Message

From: Brahmbhatt, Roshni [brahmbhatt.Roshni@epa.gov]
Sent: 2/24/2021 12:56:33 AM
To: Yannayon, Laura [Yannayon.Laura@epa.gov]
CC: Trombadore, Claire [Trombadore.Claire@epa.gov]; Kurpius, Meredith [Kurpius.Meredith@epa.gov]
Subject: Fwd: Maricopa County Air Quality Oversite Concern
Attachments: AQ Memo UAE.docx; Small Source Permit Determination.docx

Hi Laura,

The concern below is focused on Maricopa County's permitting program. Would you be able to assist?

Thank you,
Roshni

Roshni Brahmbhatt
Manager, Air Enforcement Section
Enforcement and Compliance Assurance Division
US EPA, Region 9
Brahmbhatt.Roshni@EPA.gov
Ph: 415-972-3995

This email, including attachments, may contain material that is confidential, privileged, and/or attorney work product.

Begin forwarded message:

> **From:** "Miller, Amy" <Miller.Amy@epa.gov>
> **Date:** February 22, 2021 at 9:37:47 PM PST
> **To:** "Brahmbhatt, Roshni" <brahmbhatt.Roshni@epa.gov>, "Trombadore, Claire" <Trombadore.Claire@epa.gov>
> **Subject: Fwd: Maricopa County Air Quality Oversite Concern**
>
> Amy C. Miller, Director
> Enforcement and Compliance Assurance Division
> U.S. Environmental Protection Agency, Region 9
> (415) 947-4198
>
> Begin forwarded message:
>
> > **From:** Kirk Flamm < Ex. 6 Personal Privacy (PP) >
> > **Date:** February 7, 2021 at 11:18:52 AM PST
> > **To:** "Miller, Amy" <Miller.Amy@epa.gov>
> > **Subject: Maricopa County Air Quality Oversite Concern**
> >
> > Good morning Amy,

I am emailing to present my concerns with the Maricopa County Air Quality Department's (MCAQD) administration of their permitting program.

I previously worked with the MCAQD in the compliance department and was involved in determination process for which sources need a permit application and complete potential to emit evaluation. This leads me to the attached memorandum that is relied on internally, and not published to the public for comment. This memo appears to be counter to MCAQD adopted rule 200 section 303

To compound this flippant approach to MCAQD own rules please see the "SYNTHETIC MINOR" determination on the Departments website, https://www.maricopa.gov/2433/Non-Title-V-Permit-Information . This interpretation to rule 100 section 200.128, also appears counter.

I have tried to discuss this with the department and asked for a legal evaluation from the Maricopa County Attorney's office, all of which have yielded no results.

I would expect the MCAQD to follow their own rules. With the technical aspect of this, trying to explain how the department is failing to follow their own rules and the potential massive under permitting, reporting, and emission inventory to officials with the authority to make the change I quickly lose interest.

I look forward to hearing from you.

Any more information I can provide, please feel free to contact me.
Thank you,

Kirk