

September 12, 2023

Kim Davenport, Inspector  
Arkansas Department of Environmental Quality  
Solid Waste Management Division  
5301 Northshore Drive  
North Little Rock, AR 72118-5317

Re: Quarterly Inspection, AFIN 60-01071, Permit Number 0266-S1

Dear Ms. Davenport:

In response to your inspection of July 31, 2023, the following is a list of comments and corrective actions to be undertaken on the City of Little Rock's Class 1:

Class 1 Landfill, Permit Number 0266-S1

- **Category 2, Regulation 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 An OP was submitted in 2011 but has never been approved and is now also out of date.*  
The City has recently updated the Operating Plan and will submit to the Department.
- **Category 2, Regulation 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.*  
The City will continue to install litter controls around the active landfill cell, and will continue to use labor crews to pick up litter on site.
- **Category 3, Regulation 419(a)(5): Cause Discharge/Leachate Leaving Landfill.**  
*Leachate was observed pooling in the unlined area referenced as the stormwater pond.*  
Landfill supervisors have been instructed to eliminate leachate leaks as soon as they are discovered. If leachate does enter the stormwater pond, the water is pumped back into the cell to the leachate collection system.
- **Category 3, Regulation 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.*

The City will continue to work on erosion problems on slopes with exposed waste. Wood chips have been placed on slopes as a temporary erosion control measure.

- **Category 3, Regulation 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.*

All of the waste has been collected and properly disposed that was in this area. A new wash station is going to be built with a collection system to prevent this occurrence.

Thank you for your cooperation in this matter. If I can be of any further assistance please contact me at your convenience.

Sincerely,



Nathan Charles, PE  
Solid Waste Manager