



Wastewater Hearing Authority Minutes

Meeting Date: September 19, 2024

Call to Order: 1:31 pm

Adjourn: 2:30 pm

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

In Attendance: **MWS Representatives:** Chase Block, Brent Freeman, Tara Ladd, Sara Wilson, Marty Mast, Jim Snyder, Al Pogue, Ted Taylor, Andy Welch, David Tucker, and Scott Potter.

I. Review and Approval of Minutes

The minutes from the March meeting were approved without correction.

II. FOG Policy Draft Update

Chase Block summarized all of the changes made to the FOG Policy Draft update by reviewing the requested outline of additions and corrections to the policy. Each item was presented with a brief explanation of the changes that have been made in revision II. The Environmental Compliance Department has enacted many policy changes that have yet to be properly codified. An example of the currently implemented changes includes the use of newer technology and equipment, such as digital monitoring devices.

Any policy changes that significantly change the operation of the MWS Environmental Compliance FOG Policy have not been enacted and were presented before the Authority for comment. An example of a major policy change is the requirement for all food service industries to have strainers in their sinks. These simple household items will significantly reduce the solids being captured in the collection system, and the absence of them during an Environmental Compliance inspection will result in a fine.

After reviewing all fifteen sections of policy revision summaries, the WWAHA members complimented Mr. Block on his exceptionally detailed and well-thought-out policy. The Authority voted to promulgate the policy, and the motion passed unanimously.

For questions or a copy of the MWS Environmental Compliance FOG Policy Update, please contact EnvironmentalCompliance@nashville.gov.

III. FOG Enforcement Update

Typically, FOG enforcement is only covered bi-annually, but chairperson Dr. Thackston requested a follow-up on any Industrial Compliance Users with a current permit violation in this meeting. A



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total of 117 outstanding violations were presented to the Authority, with the caveat that about 60% of these violations were minor faux pas, such as needing to certify a grease trap through greasetrapclass.com. For businesses that are not presenting any issues to the collection system, the MWS Environmental Compliance department is not fervently pursuing the certification of grease traps. Instead, it focuses on significant permit violations that pose a threat to the collection system and publicly-owned treatment works. However, there is a visitation limit for all issues that result in a Notice of Violation (NOV.)

A draft Enforcement Response Guide will be presented to the Wastewater Hearing Authority for ratification at its next meeting, scheduled for December 19th. Once approved, it will be provided to permit holders as a reference for requirements and violation penalties.

Additional violations were reviewed, with 11 NOVs associated with a single entity: a waste hauler failing to certify the grease traps it inspects and hauls. Egregious NOVs were discussed, such as the Santa Fe Cattle Company at Opry Mills, which is housed in a historic building with an approximately 4,000 gal. grease interceptor. The management of this establishment has a high turnaround. It is often combative about their permit requirements, arguing that they have operated a certain way for the longevity of the business and the new restrictions are excessive. MWS Environmental Compliance has noted that the volume of grease in their interceptors does not correlate to the amount of steak being produced. This suggests that their grease is not making it to the interceptor. The repair of this issue will either require significant construction or demolition, which is not something the company is enthusiastic to resolve.

The issue of permit holders facing costly construction to resolve their grease issues is fairly common throughout Nashville and Davidson County.

Dr. Thackston inquired about Sperry's consistently being on the Industrial Compliance Violation List, and Mr. Welch explained that this particular business is often in and out of compliance for varying reasons. Currently, they are in violation for not having a flow control device.

Any permit holders with limited English proficiency are presented with a Notice of Violation in their preferred language. NOVs are currently templated in Spanish, Korean, Arabic, and Chinese. The new FOG Policy will soon be available in these languages as well. Dr. Wingfield inquired about the language options for the grease trap certification website. Mr. Block encouraged the WWHA to push for additional language options, as the course is currently only available in English.