



DIVISION OF
ENVIRONMENTAL QUALITY

128793

Sarah Huckabee Sanders
GOVERNOR

Shane E. Khoury
SECRETARY

1/9/2024

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 January 2, 2024
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 black ink 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 # | 501-888-6751 | Permit # | 0266-S1 |
| Permittee Address | 10801 Ironton Cut-Off Rd. Little Rock, AR | Email Address | sowens@littlerock.gov | PDS # | 128793 |
| Date | 1-2-2024 | Entry Time | 10:20 | Exit Time | 12:30 |

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. |
| | 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 #1 & #2.) Litter was also observed along the road on the south side of Cell 4 & 5. (Refer to Photo #8.) |
| | 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 | |
| X | 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 |
|---|-------------------|--|--|
| 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 #5 - #7.) |
| | 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 southwest corner of Cell 4. (Refer to Photos #3 & #4.) |
| | 309(c) | Overfill/Off Lined Area | |
| | | | |

Records

| | | | | | | | |
|---|--------------------------|--|---|-------------|----------|-------------|------|
| Date of Last Annual Report | 3/30/2023 | Date of Last Quarterly Methane Monitoring | 9/29/2023 | | | | |
| Date of Last Groundwater Monitoring Report | 8/4/2023 | Previous Quarter Waste Received | 41,052.70 | | | | |
| Operator Name & Number | Samuel B. Owens - 004434 | Signature of Inspector |  | | | | |
| Exit Interview Conducted with | Samuel B. Owens | Method | On-Site | Date | 1-2-2024 | Time | 1215 |

Division of Environmental Quality Official Photograph Sheet


| | | | | | | | |
|---------------------|--|-----------|------------|----------------|----------|-------------|----------|
| Location | City of Little Rock Class 1 | | | Permit | 0226-S1 | AFIN | 60-01071 |
| Photographer | Casey Jackson | | <i>CSS</i> | Witness | | | |
| Photo # | 1 | Of | 8 | Date | 1/2/2024 | Time | 11:11 |
| Description | Litter was observed in the storm water drainage ditch. | | | | | | |



| | | | | | | | |
|---------------------|---|-----------|------------|----------------|----------|-------------|----------|
| Location | City of Little Rock Class 1 | | | Permit | 0226-S1 | AFIN | 60-01071 |
| Photographer | Casey Jackson | | <i>CSS</i> | Witness | | | |
| Photo # | 2 | Of | 8 | Date | 1/2/2024 | Time | 11:13 |
| Description | Another view of litter observed in the stormwater drainage ditch. | | | | | | |





Division of Environmental Quality Official Photograph Sheet

| | | | | | | | |
|--|--|-----------|------------|----------------|----------|-------------|----------|
| Location | City of Little Rock Class 1 | | | Permit | 0226-S1 | AFIN | 60-01071 |
| Photographer | Casey Jackson | | <i>CSS</i> | Witness | | | |
| Photo # | 3 | Of | 8 | Date | 1/2/2024 | Time | 11:19 |
| Description | Erosion rill and exposed waste on the southwest corner of Cell 4. | | | | | | |
|  | | | | | | | |
| Location | City of Little Rock Class 1 | | | Permit | 0226-S1 | AFIN | 60-01071 |
| Photographer | Casey Jackson | | <i>CSS</i> | Witness | | | |
| Photo # | 4 | Of | 8 | Date | 1/2/2024 | Time | 11:22 |
| Description | Another view erosion rill and exposed waste on the southwest corner of Cell 4. | | | | | | |
|  | | | | | | | |

Division of Environmental Quality Official Photograph Sheet

| | | | | | | | |
|--|--|-----------|-----|----------------|----------|-------------|----------|
| Location | City of Little Rock Class 1 | | | Permit | 0226-S1 | AFIN | 60-01071 |
| Photographer | Casey Jackson | | CJJ | Witness | | | |
| Photo # | 5 | Of | 8 | Date | 1/2/2024 | Time | 11:19 |
| Description | Solid waste was observed on the east slope of Cell 4 and action portion of the landfill without enough alternate daily cover material to sufficiently cover the waste. | | | | | | |
|  | | | | | | | |
| Location | City of Little Rock Class 1 | | | Permit | 0226-S1 | AFIN | 60-01071 |
| Photographer | Casey Jackson | | CJJ | Witness | | | |
| Photo # | 6 | Of | 8 | Date | 1/2/2024 | Time | 11:19 |
| 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 | 0226-S1 | AFIN | 60-01071 |
| Photographer | Casey Jackson | | <i>CSS</i> | Witness | | | |
| Photo # | 7 | Of | 8 | Date | 1/2/2024 | Time | 11:19 |
| 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 | 0226-S1 | AFIN | 60-01071 |
| Photographer | Casey Jackson | | <i>CSS</i> | Witness | | | |
| Photo # | 8 | Of | 8 | Date | 1/2/2024 | Time | 11:24 |
| Description | Solid waste (blown litter) was observed off the lined area along the road way, south of Cell 4 and 5. | | | | | | |
|  | | | | | | | |