

To: City of Toronto Council Members
From: George Pearson, georgejpearson@microspringintl.com
Subject: Comments for 2015.PW9.5 on December 9, 2015 City Council

We would like to have the opportunity to present our argument to the city council regarding B481.4.6.1.3 of the proposed city by-law that states:

“An operator of a food services facility shall not use or permit the use of chemical agents, enzymes, bacteria, solvents, hot water, or other agents to facilitate the passage of FOG through a grease interceptor.”

We agree with the proposed by-law, however, not permitting the use of bacteria is counter productive to the goals of the city and environmental initiative programs. Many drain additives contain surfactants and emulsifiers that “liquify” Fat’s, Oil’s, and Grease from food service kitchens and pass it through grease traps to eventually enter the collection system. Bacteria products do the opposite. Bacteria are living organisms that consume F.O.G., digest it, and release a by-product of water and carbon dioxide. Bacteria products permanently remove F.O.G. from the collection system, not pass it through.

Currently, plumbers hydro-jet drain lines to remove grease buildup. Hydro-jetting works by using high pressure water to blast the grease from the drain lines and pass it through to the collection system. The grease will resolidify in the city sewer lines to only be hydro-jetted again. The grease will typically enter a pumping station where it collects, producing operational problems to the pump station if it isn’t removed and transported out. If the FOG is allowed to enter in the wastewater treatment plant, it will disrupt the microbial balance of the treatment plant and will require expensive measures to bring the plant back into balance. Wastewater treatment plants work by growing the natural bacteria in the wastewater to degrade the organics. We use the same bacteria strains to treat the source of the problem.

Bacteria products can work with the city’s initiatives to reduce total FOG from the collection system and help make our wastewater treatment plants more efficient. We currently work with many food production facilities and sewer authorities to help reduce pollutants entering into the collection system. As an example, we were asked to help a food production facility in St. Marys, Ontario to reduce their excessive FOG pollutants. Before we treated, the FOG measurement was 7914 mg/L leaving the facility. After treatment, the FOG measurement was reduced to 7mg/L. They are still a customer and have been a loyal customer for the last three years.

We feel that prohibiting the use of bacteria products prevents any opportunity for the City of Toronto to use the latest environmental technology to help solve pollution problems.

Sincerely,

George Pearson
President