



EAST CENTRAL IOWA
COUNCIL OF GOVERNMENTS
YOUR REGIONAL PLANNING AGENCY

October 14, 2004

Iowa Dept. of Natural Resources
Attn: Jeff Myrom
502 East 9th Street
Des Moines IA 50319

Dear Mr. Myrom:

I am submitting comments to the draft milestones and timeline for the MSW landfill rule revisions on behalf of the Jones County Solid Waste Management Commission (Commission). Commission contact information:

Jones County Solid Waste Management Commission
C/O Diane Casper
PO Box 235
Anamosa, Iowa 52205
319-462-4977

The Commission is primarily concerned with the proposed timeline requiring compliance or closure in summer 2006. The Jones County Landfill has a long-range plan to open a Subtitle D equivalent lined cell by 2010. The planning and financial instruments are in place to achieve this goal. The proposed 2006 deadline will result in a significant hardship both financially and technically.

The Commission fully intends to comply with the Subtitle D requirements and has operated a landfill according to DNR rules for several decades. As you know, landfill expansions require careful planning for the design and technical elements as well as the funding mechanisms. The Commission has taken steps toward expansion with their engineer of record, Rick Yoerger. For example, landfill staff is in the process of removing dirt for new cell construction.

Constructing a new landfill cell by summer 2006 will likely be more costly than planned and more difficult to accomplish with limited engineering and construction services available in the state. The Commission proposes two possible solutions:

1. Extend the deadline for compliance until summer 2008, at least.
2. Allow the Commission to submit a detailed landfill expansion plan in 2006 that outlines the progress made toward cell construction and a timeline for completion.

Please consider these comments to your proposed timeline. The Commission is interested in working together to achieve the desired outcome. Contact the Commission or me, 319-365-9941 or jennifer.ryan@ecicog.org with questions.

Sincerely,

A handwritten signature in black ink that reads "Jennifer Ryan". The signature is fluid and cursive, with the first name being more prominent.

Jennifer Ryan, ECICOG Solid Waste Planner
On behalf of the Jones County Solid Waste Management Commission

