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March 5, 2007

Mr. Brian Tormey
Iowa Department of Natural Resources
Wallace State Office Building
502 E. 9th St.
Des Moines, Iowa 50319

Re: Proposed Rule Iowa Administrative Chapter 113

Dear Mr. Tormey:

As the comment period on proposed Iowa Administrative Code Chapter 113 continues, the Iowa Society of Solid Waste Operations (ISOSWO) wishes to reiterate its position regarding the deadline for compliance with landfill liner standards.

The ISOSWO Board of Directors supports the October 1, 2007, deadline set by the Environmental Protection Agency to stop filling over unlined cells and or cells without a leachate collection system that meet current federal rules.

This reinforces ISOSWO's earlier comments supporting the Iowa Department of Natural Resources (DNR) commitment to move to improve the environment and to work with the affected stakeholders as noted in:

- Attachment A for ISOSWO's position statement dated September 5, 2003.
- Attachment B containing DNR's request to United States Environmental Protection Agency (USEPA), dated January 3, 2005, for a compliance date of October 1, 2007.
- Attachment C containing ISOSWO's support of DNR's request to USEPA to set the date for ending filling on unlined cells and or cells without a leachate collection system by October 1, 2007.

Thank you for your consideration in this matter.

Sincerely,

Mary Wittry, President
Iowa Society of Solid Waste Operations
19111 Kittyhawk Ave.
Carroll, Iowa 51401

Cc: ISOSWO Board of Directors
Rich Leopold, Director of DNR
Members of the Environmental Protection Commission
Members of the Administrative Rules Committee

Improving the Environment Everyday

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