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BRETT VETTE  
MANAGER



**BREMER COUNTY  
SANITARY LANDFILL  
& REGIONAL  
COLLECTION  
CENTER for HHW**

BILLING OFFICE:

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8/26/03

To: Jeff Myrom - IDNR  
Energy & Waste Management Bureau

From: Brett Vette  
Bremer County Landfill Manager

Re: MSW Landfill Expansion and Liner Guidance Document Comments

2003 AUG 28 PM 3:10  
DEPT OF NATURAL RESOURCES

Dear Sir:

The following comments relate to the Bremer County Sanitary Landfill, Permit No. 9-SDP-1-75P.

If adopted as is, the July 16, 2003 Draft Guidance Document will drastically change the direction of solid waste in Bremer County.

Bremer County was issued an amendment to its permit on January 30, 1991 by Morris Preston, IDNR, to allow vertical expansion over approximately 20 acres of originally sited area. All required monitoring wells were installed and testing is done on a semi-annual basis.

Aerial photos were taken in 1991 and 1996, and we have just completed an aerial photo this summer. This landfill has 30 years of remaining space. The loss of twenty years of landfill space and \$10.5 million dollars in revenues is too much for a small county. Some of this revenue was ear-marked for either a transfer station or the siting of another landfill. Without it, solid waste costs will skyrocket.

Several times in this document it is said, Iowa's current administrative rules for MSW landfills are technically comparable to Subtitle D regulations, however, they *could* be improved by more closely mirroring the Federal standards... Does this mean that IDNR Officials are being forced to make these changes by the Federal Government or are they doing it on their own? If IDNR is not being forced to make these changes then why are they doing it and why are they not offering a variance to landfills like us?

According to the latest INRCOG Comprehensive Solid Waste Management Plan, Bremer County residents have achieved a 47.39 percent reduction rate. Residents were told by recycling more material they would extend the life of the landfill and hold down solid waste disposal costs.

If Bremer County had done very little to promote recycling and residents had sat on their hands like some other counties this would not be an issue, we would be closed in about 10 years. However, we as a county did what we were asked to do by the IDNR. We took the responsibility to recycle very seriously and now that conviction will bite us if this draft is made into rule. Bremer County will suffer a huge financial loss, two fold. One, the 10.5 million in revenues and two, the increase in rates to cover the cost of either a transfer station or a new landfill.

Keeping our ground water protected is a top priority, but with this many years of remaining capacity I would suggest a variance be offered to a landfill. Additional monitoring wells or more frequent testing could be required with a variance. This needs to be an option.

Your choice to close landfills without being forced to by the EPA or others shows a lack of concern for small counties and the impact this action will have on them. This is a change in direction that will affect all of the people in our county for many years to come.

Thank you for the opportunity to express our concerns and I hope that you consider the ramifications your actions will have on our county.

Sincerely,



Brett Vette

Bremer County Landfill Manager