



Wastewater Hearing Authority Minutes

Meeting Date: May 12, 2026

Call to Order: 2:01 pm

Adjourn: 2:52 pm

Authority Members: Dr. Robert Wingfield, Dr. Jianwei Li, Dr. Katy Duryea, and Jennifer Dodd

In Attendance: **MWS Representatives:** Ted Taylor, Andy Welch, Chase Block, Will Ellis, Marty Mast, Megan Woodring, Brooke Powell, Tim Fearn, Jesse England, Landon Murray, Brent Freeman, Hannah Zeitlin, and Sara Wilson

Tradebe Treatment & Recycling LLC Representatives: Jeremy Steele, Steven Evans, and Maggie Tenant

I. Public Comment Period

No members of the public attended the special-called hearing.

II. Review and Approval of Agreed Order 2026-01

Agreed Order 2026-01 was developed following a discussion on May 7, 2026, between Metro Water Services and Tradebe Treatment and Recycling of Nashville, LLC. Under the order, Tradebe agreed to pay a total penalty of \$12,137.50 related to Notices of Violation (NOVs) from March and June 2025 for exceedances of cobalt, copper, lead, tin, and titanium, as well as a violation for failure to monitor.

The original penalty of \$100,050.00 was reduced by \$87,912.50 based on the following factors:

- **Compliance History:** Reduced from 0.2 to 0 because Tradebe had no NOVs in the 15 months preceding the violations.
- **Discharge Frequency:** The original assessment incorrectly assumed 21 discharge days; Tradebe discharges only four times per month.
- **Good Faith Efforts:** The good-faith factor was reduced from 0.5 to 0.1 due to operational corrective actions, including staff changes, a three-month shutdown for system corrections, disposal of accumulated water, deep cleaning of tanks, equipment repairs, and revisions to sampling, testing, treatment, and operating procedures.

MWS Environmental Laboratory Superintendent Ted Taylor expressed confidence in Tradebe's ability to maintain compliance.



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WWHA Vice-Chair Dr. Robert Wingfield focused the discussion on Tradebe's revised sampling procedures and their exceedances for mercury (Hg) and cobalt (Co). A technical summary from MWS Environmental Compliance Officer Will Ellis is provided below.

Technical Summary

Note: A monthly average is calculated from all sample results collected during a calendar month.

If only one sample is collected, its result represents the monthly average.

December 2025 Mercury Limit Exceedance & Late Report

Since resuming discharge on October 1, 2025, Tradebe received two December 2025 NOV's:

- **Late Report:** The report was submitted 32 days after sample collection; results must be received within 30 days.
- **Mercury Monthly Average Exceedance:**
 - Reported Minimum Detection Limit (MDL): <0.0013 mg/L
 - Permit monthly average limit: 0.000739 mg/L

Tradebe's contract laboratory diluted the sample to reduce interference from solids, a process that increases the detection limit. Because the MDL exceeded the permit limit, MWS used the MDL as the reported value, resulting in a calculated exceedance.

Date	Analyte	Permit Daily Limit	Permit Monthly Average Limit	Provided MDL (sample result)
12/11/25	Mercury (Hg)	0.00234	0.000739	<0.0013

Table 1 (all values are in concentrations of mg/L)

October 2025 Cobalt Monthly Average Explanation

Tradebe resumed discharge in early October 2025 after reporting zero-discharge certifications from July through September. MWS and Tradebe planned a split sample for the first discharge of the month.



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Sampling Events:

- **October 1–2, 2025 (Split Sample):**
 - Tradebe's contract laboratories reported:
 - Pace Analytical: 0.207 mg/L
 - MicroMethods: 0.144 mg/L
 - Tradebe's average: 0.1755 mg/L
 - MWS result: 0.190 mg/L
 - Combined daily result: 0.18275 mg/L
 - This value was below the daily limit (0.192 mg/L) but above the monthly average limit (0.124 mg/L).
- **October 22, 2025 (Self-Sample):**
 - Result: Non-detect with MDL of 0.05 mg/L
 - MWS used the detection limit as the reported value.

Monthly Average Calculation:

- Results: 0.18275 mg/L and 0.05 mg/L
- Monthly average: 0.116375 mg/L
- This is below the monthly average limit of 0.124 mg/L.

MWS believes elevated cobalt in the early-October sample may reflect residual material from Tradebe's June 2025 discharge, which included multiple exceedances.

Date	Analyte	Permit Daily Limit	Permit Monthly Average Limit	Provided MDL (sample result)	Calculated Monthly Average
10/02/25	Cobalt (Co)	0.192	0.124	<u>Pace Analytical</u> 0.207 <u>MicroMethods</u> 0.144	0.18275
10/22/25	Cobalt (Co)	0.192	0.124	Non-Detect 0.05	0.116375

Table 2 (all values are in concentrations of mg/L)



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Following these technical discussions, Dr. Wingfield moved to accept the penalty assessment, and the Authority approved it.

III. Penalty Assessment Appeal Postponed: Sitar Restaurant

Representatives of Sitar Restaurant requested an appeal of their \$1,500 penalty assessment but did not appear before the WWHA. The Authority moved to defer the appeal to the June meeting. If the representatives do not appear before the Wastewater Hearing Authority in June 2026, the Authority will review the penalty assessment in their absence. MWS Environmental Compliance pledged to ensure that the representatives of Sitar Restaurant receive thorough notice and communication regarding their Hearing opportunity.