

Pre-Treatment Device Compliance Procedure



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University of Texas, Austin

A. Policy Statement

The University of Texas at Austin (UT Austin) is dedicated to protecting the environment by preventing the discharge of pollutants to public treatment works in excess of allowed levels. UT Austin is committed to full compliance with pretreatment plan review requirements of the City of Austin.

B. Scope

This procedure applies to all organizational units of UT Austin that design, construct, install, modify; (or contract for the design, construction, installation or modification of) facilities which may require wastewater pretreatment devices. Specific departments involved in the installation, renovation or removal of these devices, **including but not limited to:** Project Management and Construction Services (PMCS), Capital Projects and Construction (CPC), Athletics, Texas Union and University Housing and Dining must follow this compliance procedure.

IMPORTANT: For the establishment of a food service location, notification to EHS is required regardless of whether a pre-treatment device is required.

C. Definitions

Acid Neutralization Device – tank, pit, equipment, or process intended to neutralize acidic effluent from a building or process.

Effluent – discharge from a process or facility or device.

EHS – UT Austin's Environmental Health and Safety department.

Grease Interceptor (Trap) – tank installed downstream of a kitchen, or other food preparation or handling area, intended to allow fats, oils, or greases to cool and separate from other liquid effluent.

Grit Trap – tank installed downstream of a car wash or similar facility. It is intended to capture grit, sediment, and accompanying oils or greases from wastewater effluent.

Oil/Water Interceptor – multi-compartment tank designed to prevent discharge of oil layer effluent, while allowing other effluent to pass through the device.

POTW – Publicly Owned Treatment Works. Facility of the local municipality engaged in the treatment of sanitary sewer effluent prior to discharge to the environment.

Pretreatment Device – devices, equipment, or processes intended to improve the quality of effluent prior to discharge to the local POTW, including but not limited to:

- Acid neutralization devices
- Activated carbon filters
- Amalgam separators
- Grease interceptors
- Lint traps
- Metal exchange units
- Oil/water separators
- pH neutralization systems
- Plaster or paint traps
- Sand filters
- Solids (e.g. grit) traps
- Silver traps

UT Austin – The University of Texas at Austin and all its facilities, in Austin and out of town.

Wastewater – effluent conveyed by the sanitary sewer system to local POTW.

Section I. Responsibilities

A. Environmental Health and Safety

Currently the EHS Director is the single point of contact regarding compliance with the City of Austin pretreatment requirements. EHS reviews the “Pre-treatment Device Notification Form” submitted by a UT employee. For P3 projects, the project may be submitted by a contractor. EHS will review and approve or reject plans for installation of new pretreatment devices or modifications to existing devices. EHS will submit plans for these devices to the City of Austin or to any other appropriate local POTW for approval. Once approval has been given to EHS for the pretreatment device, EHS will then issue to the requestor the “EHS Pre-treatment Device Approval Form” for each pretreatment device project. Additional information and copies of the applicable forms can be found at <http://www.ehs.utexas.edu>

B. Colleges, Departments, Other Organizational Units

Deans, Directors, Department Heads and other organizational units at UT Austin are responsible for ensuring that the requirements below are followed.

All organizational units that will be undertaking a project that may have the potential to include the installation, modification, or removal of a pretreatment device; will notify the Director of EHS using the “Pre-treatment Device Notification Form”.

For all proposed projects involving a food establishment (regardless of size), notification must be made no less than 60 days prior to the end of the design phase of a project. Such notification shall be separate from other plan submittals and the plan review process.

All organizational units will also submit plans to EHS for compliance review and will not proceed with a project until such approval has been received from EHS Director or his/her designee. These drawings must include a dye testing plan for future implementation.

All entities involved in UT Austin projects will communicate with UT Austin EHS on issues concerning wastewater pretreatment. Projects shall not communicate directly with the City of Austin or any other POTW operator.

Section II. Design, Construction, and Installation Requirements

A. Grease Traps/Interceptors

All fixtures with a potential to carry grease-bearing waste shall be plumbed to the grease trap. Garbage disposals, grinders, or other similar devices are not authorized in commercial kitchens.

Grease interceptors at all UT Austin facilities will be designed in accordance with PMCS Division 22 and the City of Austin design criteria located on the EHS website. Sizing of grease interceptors will be in accordance with the City of Austin's sizing criteria found on the EHS website.

Installation will not occur until EHS has approved the design, size and manufacturer. EHS and UEM must inspect the project prior to backfilling. EHS and UEM must be contacted to observe dye testing before installation will be considered complete.

B. Grit Interceptors

Grit interceptors will be designed in accordance with City of Austin criteria located on the EHS website.

C. Acid (pH) Neutralization Devices

Plans to utilize acid neutralization devices require prior discussion with EHS and adequate lead time for planning. These devices will not normally be allowed.

D. Other Pre-treatment Devices

All other pre-treatment devices will be discussed and reviewed on a case by case basis. For Assistance with this guideline contact Environmental Programs staff at 512-471-3511.

Section III. Maintenance Requirements

A. Grease Traps/Interceptors

All grease traps are serviced by a licensed contractor by pumping all material from the trap and pressure washing the trap a maximum of every 90 days unless permission to suspend pumping is granted through UT Austin EHS Department. For example, suspending required cleaning may be possible when a kitchen will be out of service for an extended period of time.

Grease traps may require more frequent servicing if the grease concentration in the trap/interceptor is greater than 45% Fats, Oils, and Grease (FOGs). UT EHS will monitor FOGs and notify customers in advance when their levels continually exceed 45%.

No enzymes are to be added to the grease trap or any plumbing that leads to the grease trap including floor drains.

Waste haulers are required to provide a "trip ticket" or manifest for each trap/interceptor that is serviced, and no later than 30 days after service. UT EHS reviews these manifests to ensure that they include the following information:

- a. The percent FOGs.
- b. The stamp from the facility that received the waste from the truck, to ensure that the waste is being properly disposed of.

B. Other Pre-treatment Devices

UT maintenance staff monitor all other pre-treatment devices such as grit traps, mud traps, lint traps and oil-water separators, and notify EHS when these units need to be serviced. These devices are inspected on a regular basis and serviced as needed by a licensed contractor. The same rigorous manifesting procedures and review that is applied to grease trap servicing is also applied to the other pre-treatment devices.



John Salsman
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7-22-2019

Date