

COUNCIL ACTION FORM

SUBJECT: APPLICATION OF THE FOG LIMIT IN THE AMES MUNICIPAL CODE

BACKGROUND:

The City's adopted FOG Control Program includes a requirement for Food Service Establishments (FSE's) to demonstrate their compliance with the program every six months. One of the ways they can demonstrate compliance is by cleaning their grease interceptors frequently enough that, *on average*, their interceptor is "...25% or less..." filled with floating grease or settled solids prior to each cleaning. (See Chapter 28.308)

Sample Calculation

Settled Solids, inches (A)	Floating Grease, inches (B)	Total Depth of Interceptor, inches (C)	Percent Full (A+B)/C*100
4"	6"	50"	20%

In the recent compliance period, a FSE cleaned their interceptor 7 times. Their measurements and calculations were very similar to the example shown above, with the volume of solids and volume of grease each being measured to the nearest inch. The average of their seven cleanings was 25.3%.

It is staff's interpretation that the precision of the readings, having been taken to the nearest inch, are not precise enough to warrant calculating the average value to three significant figures (XX.X%). Staff intends to establish an administrative practice whereby the calculated average is rounded to only two significant figures (XX%) using the common statistical convention of rounding values of 25.49% or less down to 25% and rounding values of 25.50% or greater up to 26%. In the situation at hand, the calculated average of 25.3% would be rounded down to 25%, and the FSE would be deemed to be in compliance with the program (and thus not subject to the FOG surcharge for the next six months).

Since this is the first time this situation has occurred under the relatively new FOG Control Program, staff would like to confirm the City Council's support for this approach.

ALTERNATIVES:

1. Concur with staff's approach of rounding the calculated average value up or down to two significant figures using common statistical rounding conventions.

2. Direct staff to not round the calculated average, making any calculated value that is greater than 25.00% a failure to comply with the requirements of the FOG Control Program and making the FSE subject to the FOG surcharge in the following six months.

CITY MANAGER'S RECOMMENDED ACTION:

Staff believes that calculating the average "percent full" value to a fraction of a percentage point is not statistically valid, and that the average value should be rounded to two significant figures; more specifically, the value should be rounded up or down to the nearest whole percentage point. Therefore, it is the recommendation of the City Manager that the City Council adopt Alternative No. 1 as stated above.