



ARKANSAS

ENERGY & ENVIRONMENT

8/18/2022

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

RE: Inspection conducted on August 4, 2022
AFIN 60-01071
Permit Number 0266-S1

Dear Mr. 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', is placed over a rectangular box.

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

Enclosure

cc: Scott McWilliams, Senior Compliance Manager, Regulated Waste Operations



ARKANSAS
ENERGY & ENVIRONMENT

**Office of Land Resources
Regulated Waste Operations
Class 1 Landfill Inspection Form**

Site Name	City of Little Rock Class 1 Landfill	County	Pulaski	AFIN	60-01071
Facility Address	10803 Ironton Cutoff, Little Rock, AR 72206	Phone #	501-888-74493	Permit #	0266-S1
Permittee Address	10803 Ironton Cutoff, Little Rock, AR 72206	Email Address	ncharles@littlerock.gov	PDS #	121428
Date	8/4/2022	Entry Time	0930	Exit Time	1300

Operational Standards

Category 1

	Regulation	Item Description	Comments
	417	Access Requirements	
	411(j)	Adequate Provision for Backup Equipment	
	423(b)	Annual Compliance Inspection by Registered Engineer	

Category 2

	Regulation	Item Description	Comments
X	411(a)	Operations in Accordance with Permit Documents	Operations at the landfill do not reflect Operating Plan on file. Operating plan requires update. One example: Operating Plan Doc #60665, Section 4.0 describes BMP's used to prevent run-on into active portions of the landfill, however, no BMP's were observed in place to manage surface flow into the active area. Instead, a trench was observed, approximately 10' deep by 300' long, to convey leachate from the active area to the open sand layer located on the southern end of Cell 5. This practice is not described in the operating plan, nor is it approved. (Refer to Photos #1 - #10.)
	411(c)	Smallest Practical Area, Unloading Supervised, Single Working Face	
	411(b)	Operations by Licensed On-site Personnel at All Times	
X	411(g)	Litter Control Provisions Maintained	Litter observed across the active area with no litter controls in place. (Refer to Photos #3 - #6 & #15.)
	427	Surface Water Controls	
X	411(h)(1)	Contouring Prevents Surface Water Flowing Into or Through Waste	The active area is not contoured to minimize the flow of surface water to flow through waste. (Refer to Photos #11 - #14.)
X	418(a)(b)	Run-on/off Control System Present and Adequate	A storm-water control system is not in place along the interior slopes (Cells 1, 2, 5E & Cell 9W) to prevent run-on onto the active portion of the landfill at Cell 5. (Refer to photos #1 - #10.)
	411(h)(2)	Surface Water Control Prevents Off-site Sediment Accumulation	
	411(i)	Adequate Maintenance of Intermediate/Final Cover Vegetation	
	415	Gas Monitoring Program	
	411(o)	Leachate Leaks or Evidence of Leachate Seepage	
X	429	Leachate Collection System	The leachate collection system does not adequately dewater the waste mass, as evidenced by the operator's statement a trench was needed to remove the waist-high leachate pool that had collected in the working face. (Refer to Photos #4 & #6 - #14.)


Category 3

	Regulation	Item Description	Comments
	413(a)(b)(c)	Satisfactory Daily/Alternate/Intermediate Cover	

	419(a)(5)	Cause Discharge/Leachate Leaving Landfill	
X	411(f)(3)419(a)(4)	Depositing Waste in Standing Water Prohibited	Waste observed in leachate in the interior and at the eastern edge of the active area of Cell #5. (Refer to Photos #4, #6 - #12.)
X	411(o)	Erosion or Other Cover Defects Resulting in Exposed Refuse	Cover defects resulting in exposed waste observed on the west slope of Cell #4, interim cover of Cell #9 over Cell #2, at the toe of Cell #2 (drainage ditch), active Cell 5, and along the eastern edge of Cell 5 (at the sand layer). Waste removed from the trench was observed exposed along the eastern side of Cell 5. (Refer to Photos #1 - #3, #7- #14, & #16 - #18.)
	309(c)	Overfill/Off Lined Area	

Records

Date of Last Annual Report	4/18/2022	Date of Last Quarterly Methane Monitoring	6/17/2022
Date of Last Groundwater Monitoring Report	6/10/2022	Previous Quarter Waste Received	72,677.99 Tons

Operator Name & Number	Nathan Charles - 004315	Signature of Inspector	
Exit Interview Conducted with	Nathan Charles & Todd Lewis	Method	Via phone
		Date	8/5/2022
		Time	0821

Division of Environmental Quality Official Photograph Sheet



Location	City of Little Rock Class 1			Permit	0266-S1	AFIN	60-01071
Photographer	Kim Davenport, Inspector	<i>KD</i>		Witness	Ryan Hayden, Inspector Supervisor		
Photo #	1	Of	18	Date	8/4/2022	Time	1046
Description	A view of the west slope of Cell 5 East showing exposed waste and no BMP's in place on the slope.						



Location	City of Little Rock Class 1			Permit	0266-S1	AFIN	60-01071
Photographer	Kim Davenport, Inspector	<i>KD</i>		Witness	Ryan Hayden, Inspector Supervisor		
Photo #	2	Of	18	Date	8/4/2022	Time	1049
Description	Exposed waste observed along the west slope of Cell 5 East. A collapsed silt fence observed on the slope identified by red arrow.						



Division of Environmental Quality Official Photograph Sheet

Location	City of Little Rock Class 1			Permit	0266-S1	AFIN	60-01071
Photographer	Kim Davenport, Inspector	<i>KD</i>		Witness	Ryan Hayden, Inspector Supervisor		
Photo #	3	Of	18	Date	8/4/2022	Time	1038
Description	Litter observed on the southern end of Cell 5 with no controls in place.						
							
Location	City of Little Rock Class 1			Permit	0266-S1	AFIN	60-01071
Photographer	Kim Davenport, Inspector	<i>KD</i>		Witness	Ryan Hayden, Inspector Supervisor		
Photo #	4	Of	18	Date	8/4/2022	Time	1041
Description	Litter observed on the southern end of Cell 5 with no controls in place. Leachate observed pooling.						
							

Division of Environmental Quality Official Photograph Sheet

Location	City of Little Rock Class 1			Permit	0266-S1	AFIN	60-01071
Photographer	Kim Davenport, Inspector	<i>KD</i>		Witness	Ryan Hayden, Inspector Supervisor		
Photo #	5	Of	18	Date	8/4/2022	Time	1043
Description	Litter observed on the southern end of Cell 5 with no controls in place.						



Location	City of Little Rock Class 1			Permit	0266-S1	AFIN	60-01071
Photographer	Kim Davenport, Inspector	<i>KD</i>		Witness	Ryan Hayden, Inspector Supervisor		
Photo #	6	Of	18	Date	8/4/2022	Time	1042
Description	Litter observed on the southern end of Cell 5 with no controls in place. Ponding observed.						



Division of Environmental Quality Official Photograph Sheet

Location	City of Little Rock Class 1	Permit	0266-S1	AFIN	60-01071
Photographer	Kim Davenport, Inspector	<i>KD</i>	Witness	Ryan Hayden, Inspector Supervisor	
Photo #	7	Of	18	Date	8/4/2022
Time	1050				
Description	The beginning of the trench is observed, allowing leachate to flow south from the working face. Exposed waste observed.				



Location	City of Little Rock Class 1	Permit	0266-S1	AFIN	60-01071
Photographer	Kim Davenport, Inspector	<i>KD</i>	Witness	Ryan Hayden, Inspector Supervisor	
Photo #	8	Of	18	Date	8/4/2022
Time	1045				
Description	The trench is observed running north to south on the east side of Cell 5, containing leachate and exposed waste. Depth estimated at 10'.				



Division of Environmental Quality Official Photograph Sheet

Location	City of Little Rock Class 1			Permit	0266-S1	AFIN	60-01071
Photographer	Kim Davenport, Inspector		<i>KD</i>	Witness	Ryan Hayden, Inspector Supervisor		
Photo #	9	Of	18	Date	8/4/2022	Time	1045
Description	A closer view of the trench is observed, containing leachate and exposed waste.						



Location	City of Little Rock Class 1			Permit	0266-S1	AFIN	60-01071
Photographer	Kim Davenport, Inspector		<i>KD</i>	Witness	Ryan Hayden, Inspector Supervisor		
Photo #	10	Of	18	Date	8/4/2022	Time	1047
Description	An overview of the trench is observed.						



Division of Environmental Quality Official Photograph Sheet

Location	City of Little Rock Class 1			Permit	0266-S1	AFIN	60-01071
Photographer	Kim Davenport, Inspector	<i>KD</i>		Witness	Ryan Hayden, Inspector Supervisor		
Photo #	11	Of	18	Date	8/4/2022	Time	1056
Description	Leachate observed pooling in depressions in Cell 5. Exposed waste and litter observed.						



Location	City of Little Rock Class 1			Permit	0266-S1	AFIN	60-01071
Photographer	Kim Davenport, Inspector	<i>KD</i>		Witness	Ryan Hayden, Inspector Supervisor		
Photo #	12	Of	18	Date	8/4/2022	Time	1131
Description	Leachate observed pooling in depressions in Cell 5. Piles of solid waste observed in the water.						



Division of Environmental Quality Official Photograph Sheet

Location	City of Little Rock Class 1			Permit	0266-S1	AFIN	60-01071
Photographer	Kim Davenport, Inspector	<i>KD</i>		Witness	Ryan Hayden, Inspector Supervisor		
Photo #	13	Of	18	Date	8/4/2022	Time	1144
Description	Leachate observed pooling in depressions in Cell 5. Exposed waste observed.						



Location	City of Little Rock Class 1			Permit	0266-S1	AFIN	60-01071
Photographer	Kim Davenport, Inspector	<i>KD</i>		Witness	Ryan Hayden, Inspector Supervisor		
Photo #	14	Of	18	Date	8/4/2022	Time	1144
Description	Leachate observed pooling in depressions in Cell 5. Exposed waste from the trench observed along the eastern side of Cell 5.						



Division of Environmental Quality Official Photograph Sheet

Location	City of Little Rock Class 1			Permit	0266-S1	AFIN	60-01071
Photographer	Kim Davenport, Inspector		<i>KD</i>	Witness	Ryan Hayden, Inspector Supervisor		
Photo #	15	Of	18	Date	8/4/2022	Time	1044
Description	Litter and exposed waste observed at the south end of Cell 5 where the sand barrier is exposed.						



Location	City of Little Rock Class 1			Permit	0266-S1	AFIN	60-01071
Photographer	Kim Davenport, Inspector		<i>KD</i>	Witness	Ryan Hayden, Inspector Supervisor		
Photo #	16	Of	18	Date	8/4/2022	Time	1233
Description	Exposed waste observed on the interim cover of Cell 9 (over Cell 2), looking south.						



Division of Environmental Quality Official Photograph Sheet

Location	City of Little Rock Class 1			Permit	0266-S1	AFIN	60-01071
Photographer	Kim Davenport, Inspector		<i>KD</i>	Witness	Ryan Hayden, Inspector Supervisor		
Photo #	17	Of	18	Date	8/4/2022	Time	1227
Description	Exposed waste observed at the drainage ditch below Cell 2.						



Location	City of Little Rock Class 1			Permit	0266-S1	AFIN	60-01071
Photographer	Kim Davenport, Inspector		<i>KD</i>	Witness	Ryan Hayden, Inspector Supervisor		
Photo #	18	Of	18	Date	8/4/2022	Time	1228
Description	Exposed waste observed at the drainage ditch below Cell 2.						

