



Local Roots >> **Global Reach**

Compliance Obligations during the COVID-19 Crisis - A Legal Perspective

Paul Collins – Miller Canfield
collinsp@millercanfield.com
(517)483-4908

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Environmental Compliance During the Covid 19 Crisis: Resources to Consider

- www.michigan.gov/coronavirus
- www.cdc.gov
- www.michigan.gov/egle/0,9429,7-135-99239--_,00.html
- <https://www.epa.gov/coronavirus>
- www.millercanfield.com/resources-COVID-19-Resource-Center.html
- www.millercanfield.com/resources-business-reopening-toolkit.html
- www.millercanfield.com/resources-millercanfield-coronavirus-response-team.html

Overview: Discretion

- Overview of EPA Policy
 - www.epa.gov/enforcement/covid-19-implications-epas-enforcement-and-compliance-assurance-program
- Focuses on Routine Monitoring and Recordkeeping Requirements
- No “Make Up” Duty
- Self-Reporting Obligations Continue
- Current Legal Status

Discretion: Some Things to Consider

- Similar to Force Majeure *but* Does Not Excuse Compliance
- Applies Only to the Agency Exercising It
- Self Reporting
- Other Enforcement Risks
- Protection of Public Health and the Environment Is Paramount