



CITY OF HOT SPRINGS

Utilities Department

780 Adams Street

Hot Springs, Arkansas 71901

November 15, 2023

VIA Email

Leslie Allen-Daniel
Enforcement Analyst – Water Division
Arkansas Energy & Environment – Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72118-5317

**RE: City of Hot Springs Utilities
Permit No. AR0033880 / AFIN 26-00145 / CAO LIS 22-007
Manhole 1750, Gulpha Creek and Spencer Bay**

Dear Ms. Allen-Daniel,

On Monday, November 6, 2023 Hot Springs Utilities hosted Secretary Shane Khoury from the Department of Energy and Environment, Secretary Wes Ward from the Department of Agriculture and Schaefer Stanley representing the Governor's Office at the Davidson Wastewater Treatment Plant. Hot Springs Utilities provided an update on Hot Springs' Consent Administrative Orders. Crist Engineers, RJN Group, Hanson & McLaughlin and Hawkins-Weir representatives were on hand to provide information about the projects. The presentation was followed by a tour of the Davidson plant.

The following components are a brief synopsis of progress regarding the CAO with regards to the Gulpha Sewer Basin and SSOs at Manhole 1750 and affecting water quality in Gulpha Creek and Spencer Bay.

The RJN Group, Inc. has the contract for the Lower Gulpha Gravity Interceptor from Spring Street to the Gulpha Pump Station. We anticipate having the project ready for bid by the end of 2023. Below is their updated schedule.

Lower Gulpha Interceptor – RJN Group

Item No.	Begin	End	Description
1	03/22/22	09/16/22	Conceptual Design Report Submitted
2	03/22/22	09/16/22	30% Plan Submitted
3	03/22/22	01/20/23	Conceptual Design Report Final
4	03/22/22	01/20/23	60% Plan Submitted
5	01/21/23	10/10/23	90% Plan Submittal
Sub Consultants			
6	03/22/22	Complete	Crist Survey – Updated easement documents at railroad crossing.
7	03/22/22	Complete	Ace Pipe Multi-Sensor Inspection - Completed field work and submitted summary documentation.
8	03/22/22	Ongoing	Eco Environmental - Completed USFWS IPAC and correspondence with USFWS Bat Biologist for tree cutting dates. Completed the request for comments letter to SHPO.
9	04/29/22	Ongoing	Grubbs Geotechnical – City to determine if additional 11 phase 2 locations currently as contracted.
10	02/06/23	Complete	Subsurface Utility Engineering (SUE) – Badger Daylighting completed SUE of 7 locations.

Crist Engineers, Inc. has the contract for the Gulpha Pump Station Improvements. Because the bids received in July 2023 were far higher than anticipated and we were unable to negotiate satisfactory terms, the City Manager rejected the bids. This project is now combined with the Davidson Drive WWTP Improvements in hopes of attracting more bidders with competitive pricing. We advertised a Request for Qualifications for Construction Management at Risk with Guaranteed Maximum Price the weekend of October 15, 2023. We will evaluate SOQs by the end of November and we anticipate a Notice to Proceed by mid-January, 2024. The 14 months of construction will be done in coordination with the Davidson Plant Improvements Project.

Gulpha Pump Station Improvements – Crist Engineers

Item No.	Begin	End	Description
1	03/22/22	Ongoing	Engagement of professional services with Crist Engineers
		07/01/22	Conceptual Design Phase
		09/01/22	60% Design Phase
		01/01/23	90% Design Phase
		03/01/23	100% Design Phase
2	03/22/22	04/08/22	On site survey on the pump station site, planimetrics, surface features, and contour development
3	03/22/22	Ongoing	Commenced initial hydraulic evaluation of pump alternatives for pump station site. Acceptable pump manufacturers are Cornell, KSB and Flygt.
4	03/22/22	Ongoing	Design Phase Services
5	04/11/23	Ongoing	Gulpha Pump Station: ADH Approval received June 1, 2023
6	07/17/23	07/17/23	Open Bids
	08/31/23	08/31/23	Board Rejected Bids
	10/15/23	11/14/23	Advertise Request for Qualifications for CMAR & GMP
	10/25/23	Complete	Site visits to Davidson Drive WWTP and Gulpha Pump Station
	10/24/23	Complete	Information Conference
	10/31/23	11/31/23	Evaluate Statements of Qualification
7	01/15/24	01/31/24	Notice to Proceed
8	TBD	TBD	Construction Phase Services
9		11/2024	Commission Project

Hanson & McLaughlin, LLC has the engineering for the Gulpha Force Main from the Gulpha Pump Station to the Davidson Drive Wastewater Treatment Plant. Bids on the Force Main were opened on October 9, 2023. On November 7, 2023. The Hot Springs Board of Directors approved a resolution awarding the bid to the Coakley Company for Phase I of the project (24" and 30" force main from Gulpha Pump Station to Chase Place). Phase II will extend the 30" force main from Chase Place to the Davidson WWTP. Completing the force main will allow CHS to run the existing pumps at full capacity while the new pump stations is under construction.

Gulpha Force Main – Hanson Mclaughlin

Item No.	Begin	End	Description
1	03/15/22	03/31/24	Gulpha Force Main contract signed.
2	03/15/22	Complete	Surveying.
3	03/15/22	Complete	Geotechnical engineering.
4	04/08/22	Complete	Design Process.
5	04/08/22	Complete	Project Manual (specifications) preparation.
6	04/15/22	Complete	30% Plan Submittal.
7	06/01/22	Complete	60% Plan Submittal.
8	02/02/23	Complete	24-Inch Force Main Addition
9	10/01/22	Complete	100% Plan Submittal
10	09/06/23	Complete	Phase 1 Bid Phase/Procurement Services.
11	11/15/23	08/15/24	Phase 1 Construction Phase Services
12	TBD	TBD	Phase 2 Bid Phase/Procurement Services
13	TBD	TBD	Phase 2 Construction Phase /Procurement Services.

Hawkins-Weir Engineers, Inc. has the contract for the Spring Street Collection System Improvements project. This phase of the overall Gulpha Basin project will be funded with CIP funds. There are no updates to their schedule.

Spring Street Collection System Improvements – Hawkins-Weir Engineers

Item No.	Begin	End	Description
1	03/22/22	Complete	Design Phase Services Complete 11/4/2022
2	03/30/22	Complete	Survey – Completed on October 28, 2022
3	TBD	TBD	Advertising / Bidding <i>Note: This project will be advertised and bid after the WW Treatment Plant, Gulpha Pump Station, Gulpha Force Main and Lower Gulpha Interceptor projects are bid. Depending on available remaining funds, the Spring Street project may be constructed in phases.</i>
4	09/08/22	Ongoing	Permitting <ul style="list-style-type: none">• National Park Service approval received October 25, 2022.• ADH Approval received November 10, 2022• ARDOT Approval received 3/22/2023
5	TBD	TBD	Construction Services

It is to be noted that the success of any improvements in the Gulpha Basin, including pump station, gravity and force main infrastructure is directly dependent on the completion of improvements at the Davidson Drive Wastewater Treatment Plant. DEQ, along with EPA are still reviewing the construction permit for the treatment plant improvements as of today's date.

Due to the severe deterioration of the Gulpha Force Main, we reduced pump capacity at the Gulpha Pump Station to help reduce the number of overflows cause by force main failure. Only one pump is currently operating. Almost any wet weather event will result in an SSO at the pump station.

There were two SSOs reported in October for Manhole 1750 affecting the Gulpha Creek-Spencer Bay area (see data on attached pages). From October 1 through April 30, the acceptable E.Coli cfu limits will be <630 cfu.

Should you need further information, please contact me at (501)651-7730 or by email at mledbetter@cityhs.net.

Sincerely,



Monty Ledbetter
Utilities Director

Attachments: October Lab Results for MH 1750 SSO's

cc: **City of Hot Springs** - Bill Burrough, City Manager; Denny McPhate, Deputy City Manager; Harold Mauldin, Wastewater Facilities Operations Manager; Todd Piller, Capital Project Manager;
Consultants - Karl Hanson, Hanson McLaughlin; Chris Leathers, RJN Group; Craig Johnson, Crist Engineers; Elizabeth Heiles, Hawkins-Weir

Manhole 1750 - Gulpha Sewer Basin

117 Catherine Heights Road

Hot Springs, Arkansas

- Affecting Gulpha Creek and Spencer Bay

On November 18, 2022 DEQ provided a response accepting Hot Springs Utilities Revised Bacteriological Sampling and Communications Plan for SSO's. The plan states that the Water Quality Assessment testing and Fecal Coliforms are no longer needed. The plan also aligns with the contact periods as depicted in Rule 2.507 for acceptable E.Coli numbers.

Acceptable E.Coli cfu limits: **October 1 through April 30 <630 cfu**
May 1 through September 30 <126 cfu

Manhole 1750 Sanitary Sewer Overflows for October 2023

Overflow Date: 10/05/2023
End Date: 10/05/2023
Cause: Rainfall, Equipment Failure
Discharge: Approximately 99,000 gallons discharge to Gulpha Creek
Actions Taken: Environmental Cleanup, Hydro cleaned, Jet-Vac, Disinfected, Deodorized, Raked/picked up and Spread Lime

Lab Results

Sample Date:	10/5/23	Sample Date:	10/9/23	Sample Date:	10/10/23
Site No.	E. coli (cfu)	Site No.	E. coli (cfu)	Site No.	E. coli (cfu)
1	>2419.6	2	30.5	2	42
		3	22.1	3	32.4
		4	190.4	4	10.9
		5	1	5	1

Overflow Date: 10/28/2023
End Date: 11/03/2023
Cause: Rainfall, Equipment Failure
Discharge: Approximately 2,080,800 gallons discharge to Gulpha Creek
Actions Taken: Environmental Cleanup, Hydro cleaned, Jet-Vac, Disinfected, Deodorized, Raked/picked up and Spread Lime

Lab Results

Sample Date:	10/28/23	Sample Date:	10/31/23	Sample Date:	11/03/23	Sample Date:	11/06/23
Site No.	E. coli (cfu)	Site No.	E. coli (cfu)	Site No.	E. coli (cfu)	Site No.	E. coli (cfu)
1	>2419.6	2	101.4	2	35.0	2	78.4
		3	>2419.6	3	172.5	3	104.6
		4	488.4	4	26.6	4	7.4
		5	313	5	12.1	5	7.2