

# PUBLIC SUBMISSION

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Revisions to the Clean Air Act Operating Permit Program; California; South Coast Air Quality Management District

**Comment On:** EPA-R09-OAR-2022-0916-0002

Clean Air Act Operating Permit Program; California; South Coast Air Quality Management District

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Comment submitted by Brooklynn Marcus

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## Submitter Information

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## General Comment

To Whom It May Concern:

I am writing to express my strong support for the proposed revisions to the Clean Air Act (CAA) Operating Permit Program (Title V) for the South Coast Air Quality Management District (SCAQMD), as outlined in the recent direct final rule. The changes to this program are a crucial step toward improving air quality in Southern California, particularly in the Riverside County portion of the Salton Sea Air Basin.

During my bachelor's degree in Environmental Science and Policy at California State University, Long Beach, my classmates and I conducted in-depth research on the Salton Sea and its associated environmental issues. As I have continued my environmental career in California, the Salton Sea Basin area continues to have significant impacts on the surrounding regions. The area's air quality problems have significantly impacted public health, with the rate of children's asthma in the vicinity of the Salton Sea reaching approximately 20%, compared to California's state average of around 8%. The reduction in emissions thresholds for volatile organic compounds (VOC) and oxides of nitrogen (NOx) from 25 tons per year to 10 tons per year is a necessary adjustment given the area's reclassification to "Extreme" nonattainment for the 1997 8-Hour National Ambient Air Quality Standards (NAAQS). This reclassification rightly recognizes the severity of air quality challenges in the region and the need for stricter controls to protect public health and the environment.

Lowering these thresholds will not only help reduce ozone formation, a major component of smog, but also significantly reduce the associated health risks, particularly to vulnerable populations such as the elderly, children, and those with pre-existing respiratory conditions. By revising these thresholds, the SCAQMD ensures that all major sources within the District's jurisdiction are included to meet the applicability requirements at 40 CFR 70.3, Applicability. Implementing stricter emissions standards aligns with the goals of the CAA and demonstrates the EPA's commitment to supporting state and local efforts in managing air quality effectively and improving public health. Furthermore, the revisions will improve the enforceability and compliance of permits issued under the Title V program.

I commend the EPA for its thorough evaluation and decision to approve these revisions through a direct final rule. This approach reflects the changes' noncontroversial nature and alignment with national air quality objectives. I also appreciate the opportunity for public comment and encourage the agency to continue engaging with stakeholders to ensure the successful implementation of these standards. In conclusion, I reiterate my full support for the proposed revisions to the SCAQMD's Title V program and urge the EPA to proceed with their approval. These changes represent a step forward in improving air quality and protecting the health of communities across Southern California and in the Salton Sea Basin area.

Thank you for your consideration.

Sincerely,

Brooklynn Marcus

University of Denver, Environmental Policy and Management Graduate Student