

NUMBER 67

# METRO WATER SERVICES

NASHVILLE, TENNESSEE

## SEMI-ANNUAL STATE REPORT



PRETREATMENT PROGRAM  
ENVIRONMENTAL COMPLIANCE DIVISION

October 1, 2018 – March 31, 2019

DAVID BRILEY  
MAYOR



# METROPOLITAN GOVERNMENT OF NASHVILLE AND DAVIDSON COUNTY

DEPARTMENT OF WATER AND SEWERAGE SERVICES  
Operations Division - Environmental Compliance  
1360 County Hospital Road  
Nashville, TN 37218-3019

April 28, 2019

Ms. Laurel Rognstad  
State Pretreatment Coordinator  
Division of Water Resources  
William R. Snodgrass Tennessee Tower  
312 Rosa L. Parks Avenue, 11<sup>th</sup> Floor  
Nashville, TN 37243

Ms. Rognstad:

**RE: METRO NASHVILLE PRETREATMENT PROGRAM  
67th REPORT October 1, 2018 – March 31, 2019**

The Metro Department of Water and Sewerage Service Pretreatment Program is on schedule with our program, as approved on April 5, 1984.

We have issued three (3) Notices of Violation, zero (0) Administrative Orders, zero (0) Show Cause Hearing, \$15,000.00 penalties collected from an administrative order issued during the previous reporting period, and zero (0) Compliance Schedule to Significant Industrial Users (SIUs) during this reporting period.

We welcome the opportunity to discuss this report in depth with you, after you have had time to review this submittal. If you have any questions and/or comments, please contact Mr. Andy Welch, Environmental Compliance Manager, by calling (615) 862-4590.

Sincerely,

A handwritten signature in blue ink, appearing to read "David M. Tucker".

David M. Tucker  
Water Services Deputy Director



If you need assistance or accommodations, please contact Metro Water Services,  
at 615-862-4862, 1600 Second Avenue North, Nashville, TN 37208.



Department of Environment & Conservation  
 Division of Water Resources  
 William R. Snodgrass Tennessee Tower  
 312 Rosa L. Parks Avenue, 11<sup>th</sup> Floor  
 Nashville, TN 37243  
 (615) 532-0625

**CONTROL AUTHORITY PRETREATMENT SEMI-ANNUAL/ANNUAL REPORT**

<b>Control Authority Identification:</b>				
Control Authority Name :	Metropolitan Government of Nashville and Davidson County Department of Water & Sewerage Services			
Report Date :	April 28, 2019			
Reporting Period Covered by this report	From	October 1, 2018	To	March 31, 2019
Reporting Period Covered by previous report	From	April 1, 2018	To	September 30, 2018

Name of Wastewater Treatment Plant(s)	NPDES Permit No.
Central Wastewater Treatment Plant	TN-0020575
Dry Creek Wastewater Treatment Plant	TN-0020648
Whites Creek Wastewater Treatment Plant	TN-0024970

Person to contact concerning this report: Mr. David M. Tucker	Title or Position: Water Services Deputy Director		
Mailing Address: 1600 2 <sup>nd</sup> Avenue North	City: Nashville	State: TN	Zip: 37208
Phone number(s): (615) 862-4584	E-mail (optional):		
Fax number (optional):	Website (optional):		

<b>Report Certification:</b> (must be signed in accordance with the requirements of Tennessee Rule 1200-4-14-.12(13))	
"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person(s) who manage the system or are directly responsible for gathering the information, the submitted information is to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. A false statement is subject to the penalties of perjury."	
Name: (print or type) David M. Tucker	Title: (print or type) Water Services Deputy Director
Signature: 	Date: 4/30/19

## Pretreatment – Narrative Summary

### SEMI-ANNUAL REPORT

Number 67 (October 1, 2018 to March 31, 2019)

#### Narrative

#### Update of Actions

The Department of Water Services issued three (3) Notices of Violation, zero (0) Administrative Orders, zero (0) Show Cause Hearing, \$15,000.00 penalties collected from an administrative order issued during the previous reporting period, and zero (0) Compliance Schedule to Significant Industrial Users (SIUs) during this reporting period.

#### Enforcement Actions

**1. Industrial Users that were issued a Compliance Order, etc. prior to the time period of this State Report.**

Tradebe -- Issued an Order & Assessment on 7/13/18 for continued violations of permit limits. Civil Penalty of \$21,725 was included. The Order was presented to the Waste Water Hearing Authority on December 6, 2018 for review.

**2. Industrial Users issued an Order, etc. during the time of this State Report.**

none

**3. Industrial Users who have met all conditions of Orders and are now in compliance.**

Tradebe – The WWHA heard the case against Tradebe on December 6, 2018. A ruling was issued that required Tradebe to pay a civil penalty of \$15,000 for violations.

The penalty assessment was paid February 11, 2019.

Sampling conducted in February 2019 showed compliance with permitted limits.

**4. Industrial Users who have not met all conditions of Orders and/or are still not in compliance.**

none

**5. Ongoing cases**

none

**Changes in the Pretreatment Program****1. New Significant Industrial Users during past six (6) months**

none

**2. Industrial Users that have gone out of business or allowed I.U. Permit to expire voluntarily during the past six (6) months**

none

**3. Industries with name changes during past six (6) months**

none

**4. Industries with changes in categorical status during past six (6) Months.**

Ford Motor Company -- an agreement with the State of Tennessee allowed Ford to discharge most of their leachate to the river under their NPDES permit. The current average daily flow during the past 6 months was 7500 gpd and Ford is no longer an SIU.

**5. Industries whose flows changed significantly from the previous 6-month period****❖ Central**

Kennametals -- +117.4% The percentage increase is somewhat misleading. The flow during the previous SAR 67 was 1,330 gallons. The flow average for SAR 68 is 2891 gallons. The reason for the increase is due to increased work load and additional machinery being used.

Metro Nashville Airport Authority -- - 64.2% The MNAA didn't need to discharge to the WWTP. The reason being, analytical results for the water in the MNAA basin met the NPDES permit limits so discharge was made to the receiving stream.

Metal Stripping Systems -- +37.5% -- increase in customer orders.

Mid-So. Wire Co (Galv Div.) -- +28.5 -- Increase in customer orders.

Palm Int'l -- -34.4% -- Increase in customer orders.

Quality Industries -- +44.8% -- Increase in customer orders.

**❖ Dry Creek**

S & H Chrome Plating -- +50.0 I.U. installed a larger holding tank ( 500 gallons to 1,000 gallons)

**❖ Whites Creek**

Nashville Wire Products (Material Handling Div.) -- -48.3% NWP installed a new washer line. The newer washer uses less water than the old one.

Servitech – no discharge from the metal finishing operation during this reporting period

**6. Industries relocated during past six (6) months**

none

**7. New Industrial Category**

none

**8. Additional Items of Note**

The flow data for Metropolitan Nashville Airport Authority in Form 3, Central Wastewater Treatment Plant (green pages) is for a single, multi-day discharge event. The flow for this event was measured to be 1,591,000 gallons total and is not intended to be an average daily flow.

**Industrial Waste Survey**

Metro Water Services, Industrial Compliance Section, performs Industrial Waste Surveys on a continuous basis. During daily sampling runs, windshield surveys are performed. A review of the business section of the Tennessean is done daily. Review of the Yellow Pages and TN Manufacturers Index are done periodically. Requests for building permits for industrial or food service establishments are flagged and are reviewed by the Pretreatment Section. Permitting, sampling and inspections of non-significant industrial users are performed throughout the year. In addition we continue to receive updates of all commercial accounts from our billing department and a review for any major changes or additions is on-going,

During this past six months, Metro Water Services has fifty-two (52) non-SIUs permitted with zero (0) new non-SIU permit issued during the past six months. Last reporting period, there were fifty-two (52) non-SIU's. Metro Water Services sampled an additional thirty (30) non permitted facilities of interest during the past six month period that may or may not be permitted in the future.

**Evaluation for the need to recalculate Local Limits**

Metro Water Services is currently in compliance with all pass through limits for all three wastewater treatment plants. No change of a significant nature has occurred with the quality or quantity of Industrial wastewater discharge or in the treatment quality or capacity of the treatment plants. The Department has completed the process of calculating new Local Limits as part of the changes to the pretreatment program that correspond with the new Streamlining requirements and have begun implementation of these limits in new industrial users' permits. In addition, a notice of change in the pretreatment program was published in the newspaper in March 2013, as requested by the State of Tennessee. There were some typographical errors in the previous submittal to the State and public review, so corrections were made and a notice was published March 29, 2013. An updated review of the local limits was completed as part of the waste water permit renewal process and was submitted to TDEC in March, 2016 and again in September and October 2017.

**Miscellaneous**

This report has been color-coded, instead of tabbed. Common items are white (including Form 7), Central Wastewater Treatment Plant documents are green, Dry Creek documents are blue, Whites Creek documents are yellow and Satellite Communities are in gray.

## Satellite Dischargers

"Satellite Dischargers" shall be defined as those cities, towns, or other self-governing municipal incorporations that discharge wastewater to the P.O.T.W.'s controlled by the Metropolitan Government of Nashville and Davidson County.

Pursuant to the 1987 decision by the State of Tennessee, the responsibility of enforcement of the pretreatment program ultimately falls upon the holder of the NPDES Permit.

The Metropolitan Government of Nashville and Davidson County has granted Satellite Dischargers the responsibility for establishment and enforcement of a pretreatment program in their own communities. If such a program is not instituted or enforced by the Satellite Discharger, the Department of Water Services, acting as an agent for the Metropolitan Government of Nashville and Davidson County, shall exercise its jurisdictional authority, as granted by the State of Tennessee, and institute the pretreatment program for the Satellite Discharger. In the event that the Department of Water Services must operate a pretreatment program on behalf of a Satellite Discharger, penalties will be levied against the Satellite Discharger to recover any costs of instituting, operating, or enforcing such a program.

The Department of Water Services has sampled all of the Satellite Dischargers which discharge to the Department's Publicly Owned Treatment Works along with reviewing sampling results and pretreatment reports. The Sewer Use Ordinance requires Satellite Districts to comply with the Municipal Users permits which have been issued.

The following Satellite Pretreatment Programs have been assimilated by Metro Water Services Pretreatment Program:

- 1.) Cumberland Utility District (Metro's System) MP-0001
- 2.) Millersville Utility District MP-0004
- 3.) Old Hickory Utility District MP-0009
- 4.) City of LaVergne MP-0007
- 5.) White House Utility District DC-0257
- 6.) City of Ridgetop CP-0287
- 7.) City of Nolensville (Metro's System) (No Permit)

Additionally, the following satellite systems have no ***Significant Industrial Users***:

- 1.) Hendersonville Utility District MP-0002
- 2.) City of Belle Meade MP-0005
- 3.) City of Brentwood MP-0008
- 4.) City of Mount Juliet MP-0010

The City of Goodlettsville (MP-0003) is the only satellite community discharging to Metro Water Services with ***significant industrial users***. The City of Mount Juliet has five (5) non-significant non-categorical users, Pace Analytical, Universal Rack, Inc., John Deal Coatings, DeStaCo and Teknia Automotive. The City of Goodlettsville has one significant non-categorical user, Tyson Fresh Meats. Both Mount Juliet's and Goodlettsville's reports are included at the back of Metro's report, but their numbers, where applicable, are included in Form #7 of Metro's report.

## Form 7 Pretreatment Performance Summary

<b>I. General Information</b>		
Control Authority Name: Dept. of Water & Sewerage Services Metropolitan Government of Nashville and Davidson County		
Address: 1600 2 <sup>nd</sup> Avenue North		City: Nashville
Contact Person: David M. Tucker		Contact Phone Number: (615)862-4584
Reporting Period: October 1, 2018 to March 31, 2019		NPDES Number: TN-0020575, TN-0020648, TN-0024970
Number of Categorical SIUs:	Number of Non-Categorical SIUs:	Total Number of SIUs:
28	23	51

II. Significant Industrial Compliance	SIUs	
	Categorical	Non- Categorical
1) No. of SIUs in Significant Non-compliance (SNC)	2	1
2) Reasons for Significant Non-compliance (SNC)		
a) In SNC for Violations of pretreatment standards	2	0
b) In SNC for Reporting Violations	0	1
c) In SNC for Compliance Schedule Violations	0	0
d) In SNC for Other (explain in Narrative Summary)	0	0

III. Monitoring	SIUs	
	Categorical	Non- Categorical
1) Facilities Monitored by CA (samples analyzed for all SIU permit parameters):		
a) No. of SIUs Sampled by the Control Authority (CA)	25	23
b) No. of SIUs Inspected by the CA	15	4
2) Total Monitoring Events:		
a) No. of Samples by the CA	45	101
b) No. of Inspections by the CA	15	4
3) How many SIUs do not have a current control mechanism (permit)	0	0

IV. Enforcement	SIUs	
	Categorical	Non- Categorical
1) SIUs Subject to Any Enforcement Actions (include verbal warnings)	1	3
2) SIUs Listed in the Newspaper for SNC in this period	0	0
3) Notices of Violations Issued *	1	2
4) Administrative Orders Issued *	0	0
5) No. of SIUs on Compliance Schedules (anytime in period)	0	0
6) Suits Filed:		
a) Civil Suits *	0	0
b) Criminal Suits *	0	0
7) Other Actions Taken (sewer bans, etc. but not verbals) *	0	0
8) Penalties Collected: (not surcharges)		
a) No. of SIUs from whom penalties were collected	1	0
b) Total Dollars (\$) collected in the period	\$15,000	0

\* Enter the number of ACTIONS, not the number of SIUs

**FINAL**



IN THE MATTER OF:

TRADEBE TREATMENT & RECYCLING OF NASHVILLE, LLC  
450 Edenwold Road  
Madison, TN 37072

DEPARTMENT OF WATER  
AND SEWERAGE SERVICES

**AGREED ORDER AND ASSESSMENT 2018-01**

**I. PARTIES**

The Metropolitan Government of Nashville and Davidson County (hereinafter, "Metro") is a Governmental, Municipal and Public Corporation created and existing under and by virtue of the Constitution and laws of the State of Tennessee. Metro is empowered to create, maintain, build, purchase and operate sewers and a sewerage disposal system pursuant to *Section 2.01* of the Charter of Metropolitan Government. The Department of Water and Sewerage Services (hereinafter, "Department") is a department of Metropolitan Government created and existing under and by virtue of *Section 8.501 et. seq* of the Charter of the Metropolitan Government. The Department is empowered by *Section 8.502* of the Charter of the Metropolitan Government to construct, operate and maintain all water and sewerage facilities of the Metropolitan Government.

Scott A. Potter is the duly appointed Director of the Department of Water Sewerage Services.

**II. JURIDICTION**

Pursuant to *Section 309 (a) (3) and (a) (4)*, of the *Federal Water Pollution Control Act*, *Section 403.8 (f) (1)* of the *Code of Federal Regulations*, *Section 69-3-101 et. seq.* of the *Tennessee Water Quality Control Act* and *Title 15.60* of the *Metropolitan Code of Laws*; the Department has legal authority to develop, implement and enforce the Federally mandate Pretreatment Program. The Department monitors industrial wastes released by municipal and industrial users to assure compliance with the pretreatment standards found in the aforementioned statues. Tenn. Code Ann §69-3-123 (a) (1) provides;

**Pretreatment Enforcement – Procedure – Compliance – Orders**

When the local administrative officer of any pretreatment agency has reason to believe that a violation of any provision of the pretreatment program of the pretreatment agency or orders of the local hearing authority issue pursuant thereto has occurred, is occurring, or is about to occur, the local administrative officer may cause a written complaint to be served upon the alleged violator or violators.

**III. FACTS**

- 1) Tradebe Treatment and Recycling of Nashville, LLC is an "Industrial User" as that term is defined in the *Ordinance Number BL-2010-678*.

- 2) Tradebe Treatment and Recycling of Nashville, LLC discharges wastewater into the sanitary sewer system of the Metropolitan Government of Nashville and Davidson County.
- 3) The discharge of Tradebe Treatment and Recycling of Nashville, LLC is received at the Dry Creek Wastewater Treatment Plant, Nashville, TN, *National Pollutant Discharge Elimination System (NPDES) Permit Number TN0020648*.
- 4) Tradebe Treatment and Recycling of Nashville, LLC was issued *Industrial User Permit (hereinafter, I.U. Permit) Number DC-0368* on December 6, 2017, which contains prohibitions, restrictions and other limitations on the quality of the wastewater discharged to the sanitary sewer system.
- 5) Tradebe Treatment and Recycling of Nashville, LLC is regulated by the United States Environmental Protection Agency (hereinafter, US EPA) under *Section 307 (b)* of the *Clean Water Act*. *Section 307 (b)* requires the US EPA to promulgate pretreatment standards to prevent the introduction of pollutants into the Publicly Owned Treatment Works (hereinafter, POTW) which would interfere with the operation of such POTWs, or would limit opportunities to recycle and reclaim municipal sludge. The US EPA established pretreatment standards for twenty-six (26) specific industrial categories determined to be the most significant sources of toxic pollutants. These "Categorical Standards" contain numerical limits for pollutants commonly introduced into POTWs by the covered industries. Tradebe Treatment and Recycling of Nashville, LLC is as *Centralized Waste Treatment Facility under the US EPA category, 40 CFR 437, Subpart D -Combined waste receipts from subparts A and B (new source standards)*, and must meet the specific guidelines contained therein, relative to its wastewater discharge to the POTW.
- 6) On January 22, 2018 an automatic sampler was set up at the point of connection for Tradebe Treatment and Recycling of Nashville, LLC. The sampler was programmed to collect one hundred (100) milliliters of sampler every ten (10) minutes. Upon analysis, the composite samples revealed exceedances of the permit limits set forth in the Tradebe Treatment and Recycling of Nashville, LLC *I.U. Permit DC-0368*. *Attachment A*.
- 7) A Notice of Violation (NOV) was issued by certified mail to Tradebe on February 15, 2018. In the NOV, the following permit exceedances were reported to Tradebe. *Attachment B*.

#### Maximum Daily Concentration

<u>Date</u>	<u>Parameter</u>	<u>Permit Limit</u>	<u>Monitoring Results</u>
1/22-23/18	Copper	0.500	0.892
1/22-23/18	Zinc	2.87	5.01
1/24/2018	Bis (2-ethylhexyl) phthalate	0.215	0.74

**Maximum Monthly Concentration**

<u>Date</u>	<u>Parameter</u>	<u>Permit Limit</u>	<u>Monitoring Results</u>
Jan. 2018	Copper	0.242	*0.332
Jan. 2018	Lead	0.160	*0.175
Jan. 2018	Zinc	0.641	*1.928
Jan. 2018	Bis (2-ethylhexyl) Phthalate	0.101	*0.380

All results are in mg/L. \*Maximum Monthly Concentration results are derived from averaging Metro Water & Tradebe sample data collected in January 2018.

- 8) Based on the results listed in the Notices of Violations dated February 15 and March 12, 2018, the Department issued a cease discharge order, by email, on February 15, 2018. Attachment C.
- 9) In a letter dated February 16, 2018, Tradebe submitted a report to the Department containing a plan to deal with the exceedances listed in the February 15, 2018 NOV and to comply with the cease discharge order, February 15, 2018. Attachment D.
- 10) In a letter dated February 21, 2018, the Department received written notification outlining the completed steps taken by Tradebe to remediate and clean the treatment system. The cleaning operations were completed on February 25, 2018. Attachment E.
- 11) On February 22, 2018, an inspection was conducted by James Pogue of Metro Water Services to review the condition of the treatment system at Tradebe. Based on the results of the inspection, the Department issued Tradebe a two (2) day discharge period (2/28 through 3/1/18). The Department sampler was restarted to collect samples to determine compliance.
- 12) The Department received a letter from Tradebe dated March 6, 2018, outlining additional operational and quality control changes to the treatment process. Attachment F.
- 13) A Notice of Violation (NOV) was issued by certified mail to Tradebe on March 12, 2018. In the NOV, the following permit exceedances were reported to Tradebe. Attachment G.

**Maximum Daily Concentration**

<u>Date</u>	<u>Parameter</u>	<u>Permit Limit</u>	<u>Monitoring Results</u>
2/14-15/18	Copper	0.500	0.745

**Maximum Monthly Concentration**

<u>Date</u>	<u>Parameter</u>	<u>Permit Limit</u>	<u>Monitoring Results</u>
Feb. 2018	Zinc	0.641	*1.007

All results are in mg/L. \*Maximum Monthly Concentration results are derived from averaging Metro Water & Tradebe sample data collected in February 2018

- 14) On March 13, 2018, Al Pogue of Metro Water Services and Ron Waterbury of Tradebe conducted a phone conversation relating to the discharge from the Tradebe facility. Points addressed were; 1) Ammonia; 2) Foaming at the Dry Creek WWTP; 3) Excess Oil & Grease discharged from the Tradebe facility and 4) Zinc levels. Attachment H.
- 15) On July 10, 2018, Metro Water Services issued *Order and Assessment 2018-01* to Tradebe for violations documented during the period of January through February 2018. The Order was sent via Certified Mail and was signed for by Ms. Brenda Cain of Tradebe on July 13, 2018.
- 16) On August 13, 2018, Metro Water Services received a letter from Mr. Eric Condon of Tradebe in regards to *Order and Assessment 2018-01*. The letter stated that Tradebe discharged 15 days in January and 13 in February 2018. The letter requested that the Monthly Average violations be adjusted to reflect the actual number of days Tradebe discharged. The adjustment would reduce the civil penalties to \$14,675.00. While Tradebe did respond to the Order and Assessment, Tradebe did not appeal the Order and Assessment to the Wastewater Hearing Authority pursuant to Metropolitan Code of Law Section 15.60.350(12)(b). Because the Order and Assessment was not appealed, Tradebe waived their right to appeal and consented to the assessment.
- 17) On November 5, 2018, Metro Water Services notified Tradebe that the Metropolitan Wastewater Hearing Authority would review the Order and Assessment on December 6, 2018. The notification was made via Certified Mail and was signed for on November 9, 2018.
- 18) On December 6, 2018, the Wastewater Hearing Authority heard the Tradebe matter at their regularly scheduled meeting pursuant to M.C.L . 15.60.350(12)(e). Upon a vote, the Wastewater Hearing Authority decided to hear from Tradebe concerning its exceedances. Upon hearing from Tradebe, the Wastewater Hearing Authority voted to reduce the civil penalty previously imposed to reflect the actual number of days Tradebe discharged, for a total of \$15,000.00, which Tradebe has agreed to pay as a result of its violations of the act.

#### **IV. VIOLATIONS**

By exceeding the effluent limitations established in *ORDINANCE NUMBER BL-2010-678* and US EPA CATEGORY *Centralized Waste Treatment Facility, 40 CFR 437, Subpart D – Combined waste receipts from subparts A and B (new source standards)*, Tradebe Treatment and Recycling of Nashville, LLC has violated *Tenn. Code Ann. Section 69-3-125*, which provides:

##### **Pretreatment Enforcement – Violations – Civil Penalty**

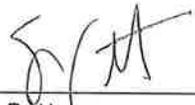
Any person including, but not limited to industrial users, who does any of the following acts or omissions shall be subject to a civil penalty of up to ten thousand (\$10,000.00) dollars per day for each day during which the act or omission continues or occurs:

- a) Violates an effluent standard or limitation imposed by a pretreatment program;
- b) Violates the terms or conditions of a permit issued pursuant to a pretreatment program;
- c) Fails to complete a filing requirement of a pretreatment program;
- d) Fails to allow or perform an entry inspection, monitoring or reporting requirements of a pretreatment program;
- e) Fails to pay user or cost recover charges imposed by a pretreatment program; or,

- f) Violates a final determination or order of the local hearing authority or the local administrative order.

**V. AGREED ORDER**

Tradebe Treatment and Recycling of Nashville, LLC shall pay a civil penalty of \$15,000.00 (fifteen thousand dollars) for its violations of the Act. Payment is to be made by certified check made payable to the Metro Water Services. Payment must be received in this office within thirty (30) days of service of this Order. The penalties cited above were issued by the ruling of the Metropolitan Wastewater Hearing Authority on December 6, 2018.



\_\_\_\_\_  
Scott A. Potter  
Director, Department of Water and Sewerage Services



\_\_\_\_\_  
BY: General Counsel and VP of Risk Management  
Title: Sarah P. Kowalczyk  
Tradebe Treatment and Recycling of Nashville, LLC

**RECEIVED**  
 FEB 11 2019  
 BY: 19-042-12

THIS DOCUMENT IS PROTECTED BY INVISIBLE FIBERS AND CHEMICALLY REACTIVE PAPER. HOLD TO LIGHT TO VERIFY A TRUE WATERMARK.

Tradebe Treatment and Recycling, LLC  
 4343 Kennedy Avenue  
 East Chicago, IN 46312  
 USA

BBVA COMPASS BANK  
 BIRMINGHAM, 35296-0000  
 No. 4110203892

ADDITIONAL SECURITY FEATURES:  DETAILS ON BACK

**PAY** Fifteen thousand and zero / 100 USD

**TO THE ORDER OF** Metro Water Services  
 P.O. Box 305225  
 Nashville, TN 37230-5225  
 USA

**DATE** 01/31/2019

**AMOUNT** \$\*\*\*\*\*15,000.00

  
 AUTHORIZED SIGNATURE



VENDOR: 2100019478  
 REMIT TO: Metro Water Services  
 CHECK: 4110203892  
 DATE: 01/31/2019  
 COMMENT:

INVOICE	DATE	Account N°	COMMENT	AMOUNT	DISCOUNT	NET AMOUNT
2018_PENALTY	12/31/2018			15,000.00	0.00	15,000.00



Department of Environment & Conservation  
 Division of Water Resources  
 William R. Snodgrass Tennessee Tower  
 312 Rosa L. Parks Avenue, 11<sup>th</sup> Floor  
 Nashville, TN 37243  
 (615) 532-0625

**CONTROL AUTHORITY PRETREATMENT SEMI-ANNUAL/ANNUAL REPORT**

<b>Control Authority Identification:</b>				
Control Authority Name :	Metropolitan Government of Nashville and Davidson County Department of Water & Sewerage Services			
Report Date :	April 28, 2019			
Reporting Period Covered by this report	From	October 1, 2018	To	March 31, 2019
Reporting Period Covered by previous report	From	April 1, 2018	To	September 30, 2018

Name of Wastewater Treatment Plant(s)	NPDES Permit No.
Central Wastewater Treatment Plant	TN-0020575

**Form 1a****Results of Sampling at Control Authority**Sample Date(s): **Oct. 7 - 10, 2018 & Jan. 5 - 9, 2019**

Column 1	Column 2	Column 3	Column 4	Column 5	Column 6
Parameter	Influent (mg/l)	Protection criteria (mg/l)	Effluent (mg/l)	Pass Through Limit (mg/l)	Removal Rate (%)
Copper (Cu)	0.021	0.32	0.004	0.08	78.8
	0.026		0.005		
	0.017		0.004		
	0.019		0.006		
	0.020		0.005		
	0.029		0.004		
Chromium III	<0.01	*	<0.01	Report Only	0.0
Chromium VI	<0.01	*	<0.01	0.04168	0.0
Chromium Total	0.002	1.0	<0.001	0.06	31.3
	0.003		<0.001		
	0.001		<0.001		
	0.002		<0.001		
	0.002		<0.001		
	0.006		0.006		
Nickel (Ni)	0.006	0.35	0.004	0.18	59.1
	0.004		0.003		
	0.003		0.003		
	0.007		0.005		
	0.093		0.005		
	0.239		0.123		
Cadmium (Cd)	<0.001		<0.001	0.00388	0.0
	<0.001		<0.001		
	<0.001		<0.001		
	<0.001		<0.001		
	<0.001		<0.001		
	<0.001		<0.001		
Lead (Pb)	0.001	0.153	<0.001	0.045	25.0
	0.001		<0.001		
	<0.001		<0.001		
	0.002		<0.001		
	0.002		<0.001		
	0.001		<0.001		
Mercury (Hg)	<0.0001	0.001	<0.0001	0.0004	0.0
	<0.0001		<0.0001		
	<0.0001		<0.0001		
	<0.0001		<0.0001		
	<0.0001		<0.0001		
	<0.0001		<0.0001		

Silver (Ag)	<0.001 <0.001 <0.001 <0.001 <0.001 <0.001	0.015	<0.001 <0.001 <0.001 <0.001 <0.001 <0.001	0.005	0.0
Zinc (Zn)	0.069 0.062 0.042 0.040 0.045 0.053	0.5	0.027 0.023 0.022 0.016 0.018 0.022	0.2	58.8
Cyanide (CN)	<0.005 <0.005 <0.005 0.0092 0.0069 0.0076	0.084	<0.005 <0.005 <0.005 0.0075 0.0072 0.0091	0.0197	-0.3
Phenols, Total	<0.01 <0.01 <0.01 0.0104 0.0233 0.0171	0.25	<0.01 <0.01 <0.01 <0.01 <0.01 <0.01	0.05	60.6
Toluene	<0.0015 <0.0015	0.036	<0.0015 <0.0015	0.015	0.0
Benzene	<0.0004 <0.0004	0.015	<0.0004 <0.0004	0.003	0.0
1,1,1-Trichloroethane	<0.0004 <0.0004	0.2	<0.0004 <0.0004	0.03	0.0
Ethylbenzene	<0.0009 <0.0009	0.029	<0.0009 <0.0009	0.004	0.0
Carbon Tetrachloride	<0.0004 <0.0004	0.021	<0.0004 <0.0004	0.015	0.0
Chloroform	0.0013 <0.0008	0.258	0.0021 0.0044	0.085	-91.2
Tetrachloroethylene	<0.0004 <0.0004	0.125	<0.0004 <0.0004	0.025	0.0
Trichloroethylene	<0.0004 <0.0004	0.091	<0.0004 <0.0004	0.01	0.0
1,2 trans Dichloroethylene	<0.0003 <0.0003	0.005	<0.0003 <0.0003	0.0015	0.0
Methylene chloride	<0.0033 <0.0033	0.132	<0.0033 <0.0033	0.05	0.0
Naphthalene	<0.0005 <0.0005	0.005	<0.0005 <0.0005	0.001	0.0
Total phthalates	0.011	0.155	<0.0005	0.0645	91.3

	<0.0005		<0.0005		
Xylene	<0.0007 <0.0007	0.015	<0.0007 <0.0007	---	0.0

Include any parameters sampled in the reporting period including the routine semiannual sampling as well as the effluent sampling specified in Section III of the National Pollution Discharge Elimination System (NPDES) permit, including applicable toxic organics (i.e., toluene, benzene, 1,1,1 – Trichloroethane and chloroform).

**You must sample for all parameters in your NPDES Permit at the required frequency (See Part 3 of your NPDES permit for required pretreatment monitoring).**

### Form 1b Bio-solids

What does the Control Authority do with the sludge/bio-solids? *Sold for beneficial reuse or landfilled.*

If biosolids are land-applied, please fill out the following Table.

Parameter	Biosolids Concentration (mg/kg)	503 Table 1 limits Ceiling Concentration (mg/kg)	503 Table 3 limits Monthly Ave. (mg/kg)
Arsenic	5.4 5.6 4.9 5.27 5.61 6.61	75	41
Cadmium	<0.1 <1.1 <1.1 <1.1 <1.1 <1.1	85	39
Copper	176.0 174.5 190.0 163.0 159.0 151.0	4300	1500
Lead	19.0 19.0 16.6 18.3 21.3 28.3	840	300

Mercury	0.29	57	17
	0.26		
	0.23		
	0.376		
	0.386		
	0.405		
Molybdenum	9.4	75	N/A
	10.3		
	8.6		
	6.6		
	6.37		
	6.07		
Nickel	37.0	420	420
	35.0		
	28.1		
	36.7		
	53.9		
	35.4		
Selenium	4.3	100	100
	5.3		
	4.5		
	4.1		
	3.78		
	4.70		
Zinc	384.1	7500	2800
	409.5		
	451.5		
	381.5		
	350.0		
	327.0		

Were there any samples of bio-solids that exceeded the ceiling concentrations from 40 CFR Part 503 (Table 1)? No

What date(s)?

## Form 2

### Report of Upsets, Protection Criteria Violations, Biosolids Violations and Pass-Through Limit Violations

Type of Incident	Date / Limit / Result	Explanation of Incidents	Corrective Action Taken
none			

\* Give a detailed explanation of the causes of the incident and the corrective action taken to date. The corrective action should also include any plans the Control Authority has to identify or correct the problem. If there is not enough room on this form, include the information in the Narrative Summary.

### Form 3 Industrial User Summary

Industrial User Name and Mailing Address	Contact (Indicate Mr. /Ms.) Phone #/Fax# and email address (optional)	Type of Industry **	Actual Flow (GPD)
AAA Plating 3141 Ambrose Avenue Nashville, TN 37207	Mr. Alan Galloway (615) 262-3084	40CFR413 Electroplating >10,000 GPD	11,833
ALSCO 3101 Charlotte Avenue Nashville, TN 37209	Mr. Verland Stout (615) 320-5575	SN Industrial Laundry	59,900
Bridgestone Americas Tire Operations, LLC 1201 Bridgestone Parkway Lavergne, TN 37086	Mr. Sean Fisher (615) 287-7316	SN Tire Manufacturer	143,500
Cargill 2621 Eugenia Avenue Nashville, TN 37211	Mr. Donnie Perry (615) 256-4996	SN Meat Processing	150,400
Chromalox 1382 Heil Quaker Blvd. Lavergne, TN 37086	Mr. Mark Copeland (615) 213-8102	40CFR433 Metal Finishing New Source	1,100
Coca-Cola Bottling Co. 407 Craighead Street Nashville, TN 37204	Mr. Marlon Henderson (615) 383-6230	SN Soft Drink Bottling	84,100
Combs Industrial Services 1501 Baptist World Ctr Dr. Nashville, TN 37207	Mr. Ron Pearson (615) 228-3901	40CFR437 Centralized Waste Treatment Subcategory D	86,000
Country Delite Farms, Inc. 1401 Church Street Nashville, TN 37203	Mr. Aubrey Leake (616) 308-1011	SN Dairy Processing	148,400
CSX Transportation, Inc. 3661 Seaboard Drive Nashville, TN 37211	Mr. Rick Haggard (615) 664-2724	SN Rail Freight Yard	110,800
Feintool 2930 Old Franklin Road Antioch, TN 37013	Ms. Brooke Kearney (615) 471-9749	SN Transmission Components Manufacturing	12,660
Greer Stop Nut, Inc. 481 McNalley Drive Nashville, TN 37211	Mr. John Huber (615) 832-8375	40CFR433 Metal Finishing New Source	0
Harry's Fresh Foods 2960 Armory Drive Nashville, TN 37204	Mr. Paul Jefferies (615) 375-4122	SN Refrigerated & Frozen Food Processing	50,700

Hennessy Industries, Inc. 1601 J.P. Hennessey Blvd. Lavergne, TN 37086	Mr. Rick Kyle (615) 641-7533	40CFR433 Metal Finishing Existing Source	6,000
Kennametal, Inc. 1 Teledyne Place Lavergne, TN 37086	Mr. Matt Kasey (615) 641 4265	40CFR471; 2 Non-Ferrous Metals Refractory Metals New Source	1,330
Leonard Plating Co., Inc. 1403 4 <sup>th</sup> Avenue South Nashville, TN 37210	Mr. Keith Leonard (615) 254-8308	40CFR433 Metal Finishing New Source	700
Metal Stripping Systems 3335 Ambrose Avenue Nashville, TN 37207	Mr. Jeff Winkler (615) 262-3232	40CFR433 Metal Finishing New Source	400
Metro. Nash. Airport Auth. 1 Terminal Drive Suite 501 Nashville, TN 37214	Mr. Kenneth Whatley (615) 275-4052	SN Airplane Deicing	1,591,000 (see narrative)
Mid-South Wire Co. Drawing Division 1040 Visco Drive Nashville, TN 37210	Mr. Mark Moorhouse (615) 743-2886	40CFR420 Iron & Steel Sulfuric Acid Existing Source	24,880
Mid-South Wire Co. Galvanizing Division 1070 Visco Drive Nashville, TN 37210	Mr. Mark Moorhouse (615) 743-2886	40CFR420 Iron & Steel Hot Coating New Source	11,225
Music City Processing 1629 Elm Hill Pike Nashville, TN 37210	Mr. DC Curry (214) 587-7757	SN Grease Trap Waste Processing	94,600
Nashville Wire Products Plating Division 295 Driftwood Avenue Nashville, TN 37210	Mr. Byron Brown (615) 743-2471	40CFR433 Metal Finishing Existing Source	14,022
Palm International, Inc. 1289 Bridgestone Parkway Lavergne, TN 37086	Mr. Daryl Spindler (615) 793-1990	40CFR415 Inorganic Chemicals Existing Source	4,333
Pepsi Beverages Co. 715 Thompson Lane Nashville, TN 37204	Mr. Bryan Stidham (615) 460-1540	SN Soft Drink Bottling	51,800
Purity Dairies, Inc. 360 Murfreesboro Road Nashville, TN 37210	Mr. Jason Thompson (615) 244-1900	SN Dairy Processing	190,800
Quality Industries, Inc. 130 Jones Drive Lavergne, TN 37086	Mr. Randall Jones (615) 781-3000	40CFR433 Metal Finishing New Source	16,426
Quality Plating 705 Fort Negley Court Nashville, TN 37203	Mr. Buddy Sanford (615) 251-3515	40CFR433 Metal Finishing New Source	2,000

Shared Hospital Services 641 Mainstream Drive Nashville, TN 37228	Mr. Tony Whittemore (615) 242-5951	SN Industrial Laundry	36,600
Southern Aluminum Finishing 1417 Poplar Lane Nashville, TN 37210	Mr. David Reedy (615) 259-2800	40CFR413 Electroplating >10,000 GPD	62,500
Stratas Foods 189 Spence Lane Nashville TN 37210	Mr. Matt Driscoll (615) 231-5935	SN Restaurant Food Processing	48,300
Triumph Aerostructures 1431 Vultee Blvd. Nashville, TN 37217	Mr. Derrell Bowden (615) 361-2977	40CFR433 Metal Finishing Existing Source	150,427
Unifirst Corporation 813 Massman Drive Nashville, TN 37210	Mr. Pete Hernandez (615) 255-0535	SN Industrial Laundry	60,900
United Record Pressing 453 Chestnut Street Nashville, TN 37210	Mr. Gary Street (615) 259-3149	40CFR413 Electroplating <10,000 GPD	940
U.S. Smokeless Tobacco 800 Harrison Street Nashville, TN 37203	Mr. Danny Brown (615) 227-2200	SN Smokeless Tobacco Production	40,500
Vietti Acquisition LLC 636 Southgate Avenue Nashville, TN 37204	Mr. Kurt Weifel (615) 244-7864	SN Chili Processing & Canning	37,900
Wolfe Industries, Inc. 1512 J.P. Hennessey Drive Lavergne, TN 37086	Mr. Don Wolfe (615)6 41-6964	40CFR433 Metal Finishing New Source	200

**\*\*If a Significant Industrial User (SIU) is Categorical, list the applicable category (i.e., metal finisher, electroplater, leather tanner, etc.). Non-categorical SIUs should be listed as SN (Significant Non-Categorical), with a description of the process (i.e., SN-landfill or SN-hospital). All Non-significant Categorical Industrial Users (NSCIU) should be listed on the form and identified as an NSCIU. Information on NSCIUs is required on Form 3, but not required on any other form in this report. Industries that are not significant and not categorical are not required to be listed in this report. However, if you wish to list them on this form, please identify them as "Other."**

## Form 4 Industrial User Monitoring Report

Column 1	Column 2	Column 3	Column 4	Column 5
Industrial User Name and Mailing Address	Control Authority Inspection Date(s)	Control Authority Sampling Frequency	Control Authority Sampling Date(s)	SIU Self-Monitoring Dates(s)
AAA Plating 3141 Ambrose Avenue Nashville, TN 37207	-----	Semi-annual	11/26-29/18 (3)	10/17-18/18 (1)
ALSCO 3101 Charlotte Avenue Nashville, TN 37209	-----	Semi-annual	10/15-19/18 (4)	11/30/18 (1) 2/15/19 (1)
Bridgestone Americas Tire Operations, LLC 1201 Bridgestone Parkway Lavergne, TN 37086	-----	Semi-annual	1/24-30/19 (4)	10/16/18 (1) 2/3/19 (1)
Cargill 2621 Eugenia Avenue Nashville, TN 37211	-----	Semi-annual	3/14-20/19 (4)	10/2/18 (1) 3/18/19 (1)
Chromalox 1382 Heil Quaker Blvd. Lavergne, TN 37086	-----	Semi-annual	10/18-19/18 (1)	10/18-19/18 (1)
Coca-Cola Bottling Co. 407 Craighead Street Nashville, TN 37204	-----	Semi-annual	10/1-4/19/18 (7) 3/19-27/19 (8)	11/13/18 (2)
Combs Industrial Services 1501 Baptist World Ctr. Dr. Nashville, TN 37207	-----	Semi-annual	11/6-14/18 (4) 12/3/18 (VOA)	10/16/18 (1) 11/6-14/18 (4) 12/11/18 (1) 12/27/18 (1) 1/25/19 (1) 2/20/19 (1) 3/26/19 (1)
Country Delite Farms, Inc. 1401 Church Street Nashville, TN 37203	-----	Semi-annual	10/11-17/18 (4)	10/30/18 (1) 11/29/18 (1) 12/18/18 (1) 1/22/19 (1) 2/21/19 (1) 3/15/19 (1)
CSX Transportation, Inc. 3661 Seaboard Drive Nashville, TN 37211	-----	Semi-annual	3/1-8/19 (4)	2/8/19 (1)
Feintool 2930 Old Franklin Rd Antioch, TN 37013	11/8/18	Semi-annual	10/5-7/18 (2)	11/12-13/18(1)

Greer Stop Nut, Inc. 481 McNalley Drive Nashville, TN 37211	10/15/18	Semi-annual	-----	Zero Discharge Statement (Oct.)
Harry's Fresh Foods 2960 Armory Drive Nashville, TN 37204	-----	Semi-annual	3/8-15/19 (8)	Closed business 4/26/19
Hennessy Industries, Inc. 1601 J.P. Hennessey Blvd. Lavergne, TN 37086	-----	Semi-annual	1/25-26/19 (1)	12/27-28/18 (1)
Kennametal, Inc. 1 Teledyne Place Lavergne, TN 37086	10/25/18	Semi-annual	10/22-24/18 (1)	10/23-24/18 (1)
Leonard Plating Co., Inc. 1403 4 <sup>th</sup> Avenue South Nashville, TN 37210	-----	Semi-annual	3/29/19 (1)	10/26/18 (1)
Metal Stripping Systems 3335 Ambrose Avenue Nashville, TN 37207	10/29/18	Semi-annual	11/26/18 (1)	12/4/18 (1)
Metro. Nash. Airport Auth. 1 Terminal Drive Suite 501 Nashville, TN 37214	12/8/18	Semi-annual	12/8-9/18 (1)	12/8-9/18 (1)
Mid-South Wire Co. Drawing Division 1040 Visco Drive Nashville, TN 37210	3/22/19	Semi-annual	10/5-7/18 (2)	10/5/18 (1)
Mid-South Wire Co. Galvanizing Division 1045 Visco Drive Nashville, TN 37210	3/22/19	Semi-annual	10/5-7/18 (2)	10/4/18 (1)
Music City Processing 1629 Elm Hill Pike Nashville, TN 37210	-----	Semi-annual	12/13-19/18 (4)	10/2/18 (1) 1/14/19 (1)
Nashville Wire Products Plating Division 295 Driftwood Avenue Nashville, TN 37210	10/26/18	Semi-annual	10/29-11/1/18 (3)	10/17-18/18 (1)
Palm International, Inc. 1289 Bridgestone Parkway Lavergne, TN 37086	10/4/18	Semi-annual	10/2-3/18 (1)	10/2-3/18 (1)
Pepsi Beverages Co. 715 Thompson Lane Nashville, TN 37204	-----	Semi-annual	10/1/18 (1) 3/15-21/19 (4)	10/4/18 (1) 11/20/18 (1) 12/4/18 (1) 1/3/19 (1) 2/12/19 (1) 3/13/19 (1)

Purity Dairies, Inc. 360 Murfreesboro Road Nashville, TN 37210	-----	Semi-annual	2/13-20/19 (4)	10/30/18 (1) 11/29/19 (1) 12/18/18 (1) 1/25/19 (1) 2/20/19 (1) 3/15/19 (1)
Quality Industries, Inc. 130 Jones Drive Lavergne, TN 37086	-----	Semi-annual	10/22-24/18 (2)	10/24-25/18 (1)
Quality Plating 705 Fort Negley Court Nashville, TN 37203	-----	Semi-annual	10/24/18 (1)	12/3/18 (1)
Shared Hospital Services 641 Mainstream Drive Nashville, TN 37228	-----	Semi-annual	10/29-11/2/18 (4)	10/25/18 (1) 1/29/19 (1)
Southern Aluminum Finishing 1417 Poplar Lane Nashville, TN 37210	-----	Semi-annual	10/22-24/18 (1)	10/23-24/18 (1)
Stratas Foods 189 Spence Lane Nashville TN 37210	-----	Semi-annual	12/6-12/18 (4)	11/2/18 (1) 1/29/19 (1)
Triumph Aerostructures 1431 Vultee Blvd. Nashville, TN 37217	12/7/18	Semi-annual	11/13-15/18 (2)	11/14-15/18 (2)
Unifirst Corporation 813 Massman Drive Nashville, TN 37210	-----	Semi-annual	12/14-20/18 (4)	10/9/18 (1) 11/6/18 (1) 12/11/18 (1) 1/9/19 (1) 2/19/19 (1)
United Record Pressing 453 Chestnut Street Nashville, TN 37210	-----	Semi-annual	10/2-4/18 (1) 10/25-26/18 (1)	10/3-4/18 (1)
U.S. Smokeless Tobacco 800 Harrison Street Nashville, TN 37203	-----	Semi-annual	11/2-8/18 (4)	10/55-23/18 (1) 3/25-26/19 (1)
Vietti Acquisition LLC 636 Southgate Avenue Nashville, TN 37204	-----	Semi-annual	10/3-9/18 (4) 3/26-29/19 (3)	10/18/18 (1) 11/6/18 (1) 12/6/18 (1) 1/8/19 (1) 2/12/19 (1) 3/5/19 (1)
Wolfe Industries, Inc. 1512 J.P. Hennessey Drive Lavergne, TN 37086	3/8/19	Semi-annual	10/2-4/18 (1)	10/3-4/18 (1)

## Form 5 Industrial User Compliance Report

Semi-annual reporters only must complete this form  
(For semi-annual reporting period October 1, 2018 – March 31, 2019)

Column 1	Column 2		Column 3		Column 4		Column 5		Column 6	
	July - September		October - December		January - March		July - December		October - March	
Industrial User	Parameters Total Violated (conc/limit)	Total Number of Samples	Parameters Total Violated (conc/limit)	Total Number of Samples	Parameters Total Violated (conc/limit)	Total Number of Samples	Chronic Violation (Yes or No)	TRC Violation (Yes or No)	Chronic Violation (Yes or No)	TRC Violation (Yes or No)
Combs	0	1	0	3	p-cresol (1) daily max 0.86 / 0.698	2	No	No	No	No
Music City Processing	0	1	0	1	p-cresol (1) monthly avg 0.86 / 0.205	2	No	No	No	Yes
Purity	pH (1) 4.5 / 5-10	7	0	5	0	1	No	No	No	No
Unifirst Corporation	0	7	0	2	pH (1) 10.87 / 5-10	7	No	No	No	No
United Record Press.	0	0	Zinc (2) 6.503 / 5.0 6.834 / 5.0	7	0	2	No	No	No	No
	0	0	Chromium-T (1) 5.66 / 5.0	3	0	0	No	No	No	No
	0	0	Nickel (2) 32.3 / 5.0 9.52 / 5.0	3	0	0	Yes	Yes	Yes	Yes

**Use one line for each parameter for each SIU with violations, showing whether a Technical Review Criteria (TRC) or Chronic Violation resulted: Yes for violations resulting in TRC or Chronic – both are Significant Non-Compliance (SNC) or No for violations not resulting in TRC/Chronic Violations. Please note that monthly average and daily maximum for a specific parameter are considered to be separate limitations. Therefore, SNC would be calculated separately for each limitation. “Conc” stands for concentration.**

## Form 6 Enforcement and Compliance

Industrial User	Verbal Warnings (1) (Enter Number)	Notice of Violation (Enter Number)	Compliance Schedule Conformity (2)	Administrative Orders (Enter Number)	Number of Violations Resolved
Combs	0	0	NA	0	0
Music City Processing	0	1	NA	0	1
Purity Dairies	1	0	NA	0	1
Unifirst Corporation	0	1	NA	0	1
United Record Press	1	1	0	0	1

Combs Industrial had a violation for p-cresol from their self-sampling, but they notified Metro Water of the violation and resampled and were in compliance within the 30 day requirement so no violation letter was issued.

Music City Processing received a violation letter for a late self-sampling report. When they sent the report in they included additional sampling date which had not been sent to Metro Water. Included in this mailing was a violation for pH during the July – September 2018 quarter. This pH violation is shown on form 6 but was not reported in the previous report to the State of Tennessee. It did not create any additional SNC violations.

Purity Dairies had a pH violation from their self-sampling, but since they sample monthly they resampled and were in compliance within the 30 day requirement. They received a verbal warning to contact Metro Water within 10 days of becoming aware of a self-sampling violation.

**1 Verbal warnings include phone calls and site visit discussions.**

**2 Use the following code:**

**In compliance with schedule = Yes**

**Out of compliance with schedule = No**

**Facility not on a schedule = NA**

**Note: Describe compliance schedule in a footnote or in the Narrative Summary, giving the date issued, the violation and due dates for major milestones.**



Department of Environment & Conservation  
Division of Water Resources  
William R. Snodgrass Tennessee Tower  
312 Rosa L. Parks Avenue, 11<sup>th</sup> Floor  
Nashville, TN 37243  
(615) 532-0625

## **CONTROL AUTHORITY PRETREATMENT SEMI-ANNUAL/ANNUAL REPORT**

<b>Control Authority Identification:</b>				
Control Authority Name :	Metropolitan Government of Nashville and Davidson County Department of Water & Sewerage Services			
Report Date :	April 28, 2018			
Reporting Period Covered by this report	From	October 1, 2018	To	March 31, 2019
Reporting Period Covered by previous report	From	April 1, 2018	To	September 30, 2018

Name of Wastewater Treatment Plant(s)	NPDES Permit No.
Dry Creek Wastewater Treatment Plant	TN-0020648

## Form 1a

## Results of Sampling at Control Authority

Sample Date(s): Oct. 15 - 18, 2018 &amp; Jan. 12 - 16, 2019

Column 1	Column 2	Column 3	Column 4	Column 5	Column 6
Parameter	Influent (mg/l)	Protection criteria (mg/l)	Effluent (mg/l)	Pass Through Limit (mg/l)	Removal Rate (%)
Copper (Cu)	0.033	0.49	0.053	0.08	88.7
	0.016		0.044		
	0.020		0.039		
	0.021		0.002		
	0.018		0.002		
	0.034		0.002		
Chromium III	<0.01	*	<0.01	Report only	0.0
Chromium VI	<0.01	*	<0.01	Report only	0.0
Chromium, Total	0.002	0.191	<0.001	0.06	33.3
	0.001		<0.001		
	0.001		<0.001		
	0.002		<0.001		
	<0.001		<0.001		
	0.002		<0.001		
Nickel (Ni)	0.003	0.35	0.002	0.18	22.2
	0.002		0.001		
	0.002		0.001		
	0.004		0.004		
	0.002		0.003		
	0.005		0.003		
Cadmium (Cd)	<0.001	0.015	<0.001	0.005	0.0
	<0.001		<0.001		
	<0.001		<0.001		
	<0.001		<0.001		
	<0.001		<0.001		
	<0.001		<0.001		
Lead (Pb)	0.003	0.0151	<0.001	0.045	34.8
	<0.001		<0.001		
	<0.001		<0.001		
	0.001		<0.001		
	<0.001		<0.001		
	0.002		<0.001		
Mercury (Hg)	<0.0001	0.0005	<0.0001	0.0004	0.0
	<0.0001		<0.0001		
	<0.0001		<0.0001		
	<0.0001		<0.0001		
	<0.0001		<0.0001		
	<0.0001		<0.0001		

Silver (Ag)	<0.001 <0.001 <0.001 <0.001 <0.001 <0.001	0.008	<0.001 <0.001 <0.001 <0.001 <0.001 <0.001	0.005	0.0
Zinc (Zn)	0.110 0.044 0.051 0.070 0.052 0.108	0.5	0.016 0.009 0.011 0.020 0.019 0.017	0.2	78.9
Cyanide (CN)	<0.005 <0.005 <0.005 <0.005 <0.005	0.422	<0.005 <0.005 <0.005 0.0051 <0.005	0.10059	-16.9
Phenols, Total	<0.01 <0.01 <0.01 0.0203 0.0288 0.0512	0.097	<0.01 0.0147 <0.01 <0.01 <0.01 <0.01	0.05	59.4
Toluene	<0.0015 <0.0015	0.121	<0.0015 <0.0015	0.015	0.0
Benzene	<0.0004 <0.0004	0.015	<0.0004 <0.0004	0.003	0.0
1,1,1-trichloroethane	<0.0004 <0.0004	0.200	<0.0004 <0.0004	0.03	0.0
Ethylbenzene	<0.0009 <0.0006	0.029	<0.0009 <0.0009	0.004	0.0
Carbon Tetrachloride	<0.0004 <0.0004	0.019	<0.0004 <0.0004	0.015	0.0
Chloroform	0.0036 <0.0008	0.258	0.0048 0.0015	0.085	-33.3
Tetrachloroethylene	<0.0004 <0.0004	0.125	<0.0004 <0.0004	0.025	0.0
Trichloroethylene	<0.0004 <0.0004	0.091	<0.0004 <0.0004	0.01	0.0
1,2 trans dichloroethylene	<0.0003 <0.0003	0.005	<0.0003 <0.0003	0.0015	0.0
Methylene chloride	<0.0033 <0.0033	0.132	<0.0033 <0.0033	0.05	0.0
Naphthalene	<0.0005 <0.0005	0.005	<0.0005 <0.0005	0.001	0.0
Total phthalates	0.0100	0.563	<0.0005	0.0645	90.7

	0.0007		<0.0005		
Xylene	<0.0007 <0.0007	0.015	<0.0007 <0.0004	*	0.0

Include any parameters sampled in the reporting period including the routine semiannual sampling as well as the effluent sampling specified in Section III of the National Pollution Discharge Elimination System (NPDES) permit, including applicable toxic organics (i.e., toluene, benzene, 1,1,1 – trichloroethane and chloroform).

**You must sample for all parameters in your NPDES Permit at the required frequency (See Part 3 of your NPDES permit for required pretreatment monitoring).**

### Form 1b Bio-solids

What does the Control Authority do with the sludge/bio-solids? Sold for beneficial reuse or landfilled

If bio-solids are land-applied, please fill out the following Table.

Parameter	Bio-Solids Concentration (Mg/kg)	503 Table 1 limits Ceiling Concentration (mg/kg)	503 Table 3 limits Monthly Ave. (Mg/kg)
Arsenic	<0.1 <6.1 <6.1 <6.6 <5.7 <5.3	75	41
Cadmium	<0.1 <6.1 <6.1 <1.0 <1.0 <5.3	85	39
Copper	267.0 291.0 276.5 199.7 204.5 227.8	4300	1500
Lead	16.0 20.0 19.2 12.88 14.4 16.4	840	300

Mercury	0.6	57	17
	0.5		
	0.7		
	0.475		
	0.311		
	0.555		
Molybdenum	9.7	75	N/A
	13.8		
	12.3		
	10.61		
	<5.7		
	<5.3		
Nickel	29.3	420	420
	30.1		
	28.9		
	27.7		
	29.5		
Selenium	<1.0	100	100
	6.2		
	6.8		
	<6.6		
	<5.7		
	<5.3		
Zinc	957.8	7500	2800
	716.5		
	671.5		
	524.4		
	506.3		
	554.9		

Were there any samples of bio-solids that exceeded the ceiling concentrations from 40 CFR Part 503 (Table 1)? No

What date(s)? N/A

**Form 2**

**Report of Upsets, Protection Criteria Violations, Bio-Solids Violations and Pass-Through Limit Violations**

Type of Incident	Date / Limit / Result	Explanation of Incidents	Corrective Action Taken
none			

\* Give a detailed explanation of the causes of the incident and the corrective action taken to date. The corrective action should also include any plans the Control Authority has to identify or correct the problem. If there is not enough room on this form, include the information in the Narrative Summary.

### Form 3 Industrial User Summary

Industrial User Name and Mailing Address	Contact (indicate Mr./Ms.) Phone #/Fax# and email address (optional)	Type of Industry **	Actual Flow (GPD)
A & A Powder Coating 1207 Louisville Hwy Goodlettsville, TN 37072	Mr. Gary Gentry (615) 330-2870	40CFR433 Metal Finishing New Source	0
American Appliance Prod. 1129 Myatt Blvd. Madison, TN 37115	Mr. Phillip Hightower (615) 612-7750	40CFR466.15 Porcelain Enamel New Source	2,013
E.I. DuPont (WAS) 1002 Industrial Road Old Hickory, TN 37138	Mr. Nat Chambers (615) 847-6612	SN Waste Activated Sludge	47,867
Metal Moulding Corp. 1225 Northgate Parkway Madison, TN 37115	Mr. David Smallwood (615) 865-9867	40CFR433 Metal Finishing New Source	2,880
Novo Health Services 1233 Northgate Parkway Madison, TN 37115	Mr. Jay VonOhlen (615) 854-1662	SN Industrial Laundry	51,100
Precision Metal Works 1216 Louisville Highway Goodlettsville, TN 37072	Mr. Andrew Sowell (615) 859-4461	40CFR433 Metal Finishing New Source	2,992
S & H Chrome Plating 817 Madison Industrial Rd. Madison, TN 37115	Mr. Matt Robinson (615) 865-0100	40CFR433 Metal Finishing New Source	1,000
Tradebe Env., LLC 450 Edenwold Road Madison, TN 37115	Mr. Eric Congdon (615) 300-7391	40CFR437 Centralized Waste Treatment Subcategory D Combined waste receipts from sub parts A & B New Source	17,467

**\*\*If a Significant Industrial User (SIU) is Categorical, list the applicable category (i.e., metal finisher, electroplater, leather tanner, etc.). Non-categorical SIUs should be listed as SN (Significant Non-Categorical), with a description of the process (i.e., SN-landfill or SN-hospital). All Non-significant Categorical Industrial Users (NSCIU) should be listed on the form and identified as an NSCIU. Information on NSCIUs is required on Form 3, but not required on any other form in this report. Industries that are not significant and not categorical are not required to be listed in this report. However, if you wish to list them on this form, please identify them as "Other."**

## Form 4 Industrial User Monitoring Report

Column 1	Column 2	Column 3	Column 4	Column 5
Industrial User Name and Mailing Address	Control Authority Inspection Date(s)	Control Authority Sampling Frequency	Control Authority Sampling Date(s)	SIU Self-Monitoring Dates(s)
A & A Powder Coating 1207 Louisville Hwy Goodlettsville, TN 37072	-----	Semi-annual	-----	Zero Discharge Statement (Nov)
American Appliance Prod. 1129 Myatt Blvd. Madison, TN 37115	11/21/18	Semi-annual	11/26-29/18 (2)	11/27-28/18(1)
E.I. DuPont (WAS) 1002 Industrial Road Old Hickory, TN 37138	3/7/19	Semi-annual	3/12-14/19 (2)	10/3/18 (1) 11/7/18 (1) 12/5/18 (1) 1/3/19 (1) 2/6/19(1) 3/6/19 (1)
Metal Moulding Corp. 1225 Northgate Parkway Madison, TN 37115	10/29/18	Semi-annual	12/27-28/18 (1)	10/2-3/18 (1)
Novo Health Services 1233 Northgate Parkway Madison, TN 37115	-----	Semi-annual	11/19-28/18 (4)	10/3/18 (1)
Precision Metal Works 1216 Louisville Highway Goodlettsville, TN 37072	12/4/18	Semi-annual	12/4-6/18 (1)	12/5-6/18 (1)
S & H Chrome Plating 817 Madison Industrial Rd. Madison, TN 37115	-----	Semi-annual	11/26-29/18 (2)	11/28-29/18 (1)
Tradebe Env., LLC 450 Edenwold Road Madison, TN 37115	3/6/19	Semi-annual	2/4-8/19 (4)	10/9/18 (1) 11/7/18 (1) 12/12/18 (1) 1/08/19 (1) 2/1-28/19 (14) 3/7/19 (1)

## Form 5 Industrial User Compliance Report

Semi-annual reporters only must complete this form

(For semi-annual reporting period October 1, 2018 – March 31, 2019)

Column 1	Column 2		Column 3		Column 4		Column 5		Column 6	
	July - September		October - December		January - March		July - December		October - March	
Industrial User	Parameters Total Violated (conc/limit)	Total Number of Samples	Parameters Total Violated (conc/limit)	Total Number of Samples	Parameters Total Violated (conc/limit)	Total Number of Samples	Chronic Violation (Yes or No)	TRC Violation (Yes or No)	Chronic Violation (Yes or No)	TRC Violation (Yes or No)
Tradebe	Zinc (1) Daily 7.46 / 2.87	32	0	3	0	11	No	No	No	No
	Zinc (1) Month. Avg. 0.660 / 0.641	3	0	3	0	3	No	No	No	No

**Use one line for each parameter for each SIU with violations, showing whether a Technical Review Criteria (TRC) or Chronic Violation resulted: Yes for violations resulting in TRC or Chronic – both are Significant Non-Compliance (SNC) or No for violations not resulting in TRC/Chronic Violations. Please note that monthly average and daily maximum for a specific parameter are considered to be separate limitations. Therefore, SNC would be calculated separately for each limitation. “Conc” stands for concentration.**

**Form 6**  
**Enforcement and Compliance**

Industrial User	Verbal Warnings (1) (Enter Number)	Notice of Violation (Enter Number)	Compliance Schedule Conformity (2)	Administrative Orders (Enter Number)	Number of Violations Resolved
none	0	0	NA	0	0

**1 Verbal warnings include phone calls and site visit discussions.**

**2 Use the following code:**

- In compliance with schedule = Yes**
- Out of compliance with schedule = No**
- Facility not on a schedule = NA**

**Note: Describe compliance schedule in a footnote or in the Narrative Summary, giving the date issued, the violation and due dates for major milestones.**



Department of Environment & Conservation  
 Division of Water Resources  
 William R. Snodgrass Tennessee Tower  
 312 Rosa L. Parks Avenue, 11<sup>th</sup> Floor  
 Nashville, TN 37243  
 (615) 532-0625

**CONTROL AUTHORITY PRETREATMENT SEMI-ANNUAL/ANNUAL REPORT**

<b>Control Authority Identification:</b>				
Control Authority Name :	Metropolitan Government of Nashville and Davidson County Department of Water & Sewerage Services			
Report Date :	April 28, 2019			
Reporting Period Covered by this report	From	October 1, 2018	To	March 31, 2019
Reporting Period Covered by previous report	From	April 1, 2018	To	September 30, 2018

Name of Wastewater Treatment Plant(s)	NPDES Permit No.
Whites Creek Wastewater Treatment Plant	TN-0024970

## Form 1a

## Results of Sampling at Control Authority

Sample Date(s): Oct. 15 - 18, 2018 &amp; Jan. 12 - 16, 2019

Column 1	Column 2	Column 3	Column 4	Column 5	Column 6
Parameter	Influent (mg/l)	Protection criteria (mg/l)	Effluent (mg/l)	Pass Through Limit (mg/l)	Removal Rate (%)
Copper (Cu)	0.019	0.325	0.002	0.08	73.2
	0.006		0.003		
	0.007		0.002		
	0.010		0.004		
	0.013		0.004		
	0.016		0.004		
Chromium III	<0.01	*	<0.01	Report Only	0.0
Chromium VI	<0.01	*	<0.01	0.03929	0.0
Chromium Total	0.002	0.167	<0.001	0.06	14.3
	<0.001		<0.001		
	<0.001		<0.001		
	<0.001		<0.001		
	0.002		<0.001		
	<0.001		<0.001		
Nickel (Ni)	0.002	0.155	<0.001	0.18	19.0
	0.001		<0.001		
	0.001		<0.001		
	<0.001		<0.001		
	0.002		<0.001		
	0.001		<0.001		
Cadmium (Cd)	<0.001	0.015	<0.001	0.00374	0.0
	<0.001		<0.001		
	<0.001		<0.001		
	<0.001		<0.001		
	<0.001		<0.001		
	<0.001		<0.001		
Lead (Pb)	0.002	0.10	<0.001	0.045	0.0
	<0.001		<0.001		
	<0.001		<0.001		
	<0.001		<0.001		
	<0.001		<0.001		
	<0.001		<0.001		
Mercury (Hg)	<0.0001	0.001	<0.0001	0.0004	0.0
	<0.0001		<0.0001		
	<0.0001		<0.0001		
	<0.0001		<0.0001		
	<0.0001		<0.0001		
	<0.0001		<0.0001		

	<0.0001		<0.0001		
Silver (Ag)	<0.001 <0.001 <0.001 <0.001 <0.001 <0.001	0.008	<0.001 <0.001 <0.001 <0.001 <0.001 <0.001	0.005	0.0
Zinc (Zn)	0.069 0.021 0.027 0.034 0.041 0.054	0.48	0.015 0.015 0.014 0.034 0.041 0.054	0.2	55.4
Cyanide (CN)	<0.05 0.0071 0.0082 <0.005 <0.005 <0.005	0.275	0.006 0.0105 <0.005 <0.005 <0.005 <0.005	0.01854	-3.4
Phenols, Total	0.0293 0.0188 0.0146 0.0138 0.0645 0.0229	0.222	<0.01 0.0103 0.0102 <0.01 <0.01 <0.01	0.05	63.1
Toluene	<0.0015 <0.0015	0.063	<0.0015 <0.0015	0.015	0.0
Benzene	<0.0004 <0.0004	0.015	<0.0004 <0.0004	0.003	0.0
1,1,1-trichloroethane	<0.0004 <0.0004	0.2	<0.0004 <0.0004	0.03	0.0
Ethylbenzene	<0.0009 <0.0009	0.029	<0.0009 <0.0009	0.004	0.0
Carbon Tetrachloride	<0.0004 <0.0004	0.039	<0.0004 <0.0004	0.015	0.0
Chloroform	0.0015 <0.0008	0.258	<0.0008 <0.0008	0.085	30.4
Tetrachloroethylene	<0.0004 <0.0004	0.125	<0.0004 <0.0004	0.025	0.0
Trichloroethylene	<0.0004 <0.0004	0.091	<0.0004 <0.0004	0.01	0.0
1,2 trans dichloroethylene	<0.0003 <0.0003	0.005	<0.0003 <0.0003	0.0015	0.0
Methylene chloride	<0.0033 <0.0033	0.132	<0.0033 <0.0033	0.05	0.0
Naphthalene	<0.0005 <0.0005	0.005	<0.0005 <0.0005	0.001	0.0

Total phthalates	0.003 <0.0004	0.219	<0.0005 <0.0005	0.0645	73.0
Xylene	<0.0007 <0.0007	0.015	<0.0007 <0.0007	*	0.0

Include any parameters sampled in the reporting period including the routine semiannual sampling as well as the effluent sampling specified in Section III of the National Pollution Discharge Elimination System (NPDES) permit, including applicable toxic organics (i.e., toluene, benzene, 1,1,1 – trichloroethane and chloroform).

**You must sample for all parameters in your NPDES Permit at the required frequency (See Part 3 of your NPDES permit for required pretreatment monitoring).**

### Form 1b Bio-solids

What does the Control Authority do with the sludge/bio-solids? *Solids from Whites Creek are pumped to the Central WWTP bio-solids facility for treatment.*

If bio-solids are land-applied, please fill out the following Table.

Parameter	Bio-Solids Concentration (mg/kg)	503 Table 1 limits Ceiling Concentration (mg/kg)	503 Table 3 limits Monthly Ave. (mg/kg)
Arsenic		75	41
Cadmium		85	39
Copper		4300	1500
Lead		840	300
Mercury		57	17
Molybdenum		75	N/A
Nickel		420	420
Selenium		100	100
Zinc		7500	2800

Were there any samples of bio-solids that exceeded the ceiling concentrations from 40 CFR Part 503 (Table 1)? No

What date(s)?

**Form 2**

**Report of Upsets, Protection Criteria Violations, Bio-solids Violations and Pass-Through Limit Violations**

Type of Incident	Date	Explanation of Incidents	Corrective Action Taken
None	-----	-----	-----

\* Give a detailed explanation of the causes of the incident and the corrective action taken to date. The corrective action should also include any plans the Control Authority has to identify or correct the problem. If there is not enough room on this form, include the information in the Narrative Summary.

### Form 3 Industrial User Summary

Industrial User Name and Mailing Address	Contact (indicate Mr./Ms.) Phone #/Fax# and email address (optional)	Type of Industry **	Actual Flow (GPD)
Aramark Services 6121 Cockrill Bend Circle Nashville, TN 37209	Mr. Rodney Camp (615) 350-6930	SN Industrial Laundry	107,100
Carlex Glass America, LLC 7200 Centennial Blvd. Nashville, TN 37209	Mr. Tony Ren (615) 350-7595	SN Auto Glass Manufacturing	140,500
Cintas Corporation 3400 Briley Park Blvd. N. Nashville, TN 37207	Mr. Steve Johannesen (615) 228-3400	SN Industrial Laundry	54,300
Elite Trailer Sales & Service 1800 Linder Industrial Drive Nashville, TN 37209	Mr. Peter Thurmond (615) 350-8041	40CFR442 Transportation Equipment Cleaning	28,100
Nashville Wire Products (Material Handling Division) 1604 County Hospital Road Nashville, TN 37218	Ms. Angie Hollis (615) 254-7716	40CFR433 Metal Finishing Existing Source	5,800
Servitech Ind., Inc. 550 Brick Church Park Drive Nashville, TN 37207	Mr. Chris Cash (615) 227-9899	40CFR433 Metal Finishing New Source	0
Techno-Aide 7117 Centennial Blvd. Nashville, TN 37209	Mr. Aaron Scalf (615) 350-7030	40CFR433 Metal Finishing Existing Source	100

**\*\*If a Significant Industrial User (SIU) is Categorical, list the applicable category (i.e., metal finisher, electroplater, leather tanner, etc.). Non-categorical SIUs should be listed as SN (Significant Non-Categorical), with a description of the process (i.e., SN-landfill or SN-hospital). All Non-significant Categorical Industrial Users (NSCIU) should be listed on the form and identified as an NSCIU. Information on NSCIUs is required on Form 3, but not required on any other form in this report. Industries that are not significant and not categorical are not required to be listed in this report. However, if you wish to list them on this form, please identify them as "Other."**

<b>Form 4</b>				
<b>Industrial User Monitoring Report</b>				
Column 1	Column 2	Column 3	Column 4	Column 5
Industrial User Name and Mailing Address	Control Authority Inspection Date(s)	Control Authority Sampling Frequency	Control Authority Sampling Date(s)	SIU Self- Monitoring Dates(s)
Aramark Services 6121 Cockrill Bend Circle Nashville, TN 37209	-----	Semi-annual	10/25-31/18 (4)	10/23/18 (1) 1/23/19 (1) 2/15/19 (1)
Carlex Glass America, LLC 7200 Centennial Blvd. Nashville, TN 37209	-----	Semi-annual	10/18-24/18 (4)	10/29/18 (1) 1/9/19 (1)
Cintas Corporation 3400 Briley Park Blvd. N. Nashville, TN 37207	-----	Semi-annual	11/15-21/18 (4)	10/23/18 (1) 1/23/19 (1)
Elite Trailer Sales & Svc. 1800 Linder Industrial Dr. Nashville, TN 37209	-----	Semi-annual	10/17-23/18 (4)	12/27/18 (1)
Nashville Wire Products (Material Handling Div.) 1604 County Hospital Road Nashville, TN 37218	12/17/18	Semi-annual	11/12-14/18 (1)	11/12-13/18 (1)
Servitech Ind., Inc. 550 Brick Church Park Drive Nashville, TN 37207	-----	Semi-annual	-----	Zero Discharge Statement (Feb-19)
Techno-Aide 7117 Centennial Blvd. Nashville, TN 37209	11/28/18	Semi-annual	11/28/18 (1)	11/14/18 (1)

## Form 5 Industrial User Compliance Report

Semi-annual reporters only must complete this form

(For semi-annual reporting period October 1, 2018 – March 31, 2019)

Column 1	Column 2 July - September		Column 3 October - December		Column 4 January - March		Column 5 July - December		Column 6 October - March		
Industrial User	Parameters Total Violated (conc/limit)	Total Number of Samples	Parameters Total Violated (conc/limit)	Total Number of Samples	Parameters Total Violated (conc/limit)	Total Number of Samples	Parameters Total Violated (conc/limit)	Total Number of Samples	Chronic Violation (Yes or No)	Chronic Violation (Yes or No)	TRC Violation (Yes or No)
none	0	0	0	0	0	0	0	0	No	No	No

**Use one line for each parameter for each SIU with violations, showing whether a Technical Review Criteria (TRC) or Chronic Violation resulted: Yes for violations resulting in TRC or Chronic – both are Significant Non-Compliance (SNC) or No for violations not resulting in TRC/Chronic Violations. Please note that monthly average and daily maximum for a specific parameter are considered to be separate limitations. Therefore, SNC would be calculated separately for each limitation. “Conc” stands for concentration.**

## Form 6 Enforcement and Compliance

Industrial User	Verbal Warnings (1) (Enter Number)	Notice of Violation (Enter Number)	Compliance Schedule Conformity (2)	Administrative Orders (Enter Number)	Number of Violations Resolved
none	0	0	0	0	0

**1 Verbal warnings include phone calls and site visit discussions.**

**2 Use the following code:**

- In compliance with schedule = Yes
- Out of compliance with schedule = No
- Facility not on a schedule = NA

**Note: Describe compliance schedule in a footnote or in the Narrative Summary, giving the date issued, the violation and due dates for major milestones.**



**Steven Diviney-Sewer Superintendent**

April 18, 2019

Mr. Jim Snyder  
Associate Director  
Department of Water and Sewerage Services  
1600 Second Avenue North  
Nashville, TN 37208-2206

Re: Semiannual Report-Pretreatment

Dear Mr. Snyder,

I have enclosed the pretreatment semi-annual report for the City of Goodlettsville.

Should you require additional information, please advise.

Sincerely,

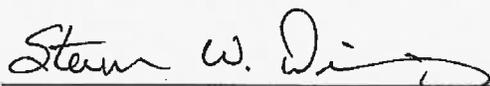
Steven W. Diviney  
Sewer Superintendent

Enclosure

Cc: Jeff McCormick  
Tim Ellis

## MUNICIPAL SIGNATURE FORM

I certify under the penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to ensure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.



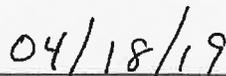
Company Official (signature)

**Steven W. Diviney / Sewer Superintendent**

Company Official (printed name & title)

**88-069**

Permit Number



Date of Submittal

**POTW PRETREATMENT SEMI-ANNUAL REPORT**

Control Authority Name: City of Goodlettsville  
Report Date: April 18, 2019  
Period Covered By This Report: From 10/1/18 To 03/31/19  
Period Covered By Previous Report: From 04/1/18 To 09/30/18

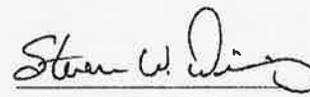
Name of Wastewater Treatment Plant(s): Dry Creek  
NPDES Permit Number: TN 0020648

Person to contact concerning information contained in this report:

Name: Steven W. Diviney  
Title: Sewer Supervisor  
Mailing Address: 215 Cartwright Street  
Goodlettsville, TN 37072  
Phone: 615-859-2740

I have personally examined and am familiar with the information submitted in this document and attachments. Based upon my inquiry of those individuals immediately responsible for obtaining the information reported herein, I believe that the submitted information is true, accurate and complete.

04/18/19  
Date

  
Steven W. Diviney  
Sewer Superintendent

## **PRETREATMENT NARRATIVE SUMMARY**

The City of Goodlettsville has one significant contributor, Tyson Fresh Meats, Inc. This facility started production in May 2001.

No violations for the reporting period.

**FORM #1**

**RESULTS OF SAMPLING AT POTW**

**NAME OF TREATMENT WORKS**  
**SAMPLE DATE**

Goodlettsville Collection System  
\*See Attached Laboratory Results

Parameter	Influent MG/L	Protection Criteria MG/L	Effluent MG/L	Pass- Through MG/L	Removal	Sludge
Copper (Cu)						
Chromium (Cr)						
Nickel (Ni)						
Cadmium (Cd)						
Lead (Pb)						
Mercury (Hg)						
Zinc (Zn)						
Cyanide (CN)						
Phenols, Total						

Any applicable toxic organics (i.e., toluene, benzene, 1,1,1 trichloroethane, chloroform, ect.)

**FORM #2**

**REPORT OF UPSETS, PASS-THROUGH AND PROTECTION CRITERIA  
EXCEEDENCES**

Type of Incident	Date	Explanation for Incidents	Corrective Action Taken
NONE			

**FORM #3**

**INDUSTRIAL USER UPDATE**

Industrial User Name/Address	Contact	**Type of Industry	Flow G/D
<b>Tyson Fresh Meats 201 Cartwright St. Goodlettsville, TN 37072</b>	<b>Steve Ligon EHS Manager 615-855-2811</b>	<b>SN Meat Cutting and Packing</b>	<b>453,385</b>

\*\*If an SIU is Categorical, list the applicable category (i.e., metal finisher, electroplater, leather tanner, etc.). Significant non-categorical SIUS should be listed as SN. If an industry is not significant, but the POTW wishes to include it on this form for tracking purposes, list the type of industry as "other".

**FORM #4  
INDUSTRIAL USE MONITORING REPORT**

Industrial User	POTW Sampling Frequency	POTW Inspection Date(s)	POTW Sampling Dates(s)	Industrial Self- Monitoring Date(s)
Tyson				<b>10/3-4/18</b>
Tyson				<b>11/19-20/18</b>
Tyson				<b>12/4-5/18</b>
Tyson				<b>1/3-4/19</b>
Tyson	<b>Semi-Annual</b>	<b>2/1/19</b>	<b>1/31-2/1/19</b>	
Tyson				<b>2/5-6/19</b>
Tyson				<b>3/4-5-19</b>

**FORM #5-A  
INDUSTRIAL USER COMPLIANCE REPORT**

1 Industrial User	2 January-March		3 April-June		4 July-September		5 January-June		6 April-September	
	Parameters Violated Conc./Limit	Total # of Samples	Parameters Violated Conc./Limit	Total # of Samples	Parameters Violated Conc./Limit	Total # of Samples	# of Chronic Violations*	# of TRC Violations**	# of Chronic Violations*	# of TRC Violations**

\* 2/3 of samples exceed limit

\*\* 1/3 of samples exceed limit X 1.5 (1.2 for metals)

**FORM #5-B  
INDUSTRIAL USER COMPLIANCE REPORT**

		Reporting Period									
		2		3		4		5		6	
		July-September		October-December		January-March		July-December		October-March	
1	Industrial User	Parameters Violated Conc./Limit	Total # of Samples	Parameters Violated Conc./Limit	Total # of Samples	Parameters Violated Conc./Limit	Total # of Samples	# of Chronic Violations*	# of TRC Violations **	# of Chronic Violations*	# of TRC Violations **
	TYSON	0	3	0	3	0	3	NO	NO	NO	NO

\* 2/3 of samples exceed limit

\*\* 1/3 of samples exceed limit X 1.5 (1.2 for metal)

**FORM #6**

**ENFORCEMENT AND COMPLIANCE**

Industrial User	Verbal Warnings	Notices of Violation	*Compliance Schedule	Administration Order	Number of Violations Resolved	Significant Non-Compliance
<b>Tyson</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>N</b>

**\*Use the following code:**

<b>In compliance with schedule</b>	<b>=Yes</b>
<b>Out of compliance</b>	<b>=No</b>
<b>Facility not on a schedule</b>	<b>= 0 or NA</b>

**FORM #7**  
**PRETREATMENT PERFORMANCE SUMMARY**

**I. General Information**

Control Authority Note	City of Goodlettsville
Address	215 Cartwright Street
City	Goodlettsville, TN 37072
Contact Person	Steven W. Diviney
NPDES Number	TN 0020648
Reporting Period	10/1/18 To 3/31/19
Total Categorical IUS	0
Total Significant Noncategorical IUS	1

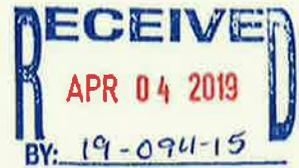
II. <u>Significant Industrial User Compliance</u>	<u>Significant Industrial User</u>	
	<u>Categorical</u>	<u>Noncategorical</u>
1.) Number of SIUS in Significant Noncompliance	0	0
2.) Reasons for Noncompliance		
a.) Effluent Discharge Violations	0	0
b.) Reporting	0	0
c.) Compliance Schedule	0	0
d.) Other (explain in narrative)	0	0

**III. Monitoring**

1.) Facilities Monitored		
a.) Number of SIUS Sampled	0	1
b.) Number of SIUS Inspected	0	1
2.) Total Monitoring Events		
a.) Number of Samples	0	1
b.) Number of Inspections	0	1

**IV. Enforcement**

1.) IU's Subject to any Enforcement Actions	0	0
2.) Significant Violators Listed in the Newspapers	0	0
3.) Notices of Violators Issued*	0	0
4.) Administrative Orders Issued*	0	0
5.) Compliance Schedules Issued*	0	0
6.) Suite Filed:		
a.) Civil*	0	0
b.) Criminal*	0	0
7.) Other Actions Taken (sewer bans, etc.)*	0	0
8.) Penalties Collected:		
a.) Facilities	0	0
b.) Total Dollars	0	\$0.00
*Inspection Forms Attached		0



**Industrial Pretreatment Semi-Annual Report  
City of Mt Juliet / Public Works Department**

**Date of Submittal:** April 1, 2019

**Control Authority Name:** Metro Nashville Water Services

**Period Covered By This Report:** October 1, 2018 – April 1, 2019

**Period Covered By Pervious Report:** April 1, 2018 - October 1, 2018

**NPDES PERMIT NUMBER:** # TN0020575

**METRO PERMIT NUMBER:** # MP-0010

Person to contact concerning information in this report:

Mr. George Page  
Pretreatment Coordinator  
City of Mt Juliet  
gpage@mtjuliet-tn.gov  
Mt. Juliet, TN 37122  
(615)773-7957

I certify that under the penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with the system designed to ensure that qualified personnel properly gather and evaluate the information submitted. Based upon my inquiry of those individuals immediately responsible for obtaining the information reported herein, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

George Page  
Pretreatment Coordinator

Date

# **CITY OF MT. JULIET**

## **SEMI-ANNUAL REPORT**



### **PRETREATMENT PROGRAM ENVIRONMENTAL COMPLIANCE**

**October 15, 2018 – April 1, 2019**

Submitted to:  
Metro Water Services  
Industrial Compliance Section

*Submitted on April 1, 2019*

*Prepared by:*  
George Page  
Industrial Pretreatment  
71 East Hill Street  
Mt. Juliet, TN 37122

## POTW PRETREATMENT SEMI-ANNUAL REPORT

Control authority name: City of Mt. Juliet  
Report due date: April 1, 2019  
Period covered by this report: October 15, 2018 to April 1, 2019  
Period covered by previous report: from March 1, 2018 to October 15, 2018

Name of Wastewater Treatment Plant NPDES PERMIT # TN0020575

City of Mt. Juliet Public Works NA

### Person to contact concerning information in this report:

Name: George Page  
Title: Pretreatment Coordinator  
Mailing address: 71 East Hill Street  
Mt. Juliet, TN 37122  
Telephone no.: (615) 773-7957

I have personally examined and am familiar with the information submitted in this document and its attachments. Based upon my inquiry of those individuals immediately responsible for obtaining the information reported herein, I believe that the submitted information is true, accurate, and complete.

Date: April 1, 2019 Signature of Official 

George Page  
Pretreatment Coordinator

## PRETREATMENT PROGRAM NARRATIVE SUMMARY

### Industrial Waste Survey

The Public Works/Industrial Compliance Division, receives New Building Permit license requests daily from our Business License office for review or inspections. Industrial/Commercial or food service businesses are then red-flagged and reviewed or inspected. During daily business runs, Building Codes and Pretreatment inspectors perform windshield surveys. Permitting, inspection and evaluation of non-significant industrial users are performed throughout the year.

During the past six months (10/15/18 – 4/1/19), the City of Mt. Juliet had one-hundred and five (105) new business license requests. None of these currently or in the foreseeable future qualifies as a Significant Categorical User.

### **Non-Permitted Industrial Users (2)**

#### **1. Teknia Nashville Automotive**

94 Belinda Pkwy

Mt. Juliet, TN 37122

Prior three month water usage average was 1,558 gpd.

The City of Mt. Juliet will accept a signed Zero Discharge Certification Statement that the industry does not discharge TTOs into the POTW.

Industrial User inspection was performed by the City of Mt. Juliet on February 14, 2019.

#### **2. DeStaCo Inc.**

210 Mundy Memorial Drive

Mt. Juliet, TN 37122

Prior three month water usage average was 958.89 gpd.

The City of Mt. Juliet will accept a signed Zero Discharge Certification Statement that the industry does not discharge TTOs into the POTW.

Industrial User inspection was performed by the City of Mt. Juliet Pretreatment Division on January 11-2019.

**Significant Categorical User – (0)**

## PERMITTED Non-Significant Non-Categorical Industrial User (NSIU) – (3)

### 1. Universal Rack Inc.

70 Athens Drive  
Mt. Juliet, TN.

Prior three month water usage average was 86.66 gpd of wastewater. No process water used.

The City of Mt. Juliet will accept a signed Zero Discharge Certification Statement that the industry does not discharge TTOs into the POTW.

Industrial User inspection was performed by the City of Mt. Juliet Pretreatment Division on February 4, 2019.

Current industrial user permit was renewed and is in effect until March 31, 2022.

### 2. Pace National Inc. (Formally Environmental Science Corp.)

12065 Lebanon Road  
Mt. Juliet, TN.

Pace discharges an average of 5,782.0 gpd of process wastewater.

The City of Mt. Juliet accepts a semi-annual self-monitoring sample analysis.

Inspections were performed by the City of Mt. Juliet Pretreatment Division on March 6, 2019.

Current industrial user permit is in effect until February 28, 2020.

- a. Excess Sample Disposal: Pace uses electronic Notebook (paperless) record keeping for sample volumes neutralized and disposed. All wastewater and drinking water sample disposal also electronically kept with the number of drums (~50 gallons) that are neutralized with NaOH and the final pH 7.0 -7.5 which is discharged to the sewer. ESC may discharge up to 4 neutralized drums per day, with some days no waste sample discharge being done. On average about two 55 gallon batches of neutralized wastewater are discharged. Samples are segregated so that any that have been identified as hazardous waste are put in hazardous waste disposal bin and hauled offsite by Waste Management and QRS Rivergate Recycling.
- b. Pace has expanded their campus acreage by two buildings. One newly built building is the Rad Lab. One other renovated building will house offices only. Both will be connected to the City's sewer system. ESC will be hiring a few more employees, and will be using more water.

### 3. John Deal Coatings

206 East Division Street  
Mt. Juliet, TN.

Last three month water usage average was 843 gpd of process wastewater.

The City of Mt. Juliet accepted a signed Zero Discharge Certification Statement, that the industry does not discharge TTOs into the POTW.

Current industrial user permit is in effect until February 28, 2020.

Inspections were performed by the City of Mt. Juliet Pretreatment Division on March 7, 2019.

**Changes in the Pretreatment Program**

None

**New Significant Industrial Users during last six (6) months.**

None

**Sewer Line Preventive Maintenance Program**

1. The City's Sanitary Sewer Maintenance Group includes a Manhole Crew that conducts inspections, CCTV, cleanings, smoke testing, I & I repairs to sewer lines and manholes.
2. The City of Mt. Juliet Sewer Maintenance Division in the last six months (October 15, 2018 to April 1, 2019), inspected, CCTV, smoke tested or cleaned 34,005 feet or 6.5 miles of sanitary sewer line.
3. The City of Mt. Juliet Fats Oil & Grease Control Program currently permits and inspects one hundred and thirty (130) food service establishments, (restaurants, schools and retirement homes). The FOG Permit fee is \$40 per month which is added to the facilities sewer bill in an effort to recover a portion of inspection and maintenance cost.

**FORM # 1**

**Results of POTW Sampling**

Name of Treatment Plant:

City of Mt. Juliet Old Lebanon Dirt Road Metering Station

Sample Date:

01/16/19 to 01/17/19

Parameter	Influent (mg/l)	City of Mt Juliet Limit (mg/l)	Effluent (mg/l)	Pass through (mg/l)	Removal rate (%)	Sludge (mg/kg dry wt.)
Cadmium	0.00200	0.25	NA			
Lead	0.00500	1.5	NA			
Zinc	0.152	5.0	NA			
Ammonia nitrogen	5.99	300	NA			
BOD5	129	300	NA			
Oil & Grease	15.0	100	NA			
Suspended solids	67.3	325	NA			
Dissolved Sulfide	0.0500	0.050	NA			
pH	6.91 S.U.	5.0-10.0	NA			
Flow	3,402.000 MGD	-	NA			

**FORM #2**

**Report of Upsets, Pass Through, and Protection Criteria Accidence's**

<b>Type of Incident</b>	<b>Date</b>	<b>Explanation for Incident</b>	<b>Corrective Action Taken</b>
Manhole bypass	01/15/2019	Clog in 10" line	Jet cleaned line
Manhole bypass	02/01/2019	Manhole lid off, debris clog	Cleaned/replaced lid
Manhole bypass	02/08/2019	4.5" rain event	I & I. Identified source

**FORM #3**

**Industrial User Update**

<b>Industrial User Name/ Address</b>	<b>Contact</b>	<b>Category</b>	<b>Flow (gpd)</b>
<b>Environmental Science Corp.</b> <b>12065 Lebanon Road</b> <b>Mt. Juliet, TN 37122</b> <b>(615) 758-5858</b>	<b>Jim Burns</b> <b>Quality Assurance /</b> <b>Auditor</b>	<b>NSIU</b>	<b>5782.0-Process</b> <b>GPD</b> <b>3-Month avg.</b>
<b>Universal Rack Inc.</b> <b>70 Athens Drive.</b> <b>Mt. Juliet, TN 37122</b> <b>(615) 754-6660</b>	<b>Mike Lloyd</b> <b>Plant Manager</b>	<b>NSIU</b>	<b>Zero Discharger</b> <b>86.6 GPD</b> <b>3-Month avg.</b>
<b>John Deal Coatings</b> <b>206 East Division Street</b> <b>Mt. Juliet, TN 37122</b> <b>(615) 754-9797</b>	<b>Doug Patrick</b> <b>Maintenance Facilities</b>	<b>NSIU</b>	<b>Zero Discharger</b> <b>906.7 GPD</b> <b>3-Month avg.</b>
<b>DeStaCo</b> <b>210 Mundy Memorial Drive</b> <b>Mt. Juliet, TN 37122</b> <b>(615) 553-9800</b>	<b>Marshal Myhan</b> <b>Maintenance Technician</b>	<b>NSIU</b>	<b>Zero Discharger</b> <b>1817.78 GPD</b> <b>3-Month avg.</b>
<b>Teknia Automotive</b> <b>94 Belinda Pkwy</b> <b>Mt. Juliet, TN 37122</b> <b>(615) 405-4294</b>	<b>Aaron Volz</b> <b>Manufacturing Engineer</b>	<b>NSIU</b>	<b>Zero Discharger</b> <b>1587.7 GPD</b> <b>3-Month avg.</b>

**FORM #4**

**Industrial User Monitoring Report**

<b>Industrial User</b>	<b>POTW Sampling Frequency</b>	<b>POTW Inspection Date(s)</b>	<b>POTW Sampling Date(s)</b>	<b>IU Self- Sampling Date(s)</b>
Pace National	Semi-annual	03/06/2019	NA*	02/07/2019
Universal Rack Inc.	Zero Discharger	02/04/2019	NA**	NA
John Deal Coatings	Zero Discharger	03/07/2019	NA**	NA
DeStaCo	Zero Discharger	02/19/2019	NA**	12/21/2018
Teknia Automotive	Zero Discharger	02/06/2019	NA**	NA

NA\*: City Monitoring acceptable for Self-Sampling (see IU permits)

NA\*\*: City accepts a Zero Discharge Statement

FORM #5

Industrial User Compliance Report

Industrial User	REPORTING PERIOD									
	June - August		September - November		December - February		June - November		September - February	
	Parameters Violated (Conc./limit)	Total Number of Samples	Parameters Violated (Conc./limit)	Total Number of Samples	Parameters Violated (Conc./limit)	Total Number of Samples	Chronic Violations (Yes or No)	TRC Violations (Yes or No)	# of Chronic Violations (Yes or No)	# of TRC Violations (Yes or No)
Pace National.	0	1	0	0	0	1	No	No	No	No
Universal Rack Inc.	0	0	0	0	0	0	No	No	No	No
John Deal Coatings	0	1	0	0	0	0	No	No	No	No
DeStaCo	0	0	0	0	0	1	No	No	No	No
Teknia Automotive	0	0	0	0	0	0	No	No	No	No

<sup>1</sup>Chronic Violation - Defined as those in which 66 percent or more of all the measurements taken during a 6 month period exceed (by any magnitude) the daily maximum limit or the average limit for the same pollutant parameter.

<sup>2</sup>TRC Violation - Technical review criteria violations are those in which 33 percent or more of all of the measurements taken during a 6 month period equal or exceed the product of the daily average maximum limit or average limit times the applicable TRC (TRC = 1.4 for BOD, TSS, and oil and grease; 1.2 for all other pollutants except ph.

**FORM #6**

**Enforcement and Compliance**

<b>Industrial User</b>	<b>Verbal Warnings</b>	<b>Notices of Violation</b>	<b>Compliance Schedule*</b>	<b>Administrative Order</b>	<b>Number of Violations Resolved</b>
Pace National	0	0	N/A	0	0
Universal Rack Inc.	0	0	N/A	0	0
John Deal Coatings	0	0	N/A	0	0
Teknia Automotive	0	0	N/A	0	0
DeStaCo	0	0	N/A	0	0

\* Use the following code:

- Incompliance with schedule = yes
- Out of compliance = no
- Facility not on a schedule = 0 or NA

**FORM # 7**  
**PRETREATMENT PERFORMANCE SUMMARY**

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**I. General Information**

Control Authority Name: City of Mt. Juliet / Public Works  
Address: 71 East Hill St.  
City: Mt. Juliet, TN 37122  
Contact Person: George Page  
Contact Telephone Number: (615) 773-7957  
NPDES Number: # TN0020575  
Reporting Period: October 15, 2018 to April 1, 2019  
Total Categorical IUs: 0  
Total SNC IUs: 0

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**II. Significant Industrial User Compliance**

	<u>Categorical</u>	<u>Non-categorical</u>
1) Significant noncompliance for:		
a) Any reason	0	0
b) Effluent discharge violations	0	0
c) Reporting	0	0
d) Compliance schedule	0	0

---

**III. Monitoring**

1) Facilities monitored:		
a) Number of SIU's sampled	0	0

	b)	Number of SIU's inspected	0	0
2)	Total monitoring events:			
	a)	Number of samples	0	0
	b)	Number of inspections	0	0

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#### IV. Enforcement

1)	IUs subject to any enforcement action		0	0
2)	Significant violators listed in paper		0	0
3)	Notices of violation issued		0	0
4)	Administrative orders issued		0	0
5)	Compliance schedules issued		0	0
6)	Suits filed:			
	a)	Civil	0	0
	b)	Criminal	0	0
7)	Other actions taken (sewer bans, etc.)		0	0
8)	Penalties collected:			
	a)	Facilities	0	0
	b)	Total dollars	0	0