

Office of the Auditor General

Performance Audit Report

Asbestos Program

Air Quality Division
Department of Environmental Quality

August 2017

State of Michigan Auditor General
Doug A. Ringler, CPA, CIA

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Article IV, Section 53 of the Michigan Constitution



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Report Summary

Performance Audit

Asbestos Program

Air Quality Division (AQD)

Department of Environmental Quality (DEQ)

Report Number:

761-0142-16

Released:

August 2017

The AQD Technical Programs Unit administers the National Emission Standards for Hazardous Air Pollutants (NESHAP) to protect the public and the environment by minimizing the release of asbestos fibers during demolition and renovation activities. AQD's program oversight includes reviewing notifications of intent to demolish or renovate; inspecting demolitions and asbestos removals for compliance with NESHAP regulations; and initiating enforcement actions when violations occur. As of May 31, 2017, AQD had 4 full-time and 1 part-time employees dedicated to performing inspections of demolition and asbestos removal projects. For fiscal year 2016, DEQ expended approximately \$635,000 on Asbestos Program activities. For fiscal year 2017 (through May 31), DEQ expended approximately \$418,000.

Audit Objective			Conclusion
Objective #1: To assess the effectiveness of DEQ's monitoring for compliance with NESHAP regulations for demolition and renovation projects.			Moderately effective
Findings Related to This Audit Objective	Material Condition	Reportable Condition	Agency Preliminary Response
AQD did not ensure the timely and complete input of all required inspection, complaint, and violation information into the Michigan Air Compliance and Enforcement System (MACES). Missing or incomplete information included inspection reports and dates documenting complaint or violation resolution, violation notice response deadlines, and violation responses received (Finding #1).		X	Agrees
AQD should improve its process to help ensure that liable parties provide timely responses to violation notices. Liable parties did not submit 20% of responses, and 14% of responses received were between 8 and 36 days late (Finding #2).		X	Agrees

Audit Objective			Conclusion
Objective #2: To assess the effectiveness of DEQ's efforts to ensure the proper disposal of asbestos-containing materials at landfills.			Moderately effective
Findings Related to This Audit Objective	Material Condition	Reportable Condition	Agency Preliminary Response
AQD could not demonstrate that it inspected 87% of Type II landfills to ensure the proper disposal of asbestos-containing materials (<u>Finding #3</u>).		X	Agrees

Audit Objective			Conclusion
Objective #3: To assess the efficiency of DEQ's process to inspect demolition and renovation projects.			Efficient
Findings Related to This Audit Objective	Material Condition	Reportable Condition	Agency Preliminary Response
None reported.	Not applicable.		
Observations Related to This Audit Objective	Material Condition	Reportable Condition	Agency Preliminary Response
DEQ should work with the Legislature to establish a fee structure to assist in funding the Asbestos Program. Without assessing fees, AQD is limited in the number of asbestos inspections that it can conduct and its ability to protect the public and the environment from exposure to asbestos emissions (<u>Observation #1</u>).	Not applicable for observations.		

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Doug A. Ringler, CPA, CIA
Auditor General

August 9, 2017

Ms. C. Heidi Grether, Director
Department of Environmental Quality
Constitution Hall
Lansing, Michigan

Dear Ms. Grether:

I am pleased to provide this performance audit report on the Asbestos Program, Air Quality Division, Department of Environmental Quality.

We organize our audit findings and observations by audit objective. Your agency provided preliminary responses to the recommendations at the end of our fieldwork. The *Michigan Compiled Laws* and administrative procedures require an audited agency to develop a plan to comply with the recommendations and submit it within 60 days of the date above to the Office of Internal Audit Services, State Budget Office. Within 30 days of receipt, the Office of Internal Audit Services is required to review the plan and either accept the plan as final or contact the agency to take additional steps to finalize the plan.

We appreciate the courtesy and cooperation extended to us during this audit.

Sincerely,

Doug Ringler
Auditor General

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AUDIT OBJECTIVES, CONCLUSIONS, FINDINGS, AND OBSERVATIONS

MONITORING FOR COMPLIANCE WITH NESHAP REGULATIONS

BACKGROUND

The National Emission Standards for Hazardous Air Pollutants (NESHAP) require building owners or operators* to submit notifications to the Air Quality Division (AQD) for all demolitions* and for renovations* where the amount of regulated asbestos-containing material* (RACM) meets or exceeds the thresholds specified in NESHAP regulations. AQD conducts compliance inspections to determine if the contractor performing the demolition or renovation is in compliance with NESHAP regulations regarding the proper removal and disposal of asbestos-containing materials*. At the completion of an inspection, AQD policy requires that a report be entered into the Michigan Air Compliance and Enforcement System (MACES) database detailing the inspection activities and summarizing conclusions and findings. AQD uses MACES to track the type of activity being conducted at the demolition, renovation, or abatement* site; the date and nature of inspection (scheduled or in response to a complaint); contractor information; facility information; and disposal information. Building owners and operators are liable for compliance with NESHAP regulations. During fiscal year 2016, AQD received 17,188 notifications and completed 1,404 inspections.

AUDIT OBJECTIVE

To assess the effectiveness* of the Department of Environmental Quality's (DEQ's) monitoring for compliance with NESHAP regulations for demolition and renovation projects.

CONCLUSION

Moderately effective.

FACTORS IMPACTING CONCLUSION

- Notifications of intent to demolish/renovate for ordered demolitions were submitted on a timely basis, signed by building owners and operators, contained the required information, and included the required attachments.
- AQD acted upon 98% of complaints within 7 days of receipt.
- Reportable conditions* related to more timely and complete input of information into MACES and more timely responses to violation notices by liable parties (Findings #1 and #2).

* See glossary at end of report for definition.

FINDING #1

Improvements needed for timely and complete input of information into MACES.

AQD did not ensure the timely and complete input of inspection, complaint, and violation information into MACES to allow for proper management oversight.

AQD conducts inspections of demolition and renovation projects to determine if abatement or demolition activities are performed in compliance with NESHAP regulations. An inspection may occur after a notification, complaint, referral, or follow-up from a previous inspection. Inspectors are required to issue a violation notice to liable parties for any NESHAP violation that may result in the release of hazardous emissions. Inspection reports and violation notices are required to be documented in MACES.

Our review of MACES data disclosed that AQD inspectors did not:

- a. Document inspection reports in MACES for:

- (1) 7 (10%) of 70 randomly selected inspections.
- (2) 10 (8%) of 124 ordered demolition inspections.
- (3) 3 additional inspections identified through other audit procedures.

AQD Standard Operating Procedures require an inspector to complete a report at the conclusion of an inspection. The completed report, notification, photographs, sample analysis information, and related paperwork should be filed in the asbestos inspection files, and the information should also be entered into MACES.

- b. Sufficiently complete inspection reports for 7 (6%) of 124 ordered demolition inspections. For example, 3 reports stated only "I arrived."

AQD Standard Operating Procedures require that inspection reports include post-inspection interviews, chronologies of events, and summaries of conclusions and findings and that this information also be input into MACES. Without complete inspection reports, it is difficult for AQD to ensure that projects complied with NESHAP regulations.

- c. Update key date fields in MACES for complaints and violations. We noted:

- (1) Complaint resolution date was not input for 65 (22%) of 297 complaints received.
- (2) Violation notice response deadline date was not input for 3 (9%) of 35 violation notices reviewed.
- (3) Violation notice response received date was not input for 11 (31%) of 35 violation notices reviewed.

(4) Violation resolution date was not input for 9 (26%) of 35 violation notices reviewed.

AQD Standard Operating Procedures require that the results of a complaint inspection, including a record of the violation notice, be entered into MACES. Without documenting these key dates, AQD cannot ensure that reports generated by MACES provide reliable information regarding the status of complaints and violations.

AQD informed us that the highest priorities of the Asbestos Program are conducting field inspections and responding to complaints. The high volume of notifications, inspector time spent in the field, and limited resources have contributed to the omitted and unfinished reports and the key date fields that were not input into MACES. Upon identification of the missing or incomplete reports, AQD staff completed or clarified the reports in MACES.

RECOMMENDATION

We recommend that AQD ensure the timely and complete input of inspection, complaint, and violation information into MACES.

AGENCY PRELIMINARY RESPONSE

DEQ provided us with the following response:

AQD agrees that all inspection, complaint, and violation information must be properly entered into the MACES database. To assure proper entry, consistent information, and periodic reviews, AQD will develop and implement a policy and procedure for the Asbestos Program and MACES Documentation by January 1, 2018.

FINDING #2

More timely responses to violation notices by liable parties needed.

AQD should improve its process to help ensure that liable parties provide timely responses to violation notices. Timely responses would increase AQD's ability to ensure compliance with NESHAP regulations and reduce the risk of recurring violations.

AQD Standard Operating Procedures require AQD inspectors to issue a violation notice to all liable parties (owners and operators) for workplace violations that may cause the release of emissions. AQD requires each liable party to provide a written response to the violations within 21 calendar days from the notice date. AQD issues violation notices for incidents such as inadequate wetting or packaging of asbestos-containing materials.

We reviewed 35 violation notices issued to 74 liable parties and noted that AQD did not:

- a. Ensure that it received a response from 15 (20%) of the 74 liable parties.

Also, AQD did not follow up with 13 (87%) of the 15 parties after the due date to obtain the required response.

- b. Document the date that it received a response for 14 (24%) of the 59 responses received.

Lack of a received date limits AQD's ability to ensure that a response was received in a timely manner and to determine if follow-up with the liable party is necessary.

- c. Ensure that owners provided a timely response to AQD.

Eight (14%) of the 59 responses were received between 8 and 36 days past the due date. AQD did not follow up with the liable parties regarding the late responses prior to their receipt.

AQD informed us that the high volume of notifications impacted the ability of its inspectors to follow up on late responses. Instead, staff prioritized their work and focused on preventing asbestos violations by conducting field inspections and responding to complaints.

RECOMMENDATION

We recommend that AQD improve its process to help ensure that liable parties provide timely responses to violation notices.

AGENCY PRELIMINARY RESPONSE

DEQ provided us with the following response:

AQD agrees that additional actions are needed to assure timely responses to violation notices. To assure timely responses are documented and proper follow-up occurs on late responses, AQD will develop and implement a policy and procedure for the Asbestos Program and MACES Documentation by January 1, 2018.

PROPER DISPOSAL OF ASBESTOS-CONTAINING MATERIALS AT LANDFILLS

BACKGROUND

NESHAP requires that no visible emissions be discharged to the outside air from the collection, processing, transport, and disposal of asbestos-containing waste materials*. It also requires that the asbestos-containing waste material deposited at a landfill be covered within 24 hours and that the landfill owner or operator maintain waste shipment records and a site map of where the asbestos-containing materials are disposed of within the landfill. AQD conducts inspections of the landfills to determine if the owner or operator is in compliance with these NESHAP requirements.

AUDIT OBJECTIVE

To assess the effectiveness of DEQ's efforts to ensure the proper disposal of asbestos-containing materials at landfills.

CONCLUSION

Moderately effective.

FACTORS IMPACTING CONCLUSION

- Landfill inspection reports that AQD documented in MACES contained sufficient details to support that inspections were conducted to determine compliance with NESHAP regulations.
- Reportable condition related to insufficient documentation of landfill inspections (Finding #3).

* See glossary at end of report for definition.

FINDING #3

Insufficient documentation of landfill inspections.

AQD could not demonstrate that it inspected Type II landfills* to ensure the proper disposal of asbestos-containing materials.

A Type II landfill may receive household, municipal solid, construction, and demolition waste. Part 115 of Public Act 451 of 1994, as amended, requires that all State or federally regulated asbestos-containing material must be disposed of at a Type II landfill. A landfill inspection includes determining whether transport containers are properly labeled, material disposed of is covered within the required 24 hours, and delivery manifest documentation is maintained by the landfill facility. Our review disclosed:

- a. AQD could not provide evidence that it inspected 41 (87%) of 47 Type II landfills. AQD inspectors could not demonstrate that they conducted any inspections at the 41 landfills. During fiscal year 2016, these landfills received asbestos-containing materials for 10,655 notifications of intent to demolish/renovate. AQD should improve its guidance for selecting landfills to inspect.
- b. AQD Standard Operating Procedures state that the Asbestos Program shall conduct compliance inspections when necessary of landfills to ensure the proper disposal of asbestos-containing materials; however, the procedures did not indicate how the landfills will be selected and the number of landfill inspections to be conducted. AQD should develop a risk-based approach to selecting landfills for inspection using criteria such as the size of the landfill, amount of asbestos waste received, and previous noted violations.

AQD informed us that current inspector staffing levels and site inspections priorities and complaint responses contributed to the lack of completion of landfill inspections or documentation of completed landfill inspections.

RECOMMENDATION

We recommend that AQD document the inspection of Type II landfills to ensure the proper disposal of asbestos-containing materials.

AGENCY PRELIMINARY RESPONSE

DEQ provided us with the following response:

AQD agrees that additional actions are needed to assure landfill inspections are completed and well documented. AQD will develop and implement a policy and procedure for the Asbestos Program and MACES Documentation by January 1, 2018.

* See glossary at end of report for definition.

PROCESS TO INSPECT PROJECTS

BACKGROUND

AQD selects demolition and renovation projects to inspect based on complaints received, geographic locations of notifications received, and prior knowledge of contractors with previous violations.

AUDIT OBJECTIVE

To assess the efficiency* of DEQ's process to inspect demolition and renovation projects.

CONCLUSION

Efficient.

FACTORS IMPACTING CONCLUSION

- AQD selects demolition and renovation projects in accordance with its Standard Operating Procedures.
- Observation* related to existing limitations regarding inspections (Observation #1).

* See glossary at end of report for definition.

OBSERVATION #1

Limitations exist regarding the inspection of demolition and renovation projects and Type II landfills.

DEQ should work with the Legislature to establish a fee structure to assist in funding the Asbestos Program. Increased funding could be used to hire additional staff to assist DEQ in meeting its scorecard goal of inspecting 15% of notifications received.

DEQ did not charge a fee to operators or property owners who submit an asbestos notification or for DEQ to conduct an inspection of the property. In contrast, the Michigan Occupational Safety and Health Administration (MIOSHA) and other states charge notification fees or asbestos removal fees. MIOSHA conducts inspections to ensure worker safety during demolition and renovation projects and assesses a notification fee of 1% of the contract price for the asbestos abatement portion of the project. Ohio and Illinois charge \$75 and \$150, respectively, for each notification received in those states. Other states also charge fees based on the amount of asbestos to be removed as follows:

State	Removal Fee
Illinois	None
Indiana	\$50 for up to 1,600 square feet/2,600 linear feet of asbestos removed \$150 for more than 1,600 square feet/2,600 linear feet of asbestos removed
Michigan	None
Ohio	\$3 per 50 linear/square feet of asbestos abated
Wisconsin	\$135 for demolitions with less than 160 square feet/260 linear feet \$400 for demolitions or renovations with greater than 160 square feet/260 linear feet but less than 1,000 feet combined \$700 for demolitions or renovations with at least 1,000 but less than 5,000 total feet \$1,350 for demolitions or renovations with at least 5,000 total feet

The Asbestos Program has 4.3 inspectors responsible for inspecting demolition and renovation projects and Type II landfills throughout the State. Two inspectors are responsible for the metropolitan Detroit area, 2 are responsible for the remainder of the lower peninsula, and 1 inspector at a 25% utilization rate is responsible for the Upper Peninsula (see Exhibit #1).

Without assessing fees, AQD is limited in the number of asbestos inspections that it can conduct, its ability to conduct inspections in all areas of the State (see Exhibit #2), and its ability to conduct landfill inspections as noted in Finding #3 (see Exhibit #3). As a result, DEQ has been unable to meet its scorecard goal of inspecting 15% of notifications received.

Michigan receives the most notifications among the states in its United States Environmental Protection Agency (EPA) region primarily because of the Detroit blight removal project. The following chart compares the number of inspectors, notifications received, and inspections completed for the states in Michigan's EPA region as reported in the 2016 EPA Region 5 State Agencies

Air Compliance and Enforcement Activity Report and information provided by each state:

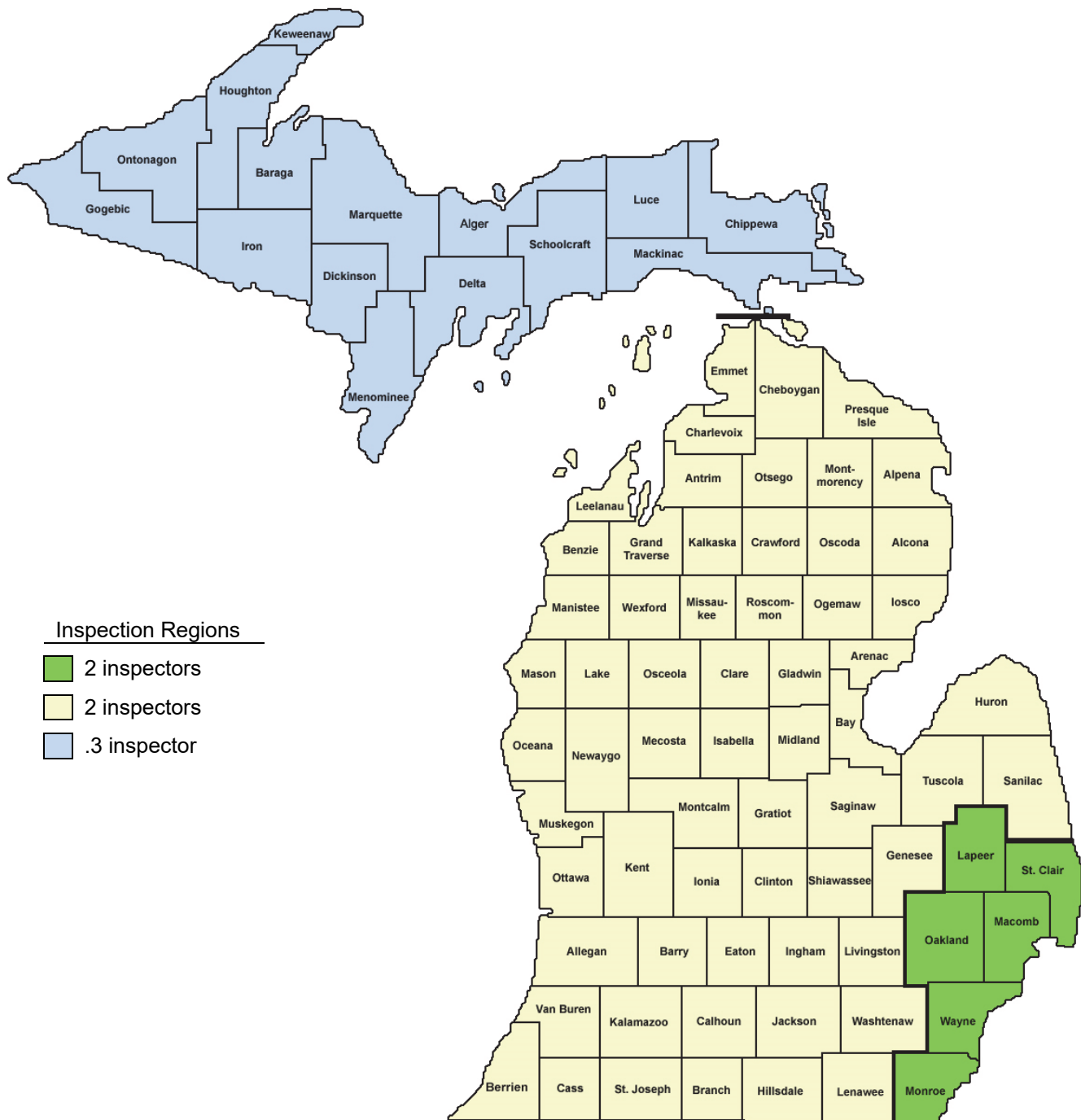
State	Number of Inspectors	Number of Notifications	Number of Inspections	Percent of Inspections to Notifications
Illinois	1	3,789	53	1%
Indiana	4.5	2,725	356	13%
Michigan	4.3	17,188	1,404	8%
Ohio	31	6,193	2,056	33%
Wisconsin	4	933	218	23%

In June 2016, AQD submitted a request to the DEQ Administration Division that cited the need for additional inspection staff and funding to cover the associated cost. For fiscal year 2016, DEQ expended approximately \$635,000 in General Fund money to conduct inspections, respond to and resolve complaints, and issue violation notices.

SUPPLEMENTAL INFORMATION

UNAUDITED
Exhibit #1

ASBESTOS PROGRAM
Air Quality Division
Department of Environmental Quality
Map of Inspection Regions
As of September 30, 2016



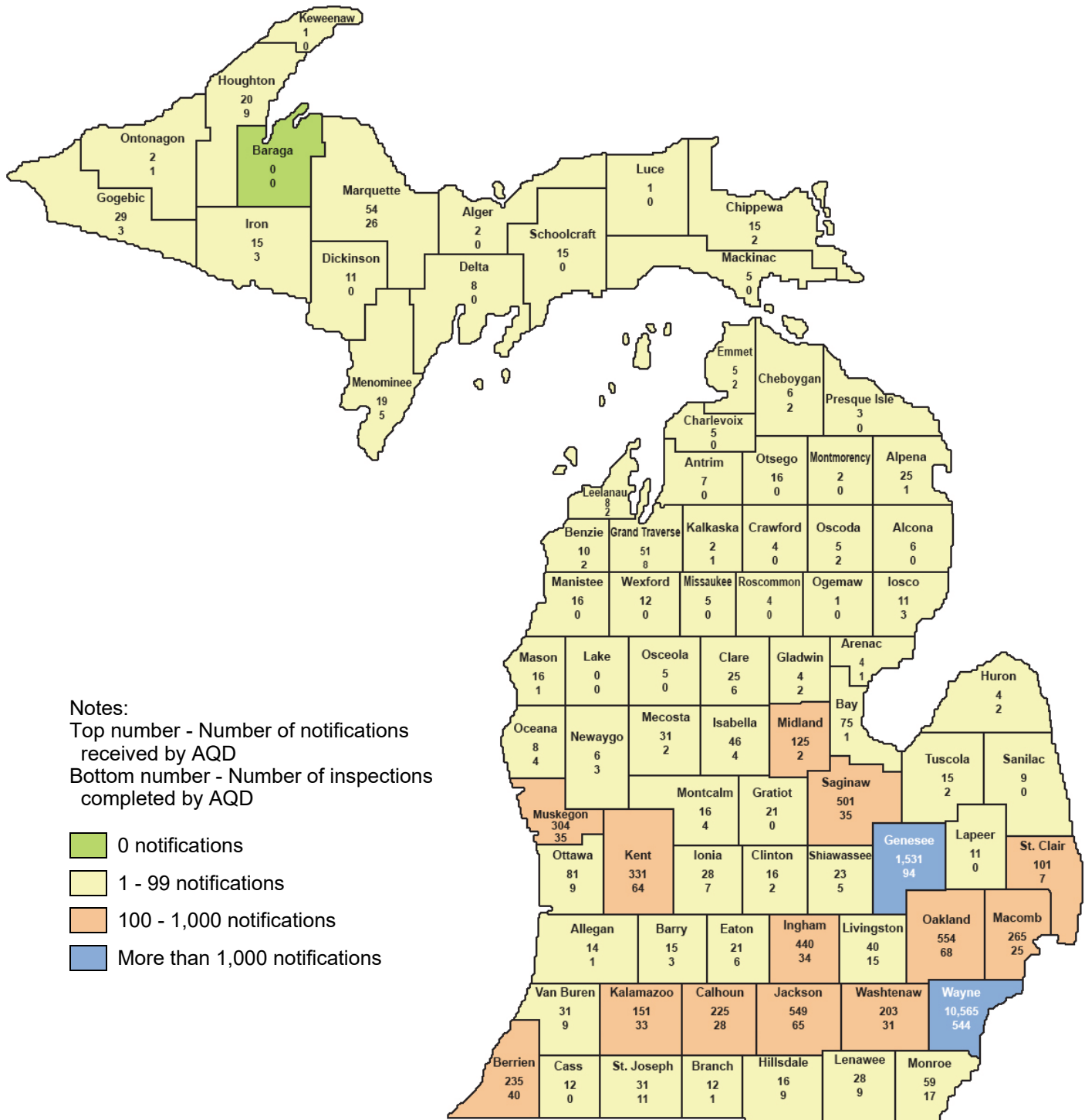
Source: Air Quality Division Asbestos Program Manager.

ASBESTOS PROGRAM

Air Quality Division

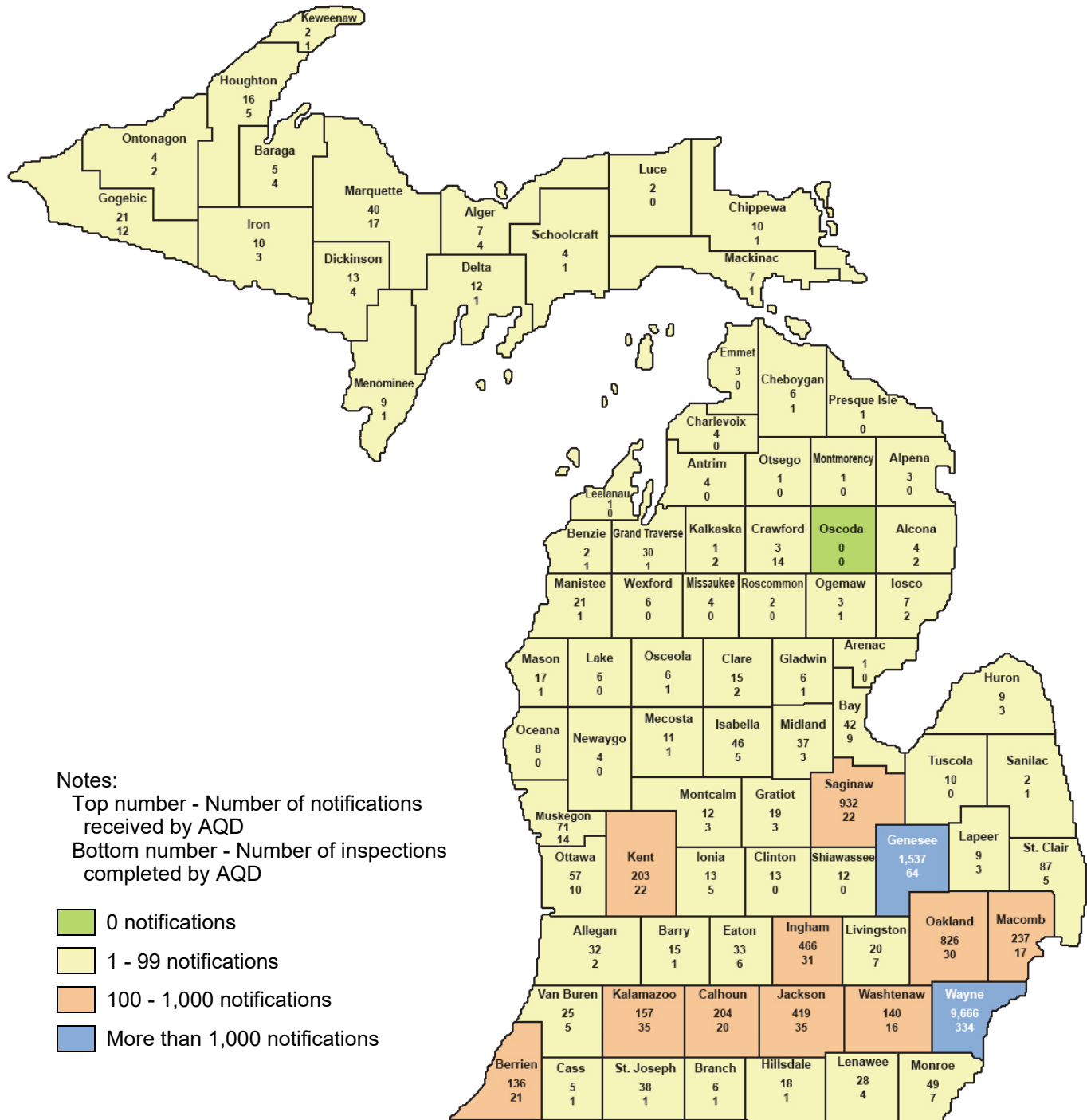
Department of Environmental Quality

Map of Notifications of Intent to Demolish/Renovate Received and Inspections Completed by County
For Fiscal Year 2016



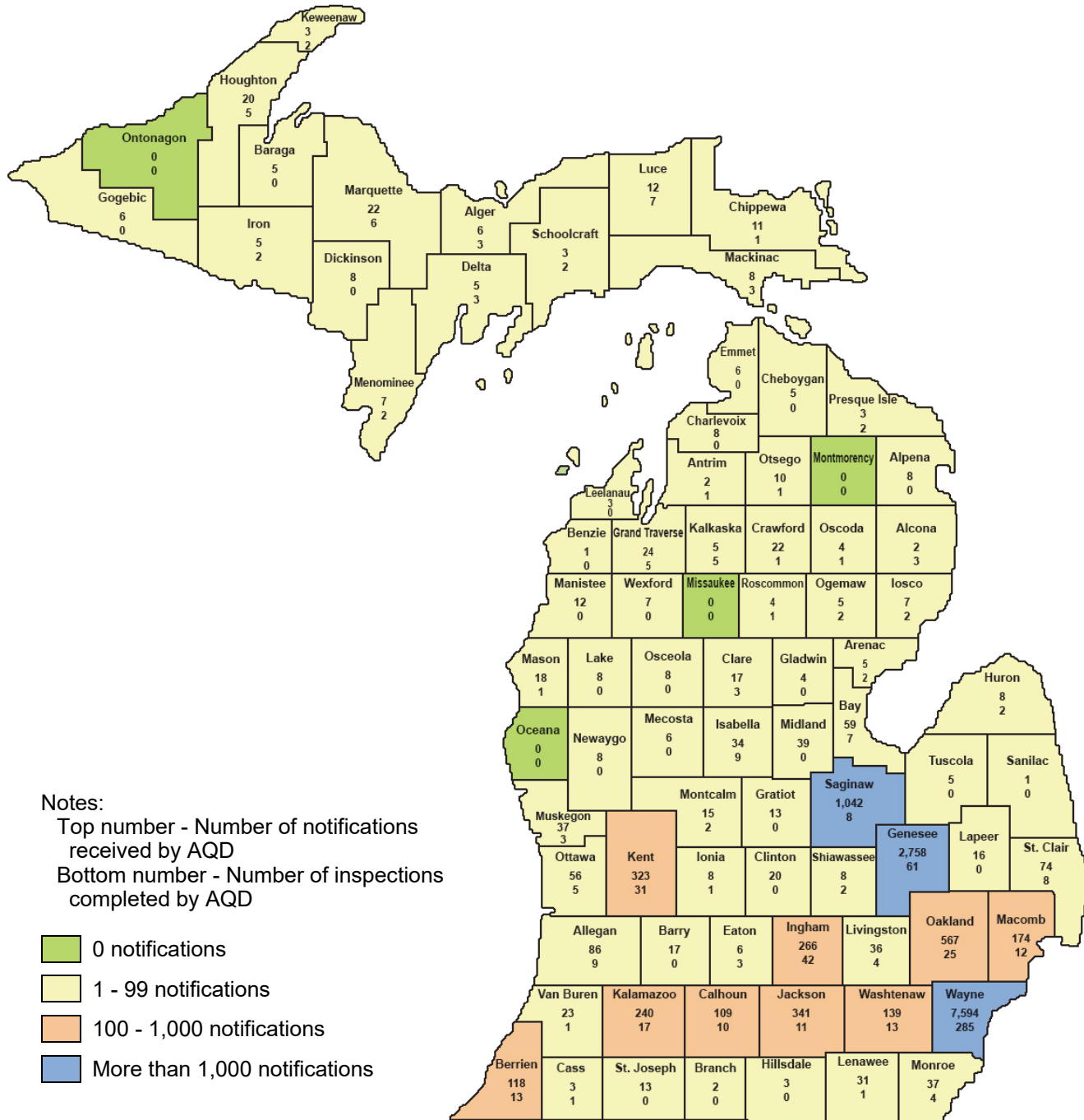
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ASBESTOS PROGRAM
Air Quality Division
Department of Environmental Quality
Map of Notifications of Intent to Demolish/Renovate Received and Inspections Completed by County
For Fiscal Year 2015



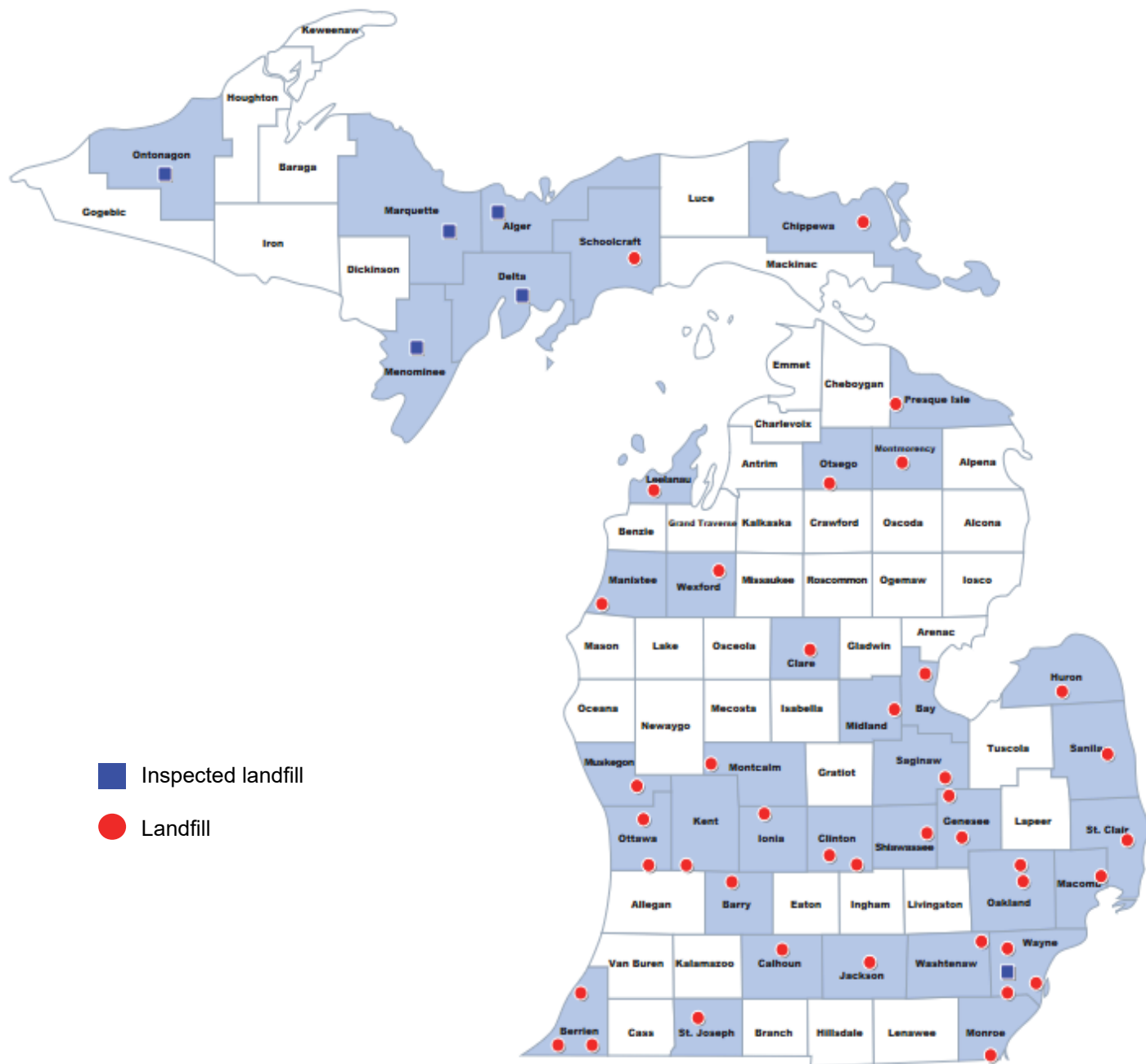
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ASBESTOS PROGRAM
Air Quality Division
Department of Environmental Quality
Map of Notifications of Intent to Demolish/Renovate Received and Inspections Completed by County
For Fiscal Year 2014



Source: The OAG created this exhibit using data obtained from DEQ's MACES.

ASBESTOS PROGRAM
Air Quality Division
Department of Environmental Quality
Map of Detailed Locations and Inspections Completed for Type II Landfills
As of September 30, 2016



Source: Air Quality Division Asbestos Program Notification Coordinator.

Interactive map: [Detailed Locations and Inspections Completed for Type II Landfills](#)

AGENCY DESCRIPTION

The Clean Air Act requires the EPA to develop and enforce regulations to protect the general public from exposure to hazardous airborne contaminants. Under Section 112 of the Act, the EPA established NESHAP. The purpose of NESHAP is to protect the public and the environment by minimizing the release of asbestos fibers during demolition and renovation activities. The AQD Technical Programs Unit administers NESHAP for the State.

AQD is responsible for reviewing notifications of intent to demolish or renovate for completeness and timeliness, inspecting demolitions and asbestos removals, and initiating enforcement actions when violations occur. AQD maintains an educational and safety training program for all asbestos inspectors. All AQD Asbestos Program inspectors attend initial and annual Hazardous Waste Operations and Emergency Response Standard (HAZWOPER) and asbestos specific training. In addition, all AQD inspectors are provided annual health screenings and personal protection equipment.

As of May 31, 2017, AQD had 4 full-time and 1 part-time employees dedicated to performing inspections of demolition and asbestos removal projects. For fiscal year 2016, DEQ expended approximately \$635,000 on Asbestos Program activities. For fiscal year 2017 (through May 31), DEQ expended approximately \$418,000.

AUDIT SCOPE, METHODOLOGY, AND OTHER INFORMATION

AUDIT SCOPE

To examine the program and other records related to the Asbestos Program. We conducted this performance audit* in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

PERIOD

Our audit procedures, which included a preliminary survey, audit fieldwork, report preparation, analysis of agency responses, and quality assurance, generally covered October 1, 2013 through September 30, 2016.

METHODOLOGY

We conducted a preliminary survey to formulate a basis for establishing our audit objectives and defining our audit scope and methodology. We:

- Interviewed DEQ personnel to obtain an understanding of the Asbestos Program's operations, responsibilities, and activities.
- Reviewed AQD Standard Operating Procedures and relevant federal laws.
- Analyzed available records, data, and statistics.

OBJECTIVE #1

To assess the effectiveness of DEQ's monitoring for compliance with NESHAP regulations for demolition and renovation projects.

To accomplish this objective, we:

- Randomly sampled and reviewed 70 asbestos inspections and reviewed 124 ordered demolition inspections to determine whether inspection reports were completed on a timely basis and documented in MACES.
- Randomly sampled 20 notifications for ordered demolitions to determine if the notifications contained valid information and included the required attachments.
- Reviewed complaint data in MACES to determine whether the complaint resolution date was documented.

* See glossary at end of report for definition.

- Randomly sampled 35 violation notices to determine whether the violation notice date, response deadline date, and response received date and violation resolution date were documented in MACES. We also reviewed the case files for the 35 violation notices to determine whether liable parties provided a timely response and whether AQD followed up on late responses.

Our random samples were selected to eliminate any bias and to enable us to project the results to the respective populations.

OBJECTIVE #2

To assess the effectiveness of DEQ's efforts to ensure the proper disposal of asbestos-containing materials at landfills.

To accomplish this objective, we:

- Reviewed MACES data to determine the number of Type II landfills inspected by DEQ.
- Reviewed the 7 landfill inspections to determine if the inspection reports were sufficient and documented in MACES.

OBJECTIVE #3

To assess the efficiency of DEQ's process to inspect demolition and renovation projects.

To accomplish this objective, we:

- Reviewed AQD procedures to understand and evaluate the criteria established for the selection of inspections of demolition and renovation projects.
- Interviewed AQD inspection staff to understand and evaluate the process used to select inspections of demolition and renovation projects and compared it to the criteria in AQD's procedures.
- Reviewed MACES data to determine the number of notifications received and inspections completed in each county in Michigan.

CONCLUSIONS

We base our conclusions on our audit efforts and any resulting material conditions* or reportable conditions.

When selecting activities or programs for audit, we direct our efforts based on risk and opportunities to improve State government operations. Consequently, we prepare our performance audit reports on an exception basis.

* See glossary at end of report for definition.

**AGENCY
RESPONSES**

Our audit report contains 3 findings and 3 corresponding recommendations. DEQ's preliminary response indicates that AQD agrees with all of the recommendations.

The agency preliminary response that follows each recommendation in our report was taken from the agency's written comments and oral discussion at the end of our audit fieldwork. Section 18.1462 of the *Michigan Compiled Laws* and the State of Michigan Financial Management Guide (Part VII, Chapter 4, Section 100) require an audited agency to develop a plan to comply with the recommendations and submit it within 60 days after release of the audit report to the Office of Internal Audit Services, State Budget Office. Within 30 days of receipt, the Office of Internal Audit Services is required to review the plan and either accept the plan as final or contact the agency to take additional steps to finalize the plan.

**SUPPLEMENTAL
INFORMATION**

Our audit report includes supplemental information presented as Exhibits #1 through #3. Our audit was not directed toward expressing a conclusion on this information.

GLOSSARY OF ABBREVIATIONS AND TERMS

abatement	The act of removing asbestos-containing material.
AQD	Air Quality Division.
asbestos-containing materials	Any materials containing more than 1% asbestos.
asbestos-containing waste materials	Mill tailings or any waste that contains commercial asbestos and is generated by a source subject to the Asbestos NESHAP. This includes filters from control devices, friable asbestos waste material, and bags or other similar packaging contaminated with commercial asbestos. As applied to demolition and renovation operations, this term also includes regulated asbestos-containing material waste and materials contaminated with asbestos, including disposable equipment and clothing.
demolition	The wrecking or taking out of any load-supporting structural member of a facility together with any related handling operations or the intentional burning of a facility.
DEQ	Department of Environmental Quality.
effectiveness	Success in achieving mission and goals.
efficiency	Achieving the most outputs and the most outcomes practical with the minimum amount of resources.
EPA	United States Environmental Protection Agency.
MACES	Michigan Air Compliance and Enforcement System.
material condition	A matter that, in the auditor's judgment, is more severe than a reportable condition and could impair the ability of management to operate a program in an effective and efficient manner and/or could adversely affect the judgment of an interested person concerning the effectiveness and efficiency of the program.
MIOSHA	Michigan Occupational Safety and Health Administration.
NESHAP	National Emission Standards for Hazardous Air Pollutants.

OAG	Office of the Auditor General.
observation	A commentary that highlights certain details or events that may be of interest to users of the report. An observation differs from an audit finding in that it may not include the attributes (condition, effect, criteria, cause, and recommendation) that are presented in an audit finding.
owner or operator	Any person who owns, leases, operates, controls, or supervises the facility being demolished or renovated or any person who owns, leases, operates, controls, or supervises the demolition or renovation operation, or both.
performance audit	An audit that provides findings or conclusions based on an evaluation of sufficient, appropriate evidence against criteria. Performance audits provide objective analysis to assist management and those charged with governance and oversight in using the information to improve program performance and operations, reduce costs, facilitate decision-making by parties with responsibility to oversee or initiate corrective action, and contribute to public accountability.
regulated asbestos-containing material (RACM)	Friable asbestos material; category I nonfriable asbestos-containing material that has become friable; category I nonfriable asbestos-containing material that will be or has been subjected to sanding, grinding, cutting, or abrading; or category II nonfriable asbestos-containing material that has a high probability of becoming or has become crumbled, pulverized, or reduced to powder by the forces expected to act on the material in the course of demolition or renovation operations.
renovation	Altering a facility or facility components in any way, including the stripping or removal of RACM.
reportable condition	A matter that, in the auditor's judgment, is less severe than a material condition and falls within any of the following categories: an opportunity for improvement within the context of the audit objectives; a deficiency in internal control that is significant within the context of the audit objectives; all instances of fraud; illegal acts unless they are inconsequential within the context of the audit objectives; significant violations of provisions of contracts or grant agreements; and significant abuse that has occurred or is likely to have occurred.
Type II landfill	A landfill which receives household waste or municipal solid waste incinerator ash and which is not a land application unit, surface impoundment, injection well, or waste pile. The landfill may also receive other types of solid waste, such as construction and demolition waste.



Report Fraud/Waste/Abuse

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