

From: "Joe Robertson" <jrobertson@co.marshall.ia.us>
To: "Jeff Myrom" <Jeff.Myrom@dnr.state.ia.us>
Date: 10/15/04 4:16PM
Subject: Draft Milestones and Timeline for MSW landfill rule revisions

Iowa Department of Natural Resources
Attn: Jeff Myrom
502 East 9th Street
Des Moines, Iowa 50319

October 15, 2004

Dear Mr. Myrom:

I am submitting these comments on behalf of the Solid Waste Management Commission of Marshall County and as an individual.

I am commenting on the issue of complying with revised IAC-113 or closing by the Summer of 2006.

I believe it will be necessary to evaluate each facility on a case by case basis to determine a feasible date to accomplish a closure. In some cases the Summer of 2006 may be too early to accomplish the best possible closure for a given facility. Each facility should be evaluated to determine what might be the best possible goal date for closure to ensure the best outcome for the aesthetics and environmental impact of that facility over time. For example a facility may already contain 600,000 tons of waste material on a given footprint and it may need to add an additional 100,000 tons in order to get a reasonable finished surface in order to maintain optimum drainage over the closure period of that facility. The addition of the waste would be an environmental enhancement for the facility and improve it's long term impact.

Along these same lines it will be very important during the rule making process to ensure that we don't categorically rule out horizontal expansions of non compliant fills to the detriment of the long term performance of the entire fill site. The addition of a Subtitle D Compliant fill directly adjacent to a non compliant fill can enhance the long term performance of an existing fill and utilize air space that would otherwise be lost without adding any additional risk for contaminate release from the original footprint. With sound engineering a Subtitle D expansion adjacent to existing fill can improve the performance of the site over time by capturing potential leachate from the existing fill as well as capturing the otherwise unused air space and providing for a better performing final contour over time.

Thank you for this opportunity to comment.

Sincerely yours,
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