



DIVISION OF
ENVIRONMENTAL QUALITY

127024

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-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.

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 1 Landfill Inspection Form**

Site Name	City of Little Rock Class 1 Landfill	County	Pulaski	AFIN	60-01071
Facility Address	10803 Ironton Cutoff, Little Rock, AR 72206	Phone #	501-888-4493	Permit #	0266-S1
Permittee Address	10803 Ironton Cutoff, Little Rock, AR 72206	Email Address	ncharles@littlerock.gov	PDS #	127024
Date	7/31/2023	Entry Time	0938	Exit Time	1225

Operational Standards

Category 1

	Regulation	Item Description	Comments
	417	Access Requirements	
	411(j)	Adequate Provision for Backup Equipment	
	423(b)	Annual Compliance Inspection by Registered Engineer	

Category 2

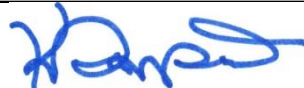
	Regulation	Item Description	Comments
X	411(a)	Operations in Accordance with Permit Documents	The last approved Operating Plan (OP) is dated 1996 and requires updating. (Refer to Doc #3716, dated July 26, 1996.) An OP (Doc #60665) was submitted in 2011 but has never been approved and is now also out of date. Alternate daily cover (ADC) was observed on the exterior slope of Cell 9, above Cell 2, without approval. (Refer to Doc #s 31984 & 83935 & Photo #1.) In addition, vegetation was observed growing through the sand layer of Cell 5W at the unused south end. This sand layer is part of the bottom liner. (Refer to DOC #79083 and Photo #13.)
	411(c)	Smallest Practical Area, Unloading Supervised, Single Working Face	
	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, and in the unused south portion of Cell 5W, with no litter controls in place. (Refer to Photos #2 - #4.)
	427	Surface Water Controls	
	411(h)(1)	Contouring Prevents Surface Water Flowing Into or Through Waste	
	418(a)(b)	Run-on/off Control System Present and Adequate	
	411(h)(2)	Surface Water Control Prevents Off-site Sediment Accumulation	
	411(i)	Adequate Maintenance of Intermediate/Final Cover Vegetation	
	415	Gas Monitoring Program	
	411(o)	Leachate Leaks or Evidence of Leachate Seepage	
	429	Leachate Collection System	

Category 3

	Regulation	Item Description	Comments
	413(a)(b)(c)	Satisfactory Daily/Alternate/Intermediate Cover	
X	419(a)(5)	Cause Discharge/Leachate Leaving Landfill	Leachate was observed running into the unlined area referenced as the stormwater pond. (Refer to Photos #3 & #6.)
	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 slope of Cell 2, the north slope of Cell 1, the west slope of Cell 5E, the south exterior wall of Cell 5W. (Refer to Photos #3 & #5-#10.) Cover defects resulting in exposed waste in ADC was observed across active Cell 5W and the south end of Cell 5W. (Refer to Photos #4, #12.)
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 Photo #14.)

Records

Date of Last Annual Report	3/30/2023	Date of Last Quarterly Methane Monitoring	12/2/2022
Date of Last Groundwater Monitoring Report	2/20/2023	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 1			Permit	0266-S1	AFIN	60-01071
Photographer	Kim Davenport		<i>KD</i>	Witness	N/A		
Photo #	1	Of	14	Date	7/31/2023	Time	1114
Description	Alternate daily cover (ADC) was observed on the exterior slope of Cell 9, above Cell 2, without approval.						



Location	City of Little Rock Class 1			Permit	0266-S1	AFIN	60-01071
Photographer	Kim Davenport		<i>KD</i>	Witness	N/A		
Photo #	2	Of	14	Date	7/31/2023	Time	1146
Description	Litter observed entering the unlined stormwater pond northwest of Cell 2.						



Division of Environmental Quality Official Photograph Sheet

Location	City of Little Rock Class 1			Permit	0266-S1	AFIN	60-01071
Photographer	Kim Davenport		<i>KD</i>	Witness	N/A		
Photo #	3	Of	14	Date	7/31/2023	Time	1148
Description	Litter and exposed solid waste observed on the west slope of Cell 2.						
							
Location	City of Little Rock Class 1			Permit	0266-S1	AFIN	60-01071
Photographer	Kim Davenport		<i>KD</i>	Witness	N/A		
Photo #	4	Of	14	Date	7/31/2023	Time	1205
Description	Litter was observed (foreground) and exposed waste observed at the south end of Cell 5W.						
							

Division of Environmental Quality Official Photograph Sheet

Location	City of Little Rock Class 1			Permit	0266-S1	AFIN	60-01071
Photographer	Kim Davenport		<i>KD</i>	Witness	N/A		
Photo #	5	Of	14	Date	7/31/2023	Time	1118
Description	Erosion with exposed waste was observed on the west slope of Cell 5E.						



Location	City of Little Rock Class 1			Permit	0266-S1	AFIN	60-01071
Photographer	Kim Davenport		<i>KD</i>	Witness	N/A		
Photo #	6	Of	14	Date	7/31/2023	Time	1148
Description	A closer view of the area shown in Photo #3, to show the leachate flowing into the stormwater pond. The path is shown by red arrows.						



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Location	City of Little Rock Class 1			Permit	0266-S1	AFIN	60-01071
Photographer	Kim Davenport		<i>KD</i>	Witness	N/A		
Photo #	7	Of	14	Date	7/31/2023	Time	1118
Description	Erosion with exposed waste was observed on the north slope of Cell 1.						



Location	City of Little Rock Class 1			Permit	0266-S1	AFIN	60-01071
Photographer	Kim Davenport		<i>KD</i>	Witness	N/A		
Photo #	8	Of	14	Date	7/31/2023	Time	1118
Description	Exposed waste was observed on the west slope of Cell 5E.						



Division of Environmental Quality Official Photograph Sheet

Location	City of Little Rock Class 1			Permit	0266-S1	AFIN	60-01071
Photographer	Kim Davenport	<i>KD</i>		Witness	N/A		
Photo #	9	Of	14	Date	7/31/2023	Time	1125
Description	Exposed waste was observed on the west slope of Cell 5E.						



Location	City of Little Rock Class 1			Permit	0266-S1	AFIN	60-01071
Photographer	Kim Davenport	<i>KD</i>		Witness	N/A		
Photo #	10	Of	14	Date	7/31/2023	Time	1127
Description	Exposed waste was observed on the west slope of Cell 5E.						



Division of Environmental Quality Official Photograph Sheet

Location	City of Little Rock Class 1			Permit	0266-S1	AFIN	60-01071
Photographer	Kim Davenport		<i>KD</i>	Witness	N/A		
Photo #	11	Of	14	Date	7/31/2023	Time	1206
Description	Exposed waste was observed on the south exterior wall of Cell 5W.						
							
Location	City of Little Rock Class 1			Permit	0266-S1	AFIN	60-01071
Photographer	Kim Davenport		<i>KD</i>	Witness	N/A		
Photo #	12	Of	14	Date	7/31/2023	Time	1119
Description	Exposed waste was observed in the active area of Cell 5W.						
							

Division of Environmental Quality Official Photograph Sheet

Location	City of Little Rock Class 1			Permit	0266-S1	AFIN	60-01071
Photographer	Kim Davenport		<i>KD</i>	Witness	N/A		
Photo #	13	Of	14	Date	7/31/2023	Time	1203
Description	Vegetation was observed growing through the sand layer of Cell 5W at the unused south end.						



Location	City of Little Rock Class 1			Permit	0266-S1	AFIN	60-01071
Photographer	Kim Davenport		<i>KD</i>	Witness	N/A		
Photo #	14	Of	14	Date	7/31/2023	Time	1037
Description	Partially buried waste was observed in the truck cleanout area, which is off the lined landfill.						

