



**Michigan Department of Environmental Quality**

**Annual Report of Voluntary Disclosure Submittals  
Made Pursuant to Part 148  
Environmental Audit Privilege and Immunity  
Natural Resources and Environmental Protection Act  
Public Act 451 of 1994, as Amended**

**Report Period: April 1, 2014 through March 31, 2015**

**AUTHORITY**

Section 14810(1) of the Natural Resources and Environmental Protection Act (NREPA), PA 451 of 1994, as amended, requires the Michigan Department of Environmental Quality to annually publish a report that summarizes, in general categories, the types of violations voluntarily disclosed under Part 148, Environmental Audit Privilege and Immunity, and the time projected to achieve compliance.

**[www.michigan.gov/deq](http://www.michigan.gov/deq)  
800-662-9278**

May 2015

## NOTICES OF INTENT TO CONDUCT AN ENVIRONMENTAL AUDIT

	4/1/14 Through 3/31/15	Total Through 3/31/15
<b>Notices of Intent Received</b>	75	4,259
<b>Types of Facilities Submitting Notices of Intent</b>		
➤ <b>Industrial/Business</b>	75	4,246
➤ <b>Municipal</b>	0	13
 <b>Geographic Distribution of Facilities</b>		
➤ <b>Number of Michigan Counties</b>	19	
➤ <b>Notices Submitted By County</b>		
<b>Midland</b>	<b>23</b>	
Wayne	15	
Genesee	8	
Macomb	6	
Oakland	5	
Bay	2	
Clare	2	
Iosco	2	
Ogemaw	2	
Arenac	1	
Gladwin	1	
Grand Traverse	1	
Kent	1	
Livingston	1	
Missaukee	1	
Saginaw	1	
Shiawassee	1	
St. Clair	1	
Washtenaw	1	

## **VOLUNTARY DISCLOSURES**

	4/1/14 Through 3/31/15	Total Through 3/31/15
<b>Voluntary Disclosures Received</b>	24	399
<b>Types of Facilities Submitting Disclosures</b>		
➤ <b>Industrial/Business</b>	24	399
➤ <b>Municipal</b>	0	5
<b>Geographic Distribution of Facilities</b>		
➤ <b>Number of Counties</b>	8	
➤ <b>Voluntary Disclosures Submitted By County</b>		
<b>KENT</b>	<b>1</b>	
LIVINGSTON	1	
MACOMB	3	
MIDLAND	14	
MONROE	1	
OSCODA	1	
ST. CLAIR	2	
WAYNE	1	

Non-NREPA Disclosures Reported: SPCCC (Federal), SARA Title III

**Table 1: Violations Disclosed, by Category  
April 1, 2014 through March 31, 2015**

NREPA PART & Violation Category	Time Needed to Gain Compliance				
	Compliant at Disclosure	1 to 2 Months After Disclosure	3 to 6 Months After Disclosure	7 to 9 Months After Disclosure	Over 9 Months
<b>Part 111, Hazardous Waste Management</b>					
Improper Storage	1				
Inspections	2				
Record Keeping	3				
<b>Part 31, Water Resources Protection</b>					
Employee Training	3				
Inspections	1				
Planning	7				
<b>Part 55, Air Pollution Control</b>					
Contamination	1				
Inspections	7				
Labeling	1				
No Permit	1	1			
Planning	4				
Record Keeping	7				
Reporting	15				
Rule Violation	6				
<b>Part 211, Underground Storage Tanks</b>					
Employee Training	1				
Inspections	1				
<b>TOTAL</b>	<b>61</b>	<b>1</b>			

**Examples or General Explanation of Violation Categories**

- Employee Training:** Required employee training or update was not received
- Improper Storage:** e.g. containers without lids or open containers with hazardous waste
- Inspections:** Failure to perform required inspection(s) or testing
- Labeling:** Improper label or dates missing; e.g. labeled "Used Oil" instead of "Waste Oil"
- Record Keeping:** Failure to appropriately maintain self-retained records
- Reporting:** Improper reporting of records sent to DEQ
- Planning:** Failure to develop, review or update a required plan
- No Permit:** Failure to obtain a required permit or license
- Rule Violation:** Most general; e.g. shipment did not get to disposal site within required timeframe; exceeded generator status