

Lompoc City Council Meeting

Tuesday, August 3, 2021



**Approval of Proposed Amendments to
Sewer Use Ordinance and
Proposed Fats, Oils, and Grease Control
Program Policy, in Response to U.S. EPA's
Administrative Order on Consent**

City – EPA AOC Requirements

- Paragraph 36 Summary of Pretreatment Program updates, including sewer use ordinance (SUO) amendments, approved by EPA on June 24, 2021
- Paragraph 37 Proposed amendments to SUO, due August 23, 2021
- Paragraph 39 Proposed Fats, Oils, and Grease (FOG) Program, due August 23, 2021

SUO Major Changes

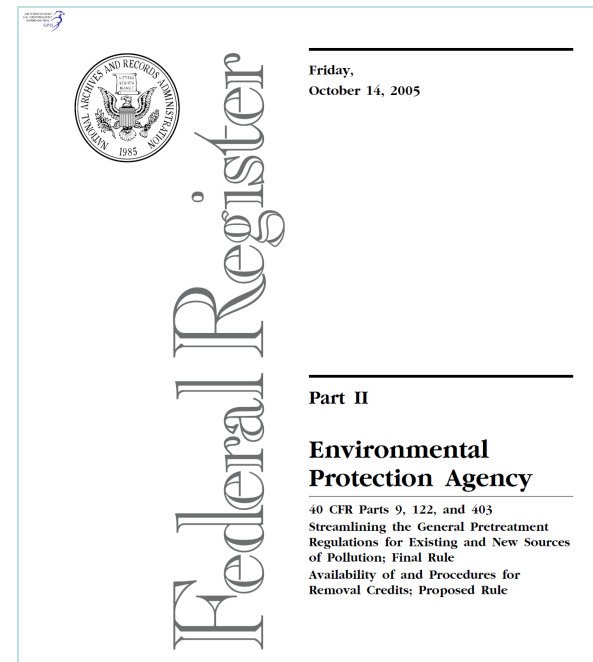
- AOC requirements in Paragraph 33
 - **Definitions**
 - Specific prohibitions
 - Industrial user (IU) permit requirements
 - IU monitoring and reporting requirements
 - Enforcement Response Plan
 - FOG Program
- Pretreatment Compliance Inspection/Audit findings
- Pretreatment Streamlining Rule (2005) required provisions
- General update

Enforcement
Response Plan

City of Lompoc, California
October 27, 2020

SUO Changes

- Pretreatment Streamlining Rule (2005) optional provisions
 - General permits
 - Best management practices (BMPs)
 - Monitoring waivers
- General update
 - Administrative fines
 - Extra-jurisdictional areas
 - Surcharge program
 - Water softeners



FOG Program – Legal Authority

LMC 13.16 Article 9: Fats, Oils, and Grease Control Program

- LMC 13.16.520 – 13.16.610
- Grease control device requirements for food service establishments (FSEs)
 - Establish de minimis threshold
- Implementation of BMPs
- Monitoring and reporting conditions
- Sampling and inspection conditions
- Enforcement

FOG Program Policy

- Discharge prohibitions and pretreatment requirements
- Guidelines for appropriate grease control devices
- Device operation and maintenance requirements
- FSE procedures/requirements for:
 - Monitoring and reporting
 - Inspection and sampling
 - Recordkeeping
- City oversight procedures/goals, including enforcement
- Outreach efforts
- Program staffing