. Was FOG Interceptor Accessible for Maintenance? – All FOG management equipment must be accessible for maintenance. Outdoor traps must not have dumpsters, tables or other fixtures or equipment located above them. Indoor FOG management equipment must not have items stacked on them or have shelves or other kitchen fixtures placed in locations that would prevent access for maintenance. Indoor traps should be installed at an elevation that allows access. Common inconvenient locations include behind piping, suspended just below the ceiling in basements, and under sinks that provide insufficient clearance to remove the lid. Installation in these inconvenient locations should be avoided to allow routine maintenance.

Major Violations Outdoor FOG Interceptors (Inspection items 5-8)

Food Preparation Establishments (FPEs) are required by the Municipal Sewer Use Ordinance to admit properly identified FOG inspectors into their facilities. FPEs are further required to provide the labor to open FOG pretreatment equipment. FPEs will not typically open outdoor FOG interceptors themselves but rely on the Grease Trap/Interceptor Cleaner to open, clean and inspect these units for them. Inspections should be conducted during normal work hours and preferably not during peak business hours. Observation during peak hours can provide insight into normal operations; however, interference with FPE operations should be kept to a minimum.

5. Does pumping frequency meet permit – The maintenance log should be reviewed to ensure that maintenance is occurring once every quarter for outdoor FOG interceptors. If grease accumulation is greater than ¼ of the interceptor depth (typically 9 inches) at the time of inspection, pumping should be scheduled as soon as possible, and thereafter at a more frequent interval.

6. Are baffles in good condition – The baffle should extend a minimum of three inches above the water level. If the baffle is submerged this may indicate that the passage through the baffle is plugged.

7. Are inlet and outlet Tees in place – Inlet and outlet tees must be in place and located below the manholes to allow for observation. No liquid should be flowing over the top of either the inlet or outlet tee. Caps should not be placed on the tees. No visible fats, oils, or grease should be observed leaving the FOG interceptor at the outlet tee.

8. Is grease less than one quarter the depth of unit - The requirement for pumping grease interceptors is a maximum depth of one quarter of the liquid depth of FOG and settled solids. However, it may not always be possible to determine the liquid depth of the FOG interceptor. In these cases, the volume of the interceptor should be reviewed either from permit records or from the maintenance log to determine the allowed depth of solid material in the grease interceptor. Allowable FOG accumulation in most 1,000-gallon grease interceptors is 9 inches. During inspection, the thickness of the grease layer seen should be consistent with the time since the last cleaning of the tank. (i.e., if the tank was pumped a few days prior to the inspection, the grease layer should be visible only as a thin layer or film at the top of the water layer.) The walls of the tank should be in good condition.

Major violations indoor FOG interceptor (Inspection items 9-14)

Both passive and active indoor traps must be properly vented to work properly. This is most easily noticed by an unusually low water level within the unit. When these units are not vented properly, a siphon action can lower the operating level below the desired level. Usually the vent is located within a few feet of the unit.

9. Is unit maintained – Indoor passive traps must be cleaned every day that the facility is operating. Poor accessibility or lack of equipment to clean the trap will decrease the likelihood of proper maintenance. Inspectors should review the maintenance log and inquire with the individual cleaning the FOG interceptor where the material removed is discarded. FPEs may be asked about methods for cleaning indoor passive traps. AGRUs must be emptied as required and maintained and inspected weekly.

10. Is automatic unit energized – All AGRUs are to be energized at all times. AGRUs are typically pre-wired to be plugged into a wall outlet. The Connecticut *General Permit* requires units to be hardwired to the electricity to prevent accidental unplugging of the units.

11. Are screening basket and baffles in place – The screening basket for catching food particles and flow diversion baffles should be installed in their correct position. If these items are not installed they should be located and reinstalled. If these items are missing or broken, replacement parts must be ordered.

12. Is skimmer or pump in working order – The skimmer on some AGRUs consists of the motor that turns the skimmer wheel, the skimmer wheel, and the wiper blades. All of these items must be in working order. The outlet where FOG is discharged into the collection container should be checked to ensure it is not clogged. Those AGRUs that use sensors to detect the volume of FOG in the separation chamber typically use either a pump or a valve and gravity to remove FOG from the unit. The pump or valve should be checked for proper operation.

13. Is heater element in working order – On some ARGUs, there is a heater element which requires 5 to 10 minutes to heat the unit contents. It may be most efficient in facilities where these AGRUs are installed to turn the heating element on at the beginning of the inspection then return to the AGRU later. This will allow the heating element to warm up. Note that some units have two timers, one for the heating element and a second for the skimmer wheel. The heating element should energize at least 30 minutes prior to the skimmer energizing so that the FOG accumulated in the unit will have sufficient time to liquefy.

14. Is grease collection container in place – The FOG collection container should be in the correct position to receive FOG from the AGRU and easily accessible for cleaning. Disposal to a floor drain is not allowed. The inspector should inquire where the collected grease is discarded. Disposal locations should be at facilities designated for AGRU grease collection or with a Grease Trap/Interceptor Cleaner. Renderers typically do not pick up this material as it has been contaminated by detergents and wastewater. However, conditions for acceptance vary with different renderers.

Minor Violations (Inspection Items 15-21)

15. Is FOG interceptor maintenance log available – All FPEs are required to maintain a log of maintenance activities for each FOG interceptor and each AGRU. When more than one FOG pretreatment unit is installed at a facility, each pretreatment unit should have its own maintenance log, clearly marked to indicate which unit's information it holds. The maintenance log should include the name of the person cleaning the unit, the date, the condition of the components, and volume of material removed at each cleaning. These maintenance logs should be posted close to the FOG pretreatment unit.

16. Are signs posted at all sinks – Signs are to be posted on sinks indicating the activities that are allowed at each sink. Signs are a good method of instructing new employees on proper procedures, particularly when employee turnover is high.

17. Are pots, pans, dishes and utensils scraped – Grease that can be rendered should be poured into a renderable FOG container. All other food particles, grease, and other material is to be scraped into a trash container. Garbage grinders must not be installed and all pre-rinse sinks should have screens to catch food particles.

18. Is there adequate renderable FOG storage – The renderable grease container and non-renderable grease container, if applicable, should be covered to ensure they are protected from spills or overflow during rain events. Grease collection containers should be placed to avoid grease entering floor drains or storm drains. The preferred location for rendering containers is in a walk-in freezer, if possible, to reduce the exposure to rodents, flies, and other nuisance conditions. However, many facilities have no choice but to place rendering containers outside.

19. Is renderable grease recycled – Inspectors should note facilities that use large volumes of grease. Facilities that use a fryolator should use a rendering service. This material should not be discarded in the trash as large volumes of grease can attract rodents, flies, cause odors and possibly cause problems in municipal waste incinerators as well as other nuisance conditions.

20. Is exhaust hood properly cleaned – Inspectors should inquire where and how often exhaust hood filters are cleaned. Some facilities have contractors who clean these filters off-site. Exhaust hood filters are to be cleaned in a sink that is connected to FOG Pretreatment Equipment.

21. Non-renderable FOG disposal location – Grease removed from a passive or automatic FOG interceptor is non-renderable (having been contaminated by exposure to other toxic materials) and according to DEP's General permit must be disposed of through a licensed hauler or facility. In some instances this could be the same as the rendering service.

22-23. Grease trap/interceptor cleaner's information - The name of the non-recyclable grease trap/interceptor cleaner or rendering company should be recorded to allow tracking of the FOG from its source to disposal.