



# TNRCC REGULATORY GUIDANCE

Small Business and Environmental Assistance Division  
RG-389  
October 2001

**SUBJECT: Answers to Common Questions about  
Waste from Grease Traps, Grit Traps,  
and Septic Tanks**

## **Purpose**

This publication is intended for generators of waste from grease traps, grit traps, and septic tanks, including individuals with septic tanks at their homes. If you generate any of these types of waste, it is important for you to know and comply with regulations because you are responsible for managing the waste—from the time it is generated, transported, and processed, to the time of final disposal.

This guide answers many frequently asked questions about applicable waste regulations of the Texas Natural Resource Conservation Commission (TNRCC). This publication is for general guidance only. It does not take the place of any state or local regulations. In the text, "I" refers to the business, individual, or other entity generating the waste.

## **Grease Trap Waste**

### **Am I required to have a grease trap?**

A grease trap is required for any facility, including municipalities and state and federal entities, whose business activity is the source of cooking grease or oil in its sewage—such as restaurants, cafeterias, and food processing plants—and is located in an area that has adopted a plumbing code. Plumbing codes do not allow discharge of grease into the sewer because it blocks the lines.

### **Who regulates my grease trap?**

Grease traps are regulated by the Texas Department of Health (TDH), your local wastewater utility, or both. The TNRCC regulates the pumping (evacuation), transportation, and disposal of all grease trap waste. The TDH regulates the recycling of grease trap waste (*brown grease*) under the Texas Renderers Licensing Act. This is a type of disposal. (See last page of this publication for contact information on the TDH Bureau of Food & Drug Safety, Retail Foods Division.)

### **Do I have to register my grease trap?**

Grease traps do not need to be registered with the TNRCC; however, your local authorities may require local registration.

### **Who can pump my grease trap?**

Only transporters registered with the TNRCC can legally pump and transport grease trap waste. You can call your local TNRCC office for a list of registered transporters in your area.

### **May I dispose of my own grease trap wastes?**

You must be registered with the TNRCC as a transporter and meet all of the reporting requirements to haul waste from grease traps. All *liquid waste*—including grease trap, grit trap, and septic tank wastes—must be transported by registered haulers. TNRCC rules do not apply to yellow grease from fryers that will be rendered. However, you must comply with TDH requirements concerning yellow grease.

## **Grit Trap Waste**

### **Am I required to have a grit trap?**

Grit traps are required for permanent car washes that are located in an area that has adopted a plumbing code. Grit cannot be discharged into the sewer because it blocks the lines and damages city pumps.

### **Who regulates my grit trap?**

Grit traps are regulated by your local plumbing code and your local wastewater utility. The TNRCC regulates the pumping (evacuation), transportation, and disposal of the waste from grit traps.

### **Do I have to register my grit trap?**

Grit traps do not need to be registered with the TNRCC; however, your local authorities may require local registration.

### **Who can pump my grit trap?**

Only transporters registered with the TNRCC can legally pump and transport grit trap waste. You can call your local TNRCC office for a list of registered transporters in your area.

Grit trap waste from a car wash may also be dried on site and properly disposed of according to state rule—Title 30 of the Texas Administrative Code, Section 330.4(p). Any other treatment of these wastes must be authorized by the TNRCC. (See the last page of this publication for information about finding the rules on the TNRCC Web site.)

### **May I dispose of my own grit trap wastes?**

Most self-serve car washes dry their own grit trap waste using evaporation drying beds. While the state of Texas does not regulate specifications for

these drying beds, it does require that you *not allow* water from the drying bed to escape into the surrounding area or storm drains.

Because grit trap waste may be contaminated with benzene, lead, total petroleum hydrocarbons, and other harmful materials, tests are normally required before a landfill will accept these wastes. Not all landfills can accept grit trap waste, so call your local authorities first.

## Septic Tank Waste

### Who regulates my septic tank?

Septic tanks are regulated by the TNRCC directly, or by a TNRCC-authorized agent from one of your local governments. The TNRCC regulates the pumping (evacuation), transportation, and disposal of the waste from septic tanks.

### Do I have to register my septic tank?

The TNRCC or a TNRCC-authorized agent from one of your local governments must issue a permit for your septic system before it is installed, and then inspect the septic tank when installation is complete. Permits are also required for existing systems that are upgraded or repaired. (See the last page of this publication for contact information about septic tanks, also known as *on-site sewage facilities*, or OSSFs.)

### Who can pump my septic tank?

Only transporters registered with the TNRCC can legally pump and transport septic tank waste. You can call your local TNRCC office for a list of registered transporters in your area.

## General Information

### What information is required on a registered transporter's trip ticket?

The TNRCC requires the following information to be on a transporter's trip ticket—a paper trail on the waste that is also called a *manifest*.

#### *Generator Information*

- your name, address, and phone number;
- type of waste generated (for example, grease trap or chemical toilet);
- trap or tank capacity and the type and amount of waste collected;
- date of service; and
- your signature verifying the information and approving the disposal site to be used.

#### *Transporter Information*

- transporter's name, address, and phone number;
- transporter's TNRCC registration number;
- transporter's city or county permit number, if required;

- gallons transported; and
- driver's name and signature.

### ***Disposal Site Information***

- disposal site's name and permit number or registration number;
- disposal site's address;
- date and amount of waste received; and
- site representative's name and signature.

### **How do I know that my grease or grit trap waste or septic waste is going to an authorized site?**

As a generator, you are responsible for disposal of the waste you generate at your facility. Contact the disposal site facility listed on the returned copy of the trip ticket to verify disposal site authorization and receipt of waste.

You also have the option of choosing the disposal site for your wastes. Check with the transporters in your area, and choose one who is registered to use the disposal facility that you wish. You can verify their registration when they pick up the waste because they are required to keep a copy of the registration in their truck.

### **Can a transporter pump my septic tank and my grease trap in the same load?**

Transporters cannot mix wastes with different characteristics, except in very rare cases. Most facilities are not authorized to store, process, or dispose of these mixed wastes either. If you plan to recycle grease trap waste, it certainly cannot be mixed with other wastes. Grease trap waste that is designated for recycling is called *brown grease*. Transporters of brown grease must be registered under 30 TAC, Section 312.

Please note that the TNRCC transportation regulations *do not apply* to used cooking oils from fryers and similar sources that do not come from grease traps. This is called *yellow grease*, and it is rendered and recycled. It is governed by TDH rules. Yellow grease must be stored in a special container for pickup by the recycler—it cannot come from a grease trap, because then it would be brown grease.

A recycler of yellow grease does *not* need to be registered under 30 TAC, Section 312. (See last page of this publication for contact information on the TDH Bureau of Food & Drug Safety, Retail Foods Division.)

### **If a registered transporter hauls my grease, grit, or septic tank waste, am I still responsible for the proper disposal of the waste?**

Yes. If your waste is illegally dumped, you are considered at fault, and you could face enforcement proceedings. Remember, as a generator you must ensure that your waste is disposed of at a registered disposal site. The generator is always liable for any cleanup costs linked to an improper

disposal site. In addition, an early cleanup will limit the spread of contamination and decrease the costs for remediation.

### **Tips for Controlling Your Liability**

- Carefully select a registered transporter.
- Verify the information on the final trip ticket: receipt of proper amount, disposal at the correct facility, signature of disposal site employee.
- Promptly clean up any waste spilled.
- Report problems to the TNRCC as soon as possible.

### **What does it cost to have my trap or tank pumped?**

Costs vary, depending on such factors as choice of transporter, distance to the disposal site, frequency of pumping, volume pumped, disposal site charges, and testing requirements. Keep in mind that the TNRCC has no jurisdiction over the prices. They are the transporter's decision.

### **How often should I have my trap or tank pumped?**

Frequency of pumping depends on the size of your trap or tank and the amount of waste you generate. A local plumber may be able to help you with calculations. You should arrange to have the trap or tank pumped before it becomes full. This will prevent problems that might arise if you cannot get it pumped when you planned. You can also avoid the added cost of fixing problems caused by full tanks, such as clogged traps, lines, and tanks. See 30 TAC, Section 285 for a recommended pumping schedule for septic tanks. (The last page of this publication includes information about finding the rules on the TNRCC Web site.)

### **What happens if my waste is disposed of improperly?**

The following problems may be created:

- foul (potential nuisance) odors;
- breeding grounds for flies and vermin;
- salmonella and botulism poisoning;
- exposure to infectious diseases for those who come in contact with these wastes;
- soil contamination;
- water contamination from seepage into well fields, or when waste is dumped into creeks and other bodies of water;
- clogged sewer lines; and
- loss of aquatic life.

Remember, as the generator **you are liable for improper disposal.**

## What are my responsibilities as a generator?

As a generator of waste from grease or grit traps or septic tanks, your responsibilities include:

- properly maintaining the trap(s) located within your sewer service lines;
- ensuring the proper handling and disposal of the wastes you generate;
- maintaining a paper trail on your waste (check with local authorities to find out how long to keep these records); and
- taking any feasible steps to reduce the amount of waste you generate.

### Contact Information

#### Texas Natural Resource Conservation Commission

Small Business and Local Government Assistance

(SBLGA) Hotline ..... 1-800-447-2827

Transporter Registration ..... 512/239-6832

Environmental Complaint Hotline ..... 1-888-777-3186

On-Site Sewage Facilities (septic systems) ..... 512/239-0914

Web site: [www.tnrcc.state.tx.us](http://www.tnrcc.state.tx.us). Click on “Rules” for a link to the Texas Administrative Code and other Texas rules and laws. Or click on “Index” and choose a subject, such as: “On-Site Sewage Facility Installation;” or “Municipal Solid Waste,” then choose “Permits,” and “Liquid Waste Processing.”

#### Texas Department of Health

Bureau of Food & Drug Safety ..... 512/719-0222

Retail Foods Division ..... 512/719-0232

Web site: [www.tdh.state.tx.us](http://www.tdh.state.tx.us)

**Texas State Board of Plumbing Examiners** ..... 512/458-2145

Web site: [www.tsbpe.state.tx.us](http://www.tsbpe.state.tx.us)

**Uniform Plumbing Code** ..... 1-800-854-2766