



Michigan Department of Environmental Quality

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Governor Jennifer M. Granholm

Director Steven E. Chester

**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, 2008 through March 31, 2009

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

	4/1/08 Through <u>3/31/09</u>	Total Through <u>3/31/09</u>
Notices of Intent Received	108	3,771
Types of Facilities Submitting Notices of Intent		
➤ Industrial/Business	99	3,759
➤ Municipal	9	12
Geographic Distribution of Facilities		
➤ Number of Counties	25	
➤ Notices Submitted By County		
Wayne	20	
Genesee	19	
Oakland	18	
Midland	11	
Kent	6	
Ingham	4	
Washtenaw	4	
Bay	3	
Macomb	3	
Saginaw	3	
Allegan	2	
Eaton	2	
Barry	1	
Berrien	1	
Hillsdale	1	
Iron	1	
Lenawee	1	
Hillsdale	1	
Manistee	1	
Monroe	1	
Montmorency	1	
Oceana	1	
Ottawa	1	
St. Joseph	1	
Van Buren	1	

VOLUNTARY DISCLOSURES

	<u>4/1/08 Through 3/31/09</u>	<u>Total Through 3/31/09</u>
Voluntary Disclosures Received	21	266
Types of Facilities Submitting Disclosures		
➤ Industrial/Business	18	262
➤ Municipal	3	4
Geographic Distribution of Facilities		
➤ Number of Counties	9	
➤ Voluntary Disclosures Submitted By County		
Midland	8	
Wayne	4	
Oakland	2	
Washtenaw	2	
Allegan	1	
Berrien	1	
Macomb	1	
Manistee	1	
Montmorency	1	

Non-NREPA Disclosures Reported:

SPCCC (Federal)

Part 138, Medical Waste of Public Health Code, PA 368 of 1978, as amended
Federal Clean Air Act and supporting Federal Regulations

**Table 1: Violations Disclosed, by Category
April 1, 2008 through March 31, 2009**

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
Part 111, Hazardous Waste Management					
Employee Training	2	1			
Improper Storage	5	2	1	5	
Inspections	2		1		
Labeling	8	1	1	2	
Record Keeping	1	2		1	
Reporting		1	1		
Rule Violation	6		1	1	
Part 31, Water Resources Protection					
Planning	3				
Record Keeping	1				
Rule Violation	1				
Part 55, Air Pollution Control					
No Permit	1	4			
Permit Violation	1				
Record Keeping	2	6	2		
Reporting	1		2		1
Rule Violation	7	5	1		
TOTAL	41	22	10	9	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
Permit Violation:	Reported Violation of Permit Condition
Rule Violation:	Most general; i.e. shipment did not get to disposal site within required timeframe; exceeded generator status