AIR QUALITY DIVISION POLICY AND PROCEDURE

AQD-027 – Air Quality Division Incident Management Policy

Effective Date: January 15, 2025

ISSUE

The Michigan Department of Environment, Great Lakes, and Energy's (EGLE) Incident Management Policy, EGLE 09-001, dated June 28, 2013, requires that Incident Management Plans (IMP) be developed by each division and/or office, and updated annually to provide guidance to staff who may be involved in an incident response.

The Air Quality Division (AQD) IMP Policy AQD – 027, is developed pursuant to EGLE 09-001. This AQD IMP recognizes the need to ensure protection of the health and safety of staff during the performance of their routine duties, and in cases where the overriding priority is initial protection of public safety, i.e., during "Incident Response" as defined by EGLE Policy 09-001. This IMP also recognizes the State of Michigan's commitment to be compliant with the United States Homeland Security Presidential Directive-5, mandating the use of a single, comprehensive National Incident Management System for response to incidents of various types.

EGLE staff shall follow their respective IMP. Issues to be taken into consideration and addressed in the development of an IMP include the mission of the Department and the capabilities and safety of Department employees as they relate to incident response; the provisions of the Michigan Emergency Management Plan (MEMP); the expectations of the public and regulated community regarding the role of the Department in incident response; the provisions of the federal and state Hazardous Waste Operations and Emergency Response regulations (HAZWOPER); and the occurrence of response activities after hours or while off duty.

As directed in EGLE Policy 09-001, all IMPs must contain the following elements:

A. Delegation of authority.
B. Procedures for obtaining approval to participate in an incident response action.
C. Positions authorized to approve requests to participate in an incident response action.
D. A list of employees trained for and authorized to participate in incident response activities.
E. Procedures for coordinating with and informing the Department Emergency Management Coordinator (EMC) of participation in an incident response action.
F. Possible scenarios for response that outline the types of emergencies or hazards

likely to be encountered, criteria for determining when to participate in an incident response, examples of the type of response the division/office will provide, examples of the types of responses the division/office will not provide, and procedures for obtaining supervisory approval to participate in the response action in each scenario.

G. Identification of capabilities and typing of resources.

DEFINITIONS

Cold Zone: Area where the command post and support functions that are necessary to control the incident are located. This is also referred to as the clean zone, green zone, or support zone in other documents. (U.S. Environmental Protection Agency (EPA) Standard Operating Safety Guidelines, OSHA 29 CFR 1910.120, NFPA 472)

Complaint Response: A response by AQD staff to a complaint of emissions release received verbally, written, or by the Pollution Emergency Alert System (PEAS), that based on initial assessment, does not indicate an immediate threat to public safety. A typical complaint response may be to respond to open burning, odors, fugitive dust, or emissions fallout.

Emergency Coordination Center: EGLE maintains an Emergency Coordination Center (ECC), when activated, serves as the coordination center for EGLE, working in direct collaboration with the State Emergency Operations Center (SEOC). The ECC provides real time information related to the incident, subject matter expertise, and critical support to the incident commander.

Hazardous Substance: A substance which is or would usually be regulated or controlled regarding the amount allowed to be released into the environment.

Incident Command System: A set of personnel, policies, procedures, facilities, and equipment, integrated into a common organizational structure designed to improve emergency response operations of all types and complexities.

Incident Commander: The person responsible for all aspects of an emergency response; including quickly developing incident objectives, managing all incident operations, application of resources, as well as responsibility for all persons involved.

Incident Response: A response effort by EGLE employees to an incident involving the release of a known or suspected hazardous substance where the overriding priority is initial protection of public health and safety, including the employee.

Level D: constitutes work clothing that affords minimal protection, used for nuisance contamination only.

National Incident Management System: A structured system used in the United States to coordinate emergency preparedness and incident management among various federal, state, and local agencies.

State Emergency Operations Center: The SEOC is the emergency operations center for the State of Michigan located in Lansing, and overseen by the Michigan Department of State Police, Emergency Management and Homeland Security Division. The SEOC is staffed by members of several state agencies for decision-making and information coordination of disasters or emergencies in the State of Michigan.

POLICY

The procedures contained herein shall be followed by AQD staff to ensure protection of health and safety of staff during performance of their routine duties, and in cases where the overriding priority is initial protection of public safety, i.e., during an "Incident Response" as defined above. If an incident rises to the level of a disaster or an emergency, the Michigan Emergency Management Act and the MEMP states that EGLE is responsible for coordinating department specific response activities with the Michigan State Police Emergency Management and Homeland Security Division and that the EGLE EMC shall take the lead role in coordinating EGLE response efforts.

Note that "incident response" and "complaint response" are different for the purposes of this policy and procedure. Many or most complaints or air related notifications received by the AQD are routine and deal with smoke, fallout, nuisance dust or odors, and do not rise to the level of an "incident" as defined by EGLE Policy 09-001. These types of complaints received through EGLE's PEAS, written letters/emails, or verbally, should be handled by AQD staff according to the "Complaint Investigations" procedures located in the AQD Field Procedures Manual.

WORK ACTIVITIES

Most employees of the AQD are not authorized to perform the duties of the first responder, operations level, or hazardous materials technician or specialist as defined by the federal HAZWOPER, Title 29 of the Code of Federal Regulations (CFR), Part 1910, during an emergency situation. With the exception of the BioWatch and Sensor Unit (located in the Air Monitoring Section), division employee actions during an emergency response are typically limited to serving as a technical consultant in their area of expertise, by phone or other remote telecommunications, or at the site of the incident (cold zone only) in an advisory role. Specific exceptions to this restriction of involvement include authorized air monitoring or sampling in cold zones and BioWatch and Sensor Unit Phase I activities. This exception requires that the employee obtain supervisory chain of command approval and that these activities be performed only in situations where the use of Level D personal protective equipment (PPE) constitutes adequate protection, whereas the BioWatch and Sensor Unit

is authorized to use Level C PPE while conducting Phase I activities. The Michigan Occupational Health Standards, HAZWOPER, Michigan Administrative Code Part 432, Appendix B and the federal regulation, 29 CFR Part 1910.120 Appendix B both describe the levels of PPE. In summary, Level D constitutes work clothing that affords minimal protection, used for nuisance contamination only, while Level C utilizes various protective over-clothing and high efficiency particulate air purifying respirators. **Note:** Refer to Appendix 1, "BioWatch and Sensor Unit Incident Management Plan," for specifics regarding procedures and activities for the BioWatch and Sensor Unit of the AQD.

PROCEDURE

Table 1. Procedure Steps

Step	Who	Does What
1.	AQD Division Director or Assistant Division Director	**Procedure and positions of authority for obtaining approval to participate in an incident response action:** Final approval by either the AQD Division Director or Assistant Division Director must occur before any AQD staff responds to an incident response. AQD staff should request approval through their immediate supervisor. Supervisors should follow their chain of command to obtain approval for AQD staff to participate in an incident response action. Chain of Command: Non-Supervisory Staff, District or Unit Supervisor, Section Manager, Assistant Division Director, Division Director. **Note:** Refer to Appendix 1 for the BioWatch and Sensor Unit procedures.
2.	Employees	**Employees trained and authorized to participate in incident response activities**: See Appendix 3.
3.	District Offices	**Procedures for coordinating and informing the department EMC and the local fire department of the incident response action:** If it is determined that an emergency condition exists, the local fire department shall be contacted and requested to respond. The fire dispatch should be informed of the following: a. Staff's contact name and position. b. Phone number(s) including mobile and/or pager. c. Location of incident. d. Description of incident.

Step	Who	Does What
		e. Number and condition of injured persons. f. Any known hazards to the responding personnel. If the fire department declines to respond, the employee shall discuss the situation with his/her supervisor and determine necessary actions. If a response is made by the fire department, the employee shall await contact from the responding personnel. Once a command center is established by the on-site coordinator, the employee shall inquire as to the location of the command center and communicate this to their supervisor. A decision will be made by the District Supervisor (or back-up) whether the incident is of sufficient magnitude to immediately notify the Department EMC. The supervisor will make this notification via EGLE PEAS, 800-292-4706. The name and contact information of the Department representative(s) responding to the incident shall be provided to the PEAS on-call. If no supervisor in the back-up listing is available, the employee will need to make this determination. A list of EGLE and AQD contacts can be found in Appendix 2. **Note:** Refer to Appendix 1 for the BioWatch and Sensor Unit.
4.		**Possible scenarios for response that outline the types of emergencies or hazards likely to be encountered, criteria for determining when to participate in an incident response, examples of the type of response the division/office will provide, examples of the types of responses the division/office will not provide, and procedures for obtaining supervisory approval to participate in the response action in each scenario.** a. <u>Possible response actions for an incident involving air emissions:</u> i. The Air Monitoring Section (AMS) has specialized equipment to conduct sampling for various pollutants and parameters. Depending on the pollutant of concern, samples are

Step	Who	Does What
		collected onto a filter, cartridge, into a canister or other media, which is then sent to a laboratory for analysis. Sufficient funding and materials would be required to collect samples for laboratory analysis. Other "continuous" sampling, which produces real-time data on-site, may be possible. In response to an emergency, the AMS could set up one or more ambient air monitoring sites in cold zones if sufficient equipment is available for the pollutant of interest or could be made available to trained responders to measure: • Particulates: Particulates are collected using a filter-based method where a pre-weight and post-sampling weight is obtained at the laboratory. Three size fractions are available for particulate sampling. Total suspended particulate (TSP) matter samplers collect material that is 25 microns in diameter and smaller. Particulates can also be sampled that are 10 microns and smaller (PM10) and 2.5 microns and smaller (PM2.5). Both PM10 and PM2.5 can be sampled using filters or on a continuous frequency. • Volatile Organic Compound (VOC): VOC compounds are collected using an evacuated 6-liter canister which is then analyzed by a laboratory. Sampling frequencies can be for varying durations such as an instantaneous grab sample or 1-hour, 8-hours, or 24-hour duration. • Metals: Metals are sampled using a filter-based method for size fractions of TSP or PM10 for 24 hours or other sampling times. The filter is sent to a laboratory for analysis. Mercury: Mercury can be continuously sampled using a hand-held instrument

Step	Who	Does What
		called the "Lumex" and is very portable for field work. Several employees within the AQD are trained in the operation of the Lumex. • Bio-Terrorism Agents: A variety of biological agents, such as anthrax or the plague, can be sampled using a specialized filter-based sampler called the Portable Sampling Unit (PSU). The PSU samplers are operated by the BioWatch and Sensor Unit within the Air Monitoring Section. These filters can be collected and are then sent to the Michigan Department of Health and Human Services or other laboratory certified to handle this type of sample. **Note:** Refer to Appendix 1 for the BioWatch and Sensor Unit. • Meteorological Parameters: Continuous measurement for temperature, barometric pressure, humidity, wind speed and direction is available. ii. The Air Quality Evaluation Section's (AQE) Toxics Unit can provide information on air pollutant health hazards and health protective screening levels and can assist in the interpretation of monitored levels. The AQE's modeling group can provide meteorological forecasting support. iii. District office staff may be able to provide site or facility information such as Material Safety Data Sheets, maps/blueprints, and process equipment for an incident at an air regulated site. b. Criteria for determining when and how the division/office will respond: The AMS Manager or the BioWatch and Sensor Unit Supervisor will determine the ultimate implementation schedule for response. Generally, most non-bioterrorism ambient air monitoring

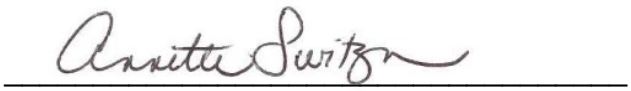
Step	Who	Does What
		equipment is not very portable and is somewhat labor intensive to set up. In addition, operating this equipment is dependent on utilizing electricity from neighboring residences or industries. Therefore, the emergency event should have an expected duration of more than three days to warrant the implementation of specialized particulate, VOC, or metals ambient air monitoring. In the event that the AMS does conduct such specialized monitoring in response to an emergency, all efforts will be made to initiate the sampling program as soon as possible if it is safe for staff to perform these functions in the cold zone. i. <u>Identification of the kind of response actions the division/office will NOT provide:</u> The AMS (excluding the BioWatch and Sensor Unit) will not respond or engage in any activity that is unsafe or violates state and federal safety or workplace regulations such as the HAZWOPER standard. Monitoring will only occur in the 'cold zone' where Level D PPE is sufficient. In general, it is unlikely the AMS will respond under the following situations: • Emergency event of expected duration less than three days. • Chemical fires or other short-term events which may be releasing high levels of hazardous substances that are best addressed by the on-scene-coordinator and response contractors in their determination and maintenance of the safe zone boundaries. • Incident where the emissions are unknown, or the appropriate equipment is unavailable. The AQD does not have the authority to evacuate an area, nor will they define an area for evacuation. Further, the AQD will not recommend emergency response action or

Step	Who	Does What
		level of PPE needed. The AQD modeling group can provide meteorological forecasting support upon request.

APPENDICES

APPENDIX 1 – BioWatch and Sensor Unit Incident Management Plan
APPENDIX 2 – Incident Response Contact Information
APPENDIX 3 – AQD Staff with Requisite Training

APPROVING AUTHORITY



Annette Switzer, Director
Air Quality Division

HISTORY

Table 2. Historical Changes

Policy No.	Action	Date	Title
AQD – 027	Original	01/2018	Air Quality Division Incident Management Plan
AQD – 027	Revised	02/2021	Same as above
AQD – 027	Revised	01/15/2025	Same as above

CONTACT / UPDATE RESPONSIBILITY

Any questions or concerns regarding this policy and procedure should be directed to Jonathan Lamb, AQD Detroit District Office, or to Malcolm Mead-O'Brien, AQD Enforcement Section.

An EGLE policy and procedure cannot establish regulatory requirements for parties outside of EGLE. This document provides direction to EGLE staff regarding the implementation of rules and laws administered by EGLE. It is merely explanatory, does not affect the rights of or procedures and practices available to the public, and does not have the force and effect of law. EGLE staff shall follow the directions contained in this document.

If you need this information in an alternate format, contact EGLE-Accessibility@Michigan.gov or call 800-662-9278.

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APPENDIX 1

BioWatch and Sensor Unit Incident Management Plan

Background:
The AQD BioWatch and Sensor Unit Detroit Field Office (DFO) is tasked by the U.S. Department of Homeland Security to maintain and operate a network of air monitors which are specifically designed to detect a bioterrorism attack directed against the people of Southeast Michigan. The filters from the network are collected by DFO staff, scanned into a dedicated server and transported to the Michigan Department of Health and Human Services (MDHHS) laboratory, which maintains dedicated staff and equipment to analyze the filters for a specific array of infectious agents. The DFO and MDHHS laboratory operate under a Memorandum of Understanding that defines the services and funding structure of the operation.

Under the BioWatch grant, the DFO is required to respond to a BioWatch Actionable Result (BAR) declared by the laboratory director, which indicates that the genetic material from a listed agent has been detected on one or more of the filters. In this situation, the Federal Bureau of Investigation (FBI), EPA, DFO staff, and numerous state and local public health officials set into motion a series of activities intended to ensure that the public health is protected from the agent.

The role of the DFO at this point is to mobilize the Phase I sampling team(s) (which include the DFO, Michigan National Guard 51st Civil Support Team, FBI, and EPA) to the site(s) where the agent was detected. The teams have the required PPE (including respirators, disposable protective clothing, gloves, etc.), sampling equipment and decontamination supplies at the ready. The purposes of this deployment are: 1) to verify the BAR determination by collecting samples from surfaces and vegetation, 2) to collect viable organisms so that the MDHHS lab can culture them and determine the most effective means of vaccination/treatment of potentially infected populations, and 3) to collect evidence for the FBI criminal investigation.

By their very nature, the biological agents involved in this program are considered hazardous substances, and thus the Phase I sampling team would be considered an Emergency Response Team and subject to the requirements of Department Policy No. 09-001. Therefore, the DFO is required to develop and maintain an IMP.

(Please note that many of the documents involved with the BioWatch program are considered For Official Use Only (FOUO) and are not for general dissemination or subject to the Freedom of Information Act. Additionally, those documents may be referenced in this IMP but will not be directly attached.)

Delegation of Authority:
The United States Department of Homeland Security authorizes the DFO to conduct all

activities necessary to manage the program, as well as to support the laboratory and the FBI through the grant.

Authorization/Communication:
The DFO Phase I response teams are deployed by the declaration of a BAR and under the guidance of the BioWatch Response Plan (FOUO document). In the event of a BAR, the supervisor of the BioWatch and Sensor Unit would notify the division director, their immediate supervisor, the supervisor of the ambient air monitoring program (in order to keep their personnel away from co-located sites that may be contaminated) and the leaders of the Phase I sampling teams. The unit supervisor has express authorization to mobilize the Phase I teams in the event of a BAR, so no further authorization is required. Furthermore, The DFO or the Division Director will notify the Michigan Department of Natural Resources, Law Enforcement Chief of the situation. (See Appendix 2 for Incident Response Contact Information)

Phase I team participants: (refer to Appendix 3)

Training: (refer to Appendix 3)

Incident command structure:
In the event of a BAR, the FBI will act as the lead agency and will appoint an incident commander. The command post is established by the BioWatch supervisor based on the wind data for the previous 36 hours.

Health and safety:
The Phase I team will follow the established Michigan National Guard 51st CST Health and Safety Plan (HASP). (FOUO document)

Authorized actions:
The field team, upon being deployed by the BioWatch and Sensor Unit supervisor, is authorized to take whatever actions required in order to achieve the goals under the most current BioWatch Response Plan and appropriate Phase I response as indicated in the applicable playbook, while complying with the HASP, including donning PPE, entering hazardous environments, etc. (FOUO documents)

APPENDIX 2

Incident Response Contact Information

Department Contacts:

Jay Eickholt, EGLE, Emergency Management Coordinator
Dana Bradt, EGLE, Health and Safety Coordinator and PEAS Administrator
Loren Curtis, RRD, Bay City District Incident Management Specialist
Laura Lambert, RRD, Jackson District Incident Management Specialist
Donovan Thomas, RRD, Kalamazoo
Sam Cameron, RRD, Lansing District Incident Management Specialist
Ashley Miller, RRD, Marquette District Incident Management Specialist
Joseph DeGrazia, RRD, Warren Incident Management Specialist
Joshua Scheels, RRD, Detroit and Warren District Incident Management Specialist
Brian Flickinger, RRD, Cadillac and Gaylord District Incident Management Specialist
David Wierzbicki, RRD, Grand Rapids District Incident Management Specialist

Air Quality Division Contacts

Annette Switzer, Division Director
Christopher Ethridge, Assistant Division Director
Jennifer Kang, Administration Section Manager
Tom Shanley, Air Quality Evaluation Section Manager
Brad Myott, Field Operations Section Manager
Susan Kilmer, Air Monitoring Section Manager
James Voss, BioWatch and Sensor Unit Supervisor
Brian Hughes, Toxics Unit Supervisor
Robert Irvine, SIP Development Unit Supervisor
Jeremy Howe, Technical Programs Unit Supervisor
Gina McCann, Bay City District Supervisor
Shane Nixon, Cadillac District and Gaylord Office Supervisor
Michael Conklin, Marquette District Supervisor
Robert Byrnes, Lansing District Supervisor
Heidi Hollenbach, Grand Rapids District Supervisor
Scott Miller, Jackson District Supervisor
Monica Brothers, Kalamazoo District Supervisor
Joyce Zhu, Warren District Supervisor
April Wendling, Detroit District Supervisor

APPENDIX 3

AQD Staff with Requisite Training BioWatch Phase I Team Participants:

John Harrison, Senior Environmental Quality Analyst

Training:

The members of the Phase I sampling teams have the following training:

- ICS 100, 200, and 700
- FEMA Center for Domestic Preparedness – Emergency Responder Hazardous Materials Technician for CBRNE (chemical, biological, radiological, nuclear and explosive) Incidents; Hazardous Materials Technician for CBRNE Incidents
- Annual eight-hour HAZWOPER refresher
- Monthly training on Phase I sampling and PPE techniques
- Annual multi-agency full scale exercises in the field under the conditions that are likely in the event of a BAR
- Annual respirator fit testing and health monitoring for all team members