

Alex Moon  
Land Quality Bureau  
IDNR Wallace Building  
502 E.9 th St.  
Des Moines, Ia. 50319

RE: proposed chapter 114 comments

Dear Alex,

Speaking as the Contract Manager, and former Contract Operator of the Monona County Sanitary Landfill Agency, I would like to express my concerns related to the Department's options for C@D Landfills and related changes to chapter 114.

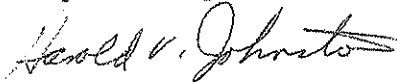
Recent actions taken by the Department for rule changes in all areas of the Code can only be perceived to be what it is. First, the elimination of C@D Sites by making them inclusive with MSW Sites. Second, a "money grab" for the Department by the elimination of the tonnage fee exemption. And third, while more subtle and perhaps more long range, a plan to eliminate most of the smaller landfills in the State. This would consolidate the money, power, and over-site duties of the Department.

Unless there is clear evidence, not just speculation, that a C@D Site is having an adverse effect on ground water or the environment, sites should be allowed to operate until approved clousure plans are met and or next construction periods are reached.

Of the four versions offered by the Department, Version three is the one that would be best suited to our situation in Monona County. However, the "over-kill" of the design required and the cost associated with it is a major concern. Also the requirements of the time table imposed is of a major concern. What do you do with several years of available air space; fill it in with dirt? Time tables for implementation should be tied to previously approved clousure plans and or new construction periods.

Additional cost for disposal of C@D because of 1. excessive design cost, 2. added tipping fees to a waste fee fund, 3. hauling cost to approved sites( 50 to 100 miles), will only increase the already to common practice of on site burning, burial, or illegal dumping in ditches and ravines.

Respectfully



Harold V. Johnston/Contract Manager  
Monona County Sanitary Landfill Agency  
31342 Hwy 37  
Turin, Iowa 51040