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City of Greenfield

Greenfield, IA 50849
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Austin O'Brien

PUBLIC WORKS DIR.
Charles Campbell

September 22, 2004

Iowa Department of Natural Resources
Energy & Waste Management Bureau
Attn: Jeff Myrom
502 East Ninth Street
Des Moines, IA 50319

RE: DRAFT MILESTONES AND TIMELINE FOR MSW LANDFILL RULE REVISIONS

Dear Mr. Myrom:

I am writing to you regarding the captioned, which will significantly affect the Adair County Sanitary Landfill & Recycling Center. The Adair County Sanitary Landfill & Recycling Center's Commission is the governing body for the 28 E Agreement created by and under accordance to Iowa Code for this planning area which is listed in permit #1-SDP-1-74P. During the September 13, 2004 Commission meeting, the members requested we respond to your letter of September 3, 2004. The following are the concerns voiced by the Commission and the planning area of which we are a member:

- Our first concern is that this proposed IDNR policy was only recently mailed to the landfill facilities on September 9, 2004 with written comments only being accepted until October 1, 2004. What is the big hurry on this issue when public opinion is being requested? This hardly allows time for the various solid waste agencies to meet, let alone for us to respond as a city council or county board. Has the EPA all of a sudden required the State of Iowa to be in compliance on non-Subtitle D landfills, and if so what is EPA's deadline?
- Our second and most important concern is the environmental issues. If the IDNR is truly concerned with non-Subtitle D landfills contaminating the groundwater, why don't they enforce the current rules that require correction if contamination is occurring? Is there documentation that Iowa landfills are actually contaminating Iowa's drinking water? Each landfill is unique in its own way with different soils and groundwater conditions, why does IDNR want to label landfills all the same across the state when in fact they are not the same?

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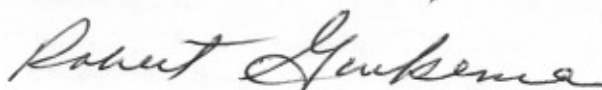
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- Our third concern relates to the above financial hardships for the publicly owned and operated landfills that believe owning their own waste facility was in their residents' best interests and who have followed State rules and regulations without harming the environment. Will there be Federal money provided to the State to help landfills achieve compliance within the next two years, or do the locally owned facilities have to foot the bill again? Some of the expenses that will have to be incurred locally are:
 - ✓ Additional engineering costs for redesigning the present site
 - ✓ Loss of approximately 30 years of airspace and revenue
 - ✓ Additional financing of a new site with subtitle D specifications
 - ✓ Additional or accelerated funding of closure/post closure accounts
 - ✓ The financial implications of having to switch to and construct a transfer station
 - ✓ The financial responsibilities of locating another facility to take the planning area's solid waste if a transfer station were constructed.

The two-year time limit does not allow the Commission even enough time to evaluate the options available for the planning area, whether to expand or construct a transfer station. This timeline is unreasonable for the Commission to take time to evaluate all the options, prepare financially, and to physically construct the chosen facility type. We are requesting a five-year time period or preferably even more as a more responsible and reasonable period to respond to these requirements.

If you should have any questions regarding any of our concerns, please feel free to contact me.

Sincerely,



Robert Guikema
Mayor