From: Owens, Bernard <sowens@littlerock.gov>
Sent: Wednesday, July 10, 2024 5:35 PM
To: Casey Jackson
Cc: Kimberly Davenport (adpce.ad); Michael Marchman (adpce.ad)
Subject: May 7, 2024 Inspection responses
Attachments: 2023-02-28 DRAFT CLR Class 4 Landfill Operating Plan.pdf; 7-10-2024 ADEQ 2Q inspection response.docx

Importance: High

Follow Up Flag: Follow up
Flag Status: Flagged

Good Afternoon Casey,

Here is the response for One of the 2Q Inspection violations along with the Class 4 Op plan draft.

Bernard Owens
Solid Waste Services Manager
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ftn Associates Ltd.
water resources / environmental consultants

OPERATING PLAN
CITY OF LITTLE ROCK CLASS 4 LANDFILL
LITTLE ROCK, ARKANSAS
PERMIT NO. 0266-S4J
AFIN: 60-01071

FEBRUARY 28, 2023

OPERATING PLAN
CITY OF LITTLE ROCK CLASS 4 LANDFILL
LITTLE ROCK, ARKANSAS
PERMIT NO. 0266-S4J
AFIN: 60-01071

Prepared for

City of Little Rock
10803 Ironton Cutoff
Little Rock, AR 72206

Prepared by

FTN Associates, Ltd.
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Little Rock, AR 72211

FTN No. 04010-2808-001

February 28, 2023

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1.0 INTRODUCTION

1.1 General Information

1.1.1 Site Background

This Operating Plan provides operating and maintenance procedures for the City of Little Rock (CLR) Class 4 Landfill (the Landfill). The CLR Solid Waste Facility is a multi-purpose site including a 110-acre Class 1 Landfill, a 17.6-acre Class 4 Landfill, and a 20-acre Yard Waste Compost Facility. The facility is located in Pulaski County at 10803 Ironton Cutoff Road, about 0.5 miles south of the intersection of Arkansas Highways 338 (Dixon Road) and 367 (Arch Street). The location of the facility is shown on Figure 1.1. Local natural topography generally consists of relatively flat to rolling terrain. Portions of the site have previously been used for residential, industrial, commercial, mining, and agricultural purposes. The surrounding land use is varied, including residential, mining, and closed CLR Class 1 and Class 4 landfills.

The CLR is the owner and operator of the solid waste facility.

The Landfill was originally permitted in April 1993 and is still operated under the original permit. The Class 4 Landfill is located as shown on Figure 1.2. As of January 2023, waste had been placed in Cells 1, 2 and 3, with remaining permitted capacity in Cell 3. Cell 4 has not been constructed.

1.1.2 Purpose

This plan has been prepared to update information related to operational or regulatory changes to the Class 4 Landfill since the previous plan was written (1996). The previous plan described operations at both the Class 1 and Class 4 landfills. Changes that have been incorporated comply with the updated Arkansas Pollution Control and Ecology Commission (APCEC) Rule No. 22 (Rule No. 22) (April 2008). This manual directs the operation of the landfill facility in accordance with required permits and regulations.

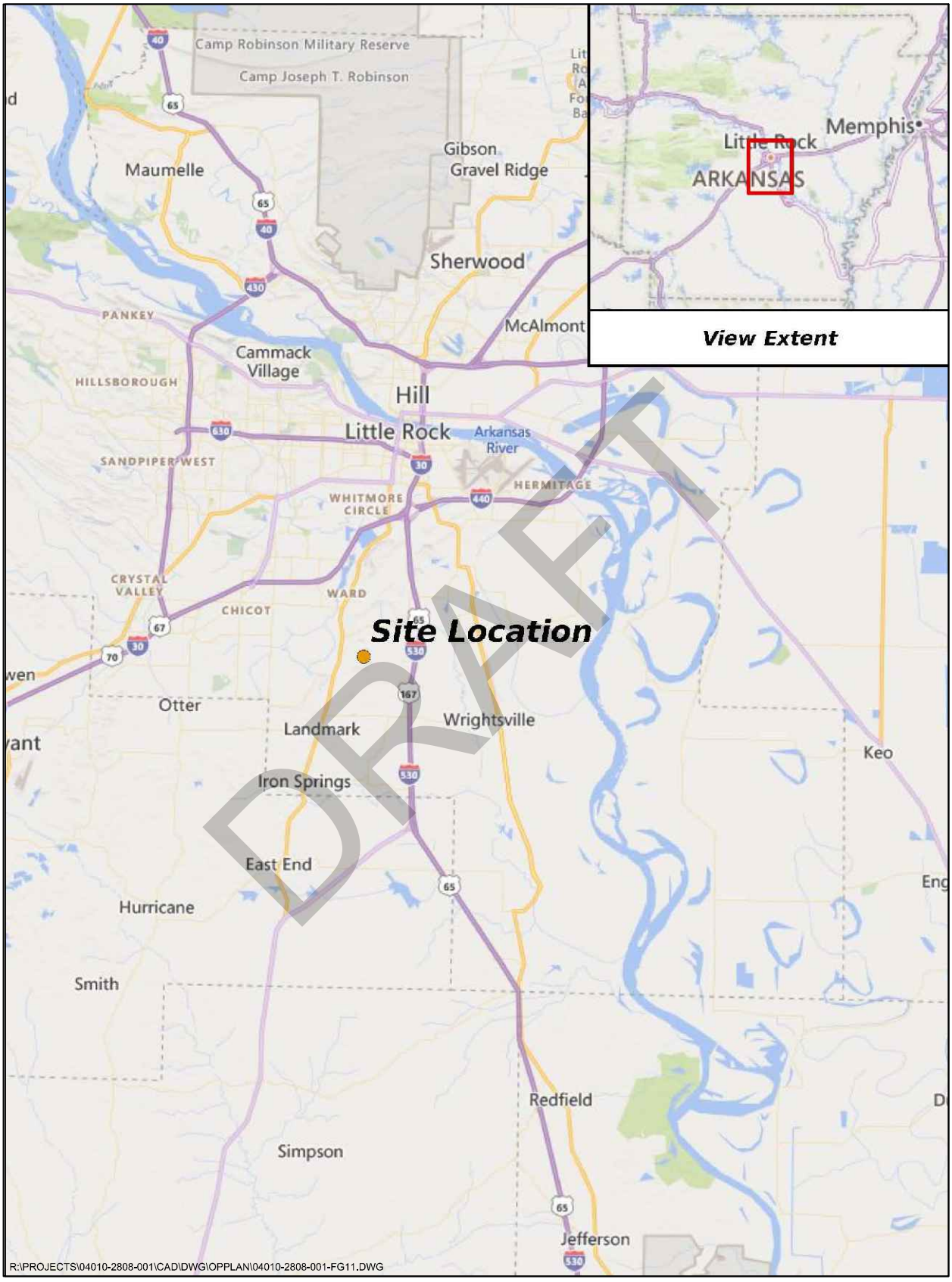


Figure 1.1. Site location map.

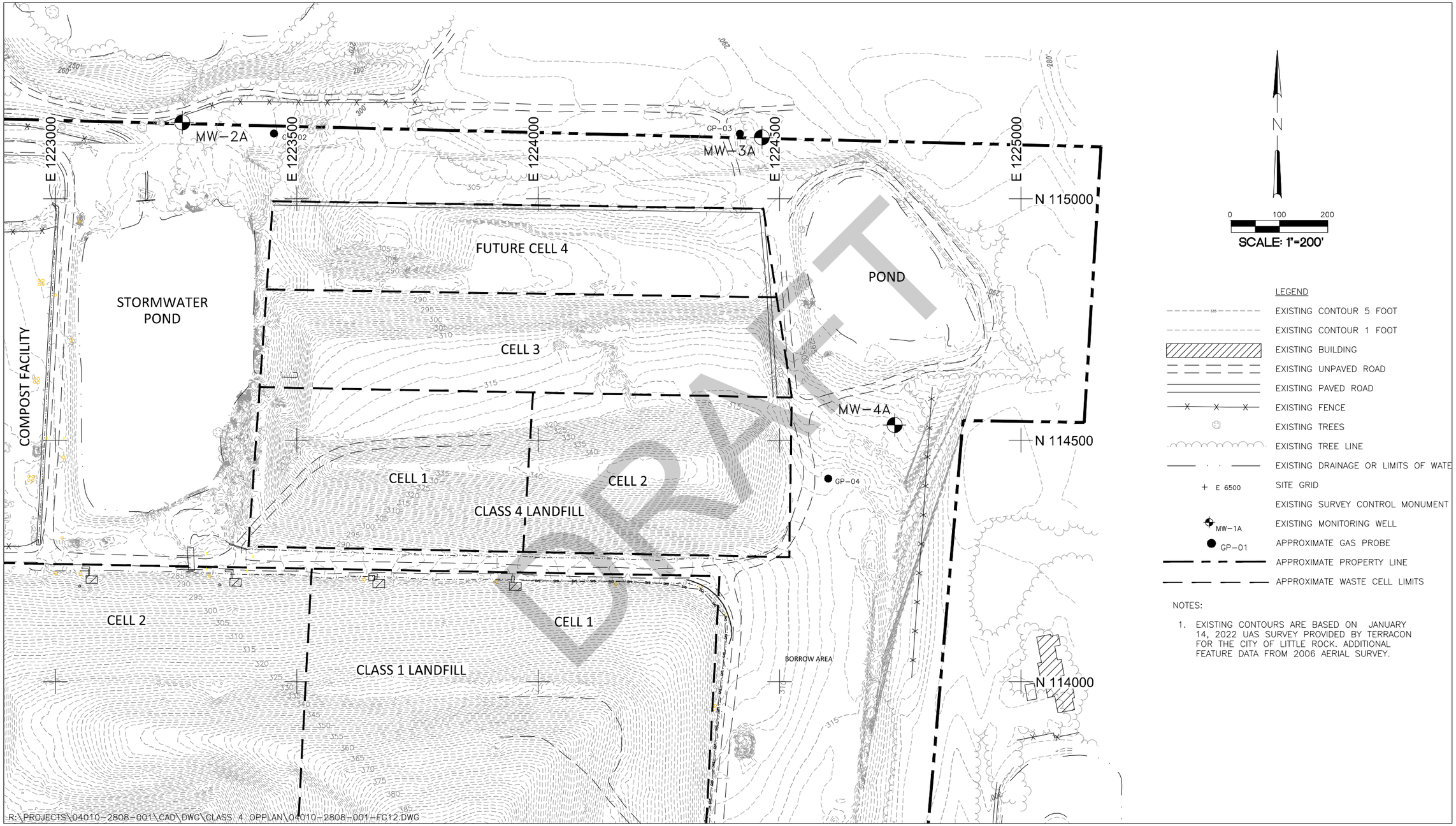


Figure 1.2. Existing Conditions.

1.1.3 Scope

This document has been prepared to assist all who have a part in the operation and maintenance of the landfill facility. This document includes procedures for the following:

1. Site development,
2. Waste disposal,
3. Inspection and maintenance,
4. Health and safety,
5. Emergency response and contingency action,
6. Administrative requirements,
7. Landfill closure, and
8. Landfill post-closure.

This document is divided into 8 sections. A brief description of these sections is provided below.

1. Section 1.0 – Introduction: provides general information regarding the landfill facility and this document.
2. Section 2.0 – General Operating Requirements: provides operating information for the landfill facility such as landfill equipment and personnel requirements, hours of operation and signage, access control, waste screening procedures, prohibited activities, and survey control.
3. Section 3.0 – Landfill Operating Procedures: provides an explanation of the operating and maintenance procedures specifically related to the landfill area.
4. Section 4.0 – Stormwater Management Procedures: provides an explanation of the operating and maintenance procedures for the stormwater management system of the landfill area.
5. Section 5.0 – Drop Box Facility: provides a brief description of the area designated for self-haulers to unload wastes.
6. Section 6.0 – Inspection and Maintenance: explains the methods for conducting periodic inspections of the various facilities associated with the Landfill.
7. Section 7.0 – Health and Safety: describes possible health-related hazards, abatement procedures, and emergency response procedures.
8. Section 8.0 – Recordkeeping and Reporting: provides an explanation of the facility permanent operating record (POR) system and reporting procedures.

1.1.4 Relationship to Other Facility Documents

This document will guide the operation and maintenance of the landfill facility. It should be used in connection with the following supporting documents to ensure efficient and effective operation of the solid waste facility (all documents shall be the most current, unless a date is specifically listed):

1. Title 40 Code of Federal Regulations (CFR) Part 258 (Subtitle D);
2. APCEC Rule No. 22 – Solid Waste Management;
3. Little Rock Emergency Operations Plan, Integrated Emergency Management System;
4. CLR Safety Manual; and
5. Hazardous Waste Exclusion and Special Waste Management Program.

This document will be updated over time to reflect current operations and regulations. Revisions to this document shall be submitted to the Arkansas Department of Energy and Environment, Division of Environmental Quality (DEQ) for review and approval. DEQ may require that the changes be accomplished through permit modification prior to implementation. All applicable requests, approvals, and other correspondence will be maintained in the facility POR.

1.1.5 Operating Permit

The CLR was issued an operating permit (Permit No. 0266-S) by DEQ in April 1993 to construct and operate a Class 1 and a Class 4 landfill. The Class 4 Landfill now operates under Permit No. 0266-S4J, with the "J" denoting that it operates under a permit that was originally issued as a joint permit for both landfills. A copy of the current permit is included in Appendix A.

1.2 Facility Description and Design

The Class 4 Landfill has been designed for the disposal of nonhazardous bulky, inert, non-putrescible solid wastes that do not degrade, or degrade very slowly, as defined in Rule No. 22. The design of the disposal facility was developed to comply with Rule No. 22 standards for Class 4 landfills. The following sections outline the design of the landfill.

1.2.1 Administration Building and Scale House

The Administration Building and Scale House are located as shown on Figure 1.2. All vehicles entering the site are stopped at the Scale House for site control, weighing, and billing. The Scale House is equipped with an entrance scale and an exit scale. The computerized scale system allows the CLR to accurately monitor the quantities of the various types of wastes entering the facility.

1.2.2 Waste Disposal Area

The landfill design includes four operating cells (Figure 1.2) and has a permitted volume, including waste and earthen cover, of 1,217,800 cubic yards (cy). The permitted volume has been estimated to have an approximate waste capacity of 900,052 tons.

The disposal facility has been designed as an area-fill type of landfill. As shown on Figure 1.3, waste Cells 1 through 4 have been designed to have a minimum bottom slope of 1.0%. Figure 1.4, Development Plan, show the proposed remaining development for the Landfill.

The proposed top of final grade is approximately 395 ft National Geodetic Vertical Datum of 1929 (NGVD). The landfill side slopes have been designed to have a maximum grade of 33% (3:1). The final form of the Landfill will consist of a large mound approximately 90 to 100 ft above existing ground surface (Figure 1.5).

The Landfill has been designed to include a bottom liner system and a final cover system. The landfill design does not include a leachate collection system. The bottom liner system consists of an 18-inch thick compacted clay layer with a maximum hydraulic conductivity of 5×10^{-7} cm/sec. The final cover system includes a 24-inch minimum thickness compacted barrier layer with a maximum hydraulic conductivity of 1×10^{-6} cm/sec and a 6-inch thick vegetated erosion layer.

Operating procedures for the Landfill are described in detail in Section 3.0 of this document.

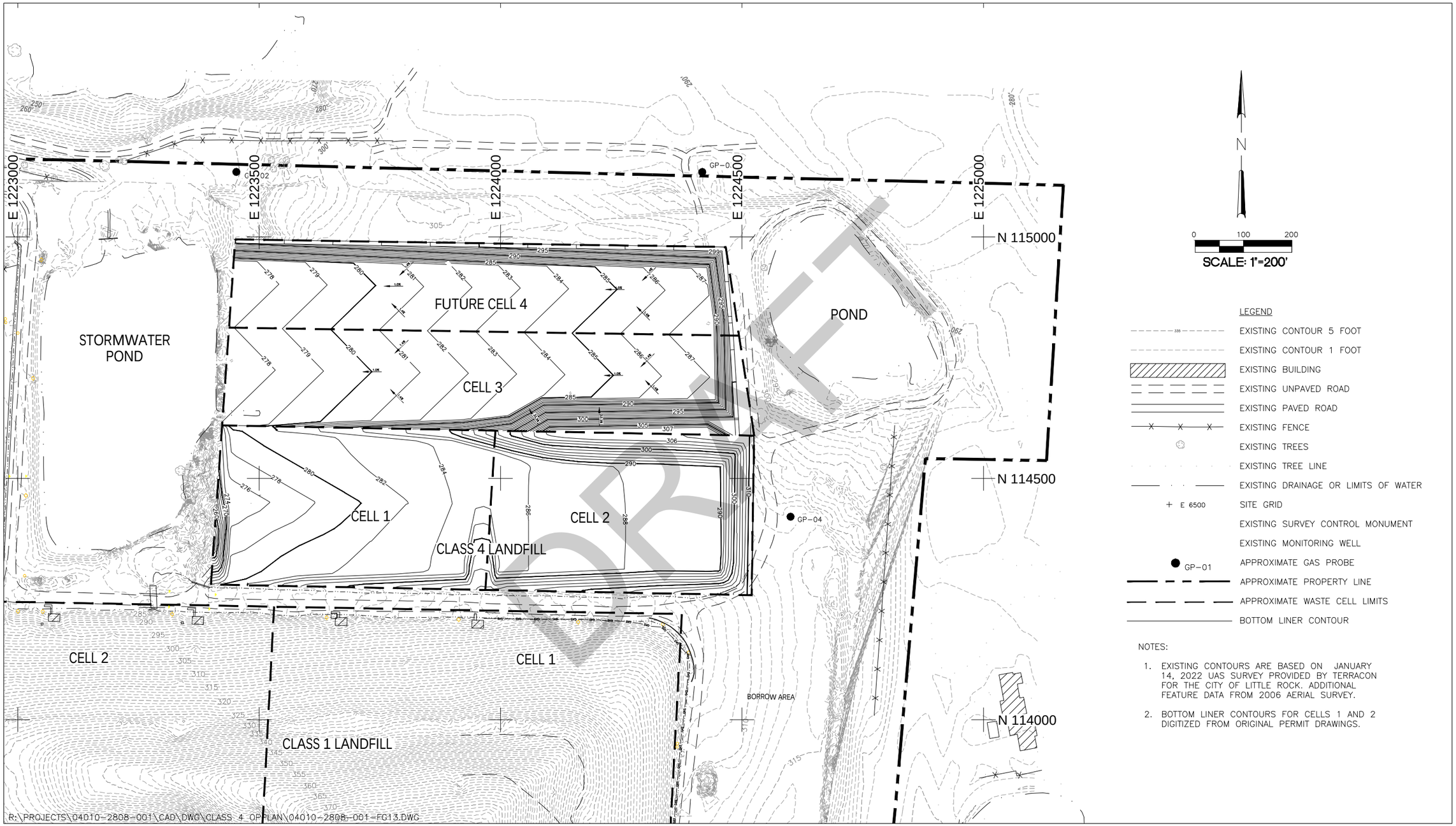


Figure 1.3. Bottom Liner Plan.

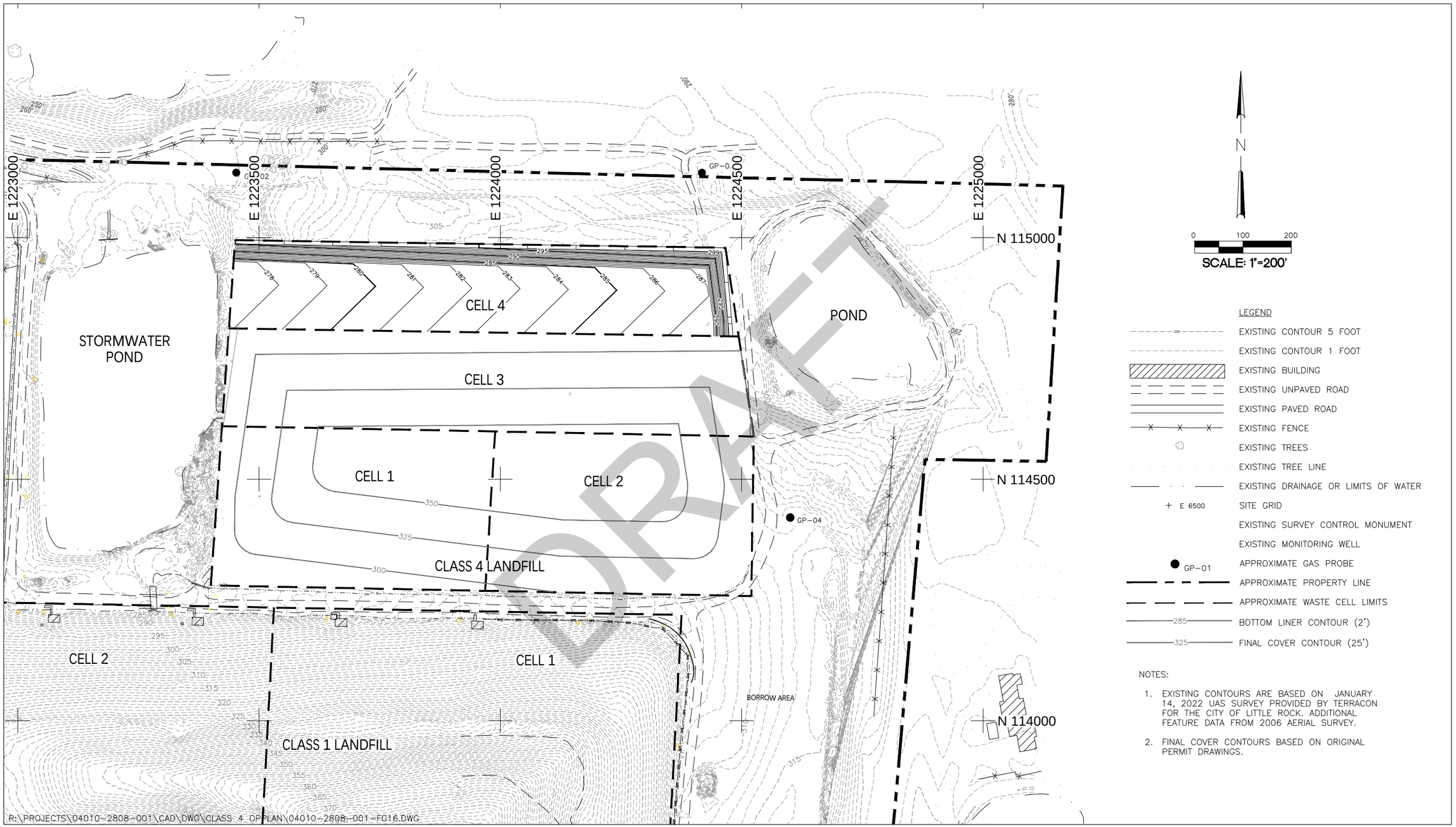


Figure 1.4. Development Plan.

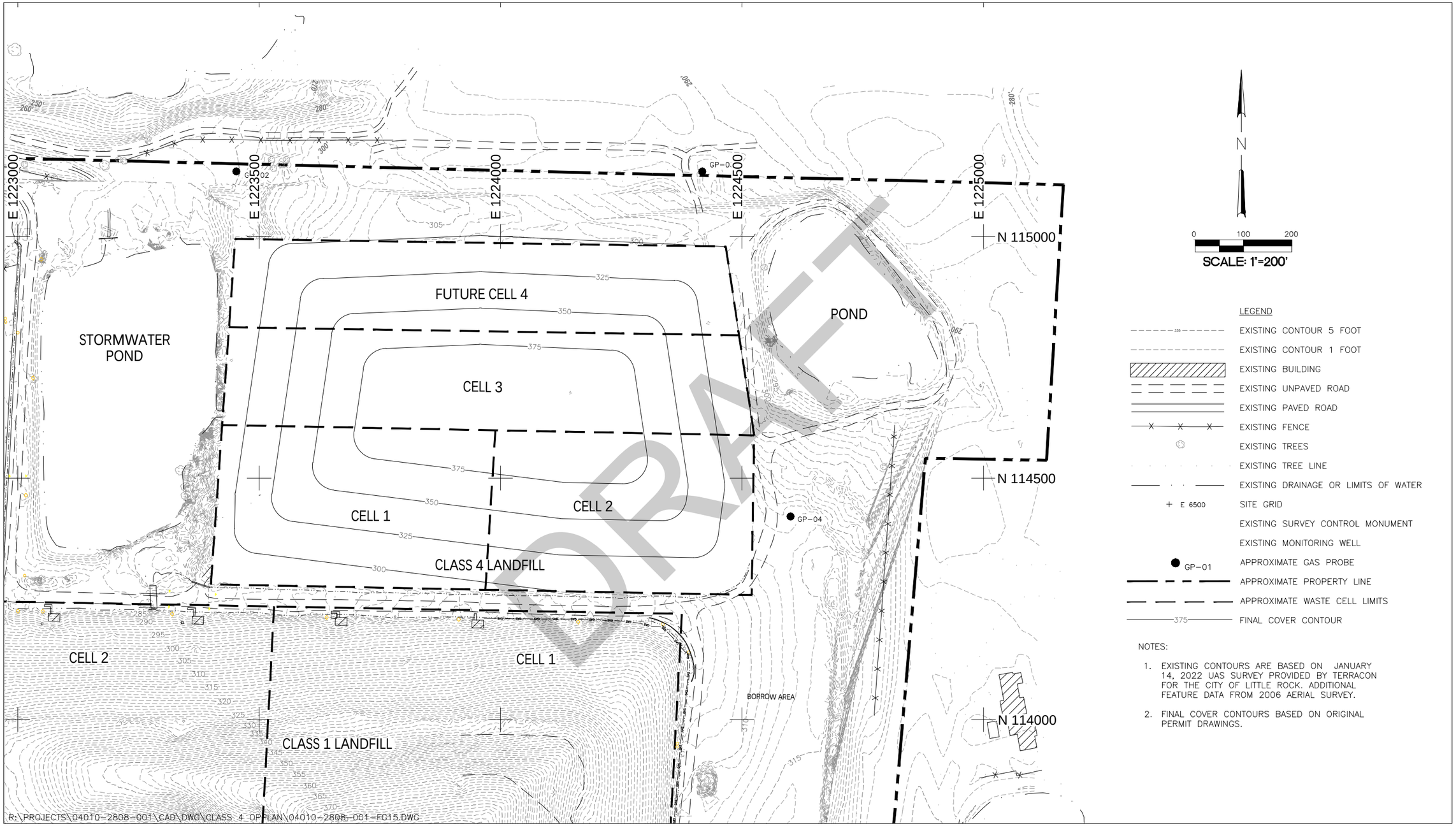


Figure 1.5. Final Cover Plan.

1.2.3 Stormwater Management System

Stormwater run-on and runoff within the landfill area will be directed away from the disposal facility by perimeter ditches that drain to the stormwater detention pond system prior to its release off site. Diversion berms, erosion control devices, and prompt seeding of the completed waste cells will reduce the potential of erosion on the finished side slopes.

Operating procedures for the stormwater management system are described in more detail in Section 4.0 of this document.

1.2.4 Drop Box Facility

The Drop Box Facility, located north of the Scale House (see Figure 1.2), consists of two 40-cubic yard roll-off containers placed below a retaining wall. Self-haulers, whose waste has been screened at the Scale House, are directed to dispose of Class 1, municipal solid waste (MSW), and Class 4 waste into the designated container for each type of waste.

Operating procedures for the Drop Box Facility are described in Section 5.0 of this document.

1.2.5 White Goods and Tires

White goods are disposed in the Class 1 landfill. Waste tires are not accepted at the facility. Instead, residents, businesses and haulers are directed to take waste tires to the authorized Pulaski County waste tire processor. Tires that are found in waste after disposal are collected in a designated area and are taken to the authorized Pulaski County waste tire processor.

2.0 GENERAL OPERATING REQUIREMENTS

The operating procedures in this section address the general operating requirements for the entire landfill facility. They are intended to serve as a reference and directive associated with efficient, effective operation and use of the waste disposal area.

Rule No. 22 contains information for the required minimum operational standards for all classifications of solid waste management facilities. The subsection of Chapter 6 (operational standards for Class 4 landfills) of Rule No. 22 is referenced where applicable.

2.1 General Operating Requirements (§22.607)

2.1.1 Conformance with Permit Documents (§22.607(a))

According to §22.607(a), all operations at the Landfill shall be in accordance with the permit, approved plans, the operating plan and narrative, and all other applicable regulations.

The CLR will conduct all operations at the landfill facility in accordance with this Operating Plan, the facility plans/specifications, the permit conditions, and the applicable requirements of Rule No. 22. Any permit conditions supersede stipulations detailed in the narrative, plans, and specifications.

2.1.2 Operator Licensing (§22.607(b))

This section of the regulation specifies that landfill operations shall be performed by a licensed onsite operator who has been certified in accordance with APCEC Rule No. 27.

Operations associated with daily landfill functions are performed under the direction of a licensed landfill operator. Licensing, training, and certification updates shall comply with the requirements of APCEC Rules Nos. 22 and 27. The following are the minimum licensing requirements for operation of the Class 4 landfill.

All Office Assistant II's are required to obtain a Class 1B Landfill Operator License within one year of employment.

All Equipment Operators are required to possess a valid Arkansas Class "A" or "B" Commercial Driver's License and to obtain a Class 1B Operator License within one year of employment.

The Scale House Operations Supervisor is required to obtain and keep a Class 1B Landfill Operator License within 2 years of employment.

The Landfill Supervisor is required to possess a valid Arkansas Class "A" or "B" Commercial Driver's License and to obtain a Class 1C Landfill Operator License within 2 years of employment.

The Solid Waste Engineer is required to obtain a Class 1C Landfill within 2 years of employment.

The Solid Waste Services Manager is required to obtain a Class 1C Landfill Operator or Class 1S Solid Waste Management License within 2 years of employment.

Copies of certifications are to be kept in the facility's POR that is located in the administrative offices of the CLR Solid Waste Facility.

2.1.3 Working Face Size (§22.607(c))

This section of the regulation specifies that active working face size shall be confined to the smallest practical area and that multiple working faces are not allowed unless specifically approved in the facility Operating Plan.

The working face will be operated in such a manner to minimize the open area. The average working face will be approximately 200 ft wide. See Figures 1.4 and 1.5 for more details of waste disposal progression.

2.1.4 Waste Spreading and Compacting (§22.607(d))

This section of Rule No. 22 specifies that as rapidly as solid waste is unloaded for disposal, it shall be spread and compacted in the smallest practical area and covered in accordance with the requirements of §22.609.

Waste at the facility will be spread and compacted after placement, and weekly interim cover is placed in accordance with the regulation.

2.1.5 Salvage Operations (§22.607(e))

This section of the regulation specifies that salvage operations may be approved by DEQ under the following conditions:

1. An area has been designated by the permittee for the recovery of salvageable material;
2. The operations do not interfere with or otherwise delay the activities of the work face;
3. The recovery of salvageable material must be conducted in an orderly manner; and
4. All salvaged materials are removed from the landfill site daily, or properly stored so that they do not create a nuisance or unsightly appearance.

No salvage operations are conducted at the working face or from trucks entering the facility.

2.1.6 Prohibited Activities (§22.607(f))

According to this section of the regulations, the following activities are prohibited in conjunction with or upon the site of a permitted landfill:

1. Any scavenging of materials as defined in Rule No. 22;
2. Any feeding of farm or domestic animals;
3. Depositing waste in standing water; and
4. Open burning as defined in Rule No. 22, except when authorized by DEQ or as allowed by the Arkansas Air Pollution Control Code.

The Landfill will comply with the requirements set forth in this section of the regulations.

2.1.7 Litter Control (§22.607(g))

This section of the regulation specifies that litter control provisions shall be maintained at all times, and if weekly or more frequent cover does not control onsite and offsite litter, other methods may be utilized, including but not limited to litter fences and litter crews.

Litter at the site will be controlled by the application of weekly cover, the use of temporary litter crews to collect wind-blown litter, and the installation of litter fences, as necessary.

2.1.8 Additional Surface Water Controls and Best Management Practices (§22.607(h))

This section of Rule No. 22 specifies that in conjunction with and addition to the requirements of §22.614 (Run-on/Run-off Control Systems) and §22.615 (Surface Water Requirements), the owner or operator shall:

- Contour the surface of the working portion of the Landfill to minimize surface water run-on or flow through the working face;
- Install, construct, repair and maintain controls to prevent offsite sediment accumulation at all landfill, soil stockpile, and borrow site areas; and
- Ensure that final and interim slope stabilization conforms to §22.427(f).

The surface of the active portions of the Landfill will be graded to minimize surface water run-on into or through the working faces. Surface water will be managed during filling operations by constructing temporary diversion ditches and berms. Collected surface waters will be diverted to a perimeter drainage ditch around the Landfill that drains to the stormwater detention pond system.

Grading, diking, diversion ditches, silt fencing, silt traps, and other best management practices (BMPs) for stormwater control shall be provided as necessary to control/prevent offsite sediment accumulation from landfill-related operations. In accordance with §22.427(f), exposed slopes will be seeded or stabilized if it is anticipated that these slopes will not be disturbed for more than one growing season.

2.1.9 Final Cover Vegetation and Maintenance (§22.607(i))

According to this section of the regulation, after installation of the final cover system for a closed waste cell, a suitable vegetative cover shall be established and maintained to prevent erosion of cover soils.

In order to establish a good stand of vegetation to prevent erosion of the cover soils, the CLR will seed the final cover (top and side slopes) of the Landfill with a perennial native grass mix or as required by the final cover construction specifications.

Per the regulation, the vegetation will be mowed at least annually or as needed to control the growth of undesirable annual weeds and woody vegetation, and to allow for inspection of the integrity of the landfill cover system.

2.1.10 Equipment Requirements (§22.607(j))

This section of Rule No. 22 specifies that the operator of a landfill shall have provisions for the routine maintenance of equipment at the landfill and that adequate backup equipment shall be available within 24 hours in the event of breakdowns.

The equipment used for operation of the Landfill will vary depending on the daily activities. During periods of intense landfill activity, such as excavation of a new waste cell or closure of a waste cell, additional equipment may be obtained from outside sources.

Equipment maintenance is provided by the CLR. Specific operation and maintenance procedures for equipment are included in the manufacturers' literature, which is maintained in the CLR Solid Waste Facility's administrative office.

Equipment substitutions and additions may occur during the life of the site. If unexpected situations, such as equipment breakdown or construction of a new waste cell area, require additional or replacement equipment, the CLR will make arrangements with local dealers or contractors for rental or lease of substitute equipment.

2.1.11 Communications and Emergency Response (§22.607(k))

This section of the regulation specifies that an adequate telephone communication system must be available at the facility in case of fire or other emergency and that a written response plan must be maintained at the site.

Telephones are available at the Solid Waste Facility administrative offices and the Scale House. Supervisory personnel at the Landfill are equipped with two-way radios and cellular telephones that can be used in the event of an emergency situation. The procedures for an

emergency are discussed further in Section 7.4 of this Operating Plan and are outlined in the CLR Safety Manual and in the Little Rock Emergency Operations Plan, Integrated Emergency Management System.

2.1.12 Employee Facilities (§22.607(l))

This section of the regulation states that the owner or operator must have an onsite building/office with a potable water supply and sanitary facilities for site personnel.

The CLR has onsite administrative offices, a Scale House, equipment maintenance annex, collections building, and an enclosed storage building located at the Solid Waste Facility (see Figure 1.2). Landfill personnel are provided with access to drinking water and sanitary facilities.

2.1.13 Operation to Prevent Bird Hazard (§22.607(m))

This section of the regulation is not applicable because the facility is not located within 10,000 ft of any airport runway.

2.1.14 Nuisance Avoidance (§22.607(n))

This section of the regulation states that a landfill facility should be operated in a manner to avoid creating a public nuisance or public health hazard.

To comply with this section of the regulations, the CLR will execute procedures which include application of weekly cover, litter control, application of final cover material, maintaining stormwater control structures, and general maintenance of the facility.

2.1.15 Cover Maintenance (§22.607(o))

According to this section of the regulation, the integrity of the cover system of a solid waste disposal facility must be maintained and promptly repaired.

To comply with this requirement, the CLR will maintain the cover system integrity and promptly repair erosion, washout, tracking, or other defects in the system that may expose refuse in either the weekly cover or interim cover, or exposure of the barrier system of the final cover. Areas of leachate seepage, or areas exhibiting evidence of leachate seepage such as staining and discoloration, will be promptly repaired as weather allows.

2.1.16 Wet Weather Repairs (§22.607(p))

This section of the regulation states that due care shall be exercised in performing repairs during wet weather conditions to prevent the creation of additional cover defects.

In the event that repairs to the landfill cover system are necessary during wet weather conditions, the CLR shall exercise extra precaution to prevent the creation of additional cover defects. Temporary measures shall be implemented until permanent repairs can be executed. Installation of landfill cover and establishing permanent vegetative cover on closed waste cells will be scheduled during the summer months to minimize working in the wet weather seasons (fall, winter, and spring).

2.2 Procedures for Excluding the Receipt of Hazardous and Unauthorized Waste (§22.608)

This section of Rule No. 22 requires that owners or operators of Class 1 landfills perform periodic inspections of incoming loads and notify DEQ of the delivery or attempted delivery of known or suspected regulated hazardous wastes as defined in 40 CFR Part 261, polychlorinated biphenyls (PCB) wastes regulated under the Toxic Substances Control Act for disposal as defined in 40 CFR Part 761, and additional unauthorized wastes as of the compliance date in Rule 22.103(f).

The CLR has developed a waste exclusion program designed to prevent the receipt of regulated hazardous wastes, PCB wastes, and other unauthorized wastes at the Landfill. The program is described in detail in the Hazardous Waste Exclusion and Special Waste Management Program document that has been prepared for both the Class 1 and Class 4 Landfills. Periodic inspections of incoming loads are conducted in conjunction with the waste exclusion program.

Screening of incoming wastes is accomplished through four primary means. First, customers are advised through correspondence of the types of solid waste accepted for disposal. Second, the entrance sign and a sign at the Scale House list those wastes that are accepted and those that are not. Third, the waste load is examined by the Scale House attendant (a "First Line Inspector") through a remote television camera that allows the attendant to look into the vehicle. If the Scale House attendant observes unacceptable wastes, the attendant will direct the vehicle

to leave the site. Landfill operators are trained to recognize hazardous and unauthorized wastes. Finally, the landfill operators at the working face observe the load as it is dumped from the vehicle. If a landfill operator (also "First Line Inspectors") observes unacceptable wastes, the operator will direct the vehicle operator to pick up the waste and remove it from the site.

If any hazardous or unauthorized waste is discovered, the vehicle license number shall be noted and the employee shall notify the Solid Waste Services Manager, who will then notify DEQ. In addition, a qualified hazardous waste handling contractor may be notified in the event that a hazardous waste emergency is identified. All handling of unauthorized waste will be performed by a trained "Second Line Inspector" or a qualified waste handling contractor in accordance with the procedures in the Hazardous Waste Exclusion and Special Waste Management Program document.

Landfill personnel also perform random inspections of incoming loads to detect and prevent the disposal of regulated hazardous wastes and other unauthorized wastes and a random load inspection form is included in Appendix B. Documentation of all random inspections will be placed in the facility POR.

The facility Hazardous Waste Exclusion and Special Waste Management Program document outlines the training methods for waste screening and lists acceptable and unacceptable wastes, inspection procedures, recordkeeping procedures, and notification procedures. A copy of the Hazardous Waste Exclusion and Special Waste Management Program document is located in the facility POR.

2.3 Cover Material Requirements (§22.609)

According to this section of the regulation, owners or operators of Class 4 landfill facilities must cover disposed solid waste with 6 inches of earthen material at least weekly, or at more frequent intervals, if necessary, to control disease vectors, fires, odors, blowing litter, and scavenging and to limit the generation of leachate. A compacted layer of cover soil of sufficient quantity to ensure there is not exposed waste (not less than 12 inches) must be applied to surfaces that will not receive an additional application of waste or final cover within 180 days.

2.4 Disease Vector Control (§22.610)

This section of Rule No. 22 requires that a landfill facility must prevent or control onsite populations of disease vectors using techniques appropriate for the protection of human health and the environment.

The facility will implement procedures to prevent or control onsite populations of disease vectors using techniques appropriate for the protection of human health and the environment. Although the Landfill will not accept putrescible waste which is likely to attract disease vectors, the application of weekly cover will further discourage the establishment of populations. If disease vectors become a problem, an appropriate exterminator will be contracted to remedy the situation.

2.5 Explosive Gases Control (§22.611)

This section of Rule No. 22 outlines the standards and applicability of explosive gas control systems at Class 4 landfills. According to this section of the regulation, Class 4 landfills are required to ensure that the concentration of methane gas generated by the facility does not exceed 25% of the lower explosive limit (LEL) for methane in structures and 100% of the LEL for methane at the facility property boundary. Owners or operators of Class 4 landfills are not required to implement a routine methane monitoring program unless DEQ determines that:

- The nature and quantity of waste poses a significant potential for the generation of explosive gases; or
- Explosive gases have been detected in concentrations exceeding the standards identified above.

2.6 Air Criteria (§22.612)

This section of the regulation sets forth clean air requirements for solid waste management facilities. These requirements include:

- Meeting the State Implementation Plan (SIP) approved or promulgated by the Administrator pursuant to Section 110 of the Clean Air Act, as amended;
- Prohibiting open burning of solid waste, unless authorized by DEQ or allowed by the Arkansas Air Pollution Control Code; and

- Complying with this section through the periodic application of cover material or other techniques as appropriate.

The Landfill will be operated in a manner that does not pose a fire hazard to personnel or property. However, in the event that a fire does occur, stockpiles of soil shall be readily accessible. Portable fire extinguishers are mounted in all onsite buildings and in each of the city's equipment vehicles. Emergency numbers, including nearby fire departments, are posted in the break room by the time clock.

2.7 Access Requirements (§22.613)

This section of the regulation outlines the requirements of access to the landfill facility. These include controlling public access and preventing unauthorized vehicular traffic and illegal dumping of wastes through the use of artificial barriers, natural barriers, or both, as appropriate to protect human health and safety and the environment. All-weather operational roads shall be provided for vehicle movement.

The CLR controls access to the CLR Solid Waste Facility by a gate at the entrance. A 6-ft high chain-link fence with two strands of barbed wire is installed on the property line along Ironton Cutoff Road, and the remainder of the facility is surrounded by a 4-ft high wire fence with a single strand of barbed wire. The CLR is responsible for providing overall site security and will ensure that the following are implemented:

1. After hours, the gate at the entrance to the site is locked.
2. Programmed radio-frequency identification (RFID) fobs that allow access to the main gate are provided to the CLR Solid Waste Facility's Solid Waste Services Manager, Solid Waste Engineer, Landfill Supervisor, Landfill Foreman, Collections Supervisor, Collections Foreman, Scale House Supervisor, Fleet Services Mechanics, Office Assistant IIs, and the gas system operations and maintenance contractor. Supervisor and the gas system contractor fobs are programmed to allow 24-hour access, while other fobs are programmed to limit access to required working hours.
3. Temporary access is only provided to contractors during construction of new disposal cells or other facilities or during maintenance activities.

4. No access roads or trails are allowed or constructed into the site except for the controlled access road.
5. Landfill operators prohibit any unauthorized access to the landfill area.

After hours, the CLR Police Department will periodically patrol the perimeter of the facility. The Police Department has access inside the facility via a small coded push-button box attached to the control post. The Fire Department has access inside the facility via a keyed Knox box attached to the control post and the Fire Department keeps the only keys to this box. Inside each of the two boxes is a RFID tag for them to use to enter the facility. The Fire Department also has building keys (except for the Scale House).

Disposal vehicles currently access the Landfill via the paved main entrance road located on the northwest corner of the facility. Access to the working face of the Landfill is via permanent perimeter roads around the Landfill. Perimeter roads and temporary access roads are constructed on an as-needed basis. Grading and repairs shall occur as necessary to ensure accessibility. Figure 2.1 shows the facility access road cross-section.

Information and/or directional signs are posted to direct traffic to the working face.

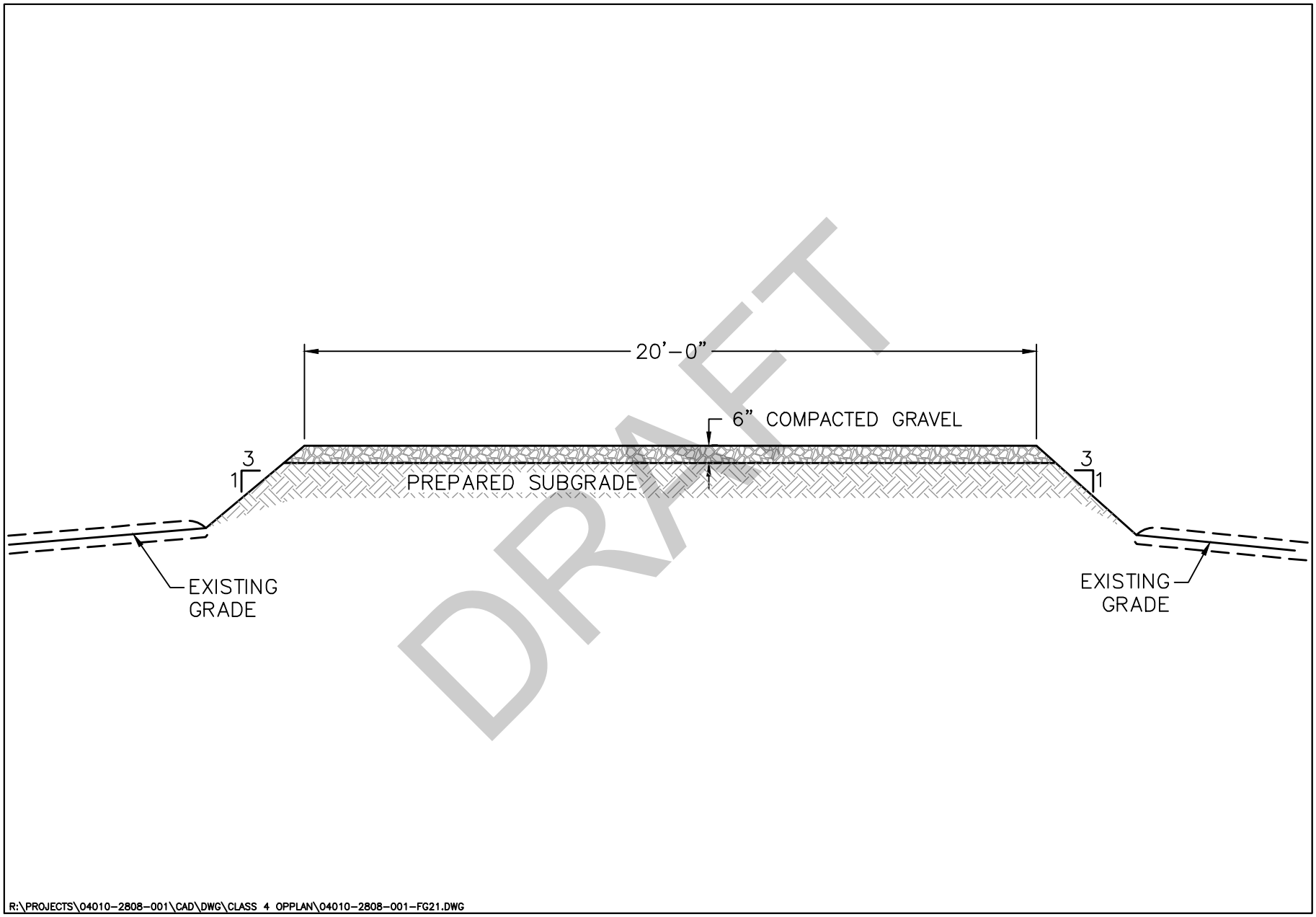


Figure 2.1. Access road detail.

2.8 Run-On/Runoff Control Systems (§22.614)

This section of the regulation states that at a minimum, Class 4 landfills shall design, construct, and maintain:

- A run-on control system to prevent flow onto the active portion of the Landfill during the peak discharge from a 24-hour, 10-year storm;
- A runoff control system from the active portion of the Landfill to collect and control at least the water volume resulting from a 24-hour, 10-year storm if required by DEQ to meet the requirements of §22.615; and
- BMPs for pollution prevention shall be implemented to control the release of sediment and waste from the site.

Compliance with this section of the regulation is described in Section 4.0 of this Operating Plan.

2.9 Surface Water Requirements (§22.615)

This section of the regulation specifies that Class 4 facilities shall not:

1. Cause a discharge of pollutants into waters of the US, including wetlands, that violates any requirements of the Clean Water Act (CWA), including, but not limited to, the National Pollutant Discharge Elimination System (NPDES) requirements, pursuant to Section 402 of the CWA;
2. Cause the discharge of a non-point source of pollution to waters of the US, including wetlands, that violates any requirement of an area-wide or state-wide water quality management plan that has been approved under Section 208 or 319 of the CWA, as amended;
3. Cause a discharge of dredged material or fill material to waters of the US that is in violation of the requirements under Section 404 of the CWA, as amended;
4. Deposit waste in standing water or within 5 ft of the groundwater table unless leachate collection systems are provided and operated; and
5. Allow the discharge of leachate from the landfill unit unless the discharge is permitted under the NPDES system.

Compliance with this section of the regulation is further described in Section 4.0 of this Operating Plan.

2.10 Liquids Restrictions (§22.616)

This section of the regulation outlines restrictions associated with the handling of liquid waste in Class 4 landfills.

Bulk or non-containerized liquid waste and containers containing liquid waste shall not be placed in the Landfill.

Bulk and containerized liquid wastes are not accepted at the Landfill, and the Landfill does not accept liquid waste for treatment or liquid wastes that have been treated at another location. Wastes failing a paint filter test will not be accepted for disposal at the Landfill.

2.11 Recordkeeping Requirements (§22.617)

This section of Rule No. 22 specifies the records to be retained in an operating record maintained at the facility.

Recordkeeping at the Landfill is described in Section 8.0 of this Operating Plan.

2.12 Operating Plan and Narrative (§22.618)

This section requires that each permitted facility develop and implement an operating plan. The purpose of the operating plan shall be to develop and present site-specific methods and procedures by which the facility will maintain and document compliance.

This Operating Plan has been developed to fulfill the requirements of this section of the regulation and will be updated as required to reflect current operations and regulations. Revisions to the document will be submitted to DEQ, which reserves the right to require that the changes be accomplished through permit modification prior to implementation.

2.13 Annual Engineering Inspection Reports (§22.619)

This section of the regulation specifies that an Arkansas-registered Professional Engineer shall inspect the landfill site at least annually and prepare a report addressing operational compliance with permit conditions, permit plans and specifications, the Operating Plan, and all applicable regulations.

In accordance with this section of Rule No. 22, an Arkansas-registered Professional Engineer will inspect the landfill site at least annually. The engineer will prepare a report addressing operational compliance with permit conditions, permit plans and specifications, the facility operating plan, and applicable regulations. The report will address the 12-month period from January through December and shall be submitted to DEQ no later than June 30 of the following year. The report shall contain, at a minimum, the specific requirements as defined in §22.619(b).

2.14 Ground Water Standards for Solid Waste Facilities and Practices (§22.620)

This section of the regulation specifies that a facility shall not contaminate ground water beyond the site's compliance boundary.

The Landfill is designed to comply with all the minimum requirements of Rule No 22 for a Class 4 Landfill. Accordingly, the Landfill will only accept Class 4 wastes, defined as "non-hazardous, bulky, inert, non-putrescible solid wastes that do not degrade". The nature of these wastes, combined with the design of the Landfill's bottom liner and surface water control systems, minimize the potential for ground water contamination from the Landfill.

2.15 Hours of Operation and Signage

The Landfill's normal operating hours are between 7:00 a.m. and 4:00 p.m., Monday through Friday, except CLR holidays. The Landfill is typically open one Saturday per month and the scheduled Saturday is posted on the CLR Solid Waste Services website (http://www.littlerock.org/citydepartments/publicworks/solidwaste/#landfill). At least one licensed landfill operator is present on site during operating hours.

Signs with the name of the facility, Class 4 Landfill permit number, emergency phone number, days and hours of operation, types of waste accepted, unacceptable materials, and tipping fees are posted at the site entrance. There are additional signs within the landfill facility directing traffic to the Class 4 working face and various ancillary facilities.

2.16 Survey Control

This section of the regulation requires that each facility develop and maintain a method of survey control as a means of ensuring and documenting that the facility is developed in accordance with the permit drawings.

A minimum of three permanent horizontal and vertical survey control points, or benchmarks, shall be established onsite and maintained during the life of the Landfill. Additionally, a grid coordinate system consisting of grid markers or signs shall be installed and maintained at locations where they are visible from within the landfill. Disposal operations are tracked on a grid system using the landfill scale computer system. Figure 2.2 identifies the locations of the permanent survey control points and the grid system, as shown in the permit drawings. Figure 2.3 shows a typical landfill grid marker. If any of the permanent survey control points for the site are damaged or destroyed, they shall be re-established and DEQ notified.

Temporary markers shall be placed at the limits of disposal and labeled as “Limits of Waste”. Markers shall also be placed at the edge of the flexible membrane liner at the perimeter of the landfill and labeled as “Edge of Liner”.

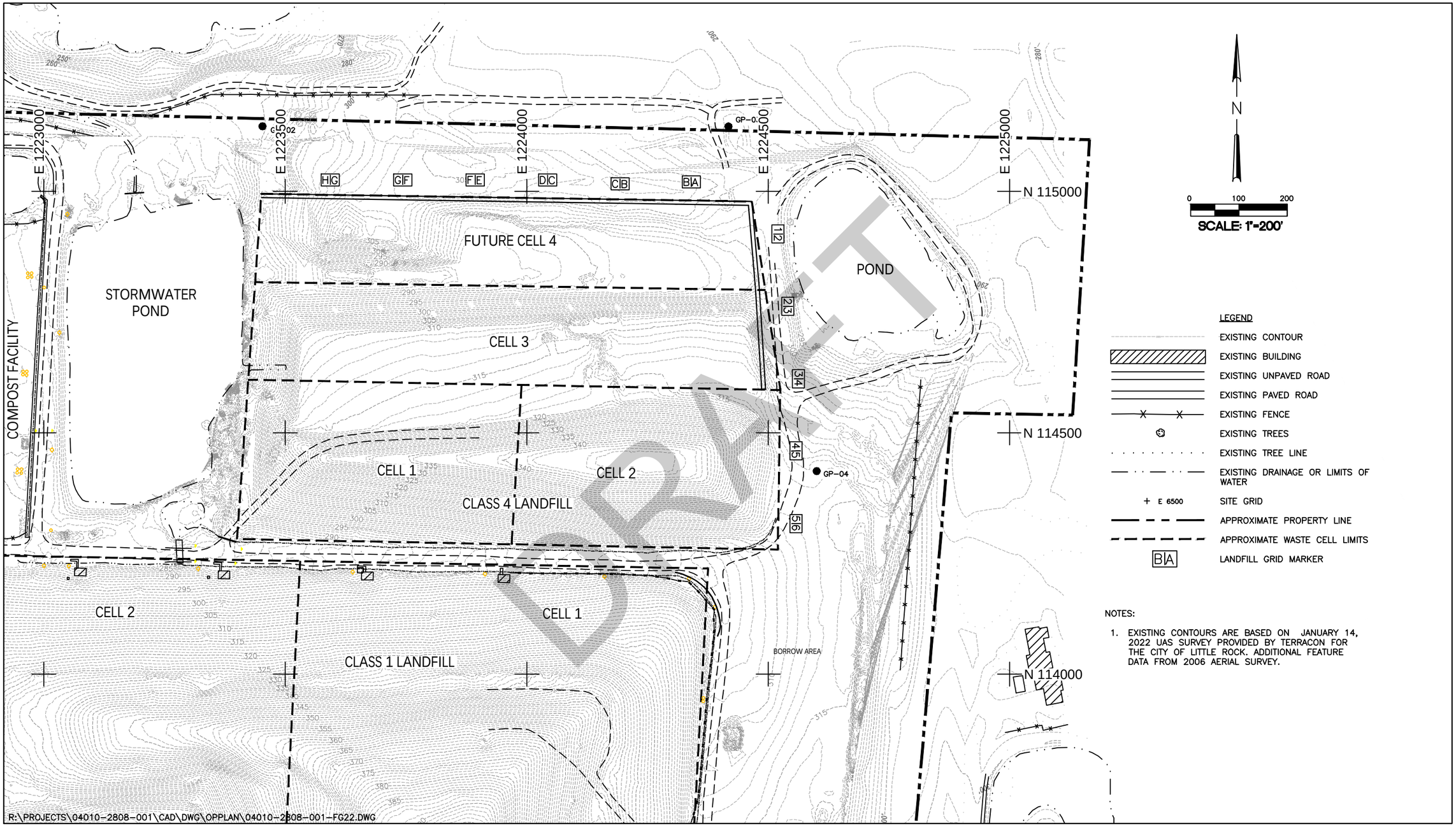
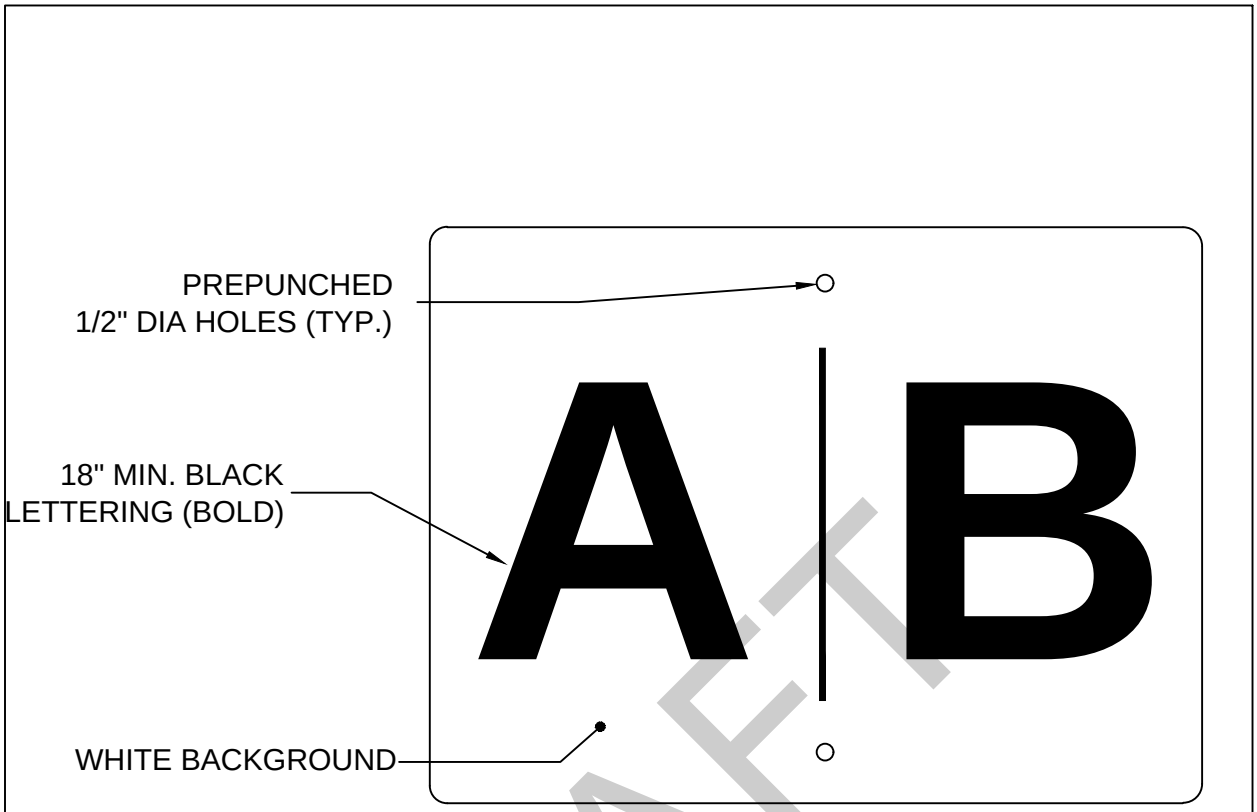


Figure 2.2. Landfill Grid System.



NOTES:

1. SIGN SHALL BE 0.040 THICK ALUMINUM WITH BACKED ENAMEL BACKGROUND, SMOOTH AND ROUNDED CORNERS, AND RUST PROOF AND CORROSION RESISTANT.

2. SIGN SHALL BE MOUNTED TO WOOD OR T-POST.

3. IF STEEL T-POST IS USED, SIGN SHALL HAVE 2 1/2" INCH DIA PREPUNCHED HOLES SPACED 2" INCHES APART ON TOP AND BOTTOM OF SIGN.

4. SIGNS SHALL FACE TOWARD LANDFILL.

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Figure 2.3. Landfill grid markers.

3.0 LANDFILL OPERATING PROCEDURES

Construction and operation of the Landfill is an ongoing activity throughout its life. Construction often takes place at recurring intervals. Ongoing construction activities include development of new waste areas; repair and expansion of access roads and drainage facilities; waste filling; and installation of the landfill cover system.

This section of the document provides guidance to those individuals involved with the daily operations specifically related to the disposal area of the landfill facility.

3.1 Waste Filling Operations

3.1.1 Placement of Waste

Waste is delivered to the site by both public and private haulers that are licensed by the Pulaski County Regional Solid Waste Management District and by self-haulers. Self-haulers deposit their waste in the roll-off boxes provided in the Drop Box Facility.

Public and private commercial haulers take wastes directly to the active waste area. An Arkansas-licensed landfill operator is present at the Landfill to direct disposal activities.

The location for disposal of waste from hauling vehicles varies during the life of a waste cell. For the initial waste placement in a new waste cell, the hauling vehicles haul the waste to the bottom area of the cell for disposal. After the bottom of the cell is covered with the initial lift of waste, disposal operations may continue within the new cell or move to the top of the previously completed disposal area in an adjacent cell and sloped into the new disposal cell. In accordance with §22.607(d) of Rule No. 22, the landfill operator spreads and compacts the waste in the smallest practical area as it is unloaded.

3.1.2 Configuration and Development of Landfill

The Landfill will be developed in four phases, with each phase consisting of one waste cell (Figure 1.2). Waste Cells 1 through 4 are approximately equal in size and have a final maximum permit elevation of about 395 ft NGVD. The cells will be constructed in sequence. As of January 2023, waste has been placed in Cells 1, 2, and 3. When Cells 1 through 4 are filled to

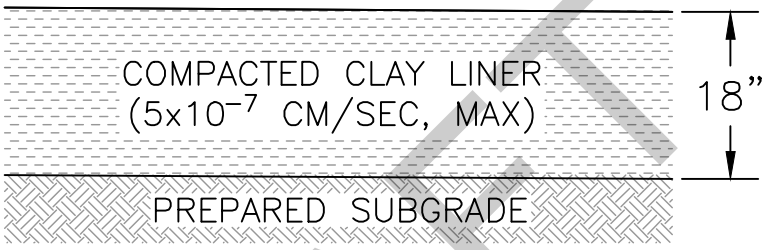
their permitted elevation, the waste will be graded to the permitted elevations and slopes shown on the Permit Drawings, and final cover will be installed.

The bottom elevations for Waste Cells 1 through 4 shall have a minimum slope of 1.0% (Figure 1.3). Per the permit, the side slopes of the completed cells will be graded to three horizontal to one vertical (3:1). The top of the Landfill will be graded to a 5% slope to promote runoff. The Landfill will have a perimeter all-weather access road surrounding the disposal area on the north, south, and east (see Figure 1.5, Final cover plan).

In general, a typical waste cell is developed by the following steps:

1. Construction Drawings and specifications are developed based upon the permit and permit drawings. The Construction Drawings are then submitted to DEQ for review and approval.
2. The new waste disposal area is excavated to the depths and dimensions shown on the Construction Drawings. Excavated soils are stockpiled onsite.
3. A bottom liner system is constructed to the dimensions shown on the Construction Drawings and in accordance with the specifications for the construction project. A typical detail of the bottom liner system is shown on Figure 3.1.
4. The area around the waste cell is graded and diversion berms, channels, and other stormwater controls are constructed to minimize run-on into the waste cell.
5. An initial lift (approximately 10-ft thick) of waste is placed across the entire bottom of new cell.
6. Waste disposal activities are moved to the top of the previously completed waste lift, progressing upward on each new lift.

Waste disposal activities are moved to top of the previously completed and covered waste lift, progressing upward on each new lift.



COMPOSITE LINER BOTTOM OF CELL

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Figure 3.1. Bottom liner system detail.

3.1.3 Site Capacity and Service Life

The planned maximum final elevation of the Landfill is approximately 395 ft NGVD (Figure 1.5). The active area of the landfill is surveyed annually as part of the Annual Engineering Inspection Report (AEIR), as described in Section 8.3.3. Utilizing this information, the CLR determines the amount of airspace used and the amount of airspace remaining in active areas. Based upon the amount of permitted airspace remaining and the 5-year historic average annual disposal rate, utilizing a 1% annual growth rate, the remaining service life of the Landfill is determined. This information will be included in the AEIR and submitted to DEQ each year.

3.2 Bottom Liner System Construction

Cells will be constructed, as described in Section 3.1.2, with a bottom liner system that consists of an 18-inch thick compacted clay layer that exhibits a maximum hydraulic conductivity of 5×10^{-7} cm/sec. Figure 3.1 shows the typical bottom liner.

The bottom liner system for each new cell will be constructed in accordance with the plans and specifications for the construction project.

3.3 Weekly and Intermediate Cover Placement

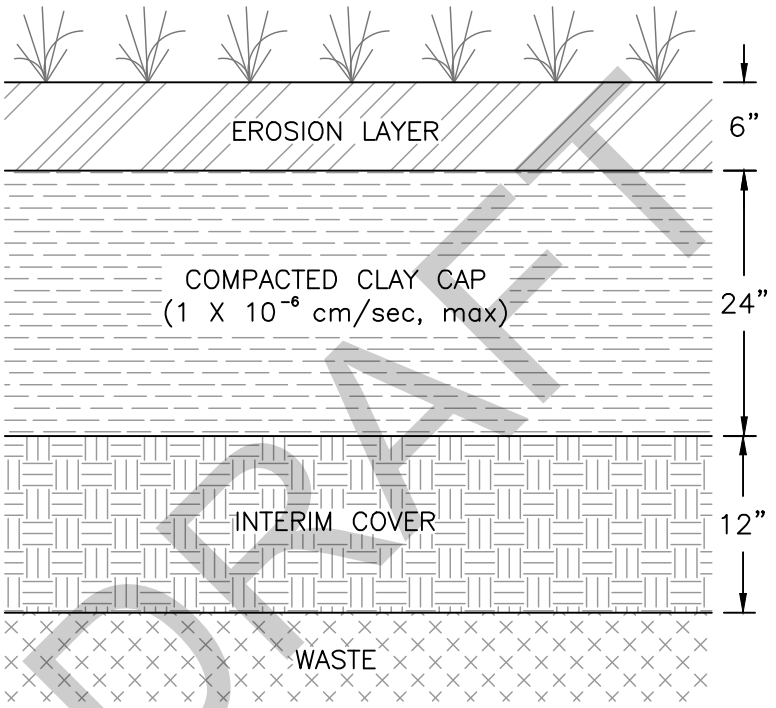
Waste will be covered daily with at least six inches of soil at least weekly or at more frequent intervals, if necessary, to control disease vectors, fires, odors, blowing litter, scavenging and to limit the generation of leachate.

Any active area that does not receive waste or final cover for more than 180 days will be covered with an intermediate cover system that consists of at least 12 inches of soil.

3.4 Final Cover Placement

The final cover will meet the requirements of the facility CQA Plan and the facility Closure and Post-Closure Care Plan. The approved final cover system for the Landfill consists of the following configuration from bottom to top (as shown on Figure 3.2):

- A minimum of 12 inches of monthly and/or intermediate cover;
- Twenty four (24) inches of compacted clay soil with a hydraulic conductivity of no more than 1 x 10^{-6} cm/sec; and
- Six (6) inches of topsoil vegetated with native perennial grasses.



FINAL COVER SYSTEM

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Figure 3.2. Final cover system detail.

The typical cover system will be installed in phases and in accordance with the plans and specifications that are developed for each closure construction project. Construction of the cover system for a completed waste area will be in layers and generally follow the steps below:

1. Installing, compacting and testing the 24-inch thick barrier layer;
2. Surveying the completed barrier layer;
3. Placing the 6-inch thick erosion layer over the barrier layer and grading;
4. Installation of any stormwater control devices;
5. Seeding the erosion layer with native grasses;
6. Surveying the completed cover system to establish the thickness of cover and surveying any additional features related to the cover system (i.e., stormwater structures, roads, berms, etc.); and
7. Developing a certification report by an Arkansas-registered Professional Engineer that will include a summary of all construction activities, description of installed items and materials used, an "as-built" plan at a scale of one inch equals 100 ft or less, and a summary statement signed and sealed by the certifying professional.

Upon completion of installation of the cover system, erosion control devices such as rock check dams, silt fences, or erosion control matting will be installed in areas where excessive erosion may occur such as on side slopes, discharge locations of stormwater structures, and drainage channels (Figures 3.3 through 3.5).

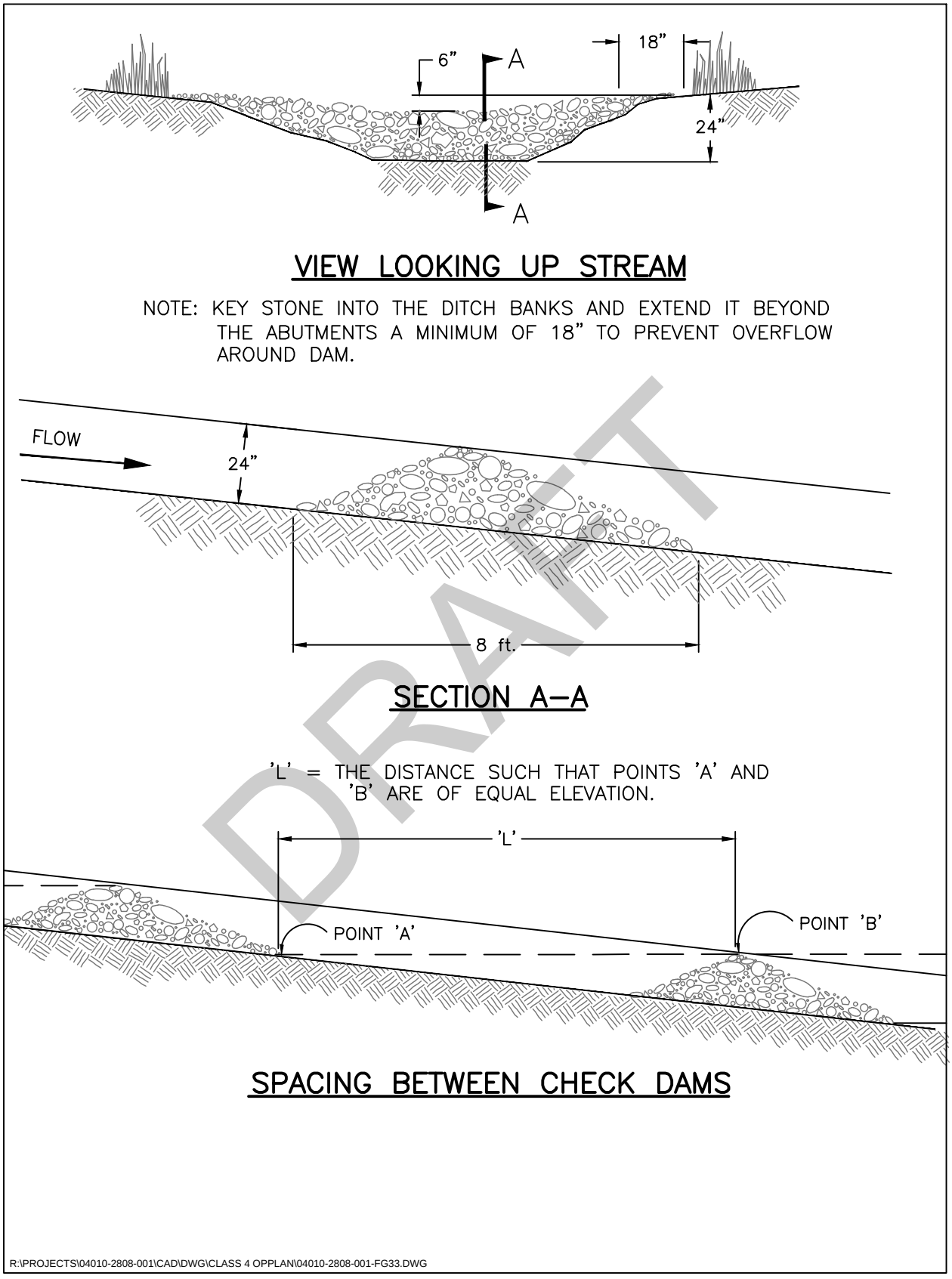


Figure 3.3. Rock check dam detail.

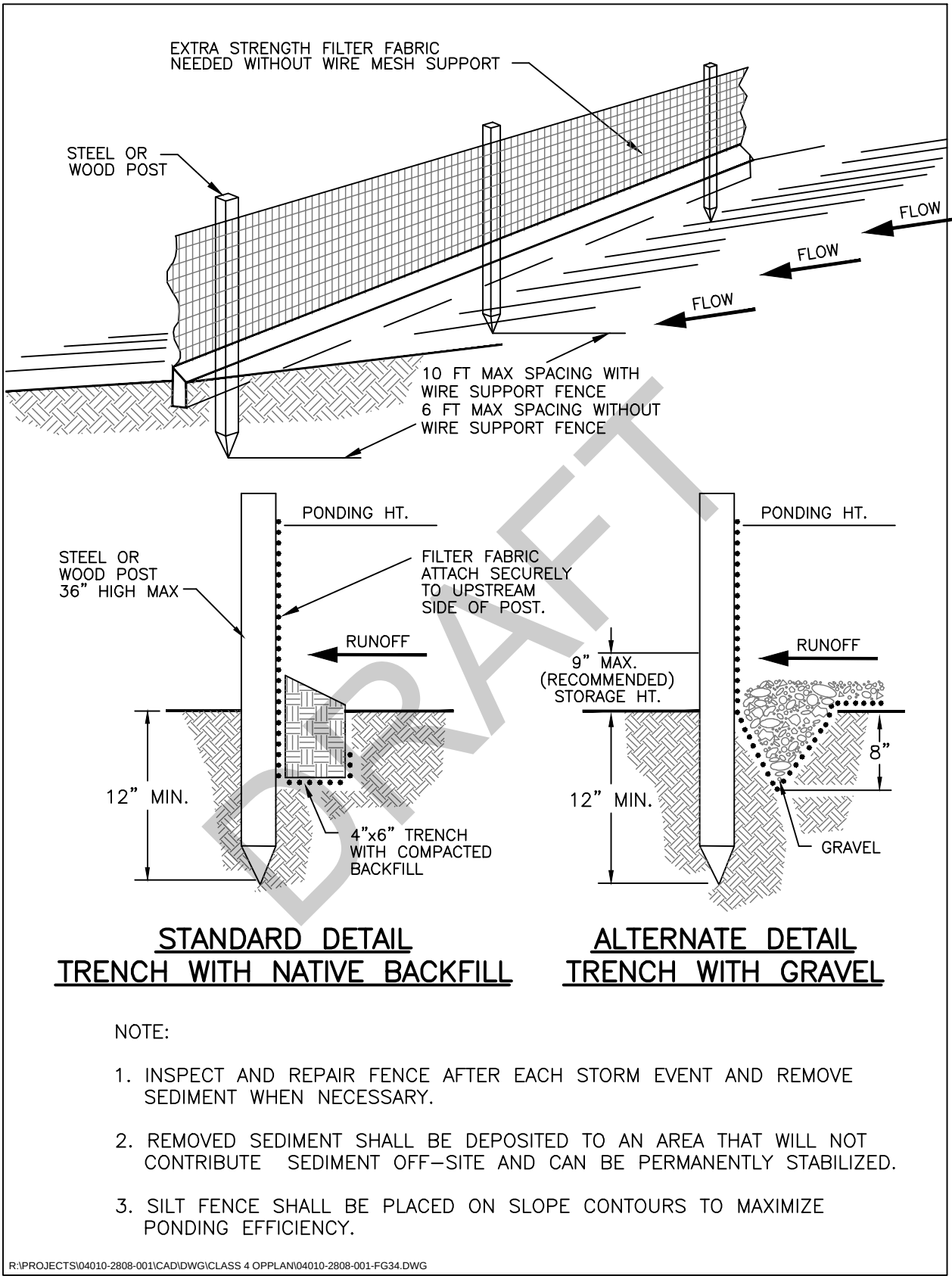
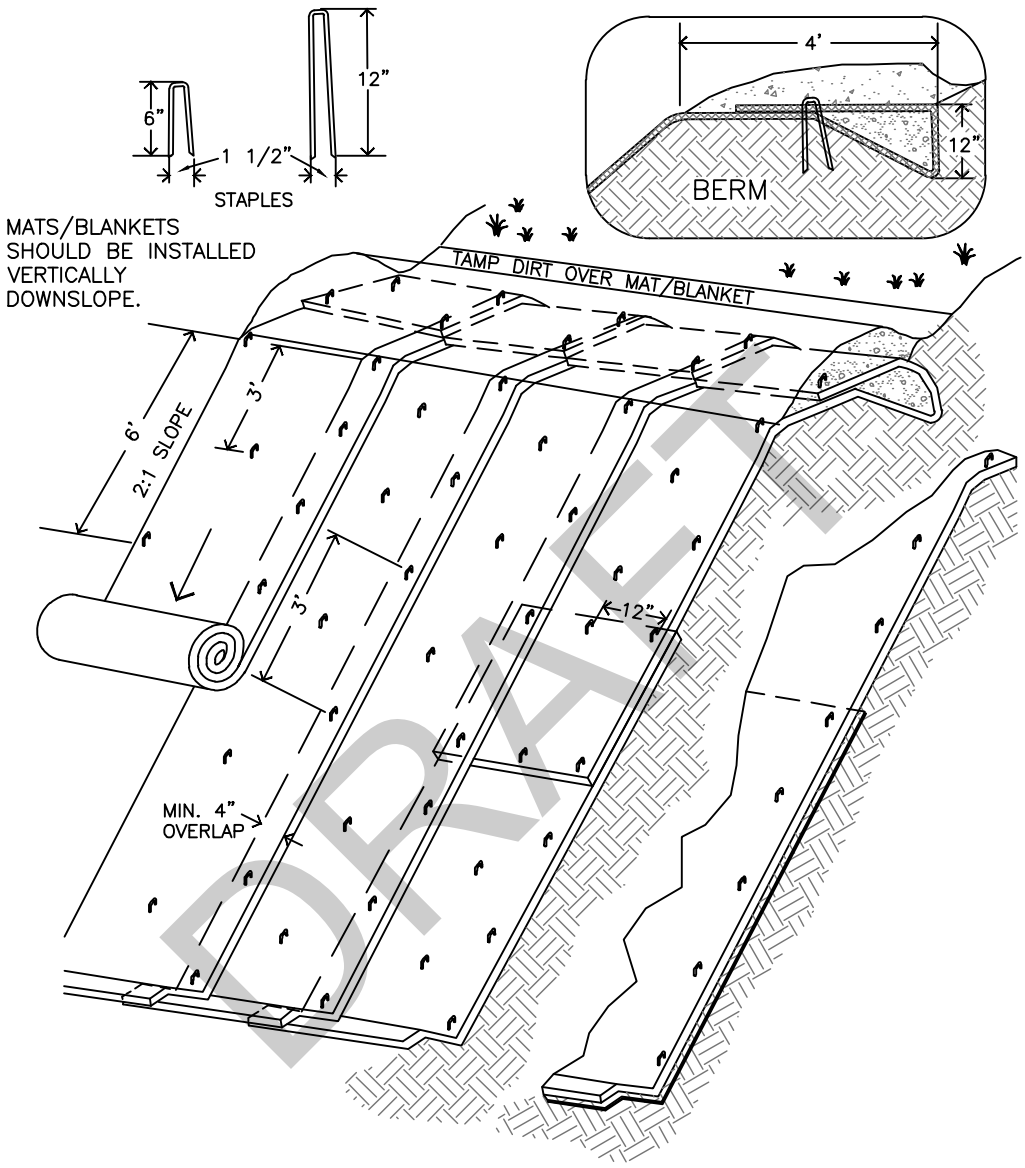


Figure 3.4. Silt fence detail.



NOTES:

1. SLOPE SURFACE SHALL BE FREE OF ROCKS, CLODS, STICKS AND GRASS. MATS/BLANKETS SHALL HAVE GOOD SOIL CONTACT.

2. LAY BLANKETS LOOSELY AND STAKE OR STAPLE TO MAINTAIN DIRECT CONTACT WITH THE SOIL. DO NOT STRETCH.

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Figure 3.5. Erosion control matting detail.

4.0 STORMWATER MANAGEMENT SYSTEM PROCEDURES

A stormwater management system is used at the landfill site to control run-on and runoff. The system is designed to minimize erosion and promote settling of sediments. The primary erosion and sediment control measure is the presence of a vegetative cover on the finished landfill slopes provided by seeding. Other stormwater management system components include diversion berms (Figure 4.1), perimeter ditches (Figure 4.2), and the detention/sedimentation ponds shown on Figure 1.2.

The surface of the working portion of the Landfill will be contoured to minimize surface run-on or flow into or through the working face. Stormwater runoff outside the active waste area is directed away from the active cell(s) by a combination of diversion berms and perimeter ditches and then routed to the detention pond system. Perimeter roads at the facility are developed to shed stormwater towards stormwater ditches that transport run-off to the detention ponds. Water is routed initially to a smaller detention pond (as shown on Figure 1.2) for primary settling before discharge to the larger pond. The water is discharged from the site and monitored under NPDES General Permit No. ARG160036. In addition to prompt seeding of completed waste areas, diversion berms help reduce the potential of erosion of the finished landfill slopes.

Erosion and sediment control measures such as silt fences, rock check dams, and erosion control matting may be used to reduce the potential for excessive sedimentation problems.

4.1 Water Conveyance

Peak flows from the 24-hour, 10-year storm will be contained by the facility's stormwater detention ponds.

Watercourses are designed to reduce erosion. Ditches and swales will be concrete- or grass-lined and will have a maximum gradient of 5%. Steeper slopes will use rock-lined ditches.

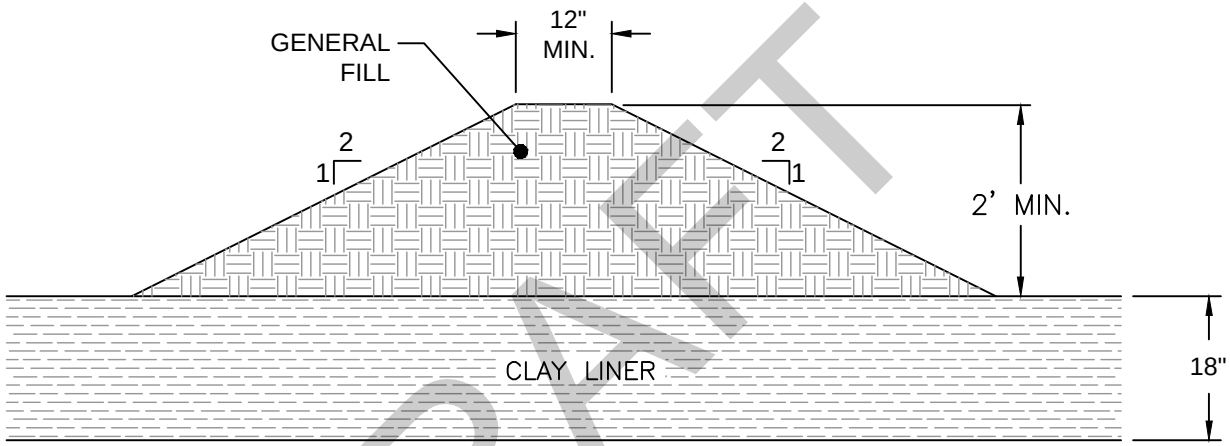

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Figure 4.1. Diversion berm detail.

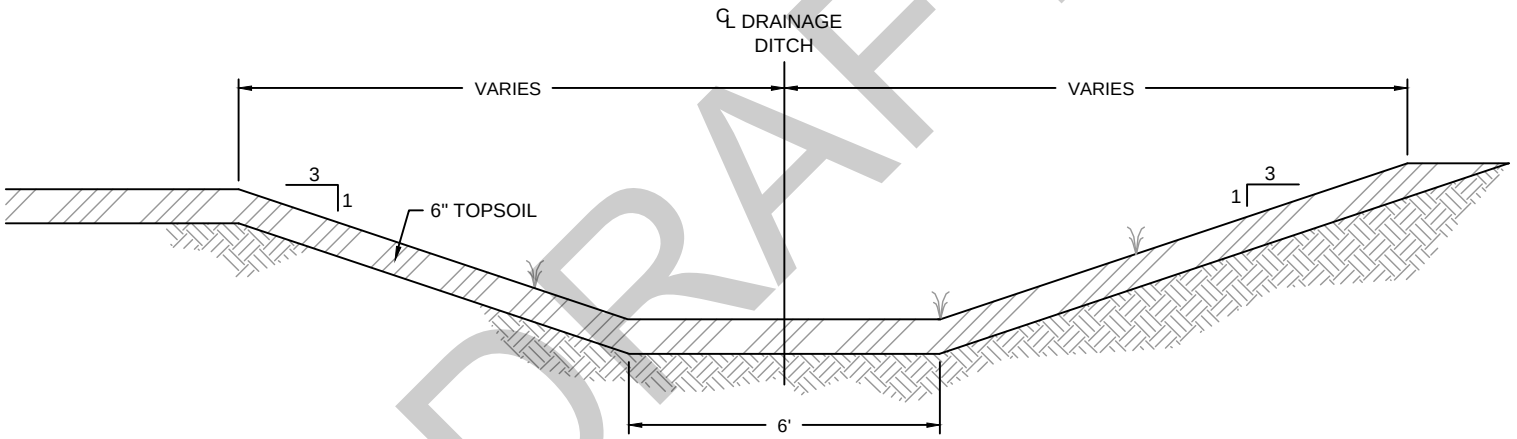

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Figure 4.2. Stormwater ditch detail.

4.2 NPDES Monitoring

Stormwater runoff from the landfill facility is collected in the stormwater detention pond system. The collected water is discharged to an unnamed stream north of the Landfill. The monitoring program is set forth in the permit conditions for Permit No. ARG160036 (the notice of coverage is included in Appendix A), and discharge monitoring reports and stormwater annual reports are included in the POR.

For Permit No. ARG160036, samples are collected from a point downstream of the detention pond outfall.

4.3 Seeding

Seeding of the landfill cover shall be conducted in the spring and fall (typically during February through April and September through November) on recently completed waste cells and areas requiring additional grass cover. Operations are typically timed to provide the maximum area available for seeding operations.

Seeding operations include preparation of the seedbed, applying fertilizer or lime as necessary, applying seed blend, and applying mulch as necessary. Use of fertilizers, pesticides and herbicides will be controlled to prevent potential stormwater contamination and pollutant discharge.

4.4 Erosion Control Measures

Because exposed earth fill is subject to erosion, temporary and permanent erosion control measures are used to mitigate the potential for severe erosion and are part of the active maintenance program at the Landfill. In addition to seeding, other erosion control measures have been incorporated into the landfill design and include grass-lined and riprap-lined ditches.

Temporary erosion control measures will be used as necessary to reduce erosion of exposed slopes on waste disposal areas, berms, or stockpiles until permanent vegetation has been established. Temporary erosion control measures include the following (use will depend on the time of year and the length of time it is anticipated that the soil will remain exposed):

1. Seeding;
2. Tracking slopes perpendicular to the fall line;
3. Covering with mulch;
4. Grass mats; and
5. Diversion ditches and slope drains.

Tracking of slopes (bulldozer tracks made perpendicular to the fall line of the slope) is completed as soon as the slope is finished, regardless of the time of year. Mulching of exposed slopes is done during wet weather conditions when seeding is not possible. Diversion ditches and slope drains will be constructed as necessary to prevent surface water flow from eroding exposed and covered slopes as well as preventing runoff generated on surrounding land from running into the active areas of the Landfill.

4.5 Sedimentation Control

The erosion control measures described in Section 4.4 will be used to reduce sediment in stormwater runoff. Additional sedimentation controls such as sediment barriers and sediment basins will be used to further reduce potential discharge of sediments if necessary.

4.5.1 Sediment Barriers

Sediment barriers include slope measures such as wattles and silt fencing and channel measures such as rock check dams. They are to be installed following construction and as needed during operations. They are most frequently placed on or below disturbed or exposed slopes to prevent silt in overland flow from reaching channels or ditches and within channels or ditches to reduce velocity and encourage silt deposition.

Sediment barriers shall be maintained until permanent vegetation is established. Sediment shall be removed to keep channels open and the soil replaced at the source as required.

Figures 3.3 and 3.4 identify typical sediment barriers.

4.5.2 Sediment Basins

The facility has a detention pond system (two ponds in series) that collects sediments from the Landfill prior to release of the stormwater from the site. Stormwater is initially routed to the smaller pond for primary settling prior to discharge to the larger pond. The smaller pond is dredged as needed to remove the collected sediment. Use of the smaller pond for primary settling minimizes the frequency and need for dredging the larger pond. Sediments are then drained and used as cover soil material. Discharges from the detention pond system are regulated as described in Section 4.2.

Smaller, temporary sediment basins may be constructed upstream of the detention pond system as necessary when large areas are disturbed for construction or borrow activities.

4.6 System Maintenance Procedures

It is important that the stormwater management system at the site is maintained so that it may function properly during a storm event. The following maintenance is recommended especially after large storm events.

1. Keep all ditches and swales unobstructed.
2. Remove sediment from ditches, swales, sediment basins, and sediment barriers routinely. Sediment controls are most effective when sediment is removed regularly.
3. Inspect and clean check dams and other structures of sediment and other materials that may restrict flow.
4. Periodically inspect the stormwater system for damage and repair immediately.
5. Inspect and clean the stormwater system following a major storm event.

Additional inspection and maintenance requirements and procedures are included in Section 6.0 of this document.

5.0 DROP BOX FACILITY

The Drop Box Facility is located north of the Scale House as shown on Figure 1.2 and consists of two 40-cubic-yard roll-off containers placed on a concrete pad below a retaining wall. Self-haulers unload household solid waste (either Class 1 or Class 4 waste) in these two containers by backing up to the edge of the retaining wall.

5.1 Emptying Containers

Material from the roll-off containers is brought to the working face of the Class 4 Landfill at least once per day or more often if necessary. White goods, tires and other materials that must be recovered or recycled are removed from the containers during disposal.

5.2 Maintenance of the Drop Box Facility

The following maintenance activities shall be performed at the Drop Box Facility.

5.2.1 Tipping Area

The tipping area, located above the retaining wall, shall be swept down on a regular basis.

5.2.2 Roll-off Pad

The concrete pad beneath the roll-off containers shall be cleaned periodically, as needed.

5.2.3 Storm Drain

The storm drain located in the northwest corner of the Drop Box Facility should be inspected at least daily and any debris removed to prevent blockage.

6.0 INSPECTION AND MAINTENANCE

Inspections and maintenance of the Landfill will be performed routinely. Records of inspections conducted by CLR personnel and of any actions taken shall be recorded on the Operations Inspection Form included in Appendix B of this document. An inspection and maintenance schedule is included in Table 6.1 of this section. Inspection records are placed in the POR and are available for review.

Table 6.1. Inspection and routine maintenance schedule checklist.

Item	Minimum Frequency
Surface Water System	Monthly
Landfill Cover System	Monthly
Facility Roads	Monthly
Emergency Response Equipment	Monthly
Fences and Gates	Quarterly
Waste Cell and Grid Markers	Monthly
Survey Control Monuments	Annually

6.1 Surface Water System

Stormwater facilities such as ditches, culverts and the sedimentation ponds shall be inspected monthly, and cleaned or repaired as necessary. The smaller of the two ponds in the sedimentation pond system serves as a primary settling basin for sediments and is dredged periodically, as necessary. The larger pond receives less sediment but is also dredged as necessary.

6.2 Intermediate and Final Cover System

The landfill intermediate and final cover systems shall be inspected monthly for evidence of erosion, cracking, or surface depressions. Where severe erosion has taken place, soil cover is reapplied and seeded, given the appropriate seeding conditions. Temporary or permanent erosion control measures will be used if significant erosion occurs. The various types of erosion control methods are discussed in Section 4.4 of this document.

6.3 Facility Roads

Temporary and permanent access roads shall be inspected monthly and maintained regularly to provide easy access and to control dust and mud accumulations. A street sweeper or water truck will keep paved access roads free of mud and dust. The shoulders will be maintained to prevent undermining of the road. Temporary access roads shall be graded and additional material will be applied periodically to keep rutting, wash boarding, mud, and dust accumulation to a minimum.

6.4 Emergency Response Equipment

Check communication equipment, the list of emergency phone numbers, and first aid kits monthly and items replaced as necessary. Test fire extinguishers annually and check the condition once a quarter.

6.5 Fences and Gates

Integrity of facility fencing and gates shall be inspected quarterly and repaired as necessary.

6.6 Waste Cell Markers and Landfill Grid Markers

Inspect waste cell markers and landfill grid markers monthly and repair or replace as necessary.

6.7 Survey Control Monuments

The survey control markers will be inspected annually as part of the annual engineering inspection. Markers will be reestablished immediately if damaged.

7.0 HEALTH AND SAFETY

7.1 Introduction

The primary purpose of this section is to help prevent personal injuries or illnesses that may be caused by conditions typically found at solid waste landfills. It is not the intent of this section to establish a comprehensive safety program for landfill operators; rather to generally present the special hazards related to landfills. For specific information on safety issues, refer to the CLR Safety Manual.

7.1.1 General

The landfill facility should be maintained in such a manner as to continually provide a safe place to work. Analyze jobs, work areas, and procedures from a safety standpoint, and learn to recognize potentially hazardous actions or conditions. When a hazard has been recognized, immediate steps should be taken to eliminate it by corrective action. If corrective action is not possible, guard against the hazard by proper use of warning signs and devices, and by the establishment and maintenance of safety procedures.

The safety hazards associated with landfill operations are many and varied. Accidents may be prevented by using good common sense, applying a few basic rules, and particularly by becoming knowledgeable of the hazards particular to a job.

7.1.2 Reporting and Investigation of Accidents and Illnesses

Accidents must be reported promptly to the employee's immediate supervisor for evaluation and/or investigation. Immediate reporting is mandatory, not only to comply with applicable laws and regulations, but also to ensure that steps are taken to correct the conditions that contributed to the accident. Because every accident includes a sequence of contributing factors, it is possible to avoid a repeat of the first event by recognizing and eliminating these factors. The removal of just a single factor could prevent a recurrence. Refer to the CLR Safety Manual for reporting procedures.

7.2 Potential Hazards

Solid waste personnel work in all types of weather, with many different types of heavy equipment, and with a variety of materials presenting diverse hazards. For this reason, safety equipment must be used and maintained in a sanitary and reliable condition. Personal protective equipment (for eyes, face, head, hearing, and extremities), protective clothing, respiratory devices, and other protective equipment must be worn whenever hazards of processes or environment are capable of causing injury.

First-aid kits are located at the Scale House and in the administrative building. Safety showers and eye washes are accessible to CLR employees for use in the event of exposure to injurious materials.

7.3 Hazard Abatement

The following procedures, guidelines, and recommendations represent standards in the landfill industry presently in use to mitigate or eliminate the various safety and health hazards that may exist at the Landfill.

7.3.1 Traffic Control

To prevent unnecessary traffic in and around the working face, customers will be directed to dump waste only in designated areas.

7.3.2 Scavenging and Salvaging

Scavenging at the Landfill will not be permitted. No salvage operations are conducted at the working face.

7.3.3 Personal Protective Equipment

Personal protective equipment is available for employees' use. Refer to the CLR Safety Manual for requirements on personal protective equipment. Personnel are advised to wear protective clothing as stated in the CLR Safety Manual whenever handling any tools or materials that come in contact with solid waste or leachate.

7.3.4 Operations Safety

Transporting and unloading solid waste is a serious area of safety concern. Uncontrolled dust, differing flows and direction of traffic and operational equipment, and equipment operation angles pose dangers to those in the vicinity of the working face. For these reasons, safeguards will be provided on landfill equipment to protect the operator and the vehicle. Landfill operating personnel who direct the delivery vehicles must take care to maintain sufficient clearance between the vehicle and the landfill equipment. Personnel working around the solid waste are instructed to be continually aware of sharp and jagged items and falling objects. Normal safety precautions will be exercised while operating or working in the vicinity of heavy equipment.

Cleanliness in handling solid waste (which includes household hazardous waste) and/or leachate is essential for personal health. Disease organisms are present in solid waste and leachate and employees face the threat of infection and disease if they come in contact with these organisms. Upon completion of maintenance and repairs, tools are to be washed with soap and water before they are used again.

7.3.5 Fire Prevention and Control

Combustion at the Landfill is possible from spontaneous combustion, chemical interactions, flame contact and the occasional receipt of smoldering refuse from a previous fire event. In the event that a minor fire occurs, landfill operators shall attempt to control it as soon as possible by:

- Covering it with soil;
- Removing and covering it with soil; or
- Using a fire extinguisher.

To assist in fire control, soil stockpiles are readily available. Portable fire extinguishers are kept in all onsite buildings and on all landfill and composting operating equipment. Personnel will be trained in the use of these extinguishers and should become familiar with their locations. The extinguishers will be tested annually and checked quarterly and maintained in a ready condition.

Water from the larger detention pond may be pumped or trucked to assist in fire control. A fire hydrant is located near the Scale House and another hydrant is located by the wash rack building (truck wash, see Figure 1.2).

In the event that a fire cannot be controlled by onsite means, the Little Rock Fire Department will be contacted to respond.

The potential for surface fires can be minimized by not allowing hot loads to be dumped at the site. The potential for subsurface fires can be reduced by restricting the availability of oxygen by effective application of cover soils and LFG extraction system monitoring.

7.4 Emergency Procedures

The emergency conditions discussed in this section are general. It is not intended to cover every possible emergency situation. The site personnel must be constantly aware that problems may arise. In addition, the list of important phone numbers is kept at the Scale House and is updated as necessary. The procedures for an emergency are outlined in the CLR Safety Manual and in the Little Rock Emergency Operations Plan, Integrated Emergency Management System. Table 7.1 provides a list of emergency telephone numbers for landfill employees.

Table 7.1. Emergency telephone numbers.

Emergency	Contact Name or Agency	Contact Number
Fire, Hazardous Waste/Unauthorized Waste Spill or Disposal, Accident/Injuries	911	911
	Little Rock Fire Department	911
	DEQ Solid Waste Management Division	(501) 682-0877
	Mayor's Office	(501) 371-4510
	DEQ Field Inspector	(501) 682-0586
Spills into Surface Water	CLR Mayor's Office	(501) 371-4510
	DEQ Inspection Branch – Water Division	(501) 682-0659
	DEQ Water Division	(501) 682-0656

7.5 Handling of Unacceptable Wastes

Only authorized wastes are allowed for disposal at the Landfill. These wastes include nonhazardous bulky, inert, non-putrescible solid wastes that do not degrade, or degrade very slowly, as defined in Rule No. 22. The Landfill's Hazardous Waste Exclusion and Special Waste Management Program document outlines the procedures for handling unauthorized wastes.

8.0 RECORDKEEPING AND REPORTING

8.1 Landfill Permanent Operating Record

The city maintains the POR for the Landfill at the administrative offices of the CLR Solid Waste Facility. The POR contains all records required by this regulation or permit conditions. All information contained in the facility operating record is available for inspection and is provided to DEQ upon request. The CLR will maintain these records until the Director of DEQ authorizes the destruction of the records following the completion of the post-closure care monitoring period.

In accordance with §22.617, the POR includes the following information:

1. Location restriction demonstrations;
2. Closure and post-closure care plans and any monitoring, testing, or analytical data as required by Chapter 13;
3. Cost estimates and financial assurance documentation required by Chapter 14;
4. Quality assurance/quality control (QA/QC) documentation, certification, and test results relating to the construction of the landfill liner, groundwater monitoring system if applicable, and final cover system;
5. Records of any periodic inspections required by Rule No. 22 or by permit conditions; and
6. Any other records required by Rule No. 22.

Notifications of the above entries have been or will be submitted to the Office of Land Resources (OLR) of DEQ as required by §22.617. In addition, when documents pertaining to the above items have been placed, replaced, or added to the POR, the OLR will be notified in writing.

Specific records to be maintained in the POR are discussed in the following sections.

8.2 Inspection Log

8.2.1 Inspections by CLR Personnel

Inspections of the overall site, facilities, and operations are carried out on a routine basis. Inspections are performed often enough to identify problems in time to correct them before they harm human health or the environment. Inspections also prevent malfunction, deterioration, and operator error from affecting the performance of the facilities and operations.

The frequency of inspections is noted on the inspection checklist Operations Inspection Form is located in Appendix B of this document). Inspections are also carried out after any major storm event or natural disaster. The inspection checklist will be kept in the POR and will be made available to the OLR of DEQ on request.

8.3 Reports

8.3.1 Waste Quantity Reports

The Landfill maintains a "ticket" system as a means of recording the waste that is received by the facility. Landfill scales are in place that weigh all solid waste received at the facility and the scales are maintained and operated in accordance with United States Department of Agriculture standards.

The facility prepares and submits the required waste quantity reports on a quarterly basis to DEQ. The reports include the weight and class of solid waste that has been disposed at the Landfill during the previous 3 months. Copies of waste quantity reports will be maintained in the facility POR.

8.3.2 Monitoring Results

Records of monitoring activities and results are submitted to DEQ, as required, and will be maintained in the facility POR until destruction of the records is authorized by the Director of DEQ following completion of the post-closure care monitoring period.

8.3.3 Annual Engineering Inspection Report

An annual engineering inspection report (AEIR) will be prepared by an Arkansas-registered Professional Engineer and submitted to the OLR of DEQ by June 30 of each year. In accordance with §22.619, this document will include the previous calendar year's activities and the following, at a minimum:

1. The volume remaining in the current landfill cell or area and the projected date for opening new cells or areas;
2. The estimated landfill air space utilized during the past reporting period and the remaining permitted site life considering the current waste stream;
3. Compliance of facility fill progression with the approved permit plans and specifications, and this Operating Plan;
4. Operational compliance with the requirements of Rule No. 22, facility permit conditions, permit plans and specifications, and this Operating Plan;
5. An updated contour map showing the items required by §22.619(b)(5);
6. Maintenance of stormwater controls and other BMPs for erosion control;
7. Status of capping and closure of completed waste areas;
8. Status of remedial or corrective actions taken;
9. Updated financial assurance documentation;
10. Revised or updated facility Closure Plan; and
11. Any other items that affect compliance at the Landfill.

8.4 Incident Reports

8.4.1 Emergency Reports

The CLR will submit a written report to the OLR of DEQ within 48 hours after an emergency has occurred at the landfill facility. The report will describe the emergency and the actions taken to minimize hazards to human health and the environment. The report will also outline any follow up procedures that will be implemented. Emergencies include fires, explosions, storm damage, and any other events requiring the prompt intervention of CLR personnel, police, fire department, or other public health and safety officials.

8.4.2 Notifying Government Agencies

In the event that the CLR does not, or is unable to, comply with any of the conditions specified in the facility's operating permit, the city will do the following:

- Provide the OLR of DEQ with a description of the nature and cause of noncompliance;
- Inform the OLR of DEQ of the period of noncompliance, including exact dates and times and/or the anticipated time when the facility will return to compliance;
- Notify the OLR of DEQ of steps taken or to be taken to reduce, eliminate, and prevent recurrences of the noncompliance; and
- Take the first three actions listed above within 24 hours in the case of any noncompliance that could constitute a threat to human health, welfare or the environment, and, if the requisite information is provided orally, provide it in writing within 5 days, unless this requirement is waived or extended by the OLR of DEQ on a case-by-case basis.

The OLR of DEQ will be notified:

- Whenever there has been or there is an anticipated violation of the conditions in the operating permit;
- Whenever there has been or there is an anticipated material change in the quantity of waste disposed at the facility; and
- Whenever there has been or there is an anticipated material change in the type of waste disposed at the facility.

APPENDIX A

Current Permits

66-01071

STATE OF ARKANSAS
DEPARTMENT OF POLLUTION CONTROL AND ECOLOGY
8001 NATIONAL DRIVE, P.O. BOX 8913
LITTLE ROCK, ARKANSAS 72219-8913
PHONE: (501) 562-6533
FAX: (501) 562-2541

PERMIT
FOR THE CONSTRUCTION AND/OR OPERATION OF A SOLID WASTE DISPOSAL FACILITY

CLASS I, CLASS IV, AND COMPOST FACILITY

Permit No. 266-S EFFECTIVE DATE April 27, 1993

City of Little Rock
Public Works Department
701 West Markham
Little Rock, AR 72201

Location: In portions of Sections 9 & 10, T-1-S, R-12-W, Pulaski County, Arkansas. Approximately 1/2 mile southeast of intersection of Highways 338 and 367.

This permit is your authority to construct and/or operate the Solid Waste Disposal Facility set forth in your application dated January 15, 1993. This permit is issued pursuant to the provisions of the Arkansas Solid Waste Management Act (Act 237 of 1971; Sec. 82-2701 et seq., Ark. States.), hereinafter called the "Act", the Arkansas Solid Waste Management Code, hereinafter called the "Code", and all other applicable rules and regulations of the Department of Pollution Control and Ecology, hereinafter called "Department", and the following terms and conditions:

1. The disposal facility shall be constructed, maintained, and operated in accordance with the final plans and specifications as approved by the Department and in compliance with all applicable provisions of the Act, the Code, and all other applicable rules and regulations.

2. This permit shall automatically terminate unless construction of the disposal facility has been commenced within 180 day(s) of the date hereof and completed with all reasonable diligence. The Department shall be notified in writing when the disposal facility has been completed in order that it may be inspected.

3. The disposal facility shall be operated by qualified personnel and maintained in good operating condition at all times.

4. This permit may be revoked or modified whenever, in the opinion of the Department, the facilities are no longer in compliance with the Act, the Code, and applicable rules and regulations. This permit shall not relieve the permittee, its agents or employees, from compliance with all provisions of the Act and the Code.

5. Nothing herein contained shall be construed as releasing the permittee from any liability for damage to persons or property by reason of the installation, maintenance, or operation of the disposal facility.

6. This permit is issued in reliance upon the statements and representations made in the application and the plans and specifications and the Department has no responsibility for the adequacy or proper functioning of the disposal facility.

PLEASE SEE ATTACHED SHEET FOR ADDITIONAL CONDITIONS.

Approved:

DEPARTMENT OF POLLUTION CONTROL & ECOLOGY By _____ for
Director

4-27-93
Date

7. This permit is for 240 acres with 128 acres to be landfilled (110 acres Class I and 18 acres Class IV). The permit will expire when the 128 acre disposal area described in the final engineering plans has been filled to design capacity and is closed out in accordance with the provisions of the Arkansas Solid Waste Management Code as Amended. Post closure maintenance and monitoring will be a minimum of 15 years after closure and may be extended due to the necessity of leachate management or other factors.

8. Waste disposal operations at the site shall not commence until an initial permit application fee in the amount of $3,500.00 is received and acknowledged by the Department. The fee shall be submitted in accordance with Section 10 of Regulation No. 9: Permit Fees. Failure to pay annual permit fees when due may result in revocation of the permit.

9. The amount of financial assurance required is $782,000.00. The instrument used must be in the exact form set forth in Appendix "B" of the Code and must be filed with the Department before the permit can become effective. After April 9, 1994, the permittee must comply with Financial Assurance Criteria (40 CFR Part 258, Subpart G) for closure, post-closure care, and corrective action.

A portion or all of the financial assurance may be held by the Department between the time of completion of the landfilling operation to ensure satisfactory closure and post-closure care in accordance with the Code and Act 521 of 1989.

10. In addition to the Arkansas Solid Waste Management Code as amended and permit conditions herein, the permittee must comply with requirements of 40 CFR Part 258 - Solid Waste Disposal Facility Criteria: Final Rule, October 9, 1991 (Subtitle D).

11. The permittee shall maintain an Operating Record on-site (or at an alternative location approved in writing by ADPCE&N) of all documentation, monitoring or test results, records, and certifications required by Subtitle D, the Solid Waste Management Code, the Facility Operation and Maintenance Manual, and/or permit conditions herein. The permittee shall forward a copy of information from the Operating Record to ADPCE&N when requested by the Department.

12. Proper preparation of the site shall be supervised and reported in writing to the Department by a Registered Engineer prior to placement of any waste in the landfill. The report shall include a summary of quality assurance/quality control (QA/QC) results for the clay liner system and the FML liner system, a map indicating the location and extent of actual liner installation, the total linear feet of FML liner seamed, and the total area of liner installed (square feet). Each subsequent lift (or portion of an Area) of the Class I facility shall similarly be supervised and reported in writing to the Department by a Registered Engineer prior to placement of waste in that Area. All test results, inspection results,

reports, acceptances, certifications, minutes, memorandums, shop drawings, layout plans, as-built drawings, submittals, and documentation required by the plans/specifications, contract documents, QA/QC plans, and/or permit conditions herein shall be maintained in the facility Operating Record for review by authorized regulatory personnel.

Performance for re-construction, repair, or replacement of deficient portions of the clay liner system or the HDPE liner system shall be addressed in QA/QC plans. This shall include verification of repairs and conformity to insure compliance with the plans/specifications, contract documents, and permit conditions herein.

13. Quality Assurance Testing For Earthwork

Test, test method, minimum test frequency, and passing criteria for the following materials shall be in accordance with Table 1 - Earthwork Testing Requirements, Section 02200 - Earthwork, Part II - Technical Specifications, Contract No. 1 of the Contract Documents.

- Prepared Subgrade
- Class 1 Landfill Liner
  - Clay Liner Layer
  - Cement Backfill Layer
- Class IV Landfill Layer
- Clay for Compost Facility

A written Quality Assurance/Quality Control (QA/QC) plan for the construction of the clay liner system shall be prepared prior to initiation of construction. The QA/QC plan shall include procedures and safeguards that will be implemented to protect the clay liner from damage from equipment, stormwater, desiccation, and freezing.

14. High Density Polyethylene (HDPE) Liner System

A written Quality Assurance/Quality Control (QA/QC) plan for construction of the HDPE liner system shall be prepared prior to initiation of construction. The QA/QC plan shall include the following minimum testing requirements:

Nondestructive Testing

All field seams shall be nondestructively tested over their full length using either air pressure testing, vacuum test unit, or other method approved in writing by ADPCE. Continuity testing shall be carried out as the seaming work progresses, not at the completion of all field seaming. Results of seam testing shall be recorded daily for Daily Progress Reports.

For air pressure testing, the following criteria must be met:

Sheet Thickness	Test Pressure psi Min.	Test Pressure psi Max.	After 5 Minutes Max. Pressure Drop Allowed
60 mil	27	30	3 psi
80 mil	27	30	3 psi
≥ 100 mil	30	30	3 psi

For vacuum testing, no bubbles should appear with vacuum of 5 psi after a minimum dwell time of 15 seconds.

Destructive Testing

Pass/Fail Criteria for HDPE Seams:

Test	Liner Thickness (mils) 60	80	100	Minimum Testing Frequency
Shear (ASTM D3083)	126 ppi	171 ppi	216 ppi	1/500' of weld
Peel (ASTM D413)	70 ppi	95 ppi	115 ppi	1/500' of weld

ppi = pounds per inch width

The QA/QC plan for the HDPE liner system shall include procedures and safeguards that will be implemented to protect the HDPE liner from damage during transport, storage, layout, installation, construction (through placement of drainage layer material over the liner), and operation of the landfill.

15. Piezometers/Monitor Wells

Each piezometer/monitor well shall be designed and constructed in accordance with ASTM D5092 - "Design and Installation of Groundwater Monitoring Wells in Aquifers." Landfill plans shall be revised to include location, unique sequence number or designation for each well, and details of all piezometers. Each installed piezometer shall be permanently marked with the appropriate unique identification sequence number or designation corresponding to the plans.

16. The static water level in each of the seventeen (17) piezometers/monitor wells shall be monitored and reported to the Department at least once per quarter during the active life of the facility to ensure that groundwater maintains a positive gradient toward the landfill. If a positive inward hydraulic gradient is not maintained for two consecutive events, the permittee must notify the Department for a determination of whether installation of an alternate groundwater monitoring system may be required. Monitoring of piezometers may be reduced in frequency or suspended during the closure and post-closure periods, provided the permittee makes such request in writing to ADPC&E and supports the request with a summary and analysis of historical results indicating that monitoring at less frequent intervals would be appropriate.

17. Monitor wells MW-1, MW-2, MW-3, MW-4, MW-5, MW-5A, MW-6, MW-7 and MW-8, and groundwater from the Gradient Control Sump(s) shall be independently sampled and analyzed prior to the receipt of waste in order to obtain background water quality data. Groundwater sampling and analysis shall comply with the requirements of Subpart E of 40 CFR Part 258 (Subtitle D). A minimum of four independent samples from each piezometer and the Gradient Control Sump(s) must be collected and analyzed during the first semiannual sampling event and reported to the Department.

Groundwater shall be removed from the Gradient Control Sump(s) at intervals sufficient to avoid the buildup of hydrostatic pressure upon the landfill bottom liner system.

Groundwater from the Gradient Control Sump(s) must be sampled, analyzed, and reported quarterly for the first year of operation, and twice annually thereafter unless more frequent monitoring is deemed necessary by the Department.

The total groundwater flow that is pumped from the Gradient Control Sump(s) shall be monitored and recorded at least once per week. The total groundwater flow for each quarter (first year of operation) and semi-annually (thereafter) shall be reported along with groundwater analytical results. The flow shall be measured by standard flow meter approved by the Department, or by the timed-pump method. If the timed-pump method is used, the permittee shall install permanent run-time meters on each gradient control sump pump and maintain records of pump calibrations.

In the event the groundwater gradient control system does not function as designed, the Department may require revision of the system or an alternate monitoring system.

18. Sampling of groundwater and measurement of static water levels shall only be done by trained personnel familiar with proper procedures and techniques. Analysis of groundwater samples shall be performed only by wastewater testing laboratory(ies) certified by ADPC&E. Results are to be

submitted directly to the Department from the contract laboratory and shall include the following parameters:

- Water level normalized to sea level
- Ammonia (as N)
- Bicarbonate
- Calcium
- Chloride
- Iron
- Magnesium
- Manganese
- Nitrate
- Potassium
- Sodium
- Sulfate
- Total Organic Carbon
- Total Dissolved Solids
- Turbidity
- pH
- Appendix I constituents of 40 CFR Part 258

Analysis of Appendix I volatile organic compounds (VOCs) shall be according to EPA Methods 624 and 625 utilizing method detection limits rather than practical quantitation limits (PQLs). Sampling parameters are subject to revision by the Department at any time.

Monitoring wells in which turbidity values exceed 5 Nephelometric Turbidity Units (NTU) must be redeveloped. If the turbidity remains above 5 NTU, the integrity of the well must be evaluated by a qualified groundwater scientist. If the well is found to be unreliable it must be replaced prior to the next scheduled sampling event.

19. The permittee must develop a comprehensive written plan for sampling and analysis of groundwater that ensures accurate groundwater monitoring results. The plan must be submitted to the Department for approval prior to receipt of waste at the facility. The plan must include procedures and techniques for:

- Sample Collection
- Sample Preservation and Shipment
- Analytical Procedures
- Chain of Custody Control
- Quality Assurance and Quality Control

20. A statistical method to be used for evaluating monitoring results for each groundwater constituent must be selected by the permittee and approved by the Department prior to the receipt of waste. The method selected must meet the requirements of Section 258.53 of 40 CFR Part 258. The permittee must determine whether there is a statistically significant increase (or decrease in the case of pH) for each groundwater monitoring constituent in conformance with the requirements of Section 258.53 of 40 CFR Part 258.

21. If a statistically significant increase over background has been detected for one or more of the Appendix I constituents, the permittee must proceed with an assessment monitoring program in accordance with Section 258.55 of 40 CFR Part 258, including sampling and analyzing for Appendix II constituents.

If one or more of the Appendix II constituents has been detected at a statistically significant level exceeding the groundwater protection standards defined under Section 258.55(h) or (i) of 40 CFR Part 258, the

permittee must initiate an assessment of corrective measures in accordance with Section 258.56. Based upon the results of the assessment, the permittee must proceed with selection of a remedy in accordance with Section 258.57 and then proceed with implementation of a corrective action program in accordance with Section 258.58.

22. This facility is for the disposal of all waste eligible for a Class I sanitary landfill including the following special materials (as listed in Appendix "A" of the Arkansas Solid Waste Management Code-March 23, 1984):

- Friable Asbestos Material
- Condemned Food
- Dead Animals
- Spent Pesticide & Herbicide Containers (from City Services Only)

Disposal of "special materials" shall be handled in accordance with Appendix "A" of the Solid Waste Management Code. Written approval from the Department must be obtained prior to disposing of all other "special materials" not listed above.

The permittee shall maintain a list of industrial customers of the facility and information about the nature of each industrial waste disposed at the facility. Information about the nature of industrial wastes may be maintained on ADPC&E's "Industrial/Special Waste Disposal Request" forms or on similar forms prepared by the permittee and approved by the Department.

23. Disposal of bulk liquid waste in the landfill is prohibited. "Liquid waste" is waste which contains "free liquids" as defined by Method 9095 (Paint Filter Liquids Test) as described in EPA Publication No. SW-846.

24. Any proposed transfer of this permit will require submission of a permit modification application, a disclosure statement in accordance with Act 454 of 1991, and the documentation noted in Section IX of the Solid Waste Management Code. A decision to approve or deny a permit transfer request will be made by the Department pursuant to the provisions of Act 454 and Section IX of the Code.

25. Leachate shall be removed from Leachate Sumps at intervals sufficient to avoid ponding of leachate upon the 60-mil HDPE geomembrane bottom liner of the landfill; the maximum allowable depth (head) of leachate upon any portion of the geomembrane bottom liner at any time is 12 inches (30 cm).

The total flow removed from each Leachate Sump by leachate sump pumps shall be monitored and recorded at least once per week. The total leachate flow for each quarter (first year of operation) and semi-annually (thereafter) shall be reported along with groundwater monitoring data (Conditions 16., 17. & 18. herein). The flow shall be measured with standard flow meter approved by the Department, or by the timed-pump

method. If the timed-pump method is used, the permittee shall install permanent run-time meters for each leachate sump pump and maintain records of pump calibrations. Leachate removed from sumps shall be pumped to the Leachate Pond and thence discharged to the Little Rock Sanitary Sewer System in accordance with requirements of the Little Rock Wastewater Utility (LRWWU). Records of all leachate flow monitoring and testing specified in the Operation and Maintenance Manual, required by the LRWWU, and/or required in permit conditions herein shall be maintained by the permittee in the facility Operating Record for review by authorized representatives of ADPC&E.

Discharge of leachate to the Detention Pond or to surface drainage is prohibited.

26. The permittee must cover disposed waste (Class I facility) with at least six inches of soil at the end of each operating day, or at more frequent intervals if necessary, to control disease vectors, fires, odors, blowing litter, and scavenging.

Alternative materials for daily cover, such as synthetic materials, shall only be used when specifically authorized in writing by ADPC&E. Any alternative for daily cover that is proposed by the permittee must comply with Department guidelines and include specific written operating procedures that will be implemented to control disease vectors, fires, odors, blowing litter, and scavenging. The use of synthetic material will not be authorized unless it is incorporated within operating procedures that also rely on the use of at least six inches of soil for daily cover on some days; any proposal for daily cover based solely upon full-time use of synthetic material will not be approved.

27. Seeding and soil stabilization shall be conducted in the spring and fall on all exposed surfaces. Furthermore, revegetation shall be accomplished immediately after final elevations are completed. Cover vegetation shall be properly mowed at least once per month during the growing season so that proper inspection of the cover can be made.

28. Sediment control fences shall be constructed and maintained in the drainage channels of the active areas of the site. Sediment shall be removed to keep channels open and the soil replaced at the source as required.

29. Erosion and sediment control measures shall be implemented at all soil borrow areas both within and outside of the 240 acre permit area that are used in conjunction with landfill construction or operation (such as for clay material for bottom liner, soils for daily or intermediate cover, or clay material for final cover). The permittee shall maintain a map in the Operating Record showing the locations of all off-site borrow areas so that ADPC&E can periodically evaluate the effectiveness of erosion/sediment control measures at each site. In addition to the location map, the permittee shall also maintain map(s) of each borrow site

indicating site boundaries and area (acres), and the name, address and phone number of the contractor or operator of each borrow site.

Borrow sites may also be subject to stormwater permitting requirements under the NPDES Permit system. Stormwater permitting requirements may vary from site to site; the contractor or operator of each borrow site should contact the NPDES Branch of ADPC&E (phone number: 570-2160) before work is begun at a site.

30. Litter control fences shall be maintained in the active fill areas for the control of blowing litter.

31. The final grades/elevations as shown on the approved engineering plans shall not be adjusted due to settling/consolidation of the waste mass. Therefore, the actual final grades/elevations after closure/post closure may be lower than that indicated on approved plans.

32. Disposal of ash or wastewater treatment plant sludges, other than from a strictly domestic source, shall not be placed in the landfill without Department authorization. Such disposal may require modification of the permit.

33. Petroleum contaminated or other contaminated soils shall not be placed in the landfill without Department authorization.

34. Operations at the facility shall be under the supervision of an on-site sanitary landfill operator with the appropriate license as required by Regulation No. 27 of ADPC&E.

35. Any statements in the Engineering Report or Operation and Maintenance Manual that conflict with the Solid Waste Management Code, 40 CFR Part 258 (Subtitle D), and applicable laws shall not be considered authorized by the Department.

36. The Department, its employees, agents or any authorized person shall have the right to enter the property at any time for any reason as set out in the Arkansas Solid Waste Code for the purpose including but not limited to taking of samples, inspection, and any other enforcement or engineering action, without interference or delay from the permittee.

37. As an adjunct to the additional conditions listed above, the permittee is reminded that the provisons of Condition No. 1 of this permit must also be satisfied in the construction, operation and maintenance of the facility.

38. COMPOSTING FACILITY

A. Materials for composting may include yard waste and similar materials including grass clippings, leaves, brush, and tree prunings. Waste materials other than yard waste shall not be composted at the site without specific authorization from the Department.

B. Authorization for composting operations may be discontinued if nuisance or odor problems develop at the composting site.

C. Storm water runoff from the compost pad shall be routed to the Compost Facility Detention Pond. Any runoff that is not reused in the composting operation shall be routed to the Solid Waste Facility Detention Pond, or treated in an alternate manner approved in writing by ADPC&E.

D. The volume (or weight) of raw material that is added to the compost operation and of compost material that is removed from the compost site shall be monitored and recorded each operating day. The amounts in cubic yards/day (or pounds/day or tons/day on a weight basis) shall be maintained along with other records of the facility for review by authorized representatives of ADPC&E.

E. The finished compost shall be analyzed for heavy metals (Cd, Cu, Pb, Ni & Zi), pH, and total solids at least semi-annually. Test results shall be maintained in the facility Operating Record along with the results of any other tests specified in the Operation and Maintenance Manual.

F. The compost use shall not conflict with any restriction, current or future, by the Arkansas State Plant Board.

*****

ADEQ
ARKANSAS
Department of Environmental Quality

Permit Tracking Number: ARG160036
AFIN: 60-01071

NOTICE OF COVERAGE (NOC)
LANDFILL SEDIMENT POND DISCHARGE GENERAL PERMIT, ARG160000

City of Little Rock
Attn: Warren Atkins, SW Services Manager
10803 Ironton Cutoff Road
Little Rock, AR 72206

The Recertification Notice of Intent (NOI) for coverage under the above General Permit was received on February 19, 2020 and has been reviewed. The facility has been assigned Permit Tracking Number **ARG160036** and AFIN **60-01071**. Any permit-related correspondence must include these numbers. This NOC is issued to City of Little Rock in reliance upon the statements and representations made in the submittal for the following facility located in Pulaski County:

City of Little Rock Solid Waste Landfill
10803 Ironton Cutoff Road
Little Rock, AR 72206

The facility's treatment system consists of a sedimentation pond.

Compliance with all conditions and limitations of the enclosed general permit is required. Please be advised that the permit contains monitoring and reporting requirements.

Discharges allowed by the permit shall only occur at the following outfall location:

Outfall 001: Latitude 34° 38' 56.54" Longitude 92° 17' 46.93"

to receiving waters named:

unnamed tributary of Willow Springs Branch, thence to Willow Springs Branch, thence to Little Fourche Creek, thence to Fourche Creek, and thence to the Arkansas River.

Expiration Date: February 28, 2025

Bryan Leamons

_____ ___3/9/2020_____

Bryan Leamons, P.E.
Senior Operations Manager
Office of Water Quality

Issue Date

APPENDIX B

Forms

CITY OF LITTLE ROCK CLASS 4 LANDFILL
Operations Inspection Form

DESCRIPTION	INSPECTION INTERVAL	PASS	FAIL**
Surface Water System			
Drainage Ditches & Culverts	Monthly		
Berms	Monthly		
Landfill Cover System, Intermediate & Final			
Erosion	Monthly		
Ponded Water	Monthly		
Settlement	Monthly		
Vegetation	Monthly		
Facility Roads			
Safety	Monthly		
Routing	Monthly		
Condition	Monthly		
Passable Width	Monthly		
Emergency Response Equipment			
Fire Extinguisher	Test annually, check quarterly		
Communication System	Monthly		
List of Emergency Phone Numbers	Monthly		
First Aid Kits	Monthly		
Fences and Gates	Quarterly		
Waste Cell and Landfill Grid Markers	Monthly		
Survey Control Monuments	Annually		

** Explain failure on back of form.

CITY OF LITTLE ROCK LANDFILL
ROUTINE WASTE INSPECTION
WASTE COMPOSITION

COMPOSITION	PERCENT BY VOLUME (Estimated)
Food Wastes	
Paper/Cardboard	
Plastics	
Textiles/Rubber/Leather	
Dirt/Ashes/Brick	
Vegetative Waste	
Wood	
Glass	
Metals	
Household Hazardous Waste	
Tires	
Drywall	
Other Hazardous Waste	

COMMENTS:

July10, 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 May 7, 2024
AFIN 60-01071
Permit Number 0266-S4J

Dear Mr. Jackson:

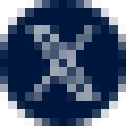
In response to your inspection of May 7, 2024, the following is a list of comments and corrective actions to be undertaken on the City of Little Rock's Class 4 Violations:

AFIN 60-01071 Permit Number 0266-S4J,

- ***Category 2, Regulation 607(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.)* – 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 Michael Marchman for his approval. There seemed to be an issue emailing the drafts on 1/22/2024 causing a spam error message of not delivering the attachments to Michael Marchman. I reached out to The Cities IT department to resolve or see if this is on our side. I also reached out on 3/18/2024 as well as 4/16/2024 to see if the drafts had been reviewed. I have attached the Class 4 draft along with the response.

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




CITY OF LITTLE ROCK
ARKANSAS