



# ARKANSAS

## ENERGY & ENVIRONMENT

5/25/2023

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 May 10, 2023**  
**AFIN 60-01071**  
**Permit Number 0266-S4J**

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 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](mailto:Kimberly.Davenport@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

cc: Nicholas Jones P.E., Senior Operations Manager, Office of Land Resources



**Office of Land Resources  
Regulated Waste Operations  
Class 4 Landfill Inspection Form**

<b>Site Name</b>	City of Little Rock Class 4 Landfill	<b>County</b>	Pulaski	<b>AFIN</b>	60-01071
<b>Facility Address</b>	10803 Ironton Road, Little Rock, AR	<b>Phone #</b>	501-888-4493	<b>Permit #</b>	0266-S4J
<b>Permittee Address</b>	10803 Ironton Road, Little Rock, AR	<b>Email Address</b>	<a href="mailto:ncharles@littlerock.gov">ncharles@littlerock.gov</a>	<b>PDS #</b>	125981
<b>Date</b>	5/10/2023	<b>Entry Time</b>	1152	<b>Exit Time</b>	1455

**Operational Standards**

**Category 1**


	<b>Regulation</b>	<b>Item Description</b>	<b>Comments</b>
	617(a)(b)	Record Keeping Requirements Specified by Regulations	
	607(j)	Adequate Provisions for Backup Equipment	
	619	Annual Compliance Inspection by Registered Professional Engineer	

**Category 2**

	<b>Regulation</b>	<b>Item Description</b>	<b>Comments</b>
X	607(a)	Operations in Accordance with Permit Documents	The last approved operating plan is dated 1996 and requires updating. Refer to Doc #3716 dated July 26, 1996. An OP (Doc #60665) was submitted in 2011 but has never been approved and is now also out of date. Due to the joined permit of the Class 1 & 4, the same operating plan addresses both the Class 1 & 4 landfills.
	613(c)	Adequate All Weather Operational Roads	
	607(c)(d)	Smallest Practical Area, Single Working Face	
	607(b)	Operations by Licensed On-site Personnel at All Times	
	607(g)	Litter Control Provisions Maintained	
	622	Survey Controls	
	623	Surface Water Controls	
	607(h)(1)	Contouring Prevents Surface Water Flowing Into or Through Waste	
	607(h)(2)	Surface Water Control Prevents Off-site Sediment Accumulation	
	607(i)(o)	Adequate Maintenance of Intermediate/Final Cover Vegetation	
	607(o)	Leachate Leaks or Evidence of Leachate Seepage	

**Category 3**

	<b>Regulation</b>	<b>Item Description</b>	<b>Comments</b>
	608	Implementation of Hazardous Waste Exclusion Plan	
	609(a)	Satisfactory Weekly or More Frequent Cover	
	609(b)	Satisfactory Intermediate Cover	
	615	Cause Discharge/Leachate Discharge Leaving Landfill	
X	607(o)	Erosion or Other Cover Defects Resulting in Exposed Refuse	Cover defects resulting in exposed waste were observed across the eastern top deck and north slope of Cell 3. (Refer to Photos #2 - #6.) The dozer generally assigned to the operation of the Class 4 Landfill is being utilized on the Class 1 Landfill due to equipment breakdown. The Facility could not provide a timeframe for the completion of repairs.
	309(c)	Overfill/Off Lined Area	

Records							
<b>Date of Last Annual Report</b>	6/30/2022	<b>Date of Last Quarterly Methane Monitoring</b>	N/A				
<b>Date of Last Groundwater Monitoring Report</b>	N/A	<b>Previous Quarter Waste Received</b>	1,572.77 Tons				
<b>Operator Name &amp; Number</b>	Nathan Charles- 004315	<b>Signature of Inspector</b>					
<b>Exit Interview Conducted with</b>	Nathan Charles	<b>Method</b>	Via phone	<b>Date</b>	5/10/2023	<b>Time</b>	1430

## Division of Environmental Quality Official Photograph Sheet


<b>Location</b>	City of Little Rock Class 4			<b>Permit</b>	0266-S4J	<b>AFIN</b>	60-01071
<b>Photographer</b>	Kim Davenport, Inspector	<i>KD</i>		<b>Witness</b>	N/A		
<b>Photo #</b>	1	<b>Of</b>	6	<b>Date</b>	5/10/2023	<b>Time</b>	1327
<b>Description</b>	The active working face and all available equipment for the Class 4 was observed.						




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<b>Photographer</b>	Kim Davenport, Inspector	<i>KD</i>		<b>Witness</b>	N/A		
<b>Photo #</b>	2	<b>Of</b>	6	<b>Date</b>	5/10/2023	<b>Time</b>	1328
<b>Description</b>	Exposed waste was observed across the Class 4 landfill and on the northern slope, looking east.						



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<b>Photographer</b>	Kim Davenport, Inspector	<i>KD</i>		<b>Witness</b>	N/A		
<b>Photo #</b>	3	<b>Of</b>	6	<b>Date</b>	5/10/2023	<b>Time</b>	1328
<b>Description</b>	A closer view of the exposed waste observed across the active cell is provided.						
							
<b>Location</b>	City of Little Rock Class 4			<b>Permit</b>	0266-S4J	<b>AFIN</b>	60-01071
<b>Photographer</b>	Kim Davenport, Inspector	<i>KD</i>		<b>Witness</b>	N/A		
<b>Photo #</b>	4	<b>Of</b>	6	<b>Date</b>	5/10/2023	<b>Time</b>	1329
<b>Description</b>	A continued view of exposed waste observed on the northern slope is provided, looking east.						
							

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<b>Photographer</b>	Kim Davenport, Inspector	<i>KD</i>		<b>Witness</b>	N/A		
<b>Photo #</b>	5	<b>Of</b>	6	<b>Date</b>	5/10/2023	<b>Time</b>	1328
<b>Description</b>	An example of the erosion rills exposing waste on the northern slope is provided.						
							
<b>Location</b>	City of Little Rock Class 4			<b>Permit</b>	0266-S4J	<b>AFIN</b>	60-01071
<b>Photographer</b>	Kim Davenport, Inspector	<i>KD</i>		<b>Witness</b>	N/A		
<b>Photo #</b>	6	<b>Of</b>	6	<b>Date</b>	5/10/2023	<b>Time</b>	1329
<b>Description</b>	Another close up view of the exposed waste observed across the active cell is provided.						
