1. What is FOG (Fats, Oils, and Grease)?

FOG includes animal fat, cooking oils and food related grease used or generated by food preparation.

2. Why does the CWPCA (Cromwell Water Pollution Control Authority) have a FOG Program?

The CWPCA developed the FOG Program in response to the Connecticut Department of Environmental Protection's (CT DEP) *General Permit for the Discharge of Wastewater Associated with Food Preparation Establishments,* which is a Statewide mandate. The program is designed to minimize the discharge of animal fat, cooking oil, and food related grease into the sewage collection system. FOG accumulates in the sewage collection system causing blockages and the sewage to backup or overflow the system causing a health hazard.

3. Who is required to register with the CWPCA for discharge of grease?

Establishments that serve food or prepare food by methods that use or generate fats, oils, or grease are required to register. This includes those facilities classified by the State Health Department as Class III or Class IV Food Service Establishment. It also includes facilities that serve or prepare food that are regulated by the Department of Consumer Protection. Class I and II Food Service Establishments, residents, and industrial sewage discharges are not regulated by this program.

4. Am I still required to register if my facility does not generate FOG?

Facilities that believe that they do not meet the criteria for this program, because they do not cook in a manner that uses or generates fats, oils, or grease and do not serve meat, may file a request for variance *with* their application. Variances are subject to the approval of the CWPCA.

5. How long is my FOG Discharge Permit valid?

Discharge permits are valid for a one-year period from January 1 through December 31. Permit renewals must be filed each year by November 30. Late fees shall be levied starting December 1.

6. What are the Permit requirements?

Facilities are required to have a properly sized outdoor grease trap or indoor automatic grease recovery unit (AGRU) installed and properly maintained. Indoor passive grease traps are no longer an acceptable means of grease removal. Documentation of proper maintenance activities is required. Documentation includes recording of grease trap cleaning and maintenance activities in a logbook. Example log sheets are available from the Office of the Cromwell Sewer Administrator.

7. What happens if my establishment is found to be in violation of the Permit?

Unscheduled inspections are conducted by the Town Health Inspector to verify proper cleaning and maintenance of grease traps, proper storage of grease, and good grease handling practices. Violation notices are provided in writing. Re-inspections are scheduled 30 to 45 days after notification. Conditions that have not been corrected by the second inspection will be subject to re-inspection fees of \$100 per re-inspection. Continuing violations may be subject to prosecution as described in the Cromwell's Sewer Use Ordinance Article V.

8. What is the difference in renderable and non-renderable FOG?

The CT DEP's *General Permit* makes the distinction between renderable and non-renderable grease based on contact with wastewater.

Renderable FOG is any FOG that is collected directly from the cooking process. This material should be collected by a company that will render this material so that it may be used to manufacture other consumable products such as pet food, cosmetics, soaps and similar products.

Any FOG that has been removed from water is considered non-renderable.

9. How often are grease traps inspected?

The inspection frequency depends on the classification of the Food Preparation Establishment. As the Health Department conducts the inspection of grease traps, Class III facilities will be inspected up to three times per year and Class IV facilities will be inspected up to four times per year. All inspections are unscheduled. Facilities found to be in violation of Cromwell's FOG Program will be subject to a re-inspection 30 to 45 days after notification that they are in violation.

10. What are the fees for the FOG Program?

An initial application fee will be charged starting on November 30, 2010. Facilities who have filed an initial application prior to that date will be exempt from the initial application fee. There is also an annual permit fee. Facilities are required to file for permit renewal by November 30 each year. Fees shall not be prorated or refunded. Fines for violating the terms of the discharge permit may apply.

Fee Schedule

Standard Fees	
Annual Application and Variance Fee	\$100
Late Fee	\$25 per month
Violation Fees	
Third and Additional	\$100
Re-inspection Fee	
Administrative Order Fee	\$1,000