



Wastewater Hearing Authority Minutes

Meeting: December 14, 2023

Attendees: Dr. Edward Thackston (Chairperson) | Dr. Robert Wingfield (WWHA) | Mr. David Gilles (WWHA) | Ms. Ruthie Cherry (WWHA) | Marty Mast (MWS) | Andy Welch (MWS) | Brent Freeman (MWS) | Sara Wilson (MWS) | Chase Block (MWS) | Nikki Brahmhatt (MWS) | Will Ellis (MWS) | Al Pogue (MWS) | Megan Woodring (MWS) | Tara Ladd (MWS Legal) |

I. Call to Order – Review and Approval of Meeting Minutes

Before the meeting minutes were approved, Dr. Thackston inquired about the serial violator Onsite Environmental's new facility location.

The waste treatment facility will be located on Whites Creek Pike near Briley Parkway, keeping them in the MWS district. The receiving POTW will be the Whites Creek Water Reclamation Facility, a significantly smaller plant than Central. Dr. Thackston stressed the importance of monitoring this organization, as its impact will be much more significant at a smaller water reclamation facility.



1 New facility location: Onsite Environmental

II. Review and Approval of 2024 Meeting Dates

The proposed meeting dates for the year were included in the pre-meeting email attachment and the members' binders. The record keeper will send out Microsoft Outlook calendar reminders for each meeting date, and Authority members will review their schedules and communicate any potential calendar conflicts as they arise.

III. Review of the Onsite Environmental Agreed Order

A few weeks before this meeting, MWS Environmental Compliance (MWS EC) and Onsite Environmental negotiated an Agreed Order, which addressed the operational issues that led to numerous permit limit exceedances by the industrial waste treater. A summary of the Agreed Order was included in the previous meeting minutes and referenced to discuss the organization's improvements. These include hiring a laboratory technician, paying fines on time, and consistent improvements toward compliance with only surcharge exceedances (which are characteristic of treatment facilities of this nature.) It is speculated that the reason behind this facility's newfound permit compliance is their temporary diversion of waste streams to additional facilities. The remaining Agreed Order items are being considered a work in progress. MWS EC is awaiting further Agreed Order updates and intends to continue to provide reports at upcoming WWHA meetings.



Currently, MWS Environmental Compliance is continuously sampling, with and without notice to Onsite Environmental. The volume of treatment from this organization awed the Authority members. When MWS EC was questioned about Onsite Environmental's client list, it was discussed that although a waste stream manifest audit has been conducted, the pre-treater has a branching list of clientele.

Additionally, there had been previous discussions regarding *Orange Incidents*, in which a viscous, greasy influent was discovered in the collection system and the Central Water Reclamation Facility. Since the Agreed Order has been in effect, only one *Orange Incident* has occurred. Onsite representatives admitted to a recent storage tank cleaning when questioned about any possible connection to the incident. However, no substantial evidence exists that the waste treatment facility is responsible. MWS EC has yet to define a source of the orange flows.

IV. Review of the Semi-Annual Report

The Semi-Annual Report focused on five significant industrial users in violation: NWI (aka Textron or Aerostructures), AAA Plating, Onsite Environmental, Tallus, and Welcome to 1979.

Beginning with Welcome to 1979, the vinyl record-making organization is a facility of concern due to the magnitude of its violations. It consistently has a low discharge volume with high metal concentrations. Its permit violations have been calculated up to six digits. Fortunately, Welcome to 1979 hired a new plant manager, which led to improvements, such as maintaining pH limits and utilizing an RO tank system to remove metals. Additionally, he is working with vendors to filter additional metals properly. The improvements are moving slowly, but they are trending upwards. MWS EC intends to continue to provide reports at upcoming WWHA meetings and hopes the positive trend will continue so that the Authority will not have to be involved.

Next, Dr. Thackston commented that the most significant violations were related to metal concentrations. When discussing Nashville Wire, MWS EC reported that although there were previous nickel issues due to a hole in a filter press, they have since come into compliance. While Mid-South Wire was in violation, it was due to a late submittal and not due to metals. Since then, Mid-South Wire has submitted it before its due date.

NWI, formerly APCO and Textron, is a long-standing airplane wing manufacturer near the airport. They self-reported sampling during a system breakdown when the resin-based treatment system chain had exceeded its lifespan. This facility was sampled last week and has shown compliance.

Finally, a new industry associated with powder-coating the shipment conveyors at Amazon warehouses had shuffled their managers between facilities. Since the violation, the previous manager has been returned to the site in question, and things have already improved.



V. FOG Enforcement Update

With the successful training of new MWS Environmental Compliance Officers who are now independently reporting in the field, senior MWS EC employees have had time to focus on additional items such as policy improvements. A summary of policy improvements will be provided in upcoming meetings.

One such improvement is the FOG Enforcement Update template. The original report did not showcase the enforcement response time, and the new version includes color-coded response time keys.

- Red signifies a physical impact on the collection system or POTW.
- Yellow signifies an area of concern with no identifiable impact.

The chart shows that red and yellow items are closer to the present day, which is because MWS EC has had less time to work on these issues.

Although no places currently require an Issued Order, two businesses indicated in red, Subway and Seafood Sensation, have been non-responsive and require additional follow-up.

The Authority members will receive color-coded copies of this report in future meetings.

VI. Annual Ethics Training

Meeting Adjourned