



**DIVISION OF  
ENVIRONMENTAL QUALITY**

132720

Sarah Huckabee Sanders  
GOVERNOR

Shane E. Khoury  
SECRETARY

12/30/2024

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 November 26, 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](mailto: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**

|                          |                                           |                      |                       |                  |          |
|--------------------------|-------------------------------------------|----------------------|-----------------------|------------------|----------|
| <b>Site Name</b>         | City of Little Rock                       | <b>County</b>        | Pulaski               | <b>AFIN</b>      | 60-01071 |
| <b>Facility Address</b>  | 10801 Ironton Cut-Off Rd. Little Rock, AR | <b>Phone #</b>       | 501-888-6751          | <b>Permit #</b>  | 0266-S1  |
| <b>Permittee Address</b> | 10801 Ironton Cut-Off Rd. Little Rock, AR | <b>Email Address</b> | sowens@littlerock.gov | <b>PDS #</b>     | 132720   |
| <b>Date</b>              | 11/26/2024                                | <b>Entry Time</b>    | 0900                  | <b>Exit Time</b> | 1119     |

**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                                             |                                                                                                                                                                       |
|   | 411(h)(1)  | Contouring Prevents Surface Water Flowing Into or Through Waste    |                                                                                                                                                                       |
| 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 Photo #1.)                           |
|   | 411(h)(2)  | Surface Water Control Prevents Off-site Sediment Accumulation      |                                                                                                                                                                       |
|   | 411(i)     | Adequate Maintenance of Intermediate/Final Cover Vegetation        |                                                                                                                                                                       |
|   | 415        | Gas Monitoring Program                                             |                                                                                                                                                                       |
| X | 411(o)     | Leachate Leaks or Evidence of Leachate Seepage                     | Leachate 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 #2-#7.)     |
|   | 429        | Leachate Collection System                                         |                                                                                                                                                                       |
|   |            |                                                                    |                                                                                                                                                                       |

**Category 3**

|  | Regulation   | Item Description                                           | Comments |
|--|--------------|------------------------------------------------------------|----------|
|  | 413(a)(b)(c) | Satisfactory Daily/Alternate/Intermediate Cover            |          |
|  | 419(a)(5)    | Cause Discharge/Leachate Leaving Landfill                  |          |
|  | 411(f)(3)    | Depositing Waste in Standing Water Prohibited              |          |
|  | 411(o)       | Erosion or Other Cover Defects Resulting in Exposed Refuse |          |
|  | 309(c)       | Overfill/Off Lined Area                                    |          |
|  |              |                                                            |          |

**Records**

|                                   |           |                                                  |           |
|-----------------------------------|-----------|--------------------------------------------------|-----------|
| <b>Date of Last Annual Report</b> | 3/30/2023 | <b>Date of Last Quarterly Methane Monitoring</b> | 9/24/2024 |
|-----------------------------------|-----------|--------------------------------------------------|-----------|

|                                                   |                       |                                        |                |                                                                                     |            |             |      |
|---------------------------------------------------|-----------------------|----------------------------------------|----------------|-------------------------------------------------------------------------------------|------------|-------------|------|
| <b>Date of Last Groundwater Monitoring Report</b> | 8/4/2023              | <b>Previous Quarter Waste Received</b> | 31,120.98 Tons |                                                                                     |            |             |      |
| <b>Operator Name &amp; Number</b>                 | Raymond Bell - 000561 | <b>Signature of Inspector</b>          |                |  |            |             |      |
| <b>Exit Interview Conducted with</b>              | Raymond Bell          | <b>Method</b>                          | On-Site        | <b>Date</b>                                                                         | 11/26/2024 | <b>Time</b> | 1110 |

## Division of Environmental Quality Official Photograph Sheet



|                     |                                                                                                                                                                                |            |   |                |            |             |          |
|---------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|---|----------------|------------|-------------|----------|
| <b>Location</b>     | City of Little Rock                                                                                                                                                            |            |   | <b>Permit</b>  | 0266-S1    | <b>AFIN</b> | 60-01071 |
| <b>Photographer</b> | Casey Jackson                                                                                                                                                                  | <i>CSS</i> |   | <b>Witness</b> | N/A        |             |          |
| <b>Photo #</b>      | 1                                                                                                                                                                              | of         | 7 | <b>Date</b>    | 11/26/2024 | <b>Time</b> | 1005     |
| <b>Description</b>  | Run-on/ off controls were not present on the west side of cell 5, with erosion and leachate observed flowing into an unlined stormwater collection area. View is east to west. |            |   |                |            |             |          |



|                     |                                                                       |            |   |                |            |             |          |
|---------------------|-----------------------------------------------------------------------|------------|---|----------------|------------|-------------|----------|
| <b>Location</b>     | City of Little Rock                                                   |            |   | <b>Permit</b>  | 0266-S1    | <b>AFIN</b> | 60-01071 |
| <b>Photographer</b> | Casey Jackson                                                         | <i>CSS</i> |   | <b>Witness</b> | N/A        |             |          |
| <b>Photo #</b>      | 2                                                                     | of         | 7 | <b>Date</b>    | 11/26/2024 | <b>Time</b> | 1004     |
| <b>Description</b>  | Leachate observed flowing into an unlined stormwater collection area. |            |   |                |            |             |          |



## Division of Environmental Quality Official Photograph Sheet

|                                                                                      |                                                                                                 |            |   |                |            |             |          |
|--------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------|------------|---|----------------|------------|-------------|----------|
| <b>Location</b>                                                                      | City of Little Rock                                                                             |            |   | <b>Permit</b>  | 0266-S1    | <b>AFIN</b> | 60-01071 |
| <b>Photographer</b>                                                                  | Casey Jackson                                                                                   | <i>CSS</i> |   | <b>Witness</b> | N/A        |             |          |
| <b>Photo #</b>                                                                       | 3                                                                                               | <b>of</b>  | 7 | <b>Date</b>    | 11/26/2024 | <b>Time</b> | 1004     |
| <b>Description</b>                                                                   | Leachate observed flowing into an unlined stormwater collection area, continuation of photo #2. |            |   |                |            |             |          |
|    |                                                                                                 |            |   |                |            |             |          |
| <b>Location</b>                                                                      | City of Little Rock                                                                             |            |   | <b>Permit</b>  | 0266-S1    | <b>AFIN</b> | 60-01071 |
| <b>Photographer</b>                                                                  | Casey Jackson                                                                                   | <i>CSS</i> |   | <b>Witness</b> | N/A        |             |          |
| <b>Photo #</b>                                                                       | 4                                                                                               | <b>of</b>  | 7 | <b>Date</b>    | 11/26/2024 | <b>Time</b> | 1005     |
| <b>Description</b>                                                                   | Leachate observed flowing into an unlined stormwater collection area, continuation of photo #3. |            |   |                |            |             |          |
|  |                                                                                                 |            |   |                |            |             |          |

## Division of Environmental Quality Official Photograph Sheet

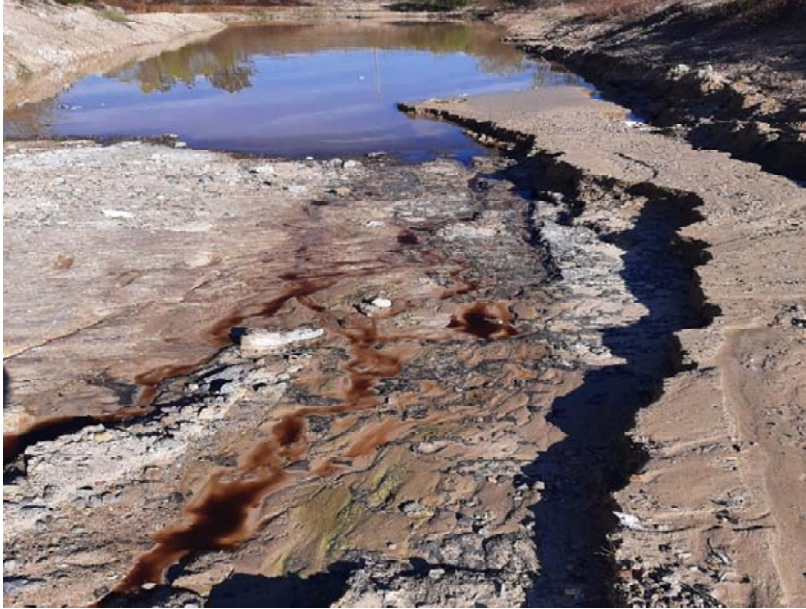
|                     |                                                                                                 |            |   |                |            |             |          |
|---------------------|-------------------------------------------------------------------------------------------------|------------|---|----------------|------------|-------------|----------|
| <b>Location</b>     | City of Little Rock                                                                             |            |   | <b>Permit</b>  | 0266-S1    | <b>AFIN</b> | 60-01071 |
| <b>Photographer</b> | Casey Jackson                                                                                   | <i>CSS</i> |   | <b>Witness</b> | N/A        |             |          |
| <b>Photo #</b>      | 5                                                                                               | <b>of</b>  | 7 | <b>Date</b>    | 11/26/2024 | <b>Time</b> | 1005     |
| <b>Description</b>  | Leachate observed flowing into an unlined stormwater collection area, continuation of photo #4. |            |   |                |            |             |          |



|                     |                                                                                                 |            |   |                |            |             |          |
|---------------------|-------------------------------------------------------------------------------------------------|------------|---|----------------|------------|-------------|----------|
| <b>Location</b>     | City of Little Rock                                                                             |            |   | <b>Permit</b>  | 0266-S1    | <b>AFIN</b> | 60-01071 |
| <b>Photographer</b> | Casey Jackson                                                                                   | <i>CSS</i> |   | <b>Witness</b> | N/A        |             |          |
| <b>Photo #</b>      | 6                                                                                               | <b>of</b>  | 7 | <b>Date</b>    | 11/26/2024 | <b>Time</b> | 1005     |
| <b>Description</b>  | Leachate observed flowing into an unlined stormwater collection area, continuation of photo #5. |            |   |                |            |             |          |



## Division of Environmental Quality Official Photograph Sheet

|                                                                                    |                                                                                                 |           |     |                |            |             |          |
|------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------|-----------|-----|----------------|------------|-------------|----------|
| <b>Location</b>                                                                    | City of Little Rock                                                                             |           |     | <b>Permit</b>  | 0266-S1    | <b>AFIN</b> | 60-01071 |
| <b>Photographer</b>                                                                | Casey Jackson                                                                                   |           | CSJ | <b>Witness</b> | N/A        |             |          |
| <b>Photo #</b>                                                                     | 7                                                                                               | <b>Of</b> | 7   | <b>Date</b>    | 11/26/2024 | <b>Time</b> | 1005     |
| <b>Description</b>                                                                 | Leachate observed flowing into an unlined stormwater collection area, continuation of photo #6. |           |     |                |            |             |          |
|  |                                                                                                 |           |     |                |            |             |          |