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June 3, 2025

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: 26-00145
LIS No. 22-007
Gulpha Basin Remediation for MH 1750

Dear Mr. Healey:

Crist Engineers, Inc. provides professional services for the City of Hot Springs in regards with assistance between the City of Hot Springs and the Department for LIS 22-007.

Paragraph 4 of the Order and Agreement of LIS No. 22-007 stipulates a final compliance date in accordance with the Gulpha Creek revised timeline submitted August 21, 2021. This letter estimated a final completion date of June 3, 2025.

Table 1 - Updated Milestone Schedule Gulpha Basin Projects provides an update and milestone schedule for the Gulpha Creek projects.

Item No.	Project Name	Milestone Description	Milestone Date	Cause for Delay
1.	Spring Street Improvements	Estimated Notice to Proceed Date	July 15, 2025	City of Hot Springs was required to raise rates and issue new municipal bonds to fund the project.
		Estimated Completion Date	July 15, 2027	
2.	Gulpha Peak Flow Pump Station	Notice to Proceed Date	February 6, 2024	Entergy (Utility Provider) must provide offsite improvements to provide power to the project and estimated transformer delivery is May 15, 2026. Arrangements are being provided for a interim power alternative due to Entergy's construction and transformer delivery constraint
		Estimated Completion Date	June 17, 2026	
3.	Gulpha Peak Flow Force Main Phase I	Notice to Proceed Date	February 5, 2024	Project Complete
		Completion Date	August 26, 2024	
4.	Gulpha Peak Force Main Phase II	Notice to Proceed Date	February 25, 2025	Project is under construction
		Estimated Completion Date	August 24, 2025	
5.	Gulpha Basin Gravity Interceptor – Phase I	Notice to Proceed Date	July 14, 2025	City of Hot Springs was required to raise rates and issue new municipal bonds to fund the project.
		Estimated Completion Date	October 17, 2026	
6.	Gulpha Basin Gravity Interceptor – Phase II, Phase III, and Phase IV	Bid Opening Date	June 16, 2025	City of Hot Springs was required to raise rates and issue new municipal bonds to fund the project.
		Estimated Notice to Proceed Date	September 15, 2025	
		Estimated Completion Date	September 15, 2027	

Table 1: Updated Milestone Schedule Gulpha Basin Projects

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Table 1 demonstrates the City's commitment to addressing the Gulpha Basin projects. Please note that the remaining three phases of the gravity interceptor improvements are scheduled to be bid on June 16, 2025. To fund these improvements, it was required for the City to increase their wastewater rates to fund an \$18 million bond in 2020 and another \$68 million bond in 2025. These bonds are repaid through the wastewater bills paid by the citizens of Hot Springs.

Although not part of LIS No.: 22-007, it is important to point out that, during the time that the Gulpha Basin improvements are being made, the City has a \$34.6 million improvement contract underway at the Davidson Drive Wastewater Treatment Plant. Additionally, funding has been provided through the bond issuance for additional treatment plant improvements and additional sewer infrastructure improvements. This large financial investment in the Hot Springs Wastewater System is a major emphasis of the citizens, the Board of Directors, and City Administration.

The City of Hot Springs respectfully requests your review and consideration to revise the milestone dates as referenced in LIS 22-007. Upon reviewing this consideration, we are happy to be available for a meeting with your designated staff to further discuss this important matter.

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