



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105

July 13, 2004

Frank J. Doyle, P.E.  
Director  
City and County of Honolulu Department of Environmental Services  
1000 Uluohia Street, Suite 303  
Kapolei, Hawaii 96707

Re: Sewage Sludge Pelletization Project

Dear Mr. Doyle:

The City and County of Honolulu (Honolulu) committed to develop a reuse program for its sewage sludge as part of a Supplementary Environmental Project (SEP) pursuant to Consent Decree CIV. NO. 94-00765DAE. As one of its long range options, Honolulu selected an anaerobic digester and heat drying/pelletization treatment system to produce Class A pellets that would be available for a wide variety of uses. This technology is used in many municipalities across the country. We are concerned that the system has been delayed considerably, and urge Honolulu to move forward with the goals of the SEP.

The sludge heat drying process planned for Sand Island, as you know, is basically the same process as that which has been used by the City of Milwaukee for several decades to produce the widely distributed product Milorganite. The process has also been used successfully by treatment plants in Florida, Pennsylvania, and elsewhere. EPA published this process as one of its original "Processes to Further Reduce Pathogens" in EPA's original sewage sludge regulations of 1979, in 40 CFR 257. The method continued to prove effective and was later incorporated as one of the Class A methods in the 1993 "Standards for Use or Disposal of Sewage Sludge", 40 CFR 503.

The process proposed for Sand Island adds a number of refining steps to the original Milwaukee process, such as providing preliminary anaerobic digestion to further stabilize the pellets and capture methane, and best available control technology for controlling air emissions. While Milwaukee's product meets the pollutant concentrations in 40 CFR 503, the Sand Island sewage sludge is even cleaner with respect to pathogens due to its having a mostly domestic influent. The process also offers the obvious benefits of reducing pathogens at the plant site itself, so that pathogen-containing material does not need to be shipped to other locations on Oahu.

Please call me at (415) 972-3505 with any questions or to discuss this further.

Sincerely,

A handwritten signature in cursive script that reads "Kathi Moore".

Kathi Moore  
Chief  
Clean Water Act Compliance Office