

Fremont County Landfill

October 8, 2004

Jeff Myrom
Iowa Department of Natural Resources
502 East 9th St.
Des Moines, Iowa 50319

Mr. Myrom:

We would like to take this opportunity to reply to your notice of September 3, 2004 concerning milestones and timeline for MSW landfill revisions. The Fremont County Landfill Commission is the governing body for the 28-E organization created by and under accordance to Iowa Code for Fremont County Landfill, Fremont County, permit no.#36-SDP-01-74P.

The Fremont County MSW Landfill exists under current regulations to provide the citizens of our county a reasonable-cost efficient method of waste disposal. As a small, rural county, with a small financial base, it is difficult at best to operate a cost-intensive landfill, but we have an excellent track record, are financially stable, and our clay liner is operating within the margin of error allowed for Sub-title D liners, which are expected to leak to a certain degree. Although we understand that when our current "footprint" is filled, in about 15 years, we may have to install a sub-title D liner, we feel that the timeline imposed in your notice of September 3, 2004, is unreasonable for small MSW Landfills like ours that are operating within the rules, and especially because installation of a Sub-title D liner would not enhance our performance to any demonstrable degree.

Your timeline would cause unfair financial hardship due to some or all of the following:

- Loss of thirteen years airspace and revenue
- Engineering costs for redesigning the present site
- Acceleration of closure post/closure accounts
- Financing of a new site with Sub-title D specifications
- Financial implications of having to switch to and construct a transfer station

Fremont County Landfill receives approximately 6500 ton/year. We do not feel we should be grouped into the same category with the "many" MSWs that are having trouble, as we are performing within the rules:

- In 1996 we constructed a leachate collection system, under IDNR specifications and direction, for \$44,000 that has yet to have ANY leachate delivered to a POTW. WE do not have any seeps or boils.
- Every year we test and send reports to the IDNR on our test wells. We have 13 wells and of those only ONE shows any contamination. We do not have any 1,2 DCE(dichloroethane)

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and that one well only has a small amount of arsenic which can be found in many rural drinking wells.

- We test an adjacent stream up gradient and down gradient of the landfill with no contamination.
- We test three neighbors' private wells both up gradient and down gradient of the landfill with no contamination.

It is the goal of the Fremont County Landfill Commission to provide for the people of Fremont County a solid waste system that satisfies and meets the needs of our County now and for the future. However, we request provision of a reasonable timeline for us to evaluate all the options, to prepare financially, and to physically construct the chosen facility. At a minimum, ten years or more should be allowed for a landfill of our size especially when our remaining airspace and the original timeline is close enough to allow normal, or close to normal, closure.

Sincerely



Ross Silcock- Chairman Fremont County Landfill Commission

Attested



Michael Fox- Manager FCSL

The following cities that form the 28-E organization for Fremont County Landfill support and back this response of the Fremont County Landfill Commission.

SIDNEY by R. D. Jones H. H. Jones

TABOR by W. L. Starn

RIVERTON by Clarence Parkerson

FARRAGUT by Marilyn A. Phipps, City Clerk

RANDOLPH by Vance a. Grody Mayor

THURMAN by Carolyn E. Umphrey Mayor

IMOGENE by Terri D. Doe - city clerk/treasurer

FREMONT COUNTY
BOARD of SUPERVISORS Keith Hickey

HAMBURG by Sally Hollander