



## **Wastewater Hearing Authority Minutes**

**Meeting: December 04, 2022**

**Attendees:** Dr. Edward Thackston (Chairperson) | Dr. Robert Wingfield (WWHA) |  
| Ruthie Cherry (WWHA) | Mr. David Gilles (WWHA) | Tara Ladd (Metro Legal Attorney) |  
| Jim Snyder (MWS) | Marty Mast (MWS) | Ted Taylor (MWS) | Andy Welch (MWS) | Will Ellis (MWS) |  
Dr. Manny Ojo (MWS) | Brent Freeman (MWS) | Sara Wilson (MWS) | Chase Block (MWS) |  
| Teresa Lyons-Oten (MWS) | Mary Peoples (MWS) | Trey Cavin (MWS) |  
| Susan D. Murillo (Court Reporter) | Allison & Phil Brooks (Calypso Café) |

**I. Meeting Called to Order at 1:30 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 addition of a single phrase.

**III. Introduction of Brent Freeman and Sara Wilson**

**Presenter: Dr. Edward Thackston and Jim Snyder**

Brent and Sara will be replacing Jim Snyder and Teresa Lyons-Oten, respectively.

**IV. Approval of the Proposed Schedule for 2023**

Dr. Thackston requested that all members and attendees tentatively record the proposed meeting dates in their calendars. The next meeting (March 23, 2023) will contain a vote to approve the remaining dates. There were no comments made regarding pre-existing conflicts at this time.

**V. Fats, Oils, and Grease Enforcement Update**

**I. Calypso Café**

**Presenters: Andy Welch and Phil & Allison Brooks of Calypso Café**

The Grease Control Program through MWS Environmental Compliance has reported a moderate accumulation of FOG in the public sewer downstream from Calypso Café (Thompson Lane). This establishment has been in business for twenty-two years. The moderate FOG deposit discovered in 2018 during line television is not likely to cause an overflow, and the sewer line has not required direct maintenance attention. However, Calypso Café has never utilized any grease control devices. Although their food is prepared in a separate kitchen (on Charlotte Pike), the Thompson Lane location has received a

request from Environmental Compliance to connect their triple sink, mop sink, and floor drain to a grease trap or take it out of service. Typically, Environmental Compliance will allow three months to a year for an organization to become compliant. In this case, the time frame requested has been brought to the Authority to determine how long this restaurant may continue to operate without grease control.

The representatives from Calypso Café (Phil and Allison Brooks) explained that the location of the matter (Thompson Lane) produces a little less than five gallons of “grease” daily from rotisserie chickens. The grease is manually collected and recycled as dog food. The Brooks have actively participated in the compliance changes over the years that they have been in business and take measures to be responsible with their sewer discharges. The installation of grease control at their restaurant would involve significant construction, and they are not eager to undergo such changes, especially since there is a chance that the construction may not completely resolve the sewer’s FOG accumulation issue.

The Brooks are requesting up to two years to continue operating at current practices as they recover from financial loss due to the pandemic and assess the market conditions of their restaurant through the potential recession. At that time in the future, they hope for the financial stability to shut down operations long enough to undergo the necessary construction to install the requested plumbing changes and grease interception, which is estimated to be around \$25,000.

Metro Water Services estimates the cost of remediating the current grease buildup in the public sewer line to be up to \$5,000. Once the line is cleaned, it is also televised, creating a record of the condition of the sewer at the date of remediation. The Wastewater Hearing Authority passed the motion for an Agreed Order between Calypso Café and MWS Environmental Compliance by a vote of 3-2, in which MWS will clean the aforementioned sewer segments. At the time of cleaning, a grace period of two years will commence allowing Calypso Café representatives Allison and Phil Brooks to assess the profitability of their establishments and their financial ability to come into permanent compliance. During the two-year grace period, Calypso Café will continue to utilize best management practices to prevent grease from entering the sewer. After the two-year grace period, the sewer line will again be televised, and MWS Environmental Compliance will reassess the FOG accumulation for which the establishment is responsible. Any attentional FOG remediation needed at that time will become the financial responsibility of Calypso Café. Additionally, it is expected that Brooks’ will reappear before the Authority at the end of the grace period.

## **II. Orange Influent – Damages, Expenses, and Future Action**

**Presenters: Ted Taylor, Andy Welch, and Marty Mast**

The following topic is being introduced to the Authority to apprise the members of Environmental Compliance’s ongoing investigation and aggressive enforcement escalation from Notice of Violation (NOV) to Administrative Order before confronting the responsible organization.

A recurrent, unidentified, viscous orange influent enters the Central Water Reclamation Facility (CWRF) and stains new infrastructure. MWS Environmental Compliance's investigation into the source of the flow led to the discovery of numerous sewer lines clogged with a viscous substance comprised of FOGs, petroleum, and calcium. Ace Pipe Cleaning was contracted to clean the clogged lines at a high cost to MWS. There is evidence that the responsible party for the sewer line blockages and the source of the orange influent is the centralized waste treatment facility Onsite Environmental. Onsite discharges to the sewer lines have been sampled and contain high ammonia and heavy metals. Due to their operations, discharges from Onsite vary widely in composition; nonetheless, they have received numerous NOVs for their various discharges on parameters including but not limited to viscosity, BOD, TSS, ammonia, and heavy metal concentration. Environmental Compliance is considering either revoking Onsite Environmental's permit or restricting their discharge volume, which would ultimately be the decision of the Authority.

**VI. Industrial Compliance Semi-Annual Report**  
**Presenter: Marty Mast**

Two organizations fell under significant non-compliance – AAA Plating and Welcome to 1979. AAA Plating had a spike in zinc concentrations which affected their four-day average, and have since corrected their discharges. Welcome to 1979 (W1979) is a new vinyl record pressing organization, and they are in their first six months of the pretreatment program. W1979 has had spikes in nickel concentrations, but there has not been enough sampling to determine their compliance status. They are installing new treatment equipment and communicating regularly with Mr. Pogue of Environmental Compliance. Dr. Thackston has requested a follow-up on the compliance status of Welcome to 1979 in the next meeting.

**VII. TDEC Inspection Results Letter**  
**Presenter: Marty Mast**

The Tennessee Department of Environmental Compliance issued a complimentary letter regarding their Pretreatment Audit Inspection of the Nashville Metro Water Services Industrial Pretreatment Program which stated:

*MWS appears to have an excellent pretreatment program. The files were very well organized, and your staff appears to have an outstanding working relationship with the industries. We [TDEC] appreciate the cooperation and hospitality shown during the inspection.*

The requests outlined in the letter were addressed and returned to TDEC by the Deputy Director.

## **VIII. Other Business**

### **I. Onsite Environmental Question – Mr. Gilles**

Mr. Gilles suggested requesting the presence of Onsite Environmental representatives before the Authority to explain their treatment processes and give insight into their metal concentration violations. The current Order of Assessment presented to Onsite Environmental will inevitably result in their appearance before the Authority if there are any challenges. Onsite's discharges are actively disrupting Publicly Owned Treatment Works (POTW) and are expected to answer for these disruptions.

### **II. Ethics Training Postponed**

Annual Ethics Training has been postponed due to the absence of Mr. Jay Tant. The training is required for all members, so it will be held by Tara Ladd (Metro Legal) at the next meeting.

### **III. Onsite Environmental Orange Inflow (Continued) Presenter: Trey Cavin**

Clean Water Nashville Project Manager of the Central Treatment Plant Optimization is the Orange Influent subject matter expert. Trey presented images of the greasy, brightly colored influent and stated that it had stained numerous portions of new infrastructure such as concrete, stainless steel, and fiberglass with exposure in as little as a week. The influent staining has the potential to diminish the Ultraviolet Transmittance of new disinfection equipment and poses a massive risk to public health and safety. The composition of the influent has yet to be determined; thus, the method for cleaning the staining is unknown. Testing for the new ultraviolet disinfection system is scheduled for early March, and the influent must be controlled before that time.

Unfortunately, there has not been enough evidence to concur the specific source of the discharged orange flow doubtlessly. Environmental Compliance had set up a sampling device within Onsite Environmental's main discharge flume, and the organization members are aware of the sampler. Further investigation, television, and sampling revealed that the tied-in discharge lines surrounding the plant near Page's Branch Creek had manhole overflows, leading to FOG entering the creek. Unbeknownst to Onsite Environmental, a sampler has been deployed at this location to determine if the organization is controlling the discharges sampled by Environmental Compliance.

Trey Cavin has installed a color sensor in a CWRP influent channel and discovered a pattern to the colorful influent. The orange flow typically arrives on either Mondays or Fridays. Additionally, aerial photographs of construction progress have captured the presence of the flow within the plant. Laboratory analysis of the orange influent has revealed high iron concentrations but no signs of volatile organics. From his twenty-five years of experience treating wastewater in the steel industry, Authority member Dave Gilles is confident that

the orange influent is “pickle liquor.” Pickle liquor is an acid solution that descales or cleans steel in various steelmaking processes. Mr. Gilles stated nothing can be added to the wastewater stream to remove the compounds without precipitating the iron. The high calcium discovered in various samples is due to “liquor’s” reaction with high alkalinity. Though discharges are not permissible to contain any coloration, Mr. Gilles suggests amending Onsite’s current permit to include an additional iron limitation.

Dr. Wingfield inquired about the acidic, iron-rich orange influent’s effect on the solids digestion process. Trey Cavin explained that the orange flow causes fluctuations in Dissolved Oxygen Demand (DOD) in primary clarification and aeration and increases biogas production in anaerobic digestion.

**The meeting Adjourned at 3:28 pm.**