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VIA ELECTRONIC CORRESPONDENCE

June 28, 2024

CCN: 65446
File No: 8.DC.20.52

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Environment and Natural Resources Division
U.S. Department of Justice
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RE: DOJ No. 90-5-1-1-4022/1
Tom.Mariani@usdoj.gov

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West Palm Beach, FL 33406
Attn: Compliance/Enforcement Section
Sirena.Davila@dep.state.fl.us

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)
Seventh 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 Seventh 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,

Lisa Spadafina
RER Assistant Director, Division of Environmental Resources Management

ec:

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Galo Pacheco (RER-DERM)
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Miami-Dade County FOG Control Program

7th Annual FOG Control Program Review Report

June 28, 2024

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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7th Annual FOG Control Program Review Report

PREPARED BY:

Division of Environmental Resources Management (DERM)

Miami-Dade County Department of Regulatory and Economic Resources

Status: Final

Document	7th Annual FOG Control Program Review		
Ref:	Annual Report	Date:	06-28-2024
Prepared by:	Galo Pacheco, PE		

Revision History

Authorized by:

Galo Pacheco, P.E. — Galo Pacheco

Water & Wastewater Division — Signature

Revision	Revision Date	Status	Revised by:
		Final	Galo Pacheco, PE

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Charts

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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.

The FOG compliance workgroup has been challenged due to staffing issues created by turnover of compliance staff. Currently, the workgroup has 16 positions allocated and 12 of those are filled. With respect to the 2025 FOG compliance work plan, the following has been assumed.

1. Routine inspections will continue to occur depending on staff availability.
2. To achieve routine inspections by 2025, the FCP will need to be fully staffed to perform routine inspections of all active permitted FSEs (i.e., FSEs with an annual Grease Discharge Operating (GDO) permit) by the end of 2024.
3. To achieve this level of staffing by 2025 will require re-assigning staff from other programs and/or adding new positions.
4. The number of additional (new) field staff required to achieve routine inspections by 2025 is estimated in Section 2.4 below.

As noted in the two previous annual reports, additional staffing positions were approved to better respond to SSOs, and where possible, prevent them. This additional staff for the SSO Response. Prediction & Prevention Program (SSORPP) is key for the FCP to better focus on inspecting FSEs/GDOs. Also, during the second quarter of 2024, a new Compliance Section Manager position was created within the Water and Wastewater Division of DERM to oversee all field

activities including the FOG and SSORPP inspection programs. A current Table of Organization (TO), as of June 2024, 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: 2025 Refer to Section 2.2.
(2) New Date Proposed: 2025, Refer to Section 2.4.1
(3) New Date Proposed: 2025, 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 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 showed a decreasing trend from 2015 to 2018 but it rose significantly in 2019. After that, it decreased until 2021, but during the last two years it has shown an increasing trend; with a maximum historical recorded number of 58 incidents in 2023. (refer to ***Chart 1a***).

3. The total number of SSOs reported by Utilities in 2023 is shown in ***Chart 1b***.

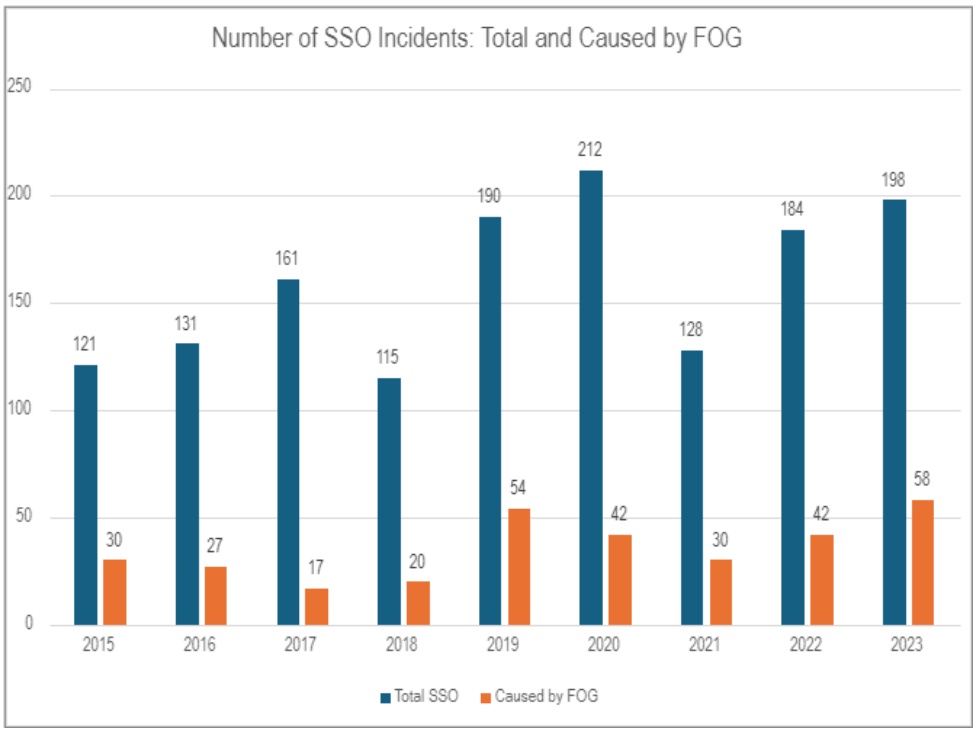

Chart 1a: 2023 Sanitary Sewer Overflows for All Utilities

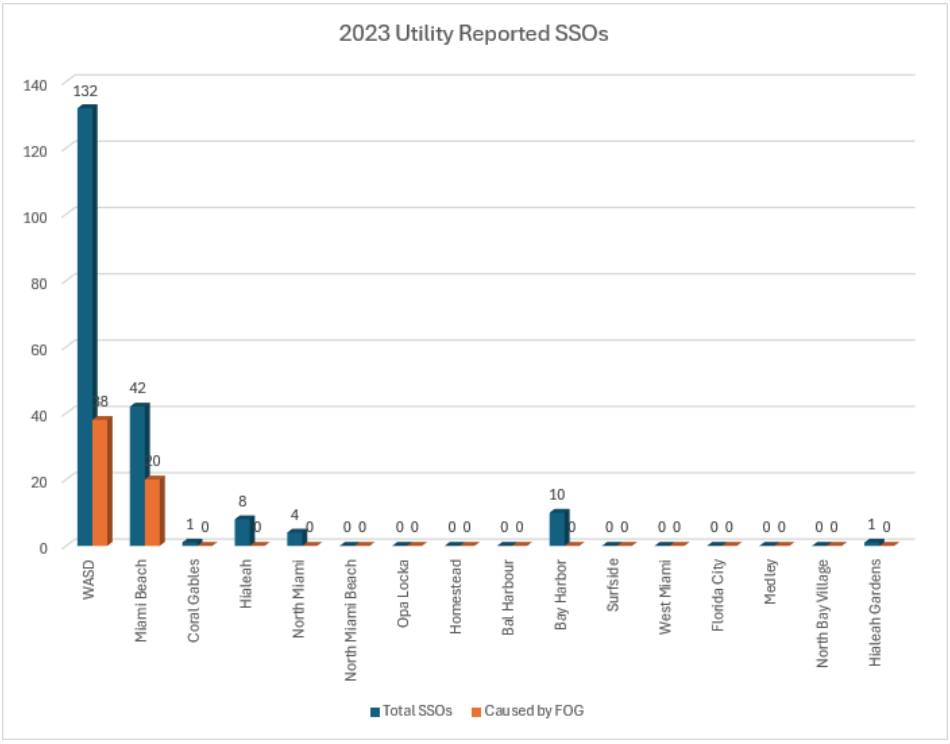

Chart 1b: 2023 Sanitary Sewer Overflows Reported by Utility

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 the prevention of SSOs.

As previously reported, MDWASD had integrated a real-time level monitoring system (e.g., SmartLevelTM/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 required to notify DERM of Hot Spots utilizing the Hot Spot Reports, FOG complaints (areas of concern), and monthly Accelerated Maintenance Reports. Some utilities did not consistently submit these reports during the year 2023. DERM will initiate enforcement to non-reporting utilities.

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.

Two years ago, DERM implemented a Pilot Program that added 192 SmartCover units (similar to 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, as noted in the previous annual report, DERM expanded the SSO Response and Prevention Program by adding field and engineering staff positions.

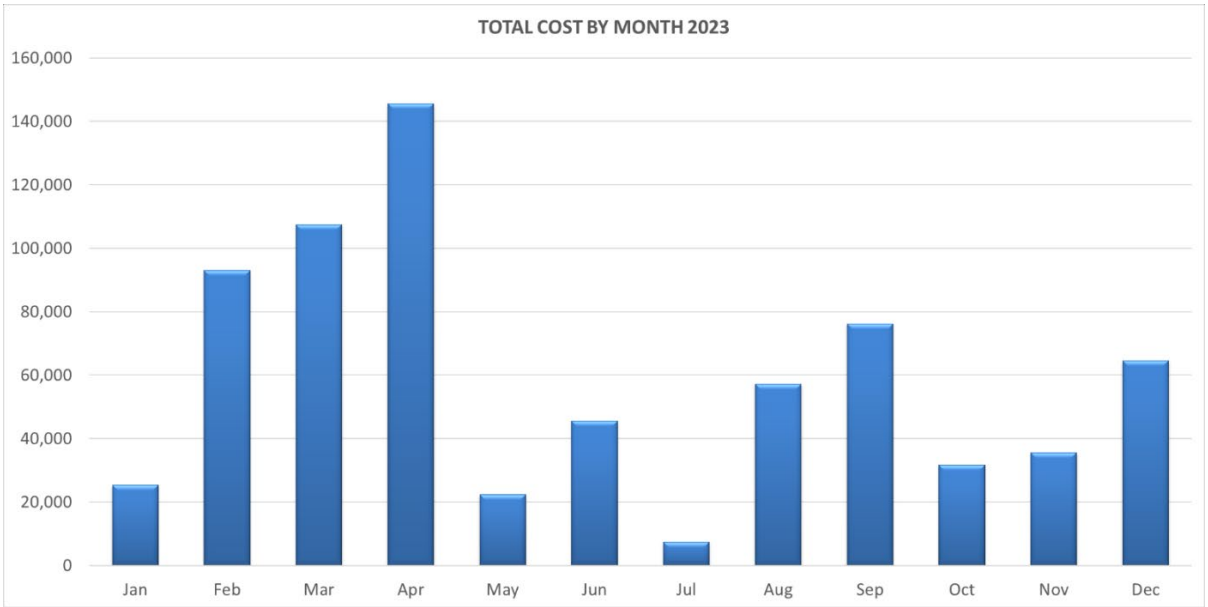

Chart 1c: Total Utility Cost by Month for Maintenance of FOG-related incidents.

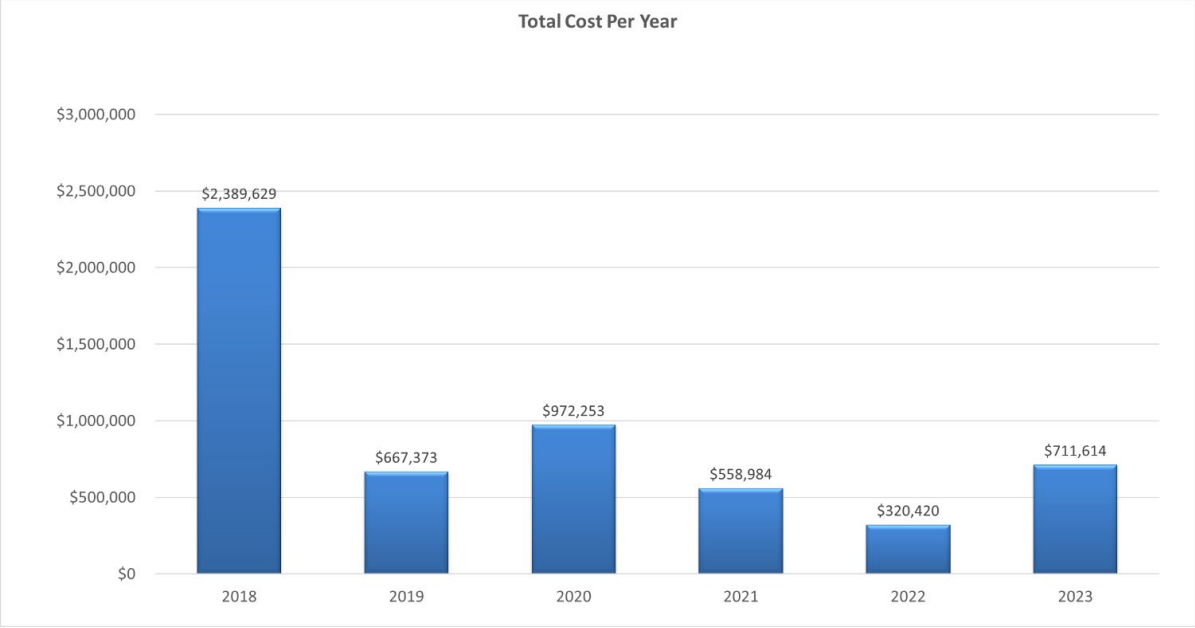

Chart 1d: Total Utility Cost by Year for Maintenance of FOG-related incidents.

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 on accomplishing the goal of zero (0) NGI FSEs by 2025. Additionally, the County increased the cost of penalties for non-complaint facilities. This is expected to further encourage compliance.

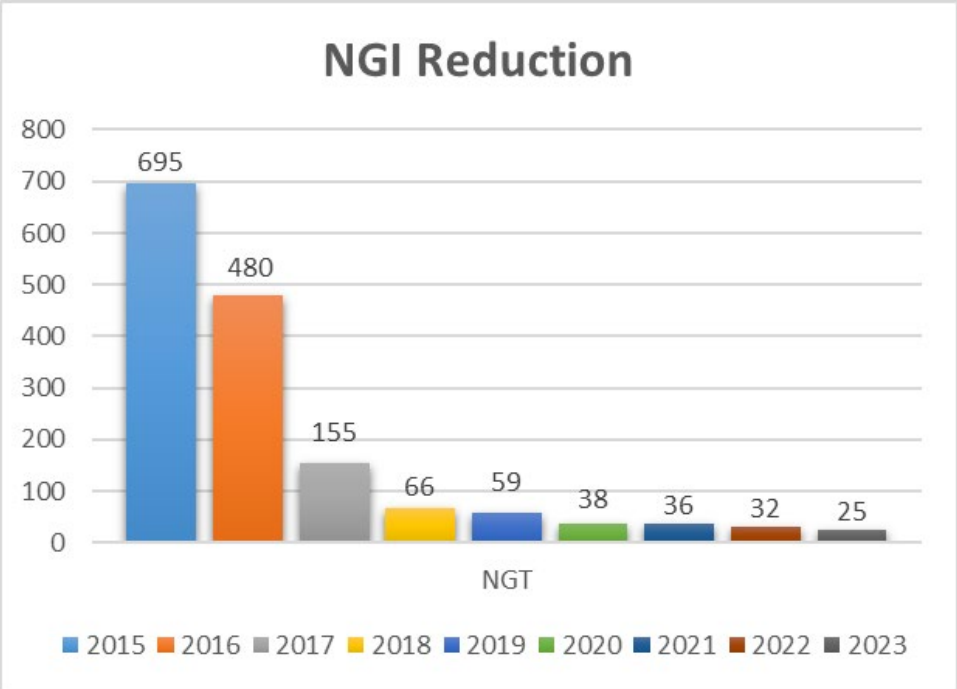

Chart 2: Food Service Establishments without a Grease Interceptor

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 number of routine annual inspections is expected to increase in 2024-2025, an accurate count of breached tanks is also expected to be available. 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 for 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 has been the 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, Prediction

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**	2	2	2	2	Position was moved in 2019 to temporarily address immediate needs in development programs. Replacing position is proposed (1) In 2024, a new Program Manager position will be created to oversee the FOG Inspection Team.
Supervisor	2	2	2	2	**2**	**2**	2	4	4	4	Increase proposed (1)
FOG Inspection Staff	12	12	14(2)	14(2)	**16**(3)	**16**(3)	16	31	31	31	Increase proposed (1)

Gray used to depict estimated future values.
(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, Prediction & 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[1]	2025
Number of sites that need Routine GDO Inspections[1] -->	8,350	9,055	9,406	9,359	9,550
Construction -->	882	1,104	1,349	1,362	1,376
Collection System -->	500	500	500	500	500
Pump Stations -->	3,100	3,131	3,162	3,194	3,226
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 -->	7,842	9,143	9,007	9,187	9,371

Inspection Category	DERM TEAM	Classifications	Task/FTE/Year	2021	2022	2023	2024	2025
Routine	FOG	Inspector	360	23	25	26	26	27
Construction		Inspector	350	3	3	4	4	4
Collection System: Hot Spots, Residential, Complaints	SSORPP Program	Inspector	250	2	2	2	2	2
Public & Private Pump Stations		Inspector	800	4	4	4	4	4
FOG Disposal	PRD	Inspector	200	0	0	0	0	0
eManifest		Inspector	400	1	1	1	1	1
Plan Review/CU/OL/BTR	FOG	Engineering	2000	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.
(1)	Number of sites that require annual routine inspections was revised in 2024 to include facilities that have been notified of permit 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***). Refer to ***Chart 3A*** for the total number of inactive and active GDO Sites.

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. As shown in Chart 3A, the total number of active GDO sites is being considered in this report to better address the annual inspection needs. Active sites include the permitted GDO facilities as well as the ones that have been notified of permit requirements, and others that need to be inspected to determine whether they are in operation or not. Refer to ***Tables 2***, and Charts ***3, 3A,*** and ***4***. As discussed in Section 1.0, Introduction, to achieve routine inspections of all active GDO sites by 2025 will require additional staff. Based on current approved positions, a total of approximately fifteen (15) FTE additional inspection positions and two supervisors will be required. This will require re-assigning staff from other programs and/or adding new positions by 2024.

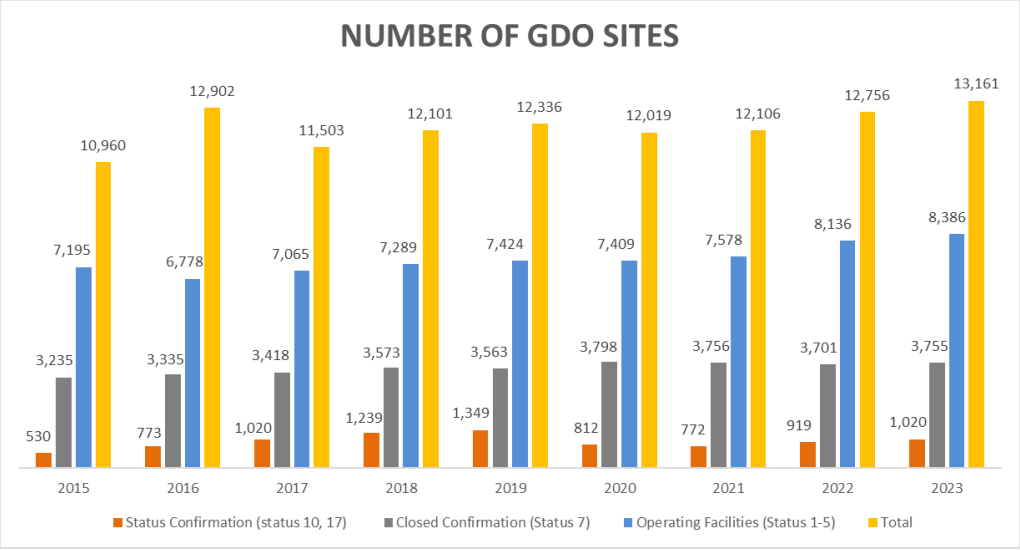

Chart 3: Number of GDO Sites

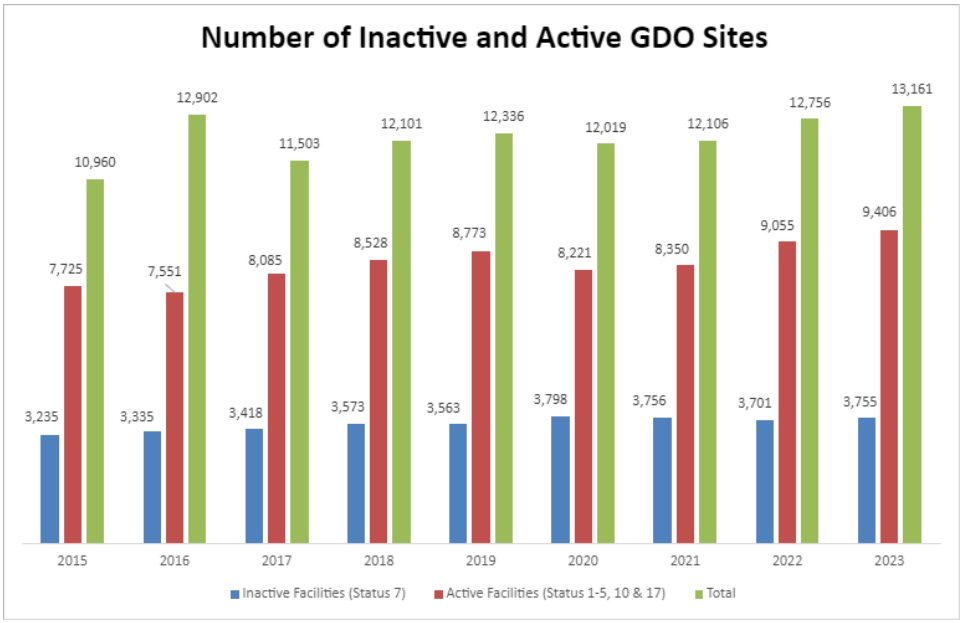

Chart 3A: Number of Inactive and Active GDO Sites

2.4.2 Hot Spots & Complaints Inspections

Hot Spots inspections result from requests from the Utilities to determine possible facilities causing FOG discharges in specific areas. Complaint inspections are conducted based on private, utilities, 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 stormwater 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 previously noted, it is anticipated that the Hot Spots inspections will be performed by the SSO Response, Prediction & Prevention Program in close coordination with the FOG Program supervisors and Program Manager. Current staff turnover has continued to be a challenge to the department.

2.4.3 Construction Inspections

Starting in 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.

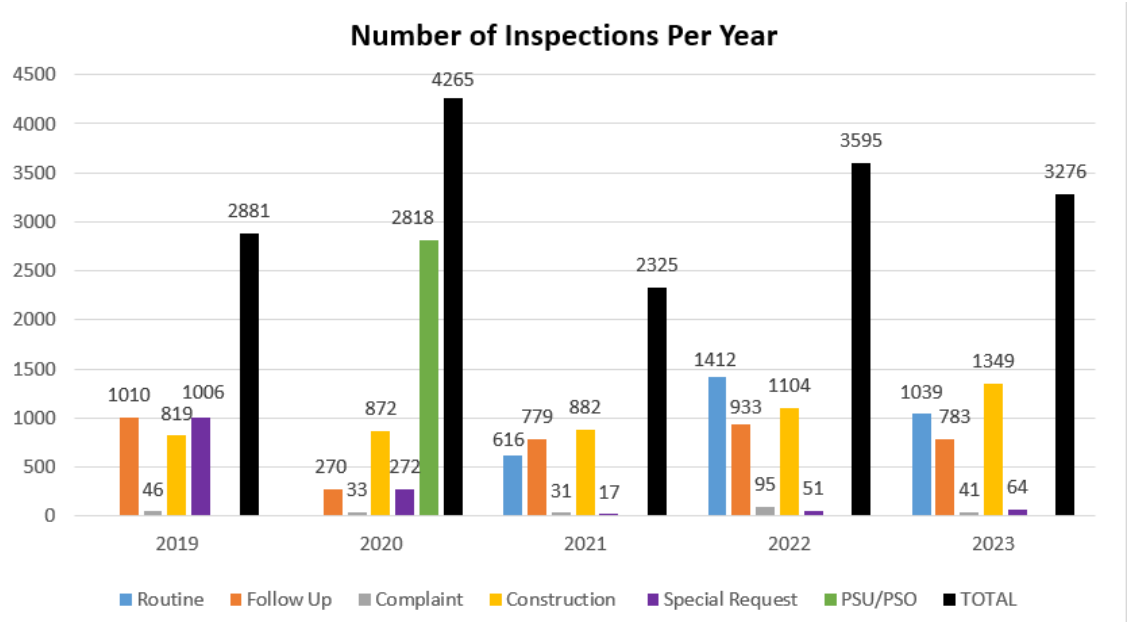

Chart 4: Number of Inspections per Year

2.4.4 Confirmation Inspections

As depicted in Chart 3, there are three main categories of GDO sites: operating (with a permit), closed, and pending status confirmation. The GDO sites pending status confirmation include expired permits and facilities currently operating without a permit, that have been notified of permit requirements. This category totaled 1,020 sites in 2023.

The number of GDO sites pending status confirmation has fluctuated over the years, but its annual average is about 1,000 sites. As depicted in Chart 3A, these sites have been combined with the operating GDO sites under the active facilities category, to better address staff and operational needs. Section 2.4.1 includes the assessment of staff needs for the active facilities category.

2.4.5 FOG Disposal Facility Inspections

To prevent or 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. Nowadays, inspections are randomly performed by the DERM Liquid Waste Program to identify deficiencies in the manifests filled by operators, and in the vehicles used during the waste haul operation. Improvements to the SDWWTP are planned to allow for a separate treatment process for FOG and sewer waste. 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 anticipates that informational postcards to residences in areas impacted by a recent SSO will be sent in 2024. The postcards will include information about the typical causes of an SSO and preventive measures that residents can implement. Residential areas inspections are anticipated to be performed during 2024 by the SSO Response, Prediction and Prevention team. 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. Software could be developed to be integrated into the DERM Liquid Waste program to provide a management system that allows regulatory agencies to track waste from its source to its final point of disposal.

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 slight decrease in 2023. (***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.

The engineering review staff for this program remained at four reviewers from 2020 through 2023. Based on the current and projected workload, this program requires one additional engineering position. That fifth position was added to the team during the first quarter of 2024.

Chart 5: Total FOG Plan Reviews

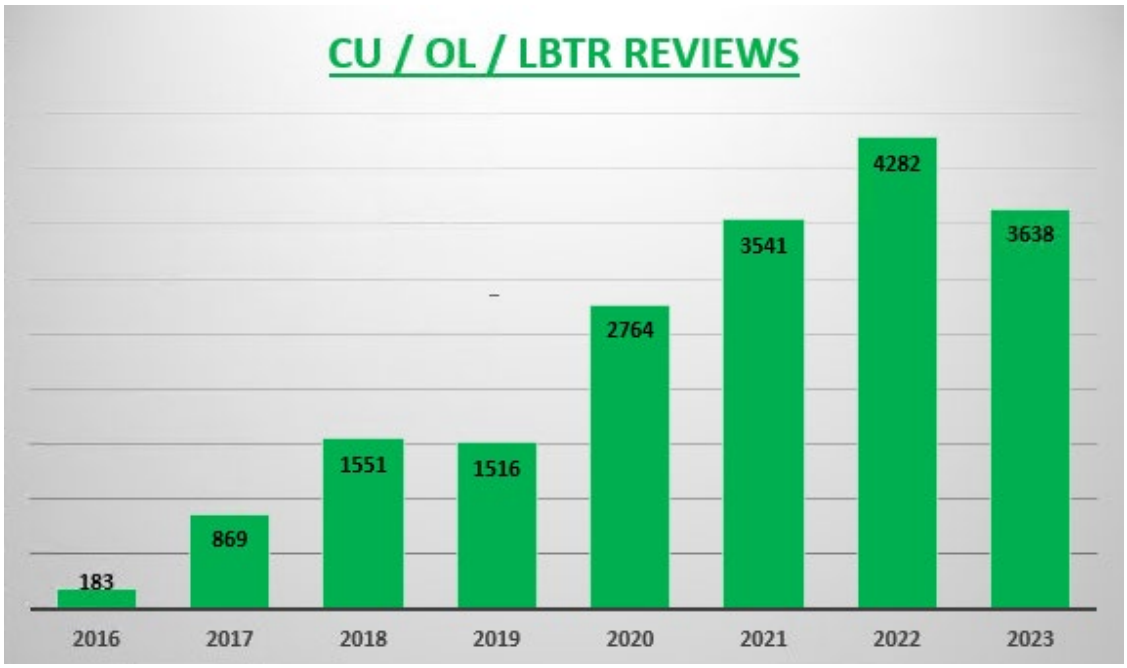

Chart 6: Total FOG Occupational License, Certificate of Use Reviews

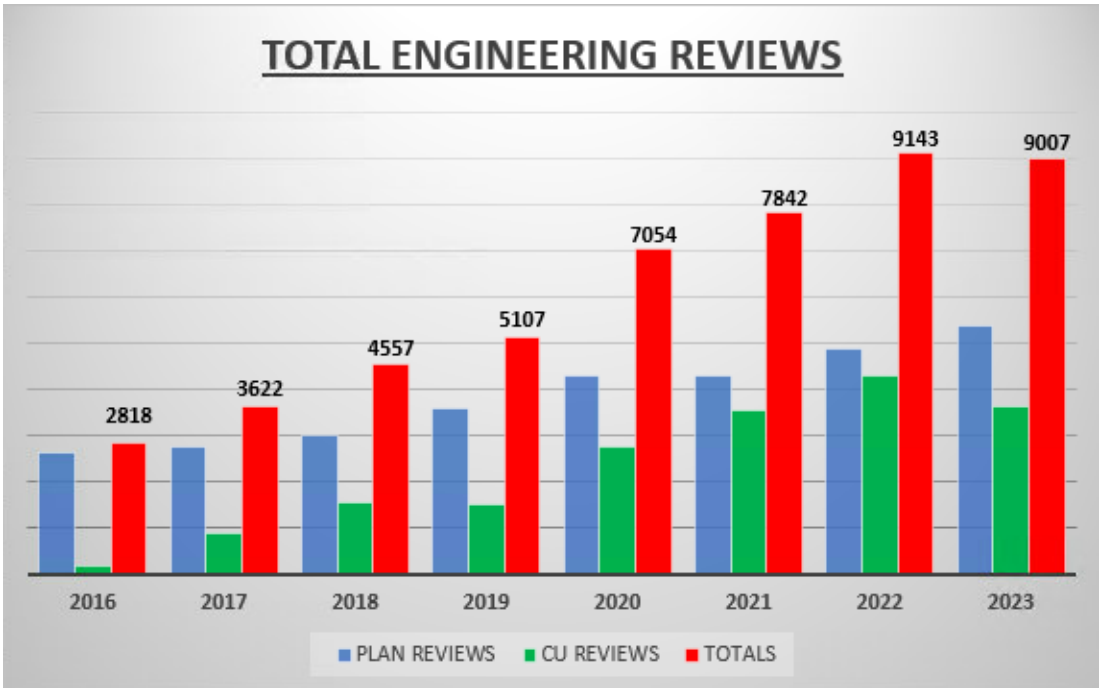

Chart 7: Total Engineering Reviews

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 2023.

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 2024.

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
2023	16	0	16

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 2023, input from stakeholders was requested from utilities. The City of Miami Beach provided feedback regarding the FOG Program on May 3, 2024. The correspondence from the City of Miami Beach is included in ***Attachment 3*** and their responses to the questionnaire are included below:

1. What is your # 1 FOG Concern?

Response: Business owners installing or conducting alterations to grease traps without a permit.

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

Response: Implement a more rigorous inspection program.

3. Are the PM/KPI good indicators?

Response: No Response.

4. Should we add new PM/KPI?

Response: No Response.

5. Other Comments?

Response: No response.

DERM concurs with the recommendations from the City of Miami Beach and will Continue working towards a more rigorous inspection program.

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 the 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 conduct routine inspections. The FOG Team initiated annual routine inspections on permitted facilities on 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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T.O. as of June 2024

WATER AND WASTEWATER DIVISION

Galo Pacheco	**Interim Division Chief**
Star Anorga	Administrative Secretary
Vacant (Galo Pacheco)	Senior Professional Engineer
Tierra Anderson	Secretary
Nolvia Vallega	Electr. Doc. Technician
Sandra Callico	Electr. Doc. Technician
Betsy Olmino	Engineer 2

Water Distribution & Wastewater Collection & Transmission Systems [Expedited Construction Permitting]

Gabriela David (JO#81410)	Professional Engineer
00031366 (JO#81411)	Professional Engineer
00031367 (JO#81412)	Professional Engineer
00031368 (JO#81413)	Professional Engineer
00031369 (JO#81414)	Professional Engineer
00031370 (JO#81415)	Professional Engineer

Water Distribution & Wastewater Collection & Transmission Systems [Construction Permitting]

Rosa Areas	**Engineer 3**
Zhenia Milan	Engineer 2
Pedro Gil Padron	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, and Monitoring]

Oscar Aguirre	**Engineer 3**
Pablo Asencio	Engineer 2
Karina Lopez	Engineer 2
Gloria Suarez	Engineer 2
Mathew Lopez	Engineer 1
Lucas Ruano	Engineer 1
Leyla Vargas Gonzalez	RER P&P Rep.

Water & Wastewater Treatment Systems [Engineering, Reporting, Operation, and Monitoring]

Richard Rojas	**Engineer 3**
Carlos Lincheta	Engineer 2
Frank Agras	Engineer 2
Vacant (Nadia Ramnanan)	Engineer 2
Carlos Icaza	Engineer 2
Jesus Hernandez	Engineer 2
Victor Cabrera	Engineer 2
Isabel Gonzalez	Engineer 2
Jhon Garcia Valencia	Engineer 1
Gabriel Paan	Engineer 1

Water & Wastewater Compliance Section

Laura Castillo	**Manager, DERM Environmental Section**
Vacant (Laura Castillo)	Env. Spec. Supervisor
Jorge Perez	P.C. Inspector 1
Brenda Melendrez	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
Laughlan Lloyd	Env. Tech. 2
Jada Lee	Env. Spec. Supervisor
Vanessa Clayton	P.C. Inspector 1
William Pinger	P.C. Inspector 1
Cedric McQueen	Env. Tech. 2
Nicholas Padgett	Env. Tech. 2
Michael Abreu	Env. Tech. 2
Charles Bryant	Env. Tech. 2
Vacant (Ricky Santos)	Env. Tech. 2
Vacant (Brenda Melendrez)	Env. Tech. 2
Tadeo Monterrubio	Env. Spec. Supervisor
Anthony Cuba	P.C. Inspector 1
Daniela Sabillon	P.C. Inspector 1
Vacant (Matthew Lopez)	P.C. Inspector 1
Daira Marrero	P.C. Inspector 2
Orestes Cecilia Perez	P.C. Inspector 1
Daniela Daniele	P.C. Inspector 1
Eduardo Castillo Salcedo	P.C. Inspector 1
Elveste Sistra	Env. Tech. 2
Gerod Holliman	Env. Tech. 2
Vacant (Jorge del Risco)	Env. Tech. 2
Juan Luis Rodriguez	Env. Tech. 2
Jeanne Pouparina Cabrera	RER P&P Rep.

TALLY:

- Total: 72
- Vacancies: 9
- Overages: 5
- Filled: 58

LEGEND:

- Vacancies in GREEN: (vacated by)
- New Hires
- Overages in RED

MIAMI-DADE COUNTY

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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: 07/01/23

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	07/02/23	657 LENOX AVENUE	33139	80.1392	25.7767	FOG	SWR_MNH_17000	SWR_MNH_17129	350	Hydro Jetting		420	372	429591	$ 280.84	$ 340.40		$ 621.24	245109657 LENOX AVENUE
2	07/07/23	801 S POINTE DRIVE	33139	80.1362	25.7685	FOG	SWR_MNH_15710	SWR_MNH_15748	420	Hydro Jetting		420	372	429591	$ 87.78	$ 170.20		$ 257.98	245114801 S POINTE DRIVE
2	07/10/23	1615 MICHIGAN AVENUE	33139	80.1384	25.7896	FOG	SWR_LTR_10484	SWR_LTR_10484	43	Hydro Jetting		43	372	429591	$ 233.96	$ 340.40		$ 574.36	2451171615 MICHIGAN AVENUE
2	07/17/23	1834 BAY ROAD	33139	80.1441	25.7946	FOG	SWR_LTR_11263	SWR_LTR_11263	39	Hydro Jetting		39	372	429591	$ 52.74	$ 85.10		$ 137.84	2451241834 BAY ROAD
2	07/20/23	1211 71st STREET	33141	80.1318	25.8547	FOG	SWR_LTR_4105	SWR_LTR_4105	31	Hydro Jetting		31	372	429591	$ 232.16	$ 340.40		$ 572.56	2451271211 71st STREET
2	07/22/23	2447 PINE TREE DRIVE	33140	80.1293	25.8015	FOG	SWR_MNH_22879	SWR_MNH_22980	300	Hydro Jetting		525	372	429437	$ 71.52	$ 85.10		$ 156.62	2451292447 PINE TREE DRIVE
2	07/24/23	2545 FLAMINGO PLACE	33140	80.1284	25.8026	FOG	SWR_MNH_22980	SWR_MNH_22958	500	Hydro Jetting		525	372	429437	$ 79.11	$ 127.65		$ 206.76	2451312545 FLAMINGO PLACE
2	07/26/23	1975 WASHINGTON AVENUE	33139	80.1318	25.7963	FOG	SWR_MNH_21665	SWR_MNH_20677	325	Hydro Jetting		525	372	429437	$ 65.84	$ 127.65		$ 193.49	2451331975 WASHINGTON AVENUE
2	07/29/23	1505 WASHINGTON AVENUE	33139	80.1315	25.7877	FOG	SWR_LTR_18382	SWR_LTR_18382	50	Hydro Jetting		50	372	429437	$ 65.84	$ 127.65		$ 193.49	2451361505 WASHINGTON AVENUE

NOTES

*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

City of Miami Beach Feedback Regarding the FOG Control Program

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Pacheco, Galo (RER)

From: Precht, Lindsey <LindseyPrecht@miamibeachfl.gov>
Sent: Friday, May 3, 2024 1:12 PM
To: Castillo, Laura (RER)
Subject: FW: FOG Control Program Annual Report 2023: Committee Member comments

EMAIL RECEIVED FROM EXTERNAL SOURCE

Good Afternoon Laura,

The email below was shared with me by a colleague. Please see minor comments to questions one and two from the perspective of my Department at the City of Miami Beach.

What is Your No. 1 FOG Concern?	• Business owners installing or conducting alterations to grease traps without a permit
If you can change One thing, what would it be?	• Implement a more rigorous inspection program

Thank you,

MIAMIBEACH RISING ABOVE

Lindsey Precht (pronouns she/her)
Assistant Director
Environment & Sustainability Department, ISO 9001 Certified
1700 Convention Center Drive – 3rd Floor, Miami Beach, FL 33139
Office: 305-673-7000 x.26008
Cell: (786) 390-8150

Good afternoon,

Miami Dade County is requesting our assistance as they are preparing the 7th FOG Control Program Annual Report to EPA and we need to request your input to evaluate our program.

- Evaluate FOG inspection compliance and compliance assistance effectiveness in reducing wastewater collection and transmission system blockages and sanitary sewer overflows (SSOs).
- Discuss how Performance Measures (PMs) and Key Performance Indicators (KPIs) are measured, tracked, and evaluated.

We kindly request that you answer these questions and send your responses by Friday, May 3rd 202 to Laura.Castillo miamidade.gov.

1. What is your main FOG Concern?
2. If you can change one thing, what would it be?
3. Are the PM/KPI good indicators?
. Should we add a new PM/KPI?
5. Do you have any other Comments?

We appreciate your continued support of this program and hope to hear from you soon.

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 Goal is to have None by end of 2018
	FOG Inspection Frequency	FOG Inspections	100% Annually by 2019
	FOG Education (Residential)	Education	Six (6) Events Annually, to be fully implemented by March 4, 2020
	FOG Stakeholder Outreach (commercial/industrial)	Outreach	Six (6) Events Annually

Best Regards,
Odalys Guevara, *Engineer*
BUILDING DEPARTMENT
1700 Convention Center Drive, Miami Beach, FL 33139
Tel: 305-673-7610 ext. 2704/ Fax: 786-394-4455

Odalysguevara@miamibeachfl.gov

We are committed to providing excellent public service and safety to all who live, work and play in our vibrant, tropical, historic community