

From: Kimberly Davenport (adpce.ad)
Sent: Wednesday, August 7, 2024 12:38 PM
To: Owens, Bernard
Cc: Casey Jackson; Watkins, Glenn E.; Christopher Krou (adpce.ad); Ryan Hayden (adpce.ad); Nicholas Jones (adpce.ad); Charles Hurt (adpce.ad); Greg Banic (adpce.ad); Michael Marchman (adpce.ad)
Subject: City of Little Rock Class 1 - Q3 Inspection report - with violations
Attachments: 131316-insp.pdf

Attached:7/11/2024 - City of Little Rock Class 1 - Q3 Inspection report - with violations

Kim Davenport | Solid Waste Inspector Supervisor
Division of Environmental Quality | **Office of Land Resources**
Regulated Waste Program

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ARKANSAS
ENERGY & ENVIRONMENT



DIVISION OF
ENVIRONMENTAL QUALITY

131316

Sarah Huckabee Sanders
GOVERNOR

Shane E. Khoury
SECRETARY

8/7/2024

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

RE: Inspection conducted on July 11, 2024
AFIN 60-01071
Permit Number 0266-S1

Dear Mr. Owens,

The Arkansas Division of Environmental Quality Office of Land Resources (DEQ) conducted a routine inspection of your facility pursuant to the Arkansas Solid Waste Management Act (Arkansas Code, Annotated, § 8-6-201 *et seq.*), of 1971, as amended, the Arkansas Pollution Control & Ecology Commission Regulation 22 (Solid Waste Management), and the above-referenced permit. The inspection identified conditions at your facility which the DEQ alleges are violations. A copy of the inspection report is attached.

City of Little Rock should immediately initiate actions to correct the alleged violations cited. A written response of the corrective actions taken, or to be taken, must be submitted within thirty (30) calendar days from the date on this letter to the attention of Casey Jackson. The response may include, but is not limited to, photographs, copies of disposal receipts, records, or analytical results, as applicable. If you have any questions regarding the alleged violations, please do not hesitate to contact me at (501) 682-0832 or casey.jackson@arkansas.gov.

Sincerely,

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

Casey Jackson
Solid Waste Inspector

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

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

Site Name	City of Little Rock	County	Pulaski	AFIN	60-01071
Facility Address	10801 Ironton Cut-Off Rd. Little Rock, AR	Phone #	501-888-6751	Permit #	0266-S1
Permittee Address	10801 Ironton Cut-Off Rd. Little Rock, AR	Email Address	sowens@littlerock.gov	PDS #	131316
Date	7/11/2024	Entry Time	0934	Exit Time	1245

Operational Standards

Category 1


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

Category 2

Regulation	Item Description	Comments
422(c)	Operations in Accordance with Permit Documents	The last approved Operating Plan (OP) is dated 1996 and requires updating. (Refer to Doc #3716, dated 7/26/1996). A New draft OP was submitted 2/1/2024 (Doc #85107).
411(c)	Smallest Practical Area, Unloading Supervised, Single Working Face	
411(b)	Operations by Licensed On-site Personnel at All Times	
411(g)	Litter Control Provisions Maintained	
427	Surface Water Controls	
X	411(h)(1) Contouring Prevents Surface Water Flowing Into or Through Waste	The surface of the active area is not contoured to minimize surface water run-on or flow through the working face as evidenced by ponding observed in the active area. (Refer to Photos #1 and #2.)
X	418(a)(b) Run-on/off Control System Present and Adequate	A run-on/off control system is not in place to prevent washout of solid waste from the active portion of the landfill. (Refer to Photos #3 and #4.)
	411(h)(2) Surface Water Control Prevents Off-site Sediment Accumulation	
X	411(i) Adequate Maintenance of Intermediate/Final Cover Vegetation	Bare spots observed in the final & intermediate vegetative cover observed on the eastern slope of Cell 4. (Refer to Photos #5, #6 and #7.)
X	415(d)(3) Gas Monitoring Program	A gas remediation plan has not been submitted for Q3 (Doc#84912) & Q4 (Doc#85611) of 2023. The current facility EGM report (Second Quarter 2024 Explosive Gas Monitoring Report) indicates the issue is ongoing.
X	411(o) Leachate Leaks or Evidence of Leachate Seepage	Leachate observed emerging from the west side of cell 5 into the storm water ditch and storm water pond located west of the active area. (Refer to Photos #8, #9, #10, #11, and #12.)
	429 Leachate Collection System	

Category 3

Regulation	Item Description	Comments
X	413(a)(b) Satisfactory Daily/Alternate/Intermediate Cover	Daily/Alternate daily cover observed in the active portion of Cell 5W does not prevent exposed waste, blowing litter, or leachate. (Refer to Photos #1 & #2).
	419(a)(5) Cause Discharge/Leachate Leaving Landfill	
	411(f)(3) Depositing Waste in Standing Water Prohibited	
X	411(o) Erosion or Other Cover Defects Resulting in Exposed Refuse	Erosion on the east side slopes on cells 1 and 4. (Refer to Photos #13 and #14.)

	309(c)	Overfill/Off Lined Area						
Records								
Date of Last Annual Report	3/30/2023		Date of Last Quarterly Methane Monitoring	7/9/2024				
Date of Last Groundwater Monitoring Report	8/4/2023		Previous Quarter Waste Received	32,097.12 Tons				
Operator Name & Number	Bernard Owens - 004434		Signature of Inspector					
Exit Interview Conducted with	Bernard Owens		Method	On-Site	Date	7/11/2024	Time	1240

Division of Environmental Quality Official Photograph Sheet

Location	City of Little Rock Class 1			Permit	0266-S1	AFIN	60-01071
Photographer	Casey Jackson		<i>255</i>	Witness	Kim Davenport		
Photo #	1	Of	14	Date	7/11/2024	Time	1051
Description	Exposed waste and ponding water observed in the active portion of cell 5 west.						



Location	City of Little Rock Class 1			Permit	0266-S1	AFIN	60-01071
Photographer	Casey Jackson		<i>255</i>	Witness	Kim Davenport		
Photo #	2	Of	14	Date	7/11/2024	Time	1051
Description	Exposed waste and ponding water observed in the active portion of cell 5 west.						



Division of Environmental Quality Official Photograph Sheet

Location	City of Little Rock Class 1			Permit	0266-S1	AFIN	60-01071
Photographer	Casey Jackson	<i>055</i>		Witness	Kim Davenport		
Photo #	3	Of	14	Date	7/11/2024	Time	1037
Description	Run-on/ off controls were not present on the west side of cell 5, with erosion observed. View is east to west.						



Location	City of Little Rock Class 1			Permit	0266-S1	AFIN	60-01071
Photographer	Casey Jackson	<i>055</i>		Witness	Kim Davenport		
Photo #	4	Of	14	Date	7/11/2024	Time	1037
Description	Erosion observed with no controls in place on the west side of cell 5. View is east to west.						



Division of Environmental Quality Official Photograph Sheet

Location	City of Little Rock Class 1			Permit	0266-S1	AFIN	60-01071
Photographer	Casey Jackson		<i>css</i>	Witness	Kim Davenport		
Photo #	5	Of	14	Date	7/11/2024	Time	1135
Description	Bare spots observed in the final & intermediate vegetative cover on the eastern slope of Cell 4.						



Location	City of Little Rock Class 1			Permit	0266-S1	AFIN	60-01071
Photographer	Casey Jackson		<i>css</i>	Witness	Kim Davenport		
Photo #	6	Of	14	Date	7/11/2024	Time	1137
Description	Bare spots observed in the final & intermediate vegetative cover on the eastern slope of Cell 4 with exposed waste.						



Division of Environmental Quality Official Photograph Sheet

Location	City of Little Rock Class 1			Permit	0266-S1	AFIN	60-01071
Photographer	Casey Jackson		<i>CSS</i>	Witness	Kim Davenport		
Photo #	7	Of	14	Date	7/11/2024	Time	1138
Description	Bare spots observed in the final & intermediate vegetative cover on the eastern slope of Cell 4 with exposed waste.						
							
Location	City of Little Rock Class 1			Permit	0266-S1	AFIN	60-01071
Photographer	Casey Jackson		<i>CSS</i>	Witness	Kim Davenport		
Photo #	8	Of	14	Date	7/11/2024	Time	1105
Description	Leachate flowing from the southwest corner of cell 5 west into the stormwater ditch.						
							

Division of Environmental Quality Official Photograph Sheet

Location	City of Little Rock Class 1			Permit	0266-S1	AFIN	60-01071
Photographer	Casey Jackson		<i>css</i>	Witness	Kim Davenport		
Photo #	9	Of	14	Date	7/11/2024	Time	1105
Description	Leachate flowing from the southwest corner of cell 5 west into the stormwater ditch.						
							
Location	City of Little Rock Class 1			Permit	0266-S1	AFIN	60-01071
Photographer	Casey Jackson		<i>css</i>	Witness	Kim Davenport		
Photo #	10	Of	14	Date	7/11/2024	Time	1105
Description	Leachate flowing from the southwest corner of cell 5 west into the stormwater ditch.						
							

Division of Environmental Quality Official Photograph Sheet


Location	City of Little Rock Class 1	Permit	0266-S1	AFIN	60-01071
Photographer	Casey Jackson	<i>ESS</i>	Witness	Kim Davenport	
Photo #	11	Of	14	Date	7/11/2024
Description	Leachate observed flowing into an unlined stormwater collection area.				



Location	City of Little Rock Class 1	Permit	0266-S1	AFIN	60-01071
Photographer	Casey Jackson	<i>ESS</i>	Witness	Kim Davenport	
Photo #	12	Of	14	Date	7/11/2024
Description	Leachate observed flowing into an unlined stormwater collection area.				



Division of Environmental Quality Official Photograph Sheet

Location	City of Little Rock Class 1			Permit	0266-S1	AFIN	60-01071
Photographer	Casey Jackson	<i>055</i>		Witness	Kim Davenport		
Photo #	13	Of	14	Date	7/11/2024	Time	1141
Description	Erosion observed on the eastern slopes of cells 1 and cell 4.						
							

Location	City of Little Rock Class 1			Permit	0266-S1	AFIN	60-01071
Photographer	Casey Jackson	<i>055</i>		Witness	Kim Davenport		
Photo #	14	Of	14	Date	7/11/2024	Time	1141
Description	Erosion observed on the eastern slopes of cells 1 and cell 4.						
