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December 30, 2024

Mr. Richard Healey
Enforcement Branch Manager
Arkansas Energy & Environment
Department of Environmental Quality – Office of Water Quality
5301 Northshore Drive
North Little Rock, AR 72118-5317

VIA EMAIL

RE: City of Hot Springs, Arkansas, Garland County
NPDES Permit Number: AR0033880, AFIN: 2600145
LIS No. 08-099-002
Amendment No. 002 to Consent Administrative Order
Regional Plant Improvements Extension Request

Dear Mr. Healey:

Crist Engineers, Inc. is providing professional services for the City of Hot Springs in regards with assistance between the City of Hot Springs and the Department for LIS 08-099-002.

Paragraph 1 of the Order and Agreement of the referenced CAO executed on January 4, 2022, stipulated a final compliance date of December 31, 2024, for the Regional Plant. The Regional Plant improvements were separated into four construction packages as described below:

Package B & Package C: WWTP Improvements & UV Disinfection System Improvements
Package D: WWTP Outfall (WWTP to Lake Catherine Project Boundary)
Package E: WWTP Outfall (Lake Catherine Diffuser)

Outlined below is a summary of major milestones for Package B and Package C.

Package B & Package C: WWTP Improvements & UV Disinfection System Improvements		
Current Contract Value: \$34,581,200		
Item No.	Description	Milestone Date
1.	ADEE Construction Permit Submitted	September 15 th , 2022
2.	ADEE Construction Permit Application Administratively Complete	October 21 st , 2022
3.	Solicitation of Construction Manager at Risk Firms	October 15 th & 22 nd , 2023
4.	ADEE Construction Permit Approved	February 23 rd , 2024
5.	Notice to Proceed & Contract Execution	March 19 th , 2024
6.	ARPA Compliance Notice to Proceed Deadline for ANRD Funding	March 31 st , 2024
7.	Contract Status as of November 26, 2024 Contract Time Expended: 252 Days Estimate of Completion Based on Billing: 25.34%	As of November 26 th , 2024
8.	Estimated Construction Completion Date (See Exhibit 1)	August 31 st , 2026
9.	Start-Up and Owner Commissioning	October 30 th , 2026

Table 1: Updated Milestone Schedule Regional Plant for Package B and Package C

Schedule impact items related to equipment delivery delays beyond the Owner and Contractor controls are summarized below.

Package B & Package C: WWTP Improvements & UV Disinfection System Improvements Current Contract Value: \$34,581,200 Current Estimated Completion Date: October 30th, 2026		
Item No.	Description	Estimated Delivery
1.	Electrical Switchgear continues to be long lead items and is adjusted almost monthly on delivery. Delivery estimated at 64 weeks after approved submittals	February 21 st , 2025
2.	Electric Actuated Valves Delivery	August 2025
3.	Entergy Transformer delivery is estimated at 72 weeks Alternate electrical designs are under consideration to commission equipment	May 26 th , 2026

Table 2: Updated Milestone Schedule Regional Plant Impacts for Package B and Package C

Outlined below is a summary of major milestones for Package D and Package E.

Package D & Package E: WWTP Outfall and WWTP Outfall Diffuser Current Estimated Value: \$5,650,000		
Item No.	Description	Milestone Date
1.	Construction Permit Submitted	September 15 th , 2022
2.	Construction Permit Application Administratively Complete	October 21 st , 2022
3.	Solicitation of Construction Manager at Risk Firms	October 15 th & 22 nd , 2023
4.	Construction Permit Approved	February 23 rd , 2024
5.	Estimated sell of bonds for funding	April 2025
6.	Estimated Contract Negotiation and Award	July 2025
7.	Estimated Completion Schedule	October 30 th , 2026

Table 3: Updated Milestone Schedule Regional Plant for Package D and Package E

Schedule impact items related items outside the control of the Owner and Contractor for Package D and Package E.

Package D & Package E: WWTP Outfall and WWTP Outfall Diffuser Current Estimated Value: \$5,650,000	
Item No.	Description
1.	Negotiations with Entergy to acquire an easement and permission to construct within the regulated Lake Catherine project boundary meeting are ongoing
2.	Construction in the Lake Catherine project boundary meeting is limited during lake draw down time periods from November to March, annually.

Table 4: Updated Milestone Schedule Regional Plant Impacts for Package D and Package E

Due to the delayed start date at the Regional Plant and due to long delivery times for the named electrical equipment, the City of Hot Springs respectively requests an extension of the Regional Plant projects to October 31st, 2026. Upon your review of this consideration, we are happy to be available for a meeting with your designated staff to further discuss this important matter.

Mr. Richard Healey
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Should you have any questions regarding this correspondence please don't hesitate to contact me at 501.993.2922.

Sincerely,
Crist Engineers, Inc.

Craig A. Johnson, P.E.
Vice President

Cc: **Via Email**
 Bill Burrough, CHS Todd Piller, CHS
 Gary Carnahan, CHS Monty Ledbetter, CHS
 Harold Mauldin, CHS