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, 2010 through March 31, 2011

AUTHORITY

Section 14810(1) of the Natural Resources and Environmental Protection Act (NREPA), PA 451 of 1994, as amended, requires the Michigan Department of Natural Resources and Environment 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.

Rick Snyder, Governor
Dan Wyant, Director
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NOTICES OF INTENT TO CONDUCT AN ENVIRONMENTAL AUDIT

	4/1/10 Through 3/31/11	Total Through 3/31/11
Notices of Intent Received	99	3,969
Types of Facilities Submitting Notices of Intent		
➢ Industrial/Business	99	3,967
➢ Municipal	0	12
Geographic Distribution of Facilities		
➢ Number of Counties	18	
➢ Notices Submitted By County		
Midland	23	
Wayne	20	
Oakland	10	
Macomb	9	
Genesee	9	
Saginaw	4	
Bay	4	
Alcona	4	
Ingham	3	
St. Clair	2	
Oscoda	2	
Montmorency	2	
Alpena	2	
Washtenaw	1	
Shiawassee	1	
Ottawa	1	
Kent	1	
Huron	1	

VOLUNTARY DISCLOSURES

	4/1/10 Through 3/31/11	Total Through 3/31/11
Voluntary Disclosures Received	18	320
Types of Facilities Submitting Disclosures		
➢ Industrial/Business	17	315
➢ Municipal	1	5
Geographic Distribution of Facilities		
➢ Number of Counties	13	
➢ Voluntary Disclosures Submitted By County		
Wayne	3	
Alcona	2	
Alpena	2	
Oakland	2	
Bay	1	
Berrien	1	
Hillsdale	1	
Ingham	1	
Iosco	1	
Macomb	1	
Montmorency	1	
Oscoda	1	
Washtenaw	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, 2010 through March 31, 2011

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	1	3			
Improper Storage	1	46			
Inspections		1			
Labeling	1	83			
Planning		1			
Record Keeping	1	3			
Rule Violation		160			
Part 31, Water Resources Protection					
Contamination		1			
Employee Training	1				
No Permit		6			
Reporting		1			
Planning	2	9			
Rule Violation	1	7			
Part 55, Air Pollution Control					
Employee Training	1				
Improper Storage		2			
No Permit		11	1		
Record Keeping	5	4			
Reporting		1			
Rule Violation	8	4			
Part 115, Solid Waste Management					
Employee Training		1			
Part 121, Liquid Industrial Wastes					
Improper Storage		8			
No Permit		3			
Record Keeping		2			
TOTAL	22	357	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