



LRAPA BOARD OF DIRECTORS AGENDA ITEM SUMMARY

Director's Report for January 2021

Meeting Date: February 25, 2021 Department: Director's Office www.lrapa.org Agenda Item No. 10 Staff Contact: Merlyn Hough Contact Telephone: 541-736-1056 x 216

AIR QUALITY: 01/01/2021 to 01/31/2021

January

Site	Date	Max AQI	Pollutant
Eug/Spfld	20-Jan-21	89	PM
Oak	20-Jan-21	81	PM
CottGrv	23-Jan-21	68	PM

AQI	Eug/Spfld	Oak	CottGrv	Range
Good	26	25	24	0-50
Moderate	5	6	7	51-100
USG	0	0	0	101-150
Unhealthy	0	0	0	151-200
Very Unhealthy	0	0	0	201-300
Hazardous	0	0	0	201-300

Attachment No. 1: Air quality index charts for Eugene/Springfield (January 2021) Attachment No. 2: Air quality index charts for Oakridge (January 2021) Attachment No. 3: Air quality index charts for Cottage Grove (January 2021)

COMPLAINTS: 01/01/2021 to 01/31/2021 [TOTAL: 52]

- 1. **Smoke 23** total smoke complaints: 15 for outdoor burning; 6 for home wood heating; and 2 for general air quality.
- 2. Industry 14 total complaints: 13 for JH Baxter, and 1 for Lane County Short Mountain Landfill.
- 3. **Miscellaneous/Unknown/Dust 15** total miscellaneous complaints: 4 for fugitive dust; 2 for odor from idling trains; 1 for marijuana; 1 for autobody spray painting operation; 1 for fermenting hay operation; and 6 unknown odors.

Year	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	*2021
Fugitive Dust	33	44	30	14	25	32	25	26	15	17	4
Ag/Field Burning	13	1	17	4	12	9	1	0	6	2	0
General Air Quality	6	6	26	30	15	20	14	6	12	4	2
Home Wood Heating	135	95	219	121	342	130	197	126	128	74	6
Industry	169	128	122	127	52	58	74	50	170	100	14
Outdoor Burning	341	268	321	279	251	266	281	351	402	423	15
Slash Burning	16	7	5	7	11	26	13	24	16	12	0
Miscellaneous	101	79	52	57	85	164	138	66	67	59	5
Unknown	25	17	14	35	46	56	63	29	39	74	6
Total	839	645	645	806	839	761	806	678	855	765	52
									;	* Year-to	data

For perspective, here is how the total number of complaints received for calendar year 2021 compares to previous years:

* Year-to-date.

ENFORCEMENT: 01/01/2021 to 01/31/2021

Category of Violation	New	Follow-Up Action	Pending	Closed	Total
Asbestos	-	-	-	1	1
Industrial	-	1	-	1	2
Outdoor Burning	1	1	10	-	12
Fugitive Dust	-	-	-	-	-
Home Wood Heating	-	-	-	-	-
Totals	1	2	10	2	15

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 2021 compares to previous years:

Year	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	*2021
Notices of Non-											
compliance and											
Warnings	64	41	51	36	38	41	39	41	55	15	1
Notices of Violation with											
Civil Penalties	42	29	23	28	37	37	28	43	37	26	1

* Year-to-date.

OUTDOOR BURNING LETTER PERMITS: 01/01/2021 to 01/31/2021

There were no Outdoor Burning Letter Permits (OBLPs) issued in January.

ASBESTOS ABATEMENT: 01/01/2021 to 01/31/2021

During January, LRAPA received 37 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 2021 compares to previous years:

Year	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	*2021
Total Asbestos Abatement Notices	357	324	351	352	426	444	543	428	488	439	37
School Asbestos Abatement Notices (NESHAP)	61	53	24	21	24	27	28	24	16	25	0
Number of Asbestos Abatements Inspected	106	90	96	67	89	82	120	77	94	93	3

* Year-to-date.

PERMITTING (TITLE V AND ACDP): 01/01/2021 to 01/31/2021

LRAPA currently permits 14 Title V sources and approximately 300 Air Contaminant Discharge Permit (ACDP) sources. Below are the total numbers of permit activities that are new, renewals, modifications, construction approvals, registration applications, terminated and/or issued permits the Operations staff currently have in process.

Category of Permit Activity	Title V	ACDP	Registration	Total Active
New	-	3	-	3
Renewals	6	14	-	20
Modifications	-	3	-	3
Constructions	-	-	-	-
Registrations	-	-	-	-
Terminated Permits	-	-	-	-
Issued Permits	1	4	-	5
*Total	7	24	-	31

* 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 <u>Washington Update</u> every Friday. Here are the weekly highlights from recent weeks.

Week of January 2-8, 2021

See: <u>http://www.4cleanair.org/sites/default/files/Documents/WashingtonUpdate-2021-01-08.pdf</u>

- EPA Finalizes "Science Transparency" Rule
- Congress Passes and President Signs FY 2021 Appropriations Law
- EPA Publishes Final Decision, Effective Immediately, to Retain Current Ozone NAAQS Without Revision
- EPA Finalizes Federal Adoption of International GHG Emission Standards for Aircraft; No Environmental Benefits Will Result
- Former Environmental Commissioners Provide Recommendations to EPA Administrator-Nominee
- EPA Formally Announces Availability of MOVES3 Emissions Model for Mobile Sources; FR Publication Will Trigger Two-Year Grace Period Before Use of Model Is Required
- EPA Releases Final Guidance on CAA Section 179B International Transport Demonstrations
- EPA Announces Final Amendments for Heavy-Duty Engine and Vehicle Test Procedures, Including Provision That Will Weaken Stringency of Phase 2 Engine GHG Standards; Issues Supplemental NPRM to "Improve" GEM
- EPA Issues 2020 Automotive Trends Report
- EPA Completes Fourth and Final Round of SO2 Designations
- Study Based on Causal Modeling Approach Associates Increased Death Rates with Exposure to PM2.5 at Levels Below NAAQS
- Minnesota Moves Forward with Clean Car Standards
- Massachusetts, Connecticut, Rhode Island and D.C. Launch "Groundbreaking" Multi-Jurisdictional Initiative to Reduce Transportation-Related Air Pollution
- EPA Finalizes NSR "Error Corrections" Rule
- EPA Proposes Risk and Technology Review Standards for Three Source Categories

Week of January 9-15, 2021

See: <u>http://www.4cleanair.org/sites/default/files/files/documents/WashingtonUpdate-2021-01-15.pdf</u>

- Biden Nominates Former NACAA Member Janet McCabe to Be EPA Deputy Administrator
- EPA Establishes Significance Threshold for Regulating GHG Emissions from All Source Categories Under CAA Section 111 and Finalizes "Significant Contribution" Finding for Electric Generating Units
- DOJ Puts Additional Limits on Environmental Settlements
- Petitioners Challenging "SAFE" Rule Part 2 File Opening Briefs
- EPA Defends Methane Rescission Rule in D.C. Circuit Brief
- Environmental Groups File Lawsuit Targeting "Science Transparency" Rule
- Seventeen States and a Local Jurisdiction Sue EPA over Final Decision to Retain "Insufficient" PM NAAQS Without Revision
- Thirteen States Challenge EPA's Final Aircraft GHG Rule
- D.C. Circuit Declines to Stay Portions of Oil and Gas NSPS Reconsideration Rule
- EPA Solicits Applications for 2021 DERA Grants; Sets March 16 Submittal Deadline

- EPA Issues Toxics Release Inventory Information for 2019
- EPA Publishes Final Rule Adopting GHG Emission Standards for Aircraft; No Environmental Benefits Will Result
- Survey Finds Mixed Progress on ACE Rule Implementation
- EPA Proposes to Approve Petition to Remove Portion of Maine from Ozone Transport Region
- Researchers Conclude Wildfire Smoke Responsible for as Much as Half of PM_{2.5} in Western U.S.
- National Academies Recommend Actions to Reduce Lead Emissions from Piston-Engine Aircraft
- EPA Issues Final Amendments to NSPS for Volatile Organic Liquid Storage Vessels
- EPA Proposes Revisions to Municipal Solid Waste Landfills Air Toxics Rule
- EPA Proposes Multiple Risk and Technology Review Standards

Week of January 16-22, 2021

See: <u>http://www.4cleanair.org/sites/default/files/Documents/WashingtonUpdate-2021-01-22.pdf</u>

- NACAA Sends Biden-Harris Administration Recommendations on Clean Air, Climate Priorities
- Far-Reaching Executive Orders Issued on Biden's First Day
- Biden Team Makes Key Agency Appointments and Names Early Acting Leadership Pending Political Nominations and Confirmations
- D.C. Circuit Strikes Down Affordable Clean Energy Rule
- Led by New York and California, States and Cities File Slew of Lawsuits Challenging Air-Related Trump Administration Rules
- Environmental Groups Sue and Seek Reconsideration of "Major MACT to Area" Rule Rescinding "Once-In-Always-In" Policy
- Amicus Briefs Challenging "SAFE" Rule Part 2 Filed in D.C. Circuit
- Sale of Non-Compliant Residential Wood Heaters No Longer a "Low Enforcement Priority," EPA Announces
- Outgoing Administration Recommends Cuts to FY 2021 Funding for EPA Programs
- EPA Reopens Comment Period on Proposed Amendments to Polyvinyl Chloride and Copolymers Production Regulations

Week of January 23-29, 2021

See: <u>http://www.4cleanair.org/sites/default/files/Documents/WashingtonUpdate-2021-01-29.pdf</u>

- Biden Administration Issues Sweeping Executive Orders On "Climate Day"
- GM Announces Plans to Become Carbon Neutral by 2040
- D.C. Circuit Issues Opinion in Case Challenging 2015 and 2018 Ozone NAAQS Implementation Rules
- U.S. District Court Delays Effective Date of EPA's "Science Transparency" Rule; Expresses "Significant Doubt" About Rule's Legality
- More Legal Challenges Filed Against CAA Rules Issued in Final Weeks of Trump Administration
- NRDC, Sierra Club Challenge NHTSA Interim Final Rule Delaying Increases in Civil Penalties for Automakers that Fail to Comply with Fuel Economy Standards
- In Court Actions, VW Challenges State & Local Pollution Regulatory Authority
- Energy Nominee Granholm Faces Senate Confirmation Hearing
- EPA Reaches Settlement Agreement with Dow Chemical and Subsidiaries to Reduce Emissions from Flaring at Louisiana and Texas Chemical Plants
- Researchers Conclude Corn Ethanol Emits 46 Percent Less GHGs than Gasoline
- Corporate Clean Energy Purchases Reached New Peak in 2020

PUBLIC INFORMATION – Travis Knudsen

On-Going

January was a busy and productive month for LRAPA's Public Affairs department.

Home Wood Heating season remains in full swing for LRAPA, fortunately an active weather pattern has prevented prolonged periods of inversion in both Eugene/Springfield and Oakridge. 1 "Yellow" HWH advisory was issued for the Eugene/Springfield area and 5 "Yellow" HWH advisories were issued for Oakridge over January.

LRAPA's Public Affairs coordinated with the Monitoring department throughout December on the process for determining yellow and red advisories in Lane County. Beginning in 2021, Public Affairs began sharing the responsibility of monitoring the forecast and issue HWH advisories dependent on current Air Quality levels and the forecast.

LRAPA worked with Oakridge partners and stakeholders, as well as utilized the "Oakridge Air" branding on social media, to increase community awareness of yellow advisories issued in Oakridge. LRAPA public affairs coordinated with Compliance Staff and external stakeholders, such as the Oakridge Police Department to strengthen communication and information channels regarding Yellow and Red day in Oakridge.

Public Affairs staff continue to work with the Oregon Department of Environmental Quality, Oregon Health Authority, local community members, and others to engage the community in meaningful ways. To answer and address concerns related elevated levels of dioxins collected in dirt samples along roadways in a neighborhood near J.H. Baxter & Co. The second community engagement meeting that involved members of the Bethel neighborhood took place at the end of January. More meetings will happen in preparation of a bigger public meeting in the late spring/early summer of 2021.

Work continues improving information to the public. LRAPA's public calendar has been modified to a better and easier to read format by using a google embedded calendar. LRAPA public affairs and monitoring departments are working with LCOG on to update our contract with CivicPlus and receive a website redesign in 2021.

Media Contacts	Date	Media	Person	Торіс	
	None	None	None	none	

Meeting/Events	1/4	CAO meeting with LRAPA, MFA, and JHB
	1/5	Jira task Force DEQ meeting for Holiday Farm Fire Cleanup
	1/6	Oakridge Air Communications Meeting
	1/7	Monthly Air Toxics Technical and Communications Call with DEQ
	1/8	MPO/Transit Providers/ODOT Meeting
	1/11	EPA/LRAPA/ODEQ Check-in
	1/11	Oakridge Air Meeting with EPA
	1/12	Springfield Gov't Committee Meeting
	1/12	LRAPA Outdoor Burning - Meeting No. 3 with CAC
	1/12	LRAPA Board Member Matt Keating introduction

1/12	NACAA Public Outreach Committee Call
1/13	Oakridge Air & LRAPA Compliance coordination meeting
1/13	Oakridge Air: Smoke, Health and Safety Workgroup
1/14	January LRAPA Board meeting
1/14	Wood Smoke and Diesel with Deborah Kafoury
1/15	Oakridge Air & LRAPA Compliance coordination meeting – Call with Officer Valeri Miller
1/19	Springfield Gov't Committee Meeting
1/20	Smoke Management Advisory Committee Meeting
1/20	Invitation: Oakridge Air: Smoke, Health and Safety Workgroup
1/21	LRAPA Outdoor Burning - Meeting No. 4 with CAC
1/21	HWH Compliance Response Call
1/21	JHB Coordinating Agency Technical Team
1/22	Springfield City Club
1/25	Oakridge Air - LRAPA/Good Company check in
1/26	Citizens Advisory Committee
1/28	JHB Community Engagement Core Team Meeting
1/28	U.S. EPA: The Science Behind the AirNow Sensor Data Pilot
1/28	Coordination Call with Kurt Hodgen and Strategic Government Resources
1/28	JHB Coordinating Agency Technical Team

Press Releases

"YELLOW" Home Wood Heating advisory issued for Eugene/Springfield and1/20Oakridge

General Programs and Projects

- Oakridge Air Progress (MH, NM, LG, TK) In progress
- Purple Air Sensors in Oakridge (TK) *In progress*
- Community Response Plan for Oakridge (TK) In Progress
- Coordinate with DEQ/Lane County on Asbestos Cleanup (TK, AS, RR) In Progress
- Indoor Air Quality webpage (TK) Completed
- Continued JHB Community Engagement Meeting (TK, MH) Completed

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.

January 2021:

- Preview upcoming appointments on board and committees.
- Review multi-year budget forecast for FY2021-2025.
- Approve dues request to IGA partners for FY2022.
- Succession planning update executive session.

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February 2021:

- Elect Board Chair and Vice-Chair.
- Appoint new budget committee members and budget officer.
- Status report on Oakridge Air Project (postponed from January).
- Review multi-year budget forecast for FY2021-2025 (continued).
- Succession planning update (if needed).

March 2021:

- First budget meeting on proposed budget for FY2022 (July 2021 June 2022).
- Auditor report for FY2020.
- Succession planning update (if needed).

<u>April 2021</u>:

- Second budget meeting on proposed budget for FY2022.
- Status report on Oakridge Air Project.
- Dashboard update.

May 2021:

- Adopt budget for FY2022 (July 2021 June 2022).
- RFP/RFQ for Auditors.

<u>June 2021</u>:

• Succession planning update (if needed).

July 2021:

• Status report on Oakridge Air Project.

August 2021: No meeting.

September 2021:

- Review 2021 Legislative Session and state general fund decisions.
- Discuss local dues request to IGA partners for FY2023.

October 2021:

- Dashboard update and priorities review.
- Status report on Oakridge Air Project.

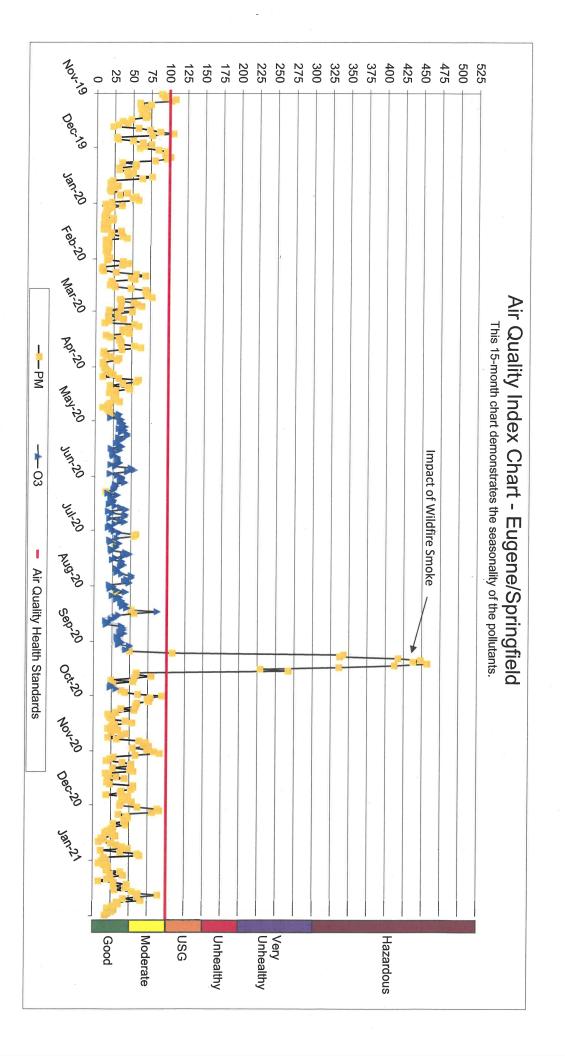
November 2021:

- Auditor report for FY2021.
- Approve local dues request to IGA partners for FY2023.

December 2021: No meeting.

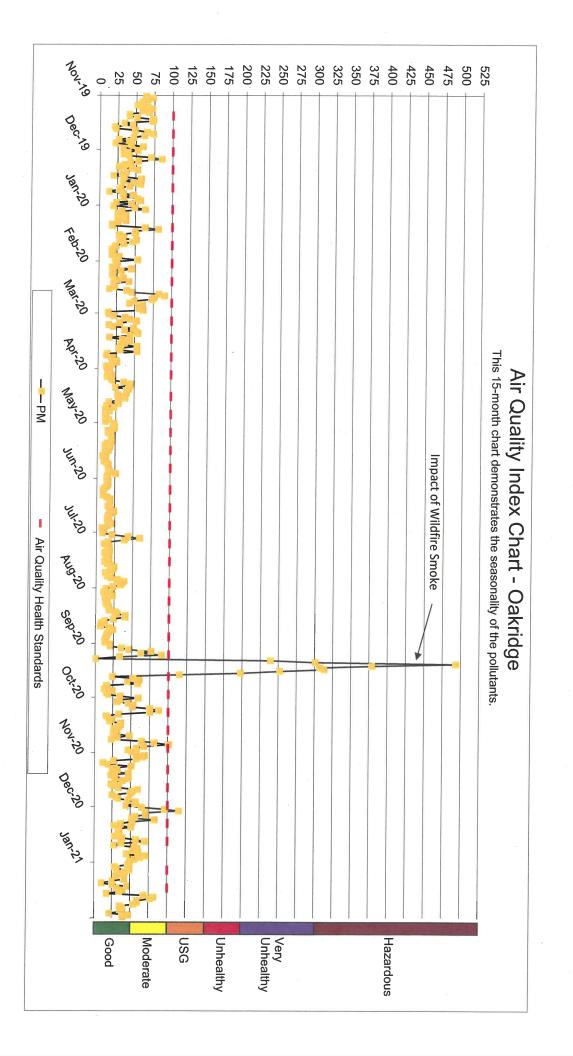
January 2022:

- Preview upcoming appointments on board and committees.
- Status report on Oakridge Air Project.
- Review multi-year budget forecast for FY2022-2026.



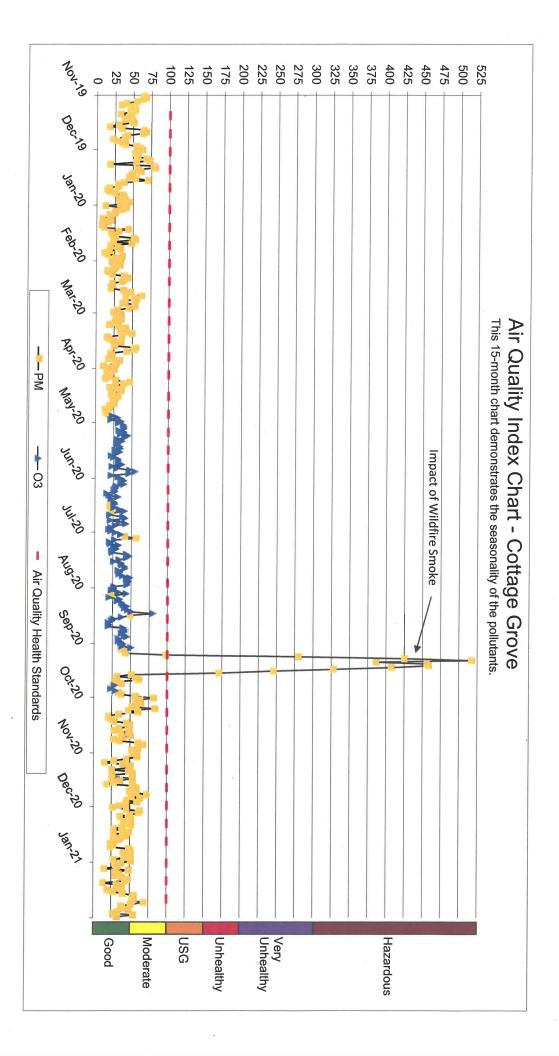
Air Quality Index Chart – Eugene/Springfield For: January 2021

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Air Quality Index Chart – Oakridge For: January 2021

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Air Quality Index Chart – Cottage Grove For: January 2021

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NEW/OPEN ENFORCEMENT ACTIONS STATUS REPORT

01/01/2021 -- 01/31/2021 Report of open and new actions initiated since the last report

NEW: 01/01/2021 -- 01/31/2021

- 1. MOORE, STEPHEN (EUGENE)
 - A. Violation: Failure to promptly extinguish illegal outdoor burning; outdoor burning when prohibited; outdoor burning such as to create a nuisance or hazard to public safety; outdoor burning of prohibited materials; failure to conduct outdoor burning such as to promote efficient combustion.
 - B. Initial Action Taken: NON #3829 issued 01/28/2021
 - C. Subsequent Action: NCP #2020-3829 (\$500) issued 01/28/2021
 - D. Resolution: PENDING

ACTIONS PERFORMED (Enforcement actions issued prior to 01/01/2021 with subsequent action in the current reporting period):

- 1. 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 (\$2382) issued 02/06/2020: request for reduction approved and reduced to \$500 with signed SFO paid
 - D. Resolution: CASE CLOSED on 01/04/2021

2. ALPHA ENVIRONMENTAL SERVICES INC. (EUGENE)

- A. Violation: Conducted asbestos abatement activities inside a negative pressure enclosure on which a viewing window was not installed; failed to adequately clean and remove all asbestos debris at the conclusion of the project; allowed for the open storage or accumulation of friable asbestos containing materials or asbestos containing waste.
- B. Initial Action Taken: NON #3820 issued 11/13/2020
- C. Subsequent Action: NCP #2020-3820 (\$4,400) issued 12/01/2020 paid
- D. Resolution: CASE CLOSED on 01/22/2021
- 3. ATKORE PLASTIC PIPE COMPANY (EUGENE)
 - A. Violation: Failure to operate all air contaminant generating processes and all contaminant control equipment at full efficiency and effectiveness (failed to assure and affirm that baghouse filter cartridges were installed and operating correctly).
 - B. Initial Action Taken: NON #3825 issued 11/30/2020
 - C. Subsequent Action: NCP #2020-3825 (\$2,200) issued 1/14/2021
 - D. Resolution: PENDING
- 4. 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 #2020-3818 (\$700) issued 05/27/2020; request for hearing scheduled and held on 11/13/2020; On 12/15/2020, the Hearing's Officer held up the violations however, adjusted the civil penalty from \$700 to \$600; Respondent has 30 days from 12/29/2020 to request an appeal or pay the \$600 adjusted civil penalty; 01/12/2021 Respondent requested an Appeal to the LRAPA Board; 1/14/2021 Respondent was sent letter with details on

requirements for the Request for Appeal to the Board - Respondent has 30 days from 01/12/2021 to submit Exceptions and Brief

PENDING (Enforcement actions issued prior to 01/01/2021 with no subsequent action in the current reporting period):

- 1. VARGUS, RIGOBERTO (JUNCTION CITY)
 - 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 an Outdoor Burning 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
- 2. 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; no response, default order judgment in process for a lien on the property
 - D. Resolution: PENDING
- 3. 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 in process for a lien on the property
- D. Resolution: PENDING
- 4. 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 in process for a lien on the property
 - D. Resolution: PENDING
- 5. 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 an Outdoor Burning Letter Permit from LRAPA
 - B. Initial Action Taken: NON #3813 issued 02/20/2020
 - C. Subsequent Action: NCP #2020-3813 (\$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 in process for a lien on the property
 - D. Resolution: PENDING

6. 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 #2020-3815 (\$700) issued 05/27/2020; no response, default order judgment in process for a lien on the property
- D. Resolution: PENDING
- 7. DILLION, LEE (EUGENE)
 - 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 (household garbage)
 - B. Initial Action Taken: NON #3821 issued 10/01/2020
 - C. Subsequent Action: NCP #2020-3821 (\$450) issued 10/12/2020; no response, default order judgment in process for a lien on the property
 - D. Resolution: PENDING
- 8. MOON, SHANNON (OAKRIDGE)
 - A. Violation: Outdoor burning when prohibited; outdoor burning such as to cause a public hazard; outdoor burning of construction/demolition debris without first obtaining an Outdoor Burning Letter Permit from LRAPA.
 - B. Initial Action Taken: NON #3822 issued 10/01/2020
 - C. Subsequent Action: NCP #2020-3822 (\$650) issued 10/12/2020; no response, default order judgment in process for a lien on the property
 - D. Resolution: PENDING
- 9. BACHMANN, MICHAEL (COTTAGE GROVE)
 - A. Violation: Failure to attend outdoor burning until extinguished, failure to promptly extinguish illegal outdoor burning; outdoor burning when prohibited; outdoor burning such as to create a nuisance; outdoor burning of prohibited materials (household garbage)
 - B. Initial Action Taken: NON #3823 issued 11/10/2020
 - C. Subsequent Action: NCP #2020-3823 (\$700) issued 11/23/2020; no response, default order judgment in process for a lien on the property

D. Resolution: PENDING

10. LADD, DENNIS (COTTAGE GROVE)

- A. Violation: Failure to attend outdoor burning until extinguished, 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)
- B. Initial Action Taken: NON #3824 issued 11/10/2020
- C. Subsequent Action: NCP #2020-3824 (\$700) issued 11/23/2020; no response, default order judgment in process for a lien on the property
- D. Resolution: PENDING