



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

April 30, 2004

Al Brown, Director
Maricopa County Environmental Services Department
1001 N. Central Avenue
Phoenix, AZ 85004

Re: Proposed Title V Operating Permit for Luke Air Force Base

Dear Mr. Brown:

Thank you for the opportunity to review the proposed Title V permit for Luke Air Force Base (LAFB). This permit was originally proposed by Maricopa County Environmental Services Department (MCESD) on December 10, 2003. MCESD subsequently withdrew the permit from review on January 20, 2004 in order to address issues that EPA had identified. The permit was re-proposed to EPA on March 17, 2004. Upon review of the re-proposed permit, EPA finds that it fails to comply with and incorporate all applicable requirements. Therefore, EPA formally objects to the permit.

Our objection to this permit is based on Section 505 of the Clean Air Act, Part 70.8 of Volume 40 of Code of Federal Regulations (40 CFR 70.8), and County Rule 210 Section 303.4. MCESD has 90 days to address EPA's objection issues. If the 90-day period expires without the objections being fully satisfied, Section 505(c) of the Clean Air Act and 40 CFR §70.8(c)(4) require EPA to issue or deny the permit. However, we believe that we can work with you and your staff to resolve these issues within the 90-day time frame. The enclosed document identifies the issues that must be addressed in order to satisfy our objection; it also contains suggestions for additional revisions that could improve the permit.

We are committed to working with MCESD and LAFB to resolve the issues we have identified as expeditiously as possible. Please contact Gerardo Rios, Chief of the Permits Office, at (415) 972-3974 if you have any questions concerning our comments.

Sincerely,

original signed by Matt Haber for

Deborah Jordan
Director, Air Division

Enclosure

cc: Philip M. Breedlove, United States Air Force