



DIVISION OF
ENVIRONMENTAL QUALITY

127012

Sarah Huckabee Sanders
GOVERNOR

Shane E. Khoury
SECRETARY

8/14/2023

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 July 31, 2023
AFIN 60-01071
Permit Number 0031-SCYW

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'.

Kim Davenport
Solid Waste Inspector Supervisor

cc: Heath Cobb, Senior Compliance Manager, Regulated Waste Operations

**Office of Land Resources
Regulated Waste Operations
Compost Inspection Form**

Site Name	City of Little Rock Compost Yard	County	Pulaski	AFIN	60-01071
Facility Address	10803 Ironton Cutoff, Little Rock, AR	Phone #	501-888-4493	Permit #	0031-SCYW
Permittee Address	10803 Ironton Cutoff, Little Rock, AR	Email Address	ncharles@littlerock.gov	PDS #	127012
Date	7/31/2023	Entry Time	0938	Exit Time	1225
Classification	X	Y – Yard Waste		O – Source Separated Organic Waste	
				S – Mixed Solid Waste	

Operational Standards

Category 1

	Regulation	Item Description	Comments
	804	Application Requirements	
	805(b)(1); (c)(5)	Operating Records Maintained	
X	805(b)(2)	Conforms to Operating Plan	Document #81838 describes the compost yard as a 20-acre asphalt paved site where aerobic compost occurs. This document also states, in part, no changes in the current method of operations were required. Comment: The western half of the asphalt pad is no longer present and operations have had to be moved eastern portion of the pad. (Refer to Photo # 1.)
	806(a)(4); (b)(9)	Site Access & Security Measures	
X	808(a)(2)(4)	Record Keeping & Reporting	An annual report has not been submitted for 2022 and was due by March 31. Incoming waste totals have not been provided as requested.


Category 2

	Regulation	Item Description	Comments
	805(a)(2)	Operations Follow Acceptable Methods	
	805(a)(3)	Operations Performed by Licensed Operator	
	805(a)(4); (b)(2)	Monitoring Types of Waste Received	
	805(c)(2) Type O&S	Daily Temperature Readings Recorded	
	805(c)(4) Type O&S	Finished Compost not Sold Within 6 Months	
	805(c)(3) Type O&S	Processing of Incoming Waste Within 3 Days	
X	806(a)(2)	Adequate Composting Area Surface	Ponding water was observed in depressions across the eastern side of the compost yard. (Refer to Photo #2.)
X	806(a)(5)	Odor, Noise, Dust, Vector & Litter Control	Litter was observed outside of the litter fence, on the northern side of the compost yard. (Refer to Photo # 3.)
	806(a)(6); (b)(11)	Handle and Remove Unacceptable Waste	
	807(a)(b)(c); 808(b)(9) Type O&S	Testing of Run-off and Compost	

Category 3

	Regulation	Item Description	Comments
	805(a)(1)	Operations Preclude Pollution	
	805(c)(1) Type O&S	Compost Process Meets PFRP	
	805(c)(3) Type O&S	Adequate Leachate and NPDES Control Measures	
	805(a)(3); (b)(7)	Control for Stormwater, Run-off & NPDES	
	806(b)(8) Type O&S	Leachate Collection and Removal System	
	809(a)(b)(c)	Compost Utilization	

Records

Date of Last Annual Report	4/18/2022	Previous Month's Waste Received	Not provided		
Operator Name & Number	Raymond Bell- 000561	Signature of Inspector			
Exit Interview Conducted with	Nathan Charles	Method	Via phone	Date	8/1/2023
				Time	0906

Division of Environmental Quality Official Photograph Sheet

Location	City of Little Rock Compost Yard			Permit	0031-SCYW	AFIN	60-01071
Photographer	Kim Davenport, Inspector		<i>KD</i>	Witness	N/A		
Photo #	1	Of	3	Date	7/31/2023	Time	0942
Description	Operational change: The western half of the compost yard is vegetated and no longer in use.						



Location	City of Little Rock Compost Yard			Permit	0031-SCYW	AFIN	60-01071
Photographer	Kim Davenport, Inspector		<i>KD</i>	Witness	N/A		
Photo #	2	Of	3	Date	7/31/2023	Time	0956
Description	A depression in the eastern compost yard was observed with ponding water.						



Division of Environmental Quality Official Photograph Sheet

Location	City of Little Rock Compost Yard			Permit	0031-SCYW	AFIN	60-01071
Photographer	Kim Davenport, Inspector		<i>KD</i>	Witness	N/A		
Photo #	3	Of	3	Date	7/31/2023	Time	0950
Description	Litter was observed collecting outside the fence, near the northern stormwater pond.						
