



Best Management Practice (BMP) Checklist for Mobile Food Vendors

This Best Management Practice (BMP) program is intended to assist Mobile Food Vendors (MFV) to comply with federal, state, and local waste disposal regulations. This document lists both required and recommended BMPs for proper handling and disposal of wastewater generated by MFVs. It also includes guidelines to protect storm water runoff from pollutants.

II. BMP Requirements for Compliance with Title 11-C, Chapter 12 "Sewer Use" Ordinance

Operators of MFVs discharging wastewater to the sanitary sewer system **are required to implement** the practices listed in this section. If a MFV operator chooses to discharge process wastewater (e.g. washing dishes and/or food prep liquids/foods) to the City of Tulsa's sanitary sewer system, the wastewater must first pass through an appropriate grease interceptor or the operator must periodically monitor the discharge at a frequency of at least once every three months. In no case shall the operator allow wastewater to be discharged to the sanitary sewer system containing oil & grease in excess of 100 mg/l.

1. Application for Certificate of BMP Approval – Prior to the issuance of a Certificate of BMP Approval, an operator of a mobile food facility must first submit a completely filled out wastewater disposal plan with a signed attestation and BMP adherence statement. Call Water Quality Assurance Office, (918) 591-4378, for blank copies of the disposal plan and/or submittal information. The required information is to be submitted by email, fax, or mail to Water Quality Assurance Office contact information below:

Water Quality Assurance Office
Pollution Prevention Supervisor
4818 South Elwood Avenue
Tulsa, OK 74107-8129
Fax- (918) 591-4388
Main Office- (918) 591-4378

2. Employee Training –

- All facility employees are to be trained on and made aware of the requirements and recommendations of this BMP program. They must know the designated location to where all wastewater must be discharged.
- If the discharge location is to a grease trap or interceptor, they must have knowledge of the function of a grease trap and/or interceptor.
- New employees shall be initially trained within 1 week of employment. Additionally, each employee shall receive periodic refresher training at intervals not to exceed one year.
- Documentation of this training shall be kept at the facility and readily available for review by authorized representatives of the City of Tulsa.
- The City of Tulsa may provide training or training guidance material upon request.

3. Structural Controls –

- Signs that instruct employees on proper BMPs as outlined in this program shall be conspicuously posted in the kitchen area, particularly near sinks and grills.
- These signs are to be written in language(s) understood by all employees.

4. Cleaning & Maintenance –

- Wash dishes either within the mobile unit, or at an associated commercial kitchen or commissary.
- Wipe and scrape food scraps, sauces, and residues from plates, trays, cooking utensils, pots, and pans into the trash before washing.
- Minimize the usage of soaps and degreasers.

- Recycle waste cooking oil and other grease products. Never pour these substances down any drains.
- Establish a schedule for collecting and cleaning grease-laden areas (e.g. fryers, vents, grills, etc.)
- Cleanup spills immediately.
- Dry sweep surfaces and floors prior to washing and mopping. Place sweepings in trash receptacles.
- Grease interceptors shall be pumped and cleaned by a City of Tulsa Permitted Grease Hauler on regular basis. Interceptors must be cleaned immediately, whenever:
 - The clear liquid contents of the interceptor, as measured by a sludge judge, is less than or equal to 75% of the interceptor's capacity (25% grease and solids combined or greater), or
 - A sample collected immediately downstream of the interceptor indicates the presence of visible FOG or solid material(s), or
 - The analytical results of a sample taken immediately downstream of the interceptor indicates an O&G concentration of more than 100 mg/l (this is a violation, it is recommended to clean out above 80 mg/l), or
 - When instructed by an authorized representative of the City of Tulsa.

5. Inspections & Record keeping All records of activities required by this BMP (training records, inspection and maintenance logs and manifests) are to be kept at the facility for a minimum of three years and shall be readily available for review by representatives of the City of Tulsa.

- Inspect small grease interceptors at least weekly and large interceptors at least monthly.
- A representative of the food-handling establishment should witness the grease trap/interceptor pumping and cleaning. Then once the contents have been removed, visual inspection for broken/missing baffles or any other defects within the interceptor. Observed problems must be addressed as soon as possible.
- Maintain a log of the inspections and maintenance activities performed per items in this section.
- Material Safety Data Sheets for all chemicals, soaps, cleaners and biological products used at the facility are to be maintained at the facility in an organized and accessible manner.

III. BMP Requirements for Compliance Title 11-A, Chapter 5 "Pollution" Ordinance

Per this Ordinance, only storm water runoff can be discharged to the storm sewer. The following BMPs are required to insure compliance with the Pollution Ordinance.

1. **Spills** – Spills must be cleaned up immediately. Clean up options should include absorbing the spilled pollutant. Dry pollutant must be disposed of into the trash and liquid waste into the sanitary sewer (if allowed by Title 11-C). If pollutants entered the storm sewer, notification must be made to the Mayor's Action Line at (918) 591-2100.
2. **Outside washing** - At no time shall pollutants be discharged to the storm sewer as a result of outside washing. Outside washing can only be conducted on those items that cannot be moved inside, such as parking lots, sidewalks and buildings. All other items, such as vent hoods, filters, etc. must be washed inside or at another appropriate location with the discharge directed to the sanitary sewer.
 - Use water only** (within 10 degrees Fahrenheit of ambient air temperature) - The runoff must be filtered through an absorbent boom prior to entering the storm sewer. This prevents oils and other hydrocarbons from entering the storm sewer. Prior to outside washing, free liquids (i.e. anti-freeze, oil, gasoline) or solid pollutants (i.e. cigarette butts, trash, sediment) must be removed from the wash area. This can be accomplished through the use of absorbent materials for liquids and by dry sweeping or vacuuming for solids.
 - Use chemicals with water and/or hot water** - The runoff must be captured and disposed of into the sanitary sewer. This discharge must comply with Title 11-C. Chemicals include those considered biodegradable.
3. **Outside fryer oil** containers must be kept covered and away from all storm drains.
4. Any grease spillage outside the facility is to be immediately reported to the City of Tulsa's Quality Assurance Section at (918) 591-4378. All possible steps shall be taken to clean up the spill and minimize the potential of entering the storm sewer system.

IV. BMP Recommendations

- In order to ascertain the effectiveness of BMP practices, it is highly recommended that facilities voluntarily collect samples of the effluent of their traps and/or interceptors. Those samples should be submitted to an ODEQ certified laboratory for Oil & Grease analysis. The sampling and analysis should be performed utilizing procedures in accordance with 40 CFR Part 136.
- Mop grease-laden areas with a disposable mop head and discard it into a trash receptacle.
- Solicit employee's opinions and suggestions for BMP program improvements. Give employees incentives to follow and go beyond the requirements of this BMP.
- Minimize or eliminate the use of garbage disposals. Use trash receptacles instead.
- Educate all employees on grease-related maintenance costs and emphasize the need to keep grease from ever getting into the sink.
- Show all employees the location of the grease interceptor and, if possible, show them the interceptor after it has been cleaned.