



CITY OF HOT SPRINGS

Utilities Department

780 Adams Street

Hot Springs, Arkansas 71901

August 16, 2021

Mr. Alan J. York, Associate Director
Ms. Leslie Allen-Daniel, Enforcement Coordinator
Arkansas Energy & Environment Office of Water Quality
5301 Northshore Drive
North Little Rock, Arkansas 72118

**RE: Permit No. AR0033880, AFIN 26-00145
Hot Springs Utilities – Request for Bacteria Sampling and a Communications Plan**

Dear Mr. York and Ms. Allen-Daniel,

In response to your letters of July 2, 2021 and August 3, 2021, thank you for your suggestions. I offer the following response.

1. **Standard Operation Procedure – Methodology for estimating the volume of SSOs.** Exhibit A (attached) is added to the SOP. I have researched methods used by numerous wastewater providers. The methodology I am proposing is widely used. Additionally, I am in the process of developing a field worksheet for estimating SSO volumes. Additionally, we will install a measuring device close to the rim of MH 1750 to assist personnel in measuring the height of the overflow plume.
2. **Standard Operation Procedure – Field Reporting.** Upstream MH 1749 is at elevation 311; MH 1750 is at elevation 310. Beginning now we will monitor MH 1749 with each SSO event.
3. **Standard Operation Procedure – Public Notification.** Hot Springs Utilities will include additional locations for the signage as suggested (see revised Exhibit B).
4. **Standard Operation Procedure – Sampling and Testing.** Hot Springs Utilities will include additional sampling and testing sites under conditions where the presence of E coli exceeds the 126 cfu/100 ml (see revised Exhibit B).

In addition to the above, we have included a proposed Water Quality Assessment (attached) fulfilling the original letter dated July 2, 2021, from Leslie Allen-Daniel.

The revised timeline for Gulpha Basin improvements is as follows:

Gulpha Basin Remediation for MH 1750				
Task	Services Description	Estimated Start Date	Estimated Finish Date	Status
1	Hydraulic Model Update	3/1/2021	7/16/2021	
1.1	Update Model with latest CHS GIS	3/1/2021	3/29/2021	Complete
1.2	Refine Grinder Pump and Pressurized Main modeling	3/30/2021	4/20/2021	Complete
1.3	Update model population and non-res flow data	5/21/2021	6/11/2021	Complete
1.4	Input data from CIP "As builds"	3/30/2021	7/16/2021	Complete
2	Model Recalibration	7/19/2021	9/20/2021	
2.1	Dry Weather Flow Calibration	7/19/2021	8/9/2021	Complete
2.2	Wet Weather Flow Calibration	8/9/2021	9/20/2021	Ongoing
3	Interim Model Update/Recal Meeting	9/23/2021	9/23/2021	Scheduled
4	Gulpha Basin Alternative Evaluation	9/27/2021	11/8/2021	Scheduled
5	Interim Gulpha Basin Alternative Evaluation Meeting	11/11/2021	11/11/2021	Scheduled
6	Final Technical Memorandum	11/12/2021	12/3/2021	Scheduled
8	Final Design	1/3/2022	1/6/2023	Scheduled
9	Permitting & Property Acquisition	1/9/2023	6/5/2023	Scheduled
10	Bidding, Award, & Construction	7/3/2023	6/3/2025	Scheduled

Sincerely,



Monty Ledbetter
Utility Director

Attachments: Exhibit A Standard Operating Procedure
Exhibit B Sampling Sites, and Public Notification (signage and CodeRED)
Exhibit C SSO Containment Plan (installed)
Water Quality Assessment from FTN

Cc: Stacie Wassell, Deputy Associate Director, DEQ, Wassell@adeq.state.ar.us
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