



# Wastewater Hearing Authority Minutes

**Meeting Date:** July 25, 2024

**Call to Order:** 1:32 pm

**Adjourn:** 2:57 pm

**Authority Members:** Dr. Thackston, Dr. Wingfield, Mr. Tant, and Ms. Cherry

**In Attendance:** **MWS Representatives:** Chase Block, Brent Freeman, Claude Grant Jr., Tara Ladd, Sara Wilson, Marty Mast, Dr. Manny Ojo, Al Pogue, Ted Taylor, Andy Welch, and Byron Ross.

I. **Meeting minutes:** Approved without any corrections.

II. **Review of the Semi-Annual Report 77**

- The Semi-Annual Report showed no exceedances occurring within any MWS water reclamation facilities or the Central Biosolids facility.
- Metal concentrations within Biosolids were deficient (1-10%). This may show that the long-standing metal industries in Nashville have either remediated their discharge or left the local collection systems. The low concern for heavy metals has shifted the focus of industrial pretreatment compliance to Fats, Oils, and Grease (FOG.)
- On the effluent sampling table—removal percentages are variable and include zeros, which indicate that items are below the detection limit.

i. **Significant Non-Compliance (SNC) Review – Industrial User: *Onsite Environmental***

At the start of 2024, Metro Water Services Environmental Compliance (MWS EC) and Onsite Environmental (OE) entered into an Agreed Order in which OE was required to make significant operational changes and continue to undertake industrial waste pretreatment with a revision to their permit. Early on in the first six months of the annual report, OE committed parameter violations. Since that time, they have made considerable strides towards compliance. The most progressive act from Onsite Environmental has been their decision to refuse waste from outside haulers. Doing so has led to a drop in contaminants –  $\frac{1}{13}$  tin violation, and  $\frac{1}{4}$  P-cresol violation. Dr. Wingfield expressed interest in P-Cresol, leachate, and petroleum. Mr. Welch and Mr. Mast expressed that leachate is received seasonally. As for petroleum, the permitted limit for OE is the same as the set standard for discharging petroleum directly into a receiving stream. Should Onsite Environmental eliminate petroleum from their waste stream, it would change the organization's status with MWS Environmental Compliance – P-Cresol testing would no longer occur. Organics would be tested solely.



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Representatives from Onsite Environmental will present a request for a pH variance to the Wastewater Hearing Authority at the autumn meeting. The industrial pre-treater aims to raise its pH limit from 10 to 11 to improve its treatment of metals. A presentation from the last organization requesting the same variance concluded that the heightened pH would not impact the Publicly Owned Treatment Works (POTW) unless another discharger with a low pH discharge shares the collection system line. For the collection system utilized by OE, MWS EC expects dilution of their discharge.

## ii. **Significant Non-Compliance (SNC) Review – Industrial User: *Welcome to 1979***

The industrial user Welcome to 1979 has been sold and rebranded by its new owner as Vinylab. The vinyl record production company is relocating to South Broadway near The Gulch and replacing all staff. MWS Environmental Compliance officials believe that Vinylab has started well as an industrial user, and their approximate 40 gal/day discharge will be simple to keep in compliance.

## III. **Policy Draft: Fats, Oils and Grease (FOG)**

MWS Environmental Compliance's FOG Policy has not been revised in over a decade. Chase Block has worked to update the document to include changes such as allowing for new technology and Best Management Practices. A draft of this policy (with revisions outlined) will be sent to Authority members next week. MWS EC members are requesting that the WWHA review the policy revision draft and prepare comments for discussion in the autumn meeting. Environmental Compliance revision author Mr. Block hopes to have the policy ratified by the Wastewater Hearing Authority so that a final policy can be presented to the Council.

The summary of revisions presented during the meeting led to a discussion about residential FOG impacts on the collection system. While residential buildings such as apartment complexes have impacts on collection system equipment from flushable wipe usage, FOG has not been a persistent issue across Nashville. When a hot spot of FOG buildup is discovered (such as in southeast Nashville, where 75% of sewer system overflows (SSOs) occur from residential FOG), it is traced to the source on a regularly scheduled regimen. Although there is not a currently implemented limit for FOG discharge for residences, MWS EC has developed and distributed literature to apartments and condominiums to increase education and open discussions about residential responsibility.

No Nashville restaurants have recently violated FOG regulations. However, MWS EC has expressed concern about the complicated and incomplete installation of the grease maintenance system for the new Tanger Outlet Mall.



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## IV. **New Grease Waste Hauler Enforcement Response Guide**

Environmental Compliance officials aim to standardize enforcement for all grease waste-hauling entities. The WWHA members were asked to review the policy and provide comments.

Following multiple audits, unacceptable activities from grease waste haulers were discovered. Examples include fraudulent certification forms, dumping into an interceptor instead of pumping, and only skimming the interceptor and not removing the settled solids.

The development of the Grease Waste Hauler Enforcement Response Guide will allow MWS Environmental Compliance to perform inspections and audits. Haulers will be required to report all pumping events, dates, and volumes monthly. This information is then input into a database, allowing for activity analysis.

Once this policy is implemented, each grease waste hauler will be required to read and sign the agreement to be aware of the penalty rates for specific violations. Although Environmental Compliance sets penalty rates, input from WWHA members would be welcomed in rate setting.

Mr. Tant suggested that the instructions for appeal through the Wastewater Hearing Authority in the FOG Policy should be included in the Grease Waste Hauler Enforcement Response Guide.

FREDDIE O'CONNELL  
MAYOR



**METROPOLITAN GOVERNMENT OF NASHVILLE AND DAVIDSON COUNTY**

DEPARTMENT OF WATER AND SEWERAGE SERVICES

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**V. Update: Calypso Café Agreed Order**

Per the Agreed Order addressed by the Wastewater Hearing Authority in December 2022, Calypso Café's owners, Mr. and Mrs. Brooks, received television of their sewer line after the line was cleared. The television video did not adequately showcase that the recording occurred immediately after the line clearing. Concurring with the Brooks', MWS Environmental Compliance recorded a new television. This new recording has moved the date of the compliance agreement from beginning in February 2023 to beginning on 05/11/2024.