



Janice K. Brewer
Governor

ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY

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Henry R. Darwin
Director

September 12, 2013

Debra K. Davenport
Auditor General
2910 N. 44th Street, Ste. 410
Phoenix, AZ 85018

Dear Ms. Davenport:

This letter provides the Arizona Department of Environmental Quality's response to the September 5, 2013 revised preliminary report draft of the department's Sunset Factors report. We appreciate the diligence and hard work of the Auditor General's staff in completing this report and their consideration of our feedback on the previous draft.

The auditors identified three areas for improvement the Department should address related to its processes for approving and renewing coverage under general permits. Specifically:

1.1 The Department should track required renewals of Aquifer Protection Permit (APP) general permit coverage, identify entities with expired coverage that are still operating, and develop a process for addressing facilities that do not renew as required

Response: The finding of the Auditor General is agreed to and the audit recommendation will be implemented.

1.2 The Department should develop policies and procedures for reviewing and approving air quality general permit coverage applications and continue with efforts to test the feasibility of e-permitting for air quality general permits; if these e-permitting tests prove successful, use e-permitting for all of its air quality general permits and develop policies, procedures, or other guidance documents for manager review of e-permitting decisions and periodic audits of the e-permitting system.

Response: The finding of the Auditor General is agreed to and the audit recommendation will be implemented.

1.3 The Department should adopt a risk-based approach for inspecting on-site wastewater facilities prior to issuing permit coverage.

Response: The finding of the Auditor General is agreed to and the audit recommendation will be implemented.

2.1 The Department should complete the rule-making process for rules required by A.R.S. §§ 49-761, 49-762, and 49-762.02 once the Governor's rule-making moratorium expires.

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Response: The finding of the Auditor General is agreed to and the audit recommendation will be implemented.

3.1 In order to comply with A.R.S. § 41-1091.01, the Department should post on its Web site the full text of each substantive policy statement currently in use and the related notice.

Response: The finding of the Auditor General is agreed to and the audit recommendation will be implemented.

On behalf of ADEQ, we appreciate having had this opportunity to respond to the above recommendation. Moreover, we appreciate the professionalism and cooperation your audit team demonstrated in working with us throughout the performance audit process. We found the process and the results to be both constructive and informative, and we look forward to timely implementation of all the recommendations identified in your audit reports.

Sincerely,

Henry R. Darwin
Director