

**RESPONSE TO PUBLIC COMMENT**  
**Petroleum Cleanup General Permit (PCGP)**  
**MPDES Permit No. MTG790000**

The Montana Department of Environmental Quality (DEQ) issued Public Notice MT-25-16 on June 16, 2025. The Public Notice provided the tentative determination to issue a statewide wastewater discharge permit renewal for the General Permit for Petroleum Cleanup Operations (PCGP) under the Montana Pollutant Discharge Elimination System (MPDES) permit MTG790000. The notice included the draft Permit, Fact Sheet, and draft Environmental Assessment (EA).

The notice required that all written comments be received or postmarked by July 17, 2025, to be considered in formulation of the final determination and issuance of the permit. A public hearing was also held on July 17, 2025, to accept public comments. DEQ received comments during the public hearing from the parties in the table below. DEQ did not receive substantive written comments.

<b>Persons/Entities Submitting Substantive Comments on Public Notice Package of MPDES Permit MTG490000</b>	
No.	Commenter
1	Matthew Kent, Montana Department of Military Affairs

A synopsis of the submitted comments and DEQ's responses are included below. DEQ has considered these comments in preparation of the final permit and decision. Copies of the public hearing transcript are available from DEQ upon request. This Response to Comments is an addendum to and supersedes relevant portions of the Fact Sheet to the extent those changes are described herein.

**Comments 1 – 2 are from Matthew Kent, Montana Department of Military Affairs**

**Comment 1:**

*Fact Sheet p. 8-7, Tables:* The table on page 7, titled "Table 1. Final Effluent Limits" is sequentially Table 5. The table on page 8, referred to on page 7, section "VI. Self-Monitoring and Reporting Requirements" as Table 6 is titled "Table 2. Monitoring and Reporting Requirements."

***Response to Comment 1:***

The commentor is correct. The table on page 7 of the Fact Sheet should be titled, "Table 5. Final Effluent Limits," and the table on page 8 of the Fact Sheet should be titled, "Table 6. Monitoring and Reporting Requirements. The commentor is also correct that the table referenced on page 7 is the table found on page 8.

No changes were made to the draft permit in response to this comment.

**Comment 2:**

Permit page 4: The permit requires, under Section C. Special Conditions that best management practices (BMPs) be installed, where necessary, to control erosion. This is also mentioned in Section VII. Special Conditions of the Fact Sheet (p. 8) DEQ could make it more clear in the Fact Sheet and the Permit if an authorization under this permit allows the permittee to install riprap on a streambank because I believe this would require significantly more permitting. Additionally, did DEQ consider the environmental and economic impacts of installing sediment control BMPs potentially in a stream bank?

***Response to Comment 2:***

The commentor is correct that the installation of erosion control BMPs is not authorized by the PCGP and does not exempt permittees from applicable local, state and federal rules or requirements. To

clarify this, the following language has been added to section C. Special Conditions on p. 6 of the Permit,

“The installation of erosion controls on or near receiving streambeds or banks may require additional permitting or authorization pursuant to local, state, and federal requirements.”

DEQ considered the environmental impacts of the installation of erosion control BMPs as described on pages 7-8 of the Environmental Assessment’s “Geology and Soil Quality, Stability and Moisture” section. DEQ did not specifically consider the economic impacts of requiring erosion control BMPs where necessary but did assess Socioeconomics broadly (p.13-14 of Environmental Assessment).

No changes were made to the draft EA in response to this comment.