

March 28, 2023  
9:15 – 10:00 AM

SESSION III Collection O&M – Grease, Heavy is the Crown

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## Grease Trap Inspections in Princeton

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March 28, 2023

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### Issues and Drivers

- We spend 6-12 hours a week cleaning portions of sewer prone to grease buildup (\$73K/year)
- In the last year we have had two (2) sanitary sewer overflows (SSO) related to grease buildup
- We spent approximately \$5,000.00 last year on various grease control products (i.e. lift station degreaser, jet degreaser, bio blocks, etc.)
- We spend an additional 8 hours a week deploying grease buildup control measures at our various lift stations (\$58k/year)

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### Why the Sewer Department?

- Construction Department determines the need for and size of grease traps but has no authority after the PO is issued.
- Health Department would be concerned with interior backups but has no authority after the grease leaves the premise.
- Sewer Department has vested interest in ensuring grease traps work properly and don't bypass grease into the public sewer. Even without public health emergencies, we care about the costs associated with poor grease management.



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### Old Program

- Performed 1-2 log-only inspections per year to limit disruption of business.
- Inspections were announced, so businesses were able to "update" logs before inspection.
- Only performed open-trap inspections if an issue was already identified.
- Used scoop to check for debris buildup and tap against side walls and baffles.
  - Unable to tell if traps were properly cleaned.
  - Unable to tell if traps needed repairs.
- Enforcement was conducted by Health Department instead of Sewer Department.
- No education regarding proper cleaning or best management practices.
- Inspection tracked on paper. Poor records, lists outdated.

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### Old Ordinance

- (a) Grease Interceptors Required. Grease interceptors shall be provided by the owner, landlord and/or tenant of all existing and new retail food establishments, delicatessens, restaurants, take-out food establishments, hotel kitchens, bars, factory cafeterias, clubs or other eating establishments, to prevent excessive quantities of grease to be discharged into the sanitary sewer system.
- (1) Inspection and Review of Existing Establishments. The PSOC shall inspect all existing establishments as described in this section and, where necessary, require installation of grease interceptors as provided for in this article. Any person or establishment who shall fail to comply with any notice requiring such installation issued by the sanitary engineer within 45 days after said notice, shall be liable for a fine of not less than \$100 and an additional fine of not less than \$25 for each day of delay after expiration of such 45 days in which the provisions of such notice are not complied with.
- (2) New Construction. All building plans for retail food establishments, delicatessens, restaurants, take-out food establishments, hotel kitchens, bars, factory cafeterias, clubs or other eating establishments, must be reviewed for grease interceptor requirements and approved by the sanitary engineer prior to the issuance of a building permit.
- (b) Sizing and Installation of Grease Interceptors. Grease interceptors shall be installed in accordance with the applicable provisions of the Uniform Construction Code Act. Notwithstanding the provisions of the Uniform Construction Code Act, each compartment of a three compartment sink in a food establishment shall be connected to a grease interceptor.
- (c) Maintenance of Grease Interceptors. Interceptors shall be maintained in efficient operating condition by periodic removal of accumulated grease, scum, oil or other floating substances and solids deposited in the interceptor. Cleaning intervals shall be frequent enough such that grease does not bypass the interceptor. Intervals shall be dependent on the capacity of the interceptor and quantity of grease in the wastewater, but shall be a minimum of once every month. A log of the cleaning operations shall be posted in such a manner that it can be inspected by the sanitary engineer, his representative or health department personnel. The log shall include the date of cleaning, description of the volume removed, identification of approved disposal site and the signature of the person responsible for its cleaning. Upon request of the inspector, the trap shall be opened by a representative of the establishment to provide for a physical inspection. Any person or establishment who shall fail to adequately clean grease interceptors at necessary intervals, provide for an up-to-date cleaning log, or refuse to open the grease trap for physical inspection shall be liable for a fine of not less than \$50 for each occurrence.

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## Issues with the Old Ordinance

- Limited to a \$50 fine for non-compliance
- Poor language made it difficult to show non-compliance
- Enforcement was often shifted to the Health Department to seek compliance
- No provisions to require repair or replacement of broken/deteriorated traps
- No requirements to follow BMPs (dry wipe, drain screens, no solvents, no hot water, etc.)
- No accountability for known offenders (grease in laterals)

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## New Ordinance

- Grease traps shall be provided by the owner, landlord and/or tenant of all existing and new retail food establishments, delicatessens, restaurants, take-out food establishments, hotel kitchens, bars, factory cafeterias, clubs or other eating establishments (collectively referred to in this section as "establishments"), to prevent the discharge of FOG into the sanitary sewer system.
- Appropriately sized grease traps shall be installed in accordance with the applicable provisions of the UCC. Notwithstanding the provisions of the UCC, the wash and rinse compartments of a three-compartment sink in a food establishment shall be connected to a grease trap. If, due to a change of use or expansion of facilities, an existing grease trap is undersized, the trap must be replaced with an appropriately sized unit.
- Establishments shall adhere to best management practices dealing with FOG disposal. Each establishment is responsible for ensuring their employees' adherence as well. Best management practices include, but are not limited to, the following:
  - Scraping or dry-wiping FOG and food from pots, pans, utensils and dishware before washing.
  - Using drain screens, as appropriate, to reduce the amount of FOG and other solids entering the grease trap.
  - Disposing of food waste in the garbage or compost, or by other permitted means which do not include disposal in the sanitary sewer system.
  - Ensuring that water hotter than 140° F. does not enter the grease trap.
  - Ensuring that any surfactant, solvent, or emulsifier does not enter the grease trap.
- Maintenance of grease traps.
  - The walls, baffles, gaskets, and other appurtenances of a grease trap shall be in good working condition. Any grease trap or part thereof that has deteriorated due to corrosion, mechanical distress, or any other cause shall be repaired or replaced if the condition negatively impacts the function of the grease trap as determined by the sewer engineer. Repairs shall be conducted within 30 days of notice from the sewer engineer that said grease trap is one or more parts thereof are defective.
  - Grease traps shall be cleaned as frequently as necessary to ensure the unit is working effectively. As a minimum, grease traps shall be cleaned after 75% of the design storage capacity is reached or once every three months, whichever is more frequent. Grease traps shall be cleaned by fully evacuating the trap of all FOG and other liquids and solids. Side walls and baffles will be scraped as necessary to remove accumulated solids. FOG shall be disposed of in accordance with applicable local, state, and federal laws and regulations. Care must be taken during cleaning to prevent any FOG from entering the sanitary sewer system. After cleaning, the trap shall be filled with fresh cool water prior to operation. Hot water and enzymatic cleaners shall not be used in the trap as they may cause FOG to bypass the trap and enter the sanitary sewer system.
- Inspections.
  - The sewer engineer or the engineer's designee shall perform grease trap inspections as often as the engineer or designee deem appropriate, but at least once annually. Upon the request of the sewer engineer or designee, a representative of the establishment must open the grease trap and make accessible the trap and any areas of the facility which may handle FOG.
  - The establishment shall use a cleaning log to document when a grease trap is cleaned, who the grease trap was cleaned by, and the volume of solids removed. At a minimum, the establishment shall maintain records for the preceding twelve-month period. If a third-party company is contracted to clean the grease traps, receipts or other proof of service must be kept with the cleaning log. The cleaning log and all applicable receipts must be submitted to the sewer engineer or designee upon request.
  - The sewer engineer or designee may, from time to time, conduct video inspections of sewer mains and sewer laterals. If excess accumulation of FOG is observed in the lateral servicing an establishment, that establishment shall be in violation of this section.

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## New Ordinance, Simplified

- Grease traps are required at all commercial food establishments.
- The wash and rinse compartments of a three-compartment sink must be connected to a grease trap.
- If an existing grease trap is undersized, the trap must be replaced.
- Establishments follow best management practices, including:
  - Scraping or dry-wiping dishware before washing, using drain screens, disposing of food waste in the garbage or compost, not using water hotter than 140° F., not using any surfactant, solvent, or emulsifier.
- Grease traps must be in good condition. Repairs must be made in 30 days.
- Grease traps must be cleaned when 75% full or once every three months, whichever is more frequent.
  - All liquids and solids must be removed.
  - Walls and baffles must be scrapped clean.
  - Hot water and enzymatic cleaners are prohibited.
- Princeton will inspect grease traps at least once a year, or more often as needed.
- The establishment must open the grease trap during inspections.
- Cleaning logs are required and must be provided upon request.
- If FOG is observed in the lateral, the establishment is in violation.

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## Scheduling Inspections

- Mailed notification letters to businesses in Q4 2022
- New program requirements "live" January 2023
- Inspection must be scheduled during or immediately after cleaning
- Inspection scheduled online @ [www.princetonnj.gov/greasetrap](http://www.princetonnj.gov/greasetrap)
- Schedule at least 1 week ahead
- 1-2 additional annual unannounced log-only inspection



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## Using Field Maps to Support Inspections



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## Survey123 Inspection Form

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## Survey123 Inspection Form

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