



DIVISION OF  
ENVIRONMENTAL QUALITY

130593

Sarah Huckabee Sanders  
GOVERNOR

Shane E. Khoury  
SECRETARY

6/18/2024

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 May 7, 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](mailto:casey.jackson@adeq.state.ar.us).

Sincerely,

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

Casey Jackson  
Solid Waste Inspector

cc: Ryan Hayden, Senior Compliance Manager, Office of Land Resources

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

<b>Site Name</b>	City of Little Rock	<b>County</b>	Pulaski	<b>AFIN</b>	60-01071
<b>Facility Address</b>	10801 Ironton Cut-Off Rd. Little Rock, AR	<b>Phone #</b>	501-888-6751	<b>Permit #</b>	0266-S1
<b>Permittee Address</b>	10801 Ironton Cut-Off Rd. Little Rock, AR	<b>Email Address</b>	sowens@littlerock.gov	<b>PDS #</b>	130593
<b>Date</b>	5/7/2024 5/30/2024	<b>Entry Time</b>	1330 1040	<b>Exit Time</b>	1530 1105

**Operational Standards**

**Category 1**

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


**Category 2**

	<b>Regulation</b>	<b>Item Description</b>	<b>Comments</b>
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)
	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 in the storm water collection ditch, located west of Cell 5w. (Refer to Photos #3 - #4.)
	427(a)(b)(d)	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	
X	411(o)	Leachate Leaks or Evidence of Leachate Seepage	Leachate was observed on the west side of Cell 5w. (Refer to Photos # 1 - #2 & #9).
	429	Leachate Collection System	
	427(e)	Active portion run-off	



**Category 3**

	<b>Regulation</b>	<b>Item Description</b>	<b>Comments</b>
X	413(a)(b)(c)	Satisfactory Daily/Alternate/Intermediate Cover	Exposed solid waste was observed in the south portion of cell 5W, where ADC had been utilized. (Refer to Photos #5 - #8).
	419(a)(5)	Cause Discharge/Leachate Leaving Landfill	
	411(f)(3)	Depositing Waste in Standing Water Prohibited	
	411(o)	Erosion or Other Cover Defects Resulting in Exposed Refuse	
	309(c)	Overfill/Off Lined Area	

**Records**

<b>Date of Last Annual Report</b>	3/29/2024	<b>Date of Last Quarterly Methane Monitoring</b>	9/29/2023		
<b>Date of Last Groundwater Monitoring Report</b>	12/1/2023	<b>Previous Quarter Waste Received</b>	37,481.22 Tons		
<b>Operator Name &amp; Number</b>	Robert T. Lewis - 004578	<b>Signature of Inspector</b>			
<b>Exit Interview Conducted with</b>	Robert T. Lewis	<b>Method</b>	On-Site	<b>Date</b>	5/7/2024
				<b>Time</b>	1520

## Division of Environmental Quality Official Photograph Sheet

<b>Location</b>	City of Little Rock Class 1			<b>Permit</b>	0266-S1	<b>AFIN</b>	60-01071
<b>Photographer</b>	Casey Jackson		<i>CSS</i>	<b>Witness</b>	N/A		
<b>Photo #</b>	1	<b>Of</b>	10	<b>Date</b>	5/7/2024	<b>Time</b>	1347
<b>Description</b>	Leachate was observed on the west side of Cell 5. The view is from the west looking east.						
							
<b>Location</b>	City of Little Rock Class 1			<b>Permit</b>	0266-S1	<b>AFIN</b>	60-01071
<b>Photographer</b>	Casey Jackson		<i>CSS</i>	<b>Witness</b>	N/A		
<b>Photo #</b>	2	<b>Of</b>	10	<b>Date</b>	5/7/2024	<b>Time</b>	1352
<b>Description</b>	Leachate was observed on the west side of Cell 5. The view is from the east looking west.						
							

## Division of Environmental Quality Official Photograph Sheet

<b>Location</b>	City of Little Rock Class 1			<b>Permit</b>	0266-S1	<b>AFIN</b>	60-01071
<b>Photographer</b>	Casey Jackson		<i>CSS</i>	<b>Witness</b>	N/A		
<b>Photo #</b>	3	<b>Of</b>	10	<b>Date</b>	5/7/2024	<b>Time</b>	1344
<b>Description</b>	Litter and leachate were observed in the storm water drainage ditch, west of Cell 5. The view is from the southeast looking northwest.						
							
<b>Location</b>	City of Little Rock Class 1			<b>Permit</b>	0266-S1	<b>AFIN</b>	60-01071
<b>Photographer</b>	Casey Jackson		<i>CSS</i>	<b>Witness</b>	N/A		
<b>Photo #</b>	4	<b>Of</b>	10	<b>Date</b>	5/7/2024	<b>Time</b>	1345
<b>Description</b>	Another view of litter and leachate observed in the storm water drainage ditch, west of Cell 5 The view is from the northeast looking southwest.						
							

## Division of Environmental Quality Official Photograph Sheet

<b>Location</b>	City of Little Rock Class 1			<b>Permit</b>	0266-S1	<b>AFIN</b>	60-01071
<b>Photographer</b>	Casey Jackson		<i>CSS</i>	<b>Witness</b>	N/A		
<b>Photo #</b>	5	<b>Of</b>	10	<b>Date</b>	5/7/2024	<b>Time</b>	1354
<b>Description</b>	Exposed solid waste was observed in the active portion of the landfill (Cell 5W) where ADC was used. The view is from the north looking south.						




<b>Location</b>	City of Little Rock Class 1			<b>Permit</b>	0266-S1	<b>AFIN</b>	60-01071
<b>Photographer</b>	Casey Jackson		<i>CSS</i>	<b>Witness</b>	N/A		
<b>Photo #</b>	6	<b>Of</b>	10	<b>Date</b>	5/7/2024	<b>Time</b>	1354
<b>Description</b>	Exposed solid waste was observed in the active portion of the landfill (Cell 5W) where ADC was used. The view is from the southwest looking northeast.						



## Division of Environmental Quality Official Photograph Sheet

<b>Location</b>	City of Little Rock Class 1			<b>Permit</b>	0266-S1	<b>AFIN</b>	60-01071
<b>Photographer</b>	Casey Jackson		CJS	<b>Witness</b>	N/A		
<b>Photo #</b>	7	<b>Of</b>	10	<b>Date</b>	5/7/2024	<b>Time</b>	1354
<b>Description</b>	Exposed solid waste was observed in the active portion of the landfill (Cell 5W) where ADC was used. Leachate was observed pooling in the active area. The view is from the southwest looking northeast.						
							
<b>Location</b>	City of Little Rock Class 1			<b>Permit</b>	0266-S1	<b>AFIN</b>	60-01071
<b>Photographer</b>	Casey Jackson		CJS	<b>Witness</b>	N/A		
<b>Photo #</b>	8	<b>Of</b>	10	<b>Date</b>	5/7/2024	<b>Time</b>	1353
<b>Description</b>	Exposed solid waste was observed in the active portion of the landfill (Cell 5W) where ADC was used. Leachate was observed pooling in the active area. The view is from the south looking north.						
							

## Division of Environmental Quality Official Photograph Sheet

<b>Location</b>	City of Little Rock Class 1			<b>Permit</b>	0266-S1	<b>AFIN</b>	60-01071
<b>Photographer</b>	Casey Jackson		<i>CSS</i>	<b>Witness</b>	N/A		
<b>Photo #</b>	9	<b>Of</b>	10	<b>Date</b>	5/7/2024	<b>Time</b>	1410
<b>Description</b>	Leachate was observed on the north side of Cell 2. The view is from the north looking south.						
							
<b>Location</b>	City of Little Rock Class 1			<b>Permit</b>	0266-S1	<b>AFIN</b>	60-01071
<b>Photographer</b>	Casey Jackson		<i>CSS</i>	<b>Witness</b>	N/A		
<b>Photo #</b>	10	<b>Of</b>	10	<b>Date</b>	5/30/2024	<b>Time</b>	1052
<b>Description</b>	View of temporary MRF operations observed in the northeast corner off the lined area, outside of the approved timeline per Doc #83935. This view is from the northeast side looking southwest.						
