



**LRAPA BOARD OF DIRECTORS
AGENDA ITEM SUMMARY**

Director’s Report for June 2021

Meeting Date: July 8, 2021
Department: Director’s Office
www.lrapa.org

Agenda Item No. 9
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AIR QUALITY: 06/01/2021 to 06/30/2021

June

Site	Date	Max AQI	Pollutant
Eug/Spfld	27-Jun-21	74	PM
Oak	21-Jun-21	38	PM
CottGrv	27-Jun-21	71	PM

AQI	Eug/Spfld	Oak	CottGrv	Range
Good	27	30	28	0-50
Moderate	3	0	2	51-100
USG	0	0	0	101-150
Unhealthy	0	0	0	151-200
Very Unhealthy	0	0	0	201-300
Hazardous	0	0	0	201-300

Attachment No. 1: Air quality index charts for Eugene/Springfield (June 2021)

Attachment No. 2: Air quality index charts for Oakridge (June 2021)

Attachment No. 3: Air quality index charts for Cottage Grove (June 2021)

COMPLAINTS: 06/01/2021 to 06/30/2021 [TOTAL: 147]

- Smoke – 37** total smoke complaints: 30 for outdoor burning; 3 for home wood heating; 3 for agricultural burning; and 1 for smoke from BBQ.
- Industry – 100** total complaints: 7 for JH Baxter; *92 for International Paper; and 1 for Ron’s Oil for topping off.
- Miscellaneous/Unknown/Dust – 10** total miscellaneous complaints: 1 for fugitive dust; 1 for jet fuel fumes; 1 for general air quality; 1 for asbestos; 4 for unknown odors; 1 for a coffee roaster and 1 for porta-potty odors.

For perspective, here is how the total number of complaints received for calendar year 2021 compares to previous years:

Year	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	*2021
Fugitive Dust	33	44	30	14	25	32	25	26	15	17	10
Ag/Field Burning	13	1	17	4	12	9	1	0	6	2	5
General Air Quality	6	6	26	30	15	20	14	6	12	4	4
Home Wood Heating	135	95	219	121	342	130	197	126	128	74	32
Industry	169	128	122	127	52	58	74	50	170	100	169
Outdoor Burning	341	268	321	279	251	266	281	351	402	423	154
Slash Burning	16	7	5	7	11	26	13	24	16	12	10
Miscellaneous	101	79	52	57	85	164	138	66	67	59	21
Unknown	25	17	14	35	46	56	63	29	39	74	26
Total	839	645	645	806	839	761	806	678	855	765	431

* Year-to-date.

* There were 90 complaints received from a couple residents that live near International Paper.

ENFORCEMENT: 06/01/2021 to 06/30/2021

Category of Violation	New	Follow-Up Action	Pending	Closed	Total
Asbestos	1	-	-	-	1
Industrial	4	-	-	-	4
Outdoor Burning	2	-	1	1	4
Fugitive Dust	-	-	-	-	-
Home Wood Heating	-	-	-	-	-
Totals	7	-	1	1	9

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 2021 compares to previous years:

Year	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	*2021
Notices of Non-compliance and Warnings	64	41	51	36	38	41	39	41	55	15	12
Notices of Violation with Civil Penalties	42	29	23	28	37	37	28	43	37	26	10

* Year-to-date.

OUTDOOR BURNING LETTER PERMITS: 06/01/2021 to 06/30/2021

There were no Outdoor Burning Letter Permits (OBLPs) issued in June.

ASBESTOS ABATEMENT: 06/01/2021 to 06/30/2021

During June, LRAPA received 46 notices of asbestos removal projects, 4 of which were schools (Triangle Lake School, Mapleton Elementary School, Kennedy Middle School and Gilham Elementary 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 2021 compares to previous years:

Year	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	*2021
Total Asbestos Abatement Notices	357	324	351	352	426	444	543	428	488	439	213
School Asbestos Abatement Notices (NESHAP)	61	53	24	21	24	27	28	24	16	25	10
Number of Asbestos Abatements Inspected	106	90	96	67	89	82	120	77	94	93	57

* Year-to-date.

PERMITTING (TITLE V AND ACDP): 06/01/2021 to 06/30/2021

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 issued permits the Operations staff currently have in process.

Category of Permit Activity	Title V	ACDP	Registration	Total Active
New	-	5	-	5
Renewals	7	14	-	21
Modifications	-	2	-	2
Constructions	-	-	-	-
Registrations	-	-	-	-
Terminated Permits	-	-	-	-
Issued Permits	5	26	-	31
*Total	12	47	-	59

* 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.

Week of June 5-11, 2021

See: <http://www.4cleanair.org/sites/default/files/Documents/WashingtonUpdate-2021-06-11.pdf>

- EPA Will Reconsider Previous Administration’s Decision to Retain 2012 PM NAAQS
- EPA Administrator Testifies Before Senate Appropriations Subcommittee on EPA’s FY 2022 Budget Proposal

Week of June 19-25, 2021

See: <http://www.4cleanair.org/sites/default/files/Documents/WashingtonUpdate-2021-06-25.pdf>

- NACAA Submits Written Testimony on FY 2022 Appropriations to Senate

PUBLIC INFORMATION – Travis Knudsen

On-Going

Public outreach and engagement remained a focus throughout June 2021 for LRAPA’s public affairs department.

LRAPA hosted a virtual public meeting to provide information on LRAPA’s implementation of Cleaner Air Oregon (CAO) in Lane County, as well as to hear community questions and concerns about air quality issues in the region. The meeting was a precursor to additional, facility specific, meetings which will occur over the next few months – beginning with Seneca Sustainable Energy, LLC. in late July/early August. LRAPA also

published a survey on their website in early June, asking for feedback and input from the community on several air quality issues. Spanish interpreters were present for the meeting, and the survey is open in both English and Spanish.

Our online survey, as well as a recording of the June 15 meeting, with a written meeting summary, and .pdf copies of presentations given at the meeting, are posted on our website here:

<https://www.lrapa.org/338/Community-Engagement>

In addition to our June 15th meeting, public affairs participated in two community meetings:

- Beyond Toxics West Eugene Monthly Community Meeting – Wednesday June 9th, 2021
 - Heard what information the community wants to be included in LRAPA's June 15th meeting.
- J.H. Baxter Community Core Team – Wednesday June 23rd, 2021
 - Described what agencies are doing differently in response to these community meetings.
 - Laid out the next steps for DEQ soil cleanup, and CAO engagement on J.H. Baxter.

Public affairs participated in pre-season wildfire smoke calls with Oregon and Washington to coordinate and prepare for the 2021 wildfire season. LRAPA's role in Oregon's coordination is described in the [Oregon Wildfire Response Protocol for Severe Smoke Episodes](#).

LRAPA is preparing to send postcards to neighborhoods surrounding facilities in, or soon to be in, the Cleaner Air Oregon program. These postcards will invite neighbors to participate in our survey, which is designed to inform LRAPA what methods specific neighborhoods want the agency to use to engage them on facilities moving through Cleaner Air Oregon.

The public affairs department devoted substantial time in June to LRAPA's application for the EPA's 2021 Targeted Airshed Grant for the Oakridge/Westfir non-attainment area. The grant submittal requests \$2,748,213 in additional funding to further the Oakridge Air program. This grant would supply funding for 50 additional homes to be entered into the program. It would also provide funding for public education of air quality issues in the community, install a reader board in Oakridge, and fund research on the health benefits of those who go through the Oakridge Air program.

Media Contacts	DATE	MEDIA	PERSON	TOPIC
	6/4	UO SOJC Student	Victoria Ginzburg	Air toxic emissions in W. Eugene
	6/21	KVAL	Mark Furman	S-503 Wildfire impact on AQ
	6/22	RG	Adam Duvernay	Cleaner Air Oregon – SSE

Meeting/Events	DATE	DESCRIPTION
	6/1	CAO Public Meeting Preparatory meeting
	6/3	Monthly Air Toxics Technical and Communications Call with DEQ
	6/3	Facility Tour of Seneca Sustainable Energy
	6/3	Oakridge Air Quarterly Meeting
	6/3	JHB Coordinating Agency Technical Team
	6/7	Coordinating with meeting Beyond Toxics on LRAPA's public meeting on Cleaner Air Oregon
	6/9	Beyond Toxic's community meeting
	6/10	LRAPA Board Meeting
	6/10	JHB Coordinating Agency Technical Team
	6/10	Virtual Community Meeting on Owens-Brockway
	6/11	Coordinating with meeting OHA on LRAPA's public meeting on Cleaner Air Oregon
	6/14	EPA/LRAPA/ODEQ Check-in meeting

6/15	PM2.5 SIP Planning, & Emissions Inventory meeting for Targeted Air Shed Grant Application
6/15	JHB Coordinating Agency Technical Team subgroup meeting for JHB storyboard
6/15	LRAPA's Community Meeting on Cleaner Air Oregon
6/17	JHB Coordinating Agency Technical Team
6/21	LRAPA-GC Oakridge Air check-in call
6/21	SIP-Maintenance Plans Meeting with DEQ, Topic: - Contingency Triggers
6/22	Washington Smoke Episodes Coordination Group call
6/23	JH Baxter Community Core Team Meeting
6/24	JHB Coordinating Agency Technical Team subgroup meeting for JHB Communications Planning
6/24	JHB Coordinating Agency Technical Team
6/25	Statewide AQ Advisory Meeting
6/29	LRAPA's Citizen Advisory Committee meeting
6/30	Smoke Ready Week outreach assessment
6/30	Oakridge PM2.5 Maintenance Plan, Rulemaking Process

Press Releases

6/7	LRAPA publishes public survey and announces an air quality community meeting on June 15.
6/14	Tuesday June 15 is the last day for spring outdoor burning in Lane County.
6/25	Historic heatwave could result in reduced air quality this weekend.

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.

June 2021:

- ~~Status report on Oakridge Air Program.~~
- ~~Public Comment Discussion~~
- ~~Cleaner Air Oregon Update~~
- ~~LRAPA Authority Interpretation Discussion~~
- ~~Industry Enforcement – Discovery Action~~
- ~~LRAPA status after 60 days with new Director:~~
 - ~~Re-org~~
 - ~~Recruitment progress~~
 - ~~Looking forward~~
 - ~~CAO Community Engagement~~

July 2021:

- R. Anthony Jones Appeal to Board for NCP 20-3818

August 2021: No meeting.

September 2021:

- Review 2021 Legislative Session and state general fund decisions.
- Discuss local dues request to IGA partners for FY2023.

October 2021:

- Dashboard update and priorities review.
- Status report on Oakridge Air Program.

November 2021:

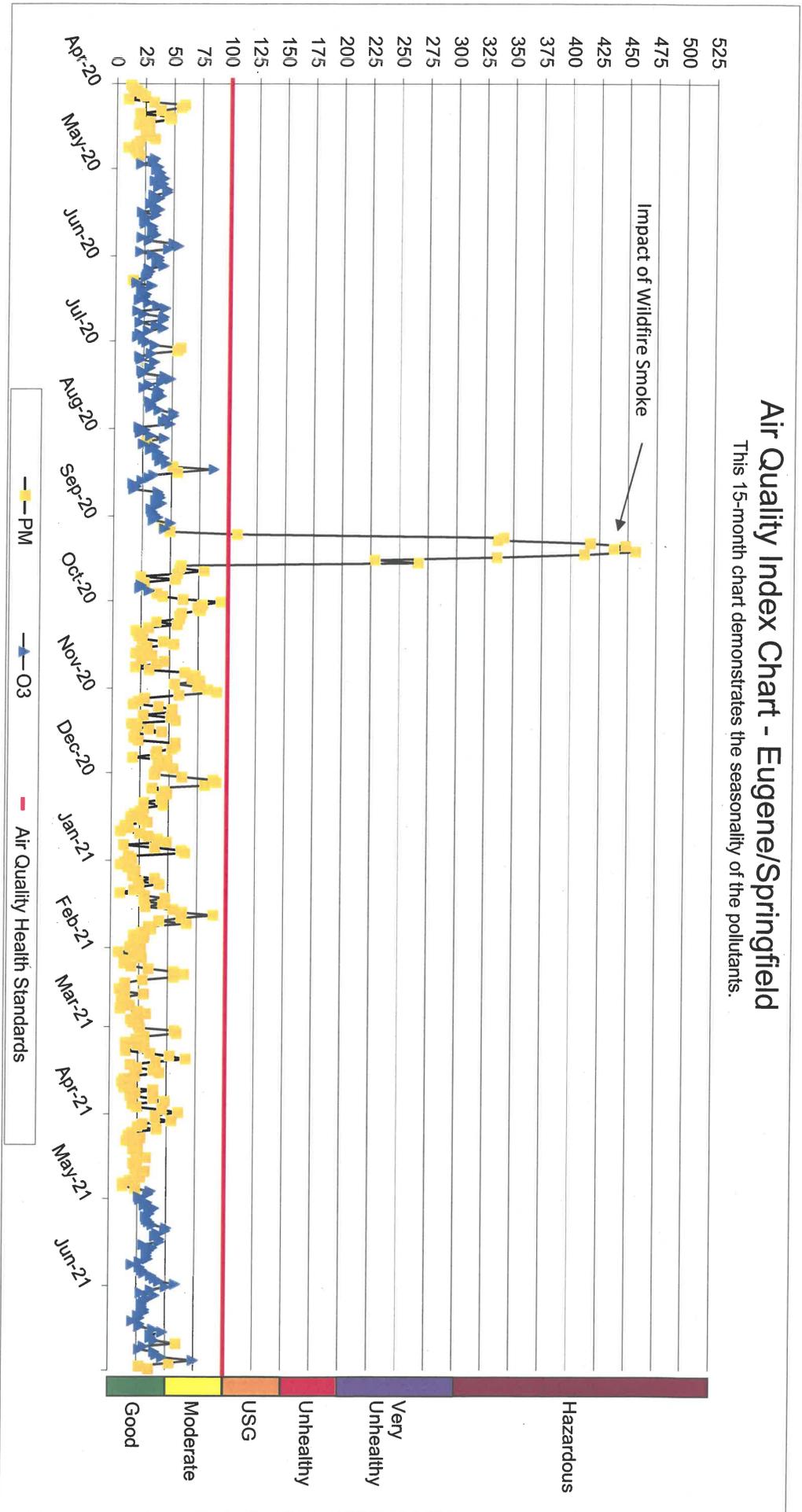
- Auditor report for FY2021.
- Approve local dues request to IGA partners for FY2023.

December 2021: No meeting.

January 2022:

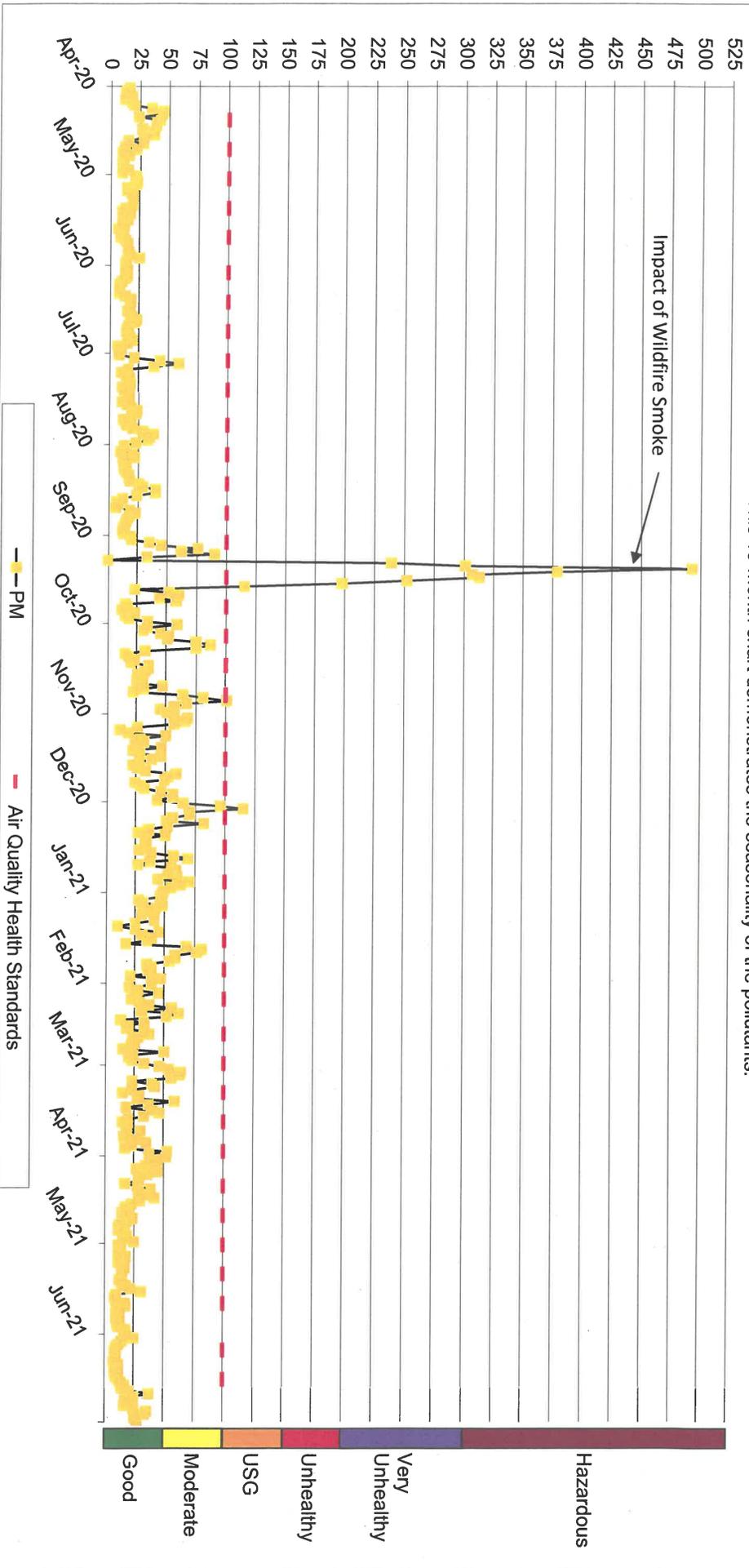
- Preview upcoming appointments on board and committees.
- Status report on Oakridge Air Program.
- Review multi-year budget forecast for FY2022-2026.

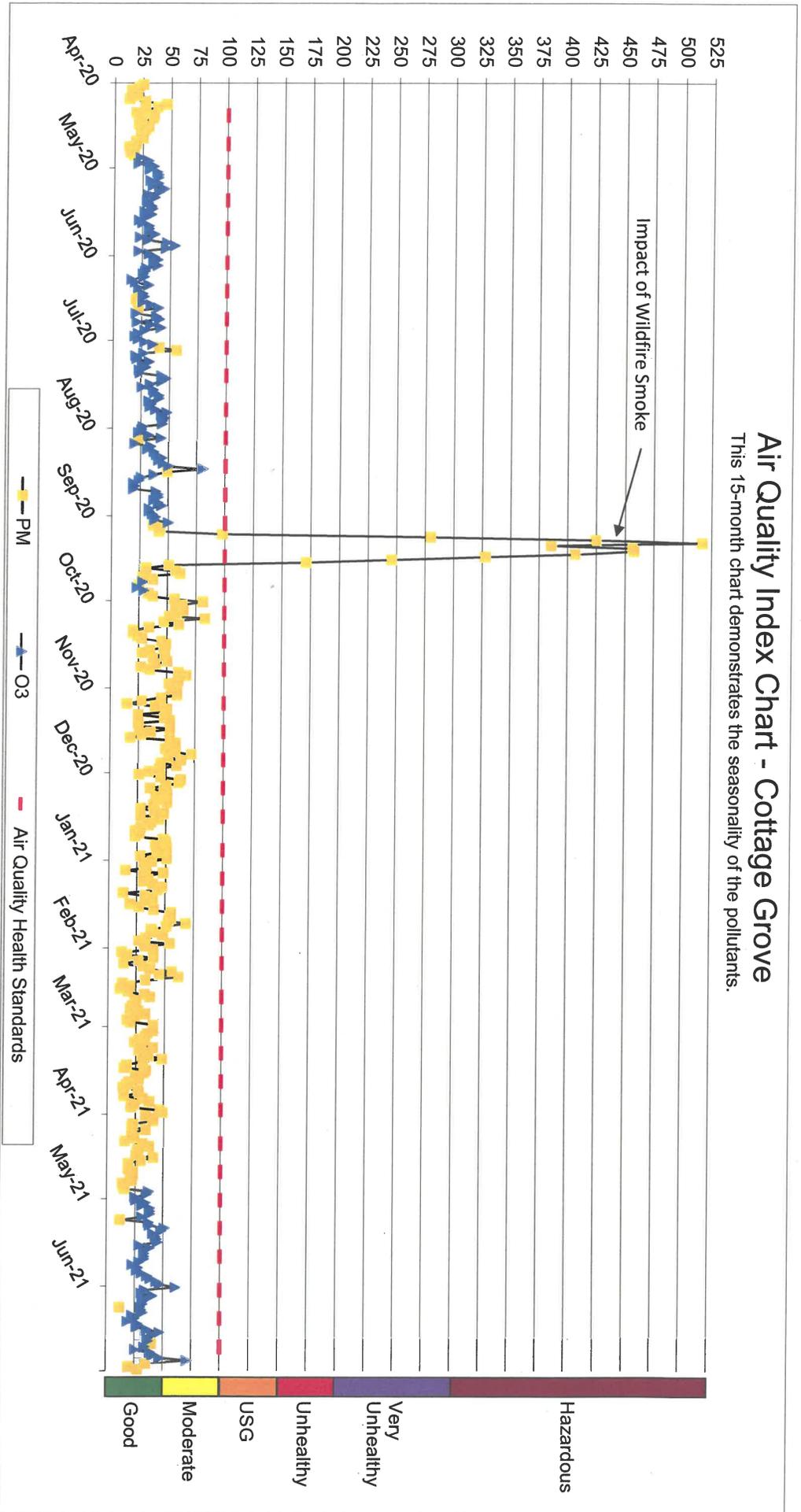
SAD/cmw



Air Quality Index Chart - Oakridge

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





NEW/OPEN ENFORCEMENT ACTIONS STATUS REPORT
6/1/2021 -- 6/30/2021
Report of open and actions initiated since last report

NEW: 6/1/2021 -- 6/30/2021

1. LANE COUNTY SHORT MOUNTAIN LANDFILL (EUGENE)
 - A. Violation: Failure to cover active asbestos containing waste materials (acwm) disposal area at the end of each day that new acwm is disposed of with tarp that is identical to, or equivalent of, materials used to cover active areas of the general landfill.
 - B. Initial Action Taken: NON #3830 issued 6/17/2021
 - C. Subsequent Action: PENDING
 - D. Resolution: PENDING

2. ATEZ, INC. (HARRISBURG)
 - A. Violation: Failure to adequately wet asbestos containing materials during cutting or disjoints operation; 43-015-11.E.(2) - Failure to carefully lower units or sections to the ground level, not dropping them or throwing them; 43-015-11.F.(1) - Failure to adequately wet the materials to ensure that they remain wet until they are disposed of in accordance with 43-015-19; 43-015-11.F.(2) - Failure to carefully lower the materials to the floor, not dropping or throwing them.
 - B. Initial Action Taken: NON #3833 issued 6/16/2021
 - C. Subsequent Action: NCP #2021-3833 (\$4800) issued 6/16/2021:
 - D. Resolution: PENDING

3. J.H. BAXTER & CO., EUGENE PLANT (EUGENE)

- A. Failure to provide for an asbestos survey prior to commencing renovation or demolition of a facility; failure to abide by asbestos abatement notification and fee requirements; failure to abide by asbestos abatement negative pressure enclosure requirements; failure to adequately wet asbestos containing material; failure to adequately clean project area at conclusion of abatement project; failure to secure asbestos containing waste at project site; open storage of asbestos containing waste; conducting an asbestos abatement without possessing a current license or certification; failure to abide by friable asbestos disposal requirements.
- B. Initial Action Taken: NON #3834 issued 6/2/2021
- C. Subsequent Action: NCP #2021-3834 (\$7,800) issued 6/24/2021
- D. Resolution: PENDING

4. JOHNSON CRUSHERS INTERNATIONAL (EUGENE)

- A. Violation: Failure to conduct weekly monitoring for fugitive emissions; failure to maintain records of fugitive emission surveys; failure to conduct weekly point source emissions monitoring; failure to maintain records of point source emissions monitoring.
- B. Initial Action Taken: NON #3837 issued 6/25/2021
- C. Subsequent Action: PENDING
- D. Resolution: PENDING

5. OREGON INDUSTRIAL LUMBER PRODUCTS, I (SPRINGFIELD)

- A. Violation: Respondent continues to operate wood fired boiler in such a manner as to cause the deposition of ash fallout on the property of other persons and has failed to correct the issue in a timely manner.
- B. Initial Action Taken: NON #3838 issued 6/21/2021
- C. Subsequent Action: PENDING
- D. Resolution: PENDING

6. VOSBURG, ELIZABETH (VENETA)

- A. Violation: Outdoor burning such as to cause a public nuisance or hazard; outdoor burning of prohibited materials; failure to conduct efficient outdoor burning; outdoor burning of construction/demolition debris without first obtaining an Outdoor Burning Letter Permit from LRAPA.
- B. Initial Action Taken: NON #3832 issued 6/04/2021
- C. Subsequent Action: NCP #2021-3832 (\$613) issued 6/4/2021
- D. Resolution: PENDING

7. CONTRERAS, JOSE (SPRINGFIELD)

- A. Violation: Outdoor burning when prohibited; outdoor burning such as to cause a public nuisance or hazard; outdoor burning of construction/demolition debris without first obtaining an Outdoor Burning Letter Permit from LRAPA
- B. Initial Action Taken: NON #3835 issued 6/04/2021
- C. Subsequent Action: NCP #2021-3835 (\$775) issued 6/4/2021
- D. Resolution: PENDING

ACTIONS PERFORMED (NON issued prior to 6/1/2021 with current action in reporting period):

1. BONAR, LANCE (CRESWELL)

- A. Violation: Outdoor burning when prohibited; outdoor burning such as to cause a public nuisance or hazard; outdoor burning of prohibited materials; outdoor burning of construction/demolition debris without first obtaining a Letter Permit from LRAPA.
- B. Initial Action Taken: NON #3828 issued 3/5/2021
- C. Subsequent Action: NCP #2020-3828 (\$1,650) issued 3/5/2021: no response, default order judgment in process for a lien on the property
- D. Resolution: CASE CLOSED on 6/9/2021

PENDING (NON issued prior to 6/1/2021 with no action in reporting period):

1. 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 5/15/2020
 - C. Subsequent Action: NCP #2020-3818 (\$700) issued 5/27/2020: request for hearing scheduled and held on 11/13/2020; On 12/15/2020, the Hearing's Officer held up the violations however, adjusted the civil penalty from \$700 to \$600; Respondent has 30 days from 12/29/2020 to request an appeal or pay the \$600 adjusted civil penalty; 01/13/2021 Respondent request an Appeal to the LRAPA Board; 1/14/2021 Respondent was sent letter with details on requirements for the Request for Appeal to the Board - Respondent has 30 days from 02/13/2021 to submit Exceptions and Brief, Respondent submitted Appellee's Brief 02/11/2021; On 03/01/2021, LRAPA's attorney submitted Appellee's Answering Brief; no Reply Brief was submitted by Respondent; the Appeal to the LRAPA Board of Director's is scheduled for 07/08/2021.
 - D. Resolution: PENDING