



**LRAPA BOARD OF DIRECTORS
AGENDA ITEM SUMMARY**

Director's Report for February 2020

Meeting Date: March 12, 2020
Department: Director's Office
www.lrapa.org

Agenda Item No. 6
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AIR QUALITY: 02/01/2020 to 02/29/2020

February

Site	Date	Max AQI	Pollutant
Eug/Spfld	22-Feb-20	77	PM
Oak	20-Feb-20	90	PM
CottGrv	20-Feb-20	62	PM

AQI	Eug/Spfld	Oak	CottGrv	Range
Good	18	21	24	0-50
Moderate	11	8	5	51-100
USG	0	0	0	101-150
Unhealthy	0	0	0	151-200
Very Unhealthy	0	0	0	201-300

Attachment No. 1: Air quality index charts for Eugene/Springfield (February 2020)

Attachment No. 2: Air quality index charts for Oakridge (February 2020)

Attachment No. 3: Air quality index charts for Cottage Grove (February 2020)

COMPLAINTS: 02/01/2020 to 02/29/2020 [TOTAL: 62]

- Smoke** – 44 total smoke complaints: 36 for outdoor burning and 8 for home-wood heating.
- Industry** – 5 total complaints: 2 for JH Baxter; 2 for International Paper and 1 for Oregon Industrial Lumber.

3. **Miscellaneous/Unknown/Dust** – 13 total miscellaneous complaints: 2 for asbestos; 1 for Hop Valley Brewery; 2 for Marijuana/Hemp; 1 for diesel automobile exhaust; 1 for general air quality and 6 for unknown odors.

For perspective, here is how the total number of complaints received for calendar year 2020 compares to previous years:

Year	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	*2020
Dust	34	33	44	30	14	25	32	25	26	15	0
Ag/Field Burning	9	13	1	17	4	12	9	1	0	6	0
General Air Quality	2	6	6	26	30	15	20	14	6	12	0
HomeWoodHeating	62	135	95	219	121	342	130	197	126	128	17
Industry	265	169	128	122	127	52	58	74	50	170	26
Outdoor Burning	268	341	268	321	279	251	266	281	351	402	50
Slash Burning	5	16	7	5	7	11	26	13	24	16	0
Miscellaneous	77	101	79	52	57	85	164	138	66	67	9
Unknown	12	25	17	14	35	46	56	63	29	39	16
Total	734	839	645	806	674	839	761	806	678	855	118

* Year-to-date.

ENFORCEMENT: 02/01/2020 to 02/29/2020

Category of Violation	New	Follow-Up Action	Pending	Closed	Total
Asbestos	-	1	-	1	2
Industrial	1	-	12	-	13
Outdoor Burning	4	-	3	1	8
Fugitive Dust	-	-	-	-	-
Home-Wood Heating	-	-	-	-	-
Totals	5	1	15	2	23

Attachment No. 4: Enforcement activities during these reporting periods for case details.

For perspective, here is how the total number of enforcement actions for calendar year 2020 compares to previous years:

Year	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	*2020
Notices of Non-compliance and Warnings	57	64	41	51	36	38	41	39	47	55	6
Notices of Violation with Civil Penalties	39	42	29	23	28	37	37	28	43	37	16

* Year-to-date.

OUTDOOR BURNING LETTER PERMITS: 02/01/2020 to 02/29/2020

There was one Outdoor Burning Special Letter Permits (OBLP) issued in February for forest slash debris.

1. Issued Special Letter Permit 20B20-02-01 on February 28 to LCPW (Chad Hoffman), 3100 East 17th Avenue, Eugene, to burn 10 cubic yards of Forest Slash debris located at Short Mountain Landfill (South Side Natural Area), Eugene.

ASBESTOS ABATEMENT: 02/01/2020 to 02/29/2020

During February, LRAPA received 30 notices of asbestos removal projects, none of which were schools.

For perspective, here is how the total number of asbestos abatement notices filed, how many were schools and the number of notices inspected for calendar year 2020 compares to previous years:

Year	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	*2020
Total Asbestos Abatement Notices	370	357	324	351	352	426	444	543	428	488	76
School Asbestos Abatement Notices (NESHAP)	70	61	53	24	21	24	27	28	24	16	1
Number of Asbestos Abatements Inspected	107	106	90	96	67	89	82	120	77	94	14

* Year-to-date.

PERMITTING (TITLE V AND ACDP): 02/01/2020 to 02/29/2020

LRAPA currently permits 16 Title V sources and approximately 300 Air Contaminant Discharge Permits (ACDP). Below are the total numbers of permit activities that are new, renewals, modifications, construction approvals, registration application's, terminated and/or issued permits the operations staff currently have in process.

Category of Permit	Title V	ACDP	Registration	Total Active
New	-	4	-	4
Renewals	9	19	-	28
Modifications	-	6	-	6
Constructions	-	1	-	1
Registrations	-	-	-	-
Terminated Permits	-	1	-	1
Issued Permits	6	7	-	13
*Total	15	37	-	53

* Year-to-date.

UPDATE ON SOME NATIONAL ISSUES OF LRAPA INTEREST

The National Association of Clean Air Agencies (NACAA, the organization of state and local air directors) publishes an information packed Washington Update every Friday. Here are the weekly highlights from recent weeks.

Week of February 1-7, 2020

See: <http://4cleanair.org/sites/default/files/Documents/020720wklyupdate.pdf>

- D.C. Circuit Declines to Expedite or Pause "SAFE Rule Part One" Litigation
- EPA Releases "2019 Year in Review"
- MECA Issues Report on Technology Feasibility of 2027 Low-NO_x Standard for Heavy-Duty Diesel Trucks
- Administration Seeks Input on New Federal Civil Enforcement Limits
- House Energy and Commerce Subcommittee Conducts Hearing on Carbon Capture and Storage
- EPA Publishes Final Rule Amending Title V Petitions Process
- EPA Publishes Final Reconsideration of Petroleum Refinery NESHAP
- EPA Designates New Federal Reference Method for Sulfur Dioxide Monitoring
- Bipartisan Senate Climate Solutions Caucus Adds Four Members
- EPA Issues RTR for Stationary Combustion Turbines
- EPA Region 9 Administrator Mike Stoker Exits, Deborah Jordan Named Acting Regional Administrator

Week of February 8-14, 2020

See: <http://4cleanair.org/sites/default/files/Documents/021420wklyupdate.pdf>

- President Releases FY 2021 Budget Proposal, Senate Declines Hearings on It

- Majority of CASAC Members Endorse EPA Staff Recommendation to Retain Existing Ozone Standards
- Environmental Groups Sue to Compel EPA to Adopt and Publish Good Neighbor FIPs for 20 States
- Trailer Manufacturers File Opening Brief in Litigation Challenging Regulatory Requirements for Heavy-Duty Truck Trailers
- EPA Announces 2020 Community-Scale Air Toxics Monitoring Grants Competition
- EPA Publishes 2018 Toxics Release Inventory National Analysis
- EPA Releases Enforcement Annual Results FY 2019
- EPA Releases Reports on Impact of Piston-Engine Aircraft Lead Emissions at U.S. Airports
- EPA Releases Draft Guidance on Plantwide Applicability Limitations in NSR Permitting
- EPA Releases Draft Ozone and PM_{2.5} Permit Modeling Guidance
- EPA Proposes Revisions to Regulations for Minimum Emission Reporting Requirements in SIPs
- Utility, Consumer and Environmental Groups Sign Joint Statement of Support for Electric Vehicles
- House Republicans Offer Carbon Capture and Forestry Bills as Climate Framework
- Senate Democrats Introduce Clean Economy Act
- Rhodium Group Analyzes Impacts of Forthcoming Final Rule to Rollback Light-Duty Vehicle Fuel Economy Standards
- IEA Sees Global CO₂ Emissions Flatten in 2019
- Doug Benevento Nominated to Be EPA Deputy Administrator
- John Busterud Named Regional Administrator for EPA Region 9

Week of February 15-21, 2020

See: <http://4cleanair.org/sites/default/files/Documents/022120wklyupdate.pdf>

- NACAA Comments on EPA's ANPRM on Highway Heavy-Duty Engine Standards
- Researchers Find Methane Emissions from Fossil Fuel Extraction Greatly Exceed Previous Estimates
- Researchers Assess Impact of Cross-State Air Pollution on Premature Deaths
- EPA Releases Preliminary 2019 Power Plant Emissions Data
- State and Local Plaintiffs Ask Court to Compel EPA to Adopt Good Neighbor FIPs for Seven Upwind States
- Groups Sue Department of Defense over PFAS Incineration
- States File Amicus Brief in Suit over California's Carbon Trading with Quebec
- Bezos Pledges \$10 Billion for Climate Action

Week of February 22-28, 2020

See: <http://4cleanair.org/sites/default/files/Documents/022820wklyupdate.pdf>

- EPA Administrator Testifies Before House Energy and Commerce Subcommittee on Proposed FY 2021 Budget
- CASAC Transmits Final Responses and Recommendations to EPA on Draft Ozone Policy and Integrated Science Assessments

- EPA Finalizes Rollback of HFC Leak Inspection and Repair Rule
- Groups Sue Department of Energy over Rejection of Light Bulb Energy Efficiency Standards
- EPA Reopens Comment Period for MON Risk and Technology Review Proposal
- EPA Files Respondent's Opening Brief in Litigation Challenging Its Denial of New York's Section 126 Petition
- EPA Issues Final Risk and Technology Review Standards for Several Source Categories
- EPA Publishes Final RTR Rule for Surface Coatings of Metal Cans and Metal Coil
- EPA Launches Agency Guidance Portal

PUBLIC INFORMATION

On-Going

- **Asbestos**

Mail outs of asbestos informational packages to Lane County residents who received building permits for remodeling projects and new homeowners. Residents are directed to contact LRAPA with any questions. Residents of the cities of Eugene, Springfield and Coburg now receive information with their permits. LRAPA will keep the local planning departments and contractors, upon request, stocked with the fliers so that they can help get the word out to residents who might encounter asbestos-containing materials while remodeling their homes.

- **General**

- Targeted Airshed Project: Oakridge AIR – *In Progress*
- Environmental Specialist Job Posting, Interviewing, Hiring – *Complete*
- Public Affairs Manager Job Posting, Interviewing, Hiring – *Complete*

UPCOMING LRAPA BOARD AGENDA ITEMS

This schedule outline is a preview of upcoming agenda items, and we will update it as the time frames for additional issues become firmer.

February 2020:

- ~~Elect board chair and vice chair.~~
- ~~Appoint new budget committee members and budget officer.~~
- ~~Succession planning update.~~

March 2020:

- First budget meeting on proposed budget for FY2021 (July 2020 – June 2021).
- Succession planning update.

April 2020:

- Second budget meeting on proposed budget for FY2021.
- Status report on Oakridge Woodsmoke Mitigation Project.

- Succession planning update.

May 2020:

- Adopt budget for FY2021 (July 2020 – June 2021).
- RFP/RFQ for Auditors.
- Succession planning update.

June 2020:

- Succession planning update.

July 2020:

- Status report on Oakridge Woodsmoke Mitigation Project.
- Succession planning update.

August 2020: No meeting.

September 2020:

- Succession planning update.

October 2020:

- Status report on Oakridge Woodsmoke Mitigation Project.
- Succession planning update.

November 2020:

- Succession planning update.

December 2020: No meeting.

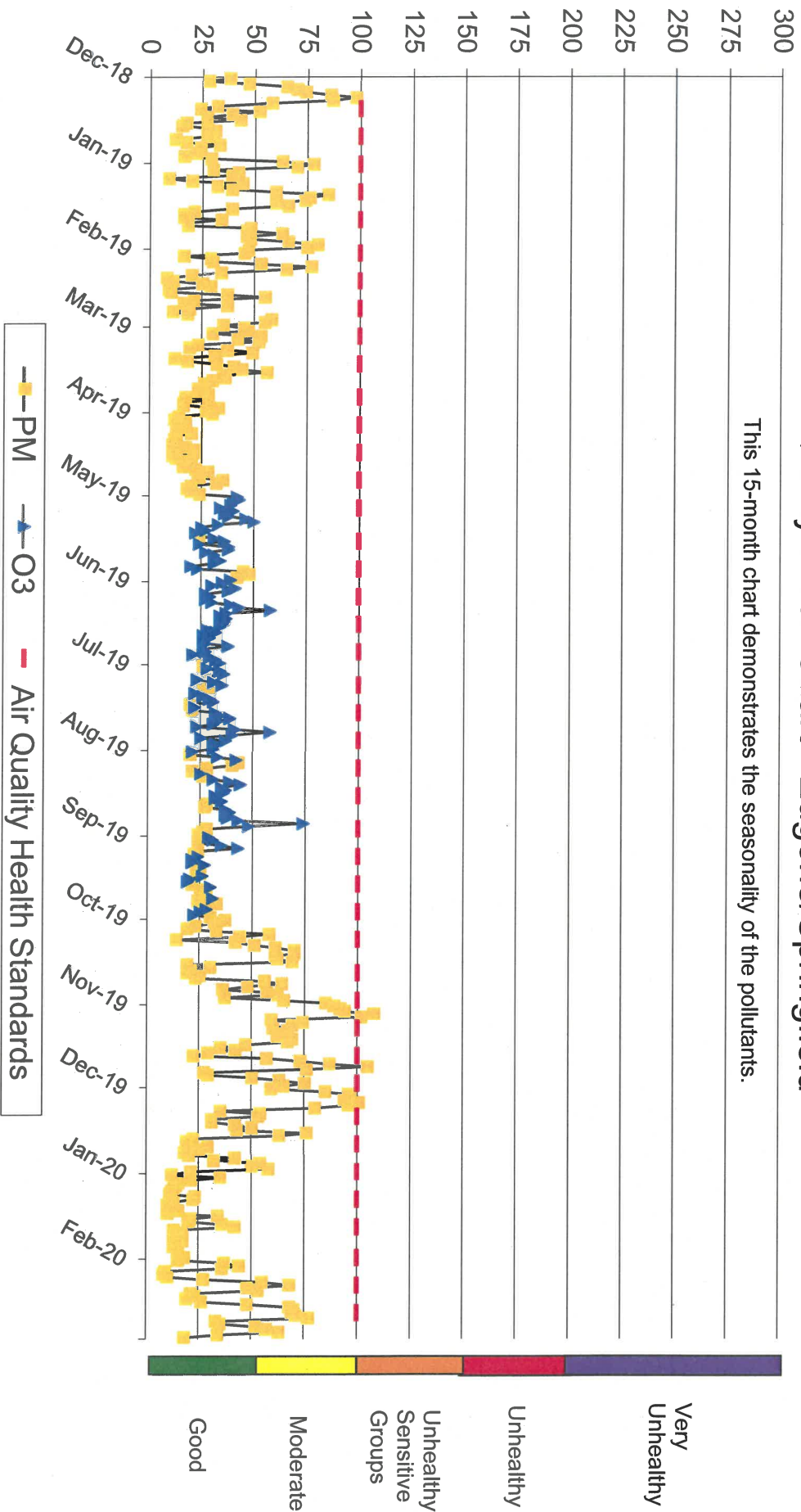
January 2021:

- Review multi-year budget forecast.
- Preview upcoming appointments on board and committees.
- Status report on Oakridge Woodsmoke Mitigation Project.

MLH/cmw

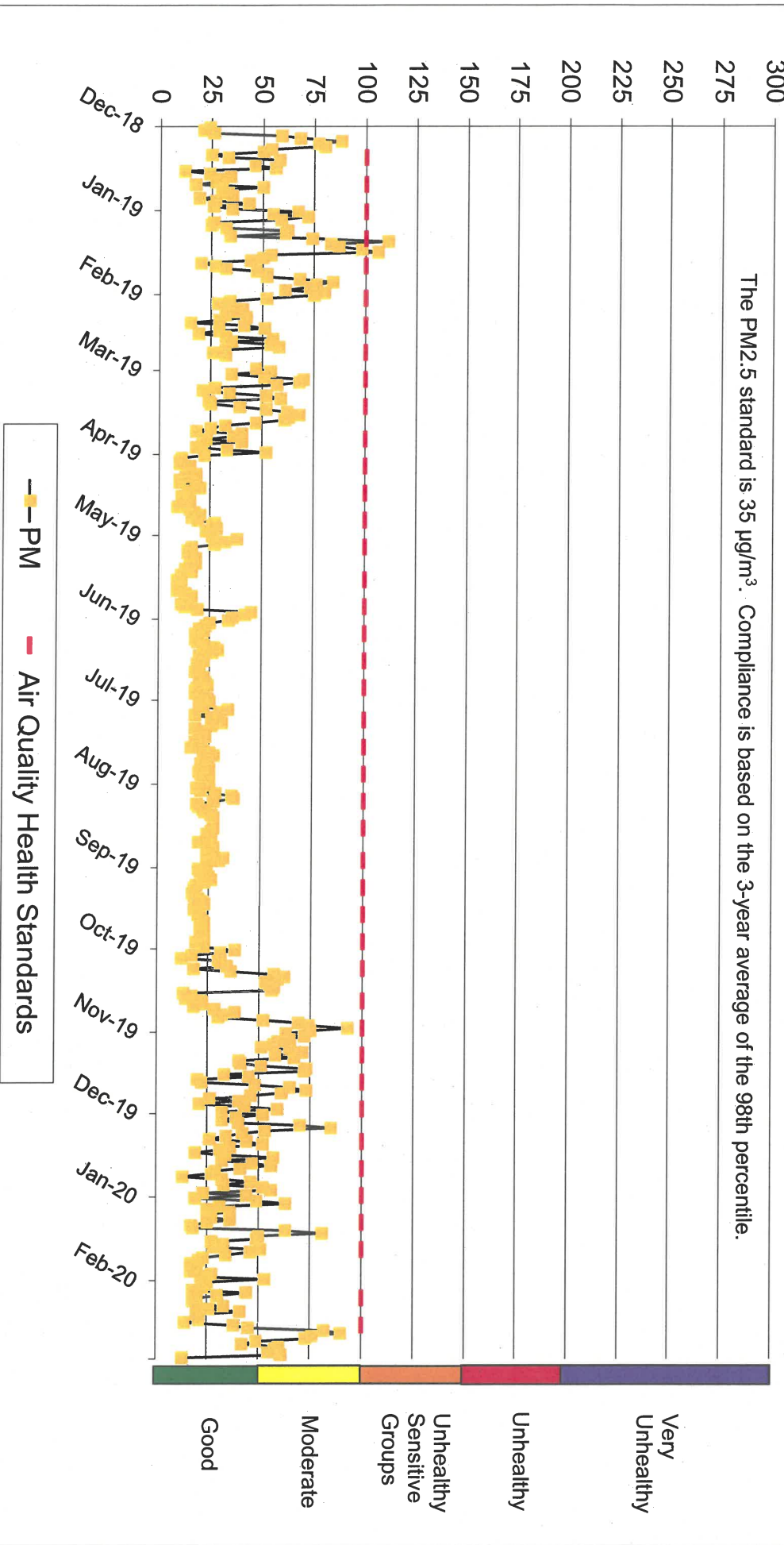
Air Quality Index Chart - Eugene/Springfield

This 15-month chart demonstrates the seasonality of the pollutants.



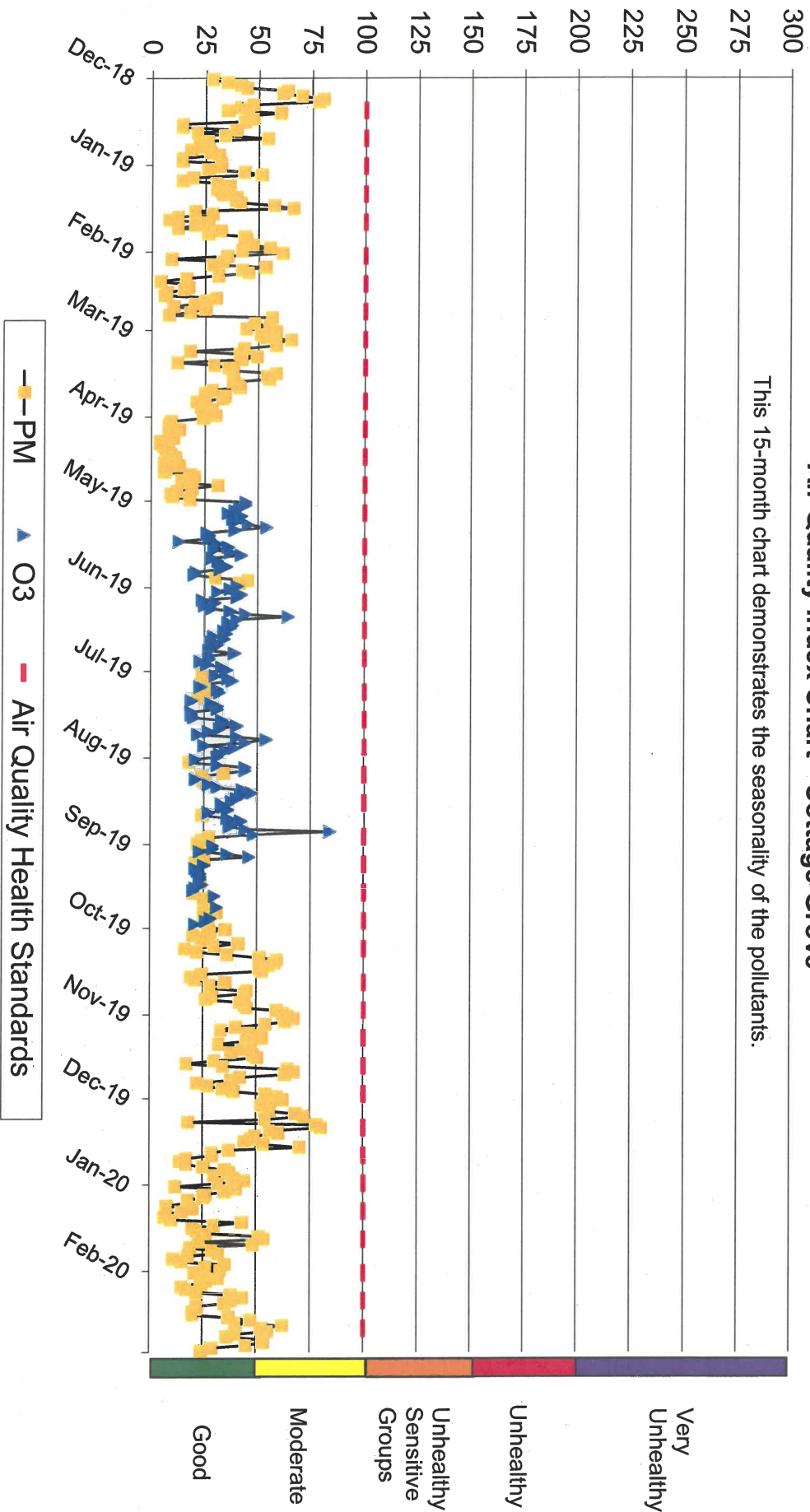
Air Quality Index Chart - Oakridge

The PM2.5 standard is 35 µg/m³. Compliance is based on the 3-year average of the 98th percentile.



Air Quality Index Chart - Cottage Grove

This 15-month chart demonstrates the seasonality of the pollutants.



NEW/OPEN ENFORCEMENT ACTIONS STATUS REPORT

02/01/2020 -- 02/29/2020

Report of open and actions initiated since last report

NEW: 02/01/2020 -- 02/29/2020

1. HARRIS, RYON (EUGENE)
 - A. Violation: Failure to promptly extinguish illegal outdoor burning; outdoor burning when prohibited; outdoor burning of prohibited materials; outdoor burning where prohibited; outdoor burning of construction/demolition waste where prohibited
 - B. Initial Action Taken: NON #3808 issued 02/01/2020
 - C. Subsequent Action: NCP #2020-3808 (\$600) issued 02/14/2020
 - D. Resolution: PENDING

2. J H BAXTER & CO (EUGENE)
 - A. Violation: Failure to conduct monthly monitoring of VPC-6 carbon efficiency/48 hour notification to LRAPA of conducting the monitoring - Permit Condition 16.a; Failure to evaluate the capture effectiveness of the ventilation hoods above work tanks/72 hour notice to LRAPA of conducting the monitoring permit condition 16.d; .
 - B. Initial Action Taken: NON #3810 issued 02/03/2020
 - C. Subsequent Action: PENDING
 - D. Resolution: PENDING

3. WOOD, JOSHUA T. (COTTAGE GROVE)
 - A. Violation: Outdoor burning when prohibited; outdoor burning of prohibited materials; outdoor burning such as to create a nuisance or hazard to public safety; outdoor burning adjacent to a flammable structure
 - B. Initial Action Taken: NON #3811 issued 02/10/2020
 - C. Subsequent Action: NCP #2020-3811 (\$650) issued 02/14/2020

- D. Resolution: PENDING
4. LITTEN, ED (VENETA)
- A. Violation: Failure to promptly extinguish illegal outdoor burning; outdoor burning when prohibited; outdoor burning such as to cause a public nuisance; outdoor burning of prohibited materials; outdoor burning of construction/demolition debris without first obtaining a letter permit from LRAPA
 - B. Initial Action Taken: NON #3813 issued 02/20/2020
 - C. Subsequent Action: PENDING
 - D. Resolution: PENDING
5. SPOTTEN, GORDON (VENETA)
- A. Violation: Failure to promptly extinguish illegal outdoor burning; outdoor burning when prohibited; outdoor burning such as to cause a public nuisance; outdoor burning of prohibited materials
 - B. Initial Action Taken: NON #3814 issued 02/20/2020
 - C. Subsequent Action: PENDING
 - D. Resolution: PENDING

ACTIONS PERFORMED (Enforcement actions issued prior to 02/01/2020 with subsequent action in the current reporting period):

1. EVANS, JASON (VENETA)
- A. Violation: Failure to provide for asbestos survey prior to commencing renovation or demolition of a facility; failure to abide by asbestos abatement notification and fee requirements; failure to abide by asbestos abatement negative pressure enclosure requirements; failure to adequately wet asbestos containing materials; failure to adequately clean project area at conclusion of abatement project; failure to secure asbestos containing waste at project site; open storage of asbestos containing waste; conducting an asbestos abatement without possessing a current license or certification; failure to abide by friable asbestos disposal requirements. Outdoor burning of prohibited materials

(asphalt roofing material linoleum, insulation); conducting the outdoor burning of construction/demolition debris without first obtaining appropriate permits.

- B. Initial Action Taken: NON #3758 issued 06/13/2019
 - C. Subsequent Action: NCP #2019-3758 (\$17,450) issued 06/17/2019: waiting for information regarding asbestos cleanup, if not complete by December; no response; Default Order Judgment (DOJ) for a lien on the property filed with Lane County
 - D. Resolution: CASE CLOSED on 02/05/2020
2. APRO, LLC DBA UNITED PACIFIC (SPRINGFIELD)
- A. Violation: The permit holder failed to submit performance test records to LRAPA to demonstrate compliance with triennial vapor balance system requirements outlined in Permit Condition 5.0. Permit Condition 7.2 requires submittal of performance test reports to LRAPA within 30 days of test completion.
 - B. Initial Action Taken: NON #3761 issued 05/02/2019
 - C. Subsequent Action: NCP #2019-3761 (\$2,382) issued 02/06/2020: Submitted TP 201.3 done on 2/4/20 and PV Vent Valve Data Sheet on 2/7/2020; test is under review
 - D. Resolution: PENDING
3. APRO, LLC DBA UNITED PACIFIC (SPRINGFIELD)
- A. Violation: The permit holder failed to submit performance test records to LRAPA to demonstrate compliance with triennial vapor balance system requirements outlined in Permit Condition 5.0. Permit Condition 7.2 requires submittal of performance test reports to LRAPA within 30 days of test completion.
 - B. Initial Action Taken: NON #3762 issued 05/02/2019
 - C. Subsequent Action: NCP #2019-3762 (\$2,382) issued 02/06/2020: Submitted TP 201.3 done on 2/4/20 and PV Vent Valve Data Sheet on 2/7/2020; test is under review
 - D. Resolution: PENDING

4. APRO, LLC DBA UNITED PACIFIC (EUGENE)
 - A. Violation: The permit holder failed to submit performance test records to LRAPA to demonstrate compliance with triennial vapor balance system requirements outlined in Permit Condition 5.0. Permit Condition 7.2 requires submittal of performance test reports to LRAPA within 30 days of test completion.
 - B. Initial Action Taken: NON #3763 issued 05/02/2019
 - C. Subsequent Action: NCP #2019-3763 (\$2,382) issued 02/06/2020: submitted test notification 2/7/20 scheduled for 2/13/2020; test is under review
 - D. Resolution: PENDING
5. BRB ENTERPRISES INC. (EUGENE)
 - A. Violation: The permit holder failed to submit performance test records to LRAPA to demonstrate compliance with triennial vapor balance system requirements outlined in Permit Condition 5.0. Permit Condition 7.2 requires submittal of performance test reports to LRAPA within 30 days of test completion.
 - B. Initial Action Taken: NON #3765 issued 05/02/2019
 - C. Subsequent Action: NCP #2019-3765 (\$2,382) issued 02/06/2020: submitted Vapor Testing Report 2/7/2020; test is under review
 - D. Resolution: PENDING
6. ELITE PETROLEUM MOBIL (SPRINGFIELD)
 - A. Violation: The permit holder failed to submit performance test records to LRAPA to demonstrate compliance with triennial vapor balance system requirements outlined in Permit Condition 5.0. Permit Condition 7.2 requires submittal of performance test reports to LRAPA within 30 days of test completion.
 - B. Initial Action Taken: NON #3766 issued 05/02/2019
 - C. Subsequent Action: NCP #2019-3766 (\$2,382) issued 02/06/2020: Submitted forms, that are under review

- D. Resolution: PENDING
7. RON'S OIL CO. (SPRINGFIELD)
- A. Violation: The permit holder failed to submit performance test records to LRAPA to demonstrate compliance with triennial vapor balance system requirements outlined in Permit Condition 5.0. Permit Condition 7.2 requires submittal of performance test reports to LRAPA within 30 days of test completion.
 - B. Initial Action Taken: NON #3767 issued 05/02/2019
 - C. Subsequent Action: NCP #2019-3767 (\$2,382) issued 02/06/2020: Submitted 2018 test on 2/7/2020; test is under review
 - D. Resolution: PENDING
8. SAI GOLDEN FOOD & GAS LLC (EUGENE)
- A. Violation: The permit holder failed to submit performance test records to LRAPA to demonstrate compliance with triennial vapor balance system requirements outlined in Permit Condition 5.0. Permit Condition 7.2 requires submittal of performance test reports to LRAPA within 30 days of test completion.
 - B. Initial Action Taken: NON #3768 issued 05/02/2019
 - C. Subsequent Action: NCP #2019-3768 (\$2,382) issued 02/06/2020
 - D. Resolution: PENDING
9. SPACE AGE FUEL, INC. #19 EUGENE (EUGENE)
- A. Violation: The permit holder failed to submit performance test records to LRAPA to demonstrate compliance with triennial vapor balance system requirements outlined in Permit Condition 5.0. Permit Condition 7.2 requires submittal of performance test reports to LRAPA within 30 days of test completion.
 - B. Initial Action Taken: NON #3769 issued 05/02/2019
 - C. Subsequent Action: NCP #2019-3769 (\$2,382) issued 02/06/2020

- D. Resolution: PENDING
10. THABET DBA BARGER ARCO AMPM (EUGENE)
- A. Violation: The permit holder failed to submit performance test records to LRAPA to demonstrate compliance with triennial vapor balance system requirements outlined in Permit Condition 5.0. Permit Condition 7.2 requires submittal of performance test reports to LRAPA within 30 days of test completion.
 - B. Initial Action Taken: NON #3772 issued 05/02/2019
 - C. Subsequent Action: NCP #2019-3772 (\$2,382) issued 02/06/2020
 - D. Resolution: PENDING
11. WOODBURY ENERGY CO (WECO EUGENE) (EUGENE)
- A. Violation: The permit holder failed to submit performance test records to LRAPA to demonstrate compliance with triennial vapor balance system requirements outlined in Permit Condition 5.0. Permit Condition 7.2 requires submittal of performance test reports to LRAPA within 30 days of test completion.
 - B. Initial Action Taken: NON #3778 issued 05/02/2019
 - C. Subsequent Action: NCP #2019-3778 (\$2,382) issued 02/06/2020; request for hearing received 2/25/2020 - TBA
 - D. Resolution: PENDING
12. VARGUS, RIGOBERTO (JUNCTION CITY)
- A. Violation: Outdoor burning when prohibited; outdoor burning such as to create a hazard to the public; outdoor burning of prohibited materials; outdoor burning of construction/demolition/commercial waste without first obtaining a letter permit from LRAPA
 - B. Initial Action Taken: NON #3805 issued 12/04/2019
 - C. Subsequent Action: NCP #2019-3805 (\$1,075) issued 12/27/2019: request for reduction approved and reduced to \$500 with signed SFO and payment schedule to begin March 15th.

D. Resolution: PENDING

13. COTTAGE GROVE RIDING CLUB (COTTAGE GROVE)

A. Violation: Failure to attend outdoor burning until extinguished; failure to promptly extinguish illegal outdoor burning; outdoor burning when prohibited; outdoor burning of prohibited materials; failure to conduct outdoor burning in an efficient manner; outdoor burning of construction/demolition/commercial waste without first obtaining a letter permit from LRAPA

B. Initial Action Taken: NON #3806 issued 12/18/2019

C. Subsequent Action: NCP #2019-3806 (\$1,450) issued 12/27/2019: request for reduction approved and reduced to \$625 with signed SFO - paid

D. Resolution: CASE CLOSED on 02/13/2020

14. ATEZ (EUGENE)

A. Violation: Failure to install a viewing window on friable asbestos abatement negative pressure enclosure; providing for or allowing an uncertified worker to engage in an asbestos abatement project.

B. Initial Action Taken: NON #3812 issued 01/28/2020

C. Subsequent Action: NCP #2020-3812 (\$4,400) issued 02/26/2020

D. Resolution: PENDING

PENDING (Enforcement actions issued prior to 02/01/2020 with no subsequent action in the current reporting period):

1. ROGERS, DAVID & SHANON (DORENA,)

A. Violation: Outdoor burning such as to create a nuisance; outdoor burning of prohibited materials (tires, insulation, RV parts)

B. Initial Action Taken: NON #3756 issued 04/04/2019

C. Subsequent Action: NCP #2019-3756 (\$750) issued 04/23/2019: request for hearing and/or reduction; reduction approved for \$500 with signed SFO sent 5/31/19; on schedule with payments

- D. Resolution: PENDING
2. AMERICAN LAMINATORS (SWISSHOME)
- A. Violation: Results from August 2018 stack test indicate particulate matter (PM) emissions of 0.172 gr/dscf; results from March 2019 stack test indicate PM emissions of 0.195 gr/dscf
 - B. Initial Action Taken: NON #3794 issued 07/11/2019 -conducted stack test in January 2020, results from test due by March 21, 2020.
 - C. Subsequent Action: PENDING
 - D. Resolution: PENDING
3. J.H. BAXTER (EUGENE)
- A. Violation: Respondent operated retort 81 as a process water evaporation unit without first notifying LRAPA and obtaining approval and that evaporate emissions were vented to ambient; operated retort 81 and bypassed emissions control unit; opened retort 83 containing creosote solution prior to fully evacuating the retort of the creosote solution and failed to notify LRAPA of the process upset; upset condition on October 5, 2019 on newly permitted Thermal Evaporator and failed to notify LRAPA of the upset condition.
 - B. Initial Action Taken: NON #3804 issued 10/29/2019
 - C. Subsequent Action: NCP #2019-3804 (\$8,000) issued 01/14/2020; request for reduction under review
 - D. Resolution: PENDING
4. WOLF, STEVEN A (EUGENE)
- A. Violation: Outdoor burning when prohibited; outdoor burning of prohibited materials; outdoor burning within Eugene city limits
 - B. Initial Action Taken: NON #3807 issued 01/13/2019
 - C. Subsequent Action: NCP #2020-3807 (\$350) issued 01/30/2020
 - D. Resolution: PENDING