

February 1, 2024

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

**RE: Inspection conducted on January 2, 2024**  
**AFIN 60-01071**  
**Permit Number 0266-S1**

Dear Mr. Jackson:

In response to your inspection of January 2, 2024, 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 An OP (Doc #60665) was submitted in 2011 but has never been Approved and is now also out of date.* – The City has a contract to complete this. 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 have sent draft Operating plans to Casey and will send the draft plans to Michael Marchman for his approval. The City has approved for the Landfill to purchase dirt for 2024 budget to resolve these intermediate cover issues on Cell 9. We are having to go back to the board to revise the dirt request.
- **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 #1 & #2.) Litter was also observed along the road on the south side of Cell 4 & 5. (Refer to Photo #8.)* - 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 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 #5 - #7.) - This is another reason we are going back to the board to revise the dirt request. We are using our alternate cover but we need more dirt for the end of the week. This will be addressed.*

- ***Category 3, Regulation 411(o): Erosion or Other Cover Defects Resulting in Exposed Refuse.*** *Erosion rills and exposed waste was observed on southwest corner of Cell 4. (Refer to Photos#3 & #4.) - 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



