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Iowa Department of Natural Resources
Energy & Waste Management Bureau
Attn: Jeff Myrom
502 East 9th St.
Des Moines, IA 50319

RE: MSW Landfill Expansion and Liner Guidance

Dear Jeff:

I have reviewed the proposed guidance issues concerning landfills and liners. As I understand it the Department is proposing to allow existing landfills a ten year period to implement the liner requirement. It is not clear why ten years was picked. That seems like a long-time particularly if the landfill has leachate problems. In situations where there are high levels of leachate in the landfill, adding ten more years of garbage will probably aggravate the problem and make it much more difficult to manage. On the other hand if the landfill does not have any environmental issues it may be acceptable to extend the grace period for an extensive amount of time. I'm guessing that if you look critically at these old landfills without liners many of them will have leachate management problems.

Feel free to call if you would like to discuss this issue.

Sincerely,

Morris L. Preston, PE, QEP
President

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