

Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

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SUBJECT: REGULATORY ADVISORY ON TITLE 5 AND PLUMBING CODE REGARDING EXTERIOR GREASE TRAPS

DATE: October 24, 2011

As a result of correspondence with the Massachusetts Association of Health Boards, (MAHB), Massachusetts Health Officers Association (MHOA), Board of State Examiners of Plumbers and Gas Fitters and direct communication with various Health Agents, DEP has been made aware of the confusion among health professionals and plumbing inspectors over the multiple standards applicable to external grease traps installed as part of Title 5 systems. DEP has met with representatives of the Board of State Examiners of Plumbers and Gas Fitters to help clarify the jurisdictional issues on regulatory oversight of exterior grease traps installed as part of Title 5 systems. Based on these discussions and review of applicable regulations, it has been determined that both the Plumbing Code and Title 5 need to be complied with when designing and installing exterior grease traps as part of a Title 5 on-site wastewater system.

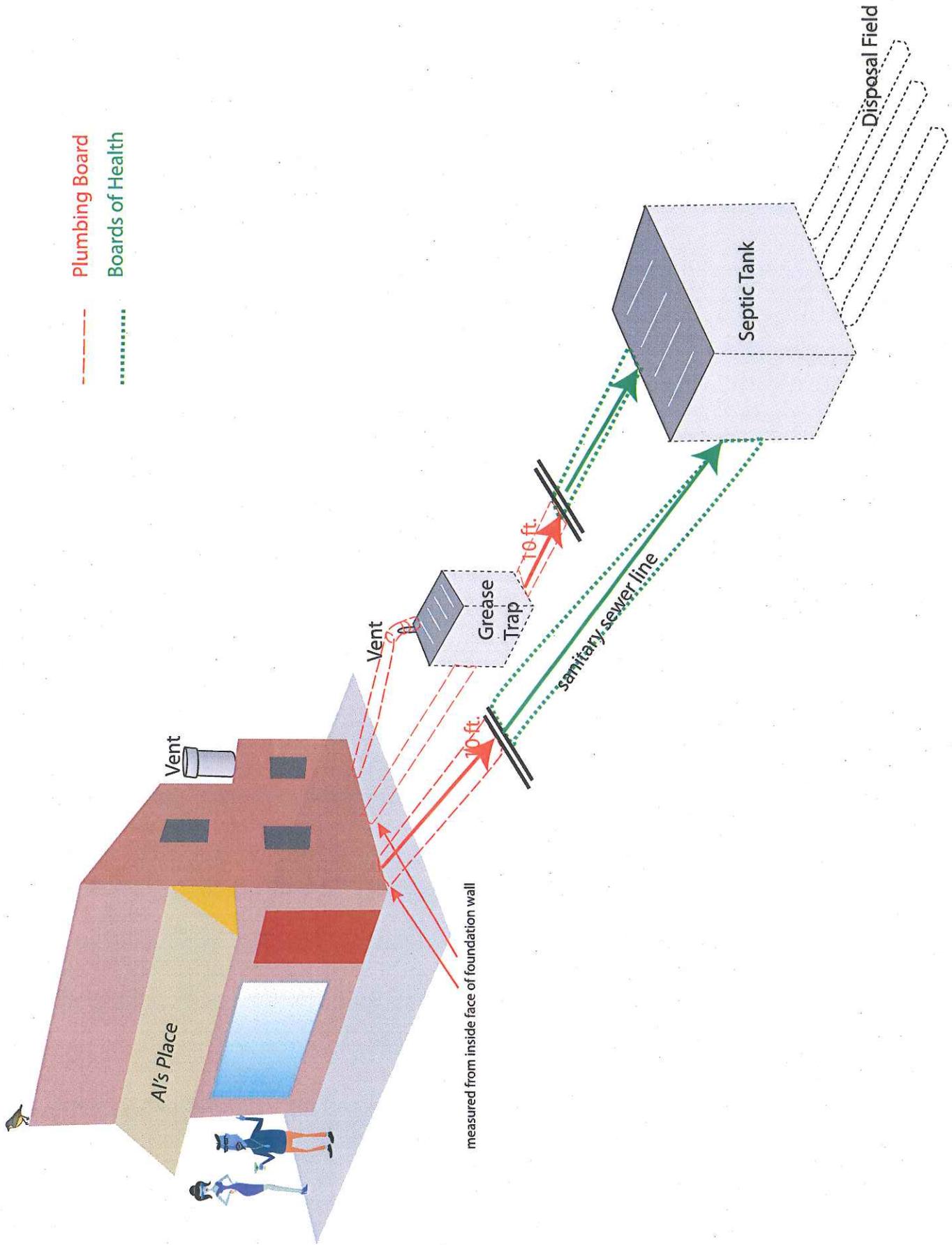
The Plumbing Code at section 248 CMR 10.09(3) states that “[w]hen an outside grease interceptor is installed, the entire installation within the property line shall comply with 248 CMR...”. Confusion over whether the Plumbing Code applies to grease traps installed as part of a Title 5 system apparently stems from language in 248 CMR 10.09 (2) (d), under a section entitled “Grease Traps and Interceptors When Installed Inside of Buildings”, that states in applicable part: “.. in unsewered areas refer to 310 CMR 15.00: The State Environmental Code, Title 5: Standard Requirements for the Siting, Construction, Inspection, Upgrade and Expansion of On-Site Sewage Treatment and Disposal Systems and the Transport and Disposal of Septage, relative to the grease removal at installation from which large quantities of grease can be expected”. This reference to Title 5 requirements for grease traps has led some to believe that since the approving authority under Title 5 lies with the local BOH that a BOH permit is all that is required.

The attached chart defines the area of oversight between the local Board of Health and the local Plumbing inspector.

It is recommended that local health officials and plumbing inspectors work together to establish procedures for the review, approvals and installations of exterior grease traps installed prior to septic systems, including the use of appropriately licensed individuals acting pursuant to both BOH and plumbing permits. This advisory replaces a previous interim advisory issued in the Spring of 2011. Please note that this is an advisory only and is not meant to contradict any laws or regulations.

Plumbing Board

Boards of Health



measured from inside face of foundation wall