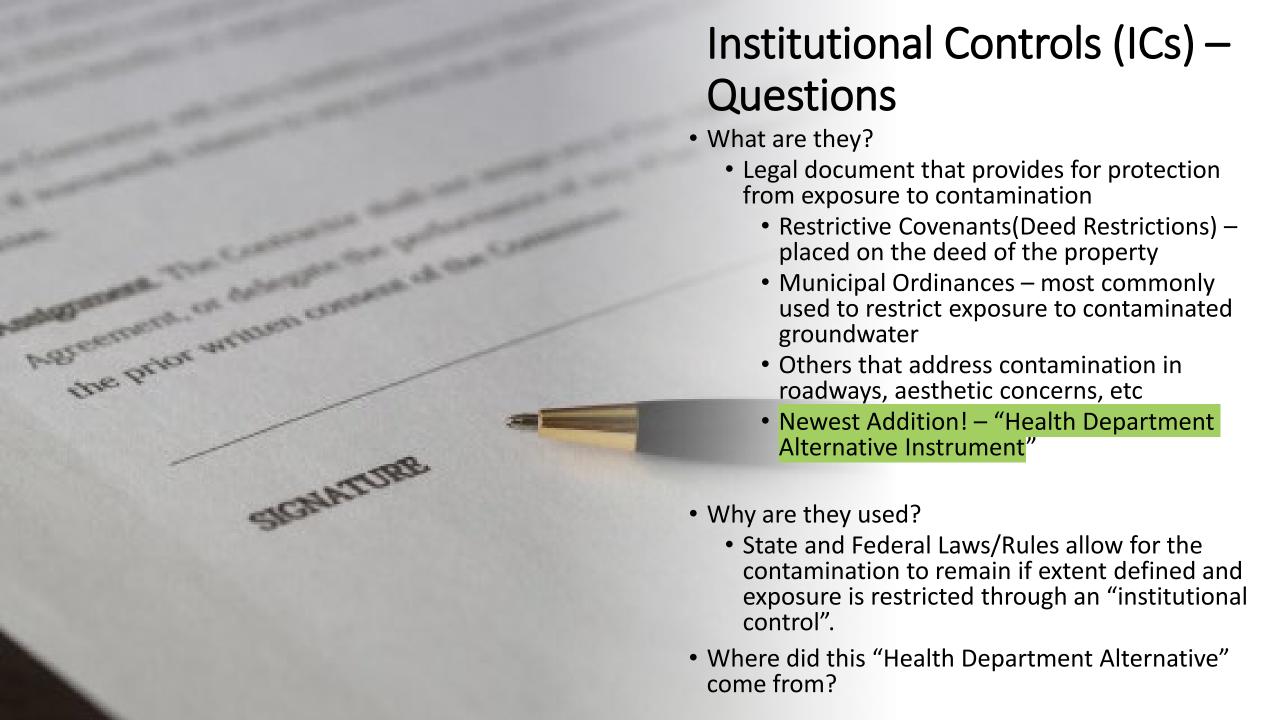
What's New in the World of Institutional Controls?

Nancy Johnson
EGLE Institutional Control Technical and
Program Support Team Lead
(IC TAPS Team)







Where did this "Health Department Alternative Instrument" come from?

- Amendments to the statutes allowed for alternative institutional controls to be proposed/implemented
- Numerous inquiries about the use of Part 127 as a "stand alone"
- EGLE assessment Part 127 could not be used by itself
 - needed to be paired with another to allow for long term reliability, enforcement, etc.

Developing an Alternative – Part 127/ local health code

- Committee formed!
- Meant to gather input of LHDs to direct generation of acceptable "alternative"

<u>Participants</u>:

Livingston County HD
District 10 HD
Kent County HD
Washtenaw County HD
Oakland County HD
Kalamazoo County HD
DEQ Drinking Water Staff
IC TAPS Reps



HD Request? Share info on groundwater contaminant plume dimension

HD input - provide a statement about using the plume information when permitting



Subsequent Results?

Generation of an "Alternative"
 Institutional Control that could be approved by EGLE to restrict GW use

 Pair Part 127 (Well Construction Code) with the enforceability of the local health code

 HD uses info provided to them when considering any well permits in/around the proposed "restricted zone"

 The "alternative" developed is considered a reliable, protective and enforceable IC

Site by site assessment for applicability



Details

- Used for restricting exposure through the groundwater route restriction
- Process must start with the IC POC All proposals must move through the IC TAPS team prior to HD contact
- Each use is considered on a sitespecific basis for appropriateness
- Team Approach PM, IC TAPS POC, Consultant, LHD
- Local health department must be in agreement (IC POC will initiate contact to explain and gauge receptiveness)
- Can be used in areas with or without municipal water





STEPS

- 1. Consultants/State PMs must start with IC Point of Contact
- 2. IC POC reachout to IC TAPS Team, contact LHD to provide explanation of process/benefit
- Consultant generates draft tech report, proposed restricted zone developed
- 4. State PM reviews, consultant performs well survey (multiple lines)/has contact with owners
- 5. Consultant provides draft report to LHD/EGLE, if HD desires review
- 6. Consultant finalizes report with well survey data (plugs any wells with owner's permission/potential reimbursement) and provides copies to EGLE and HD

STEPS (cont.)

7. HD confirms in writing to consultant/EGLE that they will use the information when reviewing well permits in/around restricted zone in the future

 POC brings to IC TAPS for final review/recommendation to District, SF, etc.

9. If District proceeds, then consultant sends copies of the final doc to the affected parcel owners. Cover letter needs to clearly state impact to owner

10. Restricted Zone mapped on Environmental Mapper - copy of report attached as PDF



Impact on the Local Health Department?

- Participate in initial meeting to explain process, background of contamination site
- Review draft summary report (if desired) and provide comments, if there are any (reports are averaging 6-8 pages, with attachments)
- Review/file Final Summary Report (associated restricted zone)
- Provide written confirmation to EGLE/consultant that the summary report information will be used when considering well permits in the area of the restricted zone

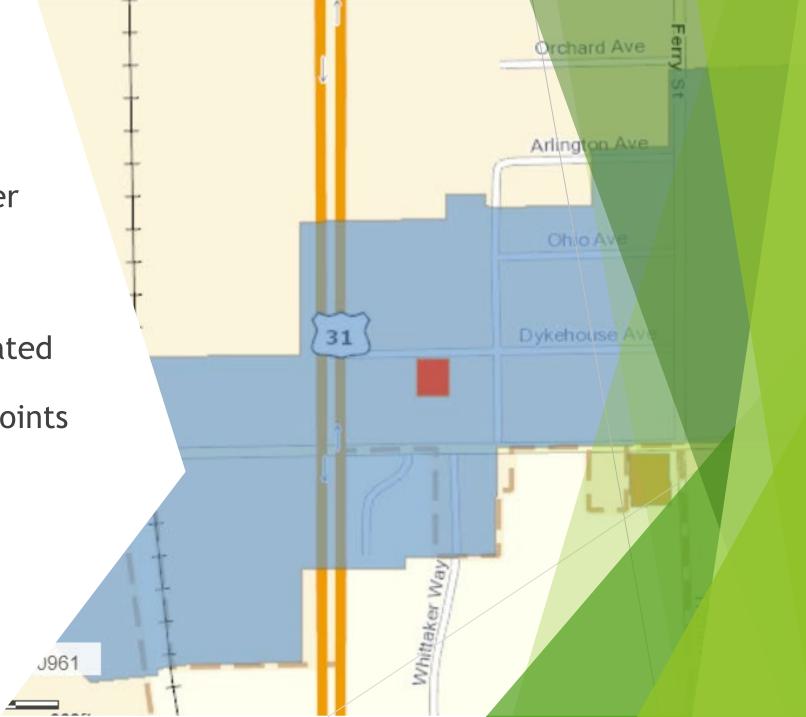


BENEFITS?

Health Department has contaminated groundwater plume mapped - have the knowledge of plume dimensions they desire

Well surveys of contaminated area occur, resulting in elimination of potential points of exposure

Public access to plume dimensions through Environmental Mapper



IC TAPS Team Point of Contacts (RRD Districts/Superfund)

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Mark Reimann	Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA, or Superfund) institutional controls	reimannm@michigan.gov	517-290- 9379
Jennifer Rezmer	Bay City District Office - Counties: Arenac, Bay, Clare, Gladwin, Huron, Iosco, Isabella, Midland, Ogemaw, Saginaw, Sanilac, Tuscola	rezmerj@michigan.gov	989-894- 6253
Sienna Cartwright	Cadillac District Office - Counties: Benzie, Grand Traverse, Kalkaska, Lake, Leelanau, Manistee, Mason, Missaukee, Osceola, Wexford	cartwrights2@michigan.gov	231-429- 1395
Krista Reed	Detroit District Office - Counties: Wayne County	reedk@michigan.gov	248-915- 0325
Heidi Pixley	Gaylord Field Office - Counties: Alcona, Alpena, Antrim, Charlevoix, Cheboygan, Crawford, Emmet, Montmorency, Oscoda, Otsego, Presque Isle, Roscommon	pixleyh@michigan.gov	989-705- 3455
Nancy Johnson	Grand Rapids District Office - Counties: Barry, Ionia, Kent, Mecosta, Montcalm, Muskegon, Newaygo, Oceana, Ottawa	johnsonn@michigan.gov	616-550- 0996
Lisa Agosta	<u>Jackson District Office</u> - Counties: Hillsdale, Jackson, Lenawee, Monroe, Washtenaw	agostal@michigan.gov	517-285- 8318
Sarah Looney	<u>Kalamazoo District Office</u> - Counties: Allegan, Berrien, Branch, Calhoun, Cass, Kalamazoo, St. Joseph, Van Buren	looneys@michigan.gov	517-388- 9016
Jaclyn Merchant	<u>Lansing District Office</u> - Counties: Clinton, Eaton, Genesee, Gratiot, Ingham, Lapeer, Livingston, Shiawassee	merchantj1@michigan.gov	517-582- 2444
Joel Asher	Marquette District Office - Counties: Alger, Baraga, Chippewa, Delta, Dickinson, Gogebic, Houghton, Iron, Keweenaw, Luce, Mackinac, Marquette, Menominee, Ontonagon, Schoolcraft	asherj@michigan.gov	906-250- 5123
Katie Noetzel	Warren District Office - Counties: Macomb, Oakland, St. Clair	noetzelk1@michigan.gov	586-753- 3808



Michigan Department of

Environment, Great Lakes, and Energy



Questions?

Nancy Johnson johnsonn@michigan.gov 616-550-0996

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