



City of Millbrae

Fats, Oils and Grease (FOG) Policy for Food Service Establishments

Final
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Table of Contents

1.0	INTRODUCTION.....	1
2.0	DEFINITIONS.....	1
3.0	PERSONNEL RESPONSIBILITIES.....	2
3.1	Environmental Compliance Inspector.....	2
3.2	Laboratory/Source Control Supervisor	2
3.3	Superintendent of WPCP	3
3.4	Director of Public Works.....	3
3.5	City Attorney	3
4.0	GREASE REMOVAL DEVICE REQUIREMENTS.....	3
4.1	New Food Service Establishment.....	3
4.2	Major Remodel	4
4.3	Existing Food Service Establishments Upstream of Sewer Line “Hot Spot”	4
4.4	Grease Traps	5
4.5	Existing Food Service Establishments Not Upstream of “Hot Spot”	5
5.0	REQUIREMENTS FOR FSEs SUBJECT TO THIS POLICY.....	6
5.1	Permit Waiver	6
5.2	Grease Recycling Bin	6
5.3	No Stormwater Pollution	7
5.4	GRD Additives Prohibited.....	7
5.5	Food Grinders Prohibited.....	7
6.0	MAINTENANCE REQUIREMENTS FOR GRDs.....	7
6.1	Grease Interceptors and Large Grease Traps.....	7
6.2	Grease Traps	8

LIST OF TABLES

Table 1. Grease Removal Device (GRD) Installation Requirements	6
Table 2. Grease Removal Device (GRD) Maintenance Requirements	9

APPENDICES

Appendix A	Example FSE Wastewater Discharge Permit
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1.0 INTRODUCTION

The State Water Resources Control Board (SWRCB) Order No. 2006-003-DWQ, *Statewide General Waste Discharge Requirements for Sanitary Sewer Systems* includes requirements for a Sanitary Sewer Management Plan (SSMP). The City of Millbrae's (City's) SSMP includes a Fats, Oils and Grease (FOG) Control Program. The FOG Control Program works in conjunction with the City's preventative maintenance program to prevent FOG related Sanitary Sewer Overflows (SSOs). The Water Pollution Control Plant (WPCP) Environmental Service Group is responsible for administering the City's FOG Control Program.

The legal authority to implement, monitor and enforce the elements of the FOG Program in the City's service area is in the City of Millbrae Municipal Code Chapter 8.20 *Municipal Sanitary Sewer* and Chapter 9.25, which adopts the California Plumbing Code.

This Policy serves as a guide to implementing the FOG Control Program and preventative maintenance program with specific direction for the installation and maintenance of grease removal devices (GRD) in food service establishments (FSE).

2.0 DEFINITIONS

Best Management Practices (BMPs): Procedures or actions which may eliminate or reduce the amount of pollutants or constituents discharged or eliminate a specific discharge to the sewer system. May include schedule of activities, prohibition of practices, maintenance procedures, other management practices, treatment requirements, operating procedures, and practices to control plant site runoff, spillage or leaks, sludge or waste disposal, or drainage from raw material storage.

Fats, Oils and Grease (FOG): means any animal or vegetable-based fats, oils, and grease generated from food preparation, food service, and kitchen cleanup.

Food Service Establishment (FSE): includes, but is not limited to, any facility preparing and/or serving food for commercial use or sale. This includes restaurants, cafes, lunch counters, cafeterias, hotels, hospitals, convalescent homes, factory or school kitchens, catering kitchens, bakeries, grocery stores with food preparation (excluding stores with only food-warming operations), meat cutting and preparation, and other food handling facilities not listed above where fats, oils, and grease may be introduced into the sanitary sewers

Grease Removal Device (GRD): means a device used to remove FOG from kitchen waste discharged to the sanitary sewer, i.e., a grease interceptor, grease trap, or other mechanical device.

Grease Interceptor (or Interceptor): means a GRD consisting of a portioned vault, with a minimum volume of 750 gallons, that is typically installed inground or underground and outside of the building which it serves.

Grease Trap (or Trap): means a GRD designed to serve one to four (4) kitchen fixtures. Traps are usually 50 gallons or less in volume and are typically located inside a kitchen, under the sink, or in the floor.

Major Remodel: means a remodel which includes significant change to the kitchen and which has a building permit valuation of at least \$100,000, not including the purchase and installation cost of any GRD installed during the remodel.

New Food Service Establishment: means a) a new building which will contain a FSE; b) the installation of a FSE in an existing building which has not previously contained a FSE requiring a Plan Check from the City.

Sewer Line “Hot Spot”: means a location in the sanitary sewer system where one or more FOG-related sewer overflows have occurred that requires significantly increased maintenance to prevent FOG-related line blockages, and/or where a significant potential exists for FOG-related line blockages to occur. The designation of a “Hot Spot” will be solely at the discretion of the City, based on the history and characteristics of the location.

Uniform Plumbing Code: means the “2019 California Plumbing Code” (California Code of Regulations, Title 24, Part 5). If there are future revisions to the UPC that relate to sizing of GRDs, the City reserves the right to use either the present or revised UPC, as appropriate.

Working Capacity: means the total volume of solids, water, and grease that a Grease Interceptor or grease trap is designed to contain under normal operating conditions.

3.0 PERSONNEL RESPONSIBILITIES

3.1 Environmental Compliance Inspector

The Environmental Compliance Inspector (ECI) is responsible for the day-to-day implementation and enforcement of the FOG control program. The ECI’s duties are to:

- Perform inspections and prepare inspection reports.
- Maintain and update the permitted FSE inventory list.
- Manage the FSE permit process (applications, permits, renewals).
- Prepare informal (WN) and formal notices (Late Notices, NOV, fines, etc).
- Inform Laboratory Source Control Supervisor of IU violations,
- Review Planning Department applications for applicable FSEs that must install GRDs and approval of GRD types and sizes.

3.2 Laboratory/Source Control Supervisor

The Laboratory/Source Control Supervisor monitors the ECI’s actions and manages the FOG Control Program. The Supervisor’s duties are to:

- Manage activities and enforcement measures of the Environmental Compliance Inspector.
- Review and issue NOVs.

- Review and sign for fines issued.
- Recommend and prepare enforcement actions (AO, SCO, CDO, etc.)
- Review Planning Department applications for applicable FSEs that must install GRDs and approval of GRD types and sizes.

3.3 Superintendent of WPCP

The Superintendent has direct responsibility for the FOG Control Program. The Superintendent duties are to:

- Review and sign for fines issued.
- Issue permits and Administrative Order enforcement actions (AO, SCO, CDO, etc.)
- Hear IU appeals.
- Suspend or revoke discharge permits

3.4 Director of Public Works

The Director's duties are to:

- Conduct SC hearings for appeals.
- Make final decision of fine for Show Cause hearing.
- Issue order to restrict, suspend or disconnect a user from the City's wastewater collection system.

3.5 City Attorney

The City Attorney's duties are to:

- Advise staff during enforcement matters as required
- Manage civil and criminal litigation on behalf of the City

4.0 GREASE REMOVAL DEVICE REQUIREMENTS

All new FSEs, all existing FSEs undergoing a Major Remodel and all existing FSEs upstream of a Sewer Line "Hot Spot" shall have at least one GRD, as specified below. See also Table 1.

4.1 New Food Service Establishment

A new FSE, as defined in the Definitions section above, is a new building which will contain a FSE or the installation of a FSE in an existing building which has not previously contained a FSE requiring a Plan Check from the City. A business will not be considered a new FSE solely on the basis of a change of menu, name, and/or ownership.

All new FSEs shall install an Interceptor sized in accordance with Appendix H of the Uniform Plumbing Code (UPC). Interpretation of Appendix H and the variables used in the sizing calculation shall be at the discretion of the City. The City will accept interceptor sizing based on Appendix H updated by the International Association of Plumbing and Mechanical Officials (IAPMO) although changes may not be in the UPC currently codified by the City.

The interceptor shall drain all fixtures and equipment in the establishment which may receive FOG, including but not limited to utensil sinks, food preparation sinks, hand washing sinks in kitchen areas, mop sinks, and floor drains and floor sinks in kitchen and washing areas. The dishwashing machine shall be plumbed to the interceptor, unless specified otherwise by the City. Any discharge to the sanitary sewer from routine cleaning of exhaust hoods and ducts shall be plumbed to the interceptor. No drains from toilets, showers, or other domestic discharges shall be connected to the interceptor.

If there is an outside refuse area and/or washing area plumbed to the sanitary sewer it must drain to the kitchen interceptor or to another properly sized interceptor. Note any proposed outside refuse area and/or washing area plumbed to the sanitary sewer should also be covered and bermed to prevent discharge to storm drainage.

4.2 Major Remodel

Any FSE which is: a) upstream of a Sewer Line “Hot Spot,” as defined above; and b) undergoing a Major Remodel, as defined above, shall install an interceptor. The requirements shall be the same as for a new FSE, except for the following:

1. A remodeled FSE may be allowed to not connect some minor kitchen drains, such as hand washing sinks or floor drains, where connection of these drains to the interceptor would require excessive replumbing. The determination shall be solely at the discretion of the City, on a case-by case-basis. For any drain exempted from connection to the interceptor, the FSE shall maintain employee training and/or signage to prevent discharge of FOG to the drain.
2. Any FSE which is not upstream of a Sewer Line “Hot Spot” but is undergoing a Major Remodel, as defined above, shall install, at a minimum, one or more grease traps, as required for an existing FSE which is upstream of a “Hot Spot”.

4.3 Existing Food Service Establishments Upstream of Sewer Line “Hot Spot”

The City will maintain a current list of the locations designated as “Hot Spots”. The list will reference the evidence supporting each designation. Such evidence may include, but is not limited to, maintenance records, SSO reports, or videotapes. The designation of a “Hot Spot” shall be solely at the discretion of the City. The minimum GRD requirement for any FSE above (upstream) a designated “Hot Spot” shall be one or more traps draining at least the utensil sinks and dishwasher prerinse sink (scrap sink). The sizing of the trap(s) shall be as follows:

1. For FSEs that do not currently have any GRD in place, the installed trap(s) shall be sized in accordance with Table 102 in Chapter 10 of the UPC, or subsequent revisions, at the discretion of the City. Manufacturer specifications may be used instead of the UPC table, if adequate documentation is provided to assure the City that the trap size is appropriate for the fixtures drained.
2. Existing FSEs with one or more traps currently installed shall not be required to install a larger trap if the size of the trap is at least 70% of the size specified by Table 102 in

Chapter 10 of the UPC. Those FSEs with installed traps sized at less than 70% of the UPC requirement shall be required to install larger or additional traps to meet the appropriate sizing requirement of the UPC.

3. The City reserves the right to require installation of an interceptor if such installation is appropriate due to the size, menu, and location of the FSE.

FSEs upstream of a designated “Hot Spot”, that have a grease trap meeting the requirements in this Section, will be issued a wastewater discharge permit. The permit shall authorize the FSE to discharge from their kitchen drains without installation of an interceptor. However, if the City determines that the FSE's grease trap(s) and operating practices are inadequate and the FSE continues to contribute significant quantities of FOG to a downstream Sewer Line “Hot Spot,” the permit can be revoked and the FSE shall be required to install an interceptor. If the permit is revoked, the FSE shall be subject to the same requirements as described above in Section 4.2 for a FSE upstream of a “Hot Spot” and undergoing a Major Remodel. Such revocation will only occur after the City has worked with the permittee to resolve the problem and has documented reasonable evidence that FOG discharges from the FSE are contributing to the “Hot Spot” problem

[4.4 Grease Traps](#)

All grease trap installations (existing traps or new installations) shall comply with all of the following requirements (note that these requirements do not apply to interceptor installations):

- Dishwashing machines shall not drain to a Grease Trap, unless the FSE can document that the volume and temperature of wash water and rinse water discharged, in combination with any detergent, soap, and/or disinfectant in the water, will not render the Trap ineffective.
- All new or existing Grease Trap installations shall comply with 1014.3 of the UPC. This requires a flow control device, meeting certain criteria, to be installed either on each fixture drain before the trap inlet or at the trap inlet itself.
- For any kitchen drain not connected to the Grease Trap, the FSE shall maintain employee training and/or signage adequate to prevent discharge of FOG to the drain.
- Installation of specialized grease removal devices of proprietary design, such as the Big Dipper, will be considered by the City on a case-by- case basis. Approval will be contingent on demonstration that the device will reliably perform at least as well as a conventional Grease Trap meeting the requirements of the UPC.

[4.5 Existing Food Service Establishments Not Upstream of “Hot Spot”](#)

Existing FSEs that are not upstream of a Sewer Line “Hot Spot” do not have permit or GRD requirements. However, owners and operators of such establishments should consider that if the FSE discharges sufficient amounts of FOG to cause an obstruction in the sanitary sewer, they would be in violation of City Municipal Code Section 8.20.290(D)(11) and 8.20.485. Such

discharge would also be likely to plug the FSE's drain lines, causing sewage back-ups into the kitchen.

Upon request, City personnel will provide FSEs with information regarding employee training and GRDs to minimize FOG discharge to the sewer.

Table 1. Grease Removal Device (GRD) Installation Requirements

FSE Type	Grease Removal Device Requirements
New FSE	Interceptor
Major Remodel upstream of a "Hot Spot"	Interceptor
Major Remodel not upstream of a "Hot Spot"	Grease Traps
Existing FSE upstream of a "Hot Spot"	Grease Traps (draining at least the utensil sinks and dishwasher prerinse sink) OR Interceptor if deemed appropriate by City
Existing FSE not upstream of a "Hot Spot"	No requirement

5.0 REQUIREMENTS FOR FSEs SUBJECT TO THIS POLICY

All new FSEs, Major Remodels, and all existing FSEs upstream of a Sewer Line "Hot Spot" are subject to this Policy and will have a wastewater discharge permit issued by the City and at least one grease removal device (GRD), as described in this Policy. The sole exception is any FSE granted a permit waiver, as discussed in Section 5.1 below. All FSEs that are subject to this Policy must comply with the requirements of Sections 5.2 through 5.5 below, unless granted a permit waiver.

5.1 Permit Waiver

All FSEs must have a current wastewater permit issued by the City, unless the City grants a permit waiver. Waivers will be granted only to those FSEs that can demonstrate to the satisfaction of the City that they are not a significant source of FOG. This will normally be the case only if there is no cooking or cleanup taking place at the facility.

5.2 Grease Recycling Bin

All FSEs shall have a bin or drum for collecting waste kitchen grease and used cooking oil. FOG cleaned out of grease traps shall not be placed in this container, as it is more difficult to recycle. The container shall be used and maintained adequately to prevent spillage or leakage.

The container shall be serviced (emptied or exchanged) and recycled in a legal manner at an appropriate frequency. Receipts or other documentation of such service shall be retained at the FSE and presented to City staff on request. The FSE shall maintain adequate employee training and/or kitchen signage to assure that the container is used and maintained in an appropriate manner.

5.3 No Stormwater Pollution

All FSEs shall operate so as to prevent any discharge of FOG or other wastes to storm water drainage in violation of City Municipal Code Chapter 8.70 *Storm Water Management and Discharge Control*. Serious or repeated discharges to storm drainage from an FSE will be referred to the appropriate City staff for enforcement action.

5.4 GRD Additives Prohibited

Addition of enzymes, solvents, or emulsifiers to GRDs (grease Traps or Interceptors) or to drains leading to these devices is prohibited

5.5 Food Grinders Prohibited

A food grinder (garbage disposal) shall not discharge to a GRD (Grease Trap or Grease Interceptor).

6.0 MAINTENANCE REQUIREMENTS FOR GRDs

The wastewater permit issued to an FSE will specify the required minimum frequency for maintaining (pumping or hand cleaning) the GRD(s) and how the FSE will verify this maintenance.

Regardless of the frequency of maintenance, any GRD with a combined level of floating FOG and settled solids in any compartment which exceeds 25% of the liquid depth of that compartment will be considered to be in violation.

All vents, baffles, inlet and outlet devices, and flow control devices necessary for proper operation of the GRD must be in place and in working condition at all times.

All GRDs shall be completely cleaned out and left empty by a registered transporter of inedible kitchen grease, as described in 6.1, prior to the closure of a FSE, the associated building or a change in ownership. In the event the tenant cannot be located the building owner shall assume responsibility for cleaning the GCDs.

6.1 Grease Interceptors and Large Grease Traps

For an FSE with a Grease Interceptor or a Grease Trap larger than 30 gallons liquid capacity (35 gpm rating / 70 pound grease storage capacity), the Interceptor or Trap shall be pumped (i.e., all compartments pumped empty) and the contents legally disposed at a minimum frequency of once every three months. The City may require more frequent pumping if inspections by City staff indicate that pumping every three months is not adequate. At the discretion of the City, the required frequency may be reduced if the FSE provides documentation (e.g., hauler certifications) adequate to establish that less frequent pumping would suffice. Such documentation shall be based on a minimum of one year of quarterly pumping and will be verified by City inspections.

All pumping shall be performed by persons who are certified by the California Department of Food and Agriculture (DFA) as a registered transporter of inedible kitchen grease. The pumper

shall transport the pumped waste to an authorized receiving facility, as defined by the DFA. DFA regulations require the pumper to provide the FSE with a waste removal receipt which includes the name of the FSE, the date of the pumping, the working capacity of the Interceptor pumped (see Section 2.0 Definitions) and the total gallons pumped.

6.2 Grease Traps

FSEs with a grease trap of 30 gallons liquid capacity (35 gpm rating / 70 pound grease storage capacity) or less may choose to comply with the procedure specified in Section 6.1 above, except that the minimum pumping frequency shall be monthly, unless modified in the permit, as described above.

All FSEs with a grease trap of 30 gallons liquid capacity (35 gpm rating / 70 pound grease storage capacity) or less who do not choose to comply with the above shall comply with the procedure specified below:

- The Grease Trap shall be cleaned by FSE staff and/or a contractor, at a minimum frequency of once every 15 days. The City may require more frequent cleaning if inspections by City staff indicate that cleaning every 15 days is not adequate. At the discretion of the City, the required frequency may be reduced if the FSE provides documentation (e.g., logbook observations) adequate to establish that less frequent cleaning would suffice. Such documentation shall be based on a minimum of six months cleaning at a minimum 15-day frequency and will be verified by City inspections.
- Persons cleaning a Trap shall assure that all grease and sediment is removed and appropriately disposed. They shall also assure that all baffles, flow control devices, and other equipment are properly installed subsequent to the cleaning. All wastes removed from the Trap during cleaning shall be placed in a drum or other dedicated container and be removed by a registered transporter of inedible kitchen grease, as described in Section 6.1 above. The trap waste may not be placed in the grease recycling bin specified in Section 5.2, unless the grease hauler provides written certification that this is acceptable and the hauler complies with all DFA regulations for inedible kitchen grease.
- Cleaning of a Trap shall be documented on a log sheet maintained by the FSE. The log sheet shall include, at a minimum, the date of the cleaning event, the name of the person(s) performing the cleaning, their signature, the quantity of waste removed from the Trap, and any other relevant observations. The completed log sheets shall be maintained onsite for a minimum of three years and provided to City staff on request. The FSE shall provide to the City a copy of their current log sheet at a frequency specified by the FSE permit.

Table 2. Grease Removal Device (GRD) Maintenance Requirements

GRD Type and Size	Frequency	Pumping Requirements
Interceptor or Grease Trap > 30 gallons liquid capacity (35 gpm rating / 70 pound grease storage capacity)	Once every 3 months ¹ (i.e. quarterly)	DFA registered transporter
Grease Trap ≤ 30 gallons liquid capacity (35 gpm rating / 70 pound grease storage capacity)	Monthly ¹	DFA registered transporter
	Once every 15 days ¹	FSE staff/contractor
Any GRD with combined level of floating FOG and settle solids in any compartment > 25% liquid depth of that compartment	Immediate cleaning required	

Notes:

¹ Or as determined by City

APPENDIX A

Example FSE Wastewater Discharge Permit



Water Pollution Control
Plant
Pretreatment Program
400 East Millbrae Avenue
Millbrae, CA 94030

WASTEWATER DISCHARGE PERMIT

Permit No. ####

In accordance with the provisions of Section 8.20.520 of the Millbrae Sanitary Sewer Ordinance

Business Name
Street Address
Millbrae, CA Zip Code

is hereby authorized to discharge from the above facility to the City of Millbrae sanitary sewer system in accordance with the conditions set forth in this permit. Compliance with this permit does not relieve the permittee of its obligation to comply with any or all applicable pretreatment regulations, standards or requirements under local, State, and Federal laws, including any such regulations, standards, requirements, or laws that may become effective during the term of this permit.

PERMIT REVOCATION: Noncompliance with any term or condition of this permit shall constitute a violation of the Millbrae Sanitary Sewer Ordinance (MSSO) and permit is subject to revocation or modification.

NONTRANSFERABILITY: This non-transferable permit shall become effective midnight (Month Day, Year) and shall expire midnight (Month Day, Year).

RECORDS MAINTENANCE: A copy of this permit must be maintained on-site at all times. All related documentation must remain onsite a minimum of three (3) years.

PERMIT RENEWAL: If the permittee wishes to continue to discharge after the expiration date of this permit, an application must be filed for a renewal permit in accordance with the requirements of Section 8.20.590 of the MSSO and a minimum of **60 days prior to the expiration date**.

PERMIT FEES: Initial application and renewal fees have been waived. The City will now charge on an annual per-inspection basis.

Issued this (Day of the Week (Sun. – Sat.)), the ##th day of Month, Year.

(Authorized Signature, e.g. Name of Superintendent or Director)
(Title of Authorized Signee, e.g. Superintendent or Director)

c: files

**CITY OF MILLBRAE WATER
QUALITY CONTROL
FOOD FACILITY DISCHARGE PERMIT CONDITIONS**

PERMIT CONDITIONS ISSUED FOR: BUSINESS NAME, BUSINESS ADDRESS

Permit conditions must be complied with in order to maintain a discharge permit. Violations referred to in the provisions of these permit conditions unless otherwise stated, shall subject the permittee to suspension or revocation of permit.

1. Persons or occupants of the facility where wastewater is created or discharged shall allow the City or its representatives ready access at all reasonable times to all areas of the premises for the purpose of inspection, sampling, record examination or in the performance of any duties.
2. Permittee must not clean equipment and/or floor mats or empty mop buckets outdoors, or hose down outside areas anywhere water may flow to a street, gutter, storm drain or creek.
3. If Permittee is found to be responsible for 1) causing a plug in the City's sanitary sewer collection system or 2) found to be responsible for non-rainwater discharges to the storm sewer collection system, permittee will be required to bear the cost for repair and/or clean up by City personnel.
4. If Permittee is found to be responsible for a sanitary sewer overflow, caused by a grease blockage in the sanitary sewer collection system that results in fines imposed upon the City of Millbrae, based on reporting of the sanitary sewer overflow, Permittee will be responsible for reimbursing the City the amount imposed.
5. Permittee shall not pour oil, grease, or large quantities of oily liquids such as sauces or dressings down a sink, sanitary sewer drain, storm drain or into a dumpster; these substances shall be placed in used oil/tallow bin. Tallow bin shall be stored in approved secondary containment where applicable.
6. Permittee shall not use grease emulsifiers, enzymes, bacteria or any other additive in any physical state to aid in the eradication, breakdown, decomposition, decay, removal or transformation of grease in grease interceptors, traps or any other grease removal, reduction, elimination, ejection, expulsion or discharge device or devices. Mechanical cleaning is the only allowed means of grease removal, eradication and/or reduction.
7. Permittee shall maintain the grease trap/interceptor and tallow bin containers at their own expense, in continuous efficient and effective operation at all times and must maintain a log and/or records of how often the grease trap/interceptor is cleaned and where the contents of grease trap/interceptor were disposed of.

TRAP/INTERCEPTOR LOCATION: (Quick description of location)

In order to comply with the public notification requirement as stated by Federal Law, 40 CFR 403.8 (f)(2) (vii). Any industrial users that were in significant noncompliance with applicable pretreatment requirements at any time in the previous twelve months will be published by the City, in the largest daily newspaper in the municipality in which the Publicly Owned Treatment Works (POTW) is located. A significant violation is determined by the definition of significant noncompliance as one or more of the following:

1. Prohibited discharges of petroleum oil, non-biodegradable cutting oil or products of mineral origin in amounts that cause interference or pass through.
2. Prohibited discharges that create a fire or explosion hazard, including waste streams with a closed cup flash point of less than 140° F (60° C).
3. Prohibited discharges that result in toxic gases, fumes, or vapors in a quantity capable of causing worker health and safety problems.
4. Prohibited discharges having a temperature which inhibit biological activity in the Water Pollution Control Plant system. In no case shall wastewater be discharged with a temperature that exceeds one hundred and four degrees Fahrenheit (104° F) at the introduction into the POTW.
5. Prohibited discharges of wastes or wastewater containing any radioactive material except in compliance with applicable State and Federal regulations.
6. Failure to meet, within 90 days after the schedule date, a compliance schedule milestone contained in a local control mechanism or enforcement order for starting construction, completing construction, or attaining final compliance;
7. Failure to provide, within 45 days after the due date, required reports such as baseline monitoring reports, 90-day compliance reports, periodic self-monitoring reports, and reports on compliance with compliance schedules;
8. Failure to accurately report noncompliance;
9. Any other violation or group of violations, which may include a violation of Best Management Practices, which the POTW determines will adversely affect the operation or implementation of the local Pretreatment program.

Please note that if your facility remains in noncompliance of limitations through the city's enforcement efforts or actions, the State or EPA may also take enforcement action.