



Michigan Department of Environmental Quality

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Governor Jennifer M. Granholm

Director Steven E. Chester

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**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, 2005 through March 31, 2006

**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.

## NOTICES OF INTENT TO CONDUCT AN ENVIRONMENTAL AUDIT

	<u>4/1/05 Through 3/31/06</u>	<u>Total Through 3/31/06</u>
Notices of Intent Received	232	3291
Types of Facilities Submitting Notices of Intent		
➤ Industrial/Business	232	3288
➤ Municipal	0	3
Geographic Distribution of Facilities		
➤ Number of Counties	19	
➤ Notices Submitted By County		
Macomb County	55	
Wayne County	55	
Washtenaw County	53	
Monroe County	13	
Oakland County	12	
Midland County	15	
Genesee County	9	
St. Clair County	4	
Ingham County	3	
Kent County	3	
Calhoun County	2	
Bay County	1	
Berrien County	1	
Kalamazoo County	1	
Lenawee County	1	
Livingston County	1	
Marquette County	1	
Mecosta County	1	
Saginaw County	1	

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## VOLUNTARY DISCLOSURES

	<u>4/1/05 Through 3/31/06</u>	<u>Total Through 3/31/06</u>
Voluntary Disclosures Received	22	176
Types of Facilities Submitting Disclosures		
➤ Industrial/Business	22	175
➤ Municipal	0	1
Geographic Distribution of Facilities		
➤ Number of Counties	6	
➤ Voluntary Disclosures Submitted By County		
Midland County	8	
Wayne County	5	
Macomb County	4	
Oakland County	3	
Calhoun County	1	
Genesee County	1	

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\* Non-NREPA Disclosures Reported:  
Public Act 207 of 1941, Michigan Fire Prevention Code  
Public Act 368 of 1978, Medical Waste, Public Health Code  
CERCLA, SARA Title III (Federal)

**Table 1: Violations Disclosed, by Category  
April 1, 2005 through March 31, 2006.**

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 After Disclosure
<b>Part 111, Hazardous Waste Management</b>					
Employee Training	6				
Improper Storage	11	2			
Inspections	8				
Labeling	14	1			
Planning	1				
Record Keeping	27	1			
Reporting	4				
Rule Violation	5				
<b>Part 31, Water Resources Protection</b>					
Employee Training			1		
Inspections	5				
Planning	5	2			
Record Keeping	1				
Rule Violation	3	2			
<b>Part 55, Air Pollution Control</b>					
No Permit		1	2		
Planning	1				
Record Keeping	20	5			
Reporting	1				
<b>Part 121, Liquid Industrial Wastes</b>					
Record Keeping	1				
<b>Part 211, Underground Storage Tank</b>					
Inspections	1				
<b>TOTAL</b>	<b>114</b>	<b>14</b>	<b>3</b>	<b>0</b>	<b>0</b>

**Examples or General Explanation of Violation Categories**

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