

Subject: RE: Letter sent
From: "Kent Misegades" <kmisegades@bellsouth.net>
Date: Wed, 27 Jan 2010 15:44:41 -0400
To: "Bob Kelly" <rlk@mindspring.com>

Here is what I sent. We are sending similar info soon to the Cary Council in response to Shivar's statement. Kent

Sent 1/27/2010 by KM

Dear Mr. Wicker:

I am writing in reference to the Western Wake Regional Waste Water Treatment Facility. I am a graduate mechanical engineer with over 30 years of experience in a wide range of industries, including material processes planned for usage in the treatment of biosolids in this plant. I have lived in the town of Cary, NC since 1996, a few miles from the proposed site of the facility in New Hill, NC.

Together with my colleagues in the voluntary consumer advocacy group The Cary Watchmen (www.carywatch.com), I have analyzed in detail the proposals made by the Western Wake Partners for the treatment of biosolids.

I am concerned that the Final EIS is an incomplete document in that it fails to establish how sludge and resulting bio solids will be handled.

There is a clear difference between alternate bio solids treatment proposals for the WWWRP. Proposal #1 which results in off-site composting can be characterized as a true recycling process with no destruction of materials. This is proven technology with essentially no risk.

Proposal #2 is a risky new technology that is being tested on a small scale in a city with a population of 15,000. The process incinerates the bio solids ending up with ash, gaseous products of combustion and heat energy. Proposal #2 is characterized as a "thermal drying facility similar to our South Cary WRF". This is a misleading statement meant to imply that this is old low risk technology. When in fact it is new technology with very high risks.

This drying/incineration process is entirely new technology practiced in only one small city (Buffalo, MN Pop 15,000). The drying of bio solids conducted on a stainless steel belt at 350 F. The dried bio solids are then incinerated to provide heat for the drying step.

In contrast, at South Cary, the bio solids are converted to dried pellets using a high temperature gas fired dryer. Low temperature drying is usually expensive with slow production rates and is commonly used where product degradation must be limited and/or value of the product is great, neither of which is a characteristic of Bio Solids. Exit gases would be expected to contain the usual Carbon Dioxide, Carbon Monoxide, Nitrous Oxides and micro solid particulates. Since the BTU content (heat of combustion) of the bio solids is low (comparable to "straw or wood") the amount of material needed for evaporation of water will be substantially greater than if oil or gas is used as a heat source. As a result the total pollutants discharged may be more not less.

The Western Wake Partners have a decision to make in regard to disposing of Bio Solids from the proposed Wastewater Treatment plant at New Hill. Which of the two proposals should be chosen? Should Proposal #1 be chosen, which advocates recycling of bio solids by conversion into mulching materials, compost, land application, and potting materials* using well established low risk processing. Or should Proposal #2 be chosen, which advocates destruction of bio solids by incineration using a new process that has been commercially used in small scale for only a few years.

Until the disposal method has been chosen and adequately described in such a manner that the public has an opportunity to review and provide comments, the Final EIS should be put on hold.

Going forward with an incomplete EIS is a disservice to the public the sewage plant will serve, as well as those who are being forced to have the sewage plant located in their community.

Sincerely,

Kent Misegades
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