

**BLACK HAWK COUNTY SOLID WASTE MANAGEMENT COMMISSION**

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DATE: September 15, 2004

TO: DNR/ Jeff Myrom  
515-281-6794

FROM: Gary Lee Wilcox



SUBJECT: Rules changes concerns

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Jeff,

I am not sure to whom our concerns should be addressed, so will start with you. We have heard rumors that the rules changes proposed to bring Iowa's requirements in line with Subtitle D may eliminate the use of alternative liner systems with demonstrations of equivalence. This deeply concerns us because we don't want to be forced to degrade the integrity of our facility by being forced to use the inferior composite liner.

We are very fortunate in having good clay liner material available, with the insitu material being at least ten times better than the  $1 \times 10^{-7}$  required for liners. Our engineering analyses indicate that the plastic sheet will never provide protection equivalent to an additional 2 feet of clay, particularly when there appears to be no practical method of providing mechanical protection for the plastic during placement of the leachate media and the first lift of solid waste. Since the primary concern with leachate is heavy metals, we also do not want to give up the cation exchange capacity afforded by the additional two feet of clay.

This note may be premature because we haven't seen any draft rules, but want to make sure we are on record requesting to participate in the process should such changes be ultimately proposed.

cc: Earth Tech/ Bamsey