

IDA COUNTY  
**BOARD of SUPERVISORS**

401 Moorehead St., Ida Grove, Iowa 51445 Phone: 712-364-2632 Fax: 712-364-3929

**Joseph L Cronin**  
District One

**Robert C Paulsrud**  
District Two

**Jerry Ralston**  
District Three

September 17, 2004

Jeff Myrom  
IDNR Energy & Waste Management  
5<sup>th</sup> Floor Wallace Bldg  
502 E 9<sup>th</sup> St  
Des Moines, IA 50319

Re: IDNR letter dated 9/3/04 on MSW rule timeline

Dear Mr. Myrom,

The Ida County Board of Supervisors has a 28E agreement with the communities within Ida County to provide solid waste disposal. We meet with these communities on a monthly basis and include solid waste issues on every agenda.

We are very much concerned about and object to the timeline outlined in your letter. The Board of Supervisors unanimously approved this letter in response to your proposal.

Requiring all landfills to close if they are not operating in a subtitle D site by the summer of 2006 is an unrealistic expectation. We object to your proposed timeline for the following reasons:

Although Ida County is already evaluating its disposal options, we wish to continue finishing out the remaining life of the currently approved expansion as it was initially designed and authorized by IDNR.

At this time, Ida County has chosen to attempt to purchase adjacent land and to construct a new subtitle D expansion. However, negotiating with adjoining landowners is consuming more time than anticipated. Even if this land were available right now, the designing, permitting, and construction of a new cell will take at a minimum two years. Completion by summer of 2006 is unrealistic and virtually impossible.

We also wish to continue filling the current disposal area until we reach the authorized design. To leave this area as it currently exists would result in inadequate drainage problems. To expect the landfill to stop using this area and instead to complete the necessary grading with dirt is a waste of Iowa's soil and an unnecessary expense to the residents of Ida County.

Requiring us to close the site prematurely will require an acceleration of closure and post-closure accounts.

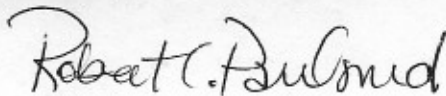
If there are landfills actually causing contamination of the ground water, then corrective action could be required for those sites. However, if an existing landfill is operating in compliance with the current rules and within its approved design, allowing it to be completed as permitted, would

seem to make sense. The Ida county Landfill is meeting the current ground water monitoring standards.

We received notice of this proposal just in time to place it on our Board agenda. If not for this early notice, it would have been difficult to schedule this on an agenda and your deadline date is too late for us to discuss at our monthly meeting with the communities. Why is the IDNR only accepting comments until October 1, 2004? Why such a hurry on this issue when public opinion is being requested? This hardly allows time for those involved to meet, let alone for us to take the issue to the city councils and county boards. 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 actual deadline? It is our understanding EPA was considering 2011 as a final date, not 2006.

We request you allow additional time for receiving comments. We also request the final date for compliance with the subtitle D liner requirements remain the year 2011, as previously determined, so that we and other planning areas do not suffer the catastrophic results an earlier deadline would inflict.

Sincerely

A handwritten signature in cursive script that reads "Robert C. Bulmond". The signature is written in dark ink on a light-colored background.

Chairman  
Ida County Board of Supervisors

CC: Jeffrey Vonk, Iowa DNR Director  
Senator James Seymour  
Representative Clarence Hoffman