

**SOLID WASTE MANAGEMENT COMMISSION  
OF MARSHALL COUNTY**

P.O. BOX 217, MARSHALLTOWN, IA. 50158 PHONE: 641-752-0646 FAX: 641-752-4562

March 24, 2005

Iowa Department of Natural Resources  
Energy & Waste Management Bureau  
Attn: Jeff Myrom  
502 East Ninth Street  
Des Moines, IA50319

Re: Request for technical information and comments regarding alternative liner design

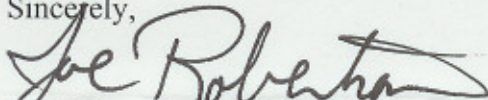
Dear Mr. Myrom:

Thanks for the opportunity to comment in regards to your recent request for information.

I feel alternate liners and default liners (FML and Clay Composite) should all be evaluated with modeling on a site by site basis to determine their ability to meet design performance standards that have been established by Federal Rule. Neither should receive preferential treatment.

The length of time that a facility is "open" and receiving waste seems inconsequential when compared to the length of time being modeled for environmental compliance. The Federal Standard for modeling a completed closed facility seems more appropriate when considering the timelines involved. To carry any other limit of "open time" to an extreme would require a composite lined facility to install FML as dailey or at least intermediate cover when in reality the fill material is going to "starve" for water before stabilizing through decomposition anyway.

Sincerely,



Joe Robertson  
Manager