

Small Group Meeting Summary: Building Officials Association of British Columbia Executive

Food Sector Grease Interceptor Bylaw Review

Meeting Date: March 6, 2019

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1. Background

Metro Vancouver, in an effort to reduce the amount of fats, oils and grease entering the sewer system, is engaging food sector establishments and related stakeholders to obtain feedback on a review of the Food Sector Grease Interceptor Bylaw (the bylaw).

Specific areas of interest and exploration included:

- Effectiveness of the current bylaw
- Challenges associated with meeting bylaw requirements
- Educational initiatives that might improve awareness, understanding and compliance with the bylaw

Metro Vancouver recognizes that changes to the Food Sector Grease Interceptor Bylaw (the bylaw) could have an impact on stakeholders and is committed to delivering a responsive, transparent stakeholder engagement program. A variety of forums are being used to learn about stakeholder issues and interests related to the bylaw. Information collected during the engagement period will inform the bylaw review. Results and recommendations will be reported back to stakeholders and the Utilities Committee and Greater Vancouver Sewerage & Drainage District (GVS&DD) Board at the end of the process.

Small Group Meetings are being hosted to support a discussion of factors inhibiting compliance and the special considerations of stakeholder groups with unique interests or characteristics.

2. Notification

In August 2018, Metro Vancouver issued invitations to engage in the bylaw review, by email and post, to over 10,000 Food Sector Establishments and other stakeholders within Metro Vancouver. Invited stakeholders responded to Metro Vancouver by email to confirm their interest. Those confirming their interest and availability were assigned to the appropriate stakeholder meeting.

3. Small Group Meeting

Building Officials Association of British Columbia (BOABC) Executive

Date & Location

Wednesday, March 6, 2019 1:30 p.m. – 3:00 p.m.

Metro Vancouver – 15th Floor Meeting Room (1573)
Metrotower Office Complex
4730 Kingsway
Burnaby

Participants

NAME	ORGANIZATION
Belinda Moen	Director, Lower Mainland Zone, City of Abbotsford, Building Officials Association of British Columbia
Jacek Redlinkski	Director, Lower Mainland Zone, City of Richmond, Building Officials Association of British Columbia
Grant McKechnie	Plumbing Inspector, City of Abbotsford

Presenters & Support

NAME	ORGANIZATION
Tom Sadleir	Program Manager, Public Involvement, Liquid Waste Services, Metro Vancouver
Linda Parkinson	Program Manager, Source Control, Liquid Waste Services, Metro Vancouver
Marlene Fuhrmann	Permitting Specialist, Environmental Regulation and Enforcement, Metro Vancouver
Xenia Dandridge	Communications & Education Coordinator, Public Involvement, Liquid Waste Services, Metro Vancouver (Recorder)

4. Presentation

Metro Vancouver presented the following to provide context for the bylaw review:

Engagement Process – Tom Sadleir

- Purpose of the bylaw review
- Engagement objectives
- Timeline

Background – Linda Parkinson

- Metro Vancouver management of the region's wastewater
- Metro Vancouver's Source Control Program
- Effects of fats, oils and grease on infrastructure
- Description of current bylaw

Bylaw Enforcement – Marlene Fuhrmann

- Working with municipalities to identify “hot spots”
- Inspections to date
- Common violations
- Fees

5. Feedback

A series of discussion topics were used to obtain feedback on the bylaw review. The following lays out the comments and questions that were raised at the meeting.

Topic 1

How do you (your members) enforce the bylaw?

- There is no mention of digesters in the BC Plumbing Code, therefore we do not accept them in Abbotsford.
- What happens if food sector establishments do not comply with the bylaw? Can Metro Vancouver issue fines?
- In Richmond, the Plumbing Department conducts ‘non-permitted’ inspections when there are compliance issues.
- In Richmond, we look to Metro Vancouver for grease interceptor sizing requirements regardless of whether it is a small or large tenant improvement. We expect engineers to know that they must refer to Metro Vancouver so we tend to get less involved when there are engineering drawings. There are situations where Metro Vancouver and the BC Plumbing Code are inconsistent. In those situations, we tell people to follow whichever rules are stricter.
- In Abbotsford, we require all grease interceptors to be sized by an engineer. Before the changes to the BC Plumbing Code in 2018, we followed Metro Vancouver’s sizing rules but now we must follow the Canadian Standards Association (CSA).
- In my experience, most engineers are using the Metro Vancouver bylaw to size grease interceptors.
- In Abbotsford, we check sizing, even with engineered drawings. We don’t allow plumbers to size grease interceptors.
- The BC Plumbing Code does not specify if an engineer or a plumber must create the installation plan – the decision is with the client (e.g. developer / owner).
- Inspectors receive a copy of the letter that is issued from Metro Vancouver to ensure that what has been installed in a food sector establishment, including the fixtures, matches what is in the approved plan. Often, engineers will not submit the drawings to our municipality until they have received the ‘plan will comply’ letter from Metro Vancouver.
- There are issues with the BC Plumbing Code. For example, a prep sink that might have solids in it cannot go through a grease interceptor by code. Typically, these fixtures are eliminated from the grease interceptor. We rely on Metro Vancouver to provide clarity.

- A plumbing permit is required to get a building permit. A building permit is required to get a get business license. The business license inspector will notify us if what has been installed is different than the approved installation plan.

Topic 2

What do you consider to be the implications of recent changes to the Plumbing Code (2018) to refer to Canadian Standards Association (CSA) B481.0 and B481.3?

(Note: Two comparison tables were provided as reference material for the participants. Table 1 included language pulled directly from the Metro Vancouver Food Sector Grease Interceptor Bylaw, CSA B481 Series-12, and BC Plumbing Code for comparison. Table 2 included summaries regarding various aspects of the Metro Vancouver Food Sector Grease Interceptor Bylaw and CSA B481 Series-1, as well as differences to note between the two standards.)

Fixtures Connected and Fixtures Not Connected:

- There are 'Notes' sections in the CSA B481 Series-12 and BC Plumbing Code that are for information purposes only. These notes are not considered legally binding.
- The codes do not cover maintenance.
- Requirements for dishwasher connections vary significantly between standards. In Abbotsford and Richmond, we treat each scenario on a case by case basis.
- There are times when it is easier and cheaper for a food sector establishment to install a dedicated grease interceptor.
- We allow more than one grease interceptor as long as it meets the bylaw and the BC Plumbing Code. We do not reject people for not having a dedicated grease interceptor. The changes to the BC Plumbing Code came into effect in December 2018 so we are still checking plans that were submitted before the changes came into effect.
- There was a time when dishwashers were not allowed to connect to grease interceptors. I heard at a conference four or five years ago that down at the molecular level, hot water and detergent do not affect grease interceptors.
- Why doesn't Metro Vancouver work with the Building Safety and Standards Branch to align the BC Plumbing Code to the bylaw? Metro Vancouver could reference the BC Plumbing Code instead of having this information in the bylaw.

Sizing:

- When plumbers come back from the field they say everything is so oversized because of the sizing methodology.
- The sizing methods for the bylaw and CSA come up with different sizes.
- The discharge volume has to go through an inch and a half pipe. 100% of the volume does not go through the grease interceptor at the same time.
- The size of the grease interceptor and type of food sector establishment should determine the frequency of maintenance.

- If we see a sink that has been altered and not approved, then it must be removed. This only happens if we (the municipality) see it.

Location:

- In Richmond, we used to ask that all grease interceptors be located outside the kitchen. Then a contractor informed me that they did not need to be outside.

Maintenance:

- Most municipalities do not have maintenance bylaws. CSA says municipalities are supposed to look at the frequency of maintenance but we do not have a maintenance bylaw.
- Are food sector establishments required to submit maintenance records to Metro Vancouver?
- How does Metro Vancouver regulate food trucks that don't have a commissary kitchen? Many food trucks operate out of their houses with no grease interceptor.
- What about residential towers where there is a lot of grease? It would be possible to have designated kitchen stacks connect to a grease interceptor if all kitchens were located directly under each other with dedicated piping separate from bathrooms etc.
- Requiring food sector establishments to submit maintenance records as part of annual business license reviews would be difficult because annual renewals are automatic.

Topic 3

What concerns do you have with the respect to the Metro Vancouver Bylaw?

How could Metro Vancouver change the bylaw to make it easier for you (your members)?

- The Metro Vancouver bylaw is clear to us.
- Sizing requirements are a concern. Metro Vancouver's sizing requirements are different than the CSA. This creates an issue for engineers, however, we always require sizing to follow whichever regulation is stricter.
- There is one more step to a business license, which is the health approval. This is our last check to ensure everything has been installed correctly.
- Better public awareness of the bylaw would be helpful. Often small food sector establishments hire engineers from jurisdictions that aren't aware of local requirements. Engineering drawings could be produced outside of the province or outside of Canada. Most large engineering firms are knowledgeable about our requirements but smaller firms that are doing small tenant improvements for ethnic restaurants may not know how to size a grease interceptor. Smaller food sector establishments struggle with the cost of hiring an engineer for upgrades.

Topic 4

How would you like to be engaged?

- All Building Officials, including Plumbing Officials, are BOABC members. Any information sent through BOABC will reach these people.
- Plumbers have a monthly Lower Mainland Plumbing Code Committee meeting.
- The BOABC three-day conference has a high rate of participation. The next conference will be held May 27 – 31, 2019 in Vancouver. Metro Vancouver could get in touch with the BOABC CEO, David Schioler, if anyone is interested in setting up a booth or being a presenter.

6. Next Steps

Metro Vancouver will analyze all questions and comments from the small group meetings and identify key themes to inform the development of discussion topics for the Working Group, which will meet 5-6 times in 2019. Metro Vancouver will recruit Working Group members from the varied stakeholder groups that participated in the Small Group Meetings. The Working Group will be guided by a Terms of Reference.

