



**DIVISION OF  
ENVIRONMENTAL QUALITY**

Sarah Huckabee Sanders  
GOVERNOR

Shane E. Khoury  
SECRETARY

September 30, 2024

Electronic Mail Only

Mr. Nathan Charles, Solid Waste Service Manager  
City of Little Rock  
Public Works Solid Waste Services  
10803 Ironton Cutoff  
Little Rock, AR 72206

**Re: City of Little Rock Class 1 Landfill  
DEQ Comment on 1<sup>st</sup> Half 2024 Groundwater Monitoring Report and Appendix II Analytical  
Data  
Permit Number: 0266-S1                      AFIN: 60-01071**

Dear Mr. Charles,

The Division of Environmental Quality Office of Land Resources (DEQ) has reviewed the Facility's 1<sup>st</sup> Half 2024 Groundwater Monitoring Report and Appendix II Analytical Data and has the following comment:

The detection limits for most organic constituents have risen in recent groundwater monitoring reports, in some cases to the level of the MCL. For example, detection limits for vinyl chloride rose from 0.34ug/l to 2ug/l following the August 2021 groundwater sampling event. Rule 22.1203(h)(5) states "any PQL or MDL that is used in the statistical method shall be the lowest concentration level that can be reliably achieved within specified limits of precision and accuracy during routine laboratory operating conditions using current laboratory methods." Please ensure that the laboratory analytical methods used for these constituents comply with the above-stated requirement in future sampling events, including for the next scheduled annual Appendix II sampling event.

If you have any questions or need any additional information, please contact Aaron Baggett at (501) 682-0643 or [Aaron.Baggett@arkansas.gov](mailto:Aaron.Baggett@arkansas.gov).

Sincerely,

A handwritten signature in black ink, appearing to read 'Aaron Baggett'.

Aaron Baggett  
Professional Geologist, Division of Environmental Quality  
5301 Northshore Drive, North Little Rock, AR 72118-5317

cc: Matt Acree, P.G., Terracon  
David Jaros, P.G., Terracon  
Bill Sadler, P.G., DEQ  
Greg Banic, DEQ

**ARKANSAS DEPARTMENT OF ENERGY AND ENVIRONMENT**

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