



## Wastewater Hearing Authority Minutes

Meeting: June 22, 2023

**Attendees:** Dr. Edward Thackston (Chairperson) | Dr. Robert Wingfield (WWHA) | Mr. Jay Tant (WWHA) | Mr. David Gilles (WWHA) | Jim Snyder (MWS) | Marty Mast (MWS) | Byron Ross (MWS) | Andy Welch (MWS) | Dr. Manny Ojo (MWS) | Brent Freeman (MWS) | David Tucker (MWS) | Sara Wilson (MWS) | Chase Block (MWS) | Nikki Brahmhatt (MWS) | Will Ellis (MWS) | Susan D. Murillo (Court Reporter) |

**I. Meeting Called to Order at 1:31 pm**

Dr. Edward Thackston, Chairperson, MWS Wastewater Hearing Authority

**II. Review and Approval of MWS WWHA Minutes**

**Presenter: Dr. Edward Thackston**

The meeting minutes were unanimously approved with the request to include the 3-2 vote on the Calypso Café motion. Dr. Thackston urged that all votes be recorded in the minutes.

**III. Review of the Semiannual Pretreatment Report**

**Presenter: Marty Mast, MWS Environmental Compliance**

The only instance of note within the six-month reporting period for the treatment plants was a three-day average limit exceedance for phenols at the Whites Creek Wastewater Treatment Facility. An investigation into potentially responsible industrial users within the vicinity yielded disparate findings.

Six users of the Industrial Compliance sector were considered “significantly non-compliant.” Five of these malfeasances were discharge violations, and the remaining user had failed to submit a self-sampling report within 30 days. Our principal offenders were Welcome to 1979 (a plating company that makes masters for vinyl records) and Onsite Environmental. Welcome to 1979 is scheduled for additional sampling, which is currently being undertaken.

As for Onsite Environmental, the SNC Form shows their continuous permit exceedances for numerous categorical limits. The egregious violations have led to the issuing of the Administrative Order mentioned on the Form 7 summary sheet. A formal meeting was held between MWS Environmental Compliance and representatives from Onsite Environmental resulting from a Show Cause Order. During this meeting, MWS Environmental Compliance aired their concerns and requested actionable means to address them. Terms for an Agreed Order are close to finalized. [We] are cooperatively developing a list of agreements with Onsite’s legal counsel that aims to improve the centralized waste treater’s awareness of their facility’s influent

and update and replace equipment. Mr. Andy Welch presented the list and reviewed which topics have been addressed.

(Please see **Attachment I** to review the Onsite Environmental Action Plan.)

While the continuous violations of numerous parameters are alarming, the most portentous concern is that Onsite Environmental intends to relocate its facility to a location that will discharge to a drastically smaller Publicly Owned Treatment Works. The goal is to remediate the issues and develop best practices before their relocation to prevent significant impacts on the small wastewater treatment plant.

In our previous meeting, Onsite Environmental was discussed as a potentially responsible party for a brightly colored orange influent entering the Central Wastewater Treatment Facility and staining equipment. This topic was addressed in the Show Cause meeting, and Onsite Environmental firmly believes that they are not responsible for the discoloration. An audit of the waste streams entering the Onsite treatment facility proved inconclusive about the source of the brightly colored and iron-rich liquid. Additionally, the orange staining in the sewer line has not been investigated upstream of the MWS Environmental Compliance manhole sampling point. Since the discussion, the orange influent has only appeared once at the Central Wastewater Treatment Facility.

Onsite Environmental has drafted an agreed Administrative Order, including items they have been asked and volunteered to perform. Onsite has incurred large surcharge fees and civil penalties due to the high permit exceedances found during sampling.

#### **IV. Review of the Semiannual Fats, Oils, and Greases (FOG) Report**

Dr. Wingfield thought the FOG Report was well presented with clear and informative graphs that show progress over the years. Mr. Tant was impressed by the small number of overflows due to commercial businesses.

The last presented list of possible problem locations due to FOG has been resolved. The recent focus has been on Onsite. A future goal is for Chase Block to revisit the list of food service establishments that still need to comply to ensure they stay in compliance or resolve the situation if they have not.

Most blockages that create overflows are from grit and debris, a build-up of solid material that is not grease. Most of these are caused by tree roots that penetrate sewer lines—mechanical malfunctions, broken lines, etc., cause the rest of the overflows.

With the large influx of residential communities being built, the focus has been on educating the public with educational materials. These items are distributed to community management/ organizations and are dispersed door-to-door in other areas. The educational literature includes the “do’s and don’ts” of fats, oils, and grease disposal and instructions for sanitary products and flushable wipes. The Strategic Communications Office uses social media to encourage residents of block-long facilities like condos to dispose of grease correctly. The Strategic Communications

Office also does outreach at community events and schools. The management of multi-unit properties is responsible for any issues coming from their properties. If needed, Environmental Compliance has the authority for enforcement actions, which is included in the Enforcement Response Guide, but has not needed to do so with any locations yet.

Calypso Café Follow-Up: The line from Calypso Cafe was cleaned and televised in February. Some debris was found, but none that was a concern of obstruction. The line will continue to be monitored and televised through the end of the year, and an update will be supplied in the March meeting.

**V. Additional Items**

Ethics training was postponed due to the absence of Tara Ladd.

Introduction of Nikki Brahmhatt, the newest addition to the Environmental Compliance team.

**Meeting Adjourned at 2:03 p.m.**

Attachment I: Onsite Environmental Nashville Action Plan

<b>Action Items</b>	<b>Status</b>
1. Terminate the plant manager and supervisor and replace them with a new plant manager and supervisor.	<b>Complete</b>
2. Hire and train a new plant manager and supervisor	<b>Complete</b>
3. Purchase an automatic sampler to replace the rental unit	<b>Work in Progress:</b> Equipment quotes have been reviewed and approved by MWS EC. OE to purchase approved equipment and communicate receipt.
4. Implement hard copy discharge log in addition to automatic sampling	<b>Due 05/01/2023</b>
5. Replace the existing flow meter with the current digital unit.	<b>Work in Progress:</b> Equipment quotes have been reviewed and approved by MWS EC. OE to purchase approved equipment and communicate receipt.
6. Install instrumentation for pH and conductivity.	<b>Work in Progress:</b> Equipment quotes have been reviewed and approved by MWS EC. OE to purchase approved equipment and communicate receipt.
7. Maintain instrumentation calibrated according to the manufacturer's recommendations.	<b>Incomplete:</b> Unable to be completed until items 3 – 6 are completed.
8. Sample as required by Metro permit and any additional requirements	<b>Work in Progress:</b> Sampling frequency is to increase from monthly to weekly. MWS EC has yet to receive weekly samples.
9. Sampling, analysis, and report generation by Phoenix Environmental Engineers	<b>Ongoing</b>
10. Build lockable enclosure of effluent flume	<b>Complete</b>
11. Install video camera of effluent flume area	<b>Complete</b>
12. Implement New Material Approval (NMA) Standard Operating Procedure	<b>Incomplete</b>
13. Hire a lab technician	<b>Work in Progress:</b> Developing a job description and advertising when complete. Will notify when hired.
14. Improve aeration of leachate	<b>Work in Progress</b> Due: 06/01/2023
15. Upgrade hydrocarbon process	<b>Work in Progress</b> Due: 06/01/2023