



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 8**

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Ref: 8ENF-W-NW

**SENT VIA EMAIL**  
**DIGITAL READ RECEIPT REQUESTED**

6/21/2022

7:00AM

Mr. Tim Burton, Interim City Manager  
City of Helena, Montana  
316 North Park Avenue  
Helena, Montana 59623  
[tburton@helenamt.gov](mailto:tburton@helenamt.gov)

Received by  
EPA Region VIII  
Hearing Clerk

Re: Termination of Amended Administrative Order for Compliance  
Docket No. CWA-08-2021-0018

Dear Mr. Burton:

This letter is to inform you of the U.S. Environmental Protection Agency's (EPA's) decision to terminate the Amended Administrative Order for Compliance (Amended Order) issued on June 10, 2022 to the City of Helena. As you are aware, the Amended Order withdrew paragraph 93 of the original order, thus removing the obligation of the City of Helena to submit, within 12 months after the renewal of its 2012 Montana Discharge Elimination System Permit, a written technical evaluation of the need to develop or revise local limits. The EPA has determined that the City of Helena has no remaining obligations under the Amended Order and, therefore, is terminating the Amended Order at this time. This action also serves to terminate the order as originally issued.

Please be aware that the City of Helena is still required to comply with the Clean Water Act (Act) and its implementing regulations, including section 307 of the Act, 33 U.S.C. § 1317, and 40 C.F.R. part 403. The EPA commends the City of Helena on its progress toward achieving compliance.

If you have any questions regarding this letter or other matters concerning compliance with the Act, please contact Emilio Llamozas, Environmental Engineer, at (303) 312-6407 or [llamozas.emilio@epa.gov](mailto:llamozas.emilio@epa.gov). Any questions from counsel for the City of Helena should be directed to Peggy Livingston, Senior Assistant Regional Counsel, at (303) 312-6858 or [livingston.peggy@epa.gov](mailto:livingston.peggy@epa.gov).

Sincerely,

Suzanne Bohan, Director  
Enforcement and Compliance Assurance Division

cc: Catherine Laughner, Attorney ([cathyl@bkbh.com](mailto:cathyl@bkbh.com))  
Rebecca Dockter, City Attorney ([rdockter@helenamt.gov](mailto:rdockter@helenamt.gov))  
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