



DIVISION OF
ENVIRONMENTAL QUALITY

133698

Sarah Huckabee Sanders
GOVERNOR

Shane E. Khoury
SECRETARY

7/10/2025

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 June 16, 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 Rule, codified as 8 CAR § 60 (Solid Waste Management Rules), and the above-referenced permit. The inspection identified conditions at your facility which the DEQ alleges are violations. A copy of the inspection report is attached.

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

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 #	133698
Date	6/16/2025	Entry Time	0930	Exit Time	1121

Operational Standards

Category 1

	Citation	Description	Comments
	8 CAR § 60-417	Access Requirements	
	8 CAR § 60-411(j)	Adequate Provision for Backup Equipment	
	8 CAR § 60-423(b)	Annual Compliance Inspection by Registered Engineer	

Category 2

	Citation	Description	Comments
	8 CAR § 60-411(a)	Operations in Conformance with Permit Documents	The last approved Operating Plan (OP), dated 1996, requires updating. (Refer to Doc #3716, dated 7/26/1996). A new draft OP was submitted 2/1/2024. (Doc #85107 Refer to Doc #85107.)
	8 CAR § 60-411(c)	(Working Face)	
	8 CAR § 60-411(b)	Operations by Licensed On-site Operators at All Times	
	8 CAR § 60-411(g)	Litter Control	
	8 CAR § 60-427	Surface Water Controls	
	8 CAR § 60-411(h)(1)	Contouring Prevents Surface Water Flowing into or Through Waste	
	8 CAR § 60-418	Run-On/Run-Off Control System Present and Adequate	
	8 CAR § 60-411(h)(2)	Surface Water Control Prevents Off-site Sediment Accumulation	
	8 CAR § 60-411(i)	Final Cover Vegetation and Maintenance	
	8 CAR § 60-415(b)(3)	Gas Monitoring Program	
X	8 CAR § 60-411(o)(2)	Leachate Leaks or Evidence of Leachate Seepage	Leachate was observed emerging from the west side of cell 5 and entering the storm water ditch and the unlined stormwater collection area located west of Cell 2 and northwest of Cell 5 west. (Refer to Photos #1-#9.)
	8 CAR § 60-429	Leachate Collection System	

Category 3

	Citation	Description	Comments
X	8 CAR § 60-413(c)	Satisfactory Interim Cover	Exposed solid waste was observed in the southeast portion of Cell 5W where alternate daily cover consisting of shredded wood waste was used. This area was observed to have less than 12" of compacted soil functioning as interim cover as required. This facility is not approved to use alternate daily cover material (shredded wood/wood chips) as interim cover. (Refer to Photos #10 - #12.)
	8 CAR § 60-419(a)(5)	Allow Leachate not permitted under NPDES to Leave Landfill	
	8 CAR § 60-413(f)(3)	Depositing Waste in Standing Water is Prohibited	
	8 CAR § 60-411(o)(1)	Erosion or Other Cover Defects Resulting in Exposed Refuse	
	8 CAR § 60-309(c)	Overfill/Off Lined Area	

Records

Date of Last Annual Report	3/31/2025	Date of Last Quarterly Methane Monitoring	3/27/2025
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Date of Last Groundwater Monitoring Report	3/10/2025	Previous Quarter Waste Received	29,380.28 Tons				
Operator Name & Number	Raymond Bell - 000561	Signature of Inspector		<i>Cary J. Jolley</i>			
Exit Interview Conducted with	Bernard Owens	Method	On-Site	Date	6/16/2025	Time	1115

Division of Environmental Quality Official Photograph Sheet

Location	City of Little Rock Class 1 Landfill			Permit	0266-S1	AFIN	60-01071
Photographer	Casey Jackson		<i>CSS</i>	Witness	N/A		
Photo #	1	of	12	Date	6/16/2025	Time	1022
Description	Leachate was observed flowing from the west side slope of Cell 5 west. This view is east to west.						



Location	City of Little Rock Class 1 Landfill			Permit	0266-S1	AFIN	60-01071
Photographer	Casey Jackson		<i>CSS</i>	Witness	N/A		
Photo #	2	of	12	Date	6/16/2025	Time	1023
Description	Leachate was observed flowing down the west side slope of Cell 5 west. This view is east to west.						



Division of Environmental Quality Official Photograph Sheet



Location	City of Little Rock Class 1 Landfill			Permit	0266-S1	AFIN	60-01071
Photographer	Casey Jackson		<i>CSS</i>	Witness	N/A		
Photo #	3	of	12	Date	6/16/2025	Time	1023
Description	Leachate was observed flowing toward an unlined stormwater collection area on the west side of Cell 5 west. This view is from south to north.						



Location	City of Little Rock Class 1 Landfill			Permit	0266-S1	AFIN	60-01071
Photographer	Casey Jackson		<i>CSS</i>	Witness	N/A		
Photo #	4	of	12	Date	6/16/2025	Time	1023
Description	Leachate was observed flowing toward an unlined stormwater collection area on the west side of Cell 5 west. This view is east to west.						



Division of Environmental Quality Official Photograph Sheet

Location	City of Little Rock Class 1 Landfill			Permit	0266-S1	AFIN	60-01071
Photographer	Casey Jackson		<i>CSS</i>	Witness	N/A		
Photo #	5	of	12	Date	6/16/2025	Time	1035
Description	Leachate was observed flowing from the west side slope of Cell 5 West toward an unlined stormwater collection area. This view is from west to east.						
							
Location	City of Little Rock Class 1 Landfill			Permit	0266-S1	AFIN	60-01071
Photographer	Casey Jackson		<i>CSS</i>	Witness	N/A		
Photo #	6	of	12	Date	6/16/2025	Time	1035
Description	Leachate was observed flowing from the west side of Cell 5 West into an unlined stormwater collection area. This view is from south to north.						
							

Division of Environmental Quality Official Photograph Sheet

Location	City of Little Rock Class 1 Landfill	Permit	0266-S1	AFIN	60-01071
Photographer	Casey Jackson	<i>CSS</i>	Witness	N/A	
Photo #	7	of	12	Date	6/16/2025
Time	1037				
Description	Leachate was observed flowing from the west side of Cell 5 West into an unlined stormwater collection area. This view is from south to north.				



Location	City of Little Rock Class 1 Landfill	Permit	0266-S1	AFIN	60-01071
Photographer	Casey Jackson	<i>CSS</i>	Witness	N/A	
Photo #	8	of	12	Date	6/16/2025
Time	1037				
Description	Leachate was observed flowing from the west side of Cell 5 West into an unlined stormwater collection area.				



Division of Environmental Quality Official Photograph Sheet


Location	City of Little Rock Class 1 Landfill	Permit	0266-S1	AFIN	60-01071
Photographer	Casey Jackson	<i>CSS</i>	Witness	N/A	
Photo #	9	of	12	Date	6/16/2025
Description	Leachate was observed flowing into an unlined stormwater collection area.				



Location	City of Little Rock Class 1 Landfill	Permit	0266-S1	AFIN	60-01071
Photographer	Casey Jackson	<i>CSS</i>	Witness	N/A	
Photo #	10	of	12	Date	6/16/2025
Description	Exposed solid waste was observed in Cell 5W where Alternate Daily Cover of shredded wood waste was used as interim cover. The view is north to south.				



Division of Environmental Quality Official Photograph Sheet

Location	City of Little Rock Class 1 Landfill	Permit	0266-S1	AFIN	60-01071
Photographer	Casey Jackson	<i>CSS</i>	Witness	N/A	
Photo #	11	of	12	Date	6/16/2025
Time	0955				
Description	Exposed solid waste was observed in Cell 5W where Alernate Daily Cover of shredded wood waste was used as interim cover. The view is north to south.				
					

Location	City of Little Rock Class 1 Landfill	Permit	0266-S1	AFIN	60-01071
Photographer	Casey Jackson	<i>CSS</i>	Witness	N/A	
Photo #	12	of	12	Date	6/16/2025
Time	0955				
Description	Exposed solid waste was observed in Cell 5W where Alernate Daily Cover of shredded wood waste was used as interim cover. The view is north to south.				
