

December 29, 2023

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

Re: 4Q Inspection conducted on November 13, 2023

AFIN 60-01071

Permit Number 0266-S1

Dear Mr. Jackson:

In response to your inspection of November 13, 2023, the following is a list of comments and corrective actions to be undertaken on the City of Little Rock's Class 1 Violations:

AFIN 60-01071 Permit Number 0266-S1,

- **Category 2, Regulation 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 An OP (Doc #60665) was submitted in 2011 but has never been Approved and is now also out of date.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, email sent on August 14, 2023 to request approval but no letter from DEQ stating that the request was approved. (Refer to Photos #12 and #13.)* The City is currently updating the operating plan to revise the description of the facility. The City has also completed a design to rehabilitate the facility and hopefully will be constructing the improvements soon. I will provide the drafts for all Operating plans. The City has approved for the Landfill to purchase dirt for 2024 budget to resolve these intermediate cover issues on Cell 9.
- **Category 2, Regulation 411(g): Litter Control Provisions Maintained.** *Litter was observed entering and surrounding the unlined storm water collection area, located northwest of Cell 5, and in the unused south portion of Cell 5W. (Refer to Photos #5 - #7.) Litter was also observed on the west side of Cell 2 and on the south side of Cell 4. (Refer to Photos #8 and #9.)* The City had the litter picked up and litter fence will be readjusted to prevent this from occurring. The plan is to also stop traffic and closed off that entrance near that pond.
- **Category 2, Regulation 427(b). Surface Water Control.** *Run-off (leachate) was observed running from the active portion of the landfill on the west side of Cell 5, across an access road to the storm water ditch, and down to the storm water pond. (Refer to Photos #1 - #7.)* The City

has corrected the road entrance will be closed off and fenced off going forward. We located the source and corrected the issue pictures will be added in reference to (Photos #1-#7)

- **Category 2, Regulation 418(b): Run-off Control System Present and Adequate.** *Run-off (leachate) from the active portion of the landfill was not being handled in accordance with Reg.22.419 and Reg.22.429. (Refer to Photos#1- #7.)*

The City has corrected this locating the source and stopping this flow pictures will be added in reference to (Photos#1- #7)

- **Category 2, Regulation 411(i): Adequate Maintenance of Intermediate/Final Cover Vegetation.** *Woody vegetation was observed on the west side of Cell 2 in the lined area. (Refer to Photo #8.) No final vegetative cover was observed on Cells 1 and Cell 2. (Refer to Photos #12 and #13.)* The City has approved for dirt purchase for intermediate cover for 2024 to resolve this issue. We are currently working on Cell 4 final cover project trying to establish vegetation. The City plans to Hydro Seed Cells #1 and #2 after this Cell 4 project to establish vegetation.
- **Category 3, Regulation 413(b): Satisfactory Alternate Cover Materials.** *Solid waste was observed in the active portion of the landfill without enough alternate daily cover material to sufficiently cover the waste. (Refer to Photos #10 and #11.)* The City has addressed this matter since then and have pictures to refer to (Photos #10 and #11.)
- **Category 3, Regulation 411(o): Erosion or Other Cover Defects Resulting in Exposed Refuse.** *Erosion rills and exposed waste was observed on Cell 1 and Cell 2. (Refer to Photos #12 and #13.)* The City has approved to purchase dirt for covering this area for intermediate cover to prevent erosion and we plan on Hydro Seeding these Cells to start vegetation after Cell 4 final cover project. The Erosion will be covered in the meanwhile.

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

Sincerely,



Bernard Owens
City of Little Rock
Solid Waste Services Manager