



DIVISION OF
ENVIRONMENTAL QUALITY

127014

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 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.

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

**Division of Environmental Quality
Office of Land Resources
Class 4 Landfill Inspection Form**

Site Name	City of Little Rock Class 4 Landfill	County	Pulaski	AFIN	60-01071
Facility Address	10803 Ironton Road, Little Rock, AR	Phone #	501-888-4493	Permit #	0266-S4J
Permittee Address	10803 Ironton Road, Little Rock, AR	Email Address	ncharles@littlerock.gov	PDS #	127014
Date	7/31/2023	Entry Time	0938	Exit Time	1225

Operational Standards

Category 1


	Regulation	Item Description	Comments
X	617(b)	Record Keeping Requirements Specified by Regulations	Incoming waste totals were not provided as requested by inspector.
	607(j)	Adequate Provisions for Backup Equipment	
	619	Annual Compliance Inspection by Registered Professional Engineer	

Category 2


	Regulation	Item Description	Comments
X	607(a)	Operations in Accordance with Permit Documents	The last approved Operating Plan (OP) 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 OP 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

	Regulation	Item Description	Comments
	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 top deck of the landfill. Erosion with exposed waste observed on the north slope of Cell 3. (Refer to Photos #1 & #2.)
	309(c)	Overfill/Off Lined Area	

Records							
Date of Last Annual Report	6/8/2023	Date of Last Quarterly Methane Monitoring	N/A				
Date of Last Groundwater Monitoring Report	N/A	Previous Quarter 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 Class 4			Permit	0266-S4J	AFIN	60-01071
Photographer	Kim Davenport		<i>KD</i>	Witness	N/A		
Photo #	1	Of	2	Date	7/31/2023	Time	1103
Description	Cover defects resulting in exposed waste were observed across the top deck of the landfill.						
							
Location	City of Little Rock Class 4			Permit	0266-S4J	AFIN	60-01071
Photographer	Kim Davenport		<i>KD</i>	Witness	N/A		
Photo #	2	Of	2	Date	7/31/2023	Time	1059
Description	Erosion with exposed waste observed on the north slope of Cell 3.						
