



August 25, 2003

Jeff Myrom, Executive Officer
Energy & Waste Management Bureau
Iowa Department of Natural Resources
502 East Ninth Street
Des Moines, IA 50319

WASTE MANAGEMENT

North Central Region
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Burnsville, MN 55306
(612) 435-2539 Fax

Dear Mr. Myrom:

Waste Management thanks you for the opportunity to provide comment on the draft landfill expansion and liner guidance document. In general, our future plans for WM facilities in Iowa will be in compliance with the requirements of the current draft of the guidance.

One question we have regarding the guidance document is in regard to the start date and timeframe for implementation. While the guidance document discusses a 10 year timeframe for implementation. No start date is given. In the discussion section of the guidance document there is reference to IAC 567-Chapter 113.26(1)"d", the requirements of which were "effective November 13, 1996, and apply to liner and cover systems that had not been installed by that date." If the 10 year timeframe for facilities to come into compliance for liner and cover systems were to begin on November 13, 1996, this would synchronize with what we understand is the IDNR's compliance schedule for all Iowa landfills to meet Subtitle D requirements for Financial Assurance.

Again, we thank you for the opportunity to comment on the guidance document and to keep us informed of the IDNR's rule schedule and program changes. We greatly appreciate the effort the Iowa DNR has made to provide timely and valuable information through the Iowa Client Contact Meetings. If you have any questions you may reach me at (651)-334-4309.

Sincerely,

Julie Ketchum, Government Affairs
Waste Management

Cc:

Steve Batchelor, MidWest Group, Area Vice President, Waste Management
Charles Bayley, Director of Government Affairs, Waste Management
Bill Jeffry, Senior Legal Counsel, Waste Management
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