



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, 2012 through March 31, 2013

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
Governor Rick Snyder
Director Dan Wyant

NOTICES OF INTENT TO CONDUCT AN ENVIRONMENTAL AUDIT

| | <u>4/1/12 Through 3/31/13</u> | <u>Total Through 3/31/13</u> |
|--|---------------------------------------|--------------------------------------|
| Notices of Intent Received | 59 | 4,110 |
| Types of Facilities Submitting Notices of Intent | | |
| ➤ Industrial/Business | 59 | 4,107 |
| ➤ Municipal | 0 | 13 |
| Geographic Distribution of Facilities | | |
| ➤ Number of Michigan Counties | 17 | |
| • Number of Out of State Notices | 1 | |
| ➤ Notices Submitted By County | | |
| Bay | 3 | |
| Branch | 1 | |
| Eaton | 2 | |
| Genesee | 3 | |
| Hillsdale | 1 | |
| Huron | 1 | |
| Ingham | 1 | |
| Jackson | 1 | |
| Lucas, OH | 1 | |
| Macomb | 4 | |
| Midland | 16 | |
| Muskegon | 1 | |
| Oakland | 5 | |
| Ottawa | 2 | |
| Saginaw | 4 | |
| St. Clair | 1 | |
| Washtenaw | 1 | |
| Wayne | 11 | |

VOLUNTARY DISCLOSURES

| | <u>4/1/12 Through 3/31/13</u> | <u>Total Through 3/31/13</u> |
|---|---------------------------------------|--------------------------------------|
| Voluntary Disclosures Received | 17 | 357 |
| Types of Facilities Submitting Disclosures | | |
| ➤ Industrial/Business | 17 | 352 |
| ➤ Municipal | 0 | 5 |
| Geographic Distribution of Facilities | | |
| ➤ Number of Counties | 10 | |
| ➤ Voluntary Disclosures Submitted By County | | |
| Midland | | 8 |
| Eaton | | 1 |
| Hillsdale | | 1 |
| Huron | | 1 |
| Lenawee | | 1 |
| Lucas, OH | | 1 |
| Macomb | | 1 |
| Monroe | | 1 |
| Ottawa | | 1 |
| Washtenaw | | 1 |

Non-NREPA Disclosures Reported:
SPCCC (Federal), SARA Title III
Public Health Code, Public Act 368 of 1978, Part 54A, LEAD ABATEMENT

**Table 1: Violations Disclosed, by Category
April 1, 2012 through March 31, 2013**

| 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 | | | | | |
| Improper Storage | 7 | | | | |
| Labeling | 7 | | | | |
| Record Keeping | 2 | | | | |
| Reporting | 2 | | | | |
| Rule Violation | 3 | | | | |
| Part 31, Water Resources Protection | | | | | |
| No Permit | | 1 | | | |
| Rule Violation | 1 | 1 | | | |
| Part 55, Air Pollution Control | | | | | |
| Record Keeping | 2 | | | | |
| Reporting | 4 | 3 | | | |
| Rule Violation | 1 | | | | |
| Part 121, Liquid Industrial Waste | | | | | |
| Labeling | | 2 | | | |
| Rule Violation | 1 | | | | |
| Part 211, Underground Storage Tanks | | | | | |
| Reporting | | | 2 | | |
| Rule Violation | | | | 1 | |
| TOTAL | 30 | 7 | 2 | 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