



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, 2011 through March 31, 2012

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.

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Governor Rick Snyder
Director Dan Wyant

NOTICES OF INTENT TO CONDUCT AN ENVIRONMENTAL AUDIT

	<u>4/1/11 Through 3/31/12</u>	<u>Total Through 3/31/12</u>
Notices of Intent Received	82	4,051
Types of Facilities Submitting Notices of Intent		
➤ Industrial/Business	81	4,048
➤ Municipal	1	13
Geographic Distribution of Facilities		
➤ Number of Counties	15	
➤ Notices Submitted By County		
Bay	2	
Genesee	11	
Huron	1	
Ingham	3	
Ionia	1	
Kent	3	
Macomb	8	
Midland	21	
Monroe	1	
Oakland	13	
Saginaw	3	
St. Clair	1	
Schoolcraft	1	
Wayne	12	
Wexford	1	

VOLUNTARY DISCLOSURES

	<u>4/1/11 Through 3/31/12</u>	<u>Total Through 3/31/11</u>
Voluntary Disclosures Received	20	340
Types of Facilities Submitting Disclosures		
➤ Industrial/Business	20	335
➤ Municipal	0	5
Geographic Distribution of Facilities		
➤ Number of Counties	7	
➤ Voluntary Disclosures Submitted By County		
Midland		8
Wayne		5
Macomb		3
Kent		1
Oakland		1
Shiawassee		1
St. Clair		1

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, 2011 through March 31, 2012**

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
Part 111, Hazardous Waste Management					
Employee Training	2				
Improper Storage	11				
Inspections	1				
Labeling	15				
Record Keeping	14				
Reporting	8	1			
Rule Violation	19		2		
Part 31, Water Resources Protection					
Contamination	1				
Employee Training	1				
Record Keeping	4				
Planning	3		1		
Rule Violation	3	3			1
Part 55, Air Pollution Control					
Employee Training	1				
Inspections	28				
No Permit	1		1		
Planning	2				
Record Keeping	13				
Reporting	2				
Rule Violation	6		3		
Part 115, Solid Waste Management					
Record Keeping	1				
Part 121, Liquid Industrial Wastes					
Contamination	1			1	
Labeling	3				
Improper Storage	1				
TOTAL	141	4	7	1	1

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 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; i.e. shipment did not get to disposal site within required timeframe; exceeded generator status