

# SOUTH DALLAS COUNTY LANDFILL

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November 28, 2008

Alex Moon  
Land Quality Bureau  
IDNR—Wallace Building  
502 E. 9<sup>th</sup>  
Des Moines, Iowa 50319

RE: Comments on Chapter 114 revisions

Dear Alex:

I have reviewed the proposed versions of revisions for C&D waste.

While I believe some revision to Chapter 114 is needed, I feel the "merge" into Chapter 113 will cause C&D Landfills or units to comply with regulations required of MSW Landfills or units that are unnecessary or even unintended.

With the most recent changes to Chapter 113 and subsequent proposed revisions to these new rules to clarify issues, I believe it important to keep Chapter 114 separate. I realize that this may cause some repetition but I believe this is a better way to clarify the rule requirements for C&D landfills or units and allow stakeholders to analyze the intent of any proposed new requirements.

Sincerely,



Vickie L. Moorhead  
Director