



ARKANSAS

ENERGY & ENVIRONMENT

3/13/2023

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 February 15, 2023
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 # | 501-888-4493 | Permit # | 0266-S1 |
| Permittee Address | 10803 Ironton Cutoff, Little Rock, AR 72206 | Email Address | ncharles@littlerock.gov | PDS # | 124934 |
| Date | 2/15/2023 | Entry Time | 1240 | Exit Time | 1320 |

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 | The roll-off storage area is not defined on any site map (Class 1, Class 4, or Compost Yard). (Refer to Photo #1.) |
| | 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 surrounding the unlined stormwater collection area, located between Cell 2 and unconstructed Cell 3, with no controls in place. (Refer to Photos # 2 & #3.) |
| | 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 |
|---|-------------------|--|--|
| | 413(a)(b)(c) | Satisfactory Daily/Alternate/Intermediate Cover | |
| | 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 Photo #4.) Cover defects resulting in exposed waste were observed across the southern active area of Cell 5W. (Refer to Photos #5 & #6.) |
| | 309(c) | Overfill/Off Lined Area | |



Records

| | | | | | | | |
|---|-------------------------|--|----------------|---|-----------|-------------|------|
| Date of Last Annual Report | 4/18/2022 | Date of Last Quarterly Methane Monitoring | 1/23/2023 | | | | |
| Date of Last Groundwater Monitoring Report | 2/20/2023 | 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 | 2/16/2023 | Time | 0900 |

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 | 6 | Date | 2/15/2023 | Time | 1302 |
| Description | Photo provided to show the roll-off storage area located north of the stormwater pond. | | | | | | |
|  | | | | | | | |
| 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 | 6 | Date | 2/15/2023 | Time | 1334 |
| Description | Litter was observed in the stormwater run-off area leading to the unlined storm water detention area with no controls in place. | | | | | | |
|  | | | | | | | |

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 | 6 | Date | 2/15/2023 | Time | 1335 |
| Description | Litter was observed at the north end of the unlined stormwater collection 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 # | 4 | Of | 6 | Date | 2/15/2023 | Time | 1416 |
| Description | Erosion with exposed waste 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 # | 5 | Of | 6 | Date | 2/15/2023 |
| Time | 1443 | | | | |
| Description | An example is provided of the cover defects observed on the south end of Cell 5E, looking north. | | | | |



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|---------------------|--|---------------|----------------|-------------|-----------|
| 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 | 6 | Date | 2/15/2023 |
| Time | 1415 | | | | |
| Description | An example is provided of the cover defects observed on the south end of Cell 5, looking east. | | | | |

