



Clean Water Summit Partners
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Summit Partners:
- Bay Area Clean Water Agencies (BACWA)
- California Association of Sanitation Agencies (CASA)
- Central Valley Clean Water Association (CVCWA)
- California Water Environment Association (CWEA)
- Southern California Alliance of Publicly Owned Treatment Works (SCAP)

February 28, 2012

Via Electronic and U.S. Mail

Dave Viola
Director of Special Services
IAPMO
5001 E. Philadelphia Street
Ontario, CA 91761
18927 Hickory Creek Drive, Suite 140
Mokena, IL 60448

Subject: Green Plumbing and Mechanical Code Supplement Proposals PC-51 and PC-52

Dear Mr. Viola

The undersigned California clean water associations, otherwise referred to as the Clean Water Summit Partners, is a coalition of statewide and regional organizations representing local public agencies engaged in providing clean water services to their communities. Included in the Clean Water Summit Partners are the California Association of Sanitation Agencies (CASA); the Bay Area Clean Water Agencies (BACWA); the Central Valley Clean Water Association (CVCWA), the Southern California Alliance of Publicly Owned Treatment Works (SCAP), whose collective members serve over 90 percent of the sewered population of California, and the California Water Environment Association (CWEA) that includes over 9,000 individual members working in the water quality field within the State of California. Tri-TAC (www.tritac.org) also endorses the Clean Water Summit Partners position.

The purpose of this letter is to address a proposed addition to the Green Plumbing and Mechanical Code Supplement (*Green Supplement*), specifically Article 307.1 of PC-51 and PC-52. The article as currently proposed states "Food waste shall be collected for beneficial reuse or shall be disposed to the sanitary drainage system through a food waste grinder". Although some Publicly Owned Treatment Works (POTWs) who operate wastewater treatment plants may agree with the idea of diverting food waste from landfills for beneficial reuse purposes, California POTWs and most private sewer owners generally oppose using a food grinder or pulper as a means to direct additional food wastes to the sanitary sewer system. These added materials can create multiple problems such as debris settling, odor generation, and corrosive atmospheres in the private and publicly owned gravity sewer systems, particularly when less water is being discharged as the result of water conservation (a common green practice in many regions). They also can negatively impact wastewater treatment plants due to increases in treatment required to process the additional loading from the food waste.

Since 2006, California POTWs and sanitary sewer system owners have been under an order from the State Water Resources Control Board (WDR 2006-0003) to have a sewer system maintenance plan that includes as one of its elements, a Fats, Oils, and Grease (FOG) control program. A basic provision of most FOG control

programs is the requirement to not put FOG, in any form, down the drain. The Clean Water Summit Partners' member agencies are currently engaged in continuing campaigns throughout the state to educate food service establishments and the general public to not put FOG or solid food waste down the drain. The logic behind this campaign is that fats, oils, and grease stick to food; therefore, putting solid food waste into a food grinder invariably puts FOG down the drain. The proposed article advises that solid food waste be discharged to the sewer system, which is contrary to the basic provision of FOG control programs not only in California, but in the majority of programs throughout the United States.(Complete information on WDR 2006-0003 is located at http://www.waterboards.ca.gov/water_issues/programs/sso/index.shtml.)

As IAPMO is likely aware, local wastewater discharge regulations, or ordinances, constitute an essential component of environmental law and give municipal agencies the power to control operations at facilities within their jurisdictions. The ordinances, being authorized under the Clean Water Act or California Water Code, will supersede the regulations found in the *Uniform Codes*. Many wastewater ordinances prohibit the installation of food grinders in new food service establishments and may even require the removal of grinders in existing facilities. Some agencies take the additional step of issuing a permit that includes this prohibition to ensure there is an enforceable mechanism to compel compliance. Needless to say, agencies that have such a prohibition will have a conflict with the proposed article and would not like having the plumbing code, or even the *Green Supplement*, lean in that direction.

While one can argue that food waste may supplement methane production in the anaerobic digestion process used by POTWs to treat residential sanitary waste streams, there are many problems associated with handling additional loading from commercial food service establishments through the sewer system. It is important to note that not all wastewater treatment plants have anaerobic digesters and are therefore poised to capture digester gas. Moreover, the additional solids loading from food waste to a conventional secondary treatment process, if introduced through the headworks, may require more energy to process in the secondary system than it can recover via production of digester gas. Additionally, solids loading from a food grinder in a commercial establishment can quite easily contribute to flow restrictions or blockages that could lead to a sanitary sewer overflow (SSO). These overflows are such a critical public health matter and environmental concern that California now requires all sewer agencies to publicly report every SSO that occurs in their system. Food wastes can also create sanitary sewer overflows which are subject to direct fines from the State of California, possible fines and lawsuits from the United States Environmental Protection Agency and citizen groups, respectively, if overflows reach applicable federal waterbodies. Another major concern is the operational costs of cleaning the FOG and solids from the sewer lines to ensure adequate hydraulic capacity to carry the sanitary waste which is, after all, the number one priority of the sewer system.

Due to these concerns, the associated wastewater agencies would like to endorse the alternative wording suggested by the Orange County Sanitation District which modifies 55-PC1 and/or 55-PC2 Article 307.1 as follows:

Food waste shall be collected for beneficial reuse such as composting or vermiculture, direct discharge to an anaerobic digester, or conversion to livestock feed. If a grinder or pulper is

used to process the food waste at the collection site before its transfer to the point of reuse, then the effluent from such device must be strained to prevent food solids or particles from entering the sewer system.

Such a modification allows for an on-site grinder or pulper to precondition the food wastes if a municipality wishes to have that as an option, but also protects the sewer system from the food solids loading. The strainer also protects the hydraulic capacity of a downstream grease interceptor if an establishment is so equipped. This approach continues to promote green reuse of food waste for agriculture or energy generation without negatively impacting the public sewer system.

The Clean Water Summit Partners wish to thank IAPMO for promoting public health, safety, and welfare through the development and promotion of the *Uniform Codes* and *Green Supplement*, and for consideration of our concerns regarding this food disposal issue. Specific questions regarding this letter can be addressed to John Pastore, Executive Director of SCAP at jpastore@scap1.org.

Sincerely,



Amy Chastain, Executive Director
Bay Area Clean Water Agencies



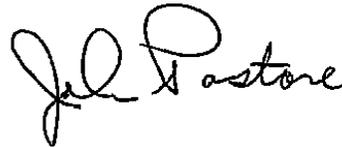
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