

February 21, 2007

Mr. Alex Moon
Environmental Program Supervisor
IDNR-Energy and Waste Management
Wallace State Office Building
502 East 9th Street
Des Moines, Iowa 50319

RE: Comments on Proposed Chapter 113

Dear Mr. Moon:

This letter is in response to the proposed Chapter 113 rule changes. Overall, the rules as proposed will represent a significant increase in operating expenditures to the Newton Sanitary Landfill. Based on current estimates provided by Fox Engineering, these costs represent a **20%** increase over current operating expenditures. What follows is a summary of these expenses.

Existing Sampling Points (monitoring wells and surface water points)

Current sampling cost \$6,700/year
Estimated sampling costs in the first year **\$163,800**
Estimated sampling costs in subsequent years **\$65,520**

New Monitoring Points

Installation of new wells (assume \$3,000 per well) **\$75,000**
Estimated sampling costs in the first year **\$195,000**
Estimated sampling costs in subsequent years **\$78,000**

Sampling Costs

Current sampling costs \$2,000 per sampling event for a total of \$4,000/year
Estimated sampling costs \$5,000 per sampling event for a total of **\$10,000/year**

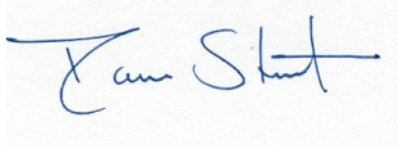
Annual Report Costs

Current annual report cost \$2,600/year
Estimated annual report costs **\$4,000/year**

In addition to increased operating expenditures, there will also be significant impact to Closure/Postclosure expenditures. If the proposed rules are enacted for just the existing 21 monitoring point and EPA Appendix II is required, the postclosure costs increase by **\$66,220** per year or a total of **\$1,986,600** over the 30 year postclosure period. Adding Appendix II analysis of the new wells adds another **\$78,000** per year or a total of **\$2,340,000** over the 30 year postclosure period.

I too am concerned about protecting our environment. We work diligently to comply with all applicable environmental laws and standards at the Newton Sanitary Landfill to protect our natural resources for generations to come. However, on behalf of all 28E membership of the Newton Sanitary Landfill, I ask that serious consideration be given to the cost/benefit ratio of these proposed rules. Thank you in advance for your consideration.

Sincerely,

A handwritten signature in blue ink that reads "David Stewart". The signature is written in a cursive style with a large initial "D" and "S".

David Stewart, P.E.
Public Works Director/City Engineer

CC: City of Newton Mayor and City Council
David Watson, City Administrator
28E Membership
Fox Engineering
Rodney VanDusseldorp, Landfill Superintendent