



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 8

1595 Wynkoop Street  
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Phone 800-227-8917  
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2010 MAR -9 AM 9:10

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EPA REGION VIII  
HEARING CLERK

Ref: 8ENF-W-NP

MAR - 4 2010

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

Christina Volek  
City Administrator  
City of Billings  
P.O. Box 1178  
Billings, MT 59103

Re: Findings of Violation and  
Administrative Order for  
Compliance, Docket No. CWA-08-  
2009-0031: Notice of Approval of  
CMOM Work Plan and SSO ERP

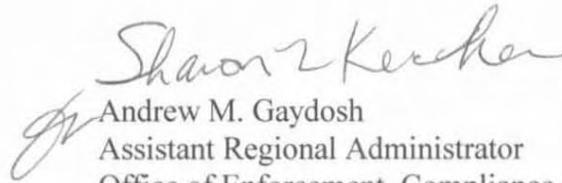
Dear Ms. Volek:

On December 21, 2009, EPA Region 8 (EPA) received the City of Billings' (City) capacity management, operation, and maintenance (CMOM) work plan required under paragraph 3 of the above-referenced order (order). The initial CMOM work plan was disapproved by EPA and a letter stating such was sent to the City on January 26, 2010. On February 17, 2010, EPA received the City's revised CMOM work plan, dated February 10, 2010. In accordance with paragraph 7 of the order, EPA hereby approves the City's revised CMOM work plan, dated February 10, 2010. Pursuant to paragraph 3 of the order, the City must commence implementation of the approved revised CMOM work plan within forty-five (45) days from receipt of this notice of approval.

Additionally, EPA has received the City's SSO emergency response plan (ERP) required under paragraph 6 of the order, and hereby approves the City's SSO ERP, dated November 17, 2009. Pursuant to paragraph 6 of the order, the City shall implement the SSO ERP within thirty (30) days from receipt of this notice of approval.

EPA appreciates the City's continued compliance with the order. If you have any questions, the most knowledgeable people on my staff are Wendy Silver, Senior Attorney, at 303-312-6637 and Amy Clark, Environmental Scientist, at 303-312-7014.

Sincerely,

  
Andrew M. Gaydosh  
Assistant Regional Administrator  
Office of Enforcement, Compliance and  
Environmental Justice

cc: Tina Artemis, Regional Hearing Clerk  
Kari Smith, Montana Department of Environmental Quality  
Alan Towleron, City of Billings