



# ARKANSAS

## ENERGY & ENVIRONMENT

5/30/2023

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-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](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



**ARKANSAS**  
ENERGY & ENVIRONMENT

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

<b>Site Name</b>	City of Little Rock Class 1 Landfill	<b>County</b>	Pulaski	<b>AFIN</b>	60-01071
<b>Facility Address</b>	10803 Ironton Cutoff, Little Rock, AR 72206	<b>Phone #</b>	501-888-4493	<b>Permit #</b>	0266-S1
<b>Permittee Address</b>	10803 Ironton Cutoff, Little Rock, AR 72206	<b>Email Address</b>	<a href="mailto:ncharles@littlerock.gov">ncharles@littlerock.gov</a>	<b>PDS #</b>	
<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>
	417	Access Requirements	
	411(j)	Adequate Provision for Backup Equipment	Multiple pieces of equipment were observed non-functional with no time-line for repair. (Refer to Photos #1 & #2.)
	423(b)	Annual Compliance Inspection by Registered Engineer	

**Category 2**

	<b>Regulation</b>	<b>Item Description</b>	<b>Comments</b>
X	411(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.
X	411(c)	Smallest Practical Area, Unloading Supervised, Single Working Face	The 2 <sup>nd</sup> approved working face was not confined to the smallest practical area. It measured approximately 400' x 300'. (Refer to Photos #3 & #4.)
	411(b)	Operations by Licensed On-site Personnel at All Times	
X	411(g)	Litter Control Provisions Maintained	Litter was observed entering and surrounding the unlined stormwater collection area, located northwest of Cell 5, with no litter controls in place. (Refer to Photos # 4 - #12 & #15.)
X	427(a)	Surface Water Controls	The facility does not have an approved design narrative describing methods to control surface water. Refer to 411(a).
	411(h)(1)	Contouring Prevents Surface Water Flowing Into or Through Waste	
X	418(a) & (b)	Run-on/off Control System Present and Adequate	Run-on /Run-off controls were not in place to control the water volume resulting from the storm observed during the inspection. (Refer to Photos #3 - #12.)
	411(h)(2)	Surface Water Control Prevents Off-site Sediment Accumulation	
X	411(i)	Adequate Maintenance of Intermediate/Final Cover Vegetation	Woody vegetation was observed on the northern slope of Cell 2. (Refer to Photo #18.)
	415(a)(1)(2)	Gas Monitoring Program	
X	411(o)	Leachate Leaks or Evidence of Leachate Seepage	Runoff containing waste (leachate) from the active area was observed entering the stormwater ditches and the stormwater pond. (Refer to Photos #3 - #12.) In addition, dark colored water with an oily sheen (leachate) was observed along the western slope of the stormwater pond. (Refer to Photos #13 & #14.)
	429	Leachate Collection System	
X	411(d)	Waste spreading and compacting	Waste placed in the 2 <sup>nd</sup> approved working face was not spread or compacted. (Refer to Photo #3 & 4.)

**Category 3**

	<b>Regulation</b>	<b>Item Description</b>	<b>Comments</b>
X	413(a)	Satisfactory Daily	The 2 <sup>nd</sup> approved working face has received no daily cover since they began accepting the FEMA waste, as confirmed by the Operator, Raymond Bell, and Nathan Charles. (Refer to Photos #3 & #4.) The approval document in the database is dated April 26, 2023. (Refer to

			Doc #83935.)			
X	413(b)	Alternate Cover Materials	The previous days' working face working face was observed with insufficient cover. They were using an approved ADC. (Refer to Photo #19.)			
X	419(a)(5)	Cause Discharge/Leachate Leaving Landfill	Leachate was observed pooling in the unlined area referenced as the stormwater pond. (Refer to Photo #10 - #15.)			
	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 and north slopes of Cell 2. (Refer to Photo #11, #12, #16 - #18.)			
X	309(c)	Overfill/Off Lined Area	Partially buried waste was observed in the truck cleanout area, located north of the fueling station, which is off the lined area and is not permitted for waste disposal. (Refer to Photos #20 - #22.)			
<b>Records</b>						
<b>Date of Last Annual Report</b>		3/30/2023	<b>Date of Last Quarterly Methane Monitoring</b>		3/28/2023	
<b>Date of Last Groundwater Monitoring Report</b>		2/20/2023	<b>Previous Quarter Waste Received</b>		36,173.77 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 1			<b>Permit</b>	0266-S1	<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>	22	<b>Date</b>	5/10/2023	<b>Time</b>	1344
<b>Description</b>	A piece of non-functional equipment was observed. No timeline for repair was provided.						



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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>	22	<b>Date</b>	5/10/2023	<b>Time</b>	1446
<b>Description</b>	An example is provided of another piece of non-functional equipment observed with no timeline for repair.						



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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>	22	<b>Date</b>	5/10/2023	<b>Time</b>	1342
<b>Description</b>	A view of active Cell 5W is observed, looking south from the top of Cell 2. Two (2) pieces of equipment (red arrows) observed working there. The FEMA working face is shown in the foreground, measuring approximately 400' x 300'. Waste was observed that had not been spread or compacted (red circle). No daily cover requirements have been met since the facility started taking FEMA waste. No stormwater or litter controls were observed in place in or around the active areas.						



<b>Location</b>	City of Little Rock Class 1			<b>Permit</b>	0266-S1	<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>	22	<b>Date</b>	5/10/2023	<b>Time</b>	1343
<b>Description</b>	Another view of the active Cell 5W and the 2 <sup>nd</sup> approved working face for FEMA waste (red circle). No daily cover has been placed upon the 2 <sup>nd</sup> working face since they began accepting it. Waste placed in the 2 <sup>nd</sup> working face was not spread or compacted (blue circle). No stormwater or litter controls were in place in or around the active area.						



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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>	22	<b>Date</b>	5/10/2023	<b>Time</b>	1408
<b>Description</b>	The path of stormwater (leachate) is shown, exiting the working face via the haul road located on the west side of Cell 5W. Waste was observed in the stormwater (leachate).						
							
<b>Location</b>	City of Little Rock Class 1			<b>Permit</b>	0266-S1	<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>	22	<b>Date</b>	5/10/2023	<b>Time</b>	1408
<b>Description</b>	The continued path of stormwater (leachate) leaving the working face was observed containing waste.						
							



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<b>Location</b>	City of Little Rock Class 1			<b>Permit</b>	0266-S1	<b>AFIN</b>	60-01071
<b>Photographer</b>	Kim Davenport, Inspector	<i>KD</i>		<b>Witness</b>	N/A		
<b>Photo #</b>	7	<b>Of</b>	22	<b>Date</b>	5/10/2023	<b>Time</b>	1447
<b>Description</b>	The continued path of stormwater (leachate) leaving the working face was observed containing waste.						
							
<b>Location</b>	City of Little Rock Class 1			<b>Permit</b>	0266-S1	<b>AFIN</b>	60-01071
<b>Photographer</b>	Kim Davenport, Inspector	<i>KD</i>		<b>Witness</b>	N/A		
<b>Photo #</b>	8	<b>Of</b>	22	<b>Date</b>	5/10/2023	<b>Time</b>	1408
<b>Description</b>	A closer view of the waste in the stormwater ditch shown in Photos #6 & #7 observed.						
							



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<b>Location</b>	City of Little Rock Class 1			<b>Permit</b>	0266-S1	<b>AFIN</b>	60-01071
<b>Photographer</b>	Kim Davenport, Inspector	<i>KD</i>		<b>Witness</b>	N/A		
<b>Photo #</b>	9	<b>Of</b>	22	<b>Date</b>	5/10/2023	<b>Time</b>	1400
<b>Description</b>	A view of the end of the stormwater ditch shown in Photos #6 - #8 is provided to show the amount of waste which has migrated from the working face.						
							
<b>Location</b>	City of Little Rock Class 1			<b>Permit</b>	0266-S1	<b>AFIN</b>	60-01071
<b>Photographer</b>	Kim Davenport, Inspector	<i>KD</i>		<b>Witness</b>	N/A		
<b>Photo #</b>	10	<b>Of</b>	22	<b>Date</b>	5/10/2023	<b>Time</b>	1358
<b>Description</b>	An additional view of the end of the stormwater ditch shown in Photos #6 - #9 is provided to show the amount of waste which has migrated from the working face to the unlined stormwater pond observed in the background.						
							



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<b>Photographer</b>	Kim Davenport, Inspector	<i>KD</i>		<b>Witness</b>	N/A		
<b>Photo #</b>	11	<b>Of</b>	22	<b>Date</b>	5/10/2023	<b>Time</b>	1359
<b>Description</b>	The pond from Photo #10 was observed black in color. Active rainfall during the inspection was observed introducing waste and sediment into the unlined pond. Litter was also observed on the west slope of Cell 2 (red circle).						
							
<b>Location</b>	City of Little Rock Class 1			<b>Permit</b>	0266-S1	<b>AFIN</b>	60-01071
<b>Photographer</b>	Kim Davenport, Inspector	<i>KD</i>		<b>Witness</b>	N/A		
<b>Photo #</b>	12	<b>Of</b>	22	<b>Date</b>	5/10/2023	<b>Time</b>	1359
<b>Description</b>	A view of the south end of the unlined pond is provided to show the eroded west slope of Cell 2 and solid waste entering the pond. No stormwater or litter controls were observed in place.						
							

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<b>Location</b>	City of Little Rock Class 1			<b>Permit</b>	0266-S1	<b>AFIN</b>	60-01071
<b>Photographer</b>	Kim Davenport, Inspector	<i>KD</i>		<b>Witness</b>	N/A		
<b>Photo #</b>	13	<b>Of</b>	22	<b>Date</b>	5/10/2023	<b>Time</b>	1311
<b>Description</b>	A dirt path leading to the pond shown in Photos #10 - #12 was observed on the western side of the pond.						
							
<b>Location</b>	City of Little Rock Class 1			<b>Permit</b>	0266-S1	<b>AFIN</b>	60-01071
<b>Photographer</b>	Kim Davenport, Inspector	<i>KD</i>		<b>Witness</b>	N/A		
<b>Photo #</b>	14	<b>Of</b>	22	<b>Date</b>	5/10/2023	<b>Time</b>	1312
<b>Description</b>	A view of discolored water with an oily sheen (leachate) was observed in the soil shown in Photo #13.						
							

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<b>Location</b>	City of Little Rock Class 1			<b>Permit</b>	0266-S1	<b>AFIN</b>	60-01071
<b>Photographer</b>	Kim Davenport, Inspector	<i>KD</i>		<b>Witness</b>	N/A		
<b>Photo #</b>	15	<b>Of</b>	22	<b>Date</b>	5/10/2023	<b>Time</b>	1315
<b>Description</b>	An overview is provided of the pond shown in Photos #10 - #13. The pond is located in an unlined area. Solid waste was observed on the banks of the pond and in the water (leachate).						
							
<b>Location</b>	City of Little Rock Class 1			<b>Permit</b>	0266-S1	<b>AFIN</b>	60-01071
<b>Photographer</b>	Kim Davenport, Inspector	<i>KD</i>		<b>Witness</b>	N/A		
<b>Photo #</b>	16	<b>Of</b>	22	<b>Date</b>	5/10/2023	<b>Time</b>	1344
<b>Description</b>	Erosion with exposed waste at the west slope of Cell 2, looking southwest.						
							

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<b>Location</b>	City of Little Rock Class 1	<b>Permit</b>	0266-S1	<b>AFIN</b>	60-01071
<b>Photographer</b>	Kim Davenport, Inspector	<i>KD</i>	<b>Witness</b>	N/A	
<b>Photo #</b>	17	<b>Of</b>	22	<b>Date</b>	5/10/2023
<b>Description</b>	Erosion with exposed waste was observed on the north slope of Cell 2.				



<b>Location</b>	City of Little Rock Class 1	<b>Permit</b>	0266-S1	<b>AFIN</b>	60-01071
<b>Photographer</b>	Kim Davenport, Inspector	<i>KD</i>	<b>Witness</b>	N/A	
<b>Photo #</b>	18	<b>Of</b>	22	<b>Date</b>	5/10/2023
<b>Description</b>	Exposed waste and woody vegetation (red circle) was observed on the north slope of Cell 2.				



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<b>Photographer</b>	Kim Davenport, Inspector	<i>KD</i>		<b>Witness</b>	N/A		
<b>Photo #</b>	19	<b>Of</b>	22	<b>Date</b>	5/10/2023	<b>Time</b>	1404
<b>Description</b>	The previous days' working face working face was observed with insufficient cover. They were using an approved ADC.						



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<b>Photographer</b>	Kim Davenport, Inspector	<i>KD</i>		<b>Witness</b>	N/A		
<b>Photo #</b>	20	<b>Of</b>	22	<b>Date</b>	5/10/2023	<b>Time</b>	1224
<b>Description</b>	An overview of the truck cleanout area is provided for location reference. The area of concern is circled in red.						



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<b>Photographer</b>	Kim Davenport, Inspector	<i>KD</i>		<b>Witness</b>	N/A		
<b>Photo #</b>	21	<b>Of</b>	22	<b>Date</b>	5/10/2023	<b>Time</b>	1226
<b>Description</b>	An example is provided of partially buried waste located in the area of concern shown in Photo #20.						
							
<b>Location</b>	City of Little Rock Class 1			<b>Permit</b>	0266-S1	<b>AFIN</b>	60-01071
<b>Photographer</b>	Kim Davenport, Inspector	<i>KD</i>		<b>Witness</b>	N/A		
<b>Photo #</b>	22	<b>Of</b>	22	<b>Date</b>	5/10/2023	<b>Time</b>	1225
<b>Description</b>	Another example is provided of partially buried waste located in the area of concern shown in Photo #20.						
