



# Michigan Department of Natural Resources and Environment

**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, 2009 through March 31, 2010**

## **AUTHORITY**

Section 14810(1) of the Natural Resources and Environmental Protection Act (NREPA), PA 451 of 1994, as amended, requires the Michigan Department of Natural Resources and Environment 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.

**Jennifer M. Granholm, Governor**  
**Rebecca A. Humphries, Director**  
[www.michigan.gov/dnre](http://www.michigan.gov/dnre)

## NOTICES OF INTENT TO CONDUCT AN ENVIRONMENTAL AUDIT

	4/1/09 Through <u>3/31/10</u>	Total Through <u>3/31/10</u>
Notices of Intent Received	99	3,870
Types of Facilities Submitting Notices of Intent		
➤ Industrial/Business	99	3,868
➤ Municipal	0	12
Geographic Distribution of Facilities		
➤ Number of Counties	26	
➤ Notices Submitted By County		
Midland	21	
Oakland	16	
Genesee	13	
Wayne	9	
Macomb	7	
Bay	3	
Ingham	3	
Muskegon	3	
Saginaw	3	
Berrien	2	
Kent	2	
Marquette	2	
Otsego	2	
Alcona	1	
Allegan	1	
Antrim	1	
Eaton	1	
Grand Traverse	1	
Hillsdale	1	
Huron	1	
Jackson	1	
Lenawee	1	
Mason	1	
Osceola	1	
St. Clair	1	
Washtenaw	1	

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## VOLUNTARY DISCLOSURES

	<u>4/1/09 Through 3/31/10</u>	<u>Total Through 3/31/10</u>
Voluntary Disclosures Received	36	302
Types of Facilities Submitting Disclosures		
➤ Industrial/Business	18	298
➤ Municipal	0	4
Geographic Distribution of Facilities		
➤ Number of Counties	15	
➤ Voluntary Disclosures Submitted By County		
Midland	12	
Kent	4	
Wayne	4	
Macomb	3	
Marquette	2	
Muskegon	2	
Allegan	1	
Hillsdale	1	
Huron	1	
Jackson	1	
Lenawee	1	
Marquette	1	
Oakland	1	
St. Clair	1	
St. Joseph	1	

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Non-NREPA Disclosures Reported:

SPCCC (Federal)

Part 138, Medical Waste of Public Health Code, PA 368 of 1978, as amended  
Fire Prevention Code, Public Act 207 of 1941

**Table 1: Violations Disclosed, by Category  
April 1, 2009 through March 31, 2010**

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	Unknown
<b>Part 111, Hazardous Waste Management</b>					
Employee Training	1	17			
Improper Storage	31	93			
Inspections	3				
Labeling	17	123			
Planning	2	1			
Record Keeping	10	21			
Reporting		1			
Rule Violation	12	166	1		
<b>Part 31, Water Resources Protection</b>					
Contamination	1			9	
Employee Training	1				
No Permit	2	13			
Planning	7	6			
Record Keeping		2			
Rule Violation	2	9			
<b>Part 55, Air Pollution Control</b>					
Employee Training	2				
Improper Storage	1				
No Permit	1	2		7	
Planning	1				
Record Keeping	17	10			
Reporting	12				
Rule Violation	2	1			
<b>Part 121, Liquid Industrial Wastes</b>					
Reporting	1				
<b>Part 167, Used Oil</b>					
Improper Storage	1				
<b>Part 201, Environmental Remediation</b>					
Contamination				9	
<b>Part 631, Reclamation of Mining Lands</b>					
Contamination				9	
<b>TOTAL</b>	127	465	1	34	

**Examples or General Explanation of Violation Categories**

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