



STATE OF IOWA

THOMAS J. VILSACK, GOVERNOR
SALLY J. PEDERSON, LT. GOVERNOR

DEPARTMENT OF NATURAL RESOURCES
JEFFREY R. VONK, DIRECTOR

June 2, 2006

Chet McLaughlin
US EPA Region 7
Solid Waste Program
901 N. 5th Street
Kansas City, KS 66101

Re: State of Iowa Solid Waste Proposed Rule Revisions

Dear Chet:

Thank you for meeting with Iowa Department of Natural Resources landfill staff on May 25, 2006. As you are aware we are planning to present our proposed rule revisions to the Environmental Protection Commission this summer to initiate formal rulemaking proceedings on our 567 IAC Chapter 113 solid waste rules.

However, we need to provide direction to many Iowa landfill responsible officials who are currently attempting to design or construct waste cells to be Subtitle D compliant. Therefore, based on our May 25, 2006 meeting with you, we request written confirmation as to whether our proposed rules regarding abutment liners will meet EPA requirements. Furthermore, we need clarification of the need to tie-in abutment liners to basal liners. It is our understanding that as long as the plan view of the waste boundary is coincident with the Subtitle D liner, EPA considers that cell compliant. (See Attachments 1 & 2)

In addition, we request written confirmation that alternative liner approvals are left up to the State applicant as long as the point of compliance modeling shows that the alternative liner will provide adequate protection to the groundwaters and surface waters of that state.

We have many permit expansion applications that staff are reviewing and we want to provide them with assurance that what we approve at this point will remain acceptable after our October 1, 2007 compliance date.

If you have any questions, you may contact me at (515) 281-8927.

Sincerely,

A handwritten signature in cursive script that reads "Brian Tormey".

Brian Tormey
Chief
Energy and Waste Management Bureau

Liner Scenarios for EPA Evaluation for the State of Iowa
June 2, 2006

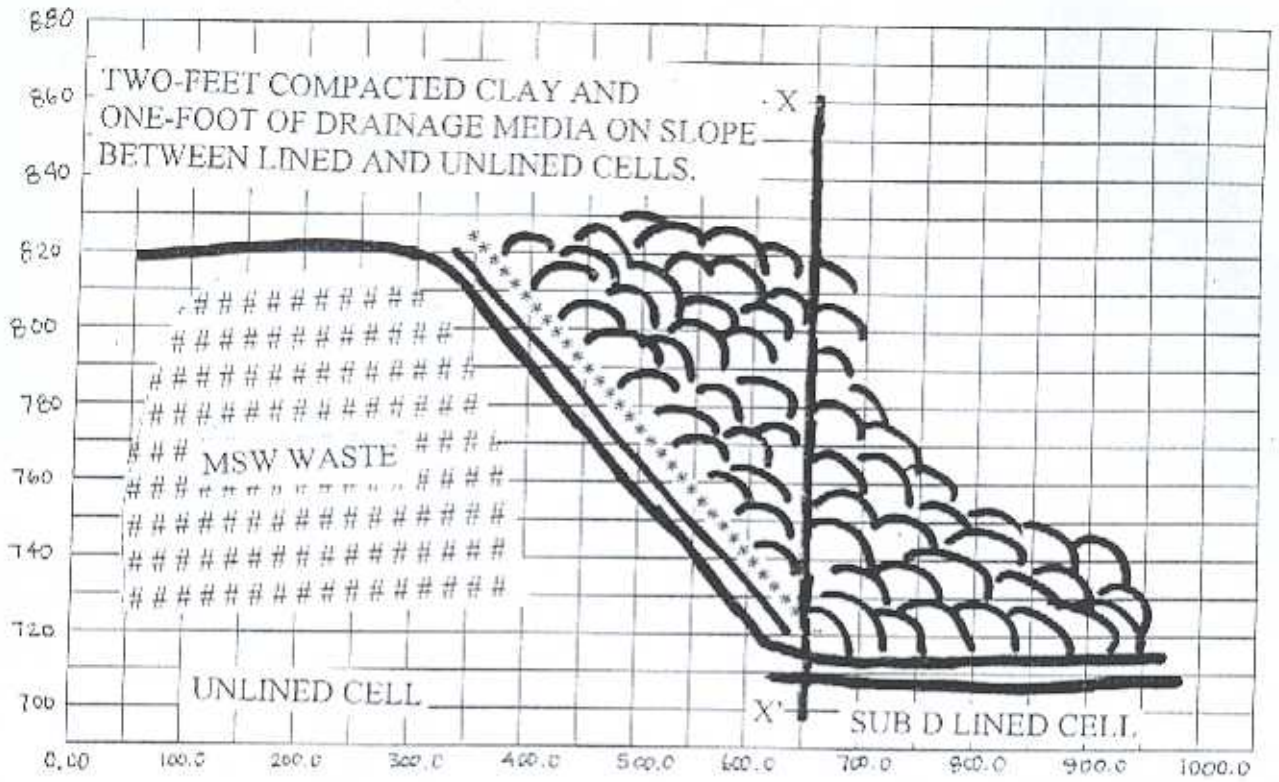
Scenario A

Scenario shows a Sub-D lined cell abutting an existing unlined cell. Two feet of compacted clay and a one-foot equivalent drainage layer was placed prior to placement of waste on the existing slope of the unlined cell. Future waste placement will only occur to the right of the boundary line labeled X-X'. A plan view of this scenario would indicate that future waste placement is occurring only on the lined cell. As such, is this a Sub D compliant site?

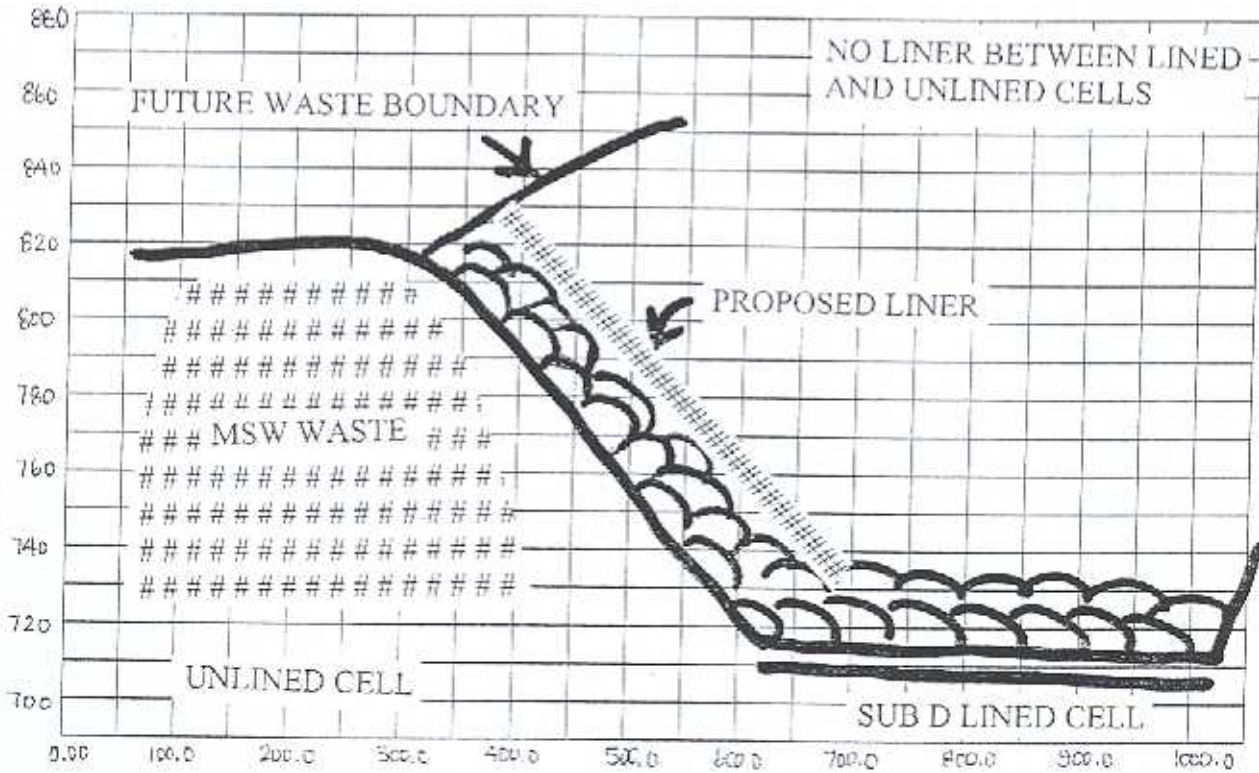
Scenario B

Scenario shows a Sub-D lined cell abutting an existing unlined cell. No barrier layer was placed prior to placement of waste on the existing slope of the unlined cell. A plan view of this scenario would indicate that future waste placement is still occurring over the unlined cell. In addition, the base of the lined cell has had some waste placement as well. As such, if a liner is placed on the existing waste to separate the lined cell from the unlined cell, does the liner have to be tied in at the based of the lined cell? Or can the liner end on top of the waste where the lined cell begins and merely be tied down with additional waste?

A



B



ATTACHMENT #2

STATE OF IOWA

June 2, 2006