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VIA ELECTRONIC CORRESPONDENCE

June 30, 2023

CCN: 64944
File No: 8.DC.20.52

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**RE: Consent Decree (Case: No. 1:12-cv-24400-FAM),
Reference DOJ Case No. 90-5-1-1-4022/1,
Section VI, - Fats, Oils and Grease (“FOG”) Control Program Paragraph 19(a)
Sixth Annual FOG Control Program Review Report**

Dear Sir/Madam:

In accordance with the FOG Control Program approved by the United States Environmental Protection Agency (EPA) and Florida Department of Environmental Protection (FDEP) on September 7, 2017, Miami-Dade County (County) is submitting the Sixth Annual FOG Control Program Review Report.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering such information, the information submitted is, to the best of my knowledge and belief, true, accurate

and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Should you have any questions regarding this matter, please call me at (305) 372-6754.

Sincerely,

Carlos L Hernandez

for Lisa Spadafina
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Miami-Dade County FOG Control Program

6th Annual FOG Control Program Review Report

June 30, 2023

Prepared by

Division of Environmental Resources Management (DERM)

Miami-Dade County Department of Regulatory and Economic Resources

Prepared for:

United States Environmental Protection Agency and

Florida Department of Environmental Protection

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6th Annual FOG Control Program Review Report

PREPARED BY:

Division of Environmental Resources Management (DERM)

Miami-Dade County Department of Regulatory and Economic Resources

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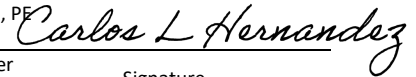
Status: Final

Document	6 th Annual FOG Control Program Review		
Ref:	Annual Report	Date:	06-30-2023
Prepared by:	Carlos L. Hernandez, PE		

Revision History

Authorized by:

Carlos L. Hernandez, PE



Revision	Revision Date	Status	Revised by:	Water & Wastewater Division	Signature
		Final	Carlos L. Hernandez, PE		

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1. Introduction

The Miami-Dade County Department of Regulatory and Economic Resources, Division of Environmental Resources Management (DERM) prepared this Annual Fats, Oils, and Grease (FOG) Control Program Review Report (Report) pursuant to Miami-Dade County's FOG Control Program (FCP) and Ordinance (FCO) approved by the United States of America Environmental Protection Agency (EPA) and Florida Department of Environmental Protection (FDEP) on September 7, 2017. The FCO was approved by the Miami-Dade County Board of County Commissioners on February 21, 2018 and became effective on March 5, 2018.

Pursuant to Paragraph 19(a)(xv) of the Consent Decree (CD), Case No. 1:12-cv-24400-FAM, DERM's FCP includes an annual review process to evaluate the effectiveness of the FCP and FCO to achieve reductions in FOG discharges to the wastewater collection, transmission, and treatment systems (WCTTSs) and thereby reduce sanitary sewer overflows (SSOs) caused by FOG. Performance Measures (PM) and Key Performance Indicators (KPIs) are utilized for this evaluation.

Over the last three years there have been several challenges to fully executing the approved FCP, with the two most prominent being COVID-19 and workforce vacancies. While many of the pandemic related limitations have been surpassed, the lingering impact of workforce vacancies remains the number one challenge. As of this reporting, field staff turnover has resulted in a workforce vacancy rate of nearly 44 percent. This equates to having nine FOG field staff out of sixteen positions filled. The current rate of turnover also stresses the ability to manage training new staff while maintaining required inspection level of service. These challenges are reflected in the feedback provided by the Town of Medley (section 3, FOG Control Program Review Committee). Given these challenges, the following adjustments have been incorporated for planning purposes:

1. 100% routine inspections will not be achieved in 2024 as previously planned.
2. To achieve 100% routine inspections of all active permitted FSEs (i.e., FSEs with an annual Grease Discharge Operating (GDO) permit) by 2025, the FCP will need to fill vacancies, reduce staff turnover, and add more positions by the end of 2024.

3. To achieve this level of staffing by 2025 will require re-assigning staff from other programs and/or creating new positions.
4. The number of additional (new) field staff required to achieve routine inspections by 2024 are estimated in Section 2.4 below.

As noted in the prior annual report, additional staffing positions were approved to better respond to SSOs, and where possible, prevent them. This additional staff for the SSO Response & Prevention Program is key for the FCP to better focus on inspecting FSEs/GDOs. A current Table of Organization (TO) is provided in **Attachment 1**. The TO identifies all new positions added.

2. Performance Measures (PMs) and Key Performance Indicators (KPIs)

The following PMs and KPIs are being utilized to evaluate the effectiveness of the FCP and FCO and, with other factors, evaluate the need to revise the FCP and/or FCO (refer to **Table 1**).

PM	KPI	Method	DERM Target
Collection System SSOs Primarily Caused by FOG		MDWASD Monthly Report/Meeting	Annual Reduction
Collection System Blockages Primarily Caused by FOG		MDWASD Monthly Report/Meeting	Annual Reduction
	Number of FOG Generators without FOG Control Device	FOG Inspections	Annual Reduction None by 2018 ⁽¹⁾
	Routine FOG Inspection Frequency	FOG Inspections	100% Annually by September 2019 ⁽²⁾
	FOG Education (Residential)	Education	Six (6) Events Annually Implementation of the program by March 5, 2020 ⁽³⁾
	FOG Stakeholder Outreach (commercial/industrial)	Outreach	Six (6) Events Annually

(1) New Date Proposed: 2024, Refer to Section 2.2.
 (2) New Date Proposed: 2024, Refer to Section 2.4.1
 (3) New Date Proposed: 2024, Refer to Section 2.4.6

Table 1. PMs & KPIs

A summary of select PMs, KPIs and other indicators are discussed below.

2.1 Collection System SSOs Primarily Caused by FOG

SSOs reported to DERM are monitored daily and logged for tracking and assessment (e.g., root cause, enforcement and moratoriums). The total number of SSOs reported by the sixteen (16) Utilities (Miami-Dade Water & Sewer Department, MDWASD + 15 Municipal Utilities) is presented in **Chart 1a**. The data presented in **Chart 1a** is primarily from MDWASD’s reporting given the size

of the MDWASD’s system relative to that of the Municipal Utilities and the experience of MDWASD’s identification and reporting capabilities acquired from prior consent decrees. DERM has been working with all Municipal Utilities to improve SSO identification and reporting capabilities and this has been discussed in Utility Round Table meetings. It is believed, based on the most recent data that Municipal Utility reporting has improved. It is therefore anticipated that as Municipal Utility reporting improves, the number of SSOs may actually increase, and that this increase may conceal actual improvements associated with the FCP. For this reason, SSOs will be presented by each utility and collectively as presented in **Chart 1b**.

Additionally, it is anticipated that several years of data will be required to establish reliable trends. That is, decreases or increases in SSOs may not reflect the impact of the FCP and FCO for a few years after March 2018, the implementation date for the new FCP/FCO.

A summary of findings for SSOs follows:

1. The total number of SSOs reported by the Utilities shows an increasing trend except for a decrease in 2018 and 2021 (refer to **Chart 1a**).
2. The total number of SSOs caused by FOG was showing a decreasing trend but rose significantly in 2019 (refer to **Chart 1a**) and fluctuated thereafter.
3. SSOs by Utilities in 2022 are shown in **Chart 1b**.

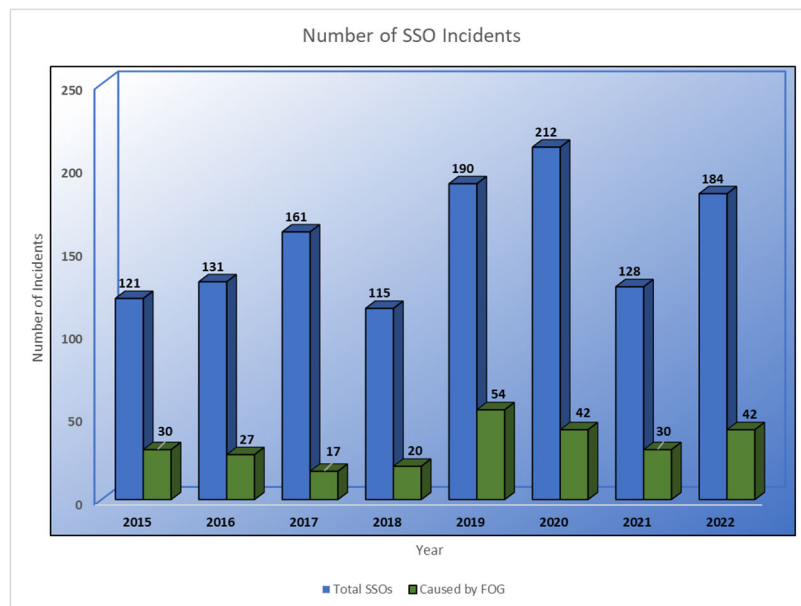


Chart 1a: 2022 Sanitary Sewer Overflows for All Utilities

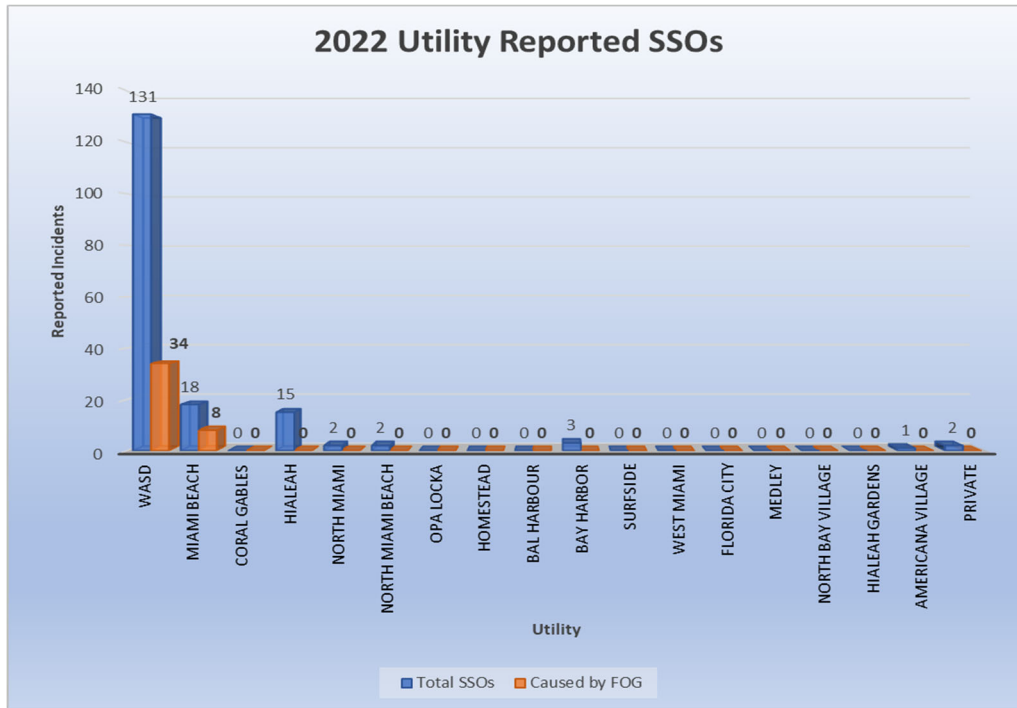


Chart 1b: 2022 Sanitary Sewer Overflows Reported by Utility

The FCP strategies to reduce FOG related SSOs included front-end (e.g., design standards, more efficient interceptors, and eManifest) and back-end (e.g., Accelerated Maintenance reporting, Hot Spot reporting) process improvements continue to be a key area for prevention of SSOs.

As reported in the 2nd Annual FOG Control Program Review Report, MDWASD had integrated a real-time level monitoring system (e.g., SmartLevel™/SmartCover) to minimize Hot Spot SSOs. By incorporating two-way communication devices at key manholes, MDWASD can deploy field teams to prevent an SSO based on preset wastewater level alerts and warnings (i.e., wastewater level above invert measured from the bottom of the manhole cover). MDWASD defines a Hot Spot as a location with three (3) or more SSOs in a period of two (2) years. MDWASD continues to use this system to minimize SSOs.

Municipal Utilities are notifying DERM of Hot Spots utilizing the Hot Spot Reports, FOG complaints (areas of concern), and monthly Accelerated Maintenance Reports. The Municipal Utilities submit a Hot Spot report to DERM on a monthly basis. Currently, the DERM FOG Inspection Group supervisor reviews complaints and prioritizes inspections accordingly. A sample Accelerated

Maintenance report is included in **Attachment 2**. Accelerated Maintenance reports provide the monthly costs by the Utility for maintenance of FOG Hot Spots, and incidents due to FOG. The total monthly and annual costs by Utilities are included in **Chart 1c** and **Chart 1d** below.

During this last year DERM implemented a Pilot Program that added 192 SmartCover units (as the ones used by WASD) in sanitary sewer systems within Miami-Dade stormwater basins six and seven. These remote monitoring units are continually alerting sewer utilities of any variation in sewer levels within their systems, caused by different sources, including FOG. This pilot program is proving to be successful and SSOs have already been prevented thanks to this real-time level monitoring system. Notwithstanding the improvements made, additional focus is required to reduce SSOs. To this end, DERM has expanded the SSO Response and Prevention Program by adding field and engineering staff positions.



Chart 1c: Total Utility Cost by Month for Maintenance of FOG-related incidents

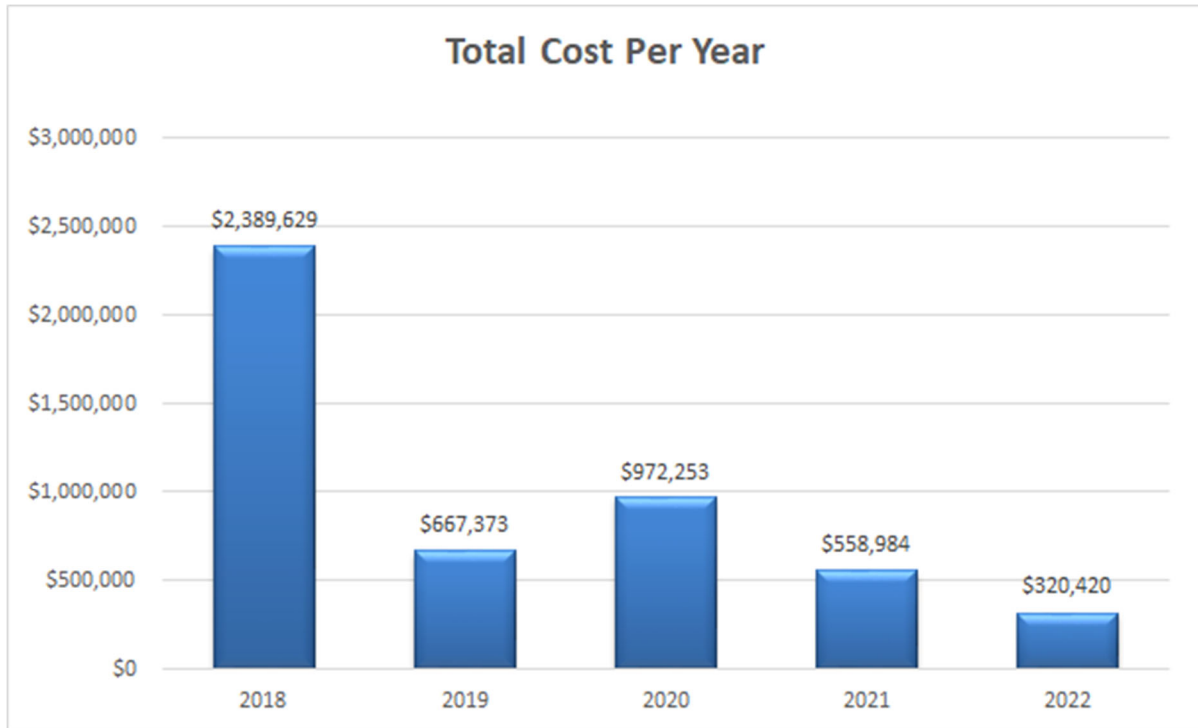


Chart 1d: Total Utility Cost by Year for Maintenance of FOG-related incidents

2.2 Number of FOG Generators without a FOG Control Device

With the implementation of the new FCP, a key goal has been the reduction in the number of FSEs operating without a grease interceptor (No Grease Interceptor, NGI). Inspection efforts have focused on bringing these sites into compliance. The goal is to have zero (0) NGI sites.

The total number of NGI FSEs have decreased from **695** in 2015, to **25** (refer to **Chart 2**). This reduction is the result of a coordinated effort involving a significant number of resources working on compliance assistance, technical support, and enforcement. DERM will continue to focus resources to accomplishing the goal of zero (0) NGI FSEs by 2024. Additionally, the County recently increased the cost of uniform civil violation notices (i.e., tickets) which can further encourage compliance.

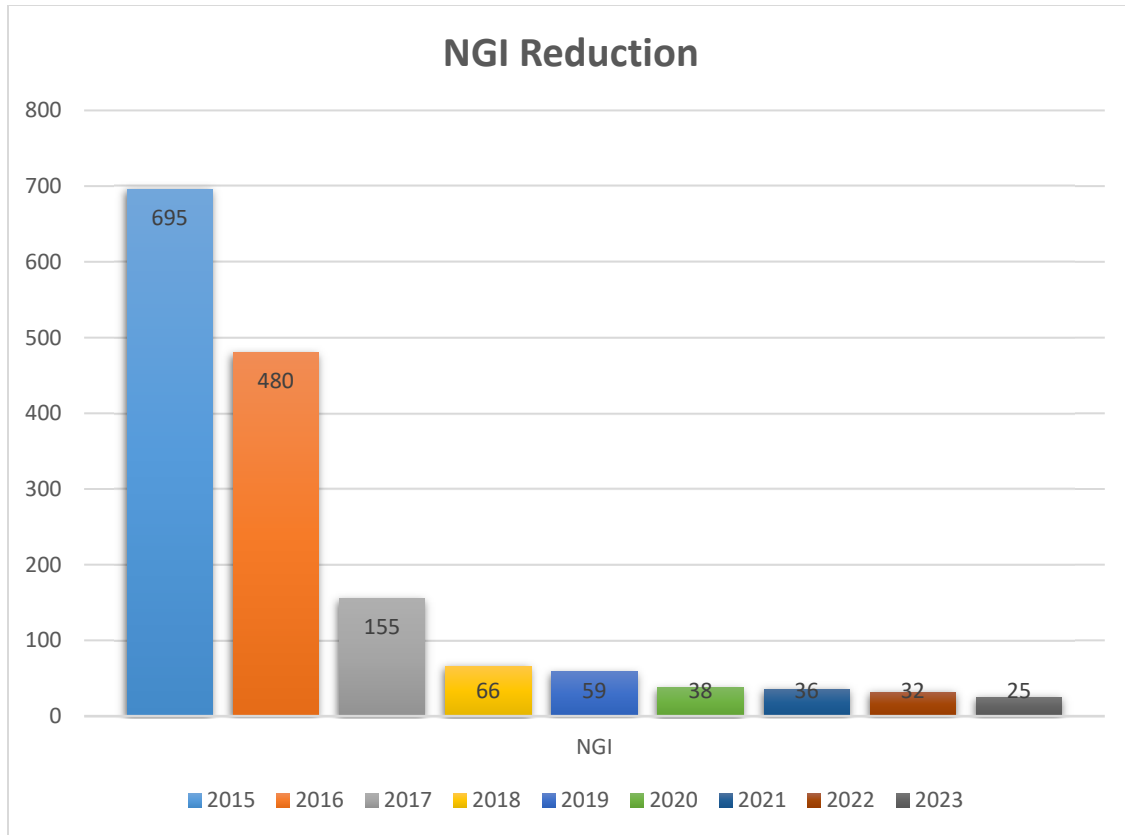


Chart 2: Food Service Establishments without a Grease Interceptor

2.3 Number of Breached FOG Control Devices

Starting with the third annual report, a new category was added: *Number of Breached FOG Control Devices*. It is anticipated that the number of NGIs will become zero and therefore a replacement category was selected that represents a significant concern and equally important to track in this report. A breached FOG Control Device is one that is damaged and/or defective so that it allows wastewater, FOG or food waste to seep, flow, or discharge into the ground, groundwater, surface waters or any other location not approved by the Director or Director’s designee. Corrosion is a common root cause for breached devices and therefore unprotected concrete tanks are the most common type of breached device.

As the focus shifts to routine annual inspection in 2024-2025, a more accurate count of breached tanks will be available.

The current count of breached grease interceptors is 90, though this number can change daily. When a breached tank is identified, a field notice is issued to affect a temporary repair within seven days and fully replace the system within 90 days.

Future reports will provide totals by year in a chart form and summarize enforcement efforts and outcomes.

2.4 FOG Program Workforce Analysis

Staffing resources (workforce) and workload were evaluated to assess future staffing needs. Workload was analyzed by specific task/assignments and modified accounting the new staff that joined the Division after 2021.

- Routine Inspections
- Hot Spots & Complaints Inspections [by new 2022 Staff]
- Construction Inspections
- Confirmation Inspections
- FOG Disposal Facility Inspections
- Residential Areas Inspections
- eManifest Inspections
- Private Pump Station Inspections (~ 1,500) [by new 2022 Staff]
- Public Pump Station Inspections (~1,600) [by new 2022 Staff]

A significant change from prior years is the anticipated new staffing to support additional tasks to inspect and monitor private and public pump stations. This effort became significant when the COVID-19 Pandemic made it difficult to inspect FSEs. A shift to pump station inspections resulted from social-distancing requirements and concerns that pump station failures could further complicate public health concerns. Moreover, the accumulation of FOG in a wet well is a clear sign of poor FOG control, whether it be from commercial establishments (e.g., restaurants) or residences. Based on the success of this initiative, pump station inspections have been made a permanent task in the FCP through the end of 2021 and part of the SSO Response and Prevention Programs starting in 2022. The latter allowed staff to initiate routine annual FSE inspections in 2022.

A comparison of staffing levels, past, present and future, is shown below in **Table 2**.

Staff Position	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	Change
Division Chief	1	1	1	1	1	1	1	1	1	1	No change
Program Manager	1	0	0	0	1	1	1	1	1	1	Position was moved in 2019 to temporarily address immediate needs in development programs. Replacing position is proposed ⁽¹⁾
Supervisor	2	2	2	2	2	2	3	3	3	3	Increase proposed ⁽¹⁾
FOG Inspection Staff	12	12	14 ⁽²⁾	14 ⁽²⁾	16 ⁽³⁾	16 ⁽³⁾	25	25	25	25	Increase proposed ⁽¹⁾
<i>Gray used to depict estimated future values.</i> (1) Additional positions are proposed to address programmatic initiatives (2) Positions added to assist with pump station inspections. (3) Excludes Public & Private Pump Station Inspections and Hot Spot Inspections to be performed by SSO Response & Prevention Program Staff in 2022 and beyond.											

Table 2: Prior, Current & Future Staffing

Workload data (by inspection category/assignments) for previous years was reviewed and analyzed to estimate full time equivalent workforce requirements. A discussion of each inspection category, tabulated summary, and assumptions (**Tables 3** and **4**) follows below.

Performance Measures for a Working Year		
Total Time Before Deductions:	52 weeks/ per year	260 working days/per year
Type of Deduction	Weeks	Days
Holidays	3.4	17
Car Maintenance	0.2	1
County Physical	0.2	1
Annual Leave	2.8	14
Sick Leave	2.4	12
Training and Meetings	2.8	14
Total Time Deducted:	11.8	59
Total Working Time Remaining:	40.2	201
201 Working Days x 4 Inspections per day = 804 inspections per year		
Reinspection Ratio = 2.25/1		
Number of GDOs Inspected per year/FTE = 357		

Table 3: Basis for Staffing Calculations

				YEAR -->	2021	2022	2023	2024	2025
Routines GDO Inspections -->					7,578	7,644	7,743	7,842	7,941
Construction -->					860	869	877	886	895
Collection System -->					500	500	500	500	500
Pump Stations -->					3,100	3,131	3,162	3,194	3,226
Status/Closed Confirmation -->					500	500	500	500	500
FOG Disposal -->					62	62	62	62	62
eManifest -->					500	500	500	500	500
Plan Review & CU/OL/BTR -->					11,237	11,462	11,691	11,925	12,163
Inspection Category	DERM TEAM	Classifications	Task/FTE/Year	2021	2022	2023	2024	2025	
Routine	FOG	Inspector	360	21	21	22	22	22	
Construction		Inspector	300	3	3	3	3	3	
Collection System: Hot Spots, Residential, Complaints	SSO R&P Program	Inspector	250	2	2	2	2	2	
Public & Private Pump Stations		Inspector	800	4	4	4	4	4	
Status/Closed Confirmation	Permitting	Inspector	500	1	1	1	1	1	
FOG Disposal		Inspector	200	0	0	0	0	0	
eManifest		Inspector	400	1	1	1	1	1	
Plan Review/CU/OL/BTR	FOG	Engineering	2500	4	5	5	5	5	
Inspector:				Broad group that includes staff trained to perform field inspections. May include multiple classifications that may change based on program-specific requirements.					

Table 4. Staffing FTEs

2.4.1 Routine Inspections

The FCP included performing routine inspections of facilities with Grease Discharge Operating (GDO) permits starting after *September 30, 2019*. The total number of GDO sites decreased at the start of the pandemic but has been increasing yearly thereafter (refer to **Chart 3**).

Based on ongoing inspection efforts, the duration for an average routine inspection (factoring mobilization, transportation, inspection, and report preparation), and the number of re-inspections required, the number of full time equivalent (FTE) inspectors was recalculated. Refer to **Tables 2, 3 and 4**. As discussed in Section 1.0, Introduction, to achieve routine inspections of all active GDOs by 2024 will require additional staff. Based on current approved positions, a total of approximately nine (9) FTE additional inspection positions and one supervisor will be required. This will require re-assigning staff from other programs and/or adding new positions by 2023.

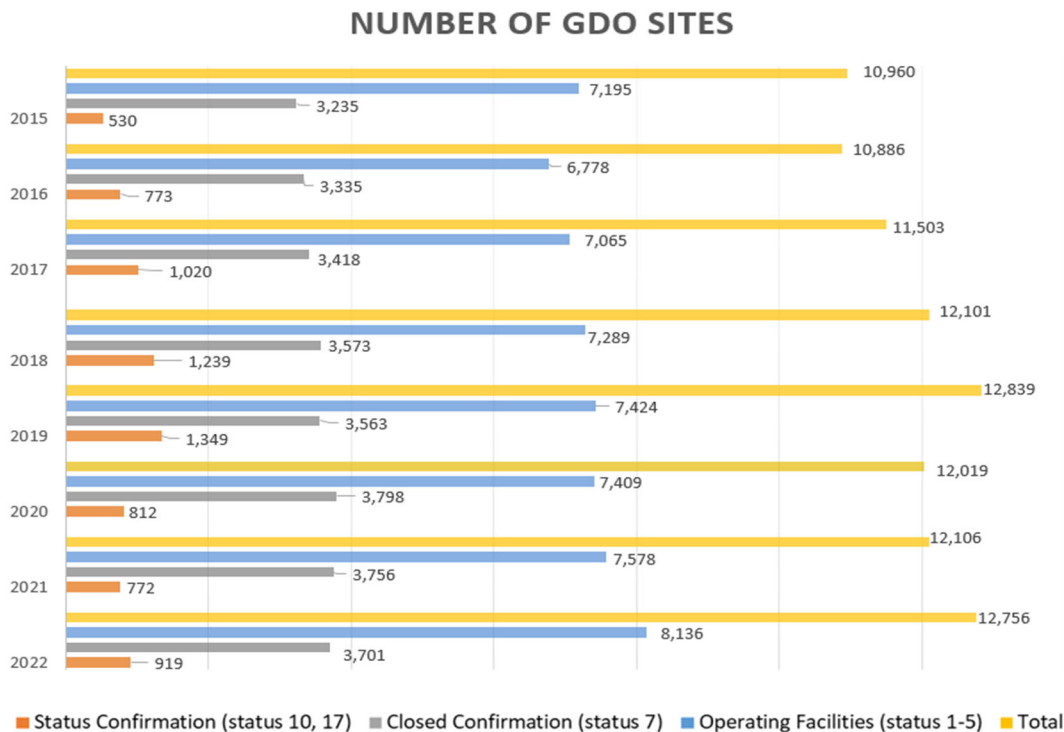


Chart 3: Number of Grease Discharge Operating Permits

2.4.2 Hot Spots & Complaints Inspections

Hot Spots inspections result from request from the Utilities to determine possible facilities causing FOG discharges in specific areas. Complaint inspections are conducted based on private and municipal complaints.

DERM has successfully implemented the use of real-time level monitoring systems (SmartCover). A pilot program is currently ongoing. As part of this pilot program, 192 SmartCover units have been installed on sanitary sewer manholes located within the Miami-Dade County storm water basins six and seven. This pilot program is proving to be a success, since its implementation, DERM and sewer utilities have been alerted by the monitoring units when levels increase in the sanitary sewers, and several SSOs have already been prevented. DERM's team continually receives notifications from the SmartCover units, and fluid communication has been established with the sewer utilities where the units have been installed. Information provided by sensors allows us and the utilities to identify sections of the system prone to blockages (FOG and rags), inflow, and even illegal discharges into the system.

As noted in the **Introduction** and in **Table 4** above, it is anticipated that the Hot Spots inspections will be performed by the SSO Response & Prevention Program in close coordination with the FOG Program supervisors and new Program Manager. Current staff turnover (several positions have not been able to be filled and others have become vacancies during the last year) has become a challenge to the department.

2.4.3 Construction Inspections

Starting March 2018, with the approval of the FCO, DERM began performing construction inspections to confirm compliance with approved plans. These inspections have proven to be invaluable in that they provide an opportunity to identify and correct problems during the construction phase and prior to final inspection and issuance of a Certificate of Occupancy (or Completion) being issued by the Municipal Building Department. Correcting problems after a CO or CC has been granted becomes extremely difficult, in part because a contractor has typically been paid in full and has demobilized from the site. A summary of inspections performed is presented below in **Chart 4**. The program has sufficient approved positions based on current assumptions.

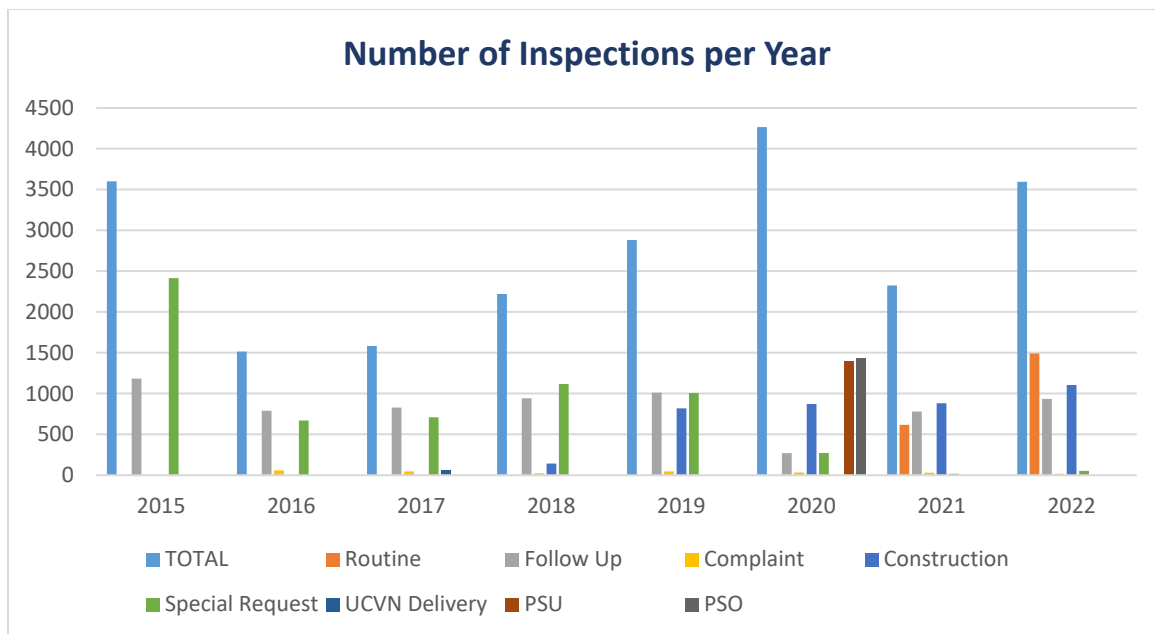


Chart 4: Number of Inspections per Year

2.4.4 Confirmation Inspections

The total number of facilities operating without a GDO permit or closed (**Chart 3**) is approximately 2,146 (this includes expired permits and facilities currently operating without a permit, that have been notified of permit requirement). As routine annual inspections continue to be performed, these estimates will be re-evaluated, and actions taken accordingly. Furthermore, the GDO Permitting group will continue to perform sweeps of previously permitted facilities and GDOs that have not renewed their annual operating permit to address this category of facilities. This program has sufficient staff based on current assumptions.

2.4.5 FOG Disposal Facility Inspections

To prevent/minimize comingling of FOG with septage, educate liquid waste haulers in the use of appropriate eManifest forms, and to improve the disposal process at the wastewater treatment plant, inspections of liquid waste haulers at the South District Wastewater Treatment Plant (SDWWTP) Hauled Waste Disposal facility were initiated prior to 2018. However, due to the COVID-19 Pandemic, these inspections ceased in 2019. Inspections are currently performed by the DERM Liquid Waste program. The program has sufficient staff based on current assumptions.

2.4.6 Residential Areas Inspections

Some blockages caused by FOG reported by the utilities are in residential areas. DERM intended to initiate residential outreach in 2020 but due to the COVID-19 Pandemic this effort was postponed. This function is anticipated to start in 2023 by the SSO Response and Prevention Program and will include a limited number of real-time level monitoring systems. The program has sufficient staff based on current assumptions.

2.4.7 eManifest Inspections

Liquid waste haulers and GDO facilities are required to submit information to DERM using the eManifest system. The system generates reports of potential violations that require review and inspection. Additionally, random sampling performed by MDWASD of hauled waste, in part as a deterrent to inappropriate waste disposal, requires follow up to determine the source location of waste material that exceeds local limits. These may include facilities served by septic system and industrial facilities.

This program will be integrated into the DERM Liquid Waste program by 2023. Program staff will run monthly reports to identify potential violations and report findings to the appropriate program for inspection and follow-up. The program has sufficient staff based on current assumptions.

2.5 FOG Construction Plans and Certificate of Use Reviews

An indicator of future increases (or declines) in the total number of GDO facilities is the number of construction plans and certificate of use submittals. Construction plan submittals continue to increase as shown in **Chart 5** below. The certificate of use applications shows a more significant increase for 2022 (**Chart 6**). A combined chart depicting all engineering reviews is included as **Chart 7**. The significant increase in reviews may be a function of the improved coordination and shift to an electronic review process making it less likely that a Municipality would skip the DERM (FOG) review process. How this increased activity will manifest itself in GDO permits is unknown. However, the overall increase in reviews suggests that the number of permitted facilities (GDOs) will continue to expand.

Engineering review staff for this program remains at four reviewers since 2020, and based on the current and projected workload, this program requires one additional engineering position.



Chart 5: Total FOG Plan Reviews

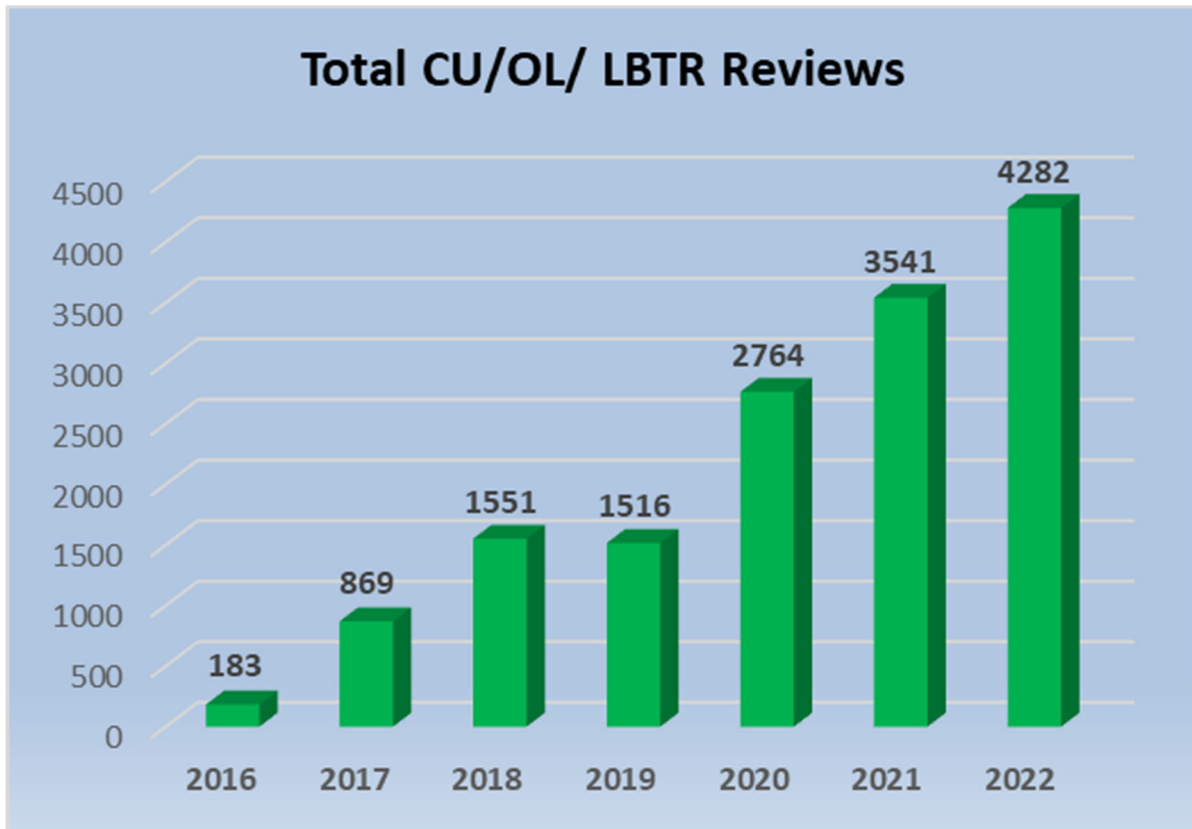


Chart 6: Occupational License, Certificate of Use Reviews

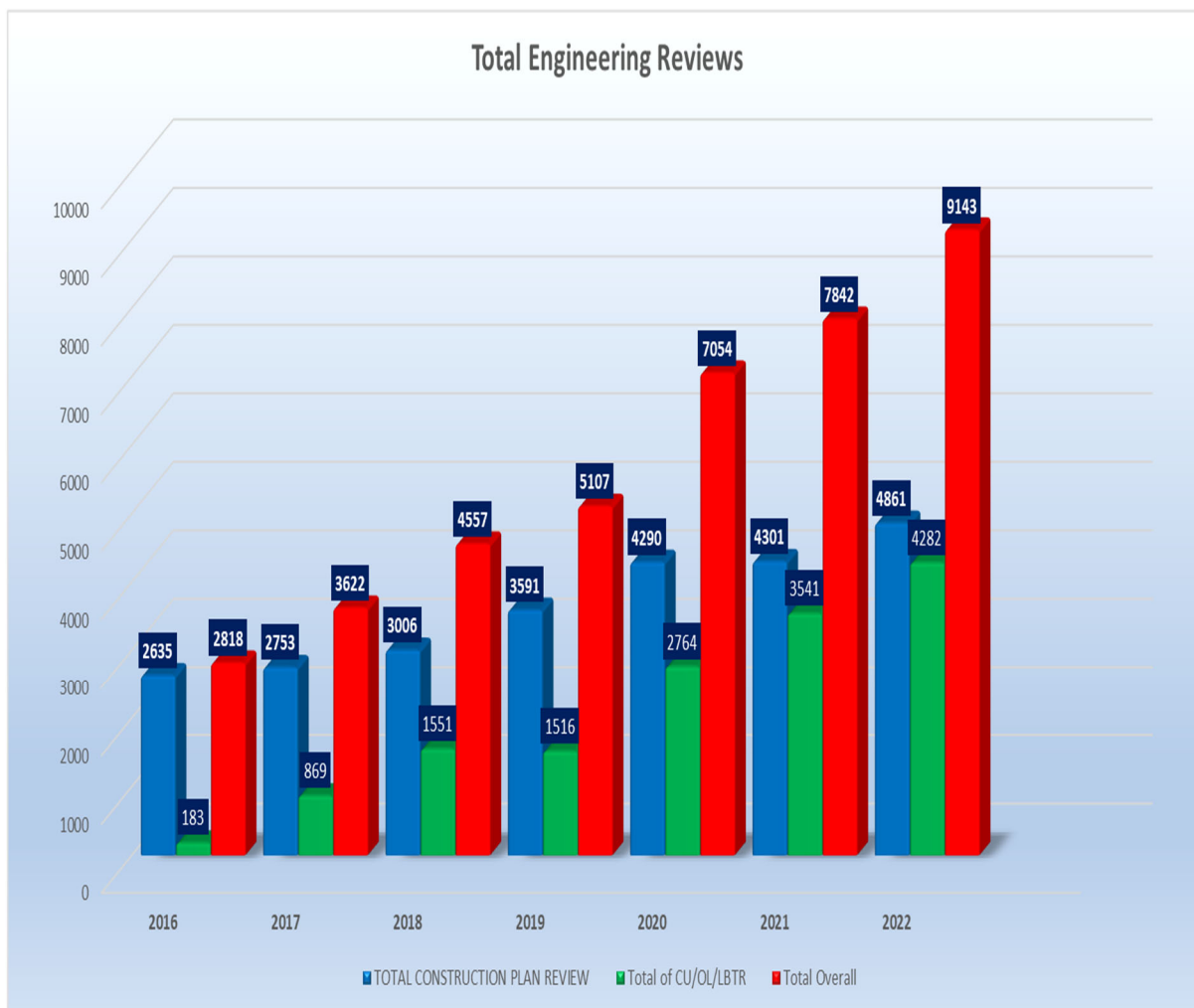


Chart 7: Total Engineering Reviews

2.6 FOG Outreach and Education Events

DERM has focused on FOG outreach and education since 2014 and has exceeded the FCP target of six (6) stakeholder outreach events per year (refer to **Table 5**) through 2022. The effects of the COVID-19 Pandemic finally curtailed outreach events in 2021. This is temporary and it is expected that outreach will pick up in the coming years.

As proposed in the FCP, DERM planned to expand the current MDWASD residential FOG outreach program by March 2020. The expansion was to include an educational campaign to address blockages caused by the combination of “flushable wipes” and FOG, which was one of the concerns expressed by the Utilities during the FOG Annual Review meeting held on June 18,

2019. Due to the COVID-19 Pandemic, this was not realized. It is anticipated that this effort will be reprogrammed for 2023.

YEAR	NON-RESIDENTIAL	RESIDENTIAL OUTREACH	TOTAL NUMBER
2014	15	0	15
2015	20	0	20
2016	16	2	18
2017	12	0	12
2018	19	0	19
2019	17	2	19
2020	12	0	12
2021	16	0	16
2022	20	3	23

Table 5: Outreach Events

3. FOG Control Program Review Committee

The effectiveness of the FCP and FCO are continuously evaluated at the DERM Division Level (i.e., DERM Water and Wastewater Division). An annual review of the FCP effectiveness is performed by the FOG Control Program Review Committee (committee). The committee is composed of five members, each from one of the following Departments/Sections:

- DERM Water and Wastewater Division (formerly the Wastewater Permitting Section)
- DERM Director or Director’s Designee
- RER Administration
- Miami-Dade County Water and Sewer Department, Wastewater Collection and Transmission Line Division
- Volume Sewer Customers (Municipal Utility)

For 2022, input from stakeholders was requested from utilities. The Town of Medley provided feedback regarding the FOG Program on June 6, 2023. The correspondence from the Town of medley is included in **Attachment 3** and their responses to the questionnaire are included below:

1. What is your # 1 FOG Concern?

Response: FOG generators discharging excessive amounts of FOG into the Utility Sanitary Sewer System, causing hardship and damage to the sewer appurtenances, such as the utility major pump stations pumps, sewer mainlines, manholes and force mains.

2. If you can change one thing, what would it be?

Response: Adopt stronger enforcement measures, such as more potent Civil Violation penalties, to bring Non-Compliance FOG generators into compliance expeditiously, especially when the FOG generators are required to upgrade the onsite FOG control Device(s) or replace grease interceptor system(s) due to breaching.

3. Are the PM/KPI good indicators?

Response: Yes, the PM/KPI are good indicators. However, since the annual FOG Inspections are not being achieved, this in the long run can cause the FOG control program to be attenuated.

4. Should we add new PM/KPI?

Response: No Comment

5. Other Comments?

Response: The FOG Control can be more stringent/effective if the Department hires more FOG Team Supervisors, FOG Pollution Control Inspectors 1 and FOG Environmental Technicians 2. Having more personnel (Manpower) can produce more site visits/inspections. The presents of having FOG Control Authoritative figures out in the field, will cause FOG generators to ponder before discharging FOG into the sanitary system and keep the FOG generators in compliance with DERM requirements.

DERM concurs with the Town of Medley's recommendations and will work on filling vacancies as well as increasing staff as included in the FOG Program Workforce Analysis (Section 2.4) of this report.

4. Proposed FCO and FCP Revisions

The FCO became effective in March 2018 and no changes are currently proposed. DERM will continue to monitor all areas of the FCO (e.g., design standards, plan review, construction inspections, operating permits, etc.) routinely to ascertain if any changes are required. Prior to making any changes to the FCO, which would require Board of County Commissioner approval, an Ordinance Revision Plan (ORP) will be submitted to FDEP and EPA for review and approval. The ORP would include, at a minimum, the regulatory and technical basis for the proposed changes and implementation schedule (e.g., public outreach, public comment, legislative timeframes, and code implementation timeline with change applicability and grandfathering criteria).

Based on working knowledge gained by implementing the FCP, the key focus for the program is to be fully staffed by 2025 to accomplish all FCP requirements.

DERM's inspection protocol for 2019 to 2021 included focusing primarily on Hot Spots and Complaints and starting to transition more staff resources to routine inspections. The goal of initiating annual inspections was initiated in October 2021. Given the level of effort required to address Hot Spots and Complaints, expanding SDWWTP inspections, eManifest enforcement/inspections, construction inspections/re-inspections, and the staff shortages caused by the COVID-19 Pandemic, shifting resources to annual inspections in 2021 was not fully realized. Moreover, based on the projected workload for all inspection categories, additional staffing is required to meet all inspection goals for 2025 and beyond. It is anticipated that additional staffing will be available and added by 2024-2025.

5. Conclusions

DERM implemented the FCP to reduce FOG discharges to the WCTTS and thereby reduce FOG related SSOs. While the FCP and FCO were approved in 2018, DERM has made great progress improving key functions: Design/Review, Compliance/Construction Inspections, FOG Manifesting (i.e., eManifest) and Outreach.

DERM will continue to make progress implementing the FCP and enforcing the FCO, and when applicable, propose changes to the EPA and FDEP.

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ATTACHMENT 1

Table of Organization

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As of June 28, 2023

WATER AND WASTEWATER DIVISION	
Carlos Hernandez	Division Chief
Vacant (Melanie Alonso)	Administrative Secretary
Galo Pacheco	Senior Professional Engineer
Star Anorga	Secretary
Betsy Olmino	Engineer 2

Water Distribution & Wastewater Collection & Transmission Systems [Construction Permitting]	
Rosa Areas	Engineer 3
Victor Cabrera	Engineer 2
Gabriela David	Engineer 2
Hala Mirza	Engineer 2
Alejandra Villanueva	RER P&P Representative
Frank Lezcano	Engineer 3
Francisco Calleja	Engineer 2
Yaimara Manero	Engineer 2
Bruce Coward	Engineer 2
Roxana Henriquez (PRD)	RER P&P Representative

Water Distribution & Wastewater Collection & Transmission Systems [Engineering, Reporting, Operation, Monitoring and Compliance]	
Oscar Aguirre	Engineer 3
Pablo Asencio	Engineer 2
Karina Lopez	Engineer 2
Vacant (Temesgen Gebrekidan)	Engineer 2
Gloria Suarez	Engineer 2
00027039 (S>S)	Engineer 2
Daira Marrero	P.C. Inspector 2
Vacant (Jackelyn Alberdi)	P.C. Inspector 1
Tracy Jaquet	P.C. Inspector 1
Matthew Lopez	P.C. Inspector 1
Elveste Sistra	Env. Tech. 2
Vacant (Jorge del Risco)	Env. Tech. 2
Gerod Holliman	Env. Tech. 2
Vacant (Debbie Barahona)	Env. Tech. 2

Water & Wastewater Treatment Systems [Engineering, Reporting, Operation, Monitoring and Compliance]	
Richard Rojas	Engineer 3
Carlos Lincheta	Engineer 2
Frank Agras	Engineer 2
Nadia Ramnanan	Engineer 2
Carlos Icaza	Engineer 2
Jesus Hernandez	Engineer 2
Jhon Garcia Valencia	Engineer 1
Vacant (Carlos Icaza)	Engineer 1
Vacant (Victor Cabrera)	Engineer 1
Isabel Gonzalez	Engineer 1
Laura Castillo	Env. Spec. Supervisor
Jorge Perez	P.C. Inspector 1
Jorge del Risco	P.C. Inspector 1
Erika Perez	Env. Tech. 2
Vacant (Ana Rodriguez)	Env. Tech. 2
Craig Bethel	Env. Tech. 2
Tracy Niclasse	Env. Tech. 2
Vacant (Amari Oni Orisan)	Env. Tech. 2
Vacant (Nakera Pruitt)	Env. Tech. 2
Jada Lee	Env. Spec. Supervisor
Vanessa Clayton	P.C. Inspector 1
Vacant (Cassandra Penuela)	P.C. Inspector 1
Cedric McQueen	Env. Tech. 2
Nicholas Padgett	Env. Tech. 2
Vacant (Brittany Mahon)	Env. Tech. 2
Charles Bryant	Env. Tech. 2
Vacant (Ricky Santos)	Env. Tech. 2
Vacant (Edwin Mozo)	Env. Tech. 2
Tadeo Monterrubio	Env. Spec. Supervisor
Daniela Daniele	P.C. Inspector 1
Anthony Cuba	P.C. Inspector 1
Vacant (Ana Rodriguez)	P.C. Inspector 1

TALLY:
 Total: 61
 Vacancies: 15
 Overages: 1
 Filled: 45

LEGEND:
 Overages in RED:
 (SSORPP) Sanitary Sewer Overflow Response, Prediction and Prevention Program
 (S>S) Septic to Sewer Program
 Vacancies in GREEN:
 (vacated by)
 New Hires

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ATTACHMENT 2

Sample of Utility Accelerated FOG Maintenance (aFOG) Report

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**Accelerated FOG Maintenance (aFOG)^{*1} Report
MDC Code Section 24-42.6(13)**

Utility Name: City of Miami Beach
Month Reported: 04/01/22
Completed by: Kristina Nunez

Utility Code	Date of Maintenance mm/dd/yyyy	Maintenance Location (address)	ZIP code	X, Coordinate (Feet)	Y, Coordinate (Feet)	Causes ^{*2}	Maintenance Initial MH #	Maintenance Final MH #	Length of Pipe Cleaned (Feet)	Description of Maintenance Performed ^{*3}	List of complete name of Chemicals added	Volume Recovered for Disposal (gallons) ^{*4}	Liquid Waste Transporter DERM Permit LW-ST #	Disposal Ticket No. ^{*5}	Maintenance Cost ^{*6} Labor	Maintenance Cost ^{*6} Equipment	Maintenance Cost ^{*6} Materials/Supplies	Total Maintenance Cost	Event Id (DERM use only)
2	04/10/22	8530 BYRON AVE	33141	80.124071	25.870394	FOG	SWR31050	SWR30726	700	Hydro Jetting		700	372	392181	\$ 395.52	\$ 340.40		\$ 735.92	2446618530 BYRON AVE

^{*1} Cleaning performed by utilities to prevent sanitary sewer overflows caused by FOG blockages in sanitary sewer systems, including but not limited to laterals, gravity mains, pump stations, and air release valves

^{*2} Causes
 FOG
 FOG & Rags (FROG)
 FOG & Roots
 Other

^{*3} Description of accelerated FOG maintenance performed :
 Hydro Jetting
 Pipe replaced due to grease solidified
 Chemicals added
 Other

^{*4} Quantities of waste removed, recovered, collected or treated to prevent a sanitary sewer overflow
^{*5} Disposal Ticket No., Must be reported from the Manifest form used to bring the waste to the disposal facility (Treatment plant). See sample form in the next TAB "Sample Disposal Manifest Form"
^{*6} Cost of accelerated FOG maintenance including labor, equipment, and materials. Labor shall include field and office staff

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ATTACHMENT 3

Town of Medley Feedback Regarding the FOG Control Program

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"The perfect place for industrial development"

Miami-Dade County FOG Control Annual Review

6/7/2023

Subject: Town of Medley Providing Input/Feedback regarding the effectiveness of the FOG Control Program.

Background:

DERM Water & Wastewater Division, the Town of Medley and the Town's consulting engineers, Snubbs, have conducted Fats Oils and Grease (FOG) field inspections in the Town of Medley since April 2019. The inspections took place at certain properties located within basins 200, 300, FEC-1, FEC-2 and 100. These properties were inspected for possibly contributing FOG into the Town's sanitary sewer system. Since then, the Town and DERM have been working closely in continuing the improvements of the joint efforts and the FOG control program throughout the Town.

The Town would like to participate in Miami-Dade County FOG Control Annual Review and provide Input/feedback on the effectiveness of the FOG Control Program. Participation is based on providing responses to the questionnaires below.

Questionnaires:

1. What is your # 1 FOG Concern?

Response: FOG generators discharging excessive amounts of FOG into the Utility Sanitary Sewer System, causing hardship and damage to the sewer appurtenances, such as the utility major pump stations pumps, sewer mainlines, manholes and force mains.

2. If you can change one thing, what would it be?

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4. Should we add new PM/KPI?

Response: No Comment

5. Other Comments?

Response: The FOG Control can be more stringent/effective if the Department hires more FOG Team Supervisors, FOG Pollution Control Inspectors 1 and FOG Environmental Technicians 2. Having more personnel (Manpower) can produce more site visits/inspections. The presents of having FOG Control Authoritative figures out in the field, will cause FOG generators to ponder before discharging FOG into the sanitary system and keep the FOG generators in compliance with DERM requirements.