



Metro Waste Authority

No Wasted Resources

December 1, 2008

Delivered via email: alex.moon@dnr.state.ia.us

Alex Moon
Iowa Department of Natural Resources
Land Quality Bureau
Wallace State Office Building
502 East 9th Street
Des Moines, IA 50319-0034

RE: Comments on Proposed Versions of Rules Revisions
Chapter 114 – Sanitary Landfills: Construction and Demolition Waste

Dear Mr. Moon:

Metro Waste Authority (MWA) appreciates the opportunity for stakeholders to provide comments. MWA supports the Iowa Department of Natural Resources (DNR) in revising the Construction and Demolition Waste rules to provide standards that are protective of the environment.

Of the four options presented, MWA supports Version 2 with the understanding that these existing facilities would have to meet all other standards of Chapter 113, including groundwater monitoring requirements. MWA would encourage all solid waste landfills to use a composite liner system. The performance of composite liners has been extensively investigated. The following excerpt that illustrates the superiority of composite liner systems over compacted clay only liners (CCL) is from a report commissioned by the EPA¹:

*For over a decade it has been known through theoretical analyses, laboratory tests, and limited field data that **composite liners are superior** to either GMs alone or **CCLs alone** for the containment of leachate or other liquids (Brown et al., 1987; EPA, 1987; Giroud and Bonaparte, 1989a,b; Bonaparte and Gross, 1990; Bodaparte and Othman, 1995). This report has presented significant new field data that confirms the very good performance characteristics of GM/GCL, GM/CCL, and GM/GCL/CCL composite liners versus current types of single liner materials.*

¹ Bonapart, R., Daniel, D.E., and Koerner, R.M. (2002). "Assessment and Recommendations for Optimal Performance of Waste Containment Systems," U.S. Environmental Protection Agency, National Risk Management Research Laboratory, Cincinnati OH, EPA/600/R-02/099. (available online at <http://www.epa.gov/ORD/NRMRL/pubs/600r02099/600R02099.pdf>).

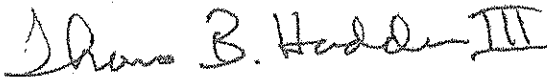
300 East Locust Street, Suite 100
Des Moines, Iowa 50309-1864
515-244-0021
515-244-9477 fax
www.mwatoday.com



As discussed in Section 1.4.1.4, the basic premise of using a composite liner is that leakage through a hole or defect in the GM upper component is impeded by the presence of a CCL or GCL lower component. The GM improves the performance of the composite liner relative to that of a CCL or GCL alone by greatly limiting the portion of the CCL or GCL exposed to leachate, and, for CCL's, lowering the potential for desiccation cracking.

MWA appreciates this opportunity to comment on the proposed versions. As you consider the comments provided and have questions, please contact me at 515-244-0021.

Sincerely,

A handwritten signature in cursive script that reads "Thomas B. Hadden III". The signature is written in dark ink and is positioned above the printed name and title.

Thomas B. Hadden III
Executive Director