

From: "Scott A. Smith" <boonelf@tdsi.net>
To: "Jeff Myrom" <Jeff.Myrom@dnr.state.ia.us>
Date: 10/13/04 12:05PM
Subject: Comments on Landfill Liner Revisions

Dear Jeff:

The following are my comments pertaining to the memo you recently distributed concerning the landfill rules revision and Subtitle D equivalent liners.

Boone County supports all landfills constructing Subtitle D equivalent liners as soon as possible and agree with the EPA that another ten-year window is too long. The strategy and timeline the Department has developed is one that I hope the EPA will accept and act favorably upon.

My chief concern at this point is with regards to the piggy-backing issue. Our landfill has invested a great deal of time and effort into designing a system that will allow us to maximize airspace while ensuring that "new" garbage does not impact "old" garbage. In our case, any piggy-backing will be over final capped areas with an intermediate drainage layer designed to direct leachate associated with new garbage disposal onto our Subtitle D equivalent liner and its leachate collection system. We have also identified strategies that will provide significant additional physical separation between new garbage and old.

Based on the discussion at the Technical Committee held on October 7th, it appears that Boone County's strategy is in keeping with the Department's with regard to this issue. I would encourage the Department to continue to allow this flexibility.

Thank you for the opportunity to comment. Please do not hesitate to contact me if you should need additional information or have any questions.

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