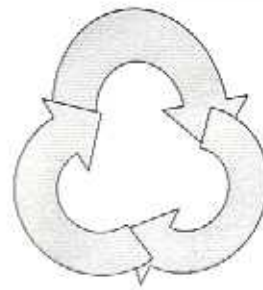


PAGE COUNTY LANDFILL ASSOCIATION  
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**REDUCE, REUSE, & RECYCLE**

August 22, 2003

Response to IDNR draft of MSW Landfill Expansion and Liner Guidance.

The Page County Landfill was approved by the IDNR to begin a vertical expansion phase ten years ago to gain additional space and to lessen the danger of groundwater contamination by increasing the slopes to enhance rainwater runoff and stop the pooling of water in settled areas where the rainwater was percolating down through the top cover. During this ten-year time period we have not had any significant groundwater contamination.

In 1996 we installed a retrofit leachate collection system to help alleviate the risk of groundwater contamination to comply with DNR regulation. Since the installation of the leachate control system we have significantly reduced the amount of our low strength leachate. Leachate characterization reports have been submitted each fall with our annual water quality report.

We have just spent over \$32,500.00 on a design plan, which has been submitted to the IDNR to further insure groundwater quality. This design included a liner in between two unlined areas. The unlined areas both slope to the lined area, which has a drainage layer and leachate collection, line. This 4-acre Subtitle D area will collect any leachate that could possibly get by the retrofit leachate collection system. The design will further decrease the risk of groundwater contamination. This project with an estimated cost exceeding \$500,000 would enable our landfill to fulfill the needs of Page County beyond the ten-year limit as outlined in your proposal. Based on our experience over the last ten years, we are quite certain we can continue this proposed vertical expansion without causing environmental problems or contamination.

Our landfill receives a high percentage of residential waste resulting in low strength leachate. We've had several TCD events and are in the process of adding a Household Hazardous Waste Satellite facility on site to eliminate Household Hazardous Waste from entering the landfill. A successful recycling program has been in operation for 20 years. It has always been the goal of our landfill staff and board to provide an environmentally safe place for disposal of solid waste for Page County residents and industry.

If this proposal has been in the planning stage for over a year, why wasn't the Solid Waste Industry informed of the proposed policy change? It would appear that this policy

change would further IDNR's long range plans to close small landfills and transport waste to regional landfills without justifiable cause.

Is there any documentation showing that existing vertical expansions with proper installed leachate systems are causing increased groundwater contamination?

Based on the difficulty to meet the standards of a new site, it would seem more rational to allow vertical expansion of an existing approved site. It allows landfills to be more cost effective by not having two sites to provide financial assurance.

It is our opinion that an option of lower elevations and gentler slopes could be implemented instead of the proposed ten-year time frame.

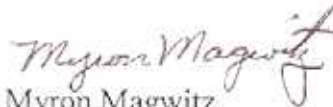
We as part of the solid waste industry are very concerned over the time period to get plans approved and to our knowledge since "Doc" Halladay's retirement we haven't had a P.E. to approve any plans.

We were given an opinion that our proposal was applicable and have spent \$32,500.00 for preliminary design plans and purchased additional ground to control surface runoff for \$282,000, plus over \$100,000 over the last ten years. To enact a policy change of this magnitude and not informing the industry will create an economic hardship for many landfills with plans for expansion and increase fees for its citizens. We feel that this policy change should be tabled and further researched for its impact on the industry.

Sincerely,



Robert Anderson  
PCLA Board President



Myron Magwitz  
PCLA Manager

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