



ARKANSAS

ENERGY & ENVIRONMENT

6/29/2021

Mr. Nathan Charles
Solid Waste Service Manager
10803 Ironton Cutoff Road
City of Little Rock Disposal Facility
Little Rock, AR 72206

RE: Quarterly Inspection conducted on June 14, 2021
AFIN 60-01071
Permit Number 0266-S1

Dear Mr. Nathan Charles,

The Arkansas Division of Environmental Quality Office of Land Resources (DEQ) conducted a routine inspection of your facility pursuant to the Arkansas Solid Waste Management Act (Arkansas Code, Annotated, § 8-6-201 *et seq.*), of 1971, as amended, the Arkansas Pollution Control & Ecology Commission Regulation 22 (Solid Waste Management), and the above-referenced permit. The inspection identified conditions at your facility which the DEQ alleges constitutes violations. A copy of the inspection report is attached.

You should immediately initiate actions to correct the alleged violations cited. A written response of the corrective actions taken, or to be taken, must be submitted within thirty (30) calendar days from the date on this letter to the attention of Kim Davenport. The response may include, but is not limited to, photographs, copies of disposal receipts, records, or analytical results, as applicable. If you have any questions regarding the alleged violations, please do not hesitate to contact me at (501) 682-0586 or davenportk@adeq.state.ar.us.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Kim Davenport'.

Kim Davenport
Solid Waste Inspector
5301 Northshore Drive, North Little Rock, AR 72118-5317

Enclosure

cc: Scott McWilliams, Compliance Manager, Office of Land Resources



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Division of Environmental Quality
Office of Land Resources - Solid Waste Management
Class 1 Landfill Inspection

Site Name	City of Little Rock Class 1 Landfill	County	Pulaski	AFIN	60-01071
Facility Address	10803 Ironton Cutoff, Little Rock, AR 72206	Phone Number	501-888-4493	Permit Number	0266-S1
Permittee Address	10803 Ironton Cutoff, Little Rock, AR 72206	E-Mail Address	ncharles@littlerock.gov		PDS# 116528
Date	6/14/2021	Entry Time	1000	Exit Time	1145

Regulation 22 – Operational Standards

Category 1

Regulation	Item Description	Comments
411(l)	Adequate employee facilities	
421(a)(b)	Record keeping meets requirements specified by regulations	
417	Access requirements	
411(j)	Adequate provisions for backup equipment	
421(d)	Waste receipt records, ticket system maintained	
411(k)	Telephone system & written emergency response plan on site	
423(b)	Annual compliance inspection by registered professional engineer	
422	Facility implements operating plan and narrative	
421(f)	Leachate disposal/recirculation records	
421(g),701	Special waste disposal and procedures records	

Category 2

Regulation	Item Description	Comments
411(a)	Operations in accordance with permit documents	
417(c)	Adequate all weather operational roads	
411(c)	Smallest practical area, unloading supervised, single working face	
411(e)	Salvage operations meet approved conditions	
411(f)(1)	Scavenging of waste prohibited	
411(p)	Proper wet weather repairs	
411(b)	Operations by licensed on-site personnel at all times	
411(d)	Waste spread and compacted as unloaded	
411(g)	Litter control provisions maintained	
414(a)	Disease vectors controlled	

Category 2 (continued)


	Regulation	Item Description	Comments
	427	Surface Water Controls	
	411(h)(1)	Contouring prevents surface water flowing into or through waste	
X	418(a)(b)	Run-on/off control system present and adequate	A run-on control system was not observed in place to prevent flow onto the active portion of the landfill during the peak discharge from a 24-hour, 25-year (return frequency) storm. (Refer to Photos #1 - #3 & #5.)
	411(h)(2)	Surface water control prevents off-site sediment accumulation	
	411(i);427(f)	Adequate maintenance of intermediate/final cover vegetation	
	415	Gas monitoring program	
X	411(o)	Leachate leaks or evidence of leachate seepage	Leachate observed pooling in Cell 5 west and on the exterior slope of Cell 4 east. (Refer to Photos # 4 - #8.)
	426	Survey controls	
	429	Leachate collection system	
	420	Liquid Restrictions	

Category 3

	Regulation	Item Description	Comments
	412	Implementation of hazardous/unauthorized waste exclusion plan	
	413(a)(b)	Satisfactory daily/alternative cover	
X	413(c)	Satisfactory intermediate cover	Erosion with exposed waste observed in the interim cover on the south slopes of Cells 4 & 5. (Refer to Photos #9 & #10.)
	416(b),411(f)(4)	Open burning prohibited	
	419	Cause discharge/leachate discharge leaving landfill	
	411(f)(3),419(a)(4)	Depositing waste in standing water prohibited	
X	411(o)	Erosion or other cover defects resulting in exposed refuse	Cover defects resulting in exposed waste were observed in the north portion of Cell 5 west. (Refer to Photos #3 - #5.)
	309(c)	Overfill/Off lined area	

Regulation 22 - Records

421(a)(8), 1203(k)	Date of last groundwater monitoring report	6/2/2021	Site Conditions	Wet
423(b)	Date of last engineering report	4/2/2021	Weather Conditions	Sunny
428	Liner construction in progress	Yes/No No	Notice of liner construction	Yes/No No
			Third party CQA on-site during construction	Yes/No N/A
412(a)	Date of last random inspection for unauthorized waste	5/27/2021	Total # for month	4
415, 421(e)	Date of last quarterly methane monitoring	6/11/2021	Detection level	0
			415(a) Explosive gas records current?	Yes/No
421(g),412(a)(2),701	Date of last special waste received	7/1/2020	Disposal location	Class 1 – Cell V – E10CV
421(d)	Previous quarter waste received	27,318.51	Tons	
427(c)	Surface water DMR records current?	Yes/No		

Fayetteville Shale Related	Yes/No	Out of Compliance with Fayetteville Shale	Yes/No
Operator Name & Number	Raymond Bell - 000561		Signature of Inspector
			
Exit Interview Conducted with	Nathan Charles	Method	On-site
		Date	6/14/2021
		Time	1120

Division of Environmental Quality Official Photograph Sheet

Location	City of Little Rock Class 1 Landfill			Permit	0266-S1	AFIN	60-01071
Photographer	Kim Davenport, Inspector		<i>KD</i>	Witness	N/A		
Photo #	1	Of	10	Date	6/14/2021	Time	1046
Description	A view of the active working face is observed in the background. Run-on controls are not observed to prevent stormwater from coming into contact with waste under daily cover, looking northeast at Cell 5 west.						



Location	City of Little Rock Class 1 Landfill			Permit	0266-S1	AFIN	60-01071
Photographer	Kim Davenport, Inspector		<i>KD</i>	Witness	N/A		
Photo #	2	Of	10	Date	6/14/2021	Time	1045
Description	A northern view of Cell 5 west to show run-on controls are not in place to prevent stormwater from contacting waste. The foreground shows shredded wood containing plastic waste used as an alternate daily cover.						



Division of Environmental Quality Official Photograph Sheet

Location	City of Little Rock Class 1 Landfill			Permit	0266-S1	AFIN	60-01071
Photographer	Kim Davenport, Inspector		<i>KD</i>	Witness	N/A		
Photo #	3	Of	10	Date	6/14/2021	Time	1050
Description	The liner of Cell 5 west is exposed in an area where surface water has eroded the initial sand layer, exposing waste. No run-on controls observed. This area observed on the right side of Photos #1 & #2.						
							
Location	City of Little Rock Class 1 Landfill			Permit	0266-S1	AFIN	60-01071
Photographer	Kim Davenport, Inspector		<i>KD</i>	Witness	N/A		
Photo #	4	Of	10	Date	6/14/2021	Time	1021
Description	Active working face shown in the background. Ponding leachate observed in the northeast corner of Cell 5 west.						
							

Division of Environmental Quality Official Photograph Sheet



Location	City of Little Rock Class 1 Landfill			Permit	0266-S1	AFIN	60-01071
Photographer	Kim Davenport, Inspector		<i>KD</i>	Witness	N/A		
Photo #	5	Of	10	Date	6/14/2021	Time	1021
Description	An overview of the center of Cell 5 west shows ponded leachate in the northern portion of the cell. No run-on controls observed to decrease flow of storm water into the waste mass.						



Location	City of Little Rock Class 1 Landfill			Permit	0266-S1	AFIN	60-01071
Photographer	Kim Davenport, Inspector		<i>KD</i>	Witness	N/A		
Photo #	6	Of	10	Date	6/14/2021	Time	1021
Description	A view of ponded leachate in the northwest portion of Cell 5 west.						



Division of Environmental Quality Official Photograph Sheet

Location	City of Little Rock Class 1 Landfill			Permit	0266-S1	AFIN	60-01071
Photographer	Kim Davenport, Inspector		<i>KD</i>	Witness	N/A		
Photo #	7	Of	10	Date	6/14/2021	Time	1038
Description	Leachate observed on the exterior slope of Cell 4 east.						
							
Location	City of Little Rock Class 1 Landfill			Permit	0266-S1	AFIN	60-01071
Photographer	Kim Davenport, Inspector		<i>KD</i>	Witness	N/A		
Photo #	8	Of	10	Date	6/14/2021	Time	1038
Description	Leachate observed on the exterior slope of cell 4 east.						
							

Division of Environmental Quality Official Photograph Sheet

Location	City of Little Rock Class 1 Landfill			Permit	0266-S1	AFIN	60-01071
Photographer	Kim Davenport, Inspector		<i>KD</i>	Witness	N/A		
Photo #	9	Of	10	Date	6/14/2021	Time	1042
Description	Erosion with exposed waste observed on the south slope of Cells 4 & 5, under interim cover.						



Location	City of Little Rock Class 1 Landfill			Permit	0266-S1	AFIN	60-01071
Photographer	Kim Davenport, Inspector		<i>KD</i>	Witness	N/A		
Photo #	10	Of	10	Date	6/14/2021	Time	1042
Description	A closer view of the erosion and exposed waste shown in Photo #9.						

