



**LRAPA BOARD OF DIRECTORS
AGENDA ITEM SUMMARY**

Director's Report for July and August 2020

Meeting Date: September 10, 2020
Department: Director's Office
www.lrapa.org

Agenda Item No. 6
Staff Contact: Merlyn Hough
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AIR QUALITY: 07/01/2020 to 08/31/2020

July

Site	Date	Max AQI	Pollutant
Eug/Spfld	3-July-20	57	PM
Oak	4-July-20	59	PM
CottGrv	4-July-20	56	PM

AQI	Eug/Spfld	Oak	CottGrv	Range
Good	27	30	30	0-50
Moderate	4	1	1	51-100
USG	0	0	0	101-150
Unhealthy	0	0	0	151-200
Very Unhealthy	0	0	0	201-300

August

Site	Date	Max AQI	Pollutant
Eug/Spfld	15-Aug-20	87	O3
Oak	17-Aug-20	40	PM
CottGrv	15-Aug-20	80	O3

AQI	Eug/Spfld	Oak	CottGrv	Range
Good	28	31	30	0-50
Moderate	3	0	1	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 (July and August 2020)

Attachment No. 2: Air quality index charts for Oakridge (July and August 2020)

Attachment No. 3: Air quality index charts for Cottage Grove (July and August 2020)

COMPLAINTS: 07/01/2020 to 07/31/2020 [TOTAL: 42]

- Smoke** – 27 total smoke complaints: 27 for outdoor burning.
- Industry** – 3 total complaints: 1 for JH Baxter; 1 for Shell New Energies and 1 for topping off at a 76 Gas Station.
- Miscellaneous/Unknown/Dust** – 12 total miscellaneous complaints: 2 for asbestos; 1 for a diesel generator; 1 for diesel idling truck; 4 for fugitive dust and 4 for unknown odors.

COMPLAINTS: 08/01/2020 to 08/31/2020 [TOTAL: 63]

- Smoke** – 26 total smoke complaints: 24 for outdoor burning; 1 for home-wood heating and 1 for a grass fire.
- Industry** – 29 total complaints: 5 for JH Baxter; 10 for Shell New Energies; 10 for Lane Forest Products; 2 for Whitsell and 2 for Arlin.
- Miscellaneous/Unknown/Dust** – 8 total miscellaneous complaints: 1 for asbestos; 2 for fugitive dust and 5 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
Fugitive Dust	34	33	44	30	14	25	32	25	26	15	7
Ag/Field Burning	9	13	1	17	4	12	9	1	0	6	2
General Air Quality	2	6	6	26	30	15	20	14	6	12	4
Home Wood Heating	62	135	95	219	121	342	130	197	126	128	44
Industry	265	169	128	122	127	52	58	74	50	170	79
Outdoor Burning	268	341	268	321	279	251	266	281	351	402	306
Slash Burning	5	16	7	5	7	11	26	13	24	16	1
Miscellaneous	77	101	79	52	57	85	164	138	66	67	28
Unknown	12	25	17	14	35	46	56	63	29	39	61
Total	734	839	645	806	674	839	761	806	678	855	532

* Year-to-date.

ENFORCEMENT: 07/01/2020 to 08/31/2020

Category of Violation	New	Follow-Up Action	Pending	Closed	Total
Asbestos	-	-	-	-	-
Industrial	-	-	5	5	10
Outdoor Burning	-	-	7	1	8
Fugitive Dust	-	-	-	-	-
Home Wood Heating	-	-	-	-	-
Totals	-	-	12	6	18

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	10
Notices of Violation with Civil Penalties	39	42	29	23	28	37	37	28	43	37	21

*** Year-to-date.**

OUTDOOR BURNING LETTER PERMITS: 07/01/2020 to 08/31/2020

There were no Outdoor Burning Letter Permit (OBLP) issued in July and August.

ASBESTOS ABATEMENT: 07/01/2020 to 08/31/2020

During July and August, LRAPA received 77 notices of asbestos removal projects, ten of which were schools (Shasta Middle School, Oakridge School and O'Hara School – 2 projects).

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	293
School Asbestos Abatement Notices (NESHAP)	70	61	53	24	21	24	27	28	24	16	21
Number of Asbestos Abatements Inspected	107	106	90	96	67	89	82	120	77	94	58

*** Year-to-date.**

PERMITTING (TITLE V AND ACDP): 07/01/2020 to 08/31/2020

LRAPA currently permits 15 Title V sources and approximately 300 Air Contaminant Discharge Permits (ACDPs). 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	-	2	-	2
Renewals	7	13	-	20
Modifications	2	10	-	12
Constructions	-	-	-	-
Registrations	-	-	-	-
Terminated Permits	2	3	-	5
Issued Permits	15	35	-	50
*Total	26	63	-	89

* 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, from most recent to oldest.

Week of August 22-28, 2020

See: <http://www.4cleanair.org/sites/default/files/Documents/WashingtonUpdate-2020-08-28.pdf>

- CARB Adopts Heavy-Duty Omnibus Regulation Supported by NACAA
- EPA Publishes Proposed Boiler MACT Amendments, Seeks Public Comment
- EPA Announces Final Rule Amending Marine Diesel Engine Standards
- Study Flags Need for Further Investigation of Air Quality During Pandemic Lockdowns
- Bipartisan Congressional Group Seeks Withdrawal of EPA Methane Rule
- Senate Democrats Unveil Climate Plan
- Massachusetts Senators Demand Answers on EPA's COVID-19 Enforcement Policy
- New Jersey Files Reply Brief in D.C. Circuit Challenge to EPA's "Reasonable Possibility" NSR Recordkeeping Rule
- PFAS Incineration Research Program Pulled
- EPA Opens 30-Day Public Comment Period on Intended Round 4 SO₂ Area Designations
- EPA Publishes Announcement of September 17 Public Hearing on Aircraft GHG Proposal; Pre-Registration Required to Speak or Listen

Week of August 15-21, 2020

See: <http://www.4cleanair.org/sites/default/files/Documents/WashingtonUpdate-2020-08-21.pdf>

- EPA Publishes Aircraft GHG Proposal, Sets October 19 Comment Deadline
- California and Five Automakers Officially Sign Bilateral Voluntary Agreements to Reduce Light-Duty Vehicle GHG Emissions

- EPA Releases Draft Swine Air Emission Models for Animal Feeding Operations
- Diverse Coalition's Letter May Herald Momentum for Energy Package on the Hill
- D.C. Circuit Declines to Reconsider Decision Upholding SILs Guidance

Week of August 8-14, 2020

See: <http://www.4cleanair.org/sites/default/files/Documents/081420wklyupdate.pdf>

- NACAA Comments in Support of EPA Proposal to Adjust Vehicle Test Procedures for Tier 3 Certification Fuel and In Opposition to Alternative That Would Reduce Stringency of Vehicle CO₂ Standards
- EPA Finalizes Two Rules Weakening Oil and Gas Sector NSPS
- EPA Publishes Proposal to Retain Current Ozone Standards Without Revision, Sets Two Public Hearings and October 1 Comment Deadline
- EPA Issues Remaining SO₂ Designations, Proposes to Redesignate Four Areas from Round 2
- Former EPA Administrators Say It Is Time to "Reset the Future Course" of EPA
- EPA Reopens Nominations for Science Advisory Board Until August 31
- Petitioners File Opening Brief in D.C. Circuit Case Challenging Deadline Delay for MSW Landfill State Plans
- States Will Sue DOE for Tardy Efficiency Standards
- Ninth Circuit Rejects Latest Industry Bid to Move Cities' Climate Suit to Federal Court
- Research Group Assesses GHG Emissions Impacts of Voluntary Multistate Heavy-Duty ZEV MOU and California Agreements with Five Automakers on Car Standards
- EPA Publishes Final MON Air Toxics Rule
- EPA Proposes Amendments to NSPS and NESHAP for Other Solid Waste Incineration Units
- EPA Publishes Final Risk and Technology Review Standards for Plywood and Composite Wood Products
- EPA Publishes Final Risk and Technology Review Standards for Miscellaneous Coating Manufacturing

Week of August 1-7, 2020

See: <http://www.4cleanair.org/sites/default/files/Documents/080720wklyupdate.pdf>

- EPA Finalizes Guidance on Plantwide Applicability Limitations in NSR Permitting
- D.C. Circuit Schedules Oral Argument on Affordable Clean Energy Rule
- Democrats' "Climate Equity Act" Would Address Environmental Justice
- Senate Republicans Advance Nuclear Power Proposal
- House Hearing Highlights Avoided Deaths from Limiting Climate Damage
- EPA Seeks Input on Control Cost Manual Update

Week of July 25-31, 2020

See: <http://www.4cleanair.org/sites/default/files/Documents/073120wklyupdate.pdf>

- NACAA Comments on Cost-Benefit NPRM

- Researchers Find Communities That Were the Most Polluted by PM_{2.5} in 1981 Remain Most Polluted Today
- Environmental Justice for All Act Introduced in Senate
- Legislation to Expand Air Quality Monitoring Introduced in House and Senate
- Inspector General Begins Self-Initiated Evaluation of EPA's Actions on Final "SAFE" Vehicles Rule Part 2
- EPA Inspector General Recommends Improved Oversight of State Implementation of Municipal Solid Waste Landfill Rules
- ACE Rule Opponents File Reply Briefs in D.C. Circuit
- New York AG's Office Puts Lowe's and Hearth, Patio, and Barbeque Association on Notice over Sale of Noncompliant Residential Wood Heaters
- EPA Agrees to Proposed Consent Decree with Schedule for Updating Certain NSPS and NESHAPs
- Updated Air Quality Life Index Shows Scant Progress to Reduce Particulate Pollution Globally
- White House Offers FERC Nominees
- EPA Publishes Risk and Technology Review Standards for Taconite Iron Ore Processing

Week of July 18-24, 2020

See: <http://www.4cleanair.org/sites/default/files/Documents/072420wklyupdate.pdf>

- House of Representatives Approves FY 2021 Appropriations Legislation with EPA Funding
- EPA Finalizes Reforms to Environmental Appeals Board Permit Review Process
- EPA Announces Aircraft GHG Proposal
- States, Cities and Counties Sue EPA Over MATS Rule
- Industry Groups Defend NSR "Reasonable Possibility" Recordkeeping Rule in D.C. Circuit Brief
- Inspector General Faults EPA on COVID-19, State and Local Oversight and Environmental Justice
- 2019 Methane Flaring Hit Highest Global Levels in a Decade
- EPA Issues Minor Reporting Revisions for MATS
- EPA Publishes Final Risk and Technology Review Standards for Two Source Categories
- Senate Democrats Hold Hearing on Decarbonizing the U.S. Transportation Sector

Week of July 11-17, 2020

See: <http://www.4cleanair.org/sites/default/files/Documents/071720wklyupdate.pdf>

- EPA Administrator Proposes to Retain Current Ozone NAAQS Without Revision
- EPA to Take More Time to Develop NPRM for Highway Heavy-Duty Low NOx Program
- House Appropriations Committee Advances FY 2021 Funding Bill
- States Enter into Memorandum of Understanding to Accelerate Electrification of Trucks and Buses
- EPA to Consider Flexibilities and Alternate Approaches for Diesel Engine Makers Facing "COVID-Related Impediments" to Complying with Certification and Compliance Requirements

- Senator Duckworth Questions Delay in Publication of Final MON Toxics Rule
- White House Finalizes Changes to NEPA
- D.C. Circuit Vacates and Remands EPA's Denial of New York's Section 126 Petition
- EPA Defends NSR "Reasonable Possibility" Recordkeeping Rule in D.C. Circuit Brief
- Sierra Club Seeks Rehearing of Its D.C. Circuit SILs Challenge
- Biden Introduces Clean Energy and Infrastructure Plan
- EPA Announces Final Revisions to Regulations for Minimum Emission Reporting Requirements in SIPs
- EPA Publishes RTR for Integrated Iron and Steel

Week of July 5-10, 2020

See: <http://www.4cleanair.org/sites/default/files/Documents/071020wklyupdate.pdf>

- NACAA Files Amicus Brief in D.C. Circuit Cases Concerning EPA's and NHTSA's "One National Program" Rule
- NACAA Opposes EPA Proposal to Allow Continued Sale of "Step 1" Residential Wood Heaters Beyond May 15 NSPS Compliance Deadline
- Proposed House Appropriations Would Increase State/Local Air Grants
- EPA Proposes Amendments to Boiler MACT to Address Court Remand
- Senators Call Upon EPA to Perform Residual Risk and Technology Review for EtO Sterilizers
- EPA Publishes Air Toxics Risk and Technology Review Final Rules
- House Clean Energy Standard Proposal Could Drive Net-Zero Electricity Emissions by 2037
- Biden Campaign Unity Panel Issues Climate Recommendations
- Decision Keeps Climate Suit in Colorado State Court
- Virginia Joins RGGI
- Report: Pandemic-Driven Greenhouse Gas Reductions Come At High Economic Cost
- Crushed Rock Could Assist Future Negative Emissions Efforts

Week of June 27 - July 3, 2020

See: <http://www.4cleanair.org/sites/default/files/Documents/070320wklyupdate.pdf>

- NACAA Asks EPA Administrator to Withdraw PM NAAQS Proposal
- Study Further Bolsters Evidence of Causal Link Between PM2.5 Exposure and Premature Death
- NACAA Opposes Proposed "Technical" Amendment to Heavy-Duty Vehicle and Engine Test Procedures That Would Allow Significant Increase in CO2 Emissions
- NACAA Comments on Fuels Regulatory Streamlining Proposal, Recommends Improvements
- EPA To Terminate COVID-19 Enforcement Discretion Policy by August 31, 2020
- House Select Committee Releases Sweeping Climate Roadmap
- Petitioners Challenging NHTSA's and EPA's Preemption and Withdrawal of Waivers for California's GHG and ZEV Standards File Opening Briefs in D.C. Circuit
- EPA Announces July 13 Public Hearing on Proposal to Adjust Vehicle Test Procedures for Tier 3 Certification Fuel

- Clean Air Act Does Not Require EPA to Conduct Follow-Up Residual Risk Reviews of Technology-Based Standards for Hazardous Air Pollutants, Federal Court Holds
- Final RTR for Cellulose Products Manufacturing Published in Federal Register
- OMB Adds Updates to Unified Agenda
- DC's Kelly Crawford named as NACAA Program Funding Committee State Co-Chair

PUBLIC INFORMATION – Travis Knudsen

On-Going

July & August were productive months for LRAPA.

Public outreach and information efforts by LRAPA's Public Affairs department included many items. The 2019 Annual Report was published in late July. The report is hosted on our website and was set to subscribers of our email list for agency updates. LRAPA published a "How to burn Properly Video" (produced by Hearth Patio & Barbeque Association) with Oakridge Air branding. This effort saved the time and money which otherwise would have been used to produce a video of our own.

Additional Public Affairs staff time was allocated to social media outreach efforts. In the last 28 days LRAPA has grown 15 new followers on Facebook with a reach of 4,859 and public engagement of 465. LRAPA plans to grow a network on the Nextdoor Social Media platform in the coming months.

Other notable public affairs items: LRAPA published information on recreational fires and summertime limits on Outdoor Burning in the Laurel Hill Valley Citizen's neighborhood association. Public Affairs staff judged artwork for the 2020 Upstream mural project hosted by the City of Springfield.

Three media interviews were conducted over July and August discussing topics ranging from general LRAPA operations to COVID-19 impacts on air, and air quality in Lane County vs other counties with fires burning in the state.

LRAPA published three new webpages on our website. The first is a more visible placement of LRAPA's public calendar featuring upcoming meetings and public notices. An enforcement page was created as a resource for the community to find enforcement actions and updates made by the Agency more easily. Finally, a new COVID-19 operations page was created to better inform the public on LRAPA's altered operations amid the global pandemic.

Program management efforts from the public affairs department found success over the last two months. Public affairs finalized and submitted our PM10 Grant memo to the Oregon Department of Environmental Quality. The public affairs manager applied for the Lane Climate Change Advisory Committee; applicants accepted to be notified in early September. The agency conducted an all-staff training which reviewed LRAPA's Grievance Policy, Public Participation Policy, Limited English Proficiency Plan, and Access for Persons with Disabilities Plan.

A Supplemental Environmental Project (SEP) was published to our website for future opportunities to fund wood debris removal efforts in Oakridge. More purple air sensors continue to be installed. 16 of 20 sensors have been delivered to locations in Oakridge in association with the TAG. Of those 16, seven are operational. Public Affairs is working with hosts to activate all remaining sensors.

Home Wood Heating applications were updated for the new year and mailed out to last year's list. Our approval letter is in the process of being translated to Spanish. LRAPA continues to work closely with SWFC on the creation of a Community Response Plan (CRP) for the Oakridge/Westfir airshed. Efforts continue with Good Company on assembling and beginning the Oakridge Air program.

Media Contacts

7/10/2020	KXCR – LRAPA General Info & Operations
7/17/2020	KVAL – COVID-19 Phase 1 vs Phase 2 on Air Quality
8/21/2020	KLCC – Wildfire Smoke in Lane county vs other counties

Meetings/Events

7/4	Pre-Proposal videoconference, Oakridge Air Energy Auditor
7/7	Wildfire Smoke Challenge: Creating Clean Air Spaces
7/13	LRAPA-GC: Oakridge Air Check-in
7/13	EPA/LRAPA/ODEQ Check-in
7/14	ODF Smoke Management, Fall Burn and COVID-19
7/14	Oakridge CRP – Communications Meeting
7/15	LRAPA Nondiscrimination Training Meeting
7/16	Webinar – Making the Financial Case for Battery Electric Buses
7/16	City of Springfield City Club
7/20	Establish SEP for Oakridge Air
7/20	LRAPA/DEQ - Oakridge OB Alternatives
7/21	Webinar – Air Toxics in the U.S.
7/21	Wildfire Smoke Challenge: Creating Clean Air Spaces
7/22	Oakridge Air: COVID and Smoke - Health Connection
7/23	NACAA Webinar – Re-Opening Your Agency
7/27	LRAPA-GC: Oakridge Air Check-in
7/29	Oakridge Air: StoryMaps/Communications Meeting
7/31	Webinar - Marketing Your Event to the Media and Public
8/4	Materials Management Grant FAQ for General Public
8/5	Electrify America - Meeting for Submission Process
8/5	Beyond Toxic Webinar: Right to Clean Air
8/7	Oakridge Air: StoryMaps Progress meeting
8/10-12	Oregon Conformity Virtual Workshop
8/10	LRAPA-GC: Oakridge Air Check-in
8/10	EPA/LRAPA/ODEQ Check-in
8/17	State meeting on O3 impact on AQ

8/18	Webinar — Particulate Matter Modeling & Control Programs
8/19	Wildfire Smoke Challenge: Creating Clean Air Spaces
8/19	Oakridge CRP — Communications Meeting
8/20	Webinar — Managing Your COVID-19 Communications
8/21	Oregon Wildfire Smoke Response Call
8/24	Oregon Wildfire Smoke Response Call
8/24	Electric Vehicle Event Exploratory Meeting
8/24	LRAPA-GC: Oakridge Air Check-in
8/24	TAG Check-in with EPA
8/25	TAG Residential Upgrade Decision Matrix
8/26	NACAA Criteria Pollutants Committee
8/27	Oakridge CRP — Communications Meeting
8/27	Oregon Wildfire Smoke Response Call
8/27	Oakridge Air: Residential Energy Efficiency Auditor
8/27	LRAPA/DEQ COVID-19 Operational Plans meeting

Press Releases

n/a	No press released were issued in July/August
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General Programs and Projects

- Annual Report (TK) *Completed*
- ECRO Review - Staff Training Doc by EPA (TK, KE) *Completed*
- TAG Grant Progress (MH, NM, LG, TK) *In progress*
- PM10 Grant Memo for ODEQ (TK) *Completed*
- Purple Air Sensors in Oakridge (TK) *In progress*
- Improved Calendar Page on LRAPA.org (TK) *Completed*
- Create Enforcement Page on LRAPA.org (TK) *Completed*
- Improved Calendar Page on LRAPA.org (TK) *Completed*
- Community Response Plan for Oakridge TJK(TK) *In Progress*

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.

July 2020:

- ~~Status report on Oakridge Woodsmoke Mitigation Project.~~
- ~~Succession planning update.~~
- ~~Budget updates.~~
- ~~Potential alternative allocations of civil penalties.~~

August 2020: No meeting.

September 2020:

- Succession planning update.
- Budget updates.

October 2020:

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

November 2020:

- Succession planning update.
- Budget updates.

December 2020: No meeting.

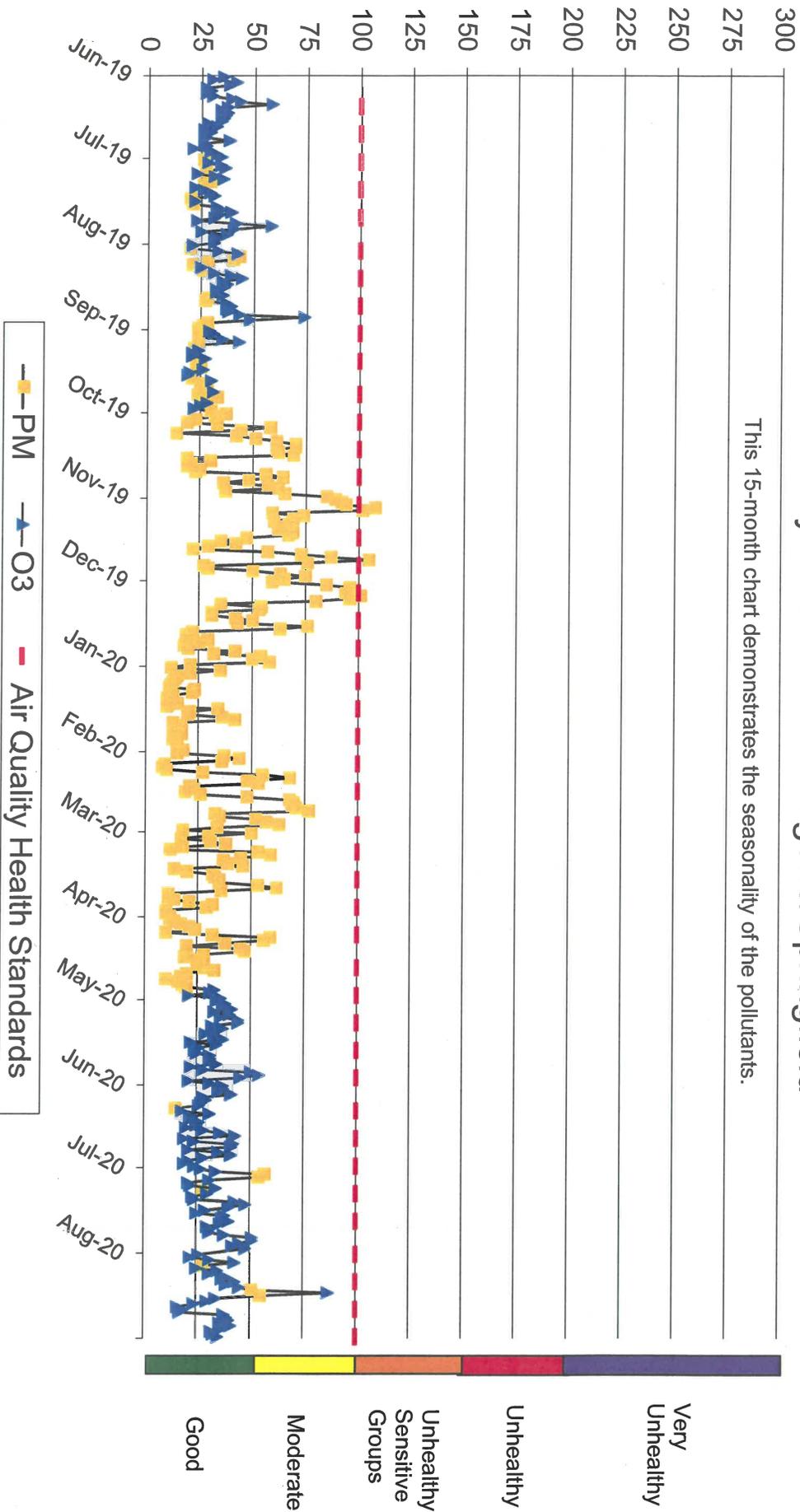
January 2021:

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

MLH/cmw

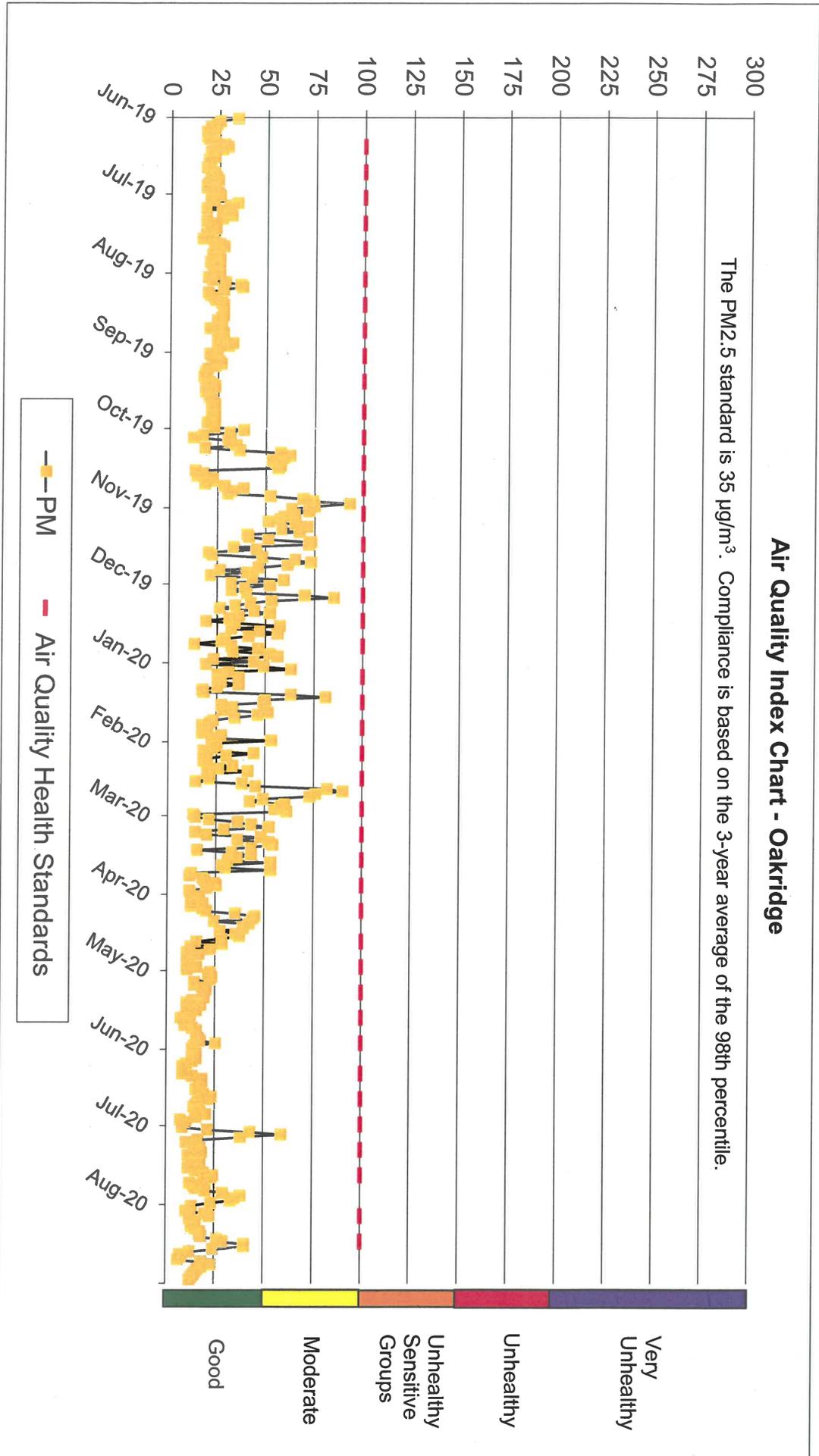
Air Quality Index Chart - Eugene/Springfield

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



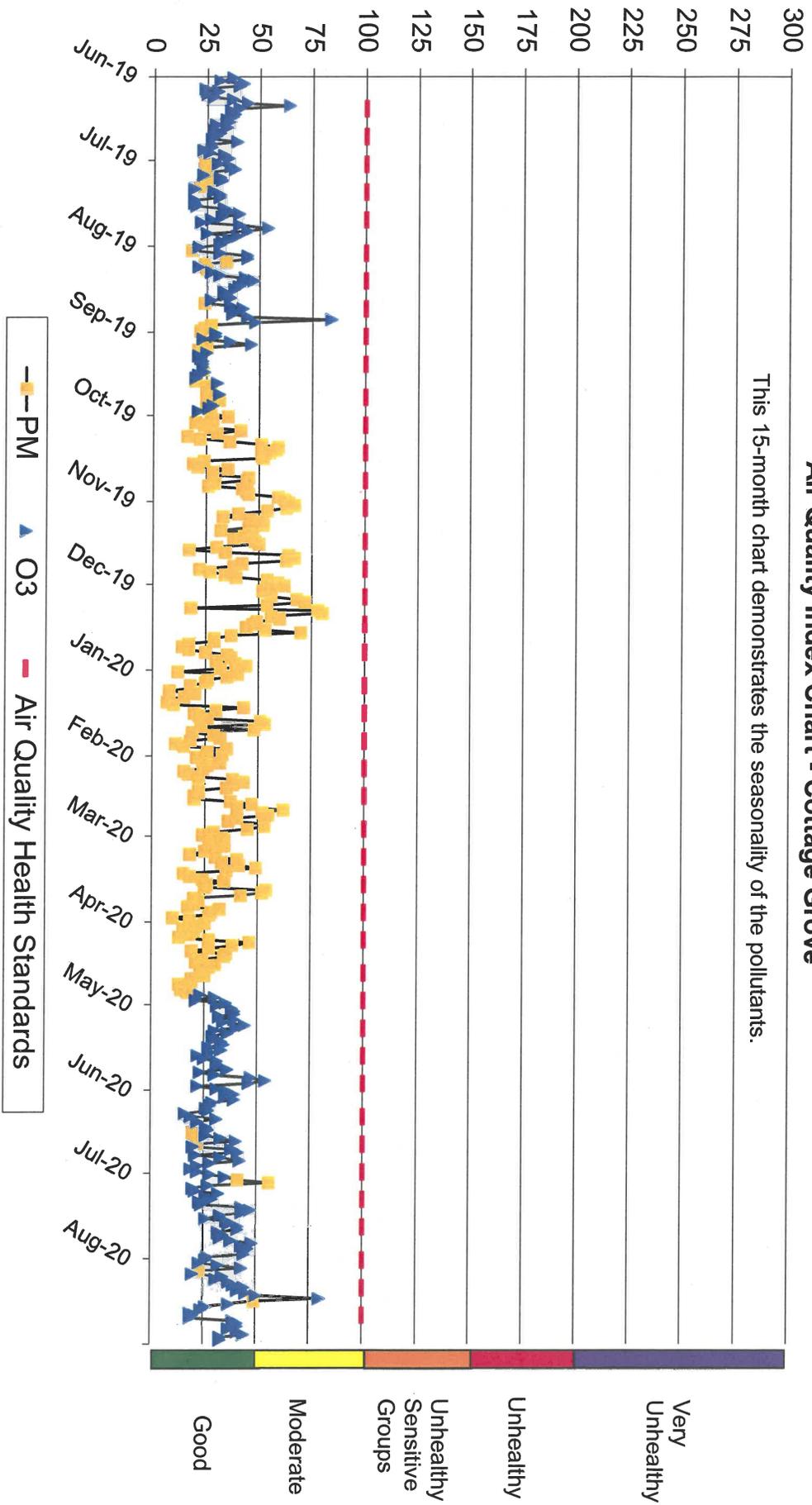
Air Quality Index Chart - Oakridge

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

07/01/2020 -- 08/31/2020
Report of open and actions initiated since last report

ACTIONS PERFORMED (Enforcement actions issued prior to 07/01/2020 with subsequent action in the current reporting period):

1. 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: Received Vapor Testing Report 02/07/2020; request for reduction approved and reduced to \$670 with signed SFO - paid
 - D. Resolution: CASE CLOSED on 08/24/2020
2. 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: request for reduction approved to \$670 with signed SFO - paid
 - D. Resolution: CASE CLOSED on 07/06/2020
3. 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: submitted one test required, request for reduction approved for the economic benefit amount of the cost of the test \$670 and signed SFO - paid

- D. Resolution: CASE CLOSED on 07/06/2020
4. 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: request for reduction approved for economic benefit amount of \$670 with signed SFO - paid
 - D. Resolution: CASE CLOSED on 07/10/2020: Test report due 06/08/19
5. J.H. BAXTER (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 scheduled and observed 7/2/2020.
 - B. Initial Action Taken: NON #3810 issued 02/03/2020
 - C. Subsequent Action: 07/02/2020 LRAPA observed and monitored capture effectiveness test
 - D. Resolution: CASE CLOSED on 08/15/2020
6. STANDFORD-CLARK, DIANE (COTTAGE GROVE)
- A. Violation: outdoor burning of prohibited materials; outdoor burning of construction/demolition waste without first obtaining a letter permit from LRAPA.
 - B. Initial Action Taken: NON #3819 issued 05/15/2020
 - C. Subsequent Action: NCP #20-3819 (\$1,000) issued 05/27/2020: request for reduction approved to \$375 with signed SFO - paid
 - D. Resolution: CASE CLOSED on 07/20/2020:

PENDING (Enforcement actions issued prior to 07/01/2020 with no subsequent action in the current reporting period):

1. 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 02/07/2020; request for reduction approved and reduced to \$670 with signed SFO issued 06/19/2020
 - D. Resolution: PENDING
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 #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 2/7/20 under review
 - D. Resolution: PENDING
3. 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 2/13/20 under review
 - D. Resolution: PENDING

4. 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 2/7/20 under review
 - D. Resolution: PENDING
5. 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
6. 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 (\$1075) issued 12/27/2019: request for reduction approved and reduced to \$500 with signed SFO and payment schedule; on schedule with payments
 - D. Resolution: PENDING

7. 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 #20-3807 (\$350) issued 01/30/2020; no response, Default Order Judgment (DOJ) in process
 - D. Resolution: PENDING
8. 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 #20-3808 (\$600) issued 02/14/2020; no response, Default Order Judgment (DOJ) in process
 - D. Resolution: PENDING
9. 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 #20-3811 (\$650) issued 02/14/2020; no response, Default Order Judgment (DOJ) in process
 - D. Resolution: PENDING
10. 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: NCP #20-3813 (\$2,025) issued 03/17/2020: request for hearing - TBA; Settlement proposal offer 5/29/2020 for \$875, response due 06/22/2020; no response, Default Order Judgment (DOJ) in process
 - D. Resolution: PENDING
11. CROSMAN, ZACKERY RYAN (EUGENE)
- A. Violation: Outdoor burning such as to create a nuisance; outdoor burning of prohibited materials
 - B. Initial Action Taken: NON #3815 issued 05/08/2020
 - C. Subsequent Action: NCP #20-3815 (\$700) issued 05/27/2020; no response, Default Order Judgment (DOJ) in process
 - D. Resolution: PENDING
12. JONES, ANTHONY R. (VENETA)
- A. Violation: Failure to promptly extinguish illegal outdoor burning; outdoor burning when prohibited; outdoor burning such as to create a nuisance; outdoor burning of prohibited materials (grass clippings); failure to conduct outdoor burning in an efficient manner
 - B. Initial Action Taken: NON #3818 issued 05/15/2020
 - C. Subsequent Action: NCP #20-3818 (\$700) issued 05/27/2020; request for hearing scheduled for 11/13/2020
 - D. Resolution: PENDING