

**ADAIR COUNTY SANITARY LANDFILL & RECYCLING CENTER**

**1645 STATE HIGHWAY #25**

**MENLO, IA 50164**

**641-743-8343 641-743-0133 - FAX ACSL@MDDC.COM**

9 August 2003

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DEPT OF  
NATURAL RESOURCES

Iowa Department of Natural Resources  
Energy & Waste Management Bureau  
Attn: Jeff Myrom  
502 East Ninth Street  
Des Moines, IA 50319

RE: DRAFT MSW LANDFILL EXPANSION AND LINER GUIDANCE

Dear Mr. Myrom:

I am writing to you regarding the captioned, which will significantly affect this site. My concerns are the following:

My first concern is that this proposed IDNR policy was only recently presented to the public on July 16, 2003 with written comments only being accepted until August 29, 2003. IDNR proposes to implement this policy within a month. What is the big hurry on this issue? Has the EPA all of a sudden required the State of Iowa to be in compliance on non-Subtitle D landfills? Is there going to be Federal money's designated to the State to help landfills be in compliance within the next ten years, or do the locally owned facilities have to foot the bill again?

My second concern is that the draft indicates that once this policy is rule, all previously reviewed and approved landfill designs in the past year will be required to re-design their expansions to meet these new requirements. Why should the facilities have the burden of this unnecessary expense when if the IDNR had shared their intentions over a year ago with the industry some of the requirements would have been addressed when submitting permit renewals within the past year?

My third and most important concern is the environmental issues. If the IDNR is truly concerned with non-Subtitle D landfills contaminating the groundwater, why don't they enforce the current rules that require correction on any contamination that is going on currently? Is there any facility in the State of Iowa that needs to be in compliance that isn't? Each landfill is unique in its own way with different soils and groundwater conditions why does IDNR want to label landfills all the same across the state when in fact they are not the same?



Each facility across the State of Iowa should be looked at based on their volume of waste received from their planning area, and not judged just because they are not the largest landfill in the State. Locally run governmental landfills have also believed that owning their own waste facility was in their best interests while following State rules and regulations and doing so without harming the environment.

If you should have any questions regarding any of my concerns, please feel free to contact me.

Sincerely,

A handwritten signature in cursive script that reads "Barbara Jean Funke".

Barbara Jean Funke  
Director