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689 Craig Road
St. Louis, MO 63141

September 11, 2008

Mr. Chad Stobbe
Land Quality Bureau
Iowa Department of Natural Resources
502 East 9th Street
Wallace State Office Building
Des Moines, IA 50319-0034

Re: Proposed changes to *Iowa Administrative Code* 567 Chapter 108.

Dear Mr. Stobbe:

Thank you for taking time to visit about the proposed *Chapter 108* rules with representatives from Alter Trading Corporation.

Alter Trading, founded in 1898, is one of the largest scrap metal processors in the country, with trading offices and processing plants across the central United States. We take pride in our proactive environmental policies and ISO-14001 certification and value our long-standing relationship with the Iowa Department of Natural Resources (DNR).

With respect to the proposed rules, Alter is concerned about any changes to *Chapter 108* or *113* that may result in further restrictions in our ability to provide alternative daily cover (ADC) in the form of automobile shredder fluff to landfills in Iowa. Numerous studies have been completed within Iowa and throughout various states to demonstrate the ability of shredder fluff to serve as a viable ADC, and shredder fluff continues to be used, or is mandated to be used, in many states as ADC. In addition, shredder fluff remains an environmentally sound, viable and advantageous alternative to tarps and soil covers.

As part of these proposed rules, Alter encourages the DNR to expand opportunities for and not encumber the ability of landfills to use shredder fluff as an ADC. In addition, Alter requests that the DNR add a specific time period to which it either approves or denies the continued use of a proposed ADC following completion of a demonstration period.

Again, Alter appreciates having the opportunity to comment on the proposed rules before the rules are officially filed. We commend the DNR for including stakeholders in this process.

Sincerely,
Alter Trading Corporation

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Sarah Schlichtholz
Environmental Manager

cc: Ms. Kathy Morris, Director, Waste Commission of Scott County
Mr. Robert Glebs, President/CEO, Iowa Waste Systems
Mr. Myron Parizek, P.E., Benton County Sanitary Landfill
Mr. Richard Heller, Environmental Director, Iowa County Sanitary Landfill

