

# Food Sector Grease Interceptor Bylaw Review:

## Municipal Update and Feedback Session

Reviewed and Approved for Issuance: January 6, 2020

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## Date & Location

Wednesday, November 13, 2019 1:00 p.m. – 3:00 p.m.  
 Metro Vancouver – 28th Floor Conference Centre  
 Metrotower Office Complex  
 4730 Kingsway  
 Burnaby

## Participants

<p>Dave Jarvis, Township of Langley          Wyatt Babcock, Township of Langley          Jatinder Brar, Township of Langley          James Nyhus, City of White Rock          James Storey, City of Maple Ridge          Norm Vito, District of West Vancouver          Kyle Van Veen, City of Coquitlam          Bryce Pollock, City of North Vancouver          Tom Oldale, City of New Westminster          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><b>Regrets</b>          Vincent Wong, City of Burnaby          Jon de Ruiten, City of North Vancouver          Tim Arlt, City of Surrey          Chantal Gemperle, City of Pitt Meadows          Alan Stewart, District of North Vancouver          Don Spindor, City of Port Coquitlam          Bob Lofgren, City of Coquitlam          Ted Swardh, City of Delta          Robyn McLeod, City of Port Moody          Jacek Redlinski, City of Richmond          Phil Wynne, City of Richmond</p>
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## Meeting Summary

Agenda Item
<p><b>Welcome, Agenda Review and Introductions</b></p>
<p><b>Metro Vancouver Presentation</b></p> <ul style="list-style-type: none"> <li>• Purpose of the Feedback Session:             <ul style="list-style-type: none"> <li>○ Update municipal members on stakeholder engagement to date</li> <li>○ Share draft policy recommendations and gather input on potential impact and barriers to implementation</li> <li>○ No final decisions have been made and final policy recommendations to be presented to GVD&amp;DD Board in 2020.</li> </ul> </li> </ul>

- Purpose of Bylaw Review
  - Address grease build up in sewers and reduce costs to maintain infrastructure.
  - Update bylaw language and provide clarity.
  - Review technical requirements and provide clarity on fixtures to be connected.
- 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
- Phase 2 engagement activities to-date
  - Working Group meeting #1 – Oct 22, 2019
  - Dedicated technical meeting – Nov 4, 2019
  - Food grinders and digesters meeting – early 2020

### Policy Recommendations 1-3

- 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. A dedicated technical meeting to discuss sizing (selection) was held on Nov 4, 2019.
- Topic 2 – Fixtures
  - **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 Fats, Oils and Grease (FOG), the Sewage Control Manager may require a connection to a GI.
  - **Funnel and hub drains** – New language defining funnel or hub drains will be added, these fixtures must be connected to a grease interceptor.
  - **Hand sinks** – Hand sinks have been removed from the list of fixtures that must not be connected to a grease interceptor
  - **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 adoption) will be required to connect dishwashers.
- 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 Standard gives options or refers to local jurisdictions. Dedicated Technical Meeting discussed 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:

● = Stakeholder comment

○ = Metro Vancouver comment

- If the local jurisdiction requires dishwashers to connect, then Section 5.3 of the CSA Standard is triggered, which requires the dishwasher be served by a dedicated grease interceptor. A separate grease interceptor for the dishwasher is preferred due to the heat of the water.
- Why are mop sinks not required? Inspectors frequently witness these sinks being used for cleaning.
  - The recommendation to remove the requirement to connect mop sinks is that findings from inspection show that most FSEs only use mop sinks for general cleaning, not cleaning grease laden items.
  - The issue with mop sinks/floor drains being required is that it can be challenging to find space for them below the floor when retrofitting an existing building. In addition, the language used to describe or label mop sink and floor drain fixtures in designs for new builds varies substantially, making it challenging to define and enforce connection of all similar fixtures.
  - The new bylaw would include a provision to allow Metro Vancouver to require connection if an inspection revealed that a mop sink or floor drain was being used to dispose of wastewater containing FOG.
- The BC Plumbing Code suggests that connection of mop sinks is not required if the mop sink is not located in a kitchen.
- Connection of mop sinks in kitchens should be a requirement in new builds or if doing extensive renovations, as there is ability in design process to accommodate placement of the grease interceptor.
- Alignment of sizing methodology with CSA Standard will make things easier for inspections officials. Important to note that CSA sizing is a minimum and that a larger size unit can be required.
- Ensuring sizing requirements are met is challenging as plumbing officials visit FSE one time for inspection and equipment can be replaced with a different size unit afterwards.
- The manufacturer's peak flow rates for fixtures such as dishwashers are used for determining sizing of grease interceptor.
- Plumbing officials will refer to the edition of the CSA Standard cited in the BC Plumbing Code, unless the Ministry directs otherwise, which is unlikely. The next BC Plumbing Code update is anticipated to be in 2022.
- Questions have been raised regarding whether grease interceptors are fireproof. Has anyone come across this?
  - A grease interceptor that is rated to be non-combustible should be required (as part of a non-combustible plumbing system) if the building classification requires non-combustible building materials.
- Do the policy recommendations apply to new builds and existing construction? This is different from the BC Plumbing Code, which only applies to new construction.
  - A distinction must be made between plumbing or building codes, which apply to new construction and are not retroactive (i.e. do not apply to pre-existing construction) and the Food Sector Grease Interceptor Bylaw. The bylaw is an environmental regulatory bylaw and applies to new kitchens, but also to existing kitchens and maintenance

practices. This is necessary in order to work towards solving the FOG issue. In the small group meetings held earlier in the engagement process, FSEs of various sizes noted confusion regarding retroactivity and “grandfathering”, due to the misconception that the bylaw, like the BC Plumbing Code, did not apply to existing construction. Some large FSE chains also noted challenges with planning for upgrades to grease interceptor technology to meet regulatory standards, particularly as some chains have 10-15 year premises refurbishment cycles.

#### **Policy Recommendation 4 & Other Recommendations**

- Topic 1 – 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).
  - **Guideline for maintenance providers** – Metro Vancouver is developing a guideline for grease interceptor maintenance providers (not part of bylaw review).
  - **Electronic Records Submission** – Metro Vancouver is investigating electronic records submission and a preferred hauler program (outside of bylaw review).
  - **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.
- Other Recommendations
  - **Fees increasing** – 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 re-inspection fee increase from \$300 to \$500, and proposed sampling fees increase from \$150 to \$300.
  - **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:

- = Stakeholder comment
- = Metro Vancouver comment

- The non-conforming grease interceptor option will only be available for FSEs that have all the required fixtures connected to the existing grease interceptor at the time the bylaw is adopted, otherwise the FSE is out of compliance because required fixtures are not connected to a grease interceptor.
- For FSEs choosing the non-conforming grease interceptor program, the registration will need to run with the property, not the business, as there can be high turnover in the industry.
- Communication with property owners/landlords will be important in addition to communication with businesses.
- Often, prospective property or business owners are not aware of what upgrades will be required to bring the premises in compliance with applicable bylaws and codes.
  - Process for reporting for the program is currently in development. Staff need to look at options for ensuring status and requirements of program will be passed on to new owner(s) if the business and/or property changes hands.
- An annual fee during three-year participation in the program would be one way to ensure a check-in with current property and/or business owner each year.
  - There will need to be a grace-period of some length to allow FSEs to learn about the bylaw changes and develop a plan to work towards compliance.
- The number of food trucks (i.e. size of client base) using a particular commissary kitchen needs to be considered when determining sizing of grease interceptor for such facilities. A specific definition for grease interceptors used for this purpose may be needed.

### Food Grinders and Digesters

Participants and Metro Vancouver staff discussed the following:

- = Stakeholder comment
- = Metro Vancouver comment

- MV is seeing an increase in food grinders and digesters in larger FSEs such as supermarkets and hotels.
- How much maintenance is required for these units?
  - Some manufacturers or suppliers require that FSEs sign on to a maintenance plan at time for purchase.
- The BC Plumbing Code defines a “fixture” as something that discharges sewage or a substance that is not “clear water waste”, so food grinders and digesters fall under the definition of a “fixture”. Fixtures have to conform to the standards in the BC Plumbing Code. Food grinders and digesters could be considered an “alternative solution” provided they meet the functional statements/objectives/intent statements of that section of the BC Plumbing Code.
  - For Metro Vancouver, the concern with food grinders and digesters is the discharge of higher strength waste.
- Fraser Health may have some regulation or requirements around food grinders and digesters, as the health officers review each kitchen plan for compliance.

## Next Steps

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

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

- Grinders & Digesters Group Meeting – TBD (spring 2020)
- REAC-LWS/REAC – TBD (early 2020)

The next round of meetings between municipal staff and Metro Vancouver Environmental Regulation and Enforcement will be held in 2020, after the adoption of the amendment bylaw.

Metro Vancouver staff plan to present the proposed policy recommendations to the Liquid Waste Committee and GVS&DD Board in spring 2020.

The existing bylaw remains in effect until an amendment bylaw is adopted by the GVS&DD Board; the topics discussed at this meeting are policy recommendations at this point.