



AGENDA

LANE REGIONAL AIR PROTECTION AGENCY
MONTHLY BOARD OF DIRECTORS MEETING
THURSDAY MARCH 14, 2024

11:00 A.M.

Virtual Participation

By Video: <https://us02web.zoom.us/j/82551664224>

By Audio: +1 253 215 8782

Meeting ID: 825 5166 4224

[Note: Start times for agenda items are approximate.]

In-Person Participation

Jesse Maine Meeting Room

Springfield City Hall

225 5th Street

Springfield, OR 97477

CALL TO ORDER:

1. **Call to Order** (11:00 a.m.)
2. **Appoint Budget Committee Members and Budget Officer** (11:00 a.m.)
3. **Recess of LRAPA Board Meeting for Budget Committee Meeting** (11:05 a.m.)

BUDGET COMMITTEE MEETING – See attached Budget Committee agenda.

4. **Reconvene LRAPA Board Meeting** (12:15 p.m.)
5. **Adjustments to Agenda** (12:15 p.m.)
6. **Public Participation (time limited to three minutes per speaker)** (12:20 p.m.)

A. **Comments on an Item on Today's Agenda**

B. **Comments on a Topic Not Included on Today's Agenda**

(Note: This is an opportunity for the public to bring up unscheduled items. The Board may not act at this time but, if it is deemed necessary, place such items on future agendas. Issues brought up under this agenda item are to be limited to three minutes' speaking time by the person raising the issue. If additional time is necessary, the item may be placed on a future agenda.)

7. **Comments from Board Members** (Note: This is an opportunity for Board Members to bring up unscheduled items regarding today's public comments, and/or written/electronic comments they have received. The board may not act at this time but if it deems necessary place such items on future agendas.)

8. **Consent Calendar** (12:25 p.m.)

A. Approval of Minutes for February 8, 2024, Board of Directors Meeting

B. Financial Report January 2024

9. **Citizens Advisory Committee** (12:30 p.m.)

Action

A. Jim Daniels

B. Report

C. CAC Reappointment: Evelina Davidova-Kamis

10. Supplemental Budget (12:40 p.m.) *Action*

- A. Susannah Sbragia
- B. Staff Report
- C. Resolution 24-3

11. Title 47 Outdoor Burning Rules Public Hearing (12:45 p.m.) *Action*

- A. Travis Knudsen
- B. Staff Report
- C. Board Discussion

12. EPA Public Comment Consideration: Air Curtain Incinerators (1:00 p.m.) *Action*

- A. Travis Knudsen
- B. Staff Report
- C. Board Discussion

13. Scribner's Cleanup of Employee Handbook (1:20 p.m.) *Action*

- A. Susannah Sbragia
- B. Staff Report
- C. Board Discussion

14. Director's Report (1:25 p.m.) *Information*

- A. Management Team
- B. Staff Report
- C. Board Discussion

EXECUTIVE SESSION

LRAPA Executive Session (1:30 p.m.) *Information*

[Click here to join the meeting](#)

Meeting ID: 215 007 835 277 | Passcode: ErETGX | [Download Teams](#) | [Join on the web](#)

The Lane Regional Air Protection Agency's Board of Directors will now meet in executive session pursuant to ORS 192.660(2)(f), for the purpose of considering information and records that are exempt from disclosure by law, including written advice by counsel.

15. Return to Open Session (2:10 p.m.)

16. Adjournment of LRAPA's March 2024 Board Meeting (2:15 p.m.)

We endeavor to provide public accessibility to LRAPA services, programs, and activities for people with disabilities. People needing special accommodations to participate in LRAPA public hearings such as assistive listening devices or accessible formats such as large print, Braille, electronic documents, or audio tapes, should please contact the LRAPA office as soon as possible, but preferably at least 72 hours in advance. For people requiring language interpretation services, including qualified ASL interpretation, please contact the LRAPA office as soon as possible, but preferably at least 5 business days in advance so that LRAPA can provide the most comprehensive interpretation services available. Please contact the LRAPA Nondiscrimination Coordinator at accessibility@lrapa.org or by calling the LRAPA office at 541-736-1056.

Nos esforzamos por proporcionar accesibilidad pública a los servicios, programas y actividades de LRAPA para personas con discapacidades. Las personas que necesiten adaptaciones especiales, como dispositivos de asistencia auditiva, formatos accesibles como letra grande, Braille, documentos electrónicos o cintas de audio, deben comunicarse con la oficina de LRAPA con al menos 72 horas de anticipación. Para las personas que requieren servicios de interpretación de idiomas, incluyendo la interpretación calificada de ASL, comuníquese con la oficina de LRAPA al menos con 5 días laborables de anticipación para que LRAPA pueda proporcionar los servicios de interpretación que sean lo más completos disponibles. Para todas las solicitudes, envíe un correo electrónico al Coordinador de Antidiscriminatoria de LRAPA a accessibility@lrapa.org o llame a la oficina de LRAPA al 541-736-1056.



AGENDA

LANE REGIONAL AIR PROTECTION AGENCY
BUDGET COMMITTEE MEETING
MONTHLY BOARD OF DIRECTORS MEETING
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BUDGET COMMITTEE MEETING

- | | |
|--|--------------------|
| 1. Call to Order (11:00 a.m.) | |
| 2. Introductions (11:05 a.m.) | |
| 3. Election of Budget Chair & Vice-Chair, & Budget officer (11:10 a.m.) | <i>Action</i> |
| 4. Supplemental Budget Review (11:15 a.m.) | <i>Information</i> |
| 5. Q & A (11:40 p.m.) | <i>Discussion</i> |
| 6. Adjournment of LRAPA Budget Committee Meeting (12:00 p.m.) | |

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**BOARD OF DIRECTORS
MEETING MINUTES
FEBRUARY 8, 2024**

MEETING VIA ZOOM/ LRAPA BUILDING, SPRINGFIELD OREGON

ATTENDANCE	
BOARD PRESENT:	STAFF PRESENT:
Director Howard Saxion	Susannah Sbragia, Interim Director
Director Mike Fleck	Travis Knudsen, Public Affairs Manager
Director Jared Hensley	Max Hueftle, Operations Manager
Director Michael Johnston	Colleen Wagstaff, Finance & Enforcement Manager
Director David Loveall	Lance Giles, Technical Services Manager
Director Joe Pishioneri	Jenilee Easter, Finance Manager
	Heather Gravelle, Administrative Assistant
BOARD ABSENT/EXCUSED:	Qiyu Liu, Permit Writer
Chair Bryan Cutchen	Beth Erickson, Permit Writer
Director Dylan Plummer	Robbye Robinson, Finance & Permit Coordinator
Director Matt Keating	
	OTHERS PRESENT:
	Blake Hutchins
	Jim Daniels
	James Hugo
	Lisa [Lastname unknown]

AGENDA	ACTION
REGULAR MEETING	
1. Call to Order.	Vice-Chair Howard Saxion called the regular meeting to order at 12:15 p.m.
2. Adjustments to the Agenda.	Susannah Sbragia , Interim Director, introduced Qiyu Liu as the Agency’s new Environmental Engineer/Permit Writer.
3. Public Participation. A. Comments on an Item on Today’s Agenda. B. Comments on a Topic Not Included on Today’s Agenda.	James Hugo conveyed the importance of LRAPA’s next Executive Director focusing on public outreach and showing a genuine commitment to the environment. Additionally, he raised a question regarding the decision-making authority in the final hiring process.

4. Comments from Board Members.	Director Saxion acknowledged that the Board has engaged Karras Consulting to support the recruitment process for the next Executive Director. He emphasized that the final decision will be made collectively by the entire Board.
5. Consent Calendar. A. Approval of Minutes for January 11, 2024, Board of Directors Meeting. B. Approval of Financial Report December 2023.	MOTION: Director Loveall moved, and Director Fleck seconded the approval of the Consent Calendar. The motion passed unanimously.
6. Citizens Advisory Committee.	Jim Daniels , Chair of the Citizens Advisory Committee (CAC), gave the board an overview of the January 2024 CAC meeting.
7. Elect Chair and Vice-Chair.	Director Pishioneri nominated Director Saxion for the position of Chair. Vote: 5-0 in favor of the nomination. Director Pishioneri nominated Director Loveall for the position of Vice-Chair. Vote: 5-0 in favor of the nomination.
8. Consideration of Potential Variance for Title 47.	Director Pishioneri read the following Proposal of Findings and Variances into the record: Proposal of Findings 01-020824: The City of Springfield experienced a significant ice storm in January 2024 that caused significant damage to properties in the City and hardship to City residents from fallen trees and branches, widespread damage to commercial and residential building structures, substantial quantities of wood debris, loss of power, obstruction of roads, driveways, and public spaces; and The State of Oregon issued a declaration of emergency for parts of the state impacted by the ice storm; and The City of Springfield issued a declaration of emergency for the City until Feb. 27, which the City at its discretion may extend based on its assessment of circumstances that may justify such extension; and That relief from strict compliance with LRAPA rules regarding the burning season and outdoor burning of green wood is necessary to protect the public health and welfare; and That strict compliance with these rules is inappropriate because the ice storm and its impact were beyond the control of the residents of Springfield; and

	<p>That the damage and accumulation of woody debris caused by the ice storm present an exceptional burden on the residents and businesses of the City of Springfield, and other alternatives are overburdened and not readily available to a significant number of City residents; and</p> <p>The impact on the public health and welfare during the emergency exceeds the impact thereto of variance from the rules under consideration.</p> <p>Variance 20240208-1:</p> <p>Based on the findings of the Board and the February 8, 2024, letter from the City of Springfield for a variance, LRAPA shall grant a variance to the particular requirements of LRAPA Rule Title 47, paragraph 015(1)(f) for:</p> <p>Residential property owners located within the City of Springfield regarding the outdoor burning season length, permitting outdoor burns compliant with the Springfield Fire Code from February 8, 2024, to March 1, 2024.</p> <p>Variance 20240208-2:</p> <p>Based on the findings of the Board and the February 8, 2024, letter from the City of Springfield for a variance, LRAPA shall grant a variance to the requirements of LRAPA Rule Title 47, paragraph 015(2)(d) for:</p> <p>Residential property owners located within the City of Springfield regarding the restrictions on burning green wood, such variance to begin on today's date and terminate when the City's declaration of emergency and any extension thereto ends, provided that LRAPA retains the discretion to pause the variance upon LRAPA determination that the air quality levels have met or exceeded PM2.5 levels are forecast to be ≥ 30 ug/m3 in compliance with Lane Code Chapter 9, section 9.025.010 "Red Advisory for Eugene-Springfield Area."</p> <p>MOTION: Director Pishioneri moved, and Director Loveall seconded to adopt Findings 01-020824; Variance 20240208-1, and Variance 20240208-2. The motion passed unanimously.</p>
9. Sale of Airmetrics.	<p>MOTION: Director Fleck moved, and Director Loveall seconded to approve Resolution 2024-02 to close the Enterprise Fund, transfer the remaining balance to the General Fund, and extend the transfer completion date to April 30, 2024. The motion passed unanimously.</p>

10. Appoint Budget Committee Members and Budget Officer.	Board members had no nominations to appoint to the Budget Committee or the position of Budget Officer.
11. Budget Forecasting Models.	Jenilee Easter , Finance Manager, delivered a PowerPoint presentation on Budget Forecasting Models to the Board.
12. Budget QR 2 Update.	Ms. Easter provided the Board with an update on the QR2 budget.
13. Schedule Work Session: Board Goals.	Ms. Sbragia shared the current goals with the Board. After discussion, the Board reached a consensus that a work session was not required. However, they emphasized their preference for goals that are both measurable and specific.
14. Directors Report.	Ms. Sbragia presented the Board with key points from the Director's Report.
15. Adjournment of LRAPA Board Meeting	Chair Saxion adjourned the Board meeting at 2:12 p.m.

(Minutes recorded by Heather Gravelle)



**CITIZEN ADVISORY COMMITTEE
MEETING MINUTES
JANUARY 30, 2024**

MEETING VIA ZOOM/ LRAPA BUILDING, SPRINGFIELD OREGON

ATTENDANCE

COMMITTEE PRESENT:	LRAPA STAFF PRESENT:
Chair Jim Daniels	Susannah Sbragia, Interim Director
Vice-Chair Kelly Wood	Travis Knudsen, Public Affairs Manager
Chris Cline	Max Hueftle, Operations Manager
Evelina Davidova-Kamis	Heather Gravelle, Administrative Assistant
Peter Dragovich	
Teresa Roark	
COMMITTEE ABSENT/EXCUSED:	OTHERS PRESENT:
Mysti Frost	Dennis Karras, CEO, Karras Consulting
Paul Metzler	Marissa Karras, Vice-President, Karras Consulting

AGENDA	ACTION
REGULAR MEETING	
1. Call to Order/Agenda Review.	Chair Jim Daniels called the regular meeting to order at noon.
2. Public Participation.	None.
3. Board Meeting Overview.	Chair Daniels provided a summary of the January 2024 Board of Directors Meeting.
4. Karras Consulting – Introductions.	Dennis and Marissa Karras , Co-Founders of Karras Consulting, introduced themselves and presented their strategy and timeline for finding LRAPA’s next Executive Director. Committee members shared their preferences for the new Director’s attributes.
5. Committee Interview Process (continued discussion).	The Committee thoroughly examined and deliberated the existing Committee application questions and reviewed and discussed potential new questions. Staff indicated they would share a link to the updated application questions on the website for members to review.

6. Roundtable.	None.
7. Adjournment.	Chair Daniels adjourned the Committee meeting at 1:00 p.m.

(Minutes recorded by Heather Gravelle)



	Prior Yr. Actuals FY 22-23 January 2022	FY 23-24 January 2023	FY 23-24 Final Budget	FY 23-24 Budget Variance
General Fund				
Revenues				
Federal & State Revenues	501,997	312,009	1,078,514	(766,505)
Local Dues	196,273	201,550	201,550	0
Permit Fees	1,196,772	1,170,963	1,260,739	(89,776)
Other Revenues	29,397	33,521	50,000	(16,479)
Total Revenue Received	1,924,439	1,718,043	2,590,803	(872,760)
Expenditures ^				
Personnel Services	979,368	1,126,327	1,761,213	64%
Materials & Services	343,135	424,192	743,870	57%
Capital Improvements	0	200,848	130,000	154%
Total Expenditures	1,322,503	1,751,367	2,505,083	70%
General Fund Net	601,936	(33,324)		

	Prior Yr. Actuals FY 22-23 January 2022	FY 23-24 January 2023	FY 23-24 Final Budget	FY 23-24 Budget Variance
Special Revenue (Title V)				
Revenues				
Permit Fees	424,246	594,144	515,417	78,730
Miscellaneous Revenue	0	0	0	0
Total Revenue Received	424,246	594,144	515,417	78,730
Expenditures ^				
Personnel Services	351,196	279,579	475,939	59%
Materials & Services	298	12,383	17,207	72%
Capital Outlay	0	0	0	0%
Total Expenditures	351,494	291,962	493,146	59%
Special Revenue Net	72,752	302,182		

	Prior Yr. Actuals FY 22-23 January 2022	FY 23-24 January 2023	FY 23-24 Final Budget	FY 23-24 Budget Variance
Grant Fund				
Revenues				
EAP Tag 1 & 2	0	469,731	1,403,000	(933,300)
Miscellaneous Revenue	0	0	0	0
Total Revenue Received	0	469,731	1,403,000	(933,300)
Expenditures ^				
Personnel Services	32,334	31,443	75,616	42%
Materials & Services	448,501	429,121	1,327,384	32%
Capital Outlay	0	1,937	0	0%
Total Expenditures	480,835	462,501	1,403,000	33%

Grant Fund Net	(480,835)	7,230		
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	Prior Yr. Actuals FY 22-23 January 2022	FY 23-24 January 2023	FY 23-24 Final Budget	FY 23-24 Budget Variance
Enterprise Fund (AirMetrics)				
Revenues				
Sales: Portable Samplers PM2.5	205,823	161,302	243,000	(81,700)
Sales: Portable Samplers PM10	0	11,246	100,000	(88,800)
Sales: Portable Samplers TSP	0	4,176	50,000	(45,800)
Sales: Portable Samplers APM	0	752	50,000	(49,200)
Sales: Accessories	48,466	47,385	103,000	(55,600)
Sampler Rental Income	700	0	6,300	(6,300)
Sampler Calibration Fee	2,070	1,050	8,050	(7,000)
Interest, Misc. & Freight	18,864	22,181	23,289	(1,100)
Total Revenue Received	275,923	248,092	583,639	(335,547)
Expenditures ^				
Personnel Services	88,492	110,714	160,870	69%
Materials & Services	191,590	214,258	397,269	54%
Capital Outlay	0	0	0	
Total Expenditures	280,082	324,972	558,139	58%
* % Spent is YTD Actuals divided by FY Budget.: Red: 91% & above / Yellow: 81%-90% / Green: up to 80%				
Airmetrics Net	(4,159)	(76,880)		
** This is the close out month for AirMetrics.				
^ does not include Transfers & Contingencies				

Citizen's Advisory Committee Application

Name

Evelina Davidova

Address

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]

Email

[REDACTED]

Community Segment

Industry - \$0.00

Why do you want to become a member of the committee?

I have always been passionate about nature and preserving its sources for current and future generation. I would like to contribute my so far accumulated knowledge and expertise to the CAC meetings.

Please give a brief description of any experience or training that qualifies you for this position:

I have a degree in Environmental Engineering, and I have worked 10 years as Environmental Manager at States Industries.

Please list the community concerns or topics you would like to see addressed by this committee:

Discuss potential air pollution sources locally. Develop ideas to minimize the impact of these sources on air quality and human health.

Anything related to Industry Air Permits is of interest to me as well.

Briefly describe your present or past involvement in relevant community groups. Please note that having no previous involvement will not disqualify you for appointment:

Currently a Citizen Advisory Committee Member of LRAPA.

Are you currently serving on any advisory boards or committees? If so, which ones?

No

This committee meets over the noon hour once a month, generally the last Tuesday. Are you available during this time?

YES



**LANE REGIONAL AIR PROTECTION AGENCY
MEMORANDUM**

To: Howard Saxion, Chair, and LRAPA Board Members

From: Susannah Sbragia, Interim Director

Date: March 14, 2024

Subject: Budget Changes

ISSUE STATEMENT

Resolution No.24-3 adopts needed appropriation adjustments for the fiscal year 2023-24.

BACKGROUND INFORMATION

In response to the approval of a building project to remodel the interior of LRAPA’s office, with construction estimated to commence in July 2024, an adjustment of the current budget allocations needs to be increased to cover pre-construction costs that are higher than estimated in the original FY24 budget that was approved on May 11, 2023. The adjustments for the General Fund are \$75,000 and will increase the appropriation expenditures, by reducing the contingency in the General Fund. This reallocation aims to ensure the project is within the timeline.

The Special Revenue Fund (Title V) budget has additional costs relating to staff changes and materials and services expenditures. The approved budget for FY24 did not include a contingency to provide for a budgetary provision set aside to cover unforeseen expenditures during a fiscal year. To address this oversight and maintain a balanced budget, revenue has increased by \$20,000, with a corresponding \$20,000 increase in appropriations.

As of January 30, 2024, Title V funds have received \$594,100, which is \$78,700 over the budgeted revenue. Oregon budget law does not require budget adjustments for revenue over budget. They do require expenditures to not go over the board-approved appropriations. Therefore, there is no immediate need to adjust the budget for revenue exceeding expenditures.

FISCAL IMPACT SUMMARY

The proposed budget change in the general fund has zero net change.

Fund/Program/Organization Unit/Object Classification	Approved Budget	Change	Amended Budget
General Fund			
Administration	2,653,084	75,000	2,728,084
Not Allocated to Org Unit.			
Transfers	-	-	-
Contingency	100,000	(75,000)	25,000
Total	2,753,084	-	2,753,084



The proposed budget change in the Special Revenue Fund (Title V) has a \$20,000 change.

Fund/Program/Organization Unit/Object Classification		Approved Budget	Change	Amended Budget
	Beg Bal	42,687		42,687
Special Revenue Fund (Title V)	Revenue	515,417	20,000	535,417
Total Revenue		558,104	20,000	578,104
Special Revenue Fund (Title V)				
	Administration			
	Title V	493,147	20,000	513,147
Not Allocated to Org Unit.				
	Transfers	15,000	-	15,000
	Contingency	-	-	-
Total appropriations		508,147	20,000	528,147
Total unappropriated and reserve amounts		49,957		49,957
Total Budget		99,914	-	99,914

STAFF RECOMMENDATION

Staff recommends the Board of Directors approve the proposed budget adjustments and the appropriations changes for the fiscal year of 2023-2024.

MOTION

Motion to approve Resolution 24-3 to increase the budget appropriations and revenue for the Special Revenue fund for the fiscal year 2023-24.

RESOLUTION #24-03

A RESOLUTION ADOPTING AN ADJUSTMENT TO THE FISCAL YEAR 2023-24 BUDGET

WHEREAS Lane Regional Air Protection Agency (LRAPA) wishes to adjust the budget to recognize corrections to the original appropriation amounts in resolution no. 24-03, as well as adjust expenditures due to unexpected costs arising during the fiscal year 2023-24.

WHEREAS the GENERAL FUND needs an additional \$75,000 from contingency, and the Special Revenue Fund needs additional revenue of \$20,000 and additional expenditures of \$20,000.

Fund/Program/Organization Unit/Object Classification		Approved Budget	Change	Amended Budget
General Fund				
	Administration	2,653,084	75,000	2,728,084
Not Allocated to Org Unit.				
	Transfers	-	-	-
	Contingency	100,000	(75,000)	25,000
Total		2,753,084	-	2,753,084

Fund/Program/Organization Unit/Object Classification		Approved Budget	Change	Amended Budget
	Beg Bal	42,687		42,687
Special Revenue Fund (Title V)	Revenue	515,417	20,000	535,417
Total Revenue		558,104	20,000	578,104
Special Revenue Fund (Title V)				
	Administration			
	Title V	493,147	20,000	513,147
Not Allocated to Org Unit.				
	Transfers	15,000	-	15,000
	Contingency	-	-	-
Total appropriations		508,147	20,000	528,147
Total unappropriated and reserve amounts		49,957		49,957
Total Budget		99,914	-	99,914

RESOLUTION #24-03

A RESOLUTION ADOPTING AN ADJUSTMENT TO THE FISCAL YEAR 2023-24 BUDGET

NOW, THEREFORE, BE IT RESOLVED BY LANE REGIONAL AIR PROTECTION AGENCY AS FOLLOWS:

Section 1. Adopts the following appropriations and revenue adjustments to the year 2023-245 budget as followed:

PRESENTED AND APPROVED BY LRAPA'S BOARD OF DIRECTORS THIS 14TH DAY OF MARCH 2024.

Howard Saxion,
Chairperson of the Board of Directors

Date

Susannah Sbragia, Interim Director

Date



LANE REGIONAL AIR PROTECTION AGENCY MEMORANDUM

To: Howard Saxion, Chair and LRAPA Board Members

From: Travis Knudsen, Public Affairs Manager

Date: March 14, 2024

Subject: Submitting Public Comment to EPA on Large Municipal Waste Combustor Standards and Air Curtain Incinerator Permitting

ISSUE STATEMENT

The Environmental Protection Agency (EPA) is currently accepting public comments on the proposed Standards of Performance for New Stationary Sources and Emission Guidelines for Existing Sources for Large Municipal Waste Combustors (MWCs). LRAPA staff has prepared a draft public comment to submit to the EPA, advocating for targeted flexibilities and regulatory relief for Air Curtain Incinerators (ACIs) used in wildfire mitigation and forest management. Staff are seeking the Board's support to submit this comment to the EPA.

BACKGROUND INFORMATION

Air Curtain Incinerators (ACIs) are a type of combustion device used to burn woody debris and other vegetative materials. ACIs use a high-velocity curtain of air to improve combustion efficiency and reduce emissions compared to open burning. ACIs can be an effective tool for managing woody debris from forestry operations, wildfire mitigation efforts, and other sources.

However, current federal regulations under the Clean Air Act require ACIs to obtain Title V operating permits, which can be a costly and time-consuming process. These regulatory requirements have created barriers to the widespread adoption of ACIs as an alternative to open burning, particularly for smaller-scale forestry and wildfire mitigation projects.

The EPA is currently proposing amendments to the Standards of Performance for New Stationary Sources and Emission Guidelines for Existing Sources for Large Municipal Waste Combustors (MWCs). As part of this rulemaking, the EPA is accepting public comments on the proposed amendments and related issues, including the regulation of ACIs.

LRAPA staff has prepared a draft public comment to submit to the EPA, which is attached to this memorandum. The key points of the comment include:

1. Support for the EPA's efforts to update emission standards for Large MWCs based on the latest available control technologies.
2. Specific feedback on the proposed emission limits, compliance timeframes, and monitoring requirements.
3. Advocacy for targeted flexibilities and regulatory relief for ACIs used in wildfire mitigation and forest management, including:



- a. Streamlined permitting processes for ACIs that meet certain design and operating criteria.
 - b. Clear guidance on the technical and economic feasibility criteria for exempting ACIs from Title V permitting requirement.
 - c. Encouraging states to develop reduced fee schedules and general permits for ACIs used for beneficial purposes.
4. Examples of challenges and barriers to ACI use from LRAPA's experiences working with local forestry agencies and organizations.
 5. Emphasis on the potential air quality and public health benefits of reducing open burning using ACIs, particularly in communities with environmental justice concerns.

Submitting this public comment aligns with LRAPA's mission to protect public health, community well-being, and the environment for the people of Lane County. By advocating for sensible regulatory flexibilities for ACIs, LRAPA can help promote the use of cleaner alternatives to open burning, reduce harmful air pollutant emissions, and support the efforts of local forestry and wildfire mitigation projects. The comment also demonstrates LRAPA's engagement with federal air quality regulations and our commitment to providing input to shape policies that impact our local communities.

STAFF RECOMMENDATION

LRAPA staff recommends that the Board express its support for the submission of the attached public comment to the EPA regarding the Standards of Performance for New Stationary Sources and Emission Guidelines for Existing Sources for Large Municipal Waste Combustors.

SUGGESTED MOTION

I MOVE TO EXPRESS THE BOARD'S SUPPORT FOR STAFF'S SUBMISSION OF THE ATTACHED PUBLIC COMMENT TO THE EPA.

ATTACHMENTS

Attachment A – Standards of Performance for New Stationary Sources and Emission Guidelines for Existing Sources: Large Municipal Waste Combustors (Docket ID No. EPA-HQ-OAR-2017-0183)



March 24, 2024

U.S. Environmental Protection Agency
EPA Docket Center
Docket ID No. EPA-HQ-OAR-2017-0183
Mail Code 28221T
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Re: Standards of Performance for New Stationary Sources and Emission Guidelines for Existing Sources:
Large Municipal Waste Combustors (Docket ID No. EPA-HQ-OAR-2017-0183)

Dear Administrator Regan:

The Lane Regional Air Protection Agency (LRAPA) appreciates the opportunity to comment on the Environmental Protection Agency's (EPA) proposed amendments to the Standards of Performance for New Stationary Sources and Emission Guidelines for Existing Sources for Large Municipal Waste Combustors (MWCs). LRAPA supports the EPA's efforts to update and strengthen emission standards for MWCs based on the latest available control technologies and a review of the maximum achievable control technology (MACT) floors. The proposed amendments will result in significant reductions of regulated pollutants, providing important public health and environmental benefits, particularly for communities with environmental justice concerns.

LRAPA is familiar with the regulatory framework for MWCs and has experience applying similar rules to other incineration units in Lane County, although there are currently no large MWCs operating within our jurisdiction. We recognize the critical need to balance environmental protection with the economic and practical realities faced by regulated entities and local communities. In reviewing the proposed amendments, we offer the following specific comments and recommendations:

1. **Emission Limits:** LRAPA supports the EPA's proposal to revise the emission limits for both new and existing large MWCs to reflect the performance of advanced control technologies such as selective catalytic reduction (SCR), advanced selective non-catalytic reduction (ASNCR), and LowNOX (LN) technology. These limits will drive significant reductions in key pollutants like nitrogen oxides (NOX), sulfur dioxide (SO₂), and particulate matter (PM). We believe the proposed limits are technically feasible and cost-effective, as demonstrated by the EPA's analysis in the rule proposal.
2. **Compliance Timeframes:** The proposed compliance timelines of three years from state plan approval or five years from rule promulgation for existing sources, and 6 months after promulgation or upon startup for new sources, appear reasonable. These timeframes balance the need for expeditious emission reductions with the practical constraints of planning for and installing new control technologies. However, we recommend the EPA consider providing flexibility for individual sources to seek extended compliance deadlines based on site-specific technical or economic feasibility constraints, with appropriate justification and oversight.

3. Startup, Shutdown, and Malfunction (SSM) Provisions: LRAPA supports the EPA's proposal to remove exemptions for emission limit compliance during SSM events. This change will help ensure continuous emission reductions and create a more level playing field across the regulated community. We agree with the EPA's rationale that the MACT floor calculations already account for emissions variability, making separate SSM exemptions unnecessary.
4. Air Curtain Incinerators (ACIs): While the proposed amendments focus primarily on municipal waste combustion, we wish to highlight the challenges surrounding the use of ACIs for wildfire mitigation and forest management. As discussed in the attached email exchanges and narratives from interested stakeholders on ACI usage, current permitting requirements and costs create significant barriers for land management agencies and local organizations seeking to use ACIs as an alternative to open burning.

State nonprofit environmental justice organization, Beyond Toxics, describes to LRAPA several specific instances where rural Oregon communities have been negatively impacted by slash burning, including a resident in Florence who had to vacate to a hotel due to respiratory issues from a nearby burn, and a situation in Gold Beach where burning practices threatened both homes and a local stream. These stories illustrate the potential for ACIs to reduce the harmful effects of open burning when used properly.

LRAPA has also directly encountered these challenges in our work with the Southern Willamette Forest Collaborative (SWFC). In January 2023, SWFC inquired about using an ACI for a fuels reduction project within the city limits of Oakridge, Oregon to dispose of woody debris from forest mastication on Laurel Butte. However, after engaging with LRAPA and learning about the permitting costs and administrative requirements, SWFC determined that the ACI option was cost-prohibitive for their grant-funded project. Instead, SWFC paid the significantly lower Oregon Department of Forestry (ODF) slash burning fee, which is approximately 50 cents per acre, and burned the debris in the open.

While this decision was understandable given the financial constraints of the project, it resulted in the needless introduction of PM into the airshed in the middle of the city. This exposure could have potentially been avoided if rules for ACIs were less burdensome. The current regulatory structure effectively incentivizes open burning over the use of cleaner alternatives like ACIs, even when those alternatives could provide significant public health benefits by reducing PM emissions in populated areas.

This example highlights the unintended consequences of the current permitting requirements and fees for ACIs. By creating financial and administrative barriers to their use, the regulations may be contributing to increased public health risks from open burning, particularly in communities that are already vulnerable to air quality impacts. Streamlining the permitting process and reducing costs for ACIs used in wildfire mitigation and forest management could help level the playing field and encourage the use of cleaner disposal methods.

In addition to the specific recommendations outlined above, LRAPA also wishes to emphasize the potential benefits of biochar production as a byproduct of woody biomass utilization. As noted in the recent deliverables from the DEQ Biomass Utilization Work Group (BUWG), the use of ACIs can result in the creation of biochar, a carbon-rich material that can be used as a soil amendment, carbon sequestration tool, and filtration medium. By promoting the use of ACIs for wildfire mitigation and forest management, the EPA can not only help reduce the air quality impacts of open burning but also support the development of a market for biochar, which can provide additional environmental and economic benefits. LRAPA encourages the EPA to consider the potential for biochar production when evaluating the regulatory framework for ACIs and to work with stakeholders to identify opportunities to support the growth of this emerging industry.

The January 2024 ice storm in Springfield, Oregon, highlights another situation where more accessible ACIs could provide environmental and public health benefits. The storm left residents with large amounts of woody debris, prompting an emergency declaration issued by the City of Springfield and resulted in the LRAPA Board of Directors to temporarily modify outdoor burning rules to facilitate cleanup. While these changes offered some relief, they also underscored the limitations and air quality impacts of relying primarily on open burning for debris disposal. If ACIs were more readily available and affordable through streamlined permitting and reduced regulatory burdens, they could provide a cleaner alternative for managing storm debris and other excess woody materials generated by extreme weather events, helping communities respond more effectively without compromising public health.

These experiences demonstrate the need for the EPA to consider providing targeted flexibilities or streamlined permitting processes for ACIs used for wildfire mitigation and forest management. Potential options could include:

- a. Creating a general permit or permit-by-rule approach for ACIs that meet certain design and operating criteria, reducing administrative burdens while maintaining appropriate environmental safeguards.
- b. Providing clear guidance on the technical and economic feasibility criteria for exempting ACIs from Title V permitting requirements when used for wildfire mitigation and forest management.
- c. Encouraging states to develop streamlined permitting processes and reduced fee schedules for ACIs used for beneficial purposes, recognizing their potential to reduce overall emissions compared to open burning.

In addition to the specific comments above, LRAPA wishes to emphasize the importance of ongoing collaboration between the EPA, state and local agencies, regulated entities, and affected communities in implementing these amendments. Clear guidance, technical assistance, and adequate resources will be essential to achieving the desired emission reductions while minimizing unintended consequences.

Thank you again for the opportunity to comment on this important rulemaking. LRAPA looks forward to working with the EPA to implement these amended standards in a manner that protects public health, promotes environmental justice, and supports sustainable forest management practices.

Sincerely,

Susannah Sbragia
Interim Director
Lane Regional Air Protection Agency

Attachments:

Springfield_City_Request_for_Burning_Variance_LRAPA_Feb2024.pdf
Beyond Toxics email dated February 8, 2024
SWFC email thread dated January 23-24, 2023

February 8, 2024

SENT VIA EMAIL ONLY

Blake Hutchins
Thorp Purdy Jewett Urness & Wilkinson PC
1011 Harlow Rd Ste 300
Springfield OR 97477
bhutchins@thorp-purdy.com

Mr. Hutchins:

I am writing on behalf of the City of Springfield to ask you to forward this letter to the Lane Regional Air Pollution Agency (LRAPA) Board. The City is requesting LRAPA grant a waiver to its open burning regulations in two specific areas, as a result of the January 2024 ice storm: (1) extending the open season that normally begins on March 1 and lasts through June 15 (except on days where a red flag warning is in effect), to allow open burning to begin sooner, and (2) temporarily removing the prohibition on burning green wood for the duration of the City's declared state of emergency (currently through February 27 but may be extended by approval of the Springfield City Council). These waivers would be specific to debris generated by the January ice storm only.

The Springfield City Council and Lane County have declared a public state of emergency related to the multiple-day ice storm that began on January 12, 2024. The ice storm caused a significant amount of property damage across the City and Lane County. As explained in this letter, a waiver is in the public interest because it will help expedite the cleanup of debris generated by the storm.

The January ice storm caused an unprecedented level of damage to trees and shrubs, resulting in a significant amount of debris from public and private property, including downed limbs and fallen trees. For example, we estimate that over 20,000 City trees sustained some type of damage during the storm. There are not yet estimates of tree damage on private property, but it is known to be significant. In some neighborhoods, nearly every tree was affected.

As a result of the widespread tree damage, traditional debris disposal options are being strained. To date, Lane Forest Products estimates they have taken in approximately 400,000 yards of material generated by the storm at their sites in Eugene and Springfield, with most arriving at their facility in Springfield. Of this, Lane Forest Products hauled approximately 160,000 yards offsite for stockpiling because it exceeded what they could put into reuse in the local hog fuel market. Additionally, the City of Springfield opened a free storm debris dump site last weekend, Friday, February 2 through Sunday, February 4, for Springfield residents and property owners. More than 900 vehicle loads were disposed of at the City's debris site across those three days. The site will be open this upcoming weekend, February 9 through 11, as well.

While the City is taking steps to provide debris disposal options, there remains more debris on private property than the City or our public and private partners can likely accommodate in the next few months. A variance to allow open burning of green wood, and open burning before March 1, would provide another option for debris disposal for properties greater than one-half acre. If debris is not cleaned up, and remains on private property in the long term, it creates potential future hazards. These include potential fuels for uncontrolled fire events and debris that could impede access for fire and life safety services in the event of another minor or major emergency.

If LRAPA grants the waiver, the City will take steps to ensure the public is also informed about safe burning practices and mandatory setbacks from structures. The Eugene-Springfield Fire Department will also temporarily waive its \$25.00 open burning permit fee to help advance the City's goals of expediting debris removal.

My thanks to the LRAPA board for considering of this request.

Sincerely,



Kristina Kraaz
Assistant City Attorney
KSK:ljc

Travis Knudsen

From: Lisa Arkin <larkin@beyondtoxics.org>
Sent: Thursday, February 8, 2024 10:10 PM
To: Travis Knudsen; Susannah Sbragia
Cc: Jennifer Eisele; Arjorie Arberry-Baribeault
Subject: Air Curtain Incinerators- BT ideas for testimony

Hello Travis and Susannah,

Thank you for our productive meeting on January 31! I'm very glad we are having these discussions! I want to follow up on my promise to send you some ideas for testimony to the EPA on Air Curtain through their incinerator rules. I hope I am not sending this email too late! I believe the EPA docket for public comment on their incinerator rules is still open.

Here are thoughts and stories from Beyond Toxics regarding slash burning in Western Oregon. Please let me know what you think and if you wish to discuss this further.

Please confirm that LRAPA is submitting comments. I think the next step we discussed could be for the LRAPA Board to request an exemption to the ACI rules for Lane County. Travis, what would be the process to do so?

Anyway, I hope the section below is helpful!

Sincerely, Lisa

=====

Air Curtain stories:

Slash burning is a common timber practice in Oregon. Acres of forest slash piles covered in polyethylene plastic sheeting are lit with a petroleum based accelerant. The large piles can smoulder for days, creating lingering smoke and the risk of extended smoke inhalation for nearby rural residents. Polyethylene sheeting is the thick black plastic that is used to cover the top of a slash pile to keep an area of the pile dry to promote ignition. This plastic stays on the pile during the burn. Burning plastic releases organochlorine-based substances into the air. When such plastics are burned, harmful quantities of dioxins, a group of highly toxic chemicals, are emitted. Dioxins are identified as one of the most toxic substances to the humans. This is not only a problem for people, but it is a climate problem due to the uncontrolled release of carbon and other climate driving pollutants into the air in addition to the use of petroleum products as plastic covers and accelerants. A pollutant of concern during smoke events is carbon monoxide. Carbon monoxide levels are highest during the smoldering stages of a fire. Slash burns can smolder for days- the rules allow for 3-days of smoldering, but no one is out in the rural timber areas checking for compliance.

It is expected that rural residents can shelter inside their homes during slash burning season. The US EPA states that even sheltering at home is not a fully successful means of avoiding smoky air. It depends on how well a house limits smoke from coming in from outdoors. "For communities with older homes and without air conditioning, the US EPA states that indoor concentrations of fine particles can approach 70 to 100 percent of the outdoor levels." In very leaky homes and buildings, outdoor particles can easily infiltrate indoors, so that staying inside may offer little protection. It follows that, in poorer rural communities with older homes, sheltering indoors is not helpful, which may constitute inequities and greater health impacts.

1. Florence, Oregon

The house of a family living west of Hwy 101 near Clear Lake was situated between the lake and downwind from a large slash burn uphill from their home. The piles were very close to their home and were stretched out along the only road providing egress from their property. The woman had pre-existing health conditions, including asthma. After trying to shelter in place, the woman was having trouble breathing. She had to pack up her pets and find hotel lodging in town because she was unable to withstand the exposure to fine particulate and toxic pollutants. As I remember, her husband was out of town, so she had to deal with the situation on her own while feeling very sick and having trouble breathing. Previous to the start of setting the piles on fire, she had contacted the property owners to ask for relief from the plan to burn a hillside of slash piles immediately uphill from her home and only escape route. The owner refused to find alternatives or do the burn in smaller amounts over a period of time so that less smoke and less risk occurred.

2. Gold Beach, Oregon

A timber company logging on a hillside next door to a rural community illegally piled slash alongside and into the stream that separated the properties. Beyond Toxics was asked to come out to inspect the potential for code violations. After we filed a complaint to the Oregon Dept of Forestry, the timber operator had to move the slash piles out of the stream and further away from the residential area. Had we not been called and had we not traveled to Gold Beach to assist these residents, the slash burning would have taken place just yards from homes and the burned debris would have contaminated the stream.

=====

Lisa Arkin, Executive Director

Beyond Toxics

541-543-2465 (direct)

541-465-8860 (office)

2 offices:

120 Shelton McMurphey Blvd., Suite 280, Eugene, OR 97401

312 N. Main St., Suite B, Phoenix, OR 97535

larkin@beyondtoxics.org

“The eyes of the future are looking back at us, and they are praying for us to see beyond our own time.” Terry Tempest Williams

Travis Knudsen

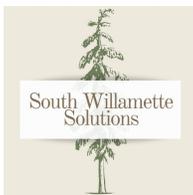
From: SWFC <director@swfcollaborative.org>
Sent: Tuesday, January 24, 2023 12:24 PM
To: Max Hueftle
Cc: Dustin Rymph - SWFC Staff; MILLER Margaret * DEQ; Travis Knudsen
Subject: Re: ACI permitting for Oakridge fuels reduction

Thanks Max,

Good to know. I wish I had known then what I know now, we would've commented as an organization. As a SSRA community, alternatives to open burning are critical.

Thanks for the info, I will run it up the chain and see what we get back from ODF!

Sarah Altemus-Pope
SWS Executive Director
SWFC Coordinator
Phone: 541-521-5786



On Tue, Jan 24, 2023 at 11:56 AM Max Hueftle <max@lrpa.org> wrote:

Hi Sarah,

LRAPA and DEQ received similar comments and requests on the fee issue as part of the public notice process for the ACI permit. See attached for the summary of comments and responses to the comments.

LRAPA does not have the ability to waive permit fees in our rules, and we do not have rule provisions that allow waiving of permitting requirements. DEQ has a provision in their rules [(OAR 340-216-8020(2))] for waiving fees due to financial hardship that LRAPA could potentially use, but I don't believe it has been used by DEQ - certainly not by LRAPA.

Max

Max Hueftle

Operations Manager

Lane Regional Air Protection Agency

1010 Main Street

Springfield OR 97477

O: 541-736-1056, ext 231

From: SWFC <director@swfcollaborative.org>

Sent: Tuesday, January 24, 2023 11:12 AM

To: Max Hueftle <max@lrpa.org>

Cc: Dustin Rymph - SWFC Staff <staff@swfcollaborative.org>; MILLER Margaret * DEQ <Margaret.MILLER@deq.oregon.gov>; Travis Knudsen <travis@LRAPA.ORG>

Subject: Re: ACI permitting for Oakridge fuels reduction

Hi Max,

Thanks for the quick turnaround with this info. These are pretty steep costs, especially when compared to ODF burn permits which are 50 cents an acre. Is there any way to get a grant or waiver for permitting? I can also ask ODF if we can help fund these permits, but in total the costs are equivalent to 2 days of work. I don't know if we can offer enough work to incentivise a contractor to get the permits.

I am CCing Margaret because she was interested in our process on using an ACI. Same with Travis, since we work so closely on the Oakridge Air work.

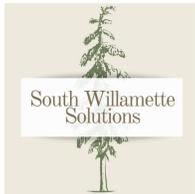
Thanks,

Sarah

Sarah Altemus-Pope
SWS Executive Director

SWFC Coordinator

Phone: 541-521-5786



On Mon, Jan 23, 2023 at 4:49 PM Max Hueftle <max@lrpa.org> wrote:

Hi Sarah,

The issued version of LRAPA's AQGP-031 for Air Curtain Incinerators (ACIs) is attached.

The application forms to be assigned to AQGP-031 are as follows:

- [AQGP-100](#) General ACDP Application
- [AQ230](#) Miscellaneous Process or Device (ACI)
- [AQ213](#) Power Supply Generators (Internal Combustion Engine)
- LUCS form and contacts (attached)

The fees to be assigned to AQGP-031 are currently as follows:

- \$1,861 Assignment to General ACDP
- \$1,117 Annual Fee (General – Fee Class One) for calendar year 2023, prorated based on date of application

- \$302 Annual fee for Cleaner Air Oregon (CAO), prorated based on date of application

Since the permit has already been issued and signed by the LRAPA Director, sources may be assigned to the permit (AQGP-031) relatively quickly and without public notice. Once we receive a complete application, including a LUCS signed by a city or county planning official, along with the permit fees, LRAPA can get a source assigned to the permit within 2 weeks or so.

Max

Max Hueftle, P.E., BCEE

LRAPA Operations Manager

Lane Regional Air Protection Agency

1010 Main Street

Springfield OR 97477

From: SWFC <director@swfcollaborative.org>

Sent: Monday, January 23, 2023 3:22 PM

To: Max Hueftle <max@lrapa.org>

Cc: Dustin Rymph - SWFC Staff <staff@swfcollaborative.org>

Subject: ACI permitting for Oakridge fuels reduction

Hi Max,

We are looking into options for fuels reduction for the ODF grants we are implementing near Oakridge. Last month I talked to Ryan Ramage with Valley Environmental about their operation. We are thinking this might be a good route for one of our projects. I know that they have been DEQ

permitted but we need a LRAPA permit for them to come here. What is that process and what will it cost?

The ODF projects must be completed by June 30th so having an ACI to assist provides a good alternative to meet the grant deliverables.

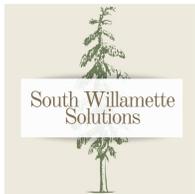
FYI I haven't told Ryan that we are seriously considering this option yet, I want to make sure we have the budget and enough time to line up permits before taking up too much of his time.

Thanks,
Sarah

Sarah Altemus-Pope
SWS Executive Director

SWFC Coordinator

Phone: 541-521-5786





**LANE REGIONAL AIR PROTECTION AGENCY
MEMORANDUM**

To: Howard Saxion, Chair, and LRAPA Board Members

From: Susannah Sbragia, Interim Director

Date: March 14, 2024

Subject: Scribner's Cleanup of Employee Handbook Version 2024

ISSUE STATEMENT

The board approved the updated employee handbook version 2024 on January 11, 2024. Reviewing the handbook after it was approved as there were Scribner errors that need to be corrected.

BACKGROUND INFORMATION

The 2024 version of the employee handbook was being reviewed and some typos were found as a result. LRAPA legal counsel was asked to do a full review of the handbook and found the corrections listed below. The corrections are mostly missing words for clarification, missing punctuation, and referencing a grievance procedure that is no longer in the handbook.

Employee handbook change log

Date by changes made on 3-4-2024,
by Blake Hutchins, Attorney
Thorp, Purdy, Jewett, Urness & Wilkinson, P.C.

List of changes:

- (1) Added Change Log, p58.
- (2) Sec. 1.2, p.1: Corrected typo.
- (3) Sec. 1.4, p.2: Added policy violation as basis for discipline or termination as general warning.
- (4) Sec. 2.3, p.4: Clarified "federal law" requires overtime exemption determination, p.4.
- (5) Sec. 2.4, p.4: Fixed typo.
- (6) & (7) Sec. 3.4 on p.6 and Sec. 4.5 on p.9: Removed discipline/termination warning as it is set forth in 1.4. However, the remaining discipline/termination reminders were for serious enough potential issues that leaving them in seemed clearer at this stage.
- (7) Sec. 7.4, p.17: Added period.
- (8) Sec. 13.2, p.38: Removed reference to grievance procedure because no such procedure is set forth in the current manual. This was dead end legacy text that should have been removed.

SUMMARY

The employee handbook has been fully reviewed and is updated. The handbook will be reviewed no less than every two years unless there are any changes to labor laws which will cause it to be updated sooner.

STAFF RECOMMENDATION

Staff recommends the Board of Directors approve LRAPA Employee Handbook version 2024 with changes.



Director’s Report for February 2024

Meeting Date: March 14, 2024
Department: Director’s Office
www.lrapa.org

Agenda Item No. 14
Staff Contact: Susannah Sbragia
541-736-1056 ext. 209

February 2024 AQI CHARTS AND STATS:

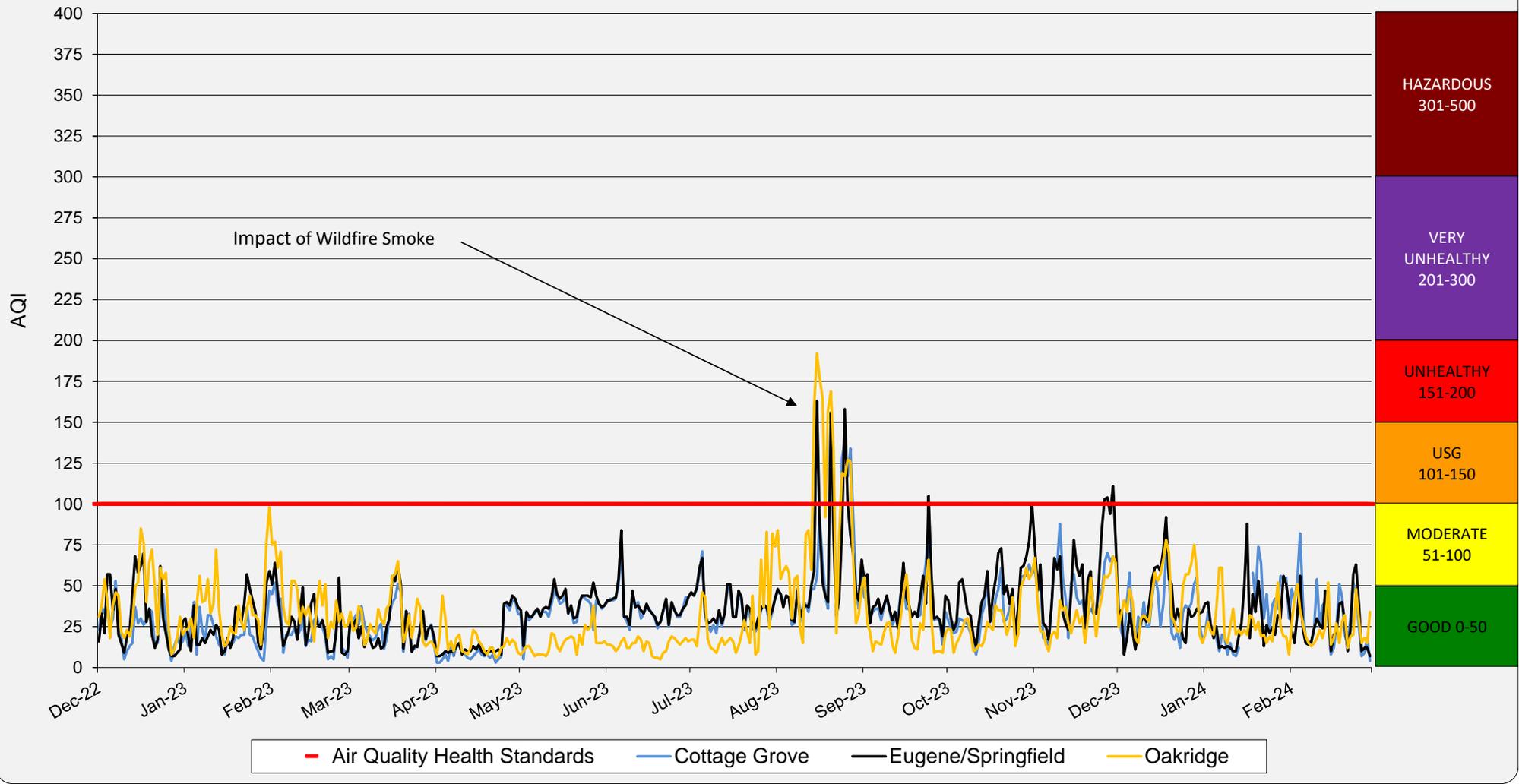
Site	Date	Max AQI	Pollutant
Eug/Spfld	24-Feb-24	63	PM
Oak	14-Feb-24	52	PM
CottGrv	4-Feb-24	82	PM

AQI	Eug/Spfld	Oak	CottGrv	AQI Range	PM2.5 Range, ug/m3
Good	26	27	24	0-50	0-12
Moderate	3	2	5	51-100	12.1-35.4
USG	0	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 (February 2024)
Attachment No. 2: PM2.5 index charts for Lane County (February 2024)

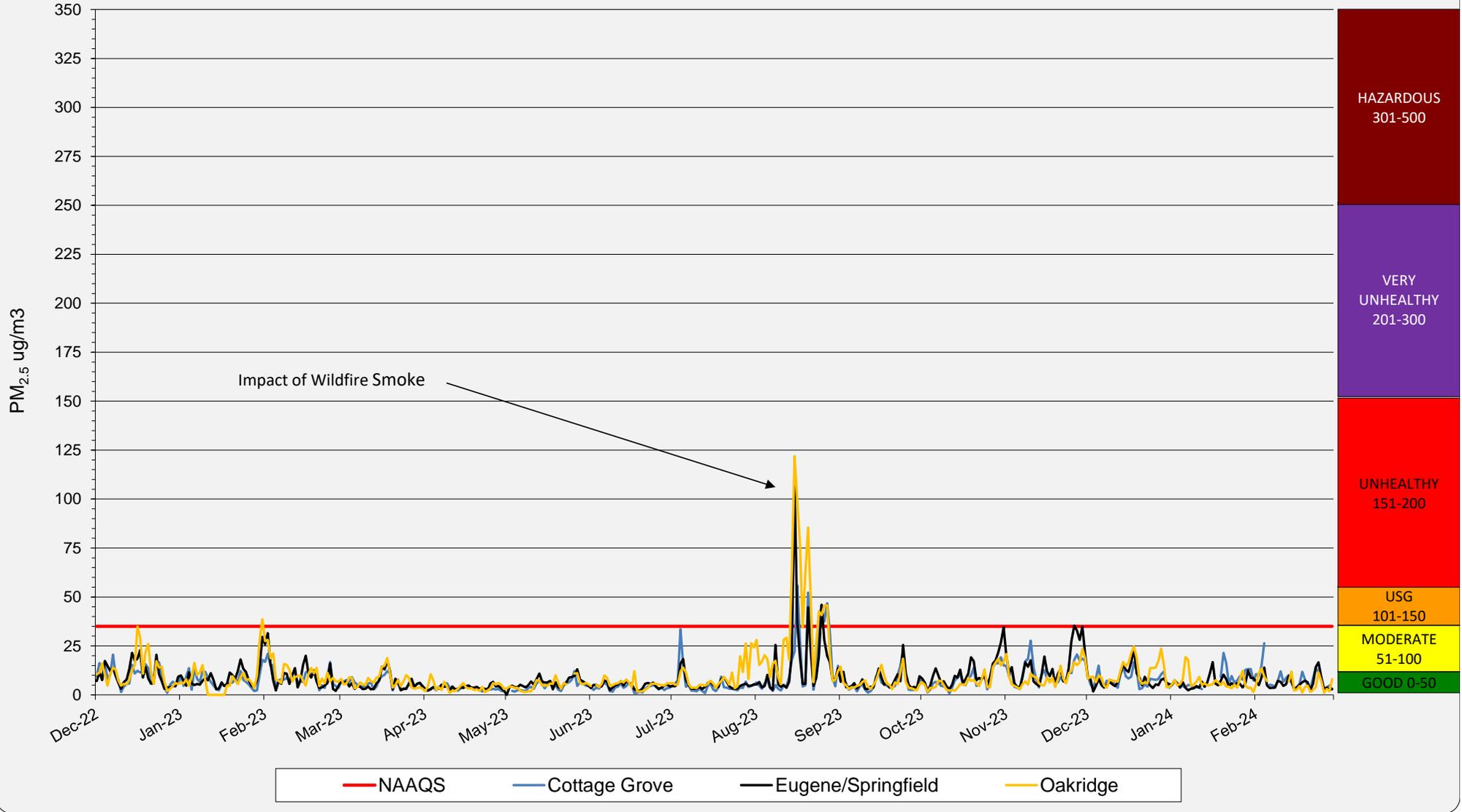
Daily Air Quality Index Chart

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

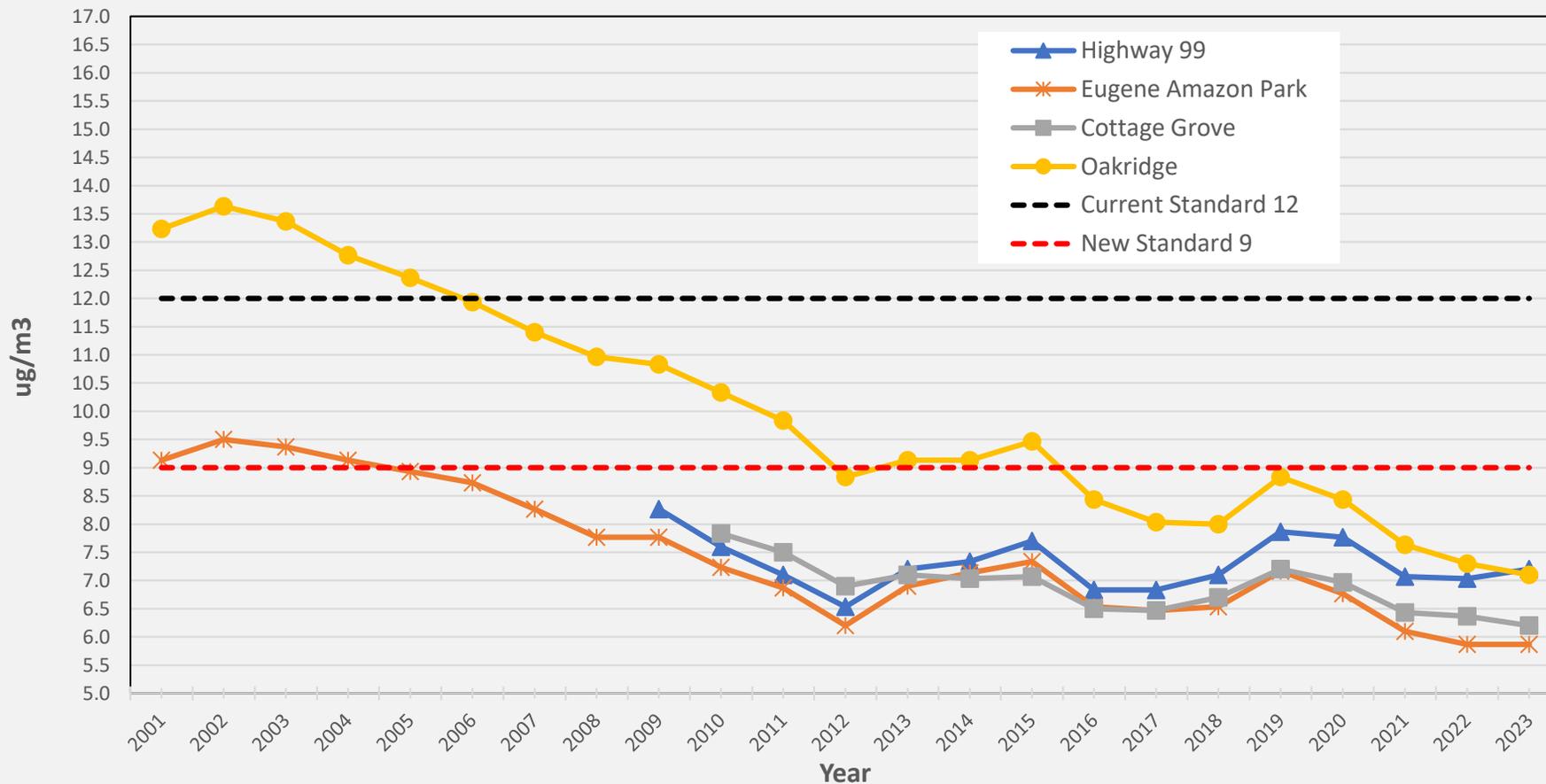


Daily PM2.5 Levels

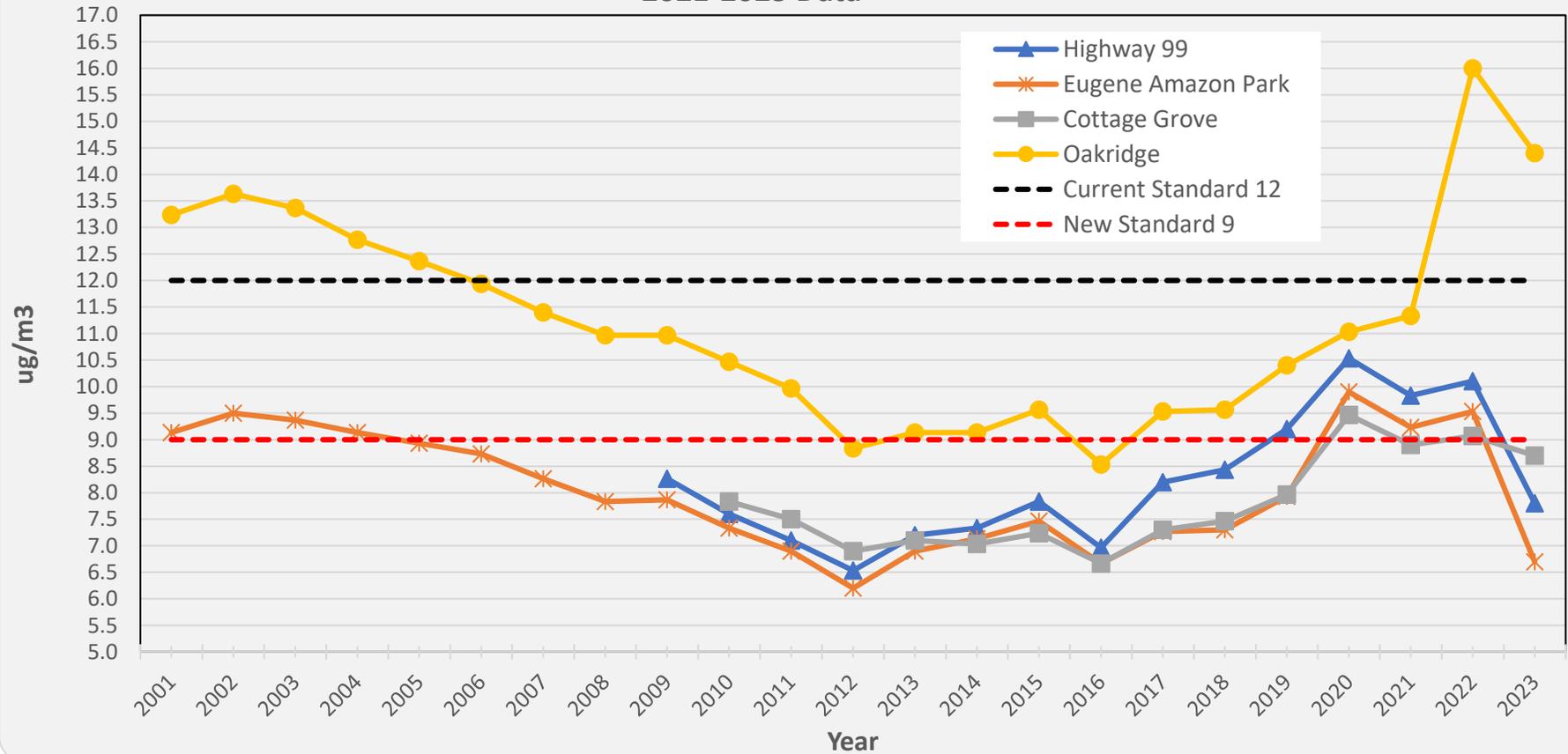
Daily Sampling, NAAQS Exceedance is Triggered on the 8th High



PM2.5 - Annual 3-Year Average (excludes wildfire data) 2021-2023 Data



PM2.5 - Annual 3-Year Average (includes wildfire data)
2021-2023 Data



COMPLAINTS RECEIVED: 2/1/2024 thru 2/29/2024:

Smoke complaints: 24
19 - Outdoor Burning
5 - Home Wood Heating
Industry: 8
4 - International Paper (4 under investigation)
3 - Swanson Group
1 - Unknown
Miscellaneous: 9
9 - Unknown
Total: 41

The calendar year 2024 compares to previous years:

Year	2019	2020	2021	2022	2023	*2024
Dust	15	17	26	12	7	0
Ag Burning / Spraying	6	2	7	2	3	0
General Air Quality	12	4	8	1	25	0
Home Wood Heating	128	74	57	67	52	14
Industry	170	100	336	198	97	13
Outdoor Burning	402	423	243	292	254	35
Slash Burning	16	12	10	6	12	0
Miscellaneous	67	59	40	102	72	1
Unknown	39	74	71	45	65	13
Total	855	765	798	725	587	76

* Year-To-Date

NEW/OPEN ENFORCEMENT ACTIONS STATUS REPORT
2/1/2024 to 2/29/2024

NEW: 2/01/2024 -- 2/29/2024: None.

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	0
Notices of Violation with Civil Penalties	37	26	17	24	15	0

* Year-To-Date.

ENFORCEMENT: 2/01/2024 to 2/29/2024

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

The complete enforcement report document is published on LRAPA’s Publication Reports and Factsheets [webpage](#).

OUTDOOR BURNING LETTER PERMITS: 2/01/2024 TO 2/29/2024

There were two Outdoor Burning Letter Permit (OBLP) issued in February 2024.

1. Issued Special Letter Permit 20B24-01-01 on February 15 to Coast Fork Willamette Watershed Council, 28 S 6th Street in Cottage Grove, to burn 80 cubic yards of miscellaneous woody yard type debris located at Tax Lot#: 1903230000602, Creswell, Oregon.
2. Issued Special Letter Permit 20B24-02-01 on February 21 to David Clark c/o Gary Rose, PO Box 213, Westlake, Oregon to burn 150 cubic yards of land clearing debris located at Tax Lot #1912342404000, Westlake, Oregon.

ASBESTOS

ABATEMENT: 2/01/2024 to 2/29/2024

During February, LRAPA received 40 notices of asbestos removal projects, one of which was a school (Fern Ridge Middle School, Elmira).

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	75
School Asbestos Abatement Notices (NESHAP)	16	25	20	16	17	1
Number of Asbestos Abatements Inspected	94	93	104	115	91	9

* 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	2	5		7
Renewals	2	16		18
Modifications		6		6
Constructions				
Registrations				
Terminated Permits				
Total Issued Permits Year-to-date	3	11		14

Permits placed on public notice:

Source Name	Reason for Public Notice	Type of Permit
None	None	None

Permit backlog:

Permit Type	Total Number of Permits by Type	Number of Permits Extended Administratively	Percentage of Total (%)
Title V	14	0	0%
Standard	26	3	12%
Simple	28	4	14%
Total	68	7	9%*

*Average percentage total

PUBLIC AFFAIRS, MONTHLY SUMMARY

- LRAPA has been engaged with local partners across Lane County in several regional collaborative groups and committees. March meetings or engagements included participation with the Lane Regional Climate Collaborative, Oakridge Area Fire Safe Council, Rivers to Ridges ecological burning workgroup, Lane County Healthy Housing Collaborative, Pollution Prevention Coalition, Community Wildfire Protection Plan/National Hazard Mitigation Plan workgroup, and the Biomass Utilization Work Group.
- LRAPA continues to engage collaboratively with residents, regulatory bodies, and government entities on soil remediation activities concerning J.H. Baxter, a closed wood preservation business in West Eugene.
- LRAPA committed to the Active Bethel Neighborhood Association to participate by hosting a booth at the association’s “We Are Bethel Celebration” at Petersen Barn on June 8 from 12 pm to 4 pm.
- LRAPA committed to South Willamette Solutions to participate in the Wildfire Safety Night in July. The exact date has yet to be determined, but LRAPA plans to participate in this public outreach event in Oakridge.

MEDIA INTEREST AND OUTREACH

Media	DATE	MEDIA	REPORTER	TOPIC
Contacts	2/9/2024	KEZI	Robert Desaulniers	Springfield Burning Variance
	2/25/2024	KEZI	Noah Chavez	Springfield Burning Variance
Press Releases	2-16-2024	LRAPA Board Approves Variance of Outdoor Burning rules for Springfield residents.		

AGENCY GOALS AND UPDATES:

- The new Finance Manager, Christina Ward, begins at LRAPA on March 18, 2024. Christina has a strong background in grant management and a communication style and approach that will fit well within the collaborative culture LRAPA fosters.

Goal: Update LRAPA Internal Policies and Procedures

- The all-staff meeting in March focused on internal policies and procedures. A collaborative exercise was initiated to solicit feedback from staff on needs and priorities. The next step will be to determine the timeline for completion of each policy and procedure and determine the top three policies and procedures.
- We are actively reviewing LRAPA's LINFO database to enhance its functionality for operation workflows for reporting and tracking. Our goal is to collaborate with LCOG to assess the budget necessary to be included in the 2024-25 fiscal year budget. The goal will be to have LINFO software systems fully completed by June 30, 2025.

Goal: Community Engagement and External Relationships

- LRAPA met with the Springfield City Manager Nany Newton and Legislative and Economic Development Analyst Sam Kelly-Quattrocchi to assess LRAPA and the City of Springfield's working relationship and identify opportunities for collaboration and resource leveraging.
- LRAPA met with the Oakridge City Administrator James Cleavenger, Finance Director Colleen Shirley, Chief of Police Kevin Martin, and Admin Sgt. Mikal McPherson to assess LRAPA and the City of Oakridge's working relationship and identify opportunities for collaboration and resource leveraging, as well as provide information related to the EPA's lowering of the NAAQS for PM2.5.
- To increase visibility for the needs of budget committee members, Howard Saxion the Board Chair has requested a temporary application process until the board can approve the application and any process changes at the April board meeting.
- At the Board Chair's direction, LRAPA published a [Budget Committee application](#) on LRAPA's website.

TENTATIVE UPCOMING LRAPA BOARD AGENDA ITEMS

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

April 2024

- Budget Committee Meeting
- Review & approve applications and process for budget members
- LRAPA Air Quality Permitting Rules Public Hearing
- QR 3 Financial Update
- Special section Executive Director Interviews & hire
- Congratulations on Kelly Conlon's retirement (4-30-24)

May 2024

- Budget Committee Meeting
- Approve FY25 Budget
- Oakridge Air Status Report
- Annual Report Review
- Dashboard Report
- Possible; Special section Executive Director Interviews & hire

June 2024

- Employee Recognition
- Review Board Goals by adding a type of scorecard
- Year-end overview of unaudited financials