

**ISOSWO**

**IOWA SOCIETY OF  
SOLID WASTE OPERATIONS**

**Position Statement**

**MSW Landfill Expansion and Liner Guidance Document  
September 5, 2003**

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The Iowa Society of Solid Waste Operations (ISOSWO) appreciates the opportunity to comment on the Iowa Department of Natural Resources (IDNR) MSW Landfill Expansion and Liner Guidance Document. As ISOSWO members strive to improve the environment everyday, and the organization's mission statement has as one of its main tenets the promotion of policies and regulations that are both environmentally sound and cost-effective, ISOSWO supports the IDNR as it moves towards full compliance with the U.S. Environmental Protection Agency's (EPA) Subtitle "D" regulations. We believe the development of a guidance document is an important step in this direction and that the IDNR's efforts will provide the necessary environmental protection that the solid waste industry is striving toward. As the organization in Iowa whose members are directly involved in solid waste management issues – either as public or private sector employees, consultants, engineers, planners, regulators, or local elected officials – ISOSWO also appreciates the IDNR's inclusion of the organization in the process of finalizing this document.

The guidance document approach, offers the regulated community the opportunity for input and communication with regulators, and is a worthy avenue of complying with EPA regulations. ISOSWO also encourages the IDNR to pursue rulemaking on this issue in order to finalize this process.

We would like to thank IDNR staff for their efforts in working with the ISOSWO Technical Committee as the guidance document is reviewed.

Approved September 5, 2003  
By Mary Wittry, President