



ARKANSAS

ENERGY & ENVIRONMENT

12/5/2022

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 November 8, 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 are 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 Kimberly.Davenport@adeq.state.ar.us.

Sincerely,

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



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**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 #	123664
Date	11/8/2022	Entry Time	1040	Exit Time	1220

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	A multi-use area was observed used for storage of uncovered roll-off containers containing putrescible waste and yard waste. Odor, vectors, and run-off were observed in this area. This storage area is not defined on any site map (Class 1, Class 4, or Compost Yard). (Refer to Photos #1 - #4.)
	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 was observed along the west side of the landfill access road, the north end of the active area, and the stormwater collection area had no controls in place. (Refer to Photos #5 - #10.)
	427	Surface Water Controls	
	411(h)(1)	Contouring Prevents Surface Water Flowing Into or Through Waste	
	418(a)(b)	Run-on/off Control System Present and Adequate	
	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	
	429	Leachate Collection System	

Category 3

	Regulation	Item Description	Comments
X	413(a)	Satisfactory Daily Cover	Solid waste observed stored outdoors in the undefined roll-off storage area was not incorporated into the working face and covered by the end of the work day. (Refer to Photos #1 - #3.) This also is a violation of Rule 22.411(d).
	419(a)(5)	Cause Discharge/Leachate Leaving Landfill	
	411(f)(3)	Depositing Waste in Standing Water Prohibited	
X	411(o)	Erosion or Other Cover Defects Resulting in Exposed Refuse	Erosion with exposed waste was observed on the west slope of Cell 5E. (Refer to Photos #7 - #9.)
	309(c)	Overfill/Off Lined Area	

Records					
Date of Last Annual Report	4/18/2022	Date of Last Quarterly Methane Monitoring	9/29/2022		
Date of Last Groundwater Monitoring Report	9/12/2022	Previous Quarter Waste Received	33,305.19 Tons		
Operator Name & Number					
Nathan Charles - 004315		Signature of Inspector			
Exit Interview Conducted with	Nathan Charles	Method	Via phone	Date	11/8/2022
		Time	1400		

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	N/A		
Photo #	1	Of	12	Date	11/8/2022	Time	1048
Description	A roll-off container was observed with putrescible waste (as evidenced by presence of vectors) and water. A strong odor was present.						



Location	City of Little Rock Class 1			Permit	0266-S1	AFIN	60-01071
Photographer	Kim Davenport, Inspector	<i>KD</i>		Witness	N/A		
Photo #	2	Of	12	Date	11/8/2022	Time	1049
Description	A closer view of the solid waste having an odor and attracting vectors (black dots).						



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	N/A		
Photo #	3	Of	12	Date	11/8/2022	Time	1049
Description	Run-off from the container was observed.						





Location	City of Little Rock Class 1			Permit	0266-S1	AFIN	60-01071
Photographer	Kim Davenport, Inspector	<i>KD</i>		Witness	N/A		
Photo #	4	Of	12	Date	11/8/2022	Time	1050
Description	Yard waste was observed stored in roll-offs and not incorporated with waste at any permitted area.						





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	N/A		
Photo #	5	Of	12	Date	11/8/2022	Time	1121
Description	Litter was observed on Cell1, looking southwest.						
							
Location	City of Little Rock Class 1			Permit	0266-S1	AFIN	60-01071
Photographer	Kim Davenport, Inspector	<i>KD</i>		Witness	N/A		
Photo #	6	Of	12	Date	11/8/2022	Time	1124
Description	Litter was observed on the north end of the active area at Cell 2, looking west.						
							

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	N/A		
Photo #	7	Of	12	Date	11/8/2022	Time	1125
Description	Litter and erosion were observed on the west slope of Cell 5E.						
							
Location	City of Little Rock Class 1			Permit	0266-S1	AFIN	60-01071
Photographer	Kim Davenport, Inspector	<i>KD</i>		Witness	N/A		
Photo #	8	Of	12	Date	11/8/2022	Time	1126
Description	Erosion with exposed waste was observed on the west slope of Cell 5E.						
							

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	N/A		
Photo #	9	Of	12	Date	11/8/2022	Time	1126
Description	Litter was observed on the northern end of the active cell at the toe of the western slope of Cell 5E.						
							
Location	City of Little Rock Class 1			Permit	0266-S1	AFIN	60-01071
Photographer	Kim Davenport, Inspector	<i>KD</i>		Witness	N/A		
Photo #	10	Of	12	Date	11/8/2022	Time	1206
Description	Litter was observed on the outer perimeter of the active cell, looking east.						
							

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	N/A	
Photo #	11	Of	12	Date	11/8/2022
Description	Google Earth image showing location of multi-use area.				



Location	City of Little Rock Class 1	Permit	0266-S1	AFIN	60-01071
Photographer	Kim Davenport, Inspector	<i>KD</i>	Witness	N/A	
Photo #	12	Of	12	Date	11/8/2022
Description	Google Earth image showing zoomed in location of multi-use area shown in Photo #11.				

