

**Summary of Department of Environmental Quality (DEQ) Actions
In Response to the
EPA Emergency Administrative Order
Updated: 01/29/2016 1743**

- **Chapter 55 “Shall cooperate with EPA for conducting sampling and other diagnostic activities”**
 - EPA Order Due Date: 01/21/2016
 - The Testing/Sampling Group has been assigned this task.
 - *It is an ongoing process.*
 - Reference: USEPA
- **Chapter 60 “Shall not switch water supplies until plans have been submitted and approved”**
 - EPA Order Due Date: 01/21/2016
 - The Public Health Group has been assigned to this task and they have received an agreement.
 - *This task has been completed.*
- **Chapter 50 “Intent to Comply Letter”**
 - EPA Order Due Date: 01/22/2016
 - The Administrative Group was assigned this task.
 - *This task was completed on 01/22/2016.*
- **Chapter 51 “Public Website posting all reports, plans, weekly status reports on progress, except Personally Identifying Information (PII)”**
 - EPA Order Due Date: 01/26/2016
 - The Administrative Group has been assigned to this task. The currently available information has been posted on the website and will be updated as more results become available.
 - *This is an ongoing task.*
- **Chapter 63 “Shall engage a panel of experts to advise and make public recommendations to the city on steps needed to mitigate the imminent and substantial endangerment to the health of persons and general operation of the city’s PWS to comply with SDWA & NPDWRs”**
 - EPA Order Due Date: 01/28/2016
 - The Administrative Group has been assigned to this task. A panel of experts had a meeting in Flint on 01/27/2016 at 3:00 p.m.
 - This is an ongoing task.
- **Chapter 52 “Is progress being made with corrosion control in the City? Respond to EPA Flint Task Force”**
 - EPA Order Due Date: 01/31/2016
 - The Public Health Group has been assigned to this task. The City of Flint is being asked to provide data.
 - *This task has been completed.*
 - EPA agreed on the dosing level for orthophosphate (01/27/2016).
 - *This task has been completed.*

- Next step: Conduct weekly status calls with Flint Water Treatment Plant.
 - *This task has been completed.*
- Review Monthly Operational Reports to ensure corrosion control treatment is appropriately maintained.
 - *Task is completed and ongoing.*
- December Monthly Operations Submitted with Dosages (1st week of January). Data expected from City on 01/29/2016.
 - *Task has been completed.*
- **Chapter 53 “Water Quality parameter measurements in distribution system”**
 - EPA Order Due Date: 01/31/2016
 - The Public Health Group has been assigned to this task.
 - Ensure City conducts/provides WQP data as required and that during their weekly status call, they discuss WQP trends/concerns.
 - *Task is completed and ongoing.*
- **Chapter 53 “All lead in water testing results for the city since January 2013 including those not used for LCR compliance”**
 - EPA Order Due Date: 01/31/2016
 - The Public Health Group has been assigned to this task.
 - *Task is completed and Ongoing.*
 - Provide to the Administrative Group so that they can vet and send to those who maintain website any lead results in DEQ files for monitoring since Jan 2013 (target 01/29/2016).
 - *Task is completed and Ongoing.*
 - Ensure ongoing monitoring results continue to be provided/posted to website.
 - *This task is ongoing.*
- **Chapter 53 “Identification of areas by zip code in the city with elevated blood levels”**
 - EPA Order Due Date: 01/31/2016
 - The Administrative Group has been assigned to coordinate with DHHS.
 - *Ongoing process.*
- **Chapter 54 “a. Existing inventory of homes with lead service lines in Excel or similar format”**
 - EPA Order Due Date: 01/31/2016
 - The Infrastructure Group and DNR GIS is assigned to this task or compiling this data. Would like to obtain a list of billing addresses that receive Flint Water to aid in mapping.
 - *This task has been completed.*
- **Chapter 54 “b. Addresses of homes that have had water service interruptions or street disturbances (e.g. water main breaks, etc.) within last year”**
 - EPA Order Due Date: 01/31/2016
 - This task has been assigned to the Infrastructure and Public Health Groups.
 - *This task is ongoing.*
 - The Infrastructure and Public Health Groups will call the City on 1/29/2016 to get update on status.
 - *Completed and awaiting information from the City of Flint.*

- **Chapter 54 “c. Addresses of currently unoccupied homes”**
 - EPA Order Due Date: 01/31/2016
 - This task has been assigned to the Infrastructure and Public Health Groups. MDEQ is working with the City of Flint Department of Public Works to acquire the data and map these locations. Would like to obtain information as to where water is turned off. State Emergency Operations Center (SEOC) will contact MSP. The information for this is not for public dissemination due to safety reasons.
 - *This is an ongoing task.*
- **Chapter 69 “Any agent, consultant or contractor used for carrying out this order shall also abide by record retention restrictions under this order”**
 - EPA Order Due Date: 01/31/2016
 - This task has been assigned to the Administrative Group. The recommended action is to comply with order and provide instruction. Assistant Attorney General (AAG) procured a Document Unit Leader.
 - *This is an ongoing task.*
 - All agents or contractors will be required to comply with the Retention Schedule of the EPA Order.
 - *This task is ongoing.*
 - Identify record retention elements and provide direction to all personnel, agents, or contractors that are or may become, involved with the Flint water incident. Also need to prepare a Documentation Unit Leader task list and identify resource(s) needed to fill the position. This was assign to the Assistant Attorney General.
 - *This task has been completed.*
- **Chapter 69 “Any agent, consultant or contractor used for carrying out this order shall also abide by record retention restrictions under this order”**
 - EPA Order Due Date: 01/31/2016
 - This task has been assigned to the Legal Team and the Administrative Group. The DOCUL will work with The AAG and Administrative Group to produce letter.
 - *This task is ongoing.*
 - It is recommended that a letter should be drafted from DEQ to the City of Flint.
 - *This task is ongoing.*
- **Chapter 59 “City shall submit to DEQ the following items listed below:”**
 - EPA Order Due Date: 02/04/2016
- **Chapter 59 “a. Submit a plan and schedule to MDEQ for designated optimal corrosion control and water quality parameters and water monitoring plans”**
 - EPA Order Due Date: 02/04/2016
 - The Public Health Group has been assigned to this task.
 - Confirm with City that they will have plans completed and submitted by 02/04/2016.
- **Chapter 59 “b. Submit a sampling plan for daily monitoring submitted in a weekly report”**
 - EPA Order Due Date: 02/04/2016
 - The Public Health Group and Infrastructure Group have been assigned to this task.

- Confirm with the City that they will have plans completed and submitted by 02/04/2016.

- **Chapter 59 “C. Submit an operations plan for the corrosion control equipment submitted in weekly format including monitoring, calibration, verification and daily monitoring of finished water corrosion control parameters”**
 - EPA Order Due Date: 02/04/2016
 - The Public Health Group have been assigned to this task.
 - Confirm with the City that they will have plans completed and submitted by 02/04/2016.

- **Chapter 61 “City must demonstrate and MDEQ must ensure the city has necessary capable and qualified personnel to perform duties in PWS”**
 - EPA Order Due Date: 02/05/2016
 - The Public Health Group has been assigned to this task.
 - *This is an ongoing task.*
 - MDEQ to get list of all operators employed at treatment plant and validate that they are properly certified, and to provide appropriate targeted training for Flint operations staff.

- **Chapter 62 “City will document and share steps to develop and implement a distribution system water quality optimization plan to MDEQ”**
 - EPA Order Due Date: 02/20/2016
 - The Public Health Group has been assigned to this, in coordination with the City of Flint.
 - *This is an ongoing task.*
 - Establish realistic due date. MDEQ to contact national drinking water organization currently working on distribution system optimization plan framework.
 - City to submit proposal by (date) and MDEQ and EPA to review/evaluate proposal.

- **Chapter 68 “After six years must notify EPA 60 calendar days prior to destruction of any data pertaining to this order”**
 - EPA Order Due Date: 01/21/2016
 - The Administrative Group and the Legal Team have been assigned to this task.
 - To ensure consistency, retain all records following General Schedule #5, specifically GS5.10. When contacted regarding disposal, all records will be put on a litigation hold for one additional year, and not destroyed. U.S. EPA will be notified when the additional one-year litigation hold is put in place.
 - *This is an ongoing task.*

- **Chapter 57 “Shall maintain chlorine residual in the distribution system in accordance to SDW and National Primary Drinking Water Regulations (NPDWR)”**
 - EPA Order Due Date: Monthly
 - The Public Health Group has been assigned to this task.
 - *This has been completed and ongoing.*
 - Regulatory requirements already in place for residual chlorine. City is required to monitor chlorine regularly and report on Monthly Operating Reports.

- Review Chlorine residual levels in weekly status calls.

- **Chapter 58 “City shall continue to add corrosion inhibitors at sufficient levels”**
 - EPA Order Due Date: Monthly
 - The Public Health Group has been assigned to this task.
 - *This is an ongoing task.*

- **Chapter 68 “Preserve records and data for six years”**
 - The Administrative Group and the Legal Team have been assigned to this.
 - *This is an ongoing task.*
 - To ensure consistency, retain all records following General Schedule #5, specifically GS5.10. When contacted regarding disposal, all records will be put on a litigation hold for one additional year, and not destroyed. Training will be conducted by DTMB Record Center to all DEQ staff to ensure consistency and understanding.
 - *This will be an ongoing task.*