

SOUTH DALLAS COUNTY LANDFILL

May 12, 2009

Chad Stobe
Land Quality Bureau, IDNR Wallace Building
502 E. 9th St.
Des Moines, Iowa 50319

RE: Comments regarding 567-101.114(2)

Dear Mr. Stobe:

If a C&D only landfill continues to be exempt from fees, it seems appropriate that a MSW landfill that disposes of C&D in a separate area should be exempt as well. If this exemption has been considered a "misinterpretation" of the rule, then it has been so for many years. I believe the interpretation is correct in order to maintain an equity between C&D and MSW landfills.

As usual, IT'S ALL ABOUT THE MONEY. DNR was unable to get legislation passed to collect fees from C&D landfills, so in order to increase revenues you are "re-interpreting" the rules? How sad that you are selecting the construction industry to increase fees, one of the most hard hit in these tough economic times. On the other hand, a C&D only landfill continues to be exempt.

It is understandable that tonnage fee revenues have remained flat. Was waste reduction not your goal? Didn't you anticipate this? Why haven't you proposed to increase overall tipping fees? Surely the legislators could respect a request for a percentage increase in overall fees as reasonable and would be justifiable given cost of living increases over the past few years. AN INCREASE OF \$.25 PER TON WOULD, for non-exempt waste, generate the revenue you are wanting. Instead you have selected C&D deposited in MSW landfills because you can manage that administratively.

Until you are successful in changing legislation exempting C&D only landfills from fees, I feel it is inappropriate to collect fees from MSW landfills for that same material.

Sincerely,

Vickie L. Moorhead
Director