



**LRAPA BOARD OF DIRECTORS
AGENDA ITEM SUMMARY**

Director's Report for May 2020

Meeting Date: June 11, 2020
Department: Director's Office
www.lrapa.org

Agenda Item No. 6
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AIR QUALITY: 05/01/2020 to 05/31/2020

March

Site	Date	Max AQI	Pollutant
Eug/Spfld	28-May-20	54	PM
Oak	29-May-20	25	PM
CottGrv	28-May-20	54	PM

AQI	Eug/Spfld	Oak	CottGrv	Range
Good	30	31	30	0-50
Moderate	1	0	1	51-100
USG	0	0	0	101-150
Unhealthy	0	0	0	151-200
Very Unhealthy	0	0	0	201-300

Attachment No. 1: Air quality index charts for Eugene/Springfield (May 2020)

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

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

COMPLAINTS: 05/01/2020 to 05/31/2020 [TOTAL: 70]

- Smoke** – 51 total smoke complaints: 44 for outdoor burning; 2 for homewood heating; 2 for agricultural burning; 1 residential BBQ smoke, 1 commercial BBQ smoke and 1 for unknown smoke.

2. **Industry** – 5 total complaints: 3 for JH Baxter; 1 for International Paper; and 1 for Willamette Valley Sandblasting.
3. **Miscellaneous/Unknown/Dust** – 14 total miscellaneous complaints: 2 for asbestos and 12 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	2
General Air Quality	2	6	6	26	30	15	20	14	6	12	4
Home Wood Heating	62	135	95	219	121	342	130	197	126	128	36
Industry	265	169	128	122	127	52	58	74	50	170	43
Outdoor Burning	268	341	268	321	279	251	266	281	351	402	216
Slash Burning	5	16	7	5	7	11	26	13	24	16	1
Miscellaneous	77	101	79	52	57	85	164	138	66	67	20
Unknown	12	25	17	14	35	46	56	63	29	39	45
Total	734	839	645	806	674	839	761	806	678	855	368

* Year-to-date.

ENFORCEMENT: 05/01/2020 to 05/31/2020

Category of Violation	New	Follow-Up Action	Pending	Closed	Total
Asbestos	-	1	-	-	1
Industrial	-	1	11	1	13
Outdoor Burning	3	1	4	1	9
Fugitive Dust	-	-	-	-	-
Home Wood Heating	-	-	-	-	-
Totals	3	3	15	2	23

Attachment No. 4: Enforcement activities during these reporting periods for case details.

For perspective, here is how the total number of enforcement actions for calendar year 2020 compares to previous years:

Year	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	*2020
Notices of Non-compliance and Warnings	57	64	41	51	36	38	41	39	47	55	10
Notices of Violation with Civil Penalties	39	42	29	23	28	37	37	28	43	37	21

*** Year-to-date.**

OUTDOOR BURNING LETTER PERMITS: 05/01/2020 to 05/31/2020

There was one Outdoor Burning Letter Permit (OBLP) issued in May for land-clearing debris.

1. Issued Outdoor Burning Letter Permit 20B20-05-01 on May 15 to Greg Welton, 89399 View Drive, Florence, to burn 10 cubic yards of land-clearing debris located at 88060 Hwy 101, Florence.

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

During May, LRAPA received 32 notices of asbestos removal projects, two of which were schools (Colin Kelly Middle School and Fern Ridge Middle 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	175
School Asbestos Abatement Notices (NESHAP)	70	61	53	24	21	24	27	28	24	16	7
Number of Asbestos Abatements Inspected	107	106	90	96	67	89	82	120	77	94	35

*** Year-to-date.**

PERMITTING (TITLE V AND ACDP): 05/01/2020 to 05/31/2020

LRAPA currently permits 16 Title V sources and approximately 300 Air Contaminant Discharge Permits (ACDPs). Below are the total numbers of permit activities that are new, renewals, modifications, construction approvals, registration application's, terminated and/or issued permits the operations staff currently have in process.

Category of Permit	Title V	ACDP	Registration	Total Active
New	-	2	-	2
Renewals	8	16	-	24
Modifications	-	4	-	4
Constructions	-	-	-	-
Registrations	-	-	-	-
Terminated Permits	-	3	-	3
Issued Permits	12	22	-	34
*Total	20	47	-	67

*** 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 May 23-29, 2020

See: <http://4cleanair.org/sites/default/files/Documents/052920wklyupdate.pdf>

- States, Cities, Counties Challenge EPA's and NHTSA's Final "SAFE" Rule Rolling Back Vehicle GHG and CAFE Standards; Public Health and Environmental Groups Also Sue and Automakers Move to Intervene
- EPA Schedules June 8 Virtual Public Hearing on Residential Wood Heater Sell-Through Proposal; Register by June 4
- EPA Publishes MATS Rule Rescinding "Appropriate and Necessary" Finding; Petition for Review Filed in D.C. Circuit
- States File Petition for Review of COVID-19 Enforcement Discretion Policy in D.C. Circuit
- Ninth Circuit: Climate Nuisance Suits Belong in State Court
- U.S. District Court Remands "Climate Fraud" Lawsuit Against ExxonMobil to Massachusetts State Court
- Report Finds Clean Power Plan's 2030 Emissions Goals Were Met in 2019
- COP 26 Rescheduled

Week of May 16-22, 2020

See: <http://4cleanair.org/sites/default/files/Documents/052220wklyupdate.pdf>

- President Orders Broader Deregulatory Action
- EPA Proposes Additional Time for Retailers to Sell Step 1 Residential Wood Heaters to “Recover Sales That Have Been Lost Due to Coronavirus Health Crisis”; Comments Due July 6
- EPA Proposes Rule on “Guidance Document Transparency”
- EPA Inspector General Finds “Further Efforts Needed” to Uphold Agency’s Scientific Integrity Policy
- Wheeler Receives Praise, Criticism During Appearance Before Senate Environment and Public Works Committee
- Respondent Intervenors Submit Opening Briefs Supporting EPA and NHTSA’s Defense of Regulatory Requirements for Heavy-Duty Truck Trailers
- D.C. Circuit Largely Upholds EPA’s Denial of Maryland and Delaware Petitions Seeking Controls on Upwind Emissions
- Carper Releases Report on How Recent EPA Actions Could Add to COVID Risks
- States Request Extension of Comment Period for PM NAAQS Proposal
- Final Ozone Policy Assessment Announced in *Federal Register*
- Senator Carper Expands Request Urging EPA IG to Investigate Whether EPA Political Officials Circumvented Rulemaking Requirements for “SAFE” Vehicles Rule
- EPA Seeks Nominations for 2020 Clean Air Excellence Awards; Entries Due by July 31, 2020

Week of May 9-15, 2020

See: <http://4cleanair.org/sites/default/files/Documents/051520wklyupdate.pdf>

- NACAA Comments on EPA’s Draft “Begin Actual Construction” Guidance for NSR Permitting
- EPA to Propose Additional Time for Sale of Step 1 Residential Wood Heaters
- Senator Carper Questions EPA Administrator About Forthcoming Proposal to Amend Residential Wood Heater NSPS
- House Science Committee Staff Prepares Memo Highlighting Implementation Plans and Gaps Related to Supplemental Proposed Science Transparency Rule
- States Sue EPA over COVID-19 Enforcement Discretion Policy
- States, DC, NYC Challenge Refrigerant Repair Rollback in Court
- EPA Proposes Adjustments to Tier 3 Vehicle Test Procedures to Smooth Transition to New Test Fuel; Includes Alternative That Would Increase CO₂ Emissions
- EPA Publishes Proposed Fuels Streamlining Rule
- EPA Proposes Technical Amendments to Heavy-Duty Engine and Vehicle Test Procedures
- EPA Forms Multi-Disciplinary Research Team to Focus on PFAS
- Researchers Estimate Air Pollution-Related Premature Deaths Decreased by 360 After One Month of COVID-19 Social Distancing

Week of May 2-8, 2020

See: <http://4cleanair.org/sites/default/files/Documents/050820wklyupdate.pdf>

- Study Finds that Clean Air Act Saves Hundreds of Thousands of U.S. Lives, Trillions of Dollars
- EPA Issues Final RTR for Integrated Iron and Steel Manufacturing Facilities
- EPA Opens Registration for May 20-21 Virtual Public Hearing on PM NAAQS Proposal

- EPA Designates New Federal Equivalent Method for NO₂ Monitoring
- Air Enforcement Chief Exiting EPA

Week of April 25 - May 1, 2020

See: <http://4cleanair.org/sites/default/files/Documents/050120wklyupdate.pdf>

- EPA Publishes PM NAAQS Proposal in *Federal Register*; Public Hearing Teleconference May 20-21, Comments Due June 29
- EPA Science Advisory Board Weighs in on "Science Transparency" Proposal and Supplement
- EPA Releases Complete 2017 National Emissions Inventory
- Final "SAFE" Vehicles Rule Published in *Federal Register*
- First Challenge to "SAFE" Vehicles Rule Filed in D.C. Circuit, Alleges Rule Is Too Stringent and Unsafe
- EPA Releases Complete 2017 National Emissions Inventory
- House, Senate Efforts Highlight Links Between Environmental Justice and Pandemic
- Senator Warns EPA Against Making COVID-19 Enforcement Discretion Permanent
- California Proposes to Amend ZEV Requirements of State's Proposed Advanced Clean Trucks Rule
- EPA Announces Availability of EJ Grants to Assist Communities Facing COVID-19

PUBLIC INFORMATION – Travis Knudsen

On-Going

Much of May has focus on completing final tasks associated with LRAPA's ECRCO complaint, preparing for LRAPA's Purple Air Sensor community meeting on June 4th at 6:00pm, preparing LRAPA's PM₁₀ Grant Memo 2019-2020 for ODEQ due in June, as well as continuing efforts on the Oakridge Air (TAG) program.

The upcoming meeting has a few challenges associated with it. Specifically, the online nature of the meeting has not been attempted before by LRAPA and the technology required to participate in the meeting will likely limit public attendance. To increase awareness LRAPA has posted multiple fliers and memos on Lane County based Facebook Groups. LRAPA has also contacted the Neighborhood Leaders Council of Eugene to pass along meeting details to the 23 neighborhood associations across Eugene. Due to our interest in the Bethel neighborhood to find residents willing to install a purple air sensor on their property, LRAPA communicated our meeting details to the Active Bethel Citizens neighborhood association where our notice was posted to their NextDoor social media profile.

Air Quality Awareness Week was the first week of May. This year LRAPA's social media campaign was designed to remain sensitive to the coronavirus pandemic. All our posts provided Air Quality related educational materials to parents to use as tools to engage their children at home. Items like activity pages, or experiments were posted to our Facebook page and onto Twitter. Facebook posts over the week reached a total 2,833 people with 75 engagements.

LRAPA recorded a radio Public Service Announcement with KXCR 90.7FM to remind drivers not to top off at the gas pump as Oregonians were able to pump their own gas due to COVID-19 precautions.

LRAPA sent out a notification to all ACDP holders of an opportunity to join LRAPA's citizens advisory committee (CAC). Three applications were submitted and are under review by the CAC. LRAPA Public Affairs Staff attended a two-day webinar for the NACAA 2020 Spring Meeting, held virtually in lieu of an in-person conference due to COVID-19 precautions.

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

5/1	KXCR 90.7FM – No Top off at the Gas Pump
5/28	KVAL – Cottage Grove Tree Limb Program

Meetings/Events

5/1	TAG Call with EPA/GC/LRAPA
5/4	SWFC Community Smoke Response Plan
5/5	Government Issues Committee meeting
5/8	PurpleAir Student Capstone Project Meeting
5/11	EPA/LRAPA/ODEQ Check In
5/11	Good Company/LRAPA Oakridge Air Meeting
5/12	Government Issues Committee meeting
5/12	Wildfire Smoke Challenge: Creating Cleaner Air Spaces
5/12	NACAA Public Outreach Committee Conference Call
5/13	EPA/GC/LRAPA TAG Questions & Clarification meeting
5/13	Springfield Rotary Meeting
5/14	Board of Directors Meeting
5/15	Government Issues Committee meeting
5/18	NACAA 2020 Virtual Spring Meeting
5/19	NACAA 2020 Virtual Spring Meeting
5/19	Government Issues Committee meeting
5/19	Oakridge Smoke Response Plan workgroup
5/20	Wildland Fire Community Engagement & Data Visualization
5/21	Purple Air Community Meeting Planning with Ben Clark
5/26	CAC Meeting
5/26	#SmokeReady2020, Pre-Smoke Ready Week Call
5/27	Neighborhood Leaders Council of Eugene Meeting
5/28	NASEO-NACAA VW Working Group
5/29	Lane Regional Resiliency - UO Capstone Presentation
5/29	Oakridge Air, Pre-Proposal conference call

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

- P2C Home Show Summer Event planning (TK) *In progress*
- PurpleAir Community Meeting (TK) *In progress*
- ECRCO Review of Staff Training Doc by EPA (TK) *In progress*
- Host Zoom Teleconference for CAC meeting (TK) *Completed*
- Dashboard report for Board of Directors (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*
- Create LRAPA YouTube Page (TK) *In progress*
- Create LRAPA NextDoor Social Media Profile (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.

May 2020:

- ~~Adopt budget for FY2021 (July 2020 – June 2021).~~
- ~~RFP/RFQ for Auditors.~~
- ~~Succession planning update.~~

June 2020:

- Succession planning update.
- Dashboard update.
- Budget updates.

July 2020:

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

August 2020: No meeting.

September 2020:

- Succession planning update.
- Budget updates.

October 2020:

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

November 2020:

- Succession planning update.
- Budget updates.

December 2020: No meeting.

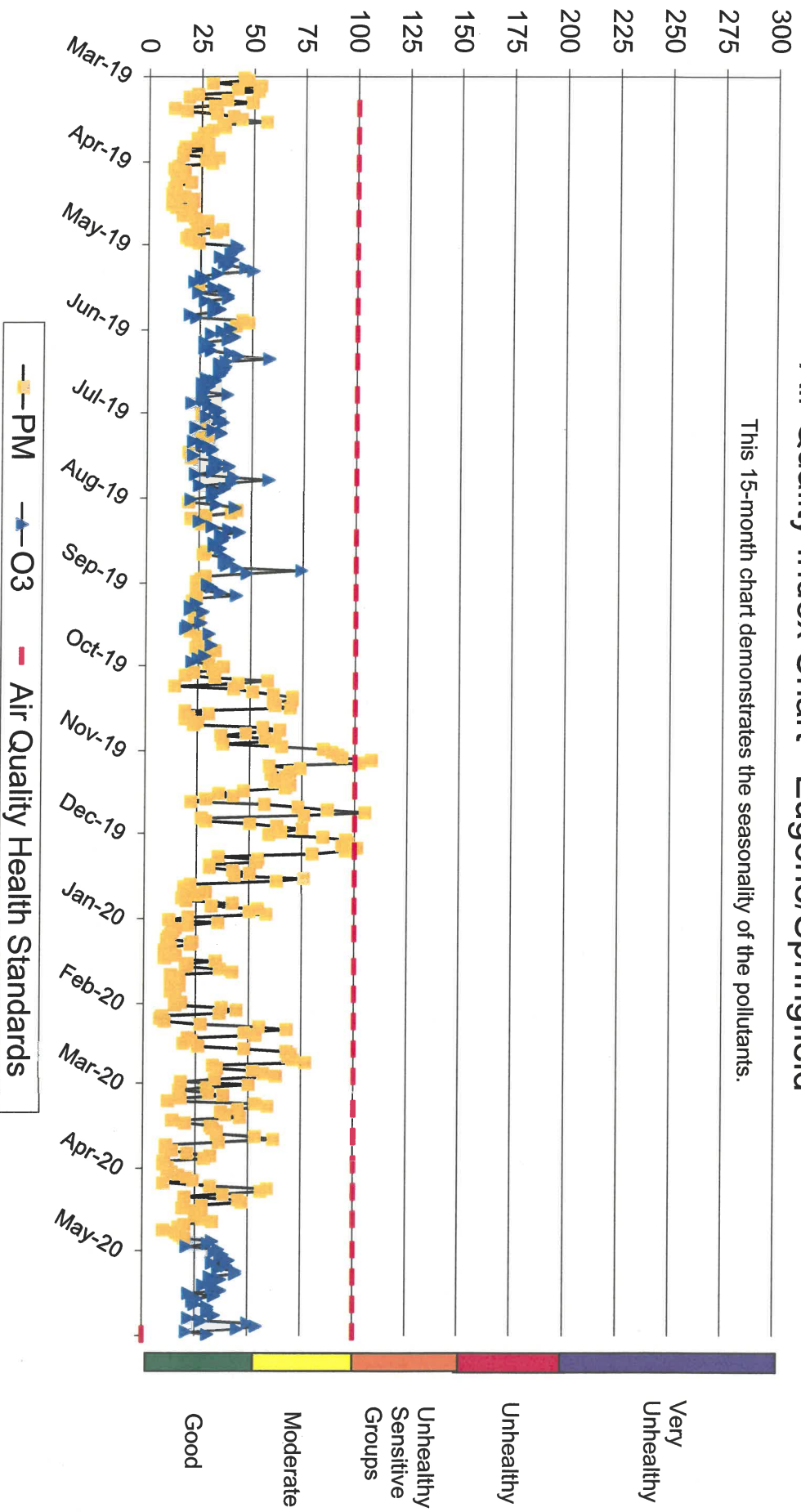
January 2021:

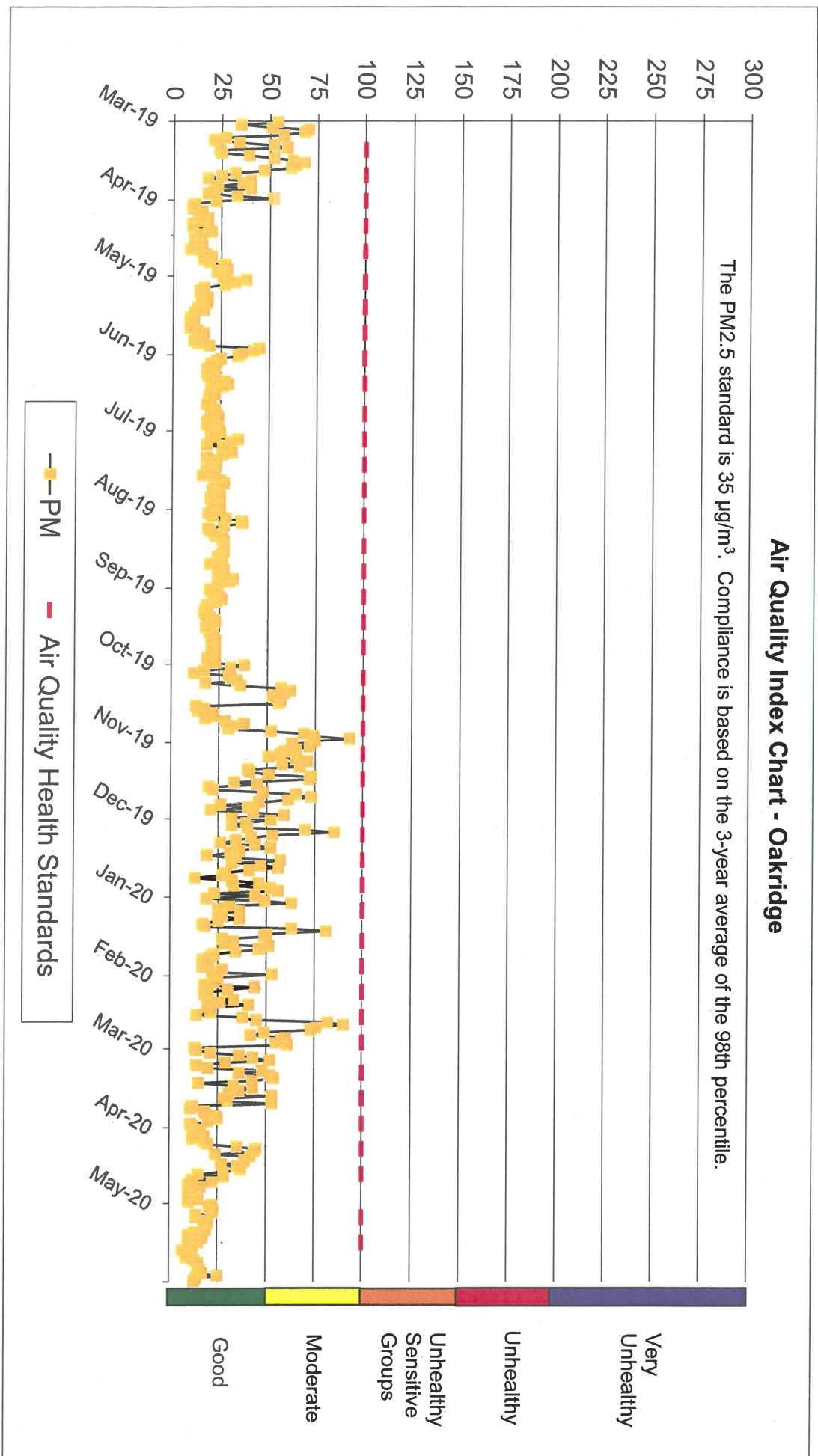
- Review multi-year budget forecast.
- Preview upcoming appointments on board and committees.
- Status report on Oakridge Woodsmoke Mitigation Project.
- Budget updates.

MLH/cmw

Air Quality Index Chart - Eugene/Springfield

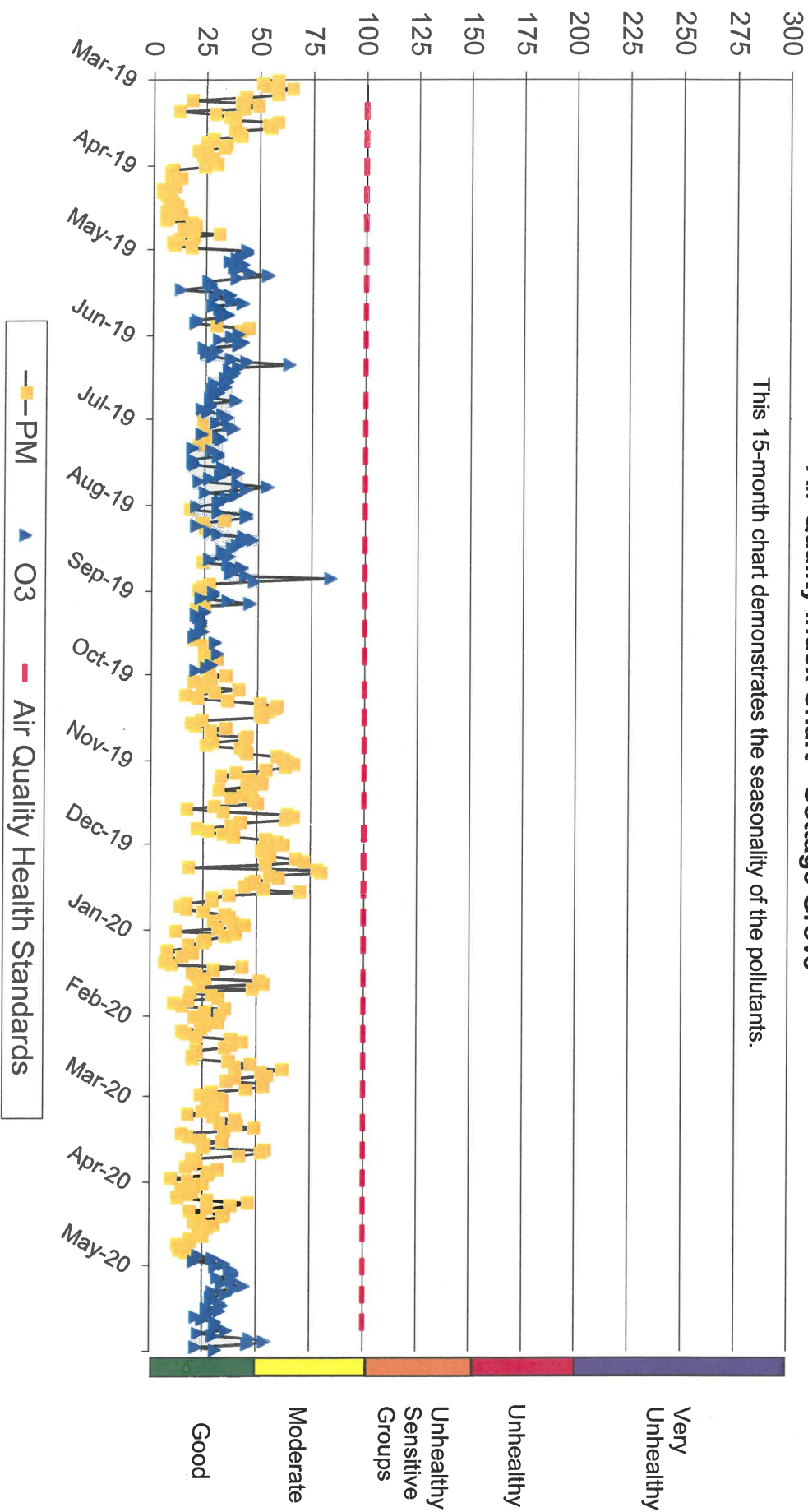
This 15-month chart demonstrates the seasonality of the pollutants.





Air Quality Index Chart - Cottage Grove

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



NEW/OPEN ENFORCEMENT ACTIONS STATUS REPORT

05/01/20 -- 05/31/20

Report of open and actions initiated since last report

NEW: 05/01/20 -- 05/31/20

1. 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 05/08/20
 - C. Subsequent Action: NCP #20-3815 (\$700) issued 05/27/20
 - D. Resolution: PENDING

2. 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 05/15/20
 - C. Subsequent Action: NCP #20-3818 (\$700) issued 05/27/20
 - D. Resolution: PENDING

3. STANDFORD-CLARK, DIANE (COTTAGE GROVE)
 - A. Violation: outdoor burning of prohibited materials; outdoor burning of construction/demolition waste without first obtaining a letter permit from LRAPA.
 - B. Initial Action Taken: NON #3819 issued 05/15/20
 - C. Subsequent Action: NCP #20-3818 (\$1,000) issued 05/27/20
 - D. Resolution: PENDING

ACTIONS PERFORMED (Enforcement actions issued prior to 05/01/20 with current action in reporting period):

1. 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: NONE – Conducted Stack Test on 01/23/20; submitted test results on 03/04/20; report results passed
 - D. Resolution: CASE CLOSED on 05/27/20

2. 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 01/14/20: request for reduction under review; meeting with JHB on March 5, 2020; JHB to submit actions supporting request for reduction approved and reduced to \$4,000 with signed SFO mailed 5/29/20
 - D. Resolution: PENDING

3. 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 01/28/20

- C. Subsequent Action: NCP #20-3812 (\$4,400) issued 02/26/20; request for hearing postponed for negotiations of settlement in the form of revised NCP 20-3812 to \$2,200 issued 05/29/20
 - D. Resolution: PENDING
4. 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 02/20/20
 - C. Subsequent Action: NCP #20-3813 (\$2,025) issued 03/17/20: request for hearing - TBA; Settlement proposal offer 5/29/20 for \$875 mailed 05/29/20
 - D. Resolution: PENDING
5. 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 02/20/20
 - C. Subsequent Action: NCP #20-3814 (\$600) issued 03/17/20: request for reduction approved and reduced to \$300 with signed SFO - paid
 - D. Resolution: CASE CLOSED 05/26/20

PENDING (Enforcement actions issued prior to 05/01/20 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 02/06/20: Submitted TP 201.3 done on 2/4/20 and PV Vent Valve Data Sheet on 2/7/20; reports 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 02/06/20: Submitted TP 201.3 done on 2/4/20 and PV Vent Valve Data Sheet on 2/7/20; reports 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 02/06/20: submitted test notification 2/7/20 scheduled for 2/13/20; reports 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 02/06/20: Received Vapor Testing Report 2/7/20; reports 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 02/06/20; 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 02/06/20: Submitted 2018 test on 2/7/20; reports 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 02/06/20; under review
 - 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 02/06/20; under review
 - 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 02/06/20; under review
 - 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 02/06/20; under review
 - D. Resolution: PENDING
11. 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

Subsequent Action: SFO (\$500) issued 02/03/20: \$100 per month beginning 3/15/20; approved payment adjusted due to CoViD-19; second payment due 6/15/20

D. Resolution: PENDING

12. WOLF, STEVEN A (EUGENE)

A. Violation: Outdoor burning when prohibited; outdoor burning of prohibited materials; outdoor burning within Eugene city limits

B. Initial Action Taken: NON #3807 issued 01/13/2019

C. Subsequent Action: NCP #20-3807 (\$350) issued 01/30/20; no response, Default Order Judgment (DOJ) for a lien on the property in process

D. Resolution: PENDING

13. 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 02/01/20

C. Subsequent Action: NCP #20-3808 (\$600) issued 02/14/20; no response, Default Order Judgment (DOJ) for a lien on the property in process

D. Resolution: PENDING

14. 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 02/03/20
 - C. Subsequent Action: PENDING
 - D. Resolution: PENDING
15. 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 02/10/20
 - C. Subsequent Action: NCP #20-3811 (\$650) issued 02/14/20; no response, Default Order Judgment (DOJ) for a lien on the property in process
 - D. Resolution: PENDING