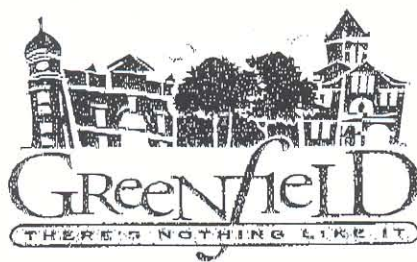


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March 1, 2007

The city of Greenfield is a member of a 28E of the Adair County Landfill and Recycling Center. It is a small landfill accepting about 7000 tons per year.

The proposed Chapter 113 rules will put small landfills such as ours in a tight financial situation. Greenfield would encourage IDNR to consider the following items which will impact all landfills but especially ours. IDNR and EPA negotiated a deadline of October 1, 2007, for all landfills on unlined areas to close. However IDNR did this prior to developing and finalizing their revised solid waste rules. By having this deadline date prior to final rules, IDNR has placed our landfill in extremely difficult circumstances with limited ability to comply with unknown rules agreed to by IDNR and EPA. Our landfill had to submit plans based upon unknown rules which have resulted in confusion and concern on whether our design will continue to be in compliance in the future.

Greenfield would propose that the deadline date be changed to October 1, 2009. This would allow IDNR and EPA approval of the new Chapter 113 rules. Thus IDNR staff would have actual rules to follow when reviewing plans and designs. Also our landill which has plans pending IDNR approval will then be approved and constructed based upon known regulations. Adair County Landfill will also have adequate time to competitively bid and construct the landfill before being forced from our existing vertical expansion.

We also feel that 113.6(b) be reworded as follows:
Sanitary disposal projects designed and constructed in accordance with rules in effect at the time of construction shall not be required to be redesigned or reconstructed due to subsequent rule changes unless the department finds that such facilities are causing pollution. Such facilities shall be brought into compliance with rules in effect at the time of reconstructing, enlarging, or otherwise modifying the sanitary disposal project, or at the time of permit renewal.

Greenfield appreciates the opportunity to voice our concerns with regard to Chapter 113. Our landfill is critical to economic development of our area and we wish to keep it as a landfill not a transfer station.