



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, 2013 through March 31, 2014**

**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)  
**Governor Rick Snyder**  
**Director Dan Wyant**

## NOTICES OF INTENT TO CONDUCT AN ENVIRONMENTAL AUDIT

	<u>4/1/13 Through 3/31/14</u>	<u>Total Through 3/31/14</u>
Notices of Intent Received	74	4,184
Types of Facilities Submitting Notices of Intent		
➤ Industrial/Business	74	4,181
➤ Municipal	0	0
Geographic Distribution of Facilities		
➤ Number of Michigan Counties	21	
➤ Notices Submitted By County		

Bay	2
Clare	1
Genesee	3
Hillsdale	1
Ingham	2
Kalamazoo	1
Kent	4
Lenawee	1
Livingston	1
Macomb	10
Midland	20
Monroe	1
Oakland	7
Oceana	1
Ogemaw	3
Oscoda	1
Ottawa	1
Saginaw	1
St. Clair	1
Van Buren	1
Wayne	11

## VOLUNTARY DISCLOSURES

	4/1/13 Through <u>3/31/14</u>	Total Through <u>3/31/14</u>
Voluntary Disclosures Received	18	375
Types of Facilities Submitting Disclosures		
➤ Industrial/Business	18	375
➤ Municipal	0	5
Geographic Distribution of Facilities		
➤ Number of Counties	10	
➤ Voluntary Disclosures Submitted By County		
CLARE		1
KENT		2
MACOMB		1
MIDLAND		6
MUSKEGON		1
OAKLAND		1
OGEMAW		1
ST. CLAIR		1
WAYNE		3
VANBUREN		1

**Table 1: Violations Disclosed, by Category  
April 1, 2013 through March 31, 2014**

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>					
Contamination	1				
Employee Training	4				
Improper Storage	28				
Inspection	1				
Labeling	23				
Planning	1				
Record Keeping	21	1			
Rule Violation	35				
<b>Part 31, Water Resources Protection</b>					
Contamination	6				
Employee Training	1				
Improper Storage	1				
No Permit	1				
Planning	18	1			
Record Keeping	5	1			
Reporting	1				
<b>Part 55, Air Pollution Control</b>					
Inspections	6	52	4		
Record Keeping	4	1	8		
No Permit			1		
Planning			4		
Reporting	2				
Rule Violation	12	159	24		
<b>Part 121, Liquid Industrial Waste</b>					
Contamination	2				
Record Keeping	2				
Rule Violation	3				
<b>Part 211, Underground Storage Tanks</b>					
Contamination		1			
Rule Violation	3				
<b>TOTAL</b>	<b>181</b>	<b>216</b>	<b>41</b>		

**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) or testing
- 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