



Director's Report for September 2023

Meeting Date: **October 17, 2023**
 Department: Director's Office
www.lrapa.org

Agenda Item No. 9
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 541-736-1056 ext. 209

September 2023 AQI Charts and Stats: 09/01/2023 – 09/30/2023

Site	Date	Max AQI	Pollutant
Eug/Spfld	24-Sep-23	105	PM
Oak	24-Sep-23	66	PM
CottGrv	24-Sep-23	83	PM

AQI	Eug/Spfld	Oak	CottGrv	AQI Range	PM2.5 Range, ug/m3
Good	24	26	27	0-50	0-12
Moderate	5	4	3	51-100	12.1-35.4
USG	1	0	0	101-150	35.5-55.4
Unhealthy	0	0	0	151-200	55.5-150.4
Very Unhealthy	0	0	0	201-300	150.5-250.4
Hazardous	0	0	0	301-500	250.5-500

Attachment No. 1: Air Quality Index (AQI) charts for Lane County (September 2023)

Attachment No. 2: PM2.5 index charts for Lane County (September 2023)

COMPLAINTS: 09/01/2023 to 09/30/2023 [TOTAL 37]

Smoke complaints: 20

- 15 – Outdoor burning
- 4 – Home wood hearing
- 1 – Slash Burning Smoke

Industry: 5

- 3 – International Paper (2 confirmed, 1 under investigation)
- 1 – Rosboro Springfield
- 1 – Andreason Cremation and Burial

Fugitive Dust: 1

- 1 – Fugitive dust

Miscellaneous complaints: 11

- 4 – Unknown odor
- 1 – Asbestos
- 1 – BBQ Smoker
- 1 – Willamette Family odor
- 1 – Brooks Auto Painting
- 1 – Paint Fumes from Neighbors
- 1 – Motorcycle exhaust fumes
- 1 – A&M Body Shop paint/solvent odor

Year	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	*2023
Dust	30	14	25	32	25	26	15	17	26	12	7
Ag Burning / Spraying	17	4	12	9	1	0	6	2	7	2	3
General Air Quality	26	30	15	20	14	6	12	4	8	1	12
Home Wood Heating	219	121	342	130	197	126	128	74	57	67	36
Industry	122	127	52	58	74	50	170	100	336	198	69
Outdoor Burning	321	279	251	266	281	351	402	423	243	292	189
Slash Burning	5	7	11	26	13	24	16	12	10	6	10
Miscellaneous	52	57	85	164	138	66	67	59	40	102	46
Unknown	14	35	46	56	63	29	39	74	71	45	47
Total	806	674	839	761	806	678	855	765	798	725	419

* Year-To-Date

ENFORCEMENT: 09/01/2023 to 09/30/2023

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

NEW/OPEN ENFORCEMENT ACTIONS STATUS REPORT

9/1/2023 -- 9/30/2023

Report of open and actions initiated since last report

NEW: 9/1/2023 -- 9/30/2023 (No new enforcement actions issued in September 2023)

PENDING (Enforcement actions issued prior to 9/1/2023 with no subsequent action in the current reporting period):

1. **ANDREASON'S CREMATION & BURIAL SVCR (SPRINGFIELD) 320 NORTH 6TH STREET**
 - A. Violation: Respondent exceeded 10% opacity limit for a period or periods aggregating more than 3 minutes in any one hour required by condition 2.1 of the ACDP No. 200539.
 - B. Initial Action Taken: NON #3892 issued 08/08/2023
 - C. Subsequent Action: Submitted training documents and corrective measure documents
 - D. Resolution: PENDING

2. **SEALS, MARK (ELMIRA) 23029 GREEN CREEK ROAD**
 - A. Violation: Outdoor burning of prohibited materials (metal, plastic, rubber, etc.).
 - B. Initial Action Taken: NON #3888 issued 07/31/2023
 - C. Subsequent Action: NCP #2023-3888 (\$550) issued 7/31/2023
 - D. Resolution: PENDING

3. **A&A AUTO WRECKERS, INC. (JUNCTION CITY) 91993 GREEN HILL ROAD**
 - 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 5/3/2023
- C. Subsequent Action: Hired an asbestos abatement contractor to clean up the property
- D. Resolution: PENDING

4. **PETROCARD INC (GOSHEN) 85947 FRANKLIN BVLD**

- 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 11/3/2022
- C. Subsequent Action: NCP #2022-3872 (\$3,000) issued 12/8/2022: submitted test report late, request for reduction not approved due to late source testing and submitting of source test report
- D. Resolution: PENDING

5. **JOHN A. RANKIN AND STEVE FOWLKES (SPRINGFIELD) 2035/2041 MAIN STREET**

- 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 3/6/2023

C. Subsequent Action: NCP #2023-3877 (\$10,400) issued 3/6/2023: request for reduction approved and reduced to \$5,200 on 04/19/2023 with a payment schedule of \$400 per month on schedule with payments

D. Resolution: PENDING

6. **KYLE MCLENNAN, BRUCE R MCLENNAN (VENETA) 88680 LYNETTE LANE**

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 4/11/2023

C. Subsequent Action: NCP #2023-3880 (\$3,650) issued 4/11/2023; certified mail returned, legal servers are having difficulties finding the Respondent to serve the documents.

D. Resolution: PENDING

7. **APRO LLC DBA UNITED PACIFIC (SPRINGFIELD) 1795 5TH STREET**

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 March 11, 2020, and therefore is required to have testing conducted by March 11, 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 #3883 issued 04/25/2023

C. Subsequent Action: NCP #2023-3883 (\$2,250) issued 06/12/2023

D. Resolution: PENDING

8. **APRO LLC DBA UNITED PACIFIC ROCKET (SPRINGFIELD) 5720 MAIN STREET**

- 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 4, 2020, and therefore is required to have testing conducted by February 4, 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
- D. Resolution: PENDING

9. **A&A AUTO WRECKERS, INC. (JUNCTION CITY) 91993 GREEN HILL ROAD**

- 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 – Cleanup of property ahead of schedule.
- D. Resolution: PENDING

For a perspective of the total number of enforcement actions for calendar year 2023 compared to previous years

Year	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	*2023
Notices of Non-compliance and Warnings	51	36	38	41	39	41	55	15	21	24	16
Notices of Violation with Civil Penalties	23	28	37	37	28	43	37	26	17	24	12

* Year-To-Date

OUTDOOR BURNING LETTER PERMITS: 09/01/2023 to 09/30/2023

There were no Outdoor Burning Letter Permit (OBLP) issued in September.

ASBESTOS ABATEMENT: 09/01/2023 to 09/30/2023

During September, LRAPA received 46 notices of asbestos removal projects, none of which were schools.

For perspective, here is how the total number of asbestos abatement notices filed, how many were schools and the number of notices inspected for calendar year 2023 compares to previous years:

Year	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	*2023
Total Asbestos Abatement Notices	351	352	426	444	543	428	488	439	408	465	367
School Asbestos Abatement Notices (NESHAP)	24	21	24	27	28	24	16	25	20	16	15
Number of Asbestos Abatements Inspected	96	67	89	82	120	770	94	93	104	115	72

* Year-To-Date

PERMITTING (TITLE V AND ACDP): 09/01/2023 to 09/30/2023

LRAPA currently permits 14 Title V sources and approximately 275 Air Contaminant Discharge Permit (ACDP) sources. Below are the total numbers of permit activities that are new, renewals, modifications, construction approvals, registration applications, terminated and/or total issued permits the Operations staff currently have in process.

Category of Permit Activity	Title V	ACDP	Registration	Total Active
New	1	5	-	6
Renewals	5	9	-	14
Modifications	1	2	-	3
Constructions	-	-	-	-
Registrations	-	-	-	-
Terminated Permits	-	-	-	-
Total Issued Permits Year-to-date	5	43	-	48

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.

November 2023:

- Budget Update QR 1
- Airmetrics Business Plan Update
- Oakridge Air Project Status Report
- Rulemaking 47 request

December 2023(*optional*):

- Supplemental Budget
- Recruitment Director position

January 2024:

- Preview upcoming appointments on board and committees.
- Budget Committee Meeting supplemental budget FY24
- Supplemental Budget FY24
- Audit FY23 report
- Rulemaking request

February 2024:

- Elect board chair and vice-chair
- Appoint new budget committee members and budget officer
- Budget forecasting models
- Budget Update QR 2

September 2023 Public Affairs, Monthly Summary

Smoke management from wood stoves, outdoor burning, and wildfires

Fire concerns persisted into September; however, the air quality impact from local wildfires has notably diminished. As we transition into the fall season, there has been an uptick in outdoor burning complaints, most likely from rural residents initiating outdoor burns ahead of the official opening of the fall outdoor burning season. Preparation for the home wood heating season is in full swing. LRAPA has disseminated home wood heating exemption applications and is currently in the process of accepting and reviewing candidates for the program. Additionally, improvements to the LRAPA outdoor burning webpage are in the pipeline, thanks to a work order submitted to our website vendor. These updates are expected to roll out in the coming weeks. Finally, we have arranged for home wood heating messages to be displayed on a reader board in Oakridge as the Home Wood Heating season commences.

Public outreach efforts

LRAPA has been diligently working on community engagement. We recently presented information on air quality monitoring and accessing AQI to the Jefferson Westside Neighbors. This presentation also covered our ongoing efforts to protect indoor air quality. Furthermore, LRAPA continues to engage collaboratively with local residents, regulatory bodies, and government entities on soil remediation activities concerning J.H. Baxter, a closed wood preservation business in West Eugene.

Public Meetings, Hearings, and Events

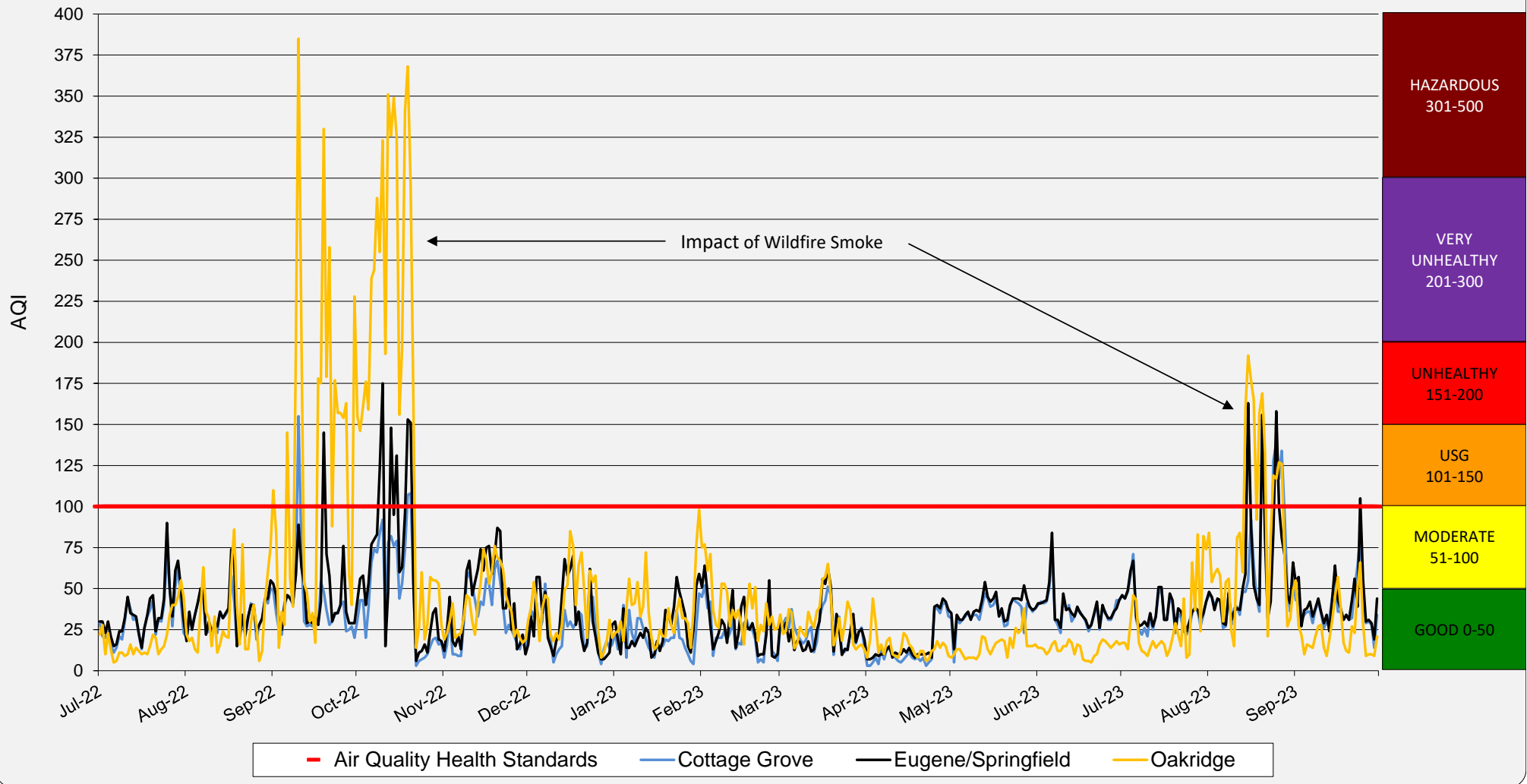
Public affairs were present or participated in the following events:

- Jefferson Westside Neighbors Air Quality Presentation – September 12, 2023 | 6:30 pm – 7:30 pm
- J.H. Baxter Public Meeting – September 19, 2023 | 6:00 pm – 7:30 pm

	DATE	MEDIA	REPORTER	TOPIC
Media Contacts	09-15-2023	KLCC	Karen Richards	Air Quality & Lookout Fire
Press Releases	09-11-2023	Rivers to Ridges plans strategic ecological burns for 2023 in key areas of Lane County		
	09-28-2023	Delay in fall outdoor burning season until October 15		

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

