

Food Sector Grease Interceptor Bylaw Review:

Working Group Meeting

Reviewed and Approved for Issuance: November 28, 2019

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Date & Location

Tuesday, October 22, 1:30 p.m. – 4:00 p.m.
Metro Vancouver – 28th Floor Conference Centre
Metrotower Office Complex
4730 Kingsway
Burnaby

Participants

<p>Christopher Fletcher, Walker Environmental Dustin Fowler, Boston Pizza Ken Purdie, Boston Pizza Jared Girman, West Coast Reduction Angela Hazelton, Beatniks Bistro Tom Sadleir, Program Manager, Community Engagement, LWS, Metro Vancouver Linda Parkinson, Program Manager, Source Control, LWS, Metro Vancouver Marlene Fuhrmann, Permitting Specialist, Environmental Regulation and Enforcement, Metro Vancouver Nicole Montgomery, Assistant Manager, Environmental Protection, City of Vancouver</p>	<p>Facilitators Kirsty Dick, Manager Creative Services, Lucent Quay Consulting Galen Aker, Communications Coordinator, Lucent Quay Consulting</p> <p>Regrets Joy Roque, White Spot Ian Tostenson, BCRFA Maia Penco, Prism Engineering Charles Powell, Fluid Mechanical David Chung, Jade Seafood Restaurant Simon Cotton, The Reef</p>
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Meeting Summary

Agenda Item
Welcome, Introductions & Terms of Reference
Metro Vancouver Presentation and Q&A <ul style="list-style-type: none">• Purpose of the Working Group is to:<ul style="list-style-type: none">○ Provide a forum for ongoing dialogue about the Food Sector Grease Interceptor (GI) Bylaw between Metro Vancouver (MV) staff and stakeholders.○ Present draft policy recommendations and gather input on potential impacts and barriers to implementation.○ Understand and consider needs, concerns and interests of participants.• Purpose of Bylaw Review<ul style="list-style-type: none">○ Address grease build up in sewers and reduce costs to maintain infrastructure.○ No final decisions have been made and final policy recommendations to be presented to GVD&DD Board in 2020.

- Review of Phase 1 Engagement
 - Held 11 small group meetings with a wide range of stakeholders
 - What we heard:
 - Consideration of retroactivity
 - Concerns about installation/upgrade costs
 - Confusion about sizing
 - Questions and concerns about fixtures (specifically dishwashers)
 - Consistency between jurisdictions
 - Current fines are not a deterrent
 - Need for the bylaw to help protect infrastructure

Policy Recommendations Topic 1 – General

- **Consistency between jurisdictions** – Updated language to align with BC Plumbing Code, City of Vancouver Building Bylaw and Canadian Standards Association (CSA) for sizing and installation of GIs. MV is proposing specific requirements for fixture connection and maintenance as well as clarity around conforming to CSA standard. There will be a dedicated technical meeting to discuss sizing (selection).

Participants and Metro Vancouver staff discussed the following:

- CSA doesn't test above 100gpm and the sizing methodology can require 250gpm. Any interceptor graded above 250gpm is approved by the manufacturer, not CSA.
- The bylaw allows for other standards, not limited to just CSA standard. Policy recommendations are to align bylaw with Plumbing Code and CSA standard. MV has written to CSA for clarity about standards and the 100gmp limitation.
- Group in agreement with proposed bylaw changes.

Policy Recommendations Topic 2 – Fixtures

- **Amendments to fixture connections** – All grease bearing fixtures must be connected to a GI: cooking equipment, sinks (including washing, pre-rinse, and barista), self-cleaning exhaust hoods, funnel/hub drains, plumbing equipment, equipment like food grinders and garbage compactors. Note that the definition for funnel/hub drains will be a new addition to the bylaw but the other items listed are consistent with the current bylaw.
- **Fixtures that must not be connected** – Consistent with the current bylaw, toilets, urinals and similar plumbing fixtures. Note that hand sinks have been removed from this list.
- **Proposed change for floor drains/mop sinks** – Will not be required to connect to a GI. If an inspection shows that any of the above are being used to dispose of FOG, the Sewage Control Manager may require a connection to a GI.
- **Proposed change for dishwashers** – Existing kitchens, at the time of the bylaw amendment adoption, do not have to connect dishwashers to a GI. Dishwashers will not have to be disconnected if already connected. New builds (after the date of the bylaw) will be required to connect dishwashers.

Participants and Metro Vancouver staff discussed the following:

- What mechanisms are available for enforcement? Haulers and maintenance providers are able to identify undersized or non-compliant units, but smaller customers may not be motivated if enforcement isn't outweighed by upgrade costs.
- MV process begins with officer inspection, discussion with owner/manager about non-compliance and a formal letter itemizing compliance issues. In circumstances where a food sector establishment (FSE) continues to be non-compliant, MV works through the plumbing and building codes to enforce compliance. MV can issue fees for re-inspection and sampling which are different than fines. As this bylaw is an environmental bylaw, it applies to all FSEs equally.
- Floor drains and mop sinks are generally not high generators of FOG, thus not requiring connection to GI.
- Proposed bylaw language will not require existing kitchens to connect their dishwasher to a GI. New builds will require connection.
- Group in agreement with proposed bylaw changes.

Policy Recommendations Topic 3 – Sizing (Selection)

- **Amendments to sizing methodology** – Revised methodology proposed is likely to result in smaller GIs. New language will provide clarity where CSA gives options or refers to local jurisdictions. The upcoming dedicated Technical Meeting will discuss sizing methodology in more detail. New methodology proposes using 75% of sink volume (in place of 100%) and there is no need to account for floor drains or mop sinks. Dishwashers will be exempt from sizing calculation for existing kitchens as of the date of the bylaw.

Participants and Metro Vancouver staff discussed the following:

- Sections where CSA is open to interpretation by local jurisdictions, MV will be specific with language where CSA is not.
- At completion of bylaw review, will information sheets for sizing calculation be made available to haulers/maintenance providers to determine proper sizing? It would be helpful to have something offline that works similar to reference material MV staff have previously provided as an Excel spreadsheet.
- MV will discuss during technical sizing meeting and look into developing sizing reference material that is available offline.
- Group in agreement with proposed bylaw changes.

Policy Recommendations Topic 4 – Maintenance

- **Grease Interceptor maintenance schedule** – Maintenance of GIs must occur at least once every 90 days or when FOG is 25% or more of wastewater (CSA requires every 4 weeks).
- **Non-conforming grease interceptor** – If GI is non-conforming (for sizing requirements) but all required fixtures are attached, FSEs are eligible to apply to the Sewage Control Manager for a more frequent maintenance program. The maintenance frequency will be determined by the Sewage Control Manager. Maintenance records must be submitted. This program is only

available for three years before requiring upgrades to meet the sizing requirement. The intent is after three years, the FSE has enough time to plan for and finance the necessary upgrades.

Participants and Metro Vancouver staff discussed the following:

- MV is exploring the option of a preferred hauler program.
- MV is exploring the option of a software system to allow for the submission of maintenance records directly to MV (online). Maintenance records could be submitted by the FSE, or the FSE can allow submission of records by their maintenance provider (hauler).
- Haulers/maintenance providers can only act upon the direction of their clients to submit documents to MV on their behalf.
- Group in agreement with proposed bylaw changes.

Policy Recommendations Topic 5 – Fees

- **Increased fees** – There have been no fee increases since 2012. Fees are designed to recover costs for re-inspection and sampling. There is no charge for initial inspections and there are not treatment or administration fees in the current or proposed amendments.
- **Proposed fee increases** – Re-inspection fees increase from \$300 to \$500. Sampling fees increase from \$150 to \$300.

Participants and Metro Vancouver staff discussed the following:

- Fees are designed to recoup MV operating costs only, fines are imposed by the courts and have legal ramifications.
- Currently FSE owners/operators are paying a large amount of fees from various regulators.
- Group in agreement with proposed bylaw changes.

Policy Recommendations Topic 6 – Other

- **Food trucks** – Must discharge wastewater to a facility with a GI (e.g. Commissary Kitchen).
- **Deep fryer grease** – Explicit prohibition of deep fryer grease going into sinks, drains or GIs. Deep fryer grease is usually collected free of charge.

Participants and Metro Vancouver staff discussed the following:

- Group in agreement with proposed bylaw changes.

Final Thoughts

Participants provided the following final thoughts:

- When will the bylaw come into effect?
 - The goal is to present the bylaw amendment, and related amendments to the Sewer Use Bylaw to the GVS&DD Board in March/April for reading (approval). If approved, it will become law. (Metro Vancouver staff response)

- Are plumbers aware of the new requirements?
 - MV met with plumbers during the small group meetings about possible changes. Another meeting with municipal plumbing and building inspection staff is planned in November. Municipalities receive plans for renovations or new builds and if requested, MV reviews the plans with respect to GI installations and the required fixtures to be connected. (Metro Vancouver staff response)

Next Steps

A Meeting Summary Report will be provided within three weeks of the meeting date and will be distributed to attending and non-attending participants.

The following are the upcoming meeting dates scheduled by Metro Vancouver:

- Technical Group Meeting (Nov 4)
- Municipal Meeting (Nov 13)
- Grinder & Digester Manufacturers Meeting (late January 2020)