



DIVISION OF
ENVIRONMENTAL QUALITY

128435

Sarah Huckabee Sanders
GOVERNOR

Shane E. Khoury
SECRETARY

11/30/2023

Mr. Bernard Owens
Solid Waste Service Manager
10803 Ironton Cutoff Road
City of Little Rock Disposal Facility
Little Rock, AR 72206

RE: Inspection conducted on November 13, 2023
AFIN 60-01071
Permit Number 0266-S1

Dear Mr. Owens,

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 Casey Jackson. 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) 682-0832 or casey.jackson@adeq.state.ar.us.

Sincerely,

A handwritten signature in cursive script that reads "Casey J. Jackson".

Casey Jackson
Solid Waste Inspector

cc: Nicholas Jones P.E., Senior Operations Manager, Office of Land Resources

**Division of Environmental Quality
Office of Land Resources
Class 1 Landfill Inspection Form**

Site Name	City of Little Rock	County	Pulaski	AFIN	60-01071
Facility Address	10801 Ironton Cut-Off Rd. Little Rock, AR	Phone #	501-888-4493	Permit #	0266-S1
Permittee Address	10801 Ironton Cut-Off Rd. Little Rock, AR	Email Address	ncharles@littlerock.gov	PDS #	128435
Date	11/13/2023	Entry Time	12:40	Exit Time	13:35

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, 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.)
	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 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.)
X	427(b)	Surface Water Controls	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 stormwater pond. (Refer to Photos #1 - #7.)
	411(h)(1)	Contouring Prevents Surface Water Flowing Into or Through Waste	
X	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.)
	411(h)(2)	Surface Water Control Prevents Off-site Sediment Accumulation	
X	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.)
	415	Gas Monitoring Program	
	411(o)	Leachate Leaks or Evidence of Leachate Seepage	
	429	Leachate Collection System	


Category 3

	Regulation	Item Description	Comments
X	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.)

	419(a)(5)	Cause Discharge/Leachate Leaving Landfill	
	411(f)(3)	Depositing Waste in Standing Water Prohibited	
X	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.)
	309(c)	Overfill/Off Lined Area	

Records

Date of Last Annual Report	3/30/2023	Date of Last Quarterly Methane Monitoring	8/18/2023
Date of Last Groundwater Monitoring Report	8/4/2023	Previous Quarter Waste Received	40,720.45

Operator Name & Number	Samuel B. Owens - 004434	Signature of Inspector	
Exit Interview Conducted with	Samuel B. Owens	Method	On-Site
		Date	11/13/2023
		Time	13:30

Division of Environmental Quality Official Photograph Sheet


Location	City of Little Rock Class 1			Permit	0266-S1	AFIN	60-01071
Photographer	Casey Jackson		CJS	Witness	Ryan Hayden		
Photo #	1	Of	13	Date	11/13/2023	Time	12:45
Description	Run-off (leachate) was observed running off of the lined area on the west side of Cell 5.						





Location	City of Little Rock Class 1			Permit	0266-S1	AFIN	60-01071
Photographer	Casey Jackson		CJS	Witness	Ryan Hayden		
Photo #	2	Of	13	Date	11/13/2023	Time	12:45
Description	Run-off (leachate) was observed running off of the lined area on the west side of Cell 5.						



Division of Environmental Quality Official Photograph Sheet

Location	City of Little Rock Class 1			Permit	0266-S1	AFIN	60-01071
Photographer	Casey Jackson		CJJ	Witness	Ryan Hayden		
Photo #	3	Of	13	Date	11/13/2023	Time	12:46
Description	The leachate observed in Photos #1 & #2 flow over the access road and into the stormwater ditch on the opposite side of the road.						
							
Location	City of Little Rock Class 1			Permit	0266-S1	AFIN	60-01071
Photographer	Casey Jackson		CJJ	Witness	Ryan Hayden		
Photo #	4	Of	13	Date	11/13/2023	Time	12:47
Description	Another view of the leachate observed in Photos #1 - #3 flowing over the access road.						
							

Division of Environmental Quality Official Photograph Sheet

Location	City of Little Rock Class 1			Permit	0266-S1	AFIN	60-01071
Photographer	Casey Jackson		CJJ	Witness	Ryan Hayden		
Photo #	5	Of	13	Date	11/13/2023	Time	12:48
Description	Litter was observed in the storm water drainage ditch, west of Cell 5. This is also the continued path of the leachate flow previously described in Photos #1 - #4.						
							
Location	City of Little Rock Class 1			Permit	0266-S1	AFIN	60-01071
Photographer	Casey Jackson		CJJ	Witness	Ryan Hayden		
Photo #	6	Of	13	Date	11/13/2023	Time	12:49
Description	Another view of the litter and leachate flow observed in Photos #1 - #5.						
							

Division of Environmental Quality Official Photograph Sheet

Location	City of Little Rock Class 1	Permit	0266-S1	AFIN	60-01071
Photographer	Casey Jackson	CJJ	Witness Ryan Hayden		
Photo #	7	Of	13	Date	11/13/2023
Description	The stormwater pond is observed in the background. The litter and leachate flow described in Photos #1 - #6 was observed entering the stormwater pond.				



Location	City of Little Rock Class 1	Permit	0266-S1	AFIN	60-01071
Photographer	Casey Jackson	CJJ	Witness Ryan Hayden		
Photo #	8	Of	13	Date	11/13/2023
Description	Woody vegetation was observed on the west side of Cell 2, in the lined area. The marker (red arrow) in the center of the photo indicates the end of the liner. Woody vegetation to the right of the marker is in the lined area. Litter was also observed on both sides of the marker.				



Division of Environmental Quality Official Photograph Sheet

Location	City of Little Rock Class 1			Permit	0266-S1	AFIN	60-01071
Photographer	Casey Jackson		CJJ	Witness	Ryan Hayden		
Photo #	9	Of	13	Date	11/13/2023	Time	12:52
Description	Litter was observed on the side of road on the south side of Cell 4.						



Location	City of Little Rock Class 1			Permit	0266-S1	AFIN	60-01071
Photographer	Casey Jackson		CJJ	Witness	Ryan Hayden		
Photo #	10	Of	13	Date	11/13/2023	Time	12:53
Description	Solid waste was observed in the active portion of the landfill without enough alternate daily cover material to sufficiently cover the waste.						



Division of Environmental Quality Official Photograph Sheet

Location	City of Little Rock Class 1			Permit	0266-S1	AFIN	60-01071
Photographer	Casey Jackson		CJJ	Witness	Ryan Hayden		
Photo #	11	Of	13	Date	11/13/2023	Time	12:55
Description	Solid waste was observed in the active portion of the landfill without enough alternate daily cover material to sufficiently cover the waste.						



Location	City of Little Rock Class 1			Permit	0266-S1	AFIN	60-01071
Photographer	Casey Jackson		CJJ	Witness	Ryan Hayden		
Photo #	12	Of	13	Date	11/13/2023	Time	12:55
Description	Erosion rills and piles of unauthorized alternate cover were observed staged on the north side of Cell 1. No final vegetative cover observed.						



Division of Environmental Quality Official Photograph Sheet

Location	City of Little Rock Class 1			Permit	0266-S1	AFIN	60-01071
Photographer	Casey Jackson			Witness	Ryan Hayden		
Photo #	13	Of	13	Date	11/13/2023	Time	12:56
Description	Erosion rills and exposed waste was observed on the north side of Cell 2. Staged piles of unauthorized alternate cover material can be seen in the background. No final vegetative cover observed.						
