



**LRAPA BOARD OF DIRECTORS
AGENDA ITEM SUMMARY**

Director's Report for April 2020

Meeting Date: May 14, 2020
Department: Director's Office
www.lrapa.org

Agenda Item No. 7
Staff Contact: Merlyn Hough
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AIR QUALITY: 04/01/2020 to 04/30/2020

March

Site	Date	Max AQI	Pollutant
Eug/Spfld	8-Apr-20	59	PM
Oak	9-Apr-20	45	PM
CottGrv	8-Apr-20	46	PM

AQI	Eug/Spfld	Oak	CottGrv	Range
Good	28	30	30	0-50
Moderate	2	0	0	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 (April 2020)

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

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

COMPLAINTS: 04/01/2020 to 04/30/2020 [TOTAL: 114]

- Smoke – 98** total smoke complaints: 86 for outdoor burning; 8 for home-wood heating and 4 for unknown smoke.

2. **Industry** – 4 total complaints: 2 for JH Baxter; 1 for International Paper; and 1 for Seneca Sustainable Energy.
3. **Miscellaneous/Unknown/Dust** – 12 total miscellaneous complaints: 2 for General air quality; 2 for asbestos and 8 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	4
HomeWoodHeating	62	135	95	219	121	342	130	197	126	128	34
Industry	265	169	128	122	127	52	58	74	50	170	38
Outdoor Burning	268	341	268	321	279	251	266	281	351	402	172
Slash Burning	5	16	7	5	7	11	26	13	24	16	1
Miscellaneous	77	101	79	52	57	85	164	138	66	67	16
Unknown	12	25	17	14	35	46	56	63	29	39	32
Total	734	839	645	806	674	839	761	806	678	855	298

* Year-to-date.

ENFORCEMENT: 04/01/2020 to 04/30/2020

Category of Violation	New	Follow-Up Action	Pending	Closed	Total
Asbestos	-	-	1	-	1
Industrial	-	-	13	-	13
Outdoor Burning	-	-	6	-	6
Fugitive Dust	-	-	-	-	-
Home-Wood Heating	-	-	-	-	-
Totals	-	-	20	-	20

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	18

* Year-to-date.

OUTDOOR BURNING LETTER PERMITS: 04/01/2020 to 04/30/2020

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

ASBESTOS ABATEMENT: 04/01/2020 to 04/30/2020

During April, LRAPA received 24 notices of asbestos removal projects, three of which were schools (Lowell School, McClain in Blachly, Applegate in Crow).

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	143
School Asbestos Abatement Notices (NESHAP)	70	61	53	24	21	24	27	28	24	16	5
Number of Asbestos Abatements Inspected	107	106	90	96	67	89	82	120	77	94	35

* Year-to-date.

PERMITTING (TITLE V AND ACDP): 04/01/2020 to 04/30/2020

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	-	2	-	2
Renewals	8	15	-	23
Modifications	1	2	-	3
Constructions	-	1	-	1
Registrations	-	-	-	-
Terminated Permits	-	2	-	2
Issued Permits	8	19	-	27
*Total	17	41	-	58

*** 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 April 18-24, 2020

See: <http://4cleanair.org/sites/default/files/Documents/042420wklyupdate.pdf>

- Opening Briefs Filed in Cases Challenging ACE Rule
- EPA Temporarily Relaxes Continuous Emission Monitoring Quality Assurance Testing Requirements During COVID-19 National Emergency
- In Opening Brief EPA and NHTSA Defend Regulatory Requirements for Heavy-Duty Truck Trailers
- Democratic Lawmakers Pressure EPA About COVID-19 Enforcement Discretion Policy
- Two More Studies Link Exposure to Air Pollution with COVID-19 Deaths
- Court Rules EPA Must Redo Pulp Mill Standards to Include All HAPs
- DOJ Files New Arguments Opposing California-Quebec GHG Trading
- EPA Publishes Technical Corrections to 2012 Light-Duty Vehicle GHG Program
- ALA Releases *State of the Air 2020*

Week of April 11-17, 2020

See: <http://4cleanair.org/sites/default/files/Documents/041720wklyupdate.pdf>

- EPA Issues Final Rule Withdrawing MATS “Appropriate and Necessary” Finding and Setting RTR
- Science Advisory Board Calls for EPA to Redo MATS Risk Assessment, Takes Issue with Exclusion of Co-Benefits

- EPA Administrator Proposes to Retain Current PM NAAQS Without Revision; Senate Democrats Push Back
- Fourteen State AGs Urge EPA to Rescind COVID-19 Enforcement Policy
- Thirteen States, D.C., NYC Sue DOE over Energy Efficiency Rollback
- DOJ Halts Civil Penalty Payments
- EPA's 2018 GHG Inventory Shows Emissions Surge
- EPA Proposes Fuels Streamlining Rule
- New Jersey Files Opening Brief in D.C. Circuit Challenge to EPA's "Reasonable Possibility" NSR Recordkeeping and Reporting Rule
- Federal Court Vacates EPA Directive Barring Current EPA Grant Recipients from Federal Advisory Committees
- Enforcement Study Suggests Broad Noncompliance with Many Environmental Rules
- Massive Global Economic Benefits and Losses Predicted from Climate Action or Inaction
- EPA Publishes Extension of Public Comment Period on Supplemental "Science Transparency" Proposal
- EPA Publishes Final RTR for Hydrochloric Acid Production Facilities
- EPA Publishes MATS Coal Refuse Rule
- Resources for State, Local and Tribal Governments Added to EPA's COVID-19 Website

Week of April 4-10, 2020

See: <http://4cleanair.org/sites/default/files/Documents/041020wklyupdate.pdf>

- Researchers Link Increased Exposure to Particulate Matter to Increased Chance of Death from COVID-19
- D.C. Circuit Reinstates Portion of HFC Replacement Rule
- EPA Sets MATS Subcategory for Existing Power Plants Firing Certain Coal Refuse
- D.C. Circuit Dismisses Sierra Club Challenge to Significant Impact Levels Guidance
- EPA Publishes Proposed Amendments to Phosphoric Acid Air Toxics Regulation
- EPA Proposes Minor Changes to MATS Reporting; Comments Due May 11

Week of March 28 – April 3, 2020

See: <http://4cleanair.org/sites/default/files/Documents/040320wklyupdate.pdf>

- EPA and DOT Take Final Action to Roll Back GHG and Fuel Efficiency Standards for Cars
- Volvo to Enter Voluntary Clean Cars Agreement with California
- House Committee Chairs Seek More Time for Public Participation in Science Transparency Rulemaking; EPA Extends Comment Period by 30 Days
- EPA Inspector General Calls upon EPA to Communicate EtO Risks to Public; Administrator Refutes Alert
- Environmental Groups Petition EPA to Disclose Enforcement Discretion Actions
- EPA Inspector General Finds 'General Decline' in Environmental Enforcement
- EPA Issues Draft Risk Evaluation Finding 'Unreasonable Risks' Related to Asbestos
- COP26 Postponed
- EPA Seeks Nominations, by May 1, for Science Advisory Board and Standing Committees
- Proposed Changes to Standards for Auto Shop Handling of Ozone Depleting Substances Published in *Federal Register*

- EPA Publishes Final Amendments to Wood Heating Device NSPS
- EPA Proposes to Amend Phosphoric Acid Air Toxics Rule
- EPA Makes Technical Corrections to 2012 Light-Duty Vehicle GHG Program
- EPA Develops Grant FAQ Document Related to COVID-19

PUBLIC INFORMATION – Travis Knudsen

On-Going

A new routine and workflow with at-home work due to COVID-19 has slowed productivity. However, as time moves forward and the routine becomes more engrained, productivity improves. Challenges still exist around connecting with staff and partners through electronic means, where physical interaction would be more efficient. I believe I'm committing 8-hours of work each day, though dispersed beyond a standard 8am to 5pm window.

As the Public Relations Manager, my own familiarity with all LRAPA's projects and partnerships is growing and I become more confident in which tasks require immediate attention, and which can be attended to later.

Big projects for the month of May include working with the UO on a community meeting – likely electronic – discussing Purple Air Sensors and the community's immediate involvement. The Oakridge Air (Tag) website will launch in the month of May. Significant progress is expected to be made on LRAPA's annual report, as well as beginning a report to the EPA of the LRAPA Woodsmoke Reduction project agreement due in June.

I am also on an email thread with NACAA Public Outreach to compile online materials suitable for public education of air topic during the closure of physical schools. The goal is to compile a list of resources on our website to point parents to for homeschooling assignments and opportunities.

Asbestos

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

Media Contacts

4/6	KLCC – LRAPA Outdoor Burn Ban
4/6	Eug. Weekly – COVID-19 impact on Air Quality
4/13	KVAL – COVID-19 impact on Air Quality
4/27	SWHNA – COVID-19 impact on Air Quality

Meetings/Events

4/6	TAG Call with EPA/GC/LRAPA
4/7	Outdoor Burn Ban Meeting w/ Chad Minter
4/9	Budget Committee & Board of Directors Meeting
4/13	Longview, WA Industrial Fire Smoke impacting W. Valley

4/14	Government Issues Committee meeting
4/14	NACAA call on COVID-19 Impacts on State/Local Air Agencies
4/14	NACAA Public Outreach Committee Conference Call
4/14	TAG Call with Fairbanks Alaska
4/15	Oakridge Air - Health Data Analysis call
4/16	Request for Proposal Meeting – LRAPA Director
4/17	Environmental Justice Pathways Webinar
4/20	TAG Call with EPA/GC/LRAPA
4/21	NACAA Agriculture Com. & NACAA Criteria Pollutants Com.
4/22	Springfield Rotary Club
4/23	NASEO-NACAA VW Working Group call
4/23	AWMA Outreach
4/24	ECRCO meeting with EPA
4/24	Oakridge Air Communications Workgroup
4/27	LRAPA-UO PPPM Air Quality Projects
4/28	Citizens Advisory Committee Meeting
4/28	Government Issues Committee – “Reopening Oregon”
4/30	P2C - Home Show Meeting

Press Releases

4/4	Outdoor burning banned in Lane County to temper respiratory complications related to COVID-19
4/9	LRAPA Board of Directors soften countywide ban on outdoor burning

General Programs and Projects

- Edit Director RFP Scoring Sheet (TK) *Completed*
- Review Director RFPs (TK) *Completed*
- Install Purple Air Sensor at 526 N. Danebo (TK) *Completed*
- Compile and review EPA 105 Grant (TK) *Completed*
- Host P2C Home Show meeting (TK) *Completed*
- ECRCO resolution agreement is accepted by EPA (TK) *Completed*
- Establish Best Practices for Zoom Meetings (TK) *Completed*
- Host Zoom Teleconference for CAC meeting (TK) *Completed*
- Community meeting with UO for Purple Air (TK) *In progress*
- Draft COOP (Merlyn, Nasser, Lance, John, TK) *In progress*
- TAG Grant Progress (Merlyn, Nasser, Lance, TK) *In progress*
- EPA Woodsmoke Reduction Project Agreement (TK) *In progress*
- At home clean air educations for LRAPA.org (TK) *In progress*
- 2019 Annual Report (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.

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.
- Dashboard 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.
- Dashboard update.

November 2020:

- Succession planning update.

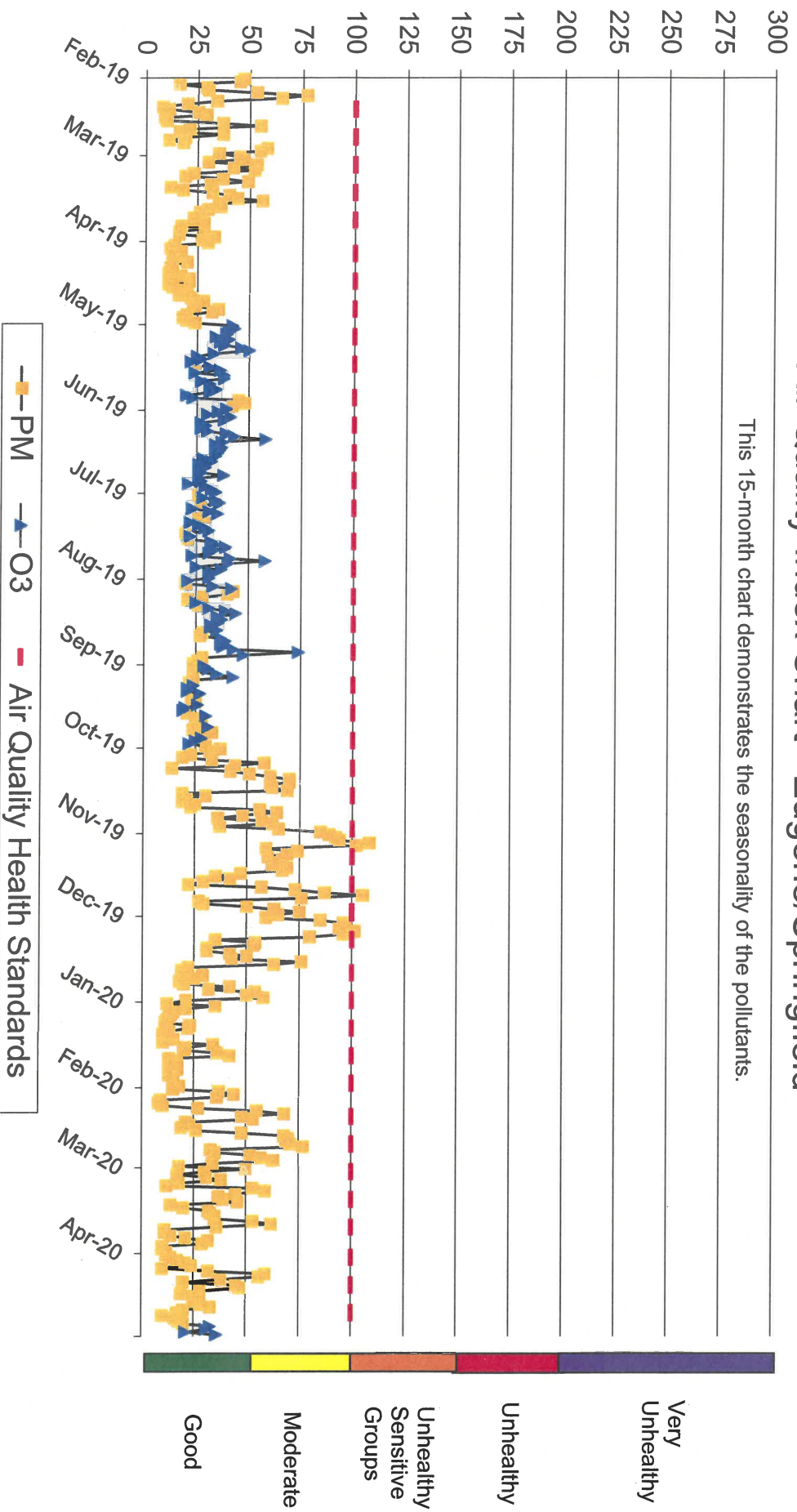
December 2020: No meeting.

January 2021:

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

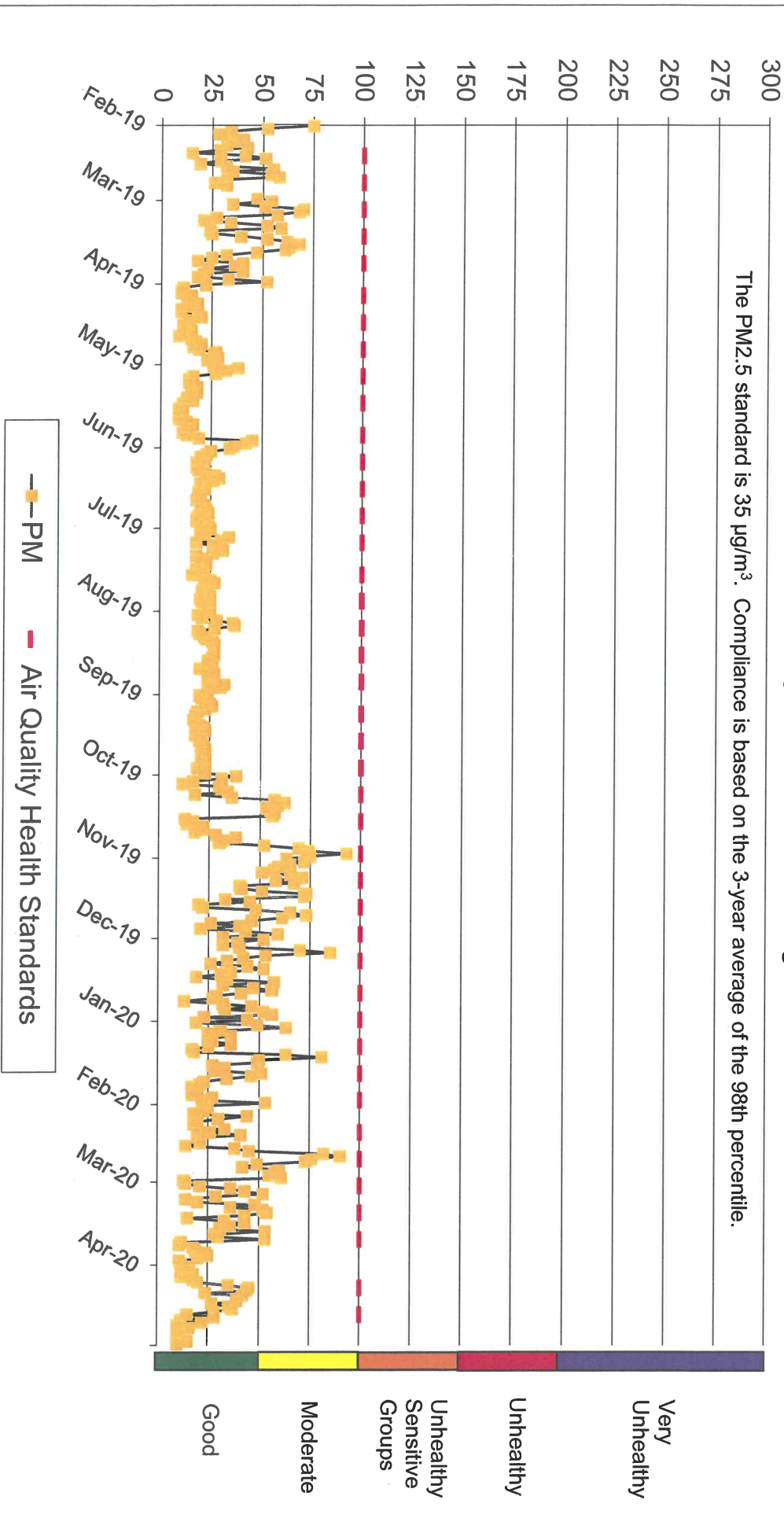
Air Quality Index Chart - Eugene/Springfield

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



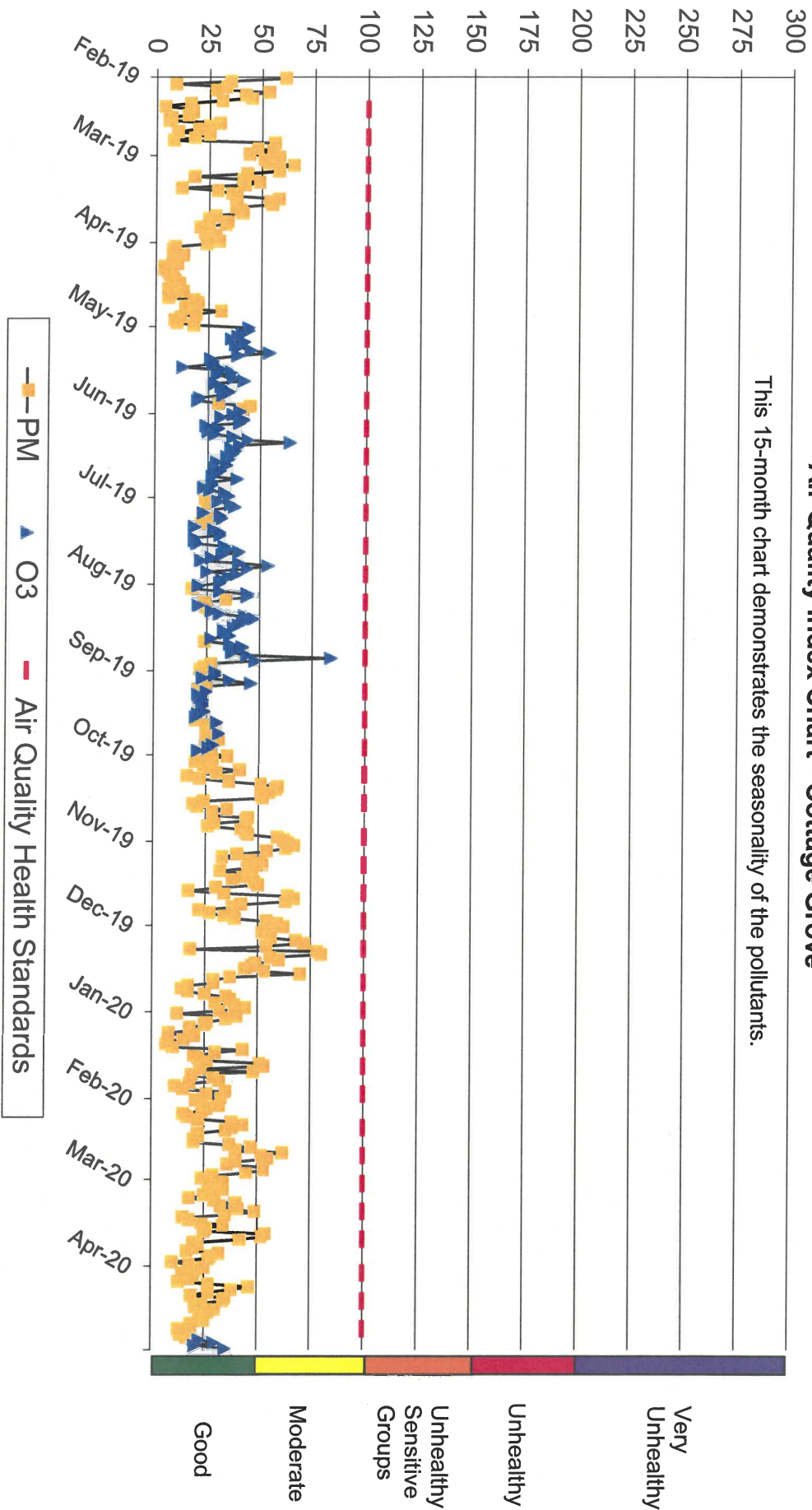
Air Quality Index Chart - Oakridge

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

04/01/2020 -- 04/30/2020

Report of open and actions initiated since last report

NEW (New Enforcement action in the current reporting period): None

PENDING (Enforcement actions issued prior to 04/01/2020 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 – 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 – 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. 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 – 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 – 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 – 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
 - C. 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 01/23/2020; submitted test results on 03/04/2020; 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; no response, Default Order Judgment (DOJ) for a lien on the property in process

- 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, proposed settlement under negotiation
 - 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 #2020-3813 (\$2,025) issued 03/17/2020
 - 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 #2020-3814 (\$600) issued 03/17/2020
 - D. Resolution: PENDING