

DPH's R. Scully's cursory review comments on DEEP's 3-26-15 Draft General Permit (GP) for the Discharge of Wastewater Associated w/ Food Preparation Establishments:

- The previously defined term Automatic Grease Recovery Unit (AGRU) is being deleted. The AGRU term is referenced in Section V (Subsection C) of DPH's 1/1/15 Technical Standards. New term, Grease Recovery Unit (GRU) is defined and it includes both automatic and manual units that are designed to meet specified effluent limits, and the associated Fact Sheet notes that these definition changes are meant to expand the use of other equipment beyond skimming devices. The Environmental Engineering (EE) Program's historical experience w/ interior passive grease removal units is that they are not as effective in grease removal as mechanical units, and typically they are not cleaned as required. Is DEEP planning on generating/maintaining a list of GRUs that satisfactorily demonstrated they can meet the specified effluent limits? It is recommended that the AGRU definition be maintained in the GP.
- New definition: Grease trap/FOG interceptor. Fact sheet says it's an outdoor tank, whereas draft GP says an indoor or outdoor tank. These tanks in vehicular wheel loading applications should be designed for H-20 wheel loadings. It is noted that the inlet pipe invert shall be between 3" and 6" above the outlet pipe invert. It is recommended that 2" to 4" be cited, which would be consistent w/ DPH's Technical Standards and the ASTM specification C 1613 for precast concrete grease interceptor tanks. These tanks are precast w/ a 3" differential, and must be installed so that the differential is between 2' and 4". The tank seams are noted to be sealed w/ non-shrinking cement or similar material. The above noted ASTM specification stipulates flexible sealants meeting ASTM C 990 are to be used, and rigid (mortar) sealing of tank sections are not permitted. It doesn't appear that pipe-to-tank connections are specified. It is recommended that flexible connections be required, and reference to the ASTM standards (C 1644 or C 923) for watertight tank seals per DPH's Technical Standards be specified for compliant pipe-to-tank connections.
- FOG management equipment cleaner is a defined term. It is recommended that the word "regularly" be removed from the definition. FOG management equipment is a defined term and it includes GRUs, grease traps/FOG interceptor, and other equipment. It is not clear what other equipment would include.
- The inlet and outlet piping for grease traps/FOG interceptors are noted to require joints that are sealed w/ rubber compression gaskets or solvent weld couplings, and the joint must meet ASTM D 3212 specification. This specifications is for joints for drain and sewer plastic pipes using flexible elastomeric seals (a.k.a., rubber compression gaskets) that are non-pressurized or limited pressure (<25 ft. TDH). ASTM D 3139 is a similar gasket specification, but for plastic pressure pipe, which is what the specified Schedule 40, ASTM D 1785 pipe is. It is recommended that Schedule 40, PVC ASTM D 2665 pipe also be allowed as it is essentially the same pipe with the only difference that one includes leachate testing requirements as it is for potable water applications. Many pipes are dual marked w/ both specifications. In order to avoid clogging & freezing issues it is recommended that a minimum pitch of 1/4" per foot for 4" pipe and 1/8" per foot for 6" building sewer pipe be specified, and a cleanout to grade should be provided if the building sewer is >75'.
- The Grease Trap/FOG interceptor includes a vacuum test procedure that cites a vacuum of 4 inches (50 mm). The 50 mm should be 100 mm, and it is recommended that the updated leakage test language that is cited in DPH's Technical Standards be utilized, as it better aligned w/ the updated procedures in the ASTM standards for septic tanks and grease interceptors.
- Inquire if liquid food composters (ref. 12/8/11 Y. Bolton letter) would cause issues w/ the GP.
- The GP notes that grease traps/FOG interceptor tanks should maintain minimum separation distance to buildings, water bodies, drains, per local ordinances. Inquire if there are any template ordinances that include suggested minimum separation distances, or any other state issued guidance on siting of these tanks. There should also be sufficient separation to catch basins.