



CITY OF HOT SPRINGS

Utilities Department

780 Adams Street
Hot Springs, Arkansas 71901

July 15, 2021

Ms. Leslie Allen-Daniel
Enforcement Coordinator
Arkansas Energy & Environment
Department of Environmental Quality – Office of Water Quality
5301 Northshore Drive
North Little Rock, AR 72118-5317

VIA EMAIL AND CERTIFIED LETTER

RE: City of Hot Springs, Arkansas, Garland County
LIS 08-099, AFIN 26-00145 and Permit No. AR0033880

Dear Ms. Allen-Daniel:

The City of Hot Springs is in receipt of your letter dated July 2, 2021. Thank you for coordinating a virtual call between the City of Hot Springs, E&E staff, and Crist Engineers on July 14, 2021. We found the meeting helpful to understand the Department's position with the outlined requests in your letter and materialize a path forward for response.

Outlined below is our response to your letter in the order of your presentation.

1. The City of Hot Springs will engage our consultant to propose a water quality assessment plan to the Department for review, comment and approval.
 - a. The Water Quality Assessment Plan will be submitted on or before August 16, 2021.
2. Based upon comments put forth yesterday by Department staff, the City of Hot Springs will amend their current operating plan for sanitary sewer overflows occurring at manhole no. 1750.
 - a. The Revised Operating Plan will be submitted on or before August 16, 2021.

3. Revised timeline for repair and remediation for manhole no. 1750 is currently estimated at or near \$35 million and require a substantial financial commitment that must be evaluated to consider further expedition of schedule.
 - a. The revised timeline will be submitted on or before August 16, 2021.

We sincerely appreciate this consideration and look forward to working with you and Department staff.

Should you have any questions regarding this correspondence please don't hesitate to contact me at 501.651.7730.

Sincerely,
City of Hot Springs



Monty Ledbetter
Utilities Director

Cc: Bill Burrough, CHS Todd Piller, CHS
Gary Carnahan, CHS Craig Johnson, Crist

Item No.	Davidson Drive WWTP Milestone Description	Initiation Date	Completion Date
1.	Davidson Drive WWTP Professional Services: Design, Construction Administration, and Resident Project Representative	September 2020	December 2024
1.	AEE/DEQ Permit Construction and NPDES Modification Submission DEQ Review & Approval	November 2021	May 2022
2.	Construction Contract for Improvements	June 2022	June 2024
3.	Performance and Demonstration Period	June 2024	December 2024
4.	Final Compliance for WWTP Improvements	-	December 2024

Table 1: Updated Milestone Schedule Davidson Drive WWTP

Item No.	Collection System Milestone Description	SSO Mitigation Manhole No.	Initiation Date	Completion Date
1.	Hydraulic Model Update – System Wide	N/A	February 2021	February 2022
2.	East Grand Avenue Collection	10578	February 2021	December 2022
3.	Spring Street Collection (Upper Gulpha)	4117, 4118	February 2021	December 2023
4.	Lakeside Pump Station	5259,5260	February 2021	December 2023
5.	Gulpha Interceptor and Pump Station	1750	February 2021	December 2030
6.	Ridgeway Street	1754, 1755	December 2024	December 2026
7.	Southwest WWTP	13483, 13484	December 2027	December 2030
8.	Mazarn Pump Station No. 01	9250	December 2027	December 2030
9.	Hot Springs Creek	1865, 1866	December 2027	December 2030
10.	Manhole 1684	1684	December 2027	December 2030

Table 2: Updated Milestone Schedule Collection System