



The City of



Public Utilities

FACT SHEET

## Food Waste Liquefiers

### What is a liquefier?

A liquefier is a device that converts food waste into a highly-concentrated liquid slurry through grinding, shredding, or agitating the waste to encourage microbiological activity and decomposition. Most liquefiers are designed to discharge the slurry into the local sewer system. These systems can also be referred to as “bio-digesters” or “wet” systems and tend to be installed by businesses and institutions that generate large amounts of food waste, such as restaurants, hotels, grocery stores, universities, and prisons.<sup>i</sup>

### Why are liquefiers installed?

These devices are marketed as an alternative to discarding food waste in the trash, which then would often end up in a landfill. The ‘diversion’ of this specific waste stream out of California landfills is required by a number of different legislative initiatives in recent years, including AB 1826 of 2014<sup>ii</sup>. AB 1826—the ‘Mandatory Commercial Organics Recycling’ legislation—requires businesses generating organic waste (including food waste) to recycle that waste instead of just throwing it in the garbage. As a result, businesses regulated by AB 1826 may be approached by vendors selling liquefier-type devices in an effort to process the waste on-site and simply discharge the slurry into the sewer system. According to CalRecycle, this approach only counts as recycling if the local sewer agency recycles solids it removes from the wastewater stream, like the City of San Diego is currently doing.<sup>iii</sup>

### Why are liquefiers a problem in the City of San Diego?

The City’s main wastewater facility—the Point Loma Wastewater Treatment Plant (PLWWTP)—has strict requirements governing the removal of certain pollutants before treated wastewater is discharged out of its ocean outfall<sup>iv</sup>. These requirements come from federal law and cannot be violated without risking an expenditure of approximately \$2 billion to upgrade the treatment process at the facility<sup>v</sup>. Unfortunately, if large numbers of liquefiers begin discharging to the sewer system, their combined effluent concentrations and characteristics would likely be beyond the capacity of the current plant to process effectively, leading to violations of the facility’s permit.





Moreover, most liquefier discharges would be ‘industrial wastewater<sup>vi</sup>’ discharges under existing Municipal Code and would require a Permit for Industrial Waste Discharge from the City<sup>vii</sup>. In addition, discharges from facilities engaged in preparing food for consumption by the public would also require a permit for Food Establishment Wastewater Discharge<sup>viii</sup>. The City will deny issuance of either of these permits if a proposed discharge would threaten PLWWTP’s compliance with its National Pollutant Discharge Elimination System (NPDES) permit<sup>ix</sup>.

**It is important to note that liquefiers themselves are not a problem for the City’s infrastructure if they do not discharge to the sewer.** They may be installed if their effluent is transported directly to a treatment facility that can process it, using a means other than the sewer system.

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<sup>i</sup> <https://www.calrecycle.ca.gov/Organics/Food/Commercial/Liquefiers/>

<sup>ii</sup> [http://www.leginfo.ca.gov/pub/13-14/bill/asm/ab\\_1801-1850/ab\\_1826\\_bill\\_20140928\\_chaptered.pdf](http://www.leginfo.ca.gov/pub/13-14/bill/asm/ab_1801-1850/ab_1826_bill_20140928_chaptered.pdf)

<sup>iii</sup> <https://www.calrecycle.ca.gov/Organics/Food/Commercial/Liquefiers>

<sup>iv</sup> [https://www.epa.gov/sites/production/files/2017-08/documents/ca0107409-point\\_loma\\_301h\\_decision\\_and\\_tdd\\_2017-08-04.pdf](https://www.epa.gov/sites/production/files/2017-08/documents/ca0107409-point_loma_301h_decision_and_tdd_2017-08-04.pdf)

<sup>v</sup> <https://www.epa.gov/sites/production/files/2017-08/documents/federal-water-pollution-control-act-508full.pdf>

<sup>vi</sup> Municipal Code §64.0200(i)

<sup>vii</sup> Municipal Code §64.0500

<sup>viii</sup> Municipal Code §64.0701

<sup>ix</sup> Municipal Code §64.0512(a)