

# Prairie Solid Waste Agency

1774 Lark Avenue (PO Box 227) Creston, IA 50801 Phone/Fax: 641-347-5022 email: [recycle@iowatelecom.net](mailto:recycle@iowatelecom.net)  
Leslie Bullock Goldsmith, Director

October 11, 2004

**To:** Jeff Myrom

Iowa Department of Natural Resources

502 East 9<sup>th</sup> Street

Des Moines, IA 50319

**From:** Leslie Goldsmith, director Prairie SWA operating the Union County Landfill #88-SDP-1-79P

**CC:** Prairie Solid Waste Agency Board members, Jeff Millhollin, Secretary of Adams-Taylor Regional Service Agency and Christine Collier, Barker Lemar Engineering

**RE:** Draft milestones and timeline for MSW landfill rule revisions

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## Agency Background

Prairie Solid Waste Agency (SWA) operates the Union County Landfill, receiving 16,000 tons of waste per year. Prairie SWA is a 28E organization made up of representatives from each city in Union County plus a representative for rural population, and a representative from the Madison County town of Macksburg.

Prairie SWA also serves Adams and Taylor Counties by providing landfilling and other solid waste services such as recycling, waste reduction education and household hazardous waste disposal as specified in a contract between Prairie SWA and Adams/Taylor Regional Service Agency. Prairie SWA serves a total population of 24,000 people. These two solid waste agencies in the planning area have resisted combining forces under one 28E, but progress has been made the past couple years and the boards now jointly set the tipping fee.

In 2003, the Union County Landfill was retro-fitted with a toe drain and leachate lagoon in order to improve environmental performance on the site. At that time 5.2 acres were permanently closed and seeded. The most recent airspace study shows four to five years of space left in the current fill. This was a \$300,000 project. Prairie SWA is dedicated to environmentally sound, cost-effective solid waste disposal.

## Thoughts and Comments

As director of an unlined landfill, I do not believe the suggested RCRA Subtitle D liner compliance timeline allows enough time for all of the steps planning areas need to go through to become compliant. Plus the compact timeframe leaves our agency short of needed funds to close the present cell and open a new lined cell while running all the services we have taken on.

I feel that before a timeline is set, important information should be supplied by IDNR:

- Will our agency be allowed to piggyback new waste over our old cell and how we may do so?
- Will Construction and Demolition Waste landfills also need to be Subtitle D lined?
- Will alternative liners be allowed?
- How will Financial Assurance be handled if the new timeline is adopted? We currently use a dedicated fund – will we need to put 3 year's FA into funds in 2 years?
- Will IDNR have enough staff process permits of all the new landfills?

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I also have some operational concerns and questions:

- Once all the new Subtitle D compliant landfills are permitted will there be enough qualified contractors in and around Iowa to do this work?
- Will there be enough liner material and installation crews for so many landfills all at once? Tire chips and sand are other materials that may fluctuate due to demand. Will it become a seller's market for these materials so that buyers are forced to pay more for the material because artificial high demand due to the timeline?
- How might weather affect the timeline?
- Our agency has limited operating funds, and will not be able to design, permit and build without some outside financial help. Is a bond the best way to go? How long does it take to pass a bond? Will our agency be able to get a bond on our own, or will we have to go through our members? How much will tipping fees be in the future? These are financial and political issues.
- Will Adams/Taylor Regional Service Agency stick with Prairie SWA or will they decide to go elsewhere? Adams/Taylor will need to gather information in order to make an informed decision. This too will slow down our planning process.

Even though our agency has limited airspace and had already begun to plan for a new lined cell, we will not be able to meet this strict timeline. Our problems with meeting the timeline are financial (funding closure and new cell development), political (consolidating agencies and/or planning areas) and cell design/building/closure (engineers, contractors, weather, DNR).

It is time for Iowa's landfills to meet the EPA standards, but rushing through the transition will not mean better landfills. A less than two-year timeline is not adequate to implement the intent of RCRA Subtitle D in Iowa. I support a longer period of time (at least 3 years – maybe 4 depending on weather) in which Iowa's landfills can revise plans, arrange financing, rearrange planning areas and implement Subtitle D while closing unlined cells.

Change is hard. I encourage DNR to look into how other states eased this transition. Let's learn from others and do this the right way.

Thank you for this opportunity to comment on the Timeline Memo.

Sincerely,



Leslie Bullock Goldsmith, director