



Director’s Report for July and August 2024

Meeting Date: September 12, 2024
Department: Director’s Office
www.lrapa.org

Agenda Item No.12
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July and August 2024 AQI CHARTS AND STATS:

Site	Date	Max AQI	Pollutant
Eug/Spfld	30-Aug-24	74	O3
Oak	29-Aug-24	119	PM
CottGrv	1-Aug-24	93	PM

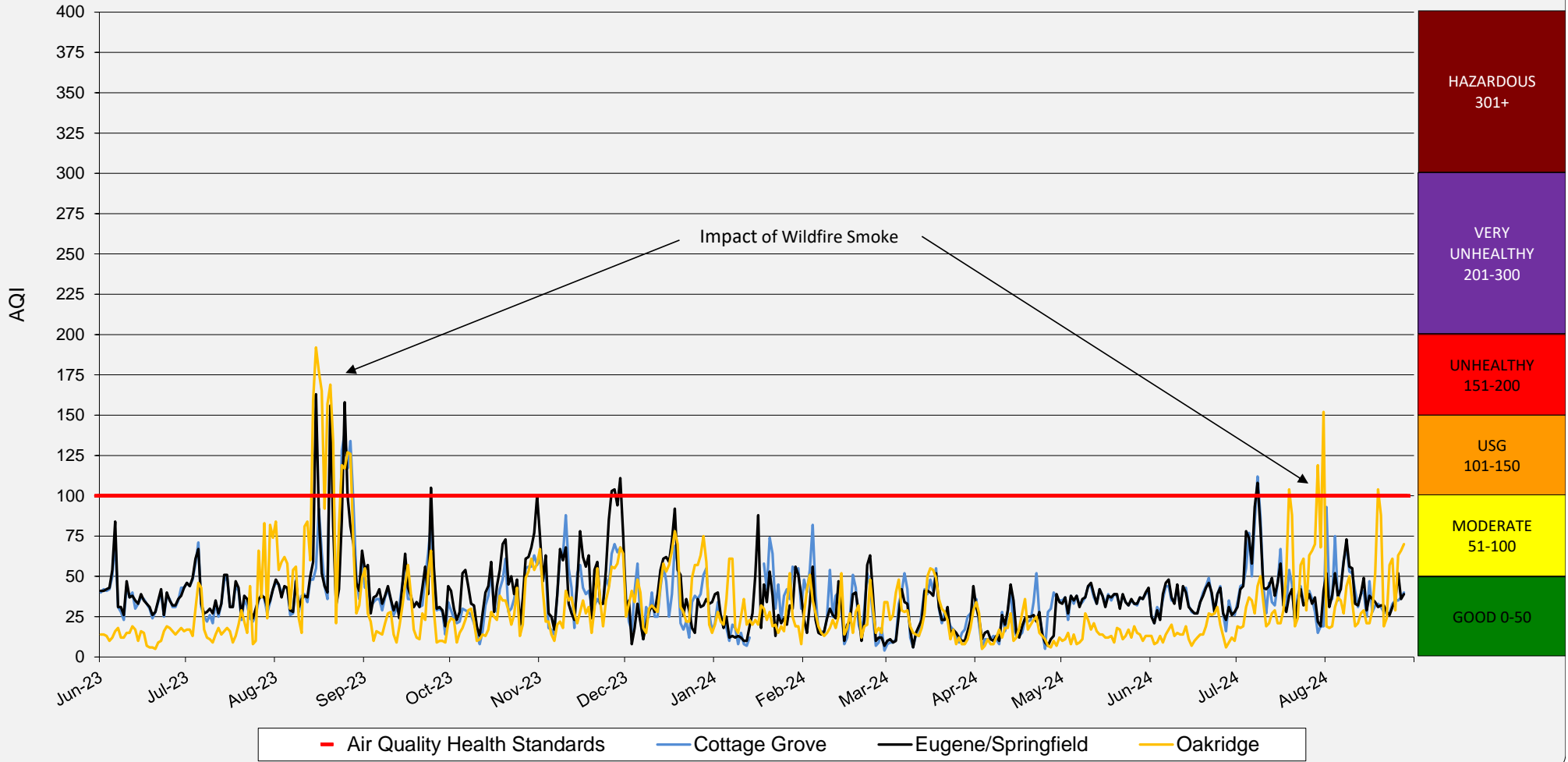
AQI	Eug/Spfld	Oak	CottGrv	AQI Range	PM2.5 Range, ug/m3	Ozone Range, ppb
Good	22	20	23	0-50	0-9	0-54
Moderate	9	9	8	51-100	9.1-35.4	55-70
USG	0	2	0	101-150	35.5-55.4	71-85
Unhealthy	0	0	0	151-200	55.5-125.4	86-105
Very Unhealthy	0	0	0	201-300	125.5-225.4	106-200
Hazardous	0	0	0	301+	225.5+	201+

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

Attachment No. 2: PM2.5 index charts for Lane County (July/August 2024)

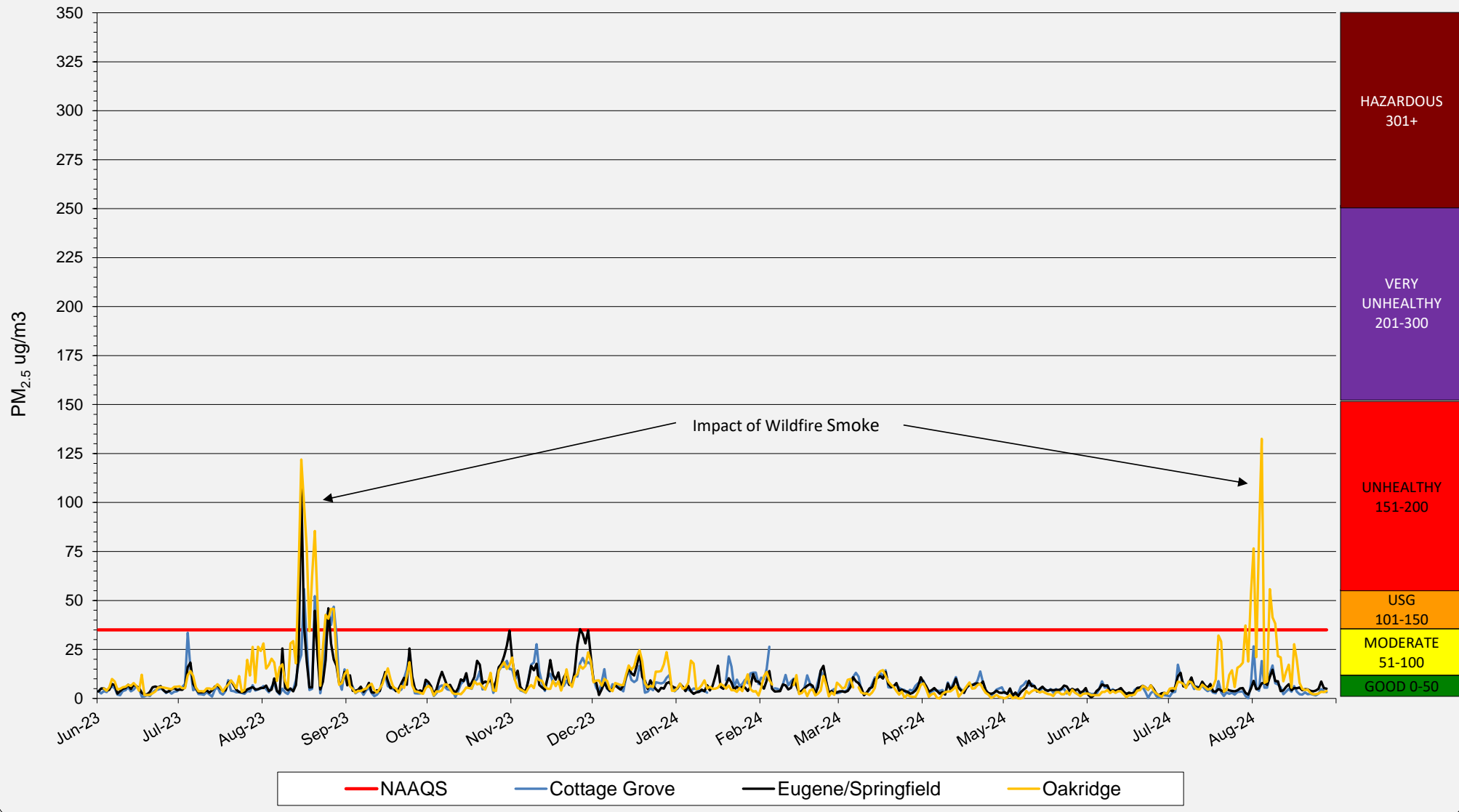
Daily Air Quality Index Chart

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



Daily PM2.5 Levels

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



COMPLAINTS RECEIVED: 7/1/2024 thru 8/31/2024:

Smoke complaints: 28
23 - Outdoor Burning
3 - Recreational Fire
1 – Home Wood Heating
1 – Wildfire Smoke
Industry: 8
3 - Rosboro
4 - International Paper
1 – Stella Jones Corporation
Miscellaneous: 32
6 - Asbestos
5 – Fugitive Dust
1 – Meat Odor
3 – Burning Rubber Odor
17 - Unknown
Total: 68

The calendar year 2024 compares to previous years:

Year	2019	2020	2021	2022	2023	*2024
Dust	15	17	26	12	7	7
Ag Burning / Spraying	6	2	7	2	3	3
General Air Quality	12	4	8	1	25	20
Home Wood Heating	128	74	57	67	52	24
Industry	170	100	336	198	97	45
Outdoor Burning	402	423	243	292	254	160
Slash Burning	16	12	10	6	12	0
Miscellaneous	67	59	40	102	72	57
Unknown	39	74	71	45	65	53
Total	855	765	798	725	587	369

* Year-To-Date

NEW/OPEN ENFORCEMENT ACTIONS STATUS REPORT 7/1/2024 to 8/31/2024

NEW: 7/01/2024 -- 8/31/2024:

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	6
Notices of Violation with Civil Penalties	37	26	17	24	15	2

* Year-To-Date.

ENFORCEMENT: 7/01/2024 -- 8/31/2024:

Category of Violation	New	Follow-Up Action	Pending	Closed	Total
Asbestos	-	-	3	-	3
Industrial	1	-	4	-	5
Outdoor Burning	-	-	3	-	3
Fugitive Dust	-	-	-	-	-
Home Wood Heating	-	-	-	-	-
Totals	1	-	10	-	11

NEW/OPEN ENFORCEMENT ACTIONS STATUS DETAIL REPORT 7/01/2024 -- 8/31/2024:

Report of open and actions initiated since last report

NEW ENFORCEMENT ACTIONS: 7/01/2024 -- 8/31/2024:

1. EMERALD PEOPLE'S UTILITY DISTRICT (EPUD)
 - A. Submitted a 12-month rolling Plant Site Emission Limit (PSEL) calculation spreadsheet as part of their 2023 Annual Report which demonstrated that the facility emitted PM2.5, CO, and NOx in excess of the permitted emission limits during the 12-month periods ending in September 2023, October 2023, November 2023, and December 2023. Per an LRAPA request, Respondent submitted an additional 12-month rolling PSEL calculation spreadsheet showing PSEL exceedances for PM 2.5 in April 2024, CO in January 2024 through April 2024 and NOx in January 2024, March 2024 and April 2024.
 - B. Initial Action Taken: NON #3904 issued 6/6/2024
 - C. Subsequent Action: PENDING – waiting for LRAPA review of reports.

D. Resolution: PENDING

PENDING ENFORCEMENT ACTIONS: 7/01/2024 -- 8/31/2024:

1. A & K DEVELOPMENT CO, PAC 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 Section 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 – documents to be submitted by 9/20/2024.
 - D. Resolution: PENDING

2. 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. The 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

3. 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

4. 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

5. 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

6. 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
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- 7. 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
 - 8. 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
 - 9. 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
 - 10. 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: 7/01/2024 -- 8/31/2024:

There were no Outdoor Burning Letter Permits (OBLPs) issued in July of 2024.

1. Issued Special Letter Permit 20B24-07-01 on August 1 to Rivers to Ridges, Bryce Izlar, Springfield, to burn 100 cubic yards of miscellaneous debris located at various location around Lane County.

ASBESTOS ABATEMENT: 7/01/2024 -- 8/31/2024:

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	315
School Asbestos Abatement Notices (NESHAP)	16	25	20	16	17	18
Number of Asbestos Abatements Inspected	94	93	104	115	91	59

* Year-To-Date.

PERMITTING (TITLE V AND ACDP):

- Currently 14 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	1	4		5
Renewals	3	14		17
Modifications		4		4
Constructions	1			1
General TV	1			1
Registrations				
Terminated Permits		6		6
Total Issued Permits Year-to-date	7	32		39

Permits placed on public notice:

Source Name	Reason for Public Notice	Type of Permit
PeaceHealth Sacred Heart Medical Center at Riverbend	Renewal of ACDP	Standard ACDP. Off public notice 9/6/2024
Carry-On Trailer Corporation	Renewal of ACDP	Simple ACDP. Off public notice 9/9/2024

Glacier Northwest, Inc.	Renewal of ACDP	Simple ACDP. Off public notice 9/6/2024
Horizon Prestain, Inc.	Renewal of ACDP	Simple ACDP. Off public notice 9/9/2024
Northern Gold Foods (USA), LLC	Renewal of ACDP	Simple ACDP. Off public notice 8/13/2024

Permit backlog:

Permit Type	Total Number of Permits by Type	Number of Permits Extended Administratively	Percentage of Total (%)
Title V	14	2	14%
Standard ACDP	26	5	19%
Simple ACDP	27	6	22%
Total	69	13	19%

MEDIA INTEREST, EXTERNAL COORDINATION AND OUTREACH

Date	Media	Person	Topic
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
07/30/2024	KEPW	John Quetzalcoatl Murray	Short Mountain and EPUD PSEL exceedance
8/12/2024	KMTR	Gold Meadows	J.H. Baxter cleanup and LRAPA role in process.

On July 16, 2024 LRAPA provided a presentation to the Lane County Board of Commissioners on LRAPA's role and service provided to Lane County, as well as to formally deliver the enforcement dollars collected by LRAPA in the recent fiscal year to the Lane County general fund, as required by ORS § 468.135.

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 is preparing for the awarding and implementation of the EJG2G grant expanding the Oakridge Air program to include wildfire mitigation efforts. It's anticipated the final terms and conditions with the EPA will be signed by the end of September 2024.
 - o LRAPA has been increasing engagement with Lane County Public Health their work under EJG2G to Conduct health and morbidity assessment in Eastern Lane County using HCUP, APAC, ESSENSE, and/or MMIS data to analyze healthcare utilization patterns and prevalence of smoke-related illnesses.
 - o LRAPA has also increased engagement with OHA on their efforts under the grant to provide public health interpretation of air toxics data collected during the 2022 Cedar Creek Fire and produce a report on health risks and outcomes related to wildfire smoke exposure.

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, a full completion of the folder's structure was set at the end of July.
- Progress on this effort has been slowed due to the logistical needs and efforts in moving LRAPA's office to the Lane County Public Service Building. With the hiring of an Administrative Manager, efforts to make rapid progress on this task is anticipated.

3. Pre-Budget Planning

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

- Despite challenges due to executive and financial management changes, the Board adopted the approved FY'25 budget in June completing the budget process.
- LRAPA is the process of preparing for an Audit of FY'24.

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.

- The website continues to be updated to accurately reflect current operations at the Organization, such as updates to the staff directory to reflect new hires.

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 is 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 relationships.

- LRAPA hired a new Public Affairs and Project Manager, Matt Sorensen, replacing the vacancy which has been open since March of 2024. Matt was the former Executive Director of the Boys & Girls Clubs of Emerald Valley.

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. LRAPA has diligently researched and applied for relevant grants to supplement our funding. Despite our efforts, we have not yet qualified for additional grant funding. We continue to monitor grant opportunities and refine our approach based on feedback received.

9. Airmetrics Enterprise Evaluation

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

- Following the board's decision in late 2023, Airmetrics has ceased all operations. LRAPA provided a 30-day notice to terminate the lease on the Airmetrics warehouse space, which concludes on July 24, 2024. LRAPA has fully vacated the space and removed all 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 engaged with the Board to discuss the annual fee increases for Air Contaminant Discharge Permit (ACDP) and Asbestos Notification fees. The Board was provided with detailed information on the fee structure, the essential work supported by these fees, and considerations for potential adjustments.
 - o Outcomes from this discussion is a planning effort to inform the regulatory community of yearly Board discussion in the Spring, providing opportunity to attend and provide comment to the Board.

- LRAPA successfully implemented the annual 4% fee increases for ACDP and Asbestos Notification fees, as well as a 3% increase for Cleaner Air Oregon (CAO) fees, effective July 1, 2024, ensuring the agency's ability to continue its critical air quality work and adapt to emerging challenges.

12. Succession Planning and Staff Training

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

- LRAPA continues to advance recruitment efforts to address staffing changes:
- An Administrative Manager position was posted in late August, first round of applications will be reviewed at the end of September.
- LRAPA hired a new Public Affairs and Project Manager, Matt Sorensen, replacing the vacancy which has been open since March of 2024. Matt was the former Executive Director of the Boys & Girls Clubs of Emerald Valley.
- An inspector position was opened in early August. Interviews have occurred and a candidate had been selected.

TENTATIVE UPCOMING LRAPA BOARD AGENDA ITEMS

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

October 2024

- Dashboard Report
- Audit Report

November 2024

- Discuss FY 26 Partner dues
- Budget Update

December 2024 – No Meeting

January 2025

- Approve FY 26 Partner Dues
- Review upcoming appointments on Board and Committees
- Oakridge Air Status Report
- Handbook Update

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
- Board Review of annual fee increases set by rule

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