



August 7, 2025

RE: Response to Comments on ACP's Programmatic Environmental Assessment

The Montana Department of Environmental Quality (DEQ) solicited public comment on the Asbestos Control Program's (ACP) Draft Programmatic Environmental Assessment (EA) from June 24, 2025 to July 28, 2025.

DEQ received one comment on June 25, 2025. The commenter was concerned that the EA's reference regarding water quality might be indicating a change in management of special wastes.

DEQ's response to the comment is found below.

The EA should not be used as a replacement to rules, regulations, or guidance received from DEQ. The aim of the EA is to assess a host of impacts that asbestos projects may have on the environment and not to alter existing industry practices. Please continue to follow current regulations.

The Administrative Rules of Montana (ARM) 17.50.1115 establishes "asbestos-contaminated material" as a special waste. Special wastes must be managed following the plan in ARM 17.50.509.