

Clinton County Area Solid Waste Agency

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Iowa Department of Natural Resources
Jeff Myrom
502 East 9th. St.
Des Moines, Iowa 50319

October 1, 2004

Dear Mr. Myrom,

The Clinton County Area Solid Waste Agency located in Clinton County, Iowa is submitting comments regarding the draft milestones and timeline for MSW landfill rule revisions. My name is Laura Liegois and I serve as the Director of Operations and Education for the Clinton County Area Solid Waste Agency.

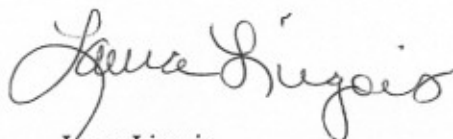
We in Clinton County understand the importance of complying with good environmental stewardship and have tried to our best to create an environmentally sound solid waste agency for our residents. Our landfill opened on December 13, 1974. The ravine 2,3,and 4 landfill cell area closed in 19885. We have been ravine 5 and 6 since that time. During the past 10 years, CCASWA has received a vertical expansion for this area. One item of concern for us, is that Iowa DNR knew that in that time frame, all landfills should be in the Subtitle D standards, but allowed for us to receive this expansion that dates back to landfill maintenance and operations plan for Clinton County Area Solid Waste Agency 1996-1999. The expansion should not have been granted if DNR knew these rules were going to be eventually put into place.

In 2002, CCASWA submitted a proposal for an expansion that would give us more life to the current cell, due to we were being responsible and not using the closed area that had received expansion approval, due to some leachate problems. At the time of planning and preparing in August of 2002, our engineer and myself meet with a DNR staff to discuss our plan. At this meeting verbal approval was given to continue planning and to submit the proposal to DNR staff. In April 2003 DNR meet again with our engineer and myself to discuss our plan, At this meeting, DNR told us that they were no longer going to allow expansions and were going to require no more then 20 years of life. In December 2003, I received a letter from DNR stating that our landfill cell had 10 years of life. Now our agency faces 2 years to plan and finance a new landfill cell. After our agency has spent time and money to plan for our future, that has been discarded by the department. The department needs to set a time frame and stick with it. Moving the timeline every six months is not helpful, productive, or feasible for any solid waste agency.

Our agency understands the importance to taking care of our environment and has been moving forward this past summer with planning for a new Subtitle D cell. In this plan, we had prepared for 10 years of life to fill our current cell; this of course will be difficult to complete the current cell in 2 years. This plan was created from the letter that our agency received from the DNR on December 12, 2003, with all of this in mind, our agency may have to move to measures such as not composting waste for the next two years to help fill the current cell, to fill the current location. The project of composting was to reduce the waste in the landfill and double its cell life. Not only has CCASWA been doing this, but has been giving this idea to the public in Clinton County for the past 7 years. Now we are going to have to tell them that we need to build a new landfill cell. That this new cell is going to cost more money for Clinton County, which the cost is most likely fall on the residents of Clinton County. This cost that we will need to provide for in two years could have been planned for many years ago. Our agency is not prepared for the cost since we had planned on at least 40 years of life in our current landfill cell.

We do understand the importance of being in compliance with the environmental rules, but we also feel the Iowa Department of Natural Resources should have moved forward a long time ago with the new rules and regulations for landfills, instead of giving expansions of the past 10 years. This has lead to solid waste agency's planning on having many years of life in a landfill cell and being able to fund other solid waste programs.

Sincerely,



Laura Liegois
Director of Operations and Education
Clinton County Area Solid Waste Agency

Laura Liegois
Clinton County Area Solid Waste Agency
P.O. Box 996 Clinton, Iowa 52733

CC: CCASWA's Files
CCASWA's Board of Directors
State Legislative Representatives
State Senators