

SOUTH DALLAS COUNTY LANDFILL AGENCY
2000 Main St., P.O. Box 263
Adel, Iowa 50003
515-993-3148

March 5, 2007

Alex Moon
Iowa Department of Natural Resources

RE: Chapter 113 Rulemaking

Dear Mr. Moon:

Having read the proposed new rules and the departments comments regarding variances and financial impact of the proposed new rules I have the following comments:

- The department chose a 0.65 acre disposal cell for its calculations of financial impacts to landfills. South Dallas' most recent cell was over 2 acres in size. Therefore the estimates given by the department should be increased 3 to 4 times to be fair. For example, the increase in cost for separation from groundwater should be \$60,000 not \$17,000.
- A point of compliance for those with alternative liners should be site specific and determined by engineers based on conditions at those sites. If the department wishes to require additional liner thickness, they should justify that requirement and not change the point of compliance as a back door to the real goal. There is no justification for a POC to be within 50 feet of the waste boundary.
- The logical place to measure leachate head is at its lowest elevation. An additional measurement off that lowest point is of no value.
- What is the point of monthly surface water measurements?
- There is no way to control development around our existing permitted landfill. Residential development has occurred within 500 feet of our boundary after our site was permitted.
- There does not seem to be a basis for increasing the number of monitoring wells.

South Dallas County Landfill has made every effort to comply with the DNR rules and regulations as they currently exist and have planned future development based on those rules. We are in compliance with EPA rules and regulations. Changing our status to an "open dump" because of rule changes is unfair. Compliance status should be determined at the next development phase.

Sincerely,

Vickie Moorhead
Director