



Director’s Report for May 2024

Meeting Date: June 13, 2024
Department: Director’s Office
www.lrapa.org

Agenda Item No. 13
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May 2024 AQI CHARTS AND STATS:

Site	Date	Max AQI	Pollutant
Eug/Spfld	11-May-24	46	O3
Oak	9-May-24	27	PM
CottGrv	10-May-24	44	O3

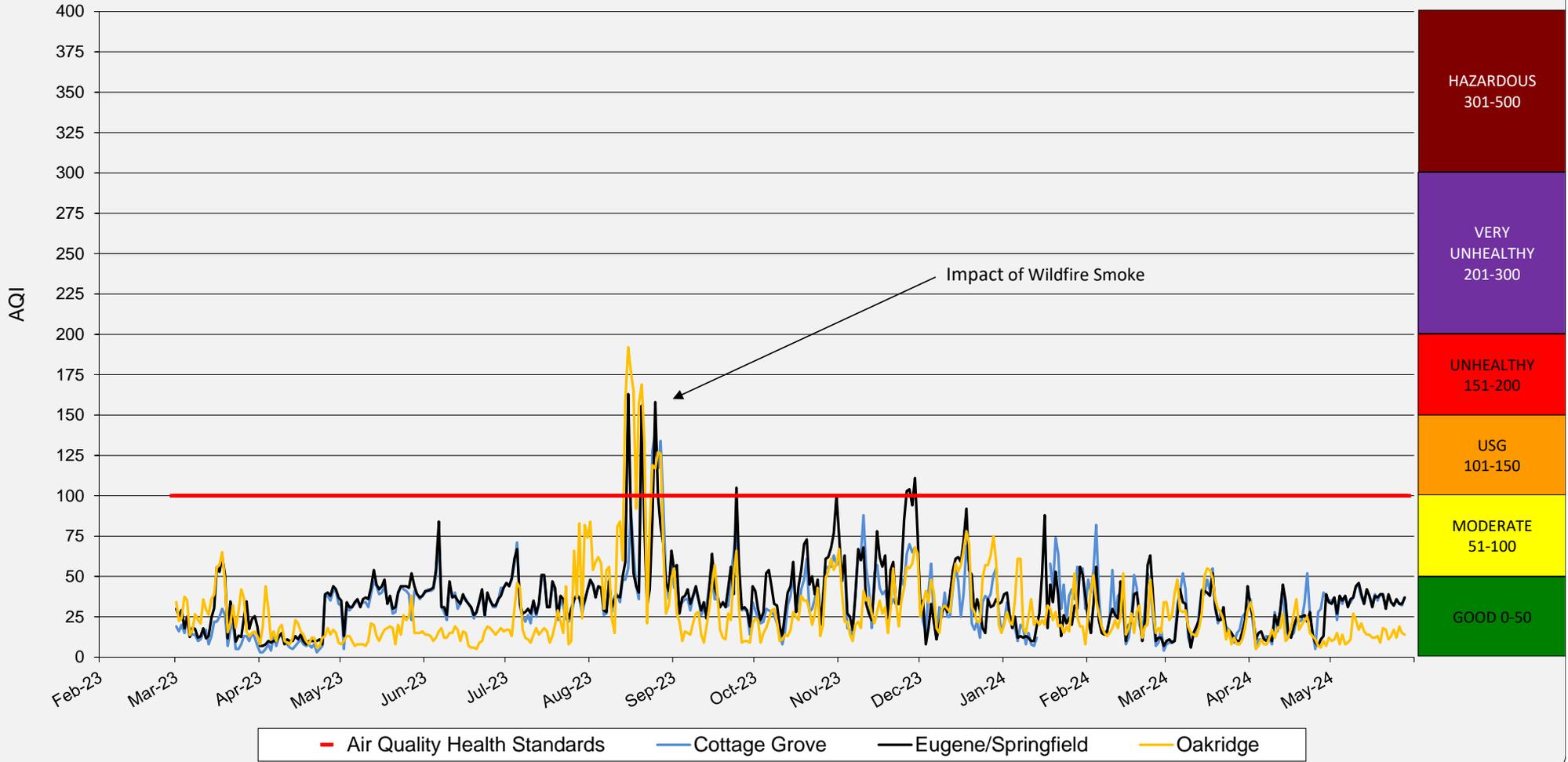
AQI	Eug/Spfld	Oak	CottGrv	AQI Range	PM2.5 Range, ug/m3	Ozone Range, ppb
Good	31	31	31	0-50	0-12	0-54
Moderate	0	0	0	51-100	12.1-35.4	55-70
USG	0	0	0	101-150	35.5-55.4	71-85
Unhealthy	0	0	0	151-200	55.5-150.4	86-105
Very Unhealthy	0	0	0	201-300	150.5-250.4	106-200
Hazardous	0	0	0	301-500	250.5-500	201+

Attachment No. 1: Air Quality Index (AQI) charts for Lane County (May 2024)

Attachment No. 2: PM2.5 index charts for Lane County (May 2024)

Daily Air Quality Index Chart

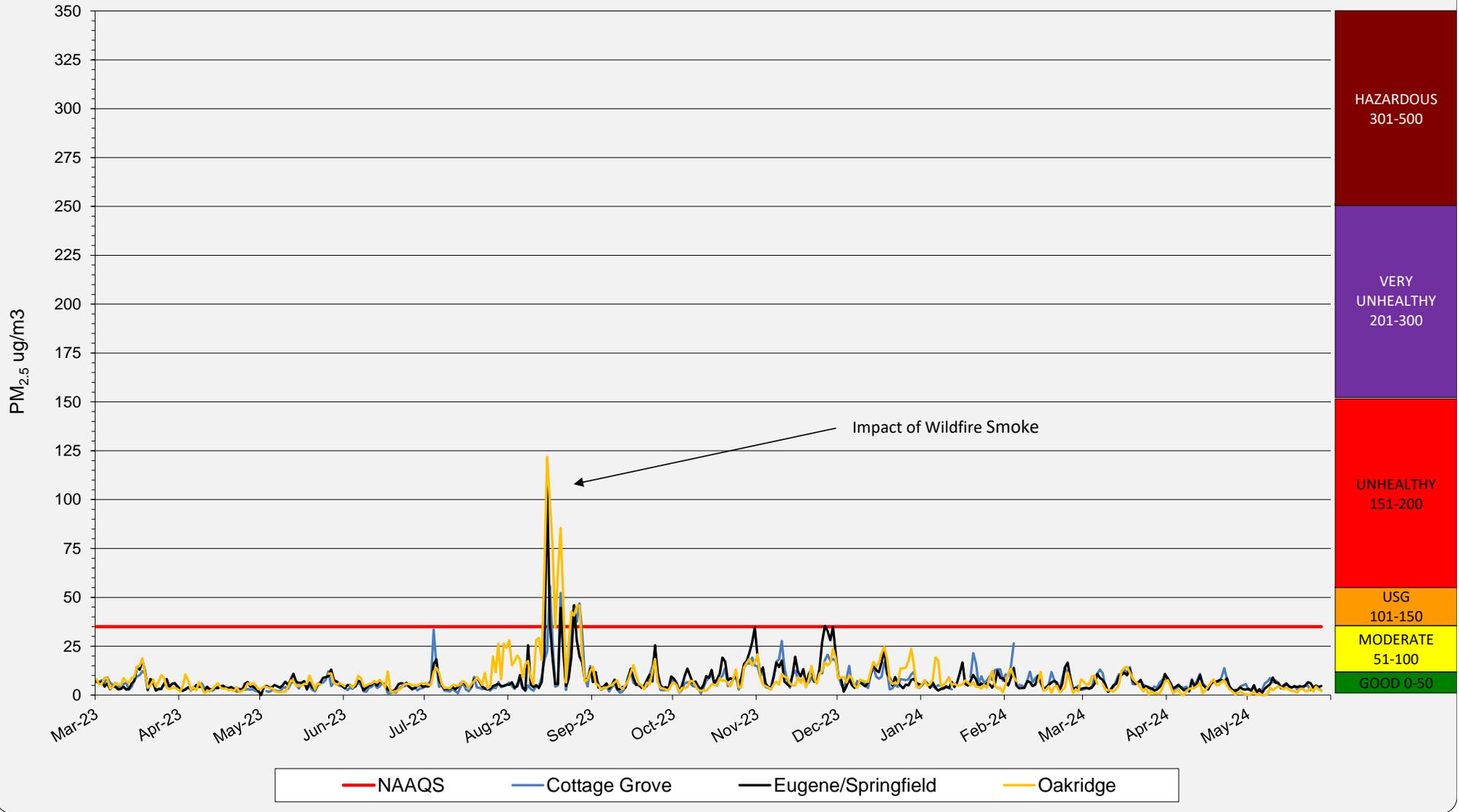
This 15-month chart demonstrates the seasonality of the pollutants.



Daily PM2.5 Levels

Daily Sampling, NAAQS Exceedance is Triggered on the 8th High

AQI LEVEL



COMPLAINTS RECEIVED: 5/1/2024 thru 5/31/2024:

Smoke complaints: 24
21 - Outdoor Burning
2 - Home Wood Heating
1 – Recreational Fire
Industry: 8
1 - Gasoline Dispensing Facility (Eugene Airport)
1 – Newood Manufacturing
3 – International Paper
1 – Emerald Forest Products – Plant #1 (Eugene)
1 – Oregon Rubber Company
1 – Swanson Group Manufacturing
Miscellaneous: 7
1 - Wood Chips
1 - Generator
1 - Pizza Food Cart
3 - Asbestos
1 - Unknown
Total:39

The calendar year 2024 compares to previous years:

Year	2019	2020	2021	2022	2023	*2024
Dust	15	17	26	12	7	2
Ag Burning / Spraying	6	2	7	2	3	0
General Air Quality	12	4	8	1	25	14
Home Wood Heating	128	74	57	67	52	23
Industry	170	100	336	198	97	34
Outdoor Burning	402	423	243	292	254	79
Slash Burning	16	12	10	6	12	0
Miscellaneous	67	59	40	102	72	13
Unknown	39	74	71	45	65	22
Total	855	765	798	725	587	187

* Year-To-Date

NEW/OPEN ENFORCEMENT ACTIONS STATUS REPORT 5/1/2024 to 5/31/2024

NEW: 5/01/2024 -- 5/31/2024: None.

Calendar year 2024 compared to previous years:

Year	2019	2020	2021	2022	2023	*2024
Notices of Non-compliance and Warnings	55	15	21	24	19	3
Notices of Violation with Civil Penalties	37	26	17	24	15	2

* Year-To-Date.

ENFORCEMENT: 5/01/2024 to 5/31/2024

Category of Violation	New	Follow-Up Action	Pending	Closed	Total
Asbestos	-	-	3	-	3
Industrial	1	-	3	-	4
Outdoor Burning	-	-	3	-	3
Fugitive Dust	-	-	-	-	-
Home Wood Heating	-	-	-	-	-
Totals	1	-	9	-	10

NEW/OPEN ENFORCEMENT ACTIONS STATUS DETAIL REPORT

5/1/2024 -- 5/31/2024

Report of open and actions initiated since last report

NEW ENFORCEMENT ACTIONS: 05/01/2024 -- 05/31/2024

1. A & K DEVELOPMENT CO, PACIFIC METAL FAB (JUNCTION CITY)
 - A. Violation: Failed to notify LRAPA prior to the construction of a new stationary source in accordance with LRAPA Rules and Regulations paragraph 34-010(1)(a); operating an air contaminant source which is listed in Section 37-8010 Table 1 without first obtaining and ACDP from LRAPA in accordance with LRAPA 37-0020(3).
 - B. Initial Action Taken: NON #3903 issued 05/30/2024
 - C. Subsequent Action: PENDING
 - D. Resolution: PENDING

PENDING (Enforcement actions issued prior to 05/01/2024 with no subsequent action in the current reporting period):

1. PETROCARD INC (GOSHEN) (GOSHEN)
 - A. Violation: The permittee failed to submit in a timely manner performance testing records to LRAPA which demonstrate compliance with vapor testing requirements outlined in permit conditions 5.1.a and 5.1.b. On 2/25/2022 the permittee was notified by LRAPA that they had exceeded the annual throughput threshold of 480,000 gallons of gasoline in 2019 and were therefore subject to the vapor recovery testing requirements outlined in the permit. On 4/8/2022 LRAPA was advised that vapor recovery testing could not be completed since the lines were manifolded and the issue was escalated to construction to isolate the lines. On 7/7/2022 LRAPA called and emailed the permittee requesting an update. On 8/2/2022 LRAPA called and emailed the permittee requesting an update. Permittee responded advising that they were still working to fix the issue. On 10/5/2022 LRAPA emailed the permittee requesting an update. On 10/26/2022 LRAPA called and emailed the permittee requesting an update.
 - B. Initial Action Taken: NON #3872 issued 11/03/2022
 - C. Subsequent Action: NCP #2022-3872 (\$3000) issued 12/08/2022: submitted the test results over 12-month late, therefore the request for reduction was not approved. No response to payment has been received, a default order judgment is in process for a lien on the property.
 - D. Resolution: PENDING

2. JOHN A. RANKIN AND STEVE FOWLKES (SPRINGFIELD)
 - A. Violation: 43-015(10)- ASBESTOS ABATEMENT NOTIFICATION REQUIREMENTS. Except as provided for in 43-015-8, written notification of any asbestos abatement project must be provided to the Agency on a form prepared by and available from the Agency, accompanied by the appropriate fee; 43-015(11)(C)- Enclose the area of the asbestos-containing materials to be abated, in a negative pressure enclosure prior to abatement unless prior approval has been granted by the agency; 43-015(11)(G)- The asbestos abatement project area shall be adequately cleaned at the conclusion of the project to assure removal of all asbestos debris; 43-015(11)(N)- Open storage or open accumulation of friable asbestos-containing material or asbestos containing waste material is prohibited; 43-015(11)(P)- No person shall conduct an asbestos abatement project unless they possess a current asbestos abatement Contractors license or worker's certification, issued by the Department under OAR 340-248-040 or OAR 340-248-0120 and OAR 340-248-0130, respectively, unless exempted by 43-015-8 and/or 43-015-9; 43-015(11)(S)- A certified supervisor is required to be present on each asbestos abatement project other than a small-scale short-duration activity; 43-015(11)(T)- An owner or operator of a facility shall not allow any persons other than those employees of the facility owner or operator who are appropriately certified or a licensed asbestos abatement contractor to perform an asbestos abatement project in or on that facility unless exempted by 43-015-8 or 43-015-9; 43-015-19(B)- Persons disposing of asbestos-containing waste material must notify the landfill operator of the type and volume of the asbestos-containing waste material; 43-015(19)(B)(1)- All asbestos-containing waste materials must be adequately wetted to ensure that they remain wet until delivered to an authorized landfill, and either: (a) processed into non-friable pellets or other shapes; or (b) packaged in leak-tight containers such as two plastic bags with a minimum thickness of 6 mil., or fiber or metal drum. Containers must be labeled as follows: (i) the name of the asbestos waste generator and the location where the asbestos waste was generated; and (ii) a warning label that states: DANGER Contains Asbestos Fibers Avoid Creating Dust Cancer and Lung Disease Hazard Avoid Breathing Airborne Asbestos Fibers Alternatively, warning labels

specified by 29 CFR 1926.1101(k)(7)(8/19/94) may be used; 43-105(19)(E)- All asbestos-containing waste material must be deposited as soon as possible by the waste generator at: (1) An asbestos-containing waste disposal site authorized by the Department and operated in accordance with the provisions of this rule;

- B. Initial Action Taken: NON #3877 issued 03/06/2023
 - C. Subsequent Action: NCP #2023-3877 (\$10400) issued 03/06/2023: request for reduction approved and reduced to \$5,200 on 04/19/2023 with a payment schedule of \$400 per month and is on schedule with payments
 - D. Resolution: PENDING
3. KYLE MCLENNAN, BRUCE R MCLENNAN (VENETA)
- A. Violation: Failure to obtain an asbestos survey from an accredited asbestos inspector prior to conducting the demolition of a facility; Burning construction/demolition waste without first obtaining an LRAPA letter permit.
 - B. Initial Action Taken: NON #3880 issued 04/11/2023
 - C. Subsequent Action: NCP #2023-3880 (\$3,650) issued 04/11/2023; no response and no payment received; a default order judgment is in process for a lien on the property
 - D. Resolution: PENDING
4. APRO LLC DBA UNITED PACIFIC ROCKET # (SPRINGFIELD)
- A. Violation: The permittee failed to submit performance testing records to LRAPA which demonstrate compliance with triennial vapor testing requirements outlined in permit conditions 5.0. Permittee last submitted testing results relative to conditions 5.1.a and 5.1.b on February 4th, 2020, and therefore is required to have testing conducted by February 4th, 2023. Condition 7.1.c of the permit requires notification of upcoming testing be submitted to LRAPA and condition 7.2 requires test results be submitted to LRAPA no later than 30 after testing has occurred.
 - B. Initial Action Taken: NON #3886 issued 04/25/2023
 - C. Subsequent Action: NCP #2023-3886 (\$2,250) issued 06/12/2023: no response and no payment received; a default order judgment is in process for a lien on the property
 - D. Resolution: PENDING
5. SEALS, MARK (ELMIRA)
- A. Violation: Outdoor burning of prohibited materials (metal, plastic, rubber, etc.).
 - B. Initial Action Taken: NON #3888 issued 06/13/2023
 - C. Subsequent Action: NCP #2023-3888 (\$550) issued 07/31/2023: no response and no payment received; a default order judgment is in process for a lien on the property
 - D. Resolution: PENDING
6. A&A AUTO WRECKERS, INC. (JUNCTION CITY)
- A. Violation: 43-010(1) - No person may openly accumulate friable asbestos-containing material or asbestos-containing waste material; 43-015(7) - Unless exempt pursuant to 43-015-8, prior to commencing the renovation or demolition of a facility, the owner or operator of the facility must obtain a survey from an accredited asbestos inspector of the entire facility, or the part of the facility where the demolition or renovation will occur, for the presence of asbestos-containing materials, including the presence of non-friable asbestos-containing material. A copy of the survey report must be kept onsite at the facility during any demolition or renovation activity; 43-015(11)(P)- No person shall conduct an asbestos abatement project unless they

possess a current asbestos abatement Contractors license or worker's certification, issued by the Department under OAR 340-248-040 or OAR 340-248-0120 and OAR 340-248-0130, respectively, unless exempted by 43-015-8 and/or 43-015-9. 43-015(11)(T) - An owner or operator of a facility shall not allow any persons other than those employees of the facility owner or operator who are appropriately certified or a licensed asbestos abatement contractor to perform an asbestos abatement project in or on that facility unless exempted by 43-015-8 or 43-015-9.

- B. Initial Action Taken: NON #3889 issued 05/03/2023
 - C. Subsequent Action: PENDING
 - D. Resolution: PENDING
7. CARTER, LARRY; VERNON VENSON (SPRINGFIELD)
- A. Violation: Allowing for the open burning of prohibited materials (pressure treated wood, railroad ties, plastics, clothing, drywall, metal, etc.)
 - B. Initial Action Taken: NON #3895 issued 12/14/2023
 - C. Subsequent Action: NCP #2023-3895 (\$550) issued 12/18/2023; no response and no payment received; a default order judgment is in process for a lien on the property
 - D. Resolution: PENDING
8. WOOLMAN, TIM (VENETA)
- A. Violation: Allowing for the burning of prohibited materials (plastics).
 - B. Initial Action Taken: NON #3898 issued 03/01/2024
 - C. Subsequent Action: NCP #2024-3898 (\$850) issued 03/07/2024; no response and no payment received; a default order judgment is in process for a lien on the property
 - D. Resolution: PENDING
9. MARATHON COACH (COBURG)
- A. Violation: Failed to notify and obtain approval from LRAPA prior to construction or modification of a new or existing stationary source in accordance with condition G20 of Respondent's Simple ACDP and LRAPA Rules and Regulation, Title 34-034.
 - B. Initial Action Taken: NON #3899 issued 03/07/2024
 - C. Subsequent Action: NCP #2024-3899 (\$536) issued 03/07/2024: request for reduction under review
 - D. Resolution: PENDING

OUTDOOR BURNING LETTER PERMITS: 5/01/2024 TO 5/31/2024

There was one Outdoor Burning Letter Permit (OBLP) issued in May 2024.

- 1. Issued Special Letter Permit 20B24-05-01 on May 10 to Allen R Ransom, 2700 Munsel Lake Road, Florence, to burn 30 cubic yards of Land Clearing debris located at 87909 Hwy 101, Florence.

ASBESTOS ABATEMENT: 5/01/2024 to 5/31/2024

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 2024 compares to previous years:

Calendar year 2024 compares to previous years:

Year	2019	2020	2021	2022	2023	*2024
Total Asbestos Abatement Notices	488	439	408	465	466	213
School Asbestos Abatement Notices (NESHAP)	16	25	20	16	17	6
Number of Asbestos Abatements Inspected	94	93	104	115	91	22

* Year-To-Date.

PERMITTING (TITLE V AND ACDP):

- Currently 13 sources, Title V permits
- Currently approximately 275 sources, Air Contaminant Discharge Permits (ACDPs)

Permit activities:

Category of Permit Activity	Title V	ACDP	Registration	Total Active
New	2	3		5
Renewals	3	13		16
Modifications		5		5
Constructions	1			1
Registrations				
Terminated Permits		5		
Total Issued Permits Year-to-date	5	27		32

Permits placed on public notice:

Source Name	Reason for Public Notice	Type of Permit
Pacific Recycling, Inc.	Renewal and Modification of ACDP	Renewal and ACDP modification - changing from Basic to Simple ACDP.

Permits with public hearing notice:

Source Name	Reason for Public Hearing	Date of Public Hearing
Seneca Sawmill Company	ACDP Modification and New Title V	May 21, 2024

Permit backlog:

Permit Type	Total Number of Permits by Type	Number of Permits Extended Administratively	Percentage of Total (%)
Title V	13	1	8%
Standard ACDP	27	2	7%
Simple ACDP	28	4	14%
Total	68	5	10%

MEDIA INTEREST, EXTERNAL COORDINATION AND OUTREACH

<i>Date</i>	<i>Media</i>	<i>Person</i>	<i>Topic</i>
2/9/2024	KEZI	Robert Desaulniers	Springfield Burning Variance
2/25/2024	KEZI	Noah Chavez	Springfield Burning Variance
03/28/2024	Ore. News Service	Eric Tegethoff	Air Quality Awareness Week
03/28/2024	KVAL	Juliette Smith	Allergy Season
04/25/2024	KLCC	Tiffany Eckert	ALA Report
04/29/2024	KEZI	Aaron Arellano	ALA Report
05/03/2024	Eugene Emerald	Andres Baisch	ALA Report
06/04/2024	KXCR	Larry Bloomfield	Community Talk Radio

LRAPA performed a number of outreach and public engagement events over May 2024. In early May LRAPA public affairs presented on Air Quality topics for three 5th grade classes at Two Rivers/Dos Rios Elementary School in Springfield. These classes were beginning an atmospheric science curriculum and were interested in understanding how the weather impacts and affects air quality. View the presentations provided to the classes: [2024 Two Rivers, Dos Rios Elementary School 5th Grade Presentation.pptx](#)

LRAPA participated in Air Quality Awareness Week (AQAW) which is an annual social media campaign lead by the Environmental Protection Agency (EPA) dedicated to raising public awareness about the importance of clean air and actions individuals can take to improve air quality and protect their health.

LRAPA formally connected with the event planners for the Pacific Northwest International Section (PNWIS) of the Air & Waste Management Association (A&WMA). The 2024 PNWIS conference will be held at the Graduate Hotel in Eugene in October. LRAPA is utilizing this opportunity to assist in the planning and execution of the annual conference to build rapport and working relationships within the environmental regulatory industry.

On May 21, LRAPA held a public hearing for Sierra Pacific Industries' modified Standard Air Contaminant Discharge Permit (ACDP) for their Seneca Sawmill. The modification, a Type 3 change and Non-PSD/NSR Moderate Technical Permit Modification, addresses the facility's rebuild and relocation. The sawmill applied for a Title V Operating Permit in September 2023, as the 2022 ACDP indicated potential emissions above major source thresholds. The draft Title V Permit includes all requirements from the proposed modified ACDP.

LRAPA staff presented to the Oregon Environmental Quality Commission (EQC) to propose revisions to rulemaking packages approved by the Board in 2024. These changes address updates in DEQ air quality regulations adopted on November 18, 2022, and effective March 1, 2023. As well as LRAPA updates to Title 47 Outdoor Burning Rules to meet changing community needs, aligning definitions with DEQ's Chapter 340, Division 264, and removing the prohibition on outdoor burning in Lowell.

LRAPA presented to the Eugene Rotary Club at the Graduate Hotel in Eugene. The presentation focused on LRAPA's role in monitoring and protecting air quality in Lane County. And discussed current air quality issues, initiatives undertaken by LRAPA, and practical steps individuals can take to improve air quality. The event provided an opportunity for Rotary Club members to learn about local environmental efforts and engage in a Q&A session.

AGENCY GOALS AND UPDATES

In January 2022, the Board established the following goals to drive LRAPA's efforts in protecting public health, community well-being, and the environment. Below is an overview of each goal, accompanied by recent updates and milestones, with specific focus on activities in May 2024.

1. Oakridge/Westfir Air Quality Improvement

Objective: Seek EPA approval to improve air quality in Oakridge/Westfir.

- Following the redesignation of Oakridge in September 2022, LRAPA continues to implement two targeted airshed grants in the area to further improve progress.
- LRAPA engaged with Oakridge Air to benefit from a concluding report from a community survey of Oakridge conducted by the University of Oregon. The survey findings report that many Oakridge residents are concerned about air quality, especially from wildfires and wood stoves, and have experienced health impacts from smoke. While awareness of Oakridge Air programs is mixed, residents expressed interest in receiving more air quality information and resources to increase their preparedness for smoke events.
- LRAPA met with the City of Oakridge, South Willamette Solutions, Brocks Wood Lot LLC, and DEQ to explore environmental regulations and solutions around the City of Oakridge's yard debris recycling program to coordinate ongoing and future support of the program.

2. Internal Efficiency Enhancement

Objective: Streamline internal processes and policies for improved efficiency.

- An internal focus on policies and procedures continues. The current focus is on enhancing internal file organization to improve access and manageability, with a comprehensive review and restructuring of the organizational folder system. This collaborative effort involves all staff and aims to align with everyone's workflows, targeting full completion of the folder's structure by the end of July.
- A new internal agency drive has been created. LRAPA managers are crafting the initial structure of the folders before engaging with staff for review, suggestions, and buy-in.

3. Pre-Budget Planning

Objective: Plan ahead for budget committee meetings to ensure financial stability.

- Despite challenges due to executive and financial management changes, LRAPA remains engaged in the budget cycle. The budget committee approved the proposed FY'25 budget in May, marking good progress towards the planned board adoption in June.

4. Financial Stability Assessment

Objective: Evaluate LRAPA's costs and explore funding sources for long-term stability.

- LRAPA's budget forecast and assumptions indicate the agency's finances are stable.

5. Website Redesign

Objective: Improve LRAPA's website for better user access to air quality information.

- Following the website redesign in September 2022, May improvements include the addition of a connecting button to the US Forest Service's Blue-Sky smoke forecast model. Developed in collaboration with the NW-AIRQUEST program, regional partners, and administered by LRAPA, this modeling tool provides daily predictions on smoke dispersion and air quality impacts.

6. Community Engagement

Objective: Increase interaction with communities to raise air quality awareness.

- LRAPA continues to engage collaboratively with various stakeholders and agencies on soil remediation activities concerning J.H. Baxter in West Eugene. LRAPA participated in a social media campaign for Air Quality Awareness Week the first full week of May.
- LRAPA provided a presentation to 5th grade classes at Two Rivers/Dos Rios Elementary School in Springfield.
- LRAPA began collaborating with the Pacific Northwest International Section of the Air & Waste Management Association to plan the 2024 PNWIS conference at the Graduate Hotel in Eugene this October, enhancing industry relationship.
- On May 21, LRAPA held a hearing for Sierra Pacific Industries' modified ACDP and draft Title V Permit for their Seneca Sawmill, addressing its rebuild, relocation, and potential major source emissions.
- LRAPA presented to the Eugene Rotary Club at the Graduate Hotel.

7. Collaboration and Partnerships

Objective: Strengthen relationships with local communities and industry for problem-solving.

- LRAPA participated in several regional collaborative groups and committee meetings in April. These included Lane Regional Climate Collaborative, Oakridge Area Fire Safe Council, and Lane County Healthy Housing Collaborative.

8. Funding Source Diversification

Objective: Seek new funding opportunities to support air quality programs.

- LRAPA has been informed by DEQ that its prospects for increased budget support are constrained due to a lower prioritization of climate and environment in the governor's

budget. Consequently, LRAPA's ability to secure enhanced funding through DEQ is significantly limited. Moving forward, LRAPA will need to directly engage Oregon legislators to advocate for its funding needs. However, there are restrictions on the extent of this engagement to avoid the need for official registration as lobbying, which may affect the agency's ability to secure new or additional legislative support in the upcoming long session.

9. Airmetrics Enterprise Evaluation

Objective: Assess the effectiveness of Airmetrics in monitoring air quality.

- Following the board's decision in late 2022 and 2023, Airmetrics has closed operations. LRAPA is considering retaining the Airmetrics location for storage during the agency's remodel. LRAPA removed references to Airmetrics from its website in early June 2024.

10. Complaint Intake Process Improvement

Objective: Enhance the process for receiving and responding to air quality complaints.

- LRAPA has revised the internal complaint entry user interface in LINFO to streamline the process for staff to enter complaints and investigation results.

11. Regulatory Engagement

Objective: Stay updated on air quality regulations through engagement with relevant organizations.

- LRAPA staff presented to the Oregon Environmental Quality Commission to propose revisions to 2024 rulemaking packages, addressing updates in DEQ air quality regulations effective March 1, 2023, and revising Title 47 Outdoor Burning Rules to meet community needs, align definitions with DEQ, and remove the prohibition on outdoor burning in Lowell.

12. Succession Planning and Staff Training

Objective: Prepare for staff transitions through succession planning and training.

- LRAPA has advanced recruitment efforts. An offer of employment was made and accepted for an open air quality inspector position. Additionally, a first screening of applicants was completed with interviews in June being scheduled. In early May, the Board appointed a new Executive Director of the agency. In late May, a position was posted for an open Public Affairs & Project Manager position with the first screening of applicants in late June.

TENTATIVE UPCOMING LRAPA BOARD AGENDA ITEMS

This schedule outline is a preview of anticipated upcoming agenda items.

July 2024

- QR 3 & 4 Financial Update
- Audit Report
- Rivers to Ridges Presentation on Prescribed Burning
- Year-End Overview of Pre-Audit Financials

- Building Remodel Bid Selection
- Annual Report Review

August 2024 – No Meeting

September 2024

- Discuss Partner Dues
- Board Goals Work Session

October 2024

- Dashboard Report

November 2024

- Approve Partner dues
- Budget Update

December 2024 – No Meeting

January 2025

- Review upcoming appointments on Board and Committees
- Oakridge Air Status Report

February 2025

- Nominations/Appoint Board Chair and Vice-Chair
- Nominations/Appoint new Budget Committee Members and Budget Officer
- Budget Forecast

March 2025

- First Budget meeting proposed budget FY 25-26

April 2025

- Second Budget meeting proposed budget FY 25-26, approve budget

May 2025

- Public Hearing and adoption of approved budget for FY 25-26