



DIVISION OF
ENVIRONMENTAL QUALITY

133079

Sarah Huckabee Sanders
GOVERNOR

Shane E. Khoury
SECRETARY

2/27/2024

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 February 3, 2025
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.

The 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 black ink that reads 'Casey J. Jackson'.

Casey Jackson
Solid Waste Inspector

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

ARKANSAS DEPARTMENT OF ENERGY AND ENVIRONMENT

ee.arkansas.gov | 5301 Northshore Drive, North Little Rock, AR 72118 |
501.682.0744

**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 #	133079
Date	2/3/2025	Entry Time	0930	Exit Time	1130

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	
418(a)(b)	Run-on/off Control System Present and Adequate	
411(h)(2)	Surface Water Control Prevents Off-site Sediment Accumulation	
411(i)	Adequate Maintenance of Intermediate/Final Cover Vegetation	
415	Gas Monitoring Program	
X	411(o) Leachate Leaks or Evidence of Leachate Seepage	Leachate was observed emerging from the west side of cell 5 into the storm water ditch and the unlined storm water pond located west of the active area. (Refer to Photos #1-#9.)
	429 Leachate Collection System	

Category 3

Regulation	Item Description	Comments
X	413(c) Satisfactory Interim Cover	Exposed solid waste was observed in the southeast portion of Cell 5W. This area is observed to have less than 12" of compacted soil functioning as interim cover as required. This facility is not approved to use alternate material as interim cover (shredded wood/wood chips). (Refer to Photos #10 - #12.)
	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							
Date of Last Annual Report	3/30/2023	Date of Last Quarterly Methane Monitoring	9/24/2024				
Date of Last Groundwater Monitoring Report	1/21/2025	Previous Quarter Waste Received	32,179.65 Tons				
Operator Name & Number	Raymond Bell - 000561	Signature of Inspector					
Exit Interview Conducted with	Bernard Owens	Method	On-Site	Date	2/3/2025	Time	1125

Division of Environmental Quality Official Photograph Sheet

Location	City Of Little Rock Class 1 Landfill			Permit	0226-S1	AFIN	60-01071
Photographer	Casey Jackson		<i>CSS</i>	Witness	N/A		
Photo #	1	of	12	Date	2/3/2025	Time	1049
Description	Leachate was observed flowing into an unlined stormwater collection area.						
							
Location	City Of Little Rock Class 1 Landfill			Permit	0226-S1	AFIN	60-01071
Photographer	Casey Jackson		<i>CSS</i>	Witness	N/A		
Photo #	2	of	12	Date	2/3/2025	Time	1049
Description	Leachate was observed flowing into an unlined stormwater collection area.						
							

Division of Environmental Quality Official Photograph Sheet

Location	City Of Little Rock Class 1 Landfill	Permit	0226-S1	AFIN	60-01071
Photographer	Casey Jackson	<i>CSS</i>	Witness	N/A	
Photo #	3	of	12	Date	2/3/2025
Description	Leachate was observed flowing into an unlined stormwater collection area.				



Location	City Of Little Rock Class 1 Landfill	Permit	0226-S1	AFIN	60-01071
Photographer	Casey Jackson	<i>CSS</i>	Witness	N/A	
Photo #	4	of	12	Date	2/3/2025
Description	Leachate was observed flowing into an unlined stormwater collection area.				



Division of Environmental Quality Official Photograph Sheet

Location	City Of Little Rock Class 1 Landfill	Permit	0226-S1	AFIN	60-01071
Photographer	Casey Jackson	<i>CSS</i>	Witness	N/A	
Photo #	5	of	12	Date	2/3/2025
Description	Leachate was observed flowing into an unlined stormwater collection area.				



Location	City Of Little Rock Class 1 Landfill	Permit	0226-S1	AFIN	60-01071
Photographer	Casey Jackson	<i>CSS</i>	Witness	N/A	
Photo #	6	of	12	Date	2/3/2025
Description	Leachate was observed flowing into an unlined stormwater collection area.				



Division of Environmental Quality Official Photograph Sheet

Location	City Of Little Rock Class 1 Landfill			Permit	0226-S1	AFIN	60-01071
Photographer	Casey Jackson		<i>CSS</i>	Witness	N/A		
Photo #	7	of	12	Date	2/3/2025	Time	1053
Description	Leachate was observed flowing into an unlined stormwater collection area.						



Location	City Of Little Rock Class 1 Landfill			Permit	0226-S1	AFIN	60-01071
Photographer	Casey Jackson		<i>CSS</i>	Witness	N/A		
Photo #	8	of	12	Date	2/3/2025	Time	1053
Description	Leachate was observed flowing into an unlined stormwater collection area.						



Division of Environmental Quality Official Photograph Sheet

Location	City Of Little Rock Class 1 Landfill			Permit	0226-S1	AFIN	60-01071
Photographer	Casey Jackson		<i>CSS</i>	Witness	N/A		
Photo #	9	of	12	Date	2/3/2025	Time	1054
Description	Leachate was observed flowing into an unlined stormwater collection area.						



Location	City Of Little Rock Class 1 Landfill			Permit	0226-S1	AFIN	60-01071
Photographer	Casey Jackson		<i>CSS</i>	Witness	N/A		
Photo #	10	of	12	Date	2/3/2025	Time	1045
Description	Exposed solid waste was observed in the southeast portion of Cell 5W where ADC was used. The view is Northwest to southeast.						



Division of Environmental Quality Official Photograph Sheet

Location	City Of Little Rock Class 1 Landfill			Permit	0226-S1	AFIN	60-01071
Photographer	Casey Jackson		<i>CSS</i>	Witness	N/A		
Photo #	11	of	12	Date	2/3/2025	Time	1047
Description	Exposed solid waste was observed in Cell 5W where ADC was used. The view is south to north.						
							
Location	City Of Little Rock Class 1 Landfill			Permit	0226-S1	AFIN	60-01071
Photographer	Casey Jackson		<i>CSS</i>	Witness	N/A		
Photo #	12	of	12	Date	2/3/2025	Time	1048
Description	Exposed solid waste was observed in Cell 5W where ADC was used. The view is east to west.						
