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**VIA ELECTRONIC CORRESPONDENCE**

June 30, 2026

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File No: 8.DC.20.19

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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)  
Ninth 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 Ninth 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) 372-6789.

Sincerely,



Rashid Istambouli for

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# Miami-Dade County FOG Control Program

## 9<sup>th</sup> Annual FOG Control Program Review Report

June 30, 2026

Prepared by

**Miami-Dade County Department of Environmental Resources  
Management (DERM)**

Prepared for:

**United States Environmental Protection Agency and  
Florida Department of Environmental Protection**

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# 9<sup>th</sup> Annual FOG Control Program Review Report

**PREPARED BY:**

**Miami-Dade County Department of Environmental Resources Management (DERM)**

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**Status: Final**

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Ref:	Annual Report	Date:	06-30-2026
Prepared by:	Galo Pacheco, PE		

**Revision History**

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				Galo Pacheco, P.E.	<i>Galo Pacheco</i>
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		Final	Galo Pacheco, PE		

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## 1. Introduction

The Miami-Dade County (MDC) Department 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, MDC'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.

On March 2025, the Miami-Dade County Department of Regulatory and Economic Resources, RER, reorganized operations in the FOG Control Program to improve environmental permitting and compliance inspections. As part of this process, the former FOG compliance team was divided into two groups, one for FOG Compliance inspections under the RER Code Compliance Division (CCD) and the second one for FOG Construction Inspections, under the RER Environmental Plan Review Division (EPRD). In addition, the FOG Engineering Team, in charge of plan reviews and certificate of use reviews was also transferred to the EPRD.

Some FCP functions remained with the Water & Wastewater Division (W&WWD) of MDC RER-DERM after the reorganization, including coordination of FOG Accelerated Maintenance Reports, follow-up of historic open enforcement actions and program reporting.

Effective October 1, 2025, Miami-Dade County reinstated the Department of Environmental Resources Management (DERM) as an independent department. Prior to this, DERM was a Division of RER. This strategic reorganization is intended to streamline County functions to improve key services for the residents and businesses, strengthening the county's commitment to protecting the environment while helping businesses to thrive across the community by making processes and approvals more efficient and customer friendly. As a result of this reorganization,

all permitting, plan review functions and FOG Construction Inspections remain with the Department of Regulatory and Economic Resources, and environmental compliance, environmental monitoring, inspections, enforcement, and policy development remain with DERM. On April 13, 2026, the FOG Compliance team returned to DERM under the Water & Wastewater Division, to continue performing compliance inspections of FOG generating facilities.

## 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 <sup>(1)</sup>
	Routine FOG Inspection Frequency	FOG Inspections	100% Annually by September 2019 <sup>(2)</sup>
	FOG Education (Residential)	Education	Six (6) Events Annually Implementation of the program by March 5, 2020 <sup>(3)</sup>
	FOG Stakeholder Outreach (commercial/industrial)	Outreach	Six (6) Events Annually

(1) New Date Proposed: 2026 Refer to Section 2.2.

(2) New Date Proposed: 2026, Refer to Section 2.4.1

(3) New Date Proposed: 2026, Refer to Section 2.4.6

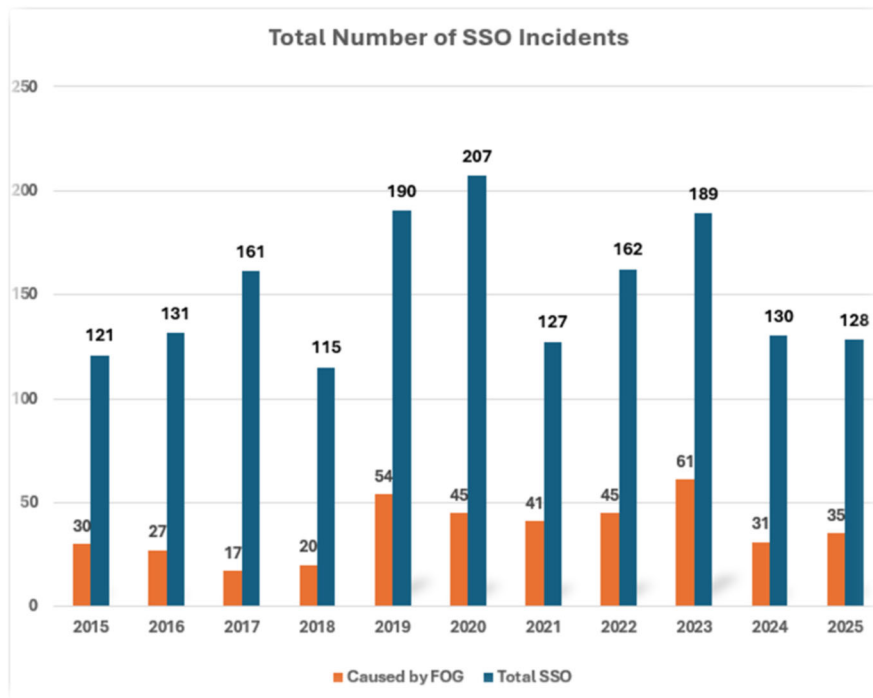
**Table 1. PMs & KPIs**

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 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 (URT) 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 collectively and by each utility as presented in **Charts 1a and 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 several years after March 2018, the implementation date for the new FCP/FCO.

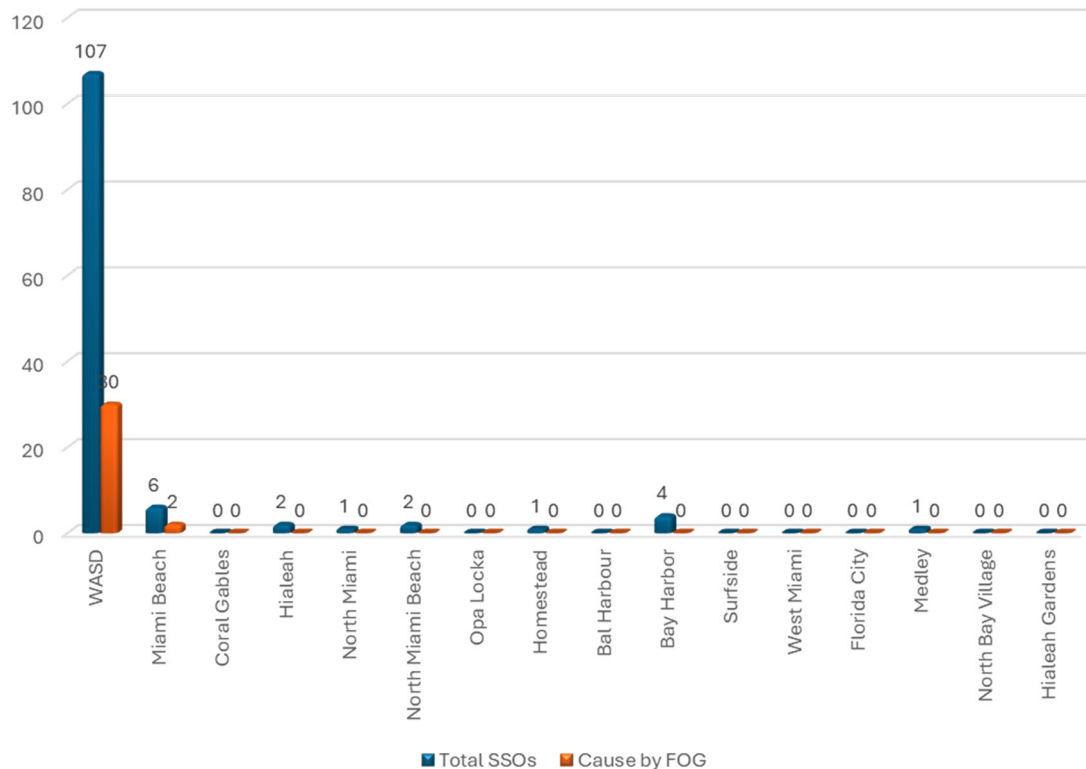


**Chart 1a: 2025 Sanitary Sewer Overflows for All Utilities**

The following is a summary of findings related to FOG-related SSOs:

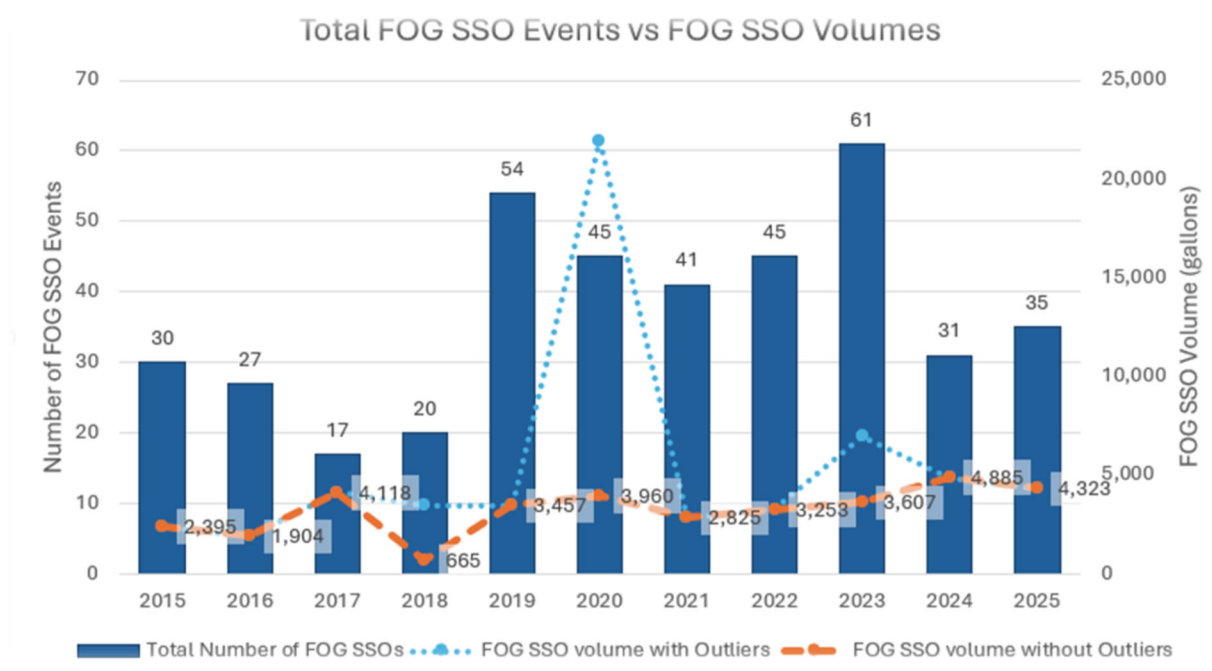
1. The implementation of the FCO in 2018 and other requirements of the Consent Decree, triggered an increasing number of reported FOG-related SSOs in 2019. However, commercial activity was substantially reduced during 2020 and 2021 due to the Covid 19 Pandemic, and there was, consequently, a reduction in the number of SSO events caused by FOG. In 2022, when commercial activity started to normalize, the number of reported FOG-related SSOs increased, reaching another peak in 2023. As shown in Chart 1a, there was a significant reduction in the number of FOG-related SSOs in 2024 and 2025, which could reflect the FCP efforts such as inspections, FOG control system design, plan review, permitting, Smart Covers monitoring, and utility maintenance and operation efforts. DERM continues to refine data for better reporting. For this report, only sanitary sewer overflows that occurred within the collection system were included, while incidents inside the wastewater treatment plants have been excluded.

### 2025 Utility Reported SSOs



**Chart 1b: 2025 Sanitary Sewer Overflows Reported by Utility**

2. As in previous years, Miami-Dade Water and Sewer Department (WASD), the largest sewer utility in Miami-Dade County, is also the utility that experiences more SSOs due to FOG and other causes. The total number of SSOs and FOG-related SSOs reported by each utility in 2025 are shown in **Chart 1b**.
  
3. **Chart 1c** shows the total volume per year of FOG-related SSOs versus the total annual number of FOG SSO events. The chart shows a fluctuation in the volume discharged, with very noticeable outliers in 2018, 2020, and 2023 as analyzed in the 8th Annual Report submitted in 2025. Chart 1c also includes FOG-Related SSOs without the three outliers described above. This allows us to see substantial reductions on the total annual FOG-related SSO volumes in those three years. During 2025, there was a slight increase in the number of FOG related SSOs, from 31 to 35, and a decrease in the number of gallons discharged from 4,885 gallons to 4,323 gallons compared to 2024.



**Chart 1c: FOG-Related SSOs – Total Volumes per Year**

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 and Hot Spot reporting) process improvements. These along with the installation and monitoring of Smart Covers continue to be key factors for the prevention of SSOs in Miami-Dade County.

As previously reported, MDWASD had integrated a real-time level monitoring system (Smart Cover) 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. Utility reporting improved in 2025 as DERM implemented presentations during the Utility Roundtables enhancing the importance of reporting, monitoring and analysis of hot spots and areas that need frequent cleaning. DERM will continue using regulatory compliance tools to ensure that all the sewer utilities comply with the FCP requirements. Currently, the FOG Compliance Team supervisors review complaints and prioritize inspections accordingly. A sample Accelerated Maintenance Report is included in **Attachment 2**. Accelerated Maintenance Reports provide the monthly costs by sewer utility for maintenance of FOG Hot Spots, and incidents due to FOG. There was a slight increase from \$425,262 in 2024 to \$433,629 in 2025 in the total cost for accelerated FOG maintenance. This could be attributed to more consistent reporting from the utilities. The total monthly and annual costs by utilities are included in **Chart 1d** and **Chart 1e** below.

### Total Utility Cost by Month for Maintenance of FOG-Related Incidents

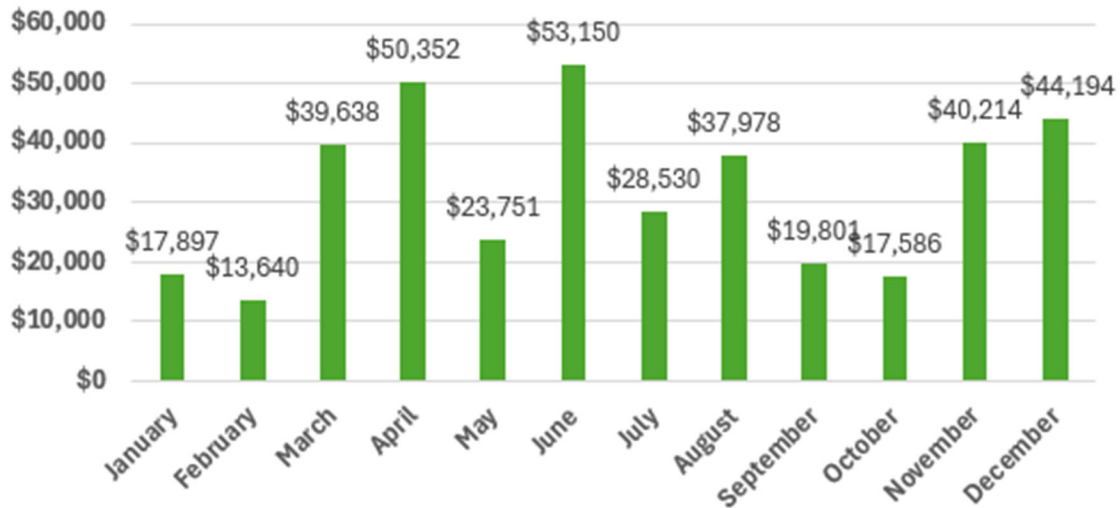


Chart 1d: 2025 Total Utility Cost by Month for Maintenance of FOG-related incidents.

### Annual Cost FOG Accelerated Maintenance

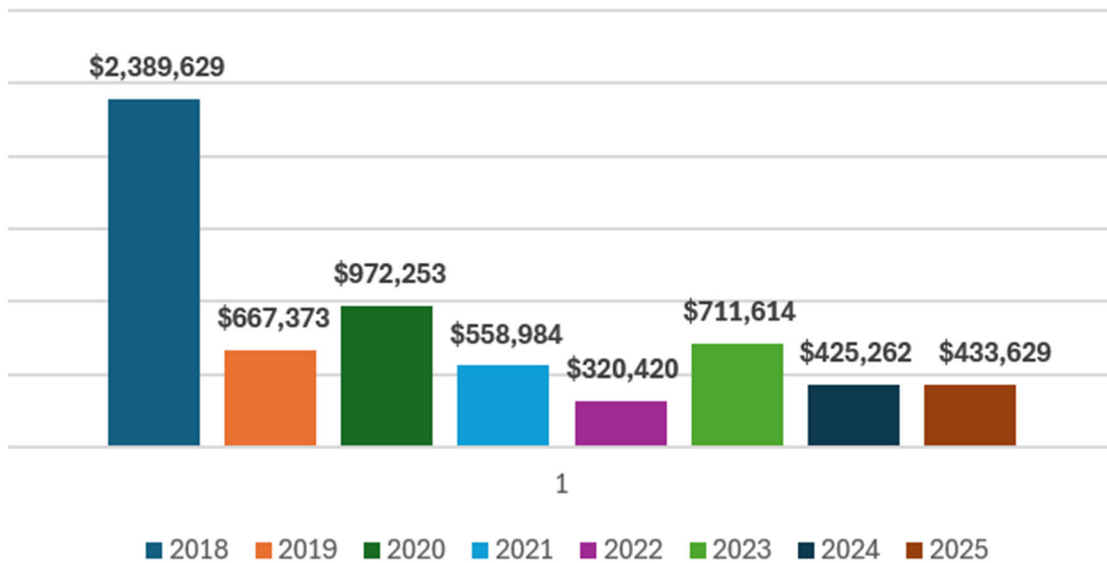
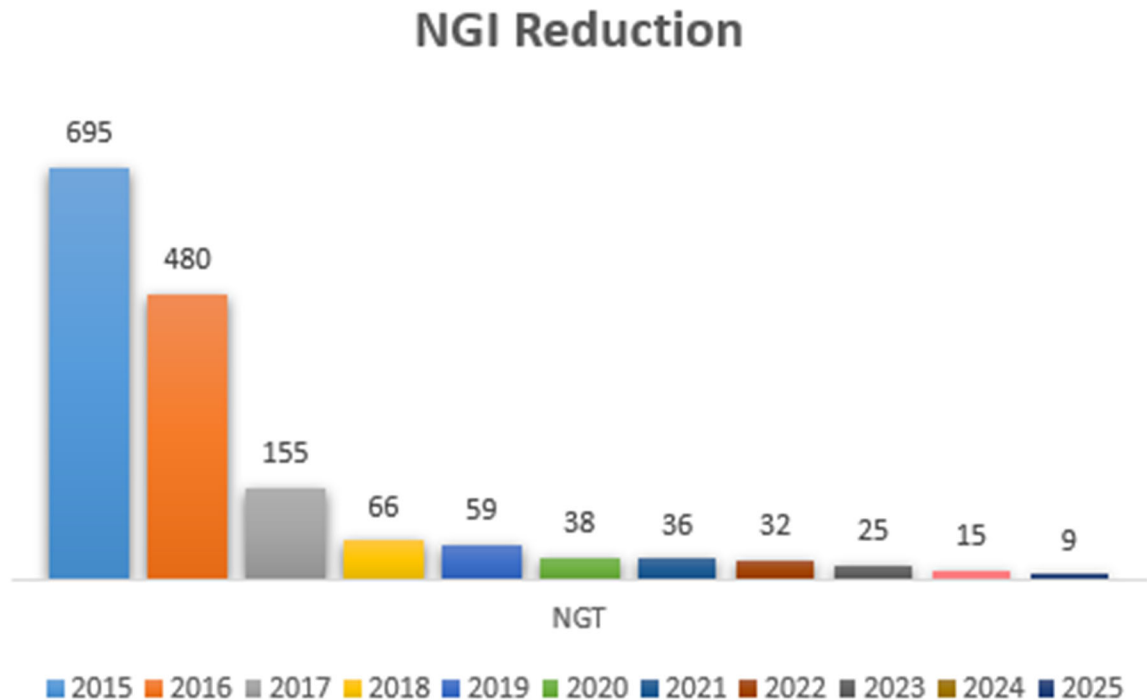


Chart 1e: Total Utility Cost by Year for Maintenance of FOG-related incidents.

DERM continues to review and investigate data and high-level alarms from the 426 DERM-owned Smart Cover units to, in collaboration with sewer utilities, reduce the number and volume of FOG-Related SSOs. FOG compliance inspections at FSEs in the area where high level alarms are received are conducted to verify compliance with best management practices, FCD efficiency and to educate the operators and guide them to compliance.

## 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.



*Chart 2: Food Service Establishments Without a Grease Interceptor*

The total number of NGI FSEs have decreased from **695** in 2015, to 9 in 2025 (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 2026. Additionally, the County increased the cost of penalties for non-compliant facilities. This is expected to further encourage compliance.

### **2.3 Number of Breached FOG Control Devices**

As the number of annual compliance inspections is expected to increase in 2026, breached grease interceptors, deficiencies, and all other violations will be addressed and enforced during the routine inspections to be performed by the FOG Compliance Inspections Team.

### **2.4 FOG Program Workforce Analysis**

Workforce resources and workload were evaluated to assess future staffing needs. The workload was analyzed by specific task/assignments and modified after the recent reorganization of the program.

On October 1<sup>st</sup>, 2025, DERM was designated as an independent Department within the Miami-Dade County organizational structure. As part of this reorganization, the FOG Compliance Team returned to DERM on April 13<sup>th</sup>, 2026, with two Environmental Specialists Supervisors, six filled Environmental Technician 2 (ET2) positions, and eleven vacant positions (nine ET2 positions, one FOG Construction Inspector and one Compliance officer). Due to MDC budget constraints for the FY 2025-2026, filling vacancies proved challenging. DERM is currently exploring strategies to improve employee retention and streamline the hiring process to fill all vacancies to reach the program's inspection goals. To improve operations in the FOG Compliance inspection team, the supervisor-inspector ratio is being increased to 1:4.

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	2 <sup>(1)</sup>	2	2	No changes. Due to reorganization, the program is divided into two Departments
Program Manager	1	0	0	0	1	1	1	2 <sup>(1)</sup>	2	2	No change. Due to reorganization, the program now has two Manager positions.
Supervisor	2	2	2	2	2	2	2	3 <sup>(1)</sup>	2	4 <sup>(7)</sup>	Decrease due to reorganization in 2026 and proposed increase in 2027
FOG Compliance Inspector	10	10	10	10	12 <sup>(3)</sup>	12	12	15 <sup>(1)(5)</sup>	16 <sup>(6)</sup>	15	Increase on 2026 due to reorganization.
FOG Construction Inspector	2	2	4 <sup>(2)</sup>	4	4	4	4	3 <sup>(4)</sup>	3	3	No change. Staff conducting FOG Construction Inspections in Municipal projects
Administrative Support	0	0	0	0	0	0	0	2 <sup>(1)</sup>	2	2	No change. Includes staff for Compliance & Construction inspection teams
Training & Outreach Coordinator	0	0	0	0	0	0	0	1 <sup>(1)</sup>	0	0	Decrease due to reorganization
Compliance Officer	0	0	0	0	0	0	0	0	1	0	Increase on 2026 due to reorganization.
<p><b>Blue used to depict estimated future values</b></p> <p>(1) Additional positions are proposed to address programmatic initiatives</p> <p>(2) Positions added to assist with pump stations</p> <p>(3) Positions added to support the FOG Compliance program. Excluding Public &amp; Private Pump Station</p> <p>(4) The number of inspection staff reduced during reorganization. *Staff dedicated only to FOG</p> <p>(5) Due to the RER reorganization, the SSO Prevention &amp; Response staff was reassigned to other areas</p> <p>(6) Due to reorganization former FOG Construction Inspector position transferred to FOG Compliance</p> <p>(7) Proposed reclassification of Compliance Officer and one FOG Compliance Inspector positions as Supervisors to have a balanced Inspector/Supervisor ratio</p>											

**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		
<b>Total Time Before Deductions:</b>	<b>52 weeks/ per year</b>	<b>260 working days/per year</b>
<b>Type of Deduction</b>	<b>Weeks</b>	<b>Days</b>
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
<b>Total Time Deducted:</b>	<b>11.8</b>	<b>59</b>
<b>Total Working Time Remaining:</b>	<b>40.2</b>	<b>201</b>
<b>201 Working Days x 4 Inspections per day =</b>		<b>201 x 4= 804 per year</b>
<b>Reinspection Ratio =</b>		<b>2.25/1</b>
<b>Number of GDOs Inspected per year/FTE =</b>		<b>357.33</b>

Table 3: Basis for Staffing Calculations

YEAR -->				2021	2022	2023	2024 <sup>(1)</sup>	2025	2026
<b>Number of sites that need Routine GDO Inspections<sup>(1)</sup> --&gt;</b>				8,350	9,055	9,406	9,793	10,004	10,039
<b>Construction --&gt;</b>				882	1,104	1,349	1,317	926	935
<b>FOG Disposal --&gt;</b>				62	62	62	62	62	62
<b>eManifest --&gt;</b>				500	500	500	500	500	500
<b>Plan Review &amp; CUOLBTR --&gt;</b>				7,842	9,143	9,007	10,192	11,950	12,189
Inspection Category	DERM & RER TEAMS	Classifications	Task/FTE/Year	2021	2022	2023	2024	2025	2026
Routine (Annual Inspections)	FOG Compliance <sup>(2)</sup>	Inspector	357	23	25	26	27	28	28
Routine (Proposed Biannual Inspections) <sup>(3)</sup>	FOG Compliance <sup>(2)(3)</sup>	Inspector	357	12	13	13	14	14	14
Construction	FOG Construction Inspections	Inspector	350	3	3	4	4	3	3
FOG Disposal	PRD	Inspector	200	0	0	0	0	0	0
eManifest		Inspector	400	1	1	1	1	1	1
Plan Review/CUOLBTR	FOG	Engineering	2000	4	5	5	5	6	6
Inspector:		Broad group that includes staff trained to perform field inspections. May include multiple classifications that may change based on program-specific requirements.							
<sup>(1)</sup>		Number of sites that require annual routine inspections was revised in 2024 to include facilities that have been notified of permit requirements.							
<sup>(2)</sup>		The number of Hot Spot, Residential and Complaint FOG Inspections have averaged 95 in the past 4 years. These inspections will be performed by the FOG Compliance Team.							
<sup>(3)</sup>		The number of FTEs has been recalculated based on biannual instead of annual routine inspections.							

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 slightly 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 considered 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 **Table 2**, and **Charts 3, 3A**, and **4**.

To achieve routine inspections of 90% of the active GDO sites by 2025, required an increase on the level of service (LOS) per FTE to 6 inspections per worked day and improvement of the inspection platforms, mobile applications and databases to enhance efficiency. However, after implementing that LOS, further analysis demonstrated that a LOS of 4 inspections per worked day was more realistic and allowed for adequate follow-up and compliance assistance. Consequently, to increase the number of routine inspections in 2025, staff from other units supplemented the FOG Team after their regular shifts, using overtime pay. This resulted in an increase of routine inspections from 2,077 in 2024 to 3,813 in 2025, but still below the goal of 9,729 sites that needed an inspection for 2025. This was achieved with the participation of a number of dedicated FTEs and 18 additional members of different units from the Building and Neighborhood Compliance Divisions of RER, collaborating on a temporary basis.

During 2025 the FOG compliance team was never fully staffed, fluctuating at any given time between 4-9 of the 15 approved FTE positions.

On April 13, 2026, as part of the reinstatement of DERM as an independent Department in MDC, the FOG Compliance program returned to DERM and therefore no longer has access to the temporary RER staff available to assist in 2025.

Currently, the FOG Compliance team has a total of 15 FTE positions, 9 of which are currently vacant. Currently MDC is going through fiscal constraints that would not allow the creation of additional positions. Based on a LOS of 4 inspections per day per FTE and the number of FSEs that require an annual inspection surpassing 10,000 facilities, the number of FTEs needs to be increased to 28 FTEs and 7 Supervisors. However, if the inspection frequency could be changed to every 2 years, the number of staff required to inspect all facilities would decrease by half to 14 FTEs and 4 supervisors, consistent with the positions available at this time. **Table 4** illustrates the staffing analysis based on current conditions. DERM will submit a request to EPA to consider revising the inspection frequency of FOG permitted facilities to every two years.

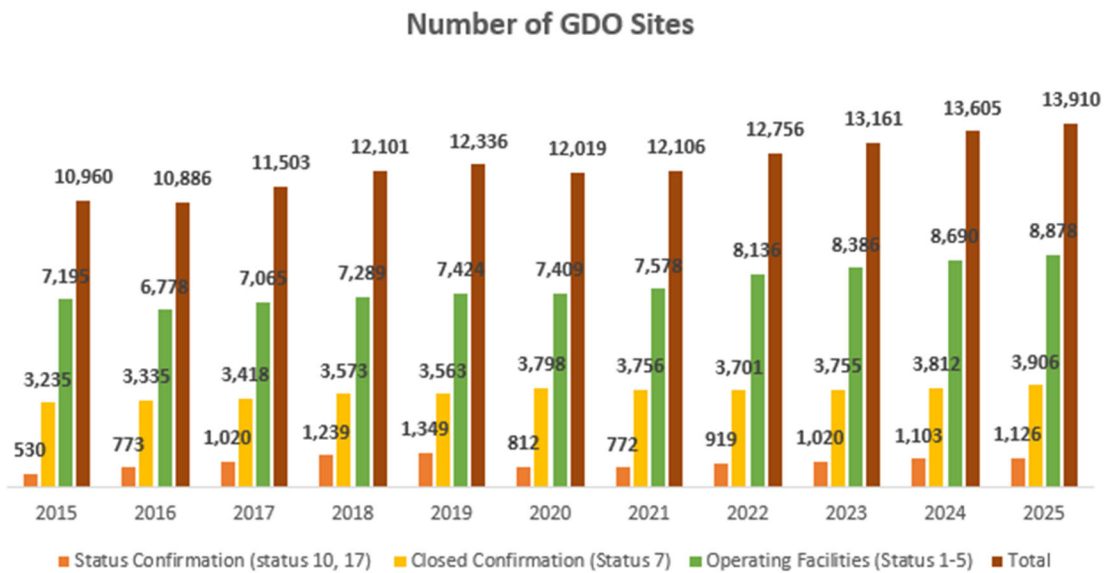
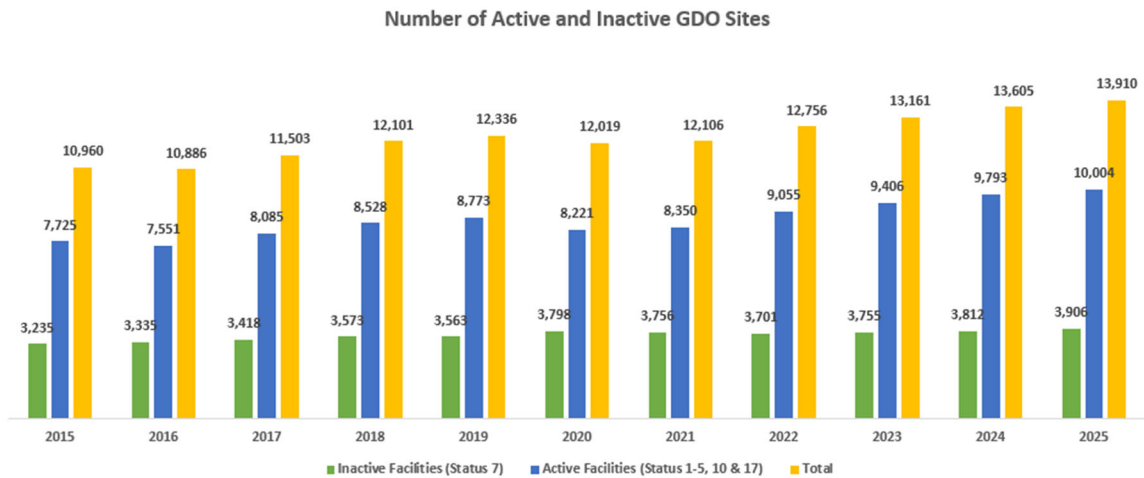


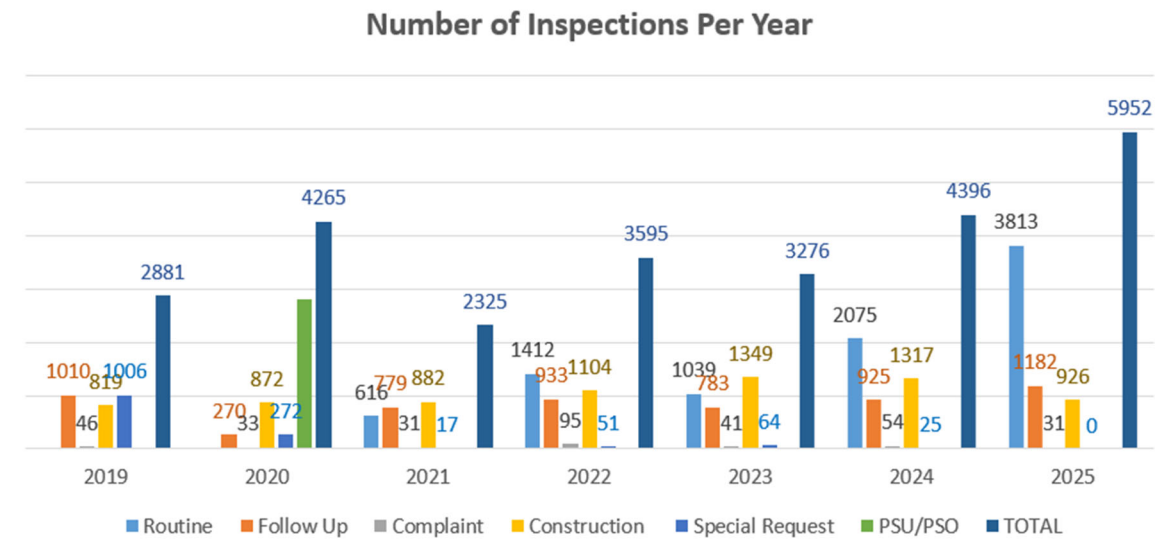
Chart 3: Number of GDO Sites

DERM will continue to perform routine compliance and hotspot inspections with available staff. Supervisors will closely monitor the productivity of FTEs and ensure that enforcement cases are followed up on in a timely manner. During inspections, FTEs will educate owners and operators on best management practices and GDO permit conditions

to promote compliance and reduce FOG discharges into the sanitary sewer collection system. Additionally, filling all vacancies will remain a priority throughout 2026.



**Chart 3A: Number of Inactive and Active GDO Sites**



**Chart 4: Number of Inspections per Year**

## 2.4.2 Hot Spots & Complaint 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 that added 426 Smart Cover units in sanitary sewer systems within Miami-Dade County's Canal Basins DA-1, C-4, C-5, C-6, C-7 and C-8. 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 potential SSOs have already been prevented. DERM's team continually receives notifications from the Smart Cover 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, debris and rags), inflow, and even illegal discharges into the system.

The Hot Spots inspections are performed by the FOG Compliance Team in coordination with the utilities.

## 2.4.3 Construction Inspections

Beginning in March 2018, following approval of the FCO, DERM initiated construction inspections to verify compliance with approved plans. These inspections have proven invaluable, as they allow issues to be identified and addressed during the construction phase, prior to the final inspection and the issuance of a Certificate of Occupancy or Completion by the Municipal Building Department. Addressing deficiencies after a CO or CC has been issued is often very difficult, largely because contractors have typically been paid in full and have demobilized from the site. In 2025, a total of 926 construction inspections were conducted (see **Chart 4**).

At the beginning of 2025, the FOG Inspection Program had sufficient authorized positions; however, several vacancies remained unfilled. In March 2025, the FOG Program underwent a departmental reorganization within RER aimed at improving the inspection and plan review process. As part of this effort, the FOG Compliance Team was transferred to the Code Compliance Division of RER, while the FOG Plan Review and Construction

Inspection Teams were reassigned to the Environmental Plan Review Division of RER. As a result of this change, the number of staff assigned to construction inspections was reduced from four (4) Pollution Control Inspector I (PCI I) positions to three (3) and is currently fully staffed. These inspectors report to a Professional Engineer who also supervises the FOG engineers responsible for plan reviews and certificate of use reviews. The Department will continue to evaluate staffing needs.

#### 2.4.4 FOG Disposal Facility Inspections

The Miami-Dade Water and Sewer Department (MDWASD) completed construction of a new FOG disposal facility at its South District Wastewater Treatment Plant (SDWWTP) in 2026. MDWASD has commenced operations at this new facility to allow for testing and start-up operations. The County's Liquid Waste Transporters (LWT) program is to conduct records inspections to verify that FOG waste hauled into the plant is not commingled with other types of waste (e.g., septage, etc). LWT program staff is to work with MDWASD plant staff to verify that proper vetting of manifests is being performed by plant attendants to ensure compliance with applicable manifesting and transportation requirements at the time of hauled waste disposal.

#### 2.4.5 eManifest Inspections

Liquid Waste Transporters (LWT) and FOG generating facilities operating in Miami-Dade County are required to submit information concerning the collection, transportation and disposal of FOG waste using the County's eManifest system. The system generates reports that may be cross-checked with monthly reports submitted by LWTs and the usage reports generated by the SDWWTP. Review of the eManifest data is an ongoing activity of the LWT program (for hauled waste) and of the FOG compliance group (for FOG generating facilities).

### 2.5 FOG Construction Plans and Certificate of Use Reviews

An indicator of potential increases or declines in the total number of GDO facilities is the volume of Construction Plans and Certificate of Use submittals. Construction plans submittals continue to show an upward trend, as illustrated in **Chart 5** below. Certificate of Use applications also increased in 2025 (see **Chart 6**). A combined chart summarizing all engineering reviews is provided in **Chart 7**.

### PLAN REVIEWS

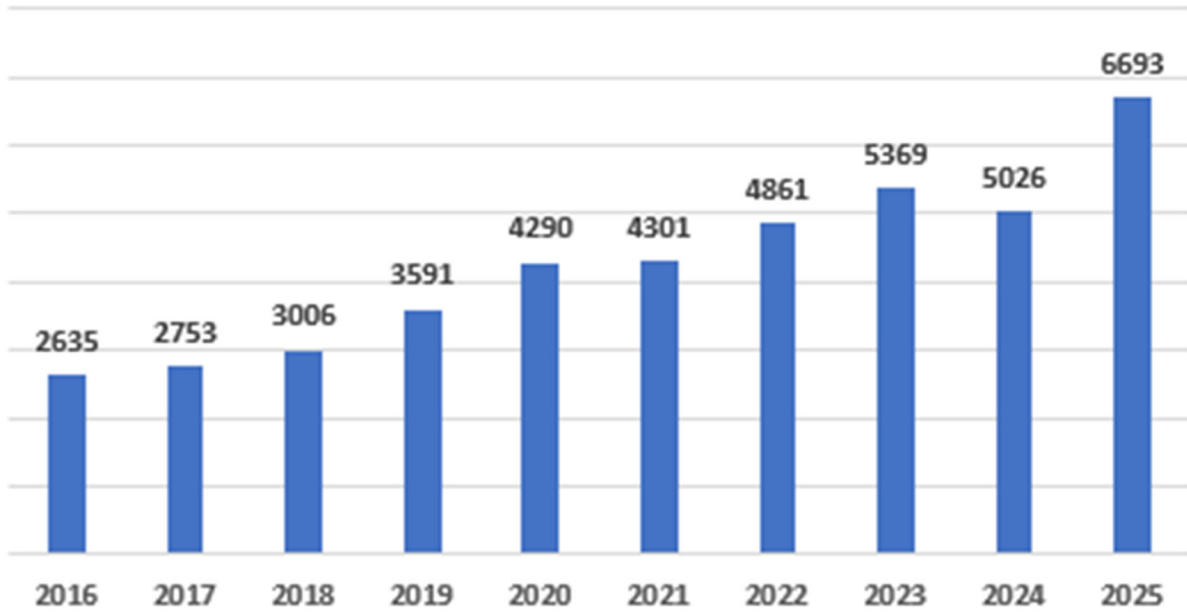


Chart 5: Total FOG Plan Reviews

### FOG Certificate of Use Reviews

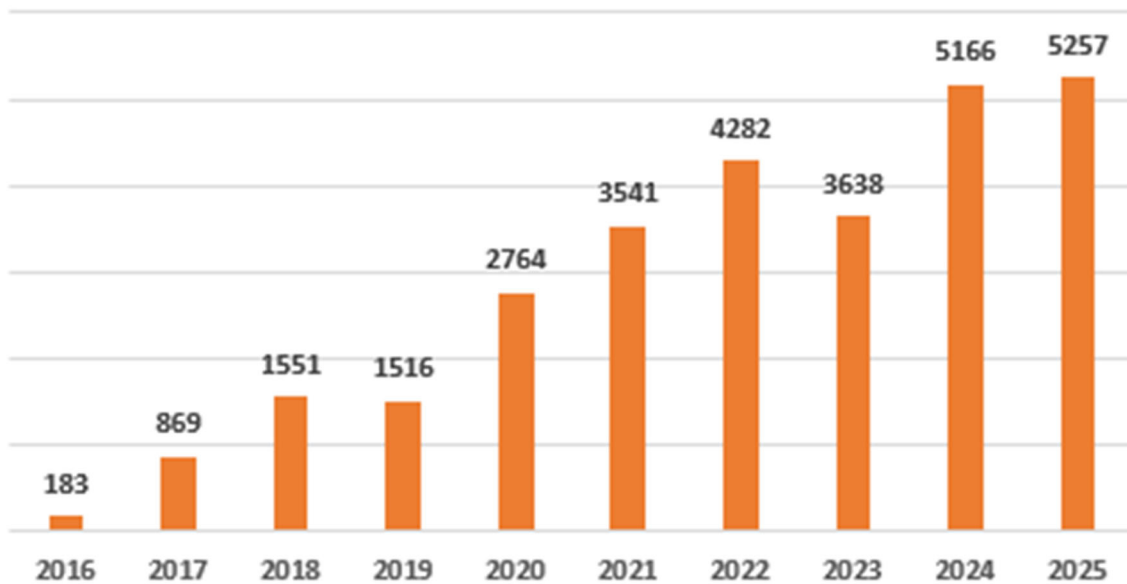
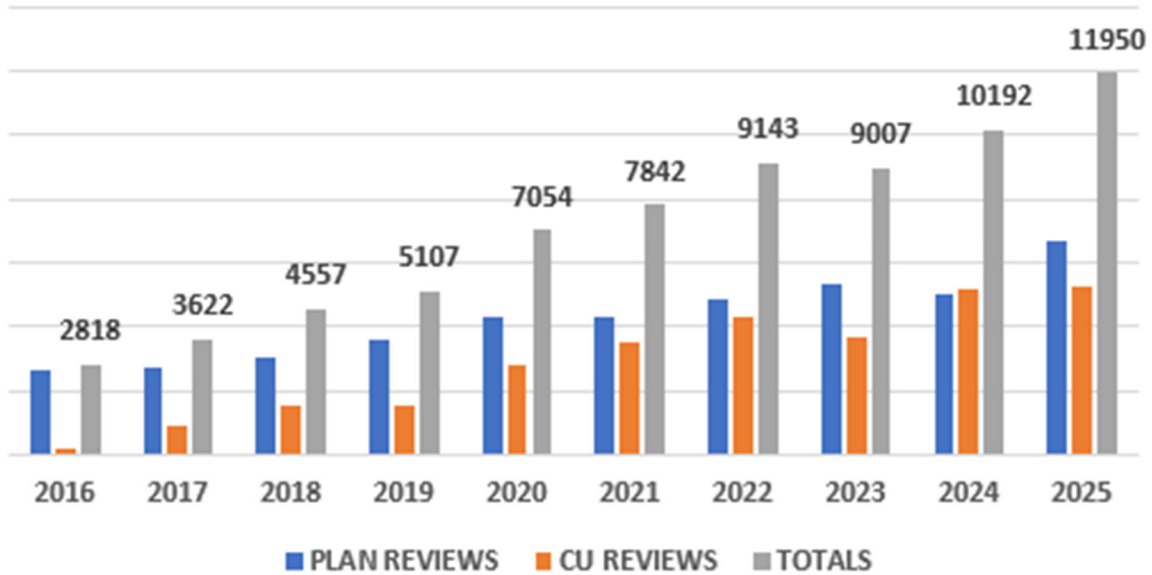


Chart 6: Total FOG Occupational License, Certificate of Use Reviews

### Total Engineering Reviews



*Chart 7: Total Engineering Reviews*

The significant increase in reviews may be attributed to improved coordination and the transition to an electronic review process, which reduces the likelihood of municipalities bypassing the county’s (FOG) review process. How this increased activity will translate into GDO permits remains uncertain; however, the overall rise in reviews suggests that the number of permitted facilities (GDOs) will likely continue to grow.

During 2025, the program had five engineers performing plan reviews—three Engineer II positions and two Engineer I positions. Currently, both Engineer I positions are vacant, and efforts are underway to reclassify them as Engineer II positions to create a more cohesive plan review team. Two Engineers from other programs are temporarily working on FOG engineering reviews until the vacancies can be filled. The program would be adequately staffed with five Engineer II reviewers; however, if the number of construction and Certificate of Use reviews continues to increase, additional staffing may be needed.

## 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.

In 2024 and 2025, five outreach events were hosted. DERM and RER plan to coordinate a minimum of six outreach events in 2026 focusing on providing guidance to facilitate the plan review and certificate of use review processes and on best management practices and compliance inspections on permitted facilities.

<b>YEAR</b>	<b>NON-RESIDENTIAL</b>	<b>RESIDENTIAL OUTREACH</b>	<b>TOTAL NUMBER</b>
<b>2014</b>	15	0	15
<b>2015</b>	20	0	20
<b>2016</b>	16	2	18
<b>2017</b>	12	0	12
<b>2018</b>	19	0	19
<b>2019</b>	17	2	19
<b>2020</b>	12	0	12
<b>2021</b>	16	0	16
<b>2022</b>	20	3	23
<b>2023</b>	16	0	16
<b>2024</b>	5	0	5
<b>2025</b>	5	0	5

*Table 5: Outreach Events*

### 3. FOG Control Program Review Committee

The effectiveness of the FCP and FCO are continuously evaluated by the stakeholders listed below.

- DERM Water and Wastewater Division
- DERM Director or Director's Designee
- RER Environmental Plan Review Division
- RER Director or Director's Designee
- Miami-Dade County Water and Sewer Department
- Volume Sewer Customers (Municipal Utility)

This annual activity will continue in the upcoming years to have a better understanding of the performance of this program.

For 2025, input was requested from the above stakeholders during the 46th Utility Roundtable on February 25, 2026, The City of Opa-Locka, Bal Harbour Village, University of Miami, City of North Miami, and the Town of Medley, provided the requested feedback. Their feedback is included in **Attachment 3** of this report.

DERM has taken into consideration the recommendations received from the Utilities that participated and will continue working towards a more rigorous FOG control program.

### 4. Proposed FCO and FCP Revisions

The FCO became effective in March 2018 and no changes are currently proposed. However, MDC is evaluating the FCP and might be presenting revisions to the same and a proposal to modify a few sections of the FCO. DERM and RER 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 to accomplish all FCP requirements.

A total of 3,813 annual routine inspections were conducted in 2025 from the 10,004 facilities requiring inspection. During the year 2025, MDC faced budgetary issues that resulted in a hiring freeze for vacant positions, limiting the ability to meet the inspection goals established in the FCP.

To achieve compliance with the inspection goals of the FCP, the compliance inspections team needs to be properly staffed. DERM efforts in 2026 will be focused on improving productivity with existing staff, recruiting and training personnel for all vacant positions and exploring options to increase the number of FTEs and supervisory staff assigned to the program. In addition, DERM will explore the feasibility of modifying the inspection frequency goal from every 12 months to 24 months, subject to EPA approval to better align program requirements with available resources while maintaining program effectiveness.

## 5. Conclusions

MDC implemented the Fats, Oils, and Grease (FOG) Control Program (FCP) to reduce FOG discharges to the Wastewater Collection, Transmission, and Treatment System (WCTTS), thereby minimizing FOG-related Sanitary Sewer Overflows (SSOs). Since the approval of the FCP and the FOG Control Ordinance (FCO) in 2018, MDC has made significant progress in enhancing key program components, including the design and review process for new grease interceptors, compliance and construction inspections, FOG manifesting (e.g., eManifest), and public outreach.

Utilities have implemented proactive cleaning of the collection system and some of them have installed Smart Cover units to prevent SSOs. Accelerated FOG maintenance costs rose from \$425,262 in 2024 to \$433,629 in 2025, which may be attributable to increased reporting by utilities. DERM will continue monitoring any trends in these costs and will continue making efforts to increase reporting on the costs associated with FOG accelerated maintenance.

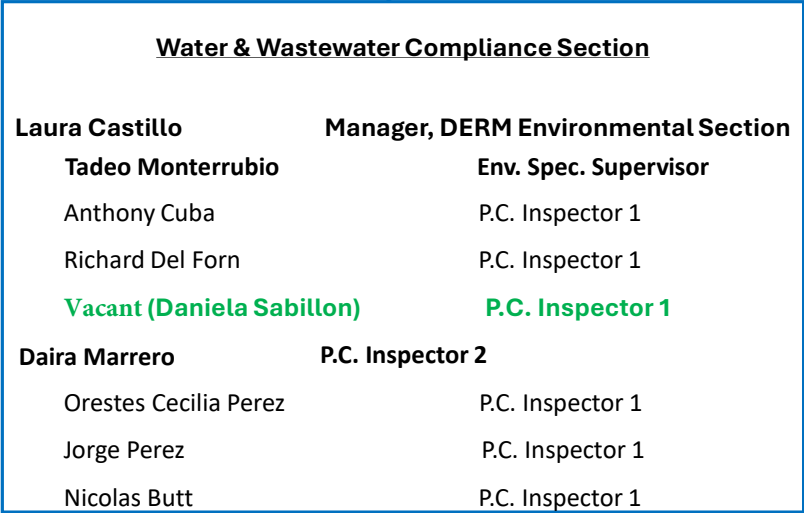
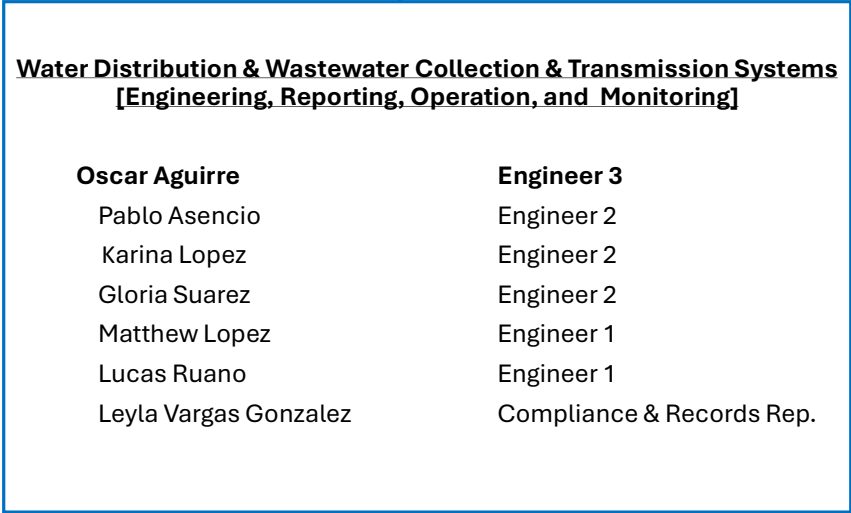
MDC will continue to make progress implementing the FCP and enforcing the FCO, and when applicable, propose changes to the U.S. Environmental Protection Agency (EPA) and the Florida Department of Environmental Protection (FDEP).

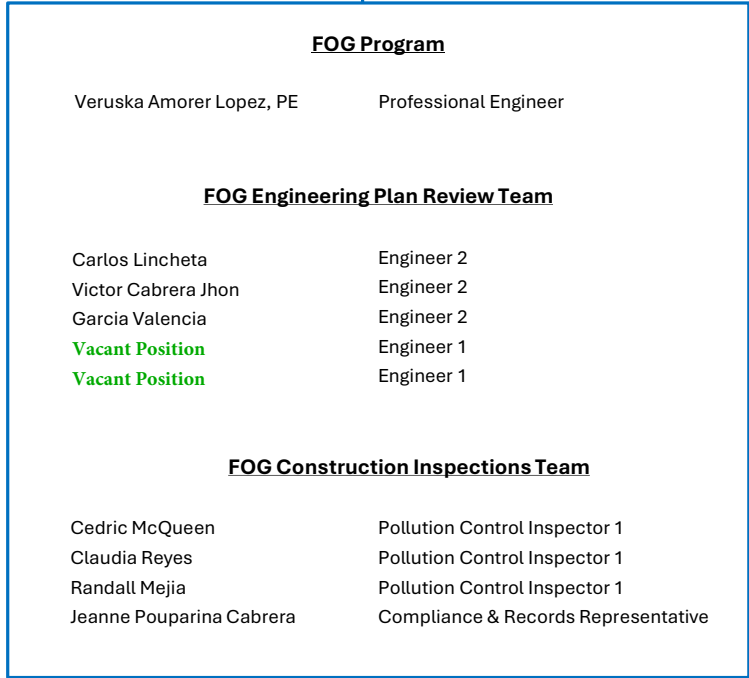
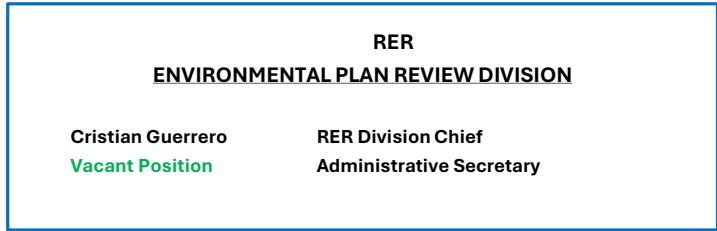
## ATTACHMENT 1

# Table of Organization

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**LEGEND:**  
 Vacancies in GREEN: (vacated by)





**LEGEND:**  
Vacancies in GREEN:

## ATTACHMENT 2

# Sample of Utility Accelerated FOG Maintenance (aFOG) Report

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**Accelerated FOG Maintenance (aFOG)<sup>1</sup> Report**  
**MDC Code Section 24-42.6(13)**

Utility Name: Miami-Dade Water and Sewer Department<sup>7</sup>

Month Reported: 10/01/25 to 10/31/25

Completed by: Wastewater Collections and Transmissions Line Division

Utility Code	Date of Maintenance mm/dd/yyyy	Maintenance Location (address)	ZIP code <sup>7</sup>	Latitude	Longitude	Causes <sup>2</sup>	Maintenance Initial MH #	Maintenance Final MH #	Length of Pipe Cleaned (Feet)	List of complete name of Chemicals added	Volume Recovered for Disposal (gallons) <sup>4</sup>	Liquid Waste Transporter DERM Permit LW-ST # <sup>7</sup>	Disposal Ticket No. <sup>5,7</sup>	Maintenance Cost <sup>8</sup> Labor	Maintenance Cost <sup>8</sup> Equipment	Maintenance Cost <sup>8</sup> Materials/Supplies	Total Maintenance Cost	
30	Date Completed	Address		Monitored Date X Location	Monitored Date Y Location		Upstream Manhole	Downstream Manhole	Line Segment Length (FL)					Labor Cost	Tool Cost	Material Cost	Total Labor Tools and Material Cost	
30	10/22/25	32 ST NW 5 AVE		918.319.8585	535.049.8	FOG	364	360	337.422447								\$706.95	
30	10/22/25	3480 MAIN HWY		905.045.395452	506.993.840897	FOG	502	502	181.					\$575.71	\$131.24	\$0.00	\$706.95	
30	10/22/25	1219 NW 2 ST		914.470.283	524.846.691499	FOG	1442	1442	240.					\$163.38	\$199.32	\$188.00	\$550.70	
30	10/22/25	690 NW 3 ST		<b>917,403.26</b>	<b>525,240.97</b>	FOG	62	1102	147.249898					\$163.38	\$199.32	\$188.00	\$550.70	
30	10/16/25	PS 0415 (4711 NW 181 TERR)		893.578.960789	583.894.873353	FOG	355	355	131.35656308					\$245.08	\$298.98	\$188.00	\$732.06	
30	10/16/25	PS 0415 (4711 NW 181 TERR)		893.647.671252	583.822.28499	FOG	462	462	131.16691527					\$135.63	\$149.49	\$0.00	\$285.12	
30	10/16/25	PS 0415 (4711 NW 181 TERR)		893.535.137192	583.443.284004	FOG	353	353	322.14214649					\$135.63	\$149.49	\$0.00	\$285.12	
30	10/16/25	PS 0415 (4711 NW 181 TERR)		893.520.112002	583.743.049725	FOG	354	354	278.58929202					\$135.63	\$149.49	\$0.00	\$285.12	
30	10/30/25	PS0553 (13780 SW 24 ST)		846.957.86	513.994.245	FOG	067	066	327.50863					\$5,517.07	\$2,192.32	\$0.00	\$7,709.39	
30	10/30/25	SW 108 CT & SW 155 ST		864.337.554	469.905.5705	FOG	002	001	164.400614					\$428.14	\$64.62	\$0.00	\$492.76	
30	10/10/25	155 NW 209 ST		917.706.94688	594.497.211995	FOG	23	23	401.18564176					\$202.23	\$221.78	\$0.00	\$424.01	
30	10/10/25	155 NW 209 ST		917.702.545	594.263.985	FOG	26	26	70.09745664					\$202.23	\$221.78	\$0.00	\$424.01	
30	10/10/25	155 NW 209 ST		917.439.282127	593.837.328506	FOG	11	11	261.9366028					\$202.23	\$221.78	\$0.00	\$424.01	
30	10/10/25	155 NW 209 ST		917.450.219176	593.583.381005	FOG	10	10	234.3546726					\$202.23	\$221.78	\$0.00	\$424.01	
30	10/10/25	155 NW 209 ST		917.527.663501	594.696.669278	FOG	24	24	344.64487364					\$202.23	\$221.78	\$0.00	\$424.01	
30	10/10/25	155 NW 209 ST		917.365.2165	593.974.165	FOG	32	32	10.67043257					\$202.23	\$221.78	\$0.00	\$424.01	
30	10/10/25	155 NW 209 ST		917.299.1265	594.694.9375	FOG	25	25	112.45510578					\$202.23	\$221.78	\$0.00	\$424.01	
30	10/10/25	155 NW 209 ST		917.375.088645	593.960.247324	FOG	47	47	128.06623307					\$202.23	\$221.78	\$0.00	\$424.01	
30	10/15/25	21151 NW 2 AVE		917.070.3955	595.786.06555	FOG	4	4	16.29546212					\$97.63	\$104.58	\$0.00	\$202.20	
30	10/15/25	21151 NW 2 AVE		917.076.187814	595.642.33499	FOG	2	2	222.05237839					\$97.63	\$104.58	\$0.00	\$202.20	
30	10/15/25	21151 NW 2 AVE		917.070.0285	595.765.5755	FOG	3	3	24.74178897					\$97.63	\$104.58	\$0.00	\$202.20	
30	10/15/25	21151 NW 2 AVE		917.141.010581	595.492.124622	FOG	1	1	141.87147463					\$97.63	\$104.58	\$0.00	\$202.20	
30	10/20/25	162 ST COLLINS AVE		845.963.033268	589.976.945566	FOG	178	178	140.94470988					\$156.20	\$199.32	\$0.00	\$355.52	
30	10/24/25	6601 COW PEN DR		883.886.174004	576.065.991627	FOG	132	132	384.78812021					\$234.30	\$298.98	\$0.00	\$533.28	
30	10/24/25	6601 COW PEN DR		884.198.489499	576.059.4265	FOG	131	131	240.10056741					\$234.30	\$298.98	\$0.00	\$533.28	
														4995.2	\$10,268.45	\$6,753.59	\$564.00	\$17,586.04

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## ATTACHMENT 3

# Stakeholder Feedback

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**FOG Control Program  
2026 Stakeholder Feedback**

**Bal Harbour Village**

**City of Opa-Locka**

**University of Miami**

**City of North Miami**

**Town of Medley**

**What’s your primary concern regarding the FOG Control Program?**

Amount of grease being dump down the drain by residents

Resolving Sewer Overflows

- Green cards of FSE Operators are currently maintained in non-digital format, creating a risk of lost, damaged, or inaccessible records during audits or inspections.
- Folio number records for approved (GDOs) are not consistently kept current or accessible, increasing the risk of compliance gaps.
- Sometimes records are not organized by facility or linked to inspection history, resulting in delays and inefficiencies during any new approval process

Our primary concern involves business owners in the City operating with unpermitted grease traps.

We believe that the municipalities don’t have sufficient manpower to be able to keep the FOG control program in check.

**If you could change one aspect of the program, what would it be?**

An Ordinance holding residents accountable collecting their own oil / grease with an approved 5-gallon container and, the County waste department collecting on a bi-weekly basis.

Better Treatment

- Maintain digital backups of all FSE Operator green cards in a centralized, audit-ready archive.
- Eliminate Double-Reporting
- Current workflow requires both, haulers, FSE operators or property owners (UM) to submit reports independently.
- Establish a single reporting workflow with one digital record per pumping event.
- Transitioning from a violation-driven enforcement/approach toward more proactive inspection with FSE Operators.
- Prioritize scheduling coordination and compliance forecasting with FSE operators.
- Give special attention to multi-unit operators who manage multiple food service locations on campus.
- Identify at-risk interceptors before violations occur.

Having the ability to track the FOG permitting process—or integrating it into the sewer extension permit approval process rather than keeping it separate—would be beneficial. Currently, the FOG permit is often issued after the project has already received approval to construct the sewer system, with the condition that a copy of the FOG permit must be submitted prior to obtaining the CO.

The county should provide the municipalities with the legal jurisdiction to be able to implement county enforcement and Industrial Waste business licenses removals.

**FOG Control Program  
2026 Stakeholder Feedback**

**Bal Harbour Village**

**City of Opa-Locka**

**University of Miami**

**City of North Miami**

**Town of Medley**

**Are the current PMs or KPIs effective indicators?**

Yes

N/A

Yes

As mentioned above, the timeliness of permit issuance could be improved. Additionally, does the program track the number of sewer backups or SSOs that are directly caused by FOG blockages? Does it also monitor, or have a mechanism to monitor, the percentage of businesses operating with unpermitted or non-compliant grease traps?

Yes however, they can be improved

**Should we add new PM/KPI?**

Yes, DERM requesting all Utilities to provide quarterly copy of Flyers to resident via the County water bill reminding residents on the No pouring oil / grease down the drain.

N/A

Yes. If they are not already included, the program could benefit from tracking the unpermitted/non-compliant grease trap rate, inspection coverage and compliance rates, as well as participation in FOG trainings or workshops.

- County assistance for all municipalities by sharing the Industrial Waste license and information because many manufacturers also process food and create FOG into the SS system of municipalities.
- Grease-Related Sewer Blockages; to be reduced <10% of total blockages caused by grease.
- Sanitary Sewer Overflows (SSOs) Caused by Grease; to be reduced <10% of total blockages caused by grease
- Food Service Establishment (FSE); to have 95 to 100% registration.
- Inspection Coverage; 2-4 times annually of the food services establishments.
- Grease Interceptor Maintenance 90 to 100% compliance.
- Grease Repeat Violator Rate < 10 %.
- Inspections per inspector; Target – 400-700 per yr.
- Inspection completion rate > 95 %

**FOG Control Program  
2026 Stakeholder Feedback**

**Bal Harbour Village**

**City of Opa-Locka**

**University of Miami**

**City of North Miami**

**Town of Medley**

**Do you have any comments or suggestions?**

An Ordinance, requesting all restaurants, to submit to all Cities, records of cleaning their Grease Traps on a quarterly basis or semi-annual.

Yes, I recommend trying in-pipe technology

- Refreshed FOG awareness training is needed for dining and facilities staff, especially during onboarding.
- Observation: SSO risks originate from improper disposal practices at the source kitchens, prep areas, and loading docks.
- Training material from RER/DERM what FOG is, why it matters, proper disposal procedures, and how to report concerns.
- All catering and food vendor contracts should include explicit FOG compliance clauses.
- Define clear obligations for grease management, disposal records.
- Establish remedies for non-compliance, including contract penalties or removal from approved vendor lists.

No

Improve cooperation between the county & the municipalities.

**Since its implementation in 2016, how has the FOG Control Program impacted the performance of the Sanitary Collection System in your utility?**

Once again, oil and grease continue being dump into the sanitary sewer system throughout the Miami-Dade County even with overflows of grease traps etc..

We had to address how serious it is, so we had to go out there and get into a contractual agreement with vendor call In-Pipe technology, that us working excellent in our FOG control program.

- Avoiding risk in sewer overflow events directly linked to grease accumulation.
- Increased FSE Operator Accountability: Formal inspection and manifest requirements have raised awareness of proper grease management practices across campus FSE Operators.
- Strengthened Regulatory Relationship: UM has demonstrated compliance with RER/DERM and Miami-Dade WASD requirements reducing the University's exposure to enforcement/violation actions.

It helps identify non-compliant businesses we can't always track independently.

The Town has had a great experience in implementing the FOG program and has worked well with DERM. However, cooperation between the county needs to be improved.