

# LRAPA BOARD OF DIRECTORS AGENDA ITEM SUMMARY

## **Director's Report for March 2020**

Meeting Date: April 9, 2020 Agenda Item No. 7

Department: Director's Office Staff Contact: Merlyn Hough

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AIR QUALITY: 03/01/2020 to 03/31/2020

#### March

Site	Date	Date Max AQI			
Eug/Spfld	21-Mar-20	62	PM		
Oak	12-Mar-20	54	PM		
CottGrv	20-Mar-20	54	PM		

AQI	Eug/Spfld	Oak	CottGrv	Range
Good	27	26	29	0-50
Moderate	4	5	2	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 (March 2020)

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

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

COMPLAINTS: 03/01/2020 to 03/31/2020 [TOTAL: 66]

1. **Smoke** – **46** total smoke complaints: 36 for outdoor burning; 9 for home-wood heating and 1 for slash burning.

2. **Industry** – **8** total complaints: 3 for JH Baxter; 2 for International Paper; 1 for 9 Wood; 1 for Lane County Short Mountain Landfill and 1 for Zip-O-Logs.

3. **Miscellaneous/Unknown/Dust – 12** total miscellaneous complaints: 1 for asbestos; 1 for grass fire; 1 for Marijuana odor; 1 for train exhaust; 1 for fugitive dust; 2 for general air quality; 1 for contrails and 4 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	1
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	2
HomeWoodHeating	62	135	95	219	121	342	130	197	126	128	26
Industry	265	169	128	122	127	52	58	74	50	170	34
Outdoor Burning	268	341	268	321	279	251	266	281	351	402	86
Slash Burning	5	16	7	5	7	11	26	13	24	16	1
Miscellaneous	77	101	79	52	57	85	164	138	66	67	14
Unknown	12	25	17	14	35	46	56	63	29	39	20
Total	734	839	645	806	674	839	761	806	678	855	184

<sup>\*</sup> Year-to-date.

ENFORCEMENT: 03/01/2020 to 03/31/2020

Category of Violation	New	Follow-Up Action	Pending	Closed	Total
Asbestos	-	-	1	-	1
Industrial	-	-	13	-	13
Outdoor Burning	-	2	4	1	7
Fugitive Dust	-	-	-	-	-
Home-Wood Heating	-	-	-	-	-
Totals	-	2	18	1	21

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	7
Notices of Violation with Civil Penalties	39	42	29	23	28	37	37	28	43	37	16

<sup>\*</sup> Year-to-date.

# OUTDOOR BURNING LETTER PERMITS: 03/01/2020 to 03/31/2020

There were no Outdoor Burning Special Letter Permits (OBLP) issued in March.

## ASBESTOS ABATEMENT: 03/01/2020 to 03/31/2020

During March, LRAPA received 43 notices of asbestos removal projects, one of which was a school (Oakridge School).

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	119
School Asbestos Abatement Notices (NESHAP)	70	61	53	24	21	24	27	28	24	16	2
Number of Asbestos Abatements Inspected	107	106	90	96	67	89	82	120	77	94	26

<sup>\*</sup> Year-to-date.

# PERMITTING (TITLE V AND ACDP): 03/01/2020 to 03/31/2020

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	-	3	-	3
Renewals	8	18	-	26
Modifications	2	2	-	4
Constructions	-	1	-	1
Registrations	-	-	-	-
Terminated Permits	-	2	-	2
Issued Permits	7	13	-	20
*Total	17	39	-	56

<sup>\*</sup> Year-to-date.

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#### **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 <u>Washington Update</u> every Friday. Here are the weekly highlights from recent weeks, from most recent to oldest.

But first these timely words from NACAA Executive Director Miles Keough this past week:

Clean air agencies,

Like many of you, the NACAA team is working remotely and stumbling through the challenges, joys, and occasional ridiculousness of being stuck at home. Three weeks ago we didn't mention anything about COVID-19 in our Washington Update; this week it's in half our Washington Update stories. A lot of our agencies are part of state and local public health agencies (you're the actual Front Line, and we appreciate you so much!) It's getting closer to home too: we're pulling for several EPA staff who have come down with it (as have my both of my sisters, who are thankfully past the worrying part now.) We've all got a long stretch ahead of us, and yet already I find myself asking when we can get back to "normal". Some things have been worth discovering: plenty of those meetings \*could\* have been emails after all; homeschooling my kids has been bananas but I've learned so much doing it; and in the time I used to spend commuting, I've found time to get into a book on the lives of Greek philosophers! And I've definitely come to appreciate even more how lucky America is to have a group of the smartest, most committed people – you working hard to protect the health of our neighbors and our communities. On the other side of this, what will "normal" even look like? Maybe we'll emerge with healthier habits, stronger teams, closer families, broadened perspectives, and a deeper appreciation by our leaders and partners about the work you do. "No man steps in the same river twice" that's Heraclitus - "for it is not the same river, and he is not the same man."

Friends, be kind, stay safe; be brave, stay well! My thanks for all you do, Miles

## Week of March 21-27, 2020

See: <a href="http://4cleanair.org/sites/default/files/Documents/032720wklyupdate.pdf">http://4cleanair.org/sites/default/files/Documents/032720wklyupdate.pdf</a>

- NACAA Will Hold Virtual Spring Membership Meeting in May
- EPA Issues COVID-19 Memo Effecting Temporary but Broad Enforcement Discretion; Environmental Groups Respond
- EPA Issues Draft "Begin Actual Construction" Guidance for NSR Permitting
- API Seeks Relief for Oil and Natural Gas Industry Amid COVID-19 Pandemic; EPA
   Temporarily Waives Summertime Gasoline Volatility Requirements and Promises
   Additional Relief
- EPA Extends Application Deadline for Exchange Network Grants
- EPA IG to Evaluate Status of SIP Submittals and Approvals
- Congress Passes Massive Pandemic Relief Package
- Senate EPW Considers HFC Phase-Out Bill Without Formal Hearings

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 Petitioners and Petitioner-Intervenors File Reply Briefs in Litigation Challenging EPA's Denial of New York's Section 126 Petition

- EPA Publishes Final Risk and Technology Review Standards for Municipal Solid Waste Landfills
- NACAA Requests Comment Period Extension for Supplemental Proposed Science Transparency Rule

# Week of March 14-20, 2020

See: http://4cleanair.org/sites/default/files/Documents/032020wklyupdate.pdf

- EPA's Supplemental "Science Transparency" Proposal Published in Federal Register with April 17 Public Comment Deadline
- Court Rejects DOJ Arguments Against California-Quebec Carbon Trading Program
- EPA Extends Application Deadline for 2020 Community-Scale Air Toxics Monitoring Grants
- EPA Extends Deadline for Targeted Airshed Grant Applications until April 10, 2020
- Researchers Analyze Impact of Ozone and Climate Change on Perennial Crop Yields
- EPA Publishes Final Risk and Technology Review Standards for Vegetable Oil Production and Boat Manufacturing and Reinforced Plastic Composites Production
- Former Air Appointee Returns to EPA as Chief of Staff

#### Week of March 7-13, 2020

See: http://4cleanair.org/sites/default/files/Documents/031320wklyupdate.pdf

- NACAA Cancels Spring Membership Meeting, Virtual Sessions Planned
- NACAA Issues COVID-19 Resources Including Continuity of Operations Planning Guidance and Checklist
- EPA Issues Notice of Failure to Submit State Plans for MSW Landfills for 42 States and Territories
- EPA Finalizes Wood Heating Device NSPS
- NACAA Submits Written Testimony on FY 2021 Appropriations to Senate
- Justice Department Eliminates Supplemental Environmental Projects in Civil Settlements with Private Parties
- D.C. Circuit Orders EPA to Reconsider MATS Startup Provisions
- EPA to Initiate Lead NAAQS Review
- EPA Issues Final Risk and Technology Review Standards for Multiple Source Categories
- EPA Publishes Final Risk and Technology Review Standard for Combustion Turbines
- EPA Publishes Final Risk and Technology Review Standards for Asphalt Processing and Roofing
- Researchers Publish Analysis of Correction Method for Low-Cost Particle Sensors

#### Week of February 29 – March 6, 2020

See: http://4cleanair.org/sites/default/files/Documents/030620wklyupdate.pdf

- NACAA Submits Written Testimony on FY 2021 Appropriations
- EPA Issues Supplemental Science Transparency Proposal

- Long-term Air Pollution Exposure Causes 8.8 Million Premature Deaths Annually, Study Finds
- EPA Science Advisory Board Finds "Significant Weaknesses" in Scientific Basis of Proposed SAFE Rule
- Senate Moves Toward Vote on New Energy Legislation
- EPA Administrator Testifies Before House Appropriations Subcommittee on Proposed FY 2021 Budget
- Senator Carper Asks EPA IG to Investigate Whether EPA Is Circumventing Rulemaking Requirements for SAFE Vehicles and Science Transparency Rules
- House Science Subcommittee Advances Bill to Require Study on the Science of Background Ozone in U.S.
- EPA Issues Automotive Trends Report for 2019
- EPA Publishes Progress Report on Power Sector Programs
- Respondent-Intervenor and Amicus Briefs filed in Litigation Challenging EPA's Denial of New York's Section 126 Petition

#### **PUBLIC INFORMATION – Travis Knudsen**

#### **On-Going**

**COVID-19** has had a substantial impact on LRAPA's day-to-day dealings. On March 18<sup>th</sup> LRAPA closed the office to non-appointment foot traffic, at this time about half of staff members began to work from home on a full-time basis. Operations were limited further on March 24<sup>th</sup> after Governor Kate Brown's stay-at-home order. The remainder of LRAPA's staff began working from home. Currently all but two staff members work primarily from home with an occasional visit to LRAPA's office for essential items which can't be completed remotely.

Despite an altered workflow, LRAPA remains operational. Compliance and complaint response efforts continue. Title V and ACDP permitting work continues as well. Permitting staff have prioritized the processing of constructions notices, permit modifications, and new permit applications during this time. Monitoring and data control continue as normal. Homewood heating and outdoor burning programs continue to function as well.

COVID-19 has cancelled or postponed many events and meetings for LRAPA. Many – such as the Home Show – are large outreach opportunities for the agency. Alternative public education opportunities, particularly in a virtual space are being researched and brainstormed.

#### <u>Asbestos</u>

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.

#### **Media Contacts**

3/12	KMTR - Winter-Springtime Allergies
3/20	RG – Traffic pollution on health

# **Meetings/Events**

3/06	TAG meeting with the Good Company & EPA
3/11	Air Quality Forecaster Collaboration Call
3/11	Seneca Sawmill Walkthrough
3/12	Budget Advisory Committee Meeting
3/12	Board of Directors Meeting
3/13	LRAPA COVID-19 Planning
3/14	Home Show booth – Canceled due to COVID-19
3/16	Smoke School – Canceled due to COVID-19
3/17	Besties EV Dinner – Postponed due to COVID-19
3/19	Statewide Conformity Conference Call
3/19	Seneca Public Hearing – Postponed due to COVID-19
3/20	TAG meeting with the Good Company & EPA
3/23	EPA/LRAPA/ODEQ Check-in
	Citizens Advisory Com. meeting – Canceled due to COVID-
3/24	19
3/30	TAG meeting with only the Good Company

#### **Press Releases**

3/16	Seneca Sawmill Public Hearing Postponed
3/18	Modifying operations due to COVID-19
3/24	Ending non-essential functions in response to COVID-19

# General Programs and Projects

- Take inventory, clean, and organize office (TK) Completed
- Create/Order business cards & IDs for new staff (TK) Completed
- Continue New-Homeowner Packets with QSL (TK) Completed
- Correct LRAPA's name and map location online (TK) Completed
- Compile Grant 105 workplan (Merlyn, Nasser, Max, Lance, TK)
   Completed
- Prepare for Budget/Board meetings on ZOOM (TK) *In progress*
- Finish up ECRCO policies doc (Katie, TK) *In progress*
- TAG Grant Progress (Merlyn, Nasser, Lance, TK) In progress
- 2019 Annual Report (TK) *In progress*

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#### **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.

#### 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:

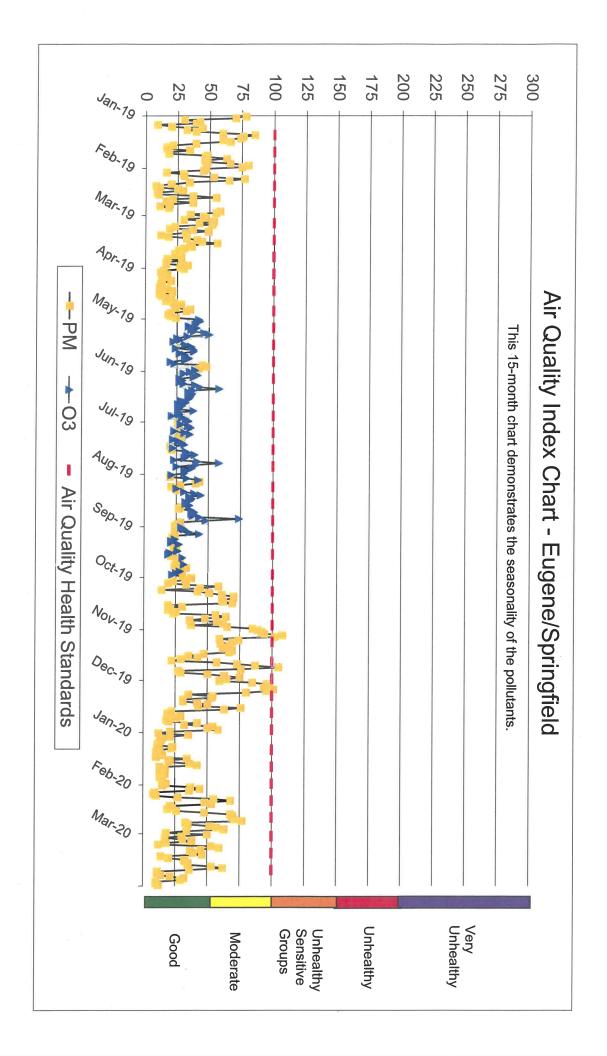
Succession planning update.

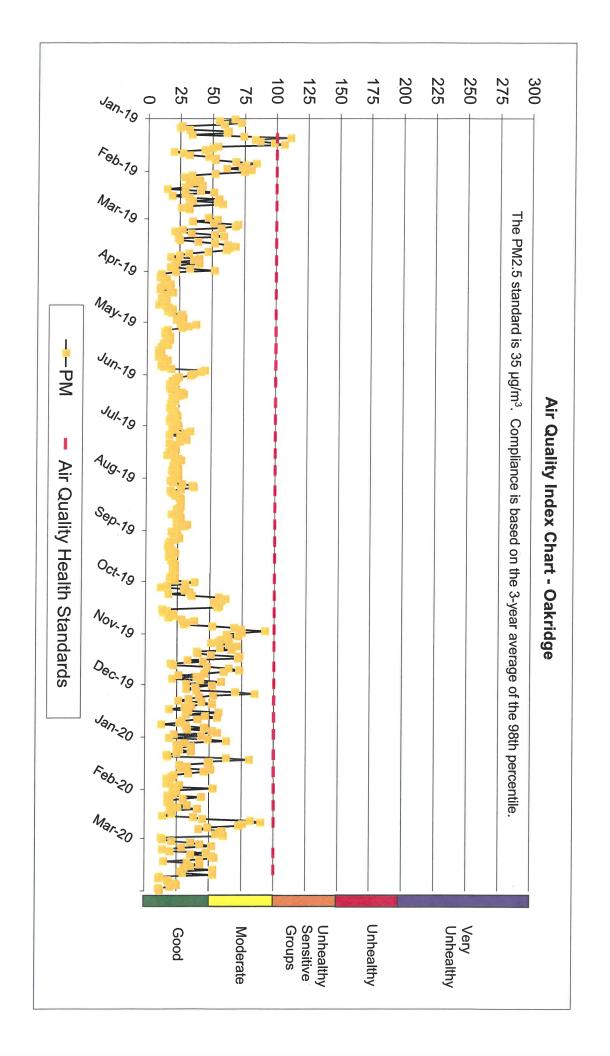
December 2020: No meeting.

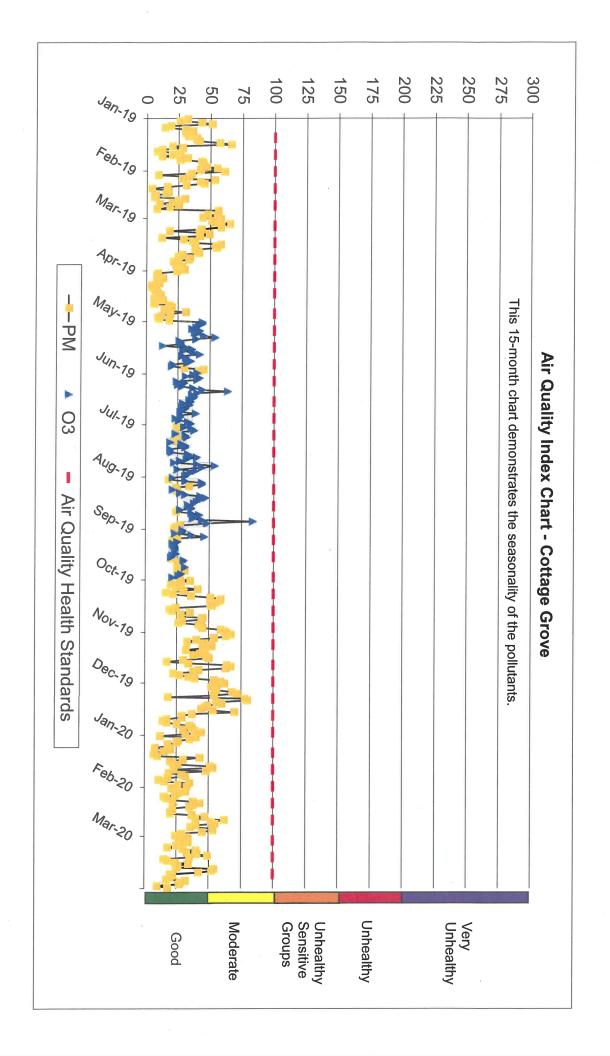
## January 2021:

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

#### MLH/cmw







# **NEW/OPEN ENFORCEMENT ACTIONS STATUS REPORT**

# 03/01/2020 -- 03/31/2020 Report of open and actions initiated since last report

**NEW ENFORCEMENT ACTIONS: -0-**

# ACTIONS PERFORMED (Enforcement actions issued prior to 03/01/2020 with current 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 paid
  - D. Resolution: CASE CLOSED on 03/10/2020

# PENDING (Enforcement actions issued prior to 03/01/2020 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 2/7/20 and is under review
  - 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 and is 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 and is under review
- D. Resolution: PENDING

## 4. 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 2/7/20 and is under review
- D. Resolution: PENDING
- 5. 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 and is under review
  - D. Resolution: PENDING
- 6. 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 and is under review
  - D. Resolution: PENDING
- 7. 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

D. Subsequent Action: NCP #2019-3768 (\$2,382) issued 02/06/2020

D. Resolution: PENDING

#### 8. 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

## 9. 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

# 10. 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
- D. Resolution: PENDING

## 11. 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 (0.14 gr/dscf limit)
- B. Initial Action Taken: NON #3794 issued 07/11/2019
- C. Subsequent Action: Conducted Stack Test on 1/23/2020; submitted test results on March 4, 2020; report under review
- D. Resolution: PENDING

## 12. 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; meeting with JHB on March 5, 2020; JHB to submit actions supporting request for reduction
- D. Resolution: PENDING

## 13. 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; on schedule with payments
- D. Resolution: PENDING

#### 14. 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

## 15. 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; no response, Default Order Judgment (DOJ) for a lien on the property in process
- D. Resolution: PENDING

## 16. 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;
- B. Initial Action Taken: NON #3810 issued 02/03/2020
- C. Subsequent Action: PENDING

- D. Resolution: PENDING
- 17. 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; no response, Default Order Judgment (DOJ) for a lien on the property in process
  - D. Resolution: PENDING
- 18. 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; request for hearing TBA
  - D. Resolution: PENDING
- 19. 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 3/17/20
  - D. Resolution: PENDING

# 20. 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: NCP #20-3814 (\$600) issued 3/17/20
- D. Resolution: PENDING