



A G E N D A

LANE REGIONAL AIR PROTECTION AGENCY MONTHLY BOARD OF DIRECTORS MEETING

THURSDAY JULY 10, 2025

12:15 P.M.

Virtual Participation

Microsoft Teams

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Meeting ID: 240 733 233 033 8

Passcode: Us9rS9ft

In-Person Participation

LRAPA

1010 Main Street

Springfield, Oregon 97477

[Note: Start times for agenda items are approximate]

CALL TO ORDER:

- 1. Call to Order/Roll Call (12:15 p.m.)**
- 2. Adjustments to Agenda (12:15 p.m.)**
- 3. 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.)

- 4. 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.)*

- 5. Approval of Meeting Minutes (12:25 p.m.)**

Action

A. Heather Gravelle

B. June 12, 2025 Meeting Minutes

C. Board Discussion

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

Action

A. Kelly Wood

B. Report

C. Discussion

- 7. Approval of Financial Report (12:40 p.m.)** *Action*
- A. Christina Ward
 - B. May 2025 Financial Report
 - C. Resolution 25-03 Corrective Action Plan FY 24-25
 - D. Board Discussion
- 8. Federal Grant Status Update (12:50 p.m.)** *Information*
- A. Travis Knudsen & Christina Ward
 - B. Report
 - C. Board Discussion
- 9. Legislative Update (1:00 p.m.)** *Information*
- A. Travis Knudsen
 - B. Report
 - C. Board Discussion
- 10. Rulemaking Review (1:10 p.m.)** *Information*
- A. Travis Knudsen
 - B. Report
 - C. Board Discussion
- 11. Vehicle Inspection Programs in Oregon (1:20 p.m.)** *Information*
- A. Travis Knudsen & Lance Giles
 - B. Presentation
 - C. Board Discussion
- 12. PERS UAL Discussion (1:30 p.m.)** *Information*
- A. Travis Knudsen & Christina Ward
 - B. Report
 - C. Board Discussion
- 13. Executive Director's Performance Evaluation Process (1:40 p.m.)** *Information*
- A. Travis Knudsen & Rachelle Nicholas
 - B. Report
 - C. Board Discussion
- 14. Directors Report (1:50 p.m.)** *Information*
- A. Travis Knudsen
 - B. Report
 - C. Board Discussion
- 15. Adjournment (2:00 p.m.)**

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**BOARD OF DIRECTORS
MEETING MINUTES
JULY 10, 2025
MEETING VIA TEAMS / LRAPA OFFICE, SPRINGFIELD OREGON**

ATTENDANCE	
BOARD PRESENT:	STAFF PRESENT:
Howard Saxion, Chair	Travis Knudsen, Executive Director
David Loveall, Vice-Chair	Lance Giles, Technical Services Manager
Bryan Cutchen	Max Hueftle, Operations Manager
Jared Hensley	Rachelle Nicholas, Administrative Manager
Matt Keating	Matt Sorensen, Public Affairs and Project Manager
Michael Johnston	Colleen Wagstaff, Enforcement Manager
Dylan Plummer	Christina Ward, Finance Manager
Alan Stout	Heather Gravelle, Environmental Coordinator
	Marcia Miller, Permit Writer
	Jaime McEvoy, Environmental Coordinator
	Mandy Ramirez, Field Inspector / Compliance Officer
	Robbye Robinson, Finance Specialist
BOARD ABSENT/EXCUSED:	OTHERS PRESENT:
Jim Settlemeyer	Evelina Davidova-Kamis, Vice-Chair, Citizens Advisory Committee (CAC)
	Jim Daniels, CAC Member
	John Quetzalcoatl Murray, KPEW
AGENDA	ACTION
REGULAR MEETING	
1. Call to Order.	Chair Howard Saxion called the regular meeting to order at 12:15 p.m.
2. Adjustments to the Agenda.	None.
3. Public Participation.	
A. Comments on an Item on Today's Agenda.	None.
B. Comments on a Topic Not Included on Today's Agenda.	None.
4. Comments from Board Members.	Chair Saxion praised staff on the 2024 annual report and described it as excellent, well-designed, and comprehensive.

	Director Keating agreed and shared his appreciation for the agency building renovations and improvements and was pleased to be attending in person.
5. Approval of Meeting Minutes.	MOTION: Director Loveall moved, and Director Hensley seconded to approve the June 12, 2025 Meeting Minutes. The motion passed unanimously.
6. Citizens Advisory Committee.	Evelina Davidova-Kamis, Vice-Chair of the Citizens Advisory Committee (CAC), provided the Board with an overview of the June 24, 2025 CAC meeting.
7. Approval of Financial Report/Resolution 25-03 Corrective Action Plan FY 24-25.	Christina Ward, Finance Manager, presented the Board with the May 2025 financial report. MOTION: Director Loveall moved, and Director Cutchen seconded to approve the May 2025 Financial Report. The motion passed unanimously. Next, Ms. Ward referred to Resolution 25-03 and explained that it would adopt a corrective action plan to develop a Standard Operating Procedure (SOP) for financial database conversions that include verification of both trial balance amounts and subsidiary ledgers. She noted that she would draft the SOP for Executive Director approval by August 1, 2025. MOTION: Director Cutchen moved, and Director Keating seconded to approve Resolution 25-03 Corrective Action Plan FY 24-25. Director Stout suggested establishing a periodic review cycle for the SOP, recommending it be evaluated every ten years. The motion passed unanimously.
8. Federal Grant Status Update.	Travis Knudsen, Executive Director, and Ms. Ward provided the Board with a federal grant status update. The EJ Government-to-Government Grant was terminated by EPA despite having active terms, with the final report due July 20th. They are working to close out this grant to avoid jeopardizing the remaining \$2.7 million in targeted airshed grants. Additionally, a budget extension request has been submitted for the TAG 2 program. They also noted significant EPA staffing challenges, with the office reduced from 400 people to under 20 people.

9. Legislative Update.	Mr. Knudsen provided a legislative update and reported on key bills that passed: • SB 5520 (DEQ Budget): Passed with fee increases • GHG reporting fees for Title V facilities increased from 15% to 20% • ACDP GHG reporting fee increases from 7% to 20% with new \$500 minimum fee • Revenue increase projection for LRAPA from all GHG reporting fee increases: from \$71,000 to \$214,200 annually • SB 762: Landfill drone technology requirements (Benton County only, but Lane County landfill voluntarily applying) • HB 3729: Crematory temperature requirements reduced from 1800°F to 1600°F • HB 2332: Simplified air curtain incinerator permitting for wood waste
10. Rulemaking Review.	Mr. Knudsen shared upcoming rulemaking activities. The agency will be working on Title 15 to address enforcement procedures and civil penalties, aligning these with DEQ standards. They will also update Title 43 regarding asbestos requirements to improve clarity and readability. He explained the timeline for these efforts is aggressive but achievable, with drafts expected to be complete by the end of September. The public process will begin next spring, followed by final adoption next summer, representing a 12-month timeline overall.
11. Vehicle Inspection Programs in Oregon.	Lance Giles, Technical Services Manager and Mr. Knudsen provided a presentation regarding Vehicle Inspection Programs (VIP) in Oregon. Program Overview: Oregon's vehicle emissions testing program operates in Portland and Medford-Ashland metro areas, requiring biennial testing for registration renewal under federal Clean Air Act requirements. Federal Mandate: Areas not meeting National Ambient Air Quality Standards for carbon monoxide (CO) or ozone (O3) must implement Vehicle Inspection Programs as part of State Implementation Plans.

	Lane County History: Eugene-Springfield was designated a CO nonattainment area in 1978 but achieved redesignation in 1994 through traffic improvements and federal vehicle standards. Current Status: Portland and Medford maintain VIP requirements to preserve air quality status; Eugene-Springfield did not require vehicle inspections under its approved maintenance plan. Program Effectiveness: Portland's VIP achieved a 25% reduction in CO emissions during its first 12 years of operation. LRAPA Priorities: Current agency focus has shifted to smoke management, industrial permitting, air monitoring, and public outreach activities. Discussion followed.
12. PERS UAL Discussion.	Mr. Knudsen and Ms. Ward presented a report on PERS Unfunded Actuarial Liability (UAL) reserve considerations in response to Budget Committee concerns. He explained that while Governmental Accounting Standards Board (GASB) requires agencies to report their PERS unfunded liability share on financial statements, it does not require budgeting for the entire UAL amount. Peer agency research showed that most treat PERS as a standard payroll expense without separate UAL reserves. Staff explained there were options for Board consideration: maintain the current \$10,000 contingency, implement a graduated 5-year funding approach, or fully fund the \$374,655 UAL amount. In addition, staff recommended forming a Budget Subcommittee to examine reserve strategies and report back to the Board in September 2025. After discussion, the Board consensus was to create a separate Local Government Investment Pool (LGIP) account for "Board Designated Funds" reserved for future PERS UAL funding through a Board resolution; transfer \$374,655 (the entire current UAL amount) into this account in FY26 and establish a formal policy with a committed fund balance.
13. Executive Director's Performance Evaluation Process.	Mr. Knudsen noted a timing discrepancy between the Executive Director's annual performance review schedule (November) and the current contract expiration (May 2026). Staff recommended conducting the November 2025 review as scheduled and aligning future contracts with the November review cycle.

	Director Cutchen noted that the City of Oakridge times employee evaluations in the fall and contract renewals with the fiscal year, allowing adequate time for the evaluation process and enabling the Budget Committee to factor positive evaluations into budget planning. After deliberation, the Board reached consensus to continue with the current evaluation and contract renewal schedule.
14. Director's Report.	Mr. Knudsen provided a detailed review of the June 2025 Directors Report. Highlights include air quality and operations; key achievements; community engagement; program performance and July priorities.
15. Adjournment of LRAPA Board Meeting.	Chair Saxion adjourned the LRAPA Board meeting at 2:00 p.m.

(Minutes recorded by Heather Gravelle)



Prepared on 7/2/2025

Footnotes

General Fund	FY 23-24 YTD Actuals as of May 2024	FY 24-25 YTD Actuals as of May 2025	FY 24-25 Adopted Budget	FY 24-25 Budget Variance	FY 24-25 % of year elapsed (target %)
Revenues					
Federal & State Revenues	837,548	1,044,888	1,182,000	(137,113)	
Local Dues	231,693	203,500	203,500	0	
Permit Fees	1,250,609	1,404,090	1,336,592	67,498	
Other Revenues	88,829	211,445	54,900	156,545	
Transfers from Title V, Grant Fund, and AirMetrics	0	13,003	38,700	(25,697)	
Total Revenue Received	2,408,680	2,876,925	2,815,692	61,233	
Expenditures ^					
Personnel Services	1,638,817	1,629,528	1,967,600	83%	92%
Materials & Services	887,765	895,073	1,082,550	83%	92%
Capital Outlay	327,537	1,359,250	1,550,000	88%	92%
Contingency	0	0	30,000	0%	92%
Total Expenditures	2,854,118	3,883,851	4,630,150	84%	92%
General Fund Net	(445,438)	(1,006,926)	(1,814,458)		
Special Revenue (Title V)					
Revenues					
Permit Fees - Title V	640,970	805,369	775,300	30,070	
Total Revenue Received	640,970	805,369	775,300	30,070	
Expenditures ^					
Personnel Services	422,137	429,310	542,900	79%	92%
Materials & Services	14,384	8,607	12,200	71%	92%
Transfers to Gen Fund	0	0	38,700	0%	92%
Contingency	0	0	10,000	0%	92%
Total Expenditures	436,521	437,917	603,800	73%	92%
Special Revenue Net	204,450	367,453	171,500		
Grant Fund					
Revenues					
EPA TAG 1&2, and EJG2G	680,749	1,101,875	3,013,700	(1,911,800)	
Total Revenue Received	680,749	1,101,875	3,013,700	(1,911,800)	
Expenditures ^					
Personnel Services - All Grants	61,767	79,469	127,100	63%	92%
Materials & Services - All Grants	781,975	1,098,532	2,811,600	39%	92%
Capital Outlay - All Grants	20,054	24,946	0	>100%	92%
Transfers to Gen Fund - All Grants	0	13,003	0	>100%	92%
Contingency - All Grants	0	0	75,000	0%	92%
Total Expenditures	863,797	1,215,950	3,013,700	40%	92%
Grant Fund Net	(183,047)	(114,076)	(0)		
Total Expenditures - ALL FUNDS Consolidated	4,154,435	5,537,718	8,247,650	67%	92%
ALL FUNDS Net	(424,036)	(753,549)	(1,642,958)		
* % Spent is YTD Actuals divided by total FY Budget.: Red: 91% & above / Yellow: 81%-90% / Green: up to 80%					
**Column with % of Year Elapsed is Budget Variance % divided by time elapsed %: Red: 91% & above / Yellow: 81%-90% / Green: up to 80%					

Footnotes:

- The General Fund Capital Outlay expenses are currently at 88% of our budgeted spending for the fiscal year. However, this is to be expected as we have completed our remodel project. This line item will likely be spent in its entirety well before the end of the fiscal year. This has caused overall expenditures for the General Fund to total 84%, which is to be expected.
- In FY25 we did not budget for these line items, therefore the spending is over 100% due to this error. However, it will not cause the Grant Fund total expenditures to be over budget because we are extremely low in overall expenses within the Grant Fund.
- The All Funds Net line on this financial report represents the "Revenue - Expenses" amount. At the end of the fiscal year, if this amount is a positive amount, our reserves balance will be increased by this amount. If this amount is negative, we have dipped into our reserves for the year.

RESOLUTION #25-03

RESOLUTION ADOPTING CORRECTIVE ACTION PLAN FOR FY2023 - 24 AUDIT FINDINGS

WHEREAS Lane Regional Air Protection Agency's (LRAPA) auditors, Isler CPA, has issued the auditor's reports on the Annual Financial Report for the Year Ended June 30, 2024; and

WHEREAS the auditor issued a finding that LRAPA has a significant deficiency that is not considered to be material weakness of internal control over financial reporting.

WHEREAS it is required by the Oregon Secretary of State's Office to issue a Corrective Action Plan to address the finding within 30 days of the issuance of the auditor's report; and

WHEREAS LRAPA staff have prepared a Corrective Action Plan to address the finding.

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

Section 1. The LRAPA Board adopts the Corrective Action Plan for the audit findings for the Annual Financial Report for the Year Ended June 30, 2024, marked Exhibit A;

Section 2. This resolution is effective immediately upon its enactment by the Board.

PRESENTED AND PASSED this 10th day of July 2025.

Howard Saxion
Chairperson, LRAPA Board of Directors

Date

Travis Knudsen, Executive Director

Date

RESOLUTION #25-03

Exhibit A, Resolution No. 25-03

CORRECTIVE ACTION PLAN FOR FY 2023-24 AUDIT FINDINGS

There is one finding for FY24, the finding is listed below, including the adopted plan of action and timeframe.

1. Finding: 2024-001

- a. Material Weakness of internal control over financial reporting.**
- b. Criteria:** Internal controls should be designed and implemented to prevent or detect and correct potential material misstatements in amounts reported in the financial statements.
- c. Condition:** Following a conversion to a new accounting system, amounts were not reconciled to the ending balances in the preceding accounting system. In relation to this, it was also noted that subsidiary ledgers for accounts receivable and accounts payable did not agree, and had not been reconciled, to the balances reported on the trial balance.
- d. Cause:** Conversion of accounting systems is a time intensive and complex process. Procedures were not incorporated into that process to verify the integrity of the data migration.
- e. Effect:** Adjustments of \$191,057 were required to correctly state balances reported for Fiscal Year 2024.
- f. Auditor's Recommendation:** Processes and procedures should be put in place for any future system conversions to verify the integrity and accuracy of the data migration process. These procedures should include verifying both trial balance amounts and subsidiary ledgers.

2. Plan of action: LRAPA will develop a Standard Operating Procedure (SOP) for Financial Database Conversions. It will include verifying both trial balance amounts and subsidiary ledgers from the old database prior to importing data into the new database.

3. Timeframe for implementation: The SOP will be drafted by the Finance Manager and approved by the Executive Director on or before August 1, 2025.

Please note that there are no immediate plans for conversion to a new Financial Database Software, as the last conversion to Caselle was completed in July of 2023. Caselle is meeting LRAPA's current needs with great efficiency and accuracy. Re-evaluation of our Financial Database software for consideration of new software will only occur when and if our needs change.



LANE REGIONAL AIR PROTECTION AGENCY MEMORANDUM

To: Howard Saxion, Chair and LRAPA Board Members

From: Travis Knudsen, Executive Director

Date: July 10, 2025

Subject: Monthly Status Update - Federal Grant Programs – as of 6/30/2025

STAFF REPORT

ISSUE STATEMENT

This staff report provides the ongoing status update on LRAPA's federal grant programs as directed by the Board. The report includes financial information and progress updates for the Environmental Justice Government-to-Government (EJG2G) grant and Targeted Airshed Grants (TAG) supporting work in the Oakridge-Westfir area.

BACKGROUND INFORMATION

Following the Board's direction, LRAPA continues to administer federal grant programs provided that: (1) LRAPA maintains an active Terms and Conditions agreement for each grant, and (2) no more than 25% of any grant total is tied up in contractor payments or awaiting federal drawdowns.

FINANCIAL STATUS as of 6/30/2025

- **Targeted Airshed Grant 1.0** (November 2019 – November 2025)
 - Total grant amount: \$4,938,190
 - Spent to date: \$4,178,520.07
 - Remaining grant balance: \$759,669.93
 - Awaiting federal reimbursement (as of 6/4/25): \$0
 - Percentage of grant awaiting reimbursement: 0%
- **Targeted Airshed Grant TAG 2.0** (January 2022 – August 2026)
 - Total grant amount: \$2,739,425
 - Spent to date: \$397,795.90
 - Remaining grant balance: \$2,341,629.10
 - Awaiting federal reimbursement (as of 6/4/25): \$0
 - Percentage of grant awaiting reimbursement: 0%
- **EJG2G Grant – Terminated on 3/21/2025** (July 2024 – ~~June 2027~~ March 21, 2025)
 - Total grant amount: \$997,622
 - Spent to date: \$46,976.47
 - Remaining grant balance: \$0
 - Awaiting federal reimbursement (as of 6/4/25): \$11,426.54
 - Percentage of grant awaiting reimbursement: 1.1%
 - **IMPORTANT UPDATE** (March 21, 2025): The EJG2G grant has been officially terminated by the EPA. The deadline to close out the grant is 7/20/2025. The final reimbursement request will be made after the EPA reviews all closeout documentation.

STAFF RECOMMENDATION

This is an informational item, and no formal motion is required. Staff recommend that the Board review this monthly progress update and note the termination status of the EJG2G grant.



LANE REGIONAL AIR PROTECTION AGENCY MEMORANDUM

To: Howard Saxion, Chair and LRAPA Board Members

From: Travis Knudsen, Executive Director

Date: July 10, 2025

Subject: 2025-27 Biennium Legislative Update

STAFF REPORT

ISSUE STATEMENT

This staff report provides an update on key legislation from Oregon's 2025 legislative session that may potentially impact LRAPA's operations, funding, and regulatory responsibilities. Notable developments include the Oregon Department of Environmental Quality's (DEQ) budget approval with GHG reporting fee increases, new crematory temperature requirements, and drone monitoring initiatives at landfills.

BACKGROUND INFORMATION

LRAPA continues to monitor and engage with legislative activities that affect air quality protection in Lane County. The 2025 legislative session has produced several bills with possible implications for LRAPA's programs and the sources we regulate. Additionally, administrative rulemaking processes continue to shape Oregon's regulatory landscape.

LEGISLATIVE UPDATES AND IMPACTS

1. SB 5520 - DEQ Budget and GHG Reporting Fee Increases

SB 5520 is Oregon's 2025-27 biennial budget bill for DEQ. It was passed by both chambers and signed by Gov. Kotek on June 24, 2025, taking effect immediately as an emergency measure on July 1, 2025. The bill allocates nearly \$966.4 million, including \$85.3 million in general funds, and gives DEQ authority to increase GHG reporting fees under Policy Option Package 111 to support unbudgeted program costs.

POP 111 represents a revenue increase to DEQ of \$950,000 in the 2025-27 biennium.

- Title V facilities: GHG fees increased to 20% of annual fees (up from 15%)
- ACDP facilities: GHG fees increased to 20% of annual fees (up from 7%)
- Minimum fee: \$500 (previously no minimum)
- Fee cap: \$9,000 (doubled from \$4,500)

LRAPA's analysis of these changes estimates that if LRAPA were to apply similar adjustments to the Agency's ACDP fee structure, annual GHG reporting fee revenue would increase from approximately \$71,000 to \$121,000.

2. SB 726 - Landfill Drone Monitoring and Short Mountain Leadership

SB 726 requires Coffin Butte Landfill in Benton County to begin using "satellite, aircraft, drone or remote direct monitoring technologies" for methane detection, starting January 1, 2027. It was narrowed in scope from an initial statewide proposal to focus on Coffin Butte due to opposition and political compromise.

While Lane County's Short Mountain Landfill isn't mandated, it is voluntarily deploying the drone-based methane monitoring subject to this legislation. This will be the first use of this technology for regulatory purposes in Oregon.



LRAPA has facilitated discussions between Short Mountain Landfill, DEQ, and Sniffer Robotics (the drone monitoring company hired by the landfill) to address DEQ's technical questions and ensure the monitoring approach meets regulatory needs. This positions Lane County as a leader in advanced landfill monitoring technology and may serve as a model for future statewide implementation.

3. HB 3729 - Crematory Temperature Requirements

HB 3729 modifies Oregon's crematory regulations by reducing the required incineration temperature from 1,800°F to 1,600°F. The bill was introduced in response to stakeholder input that the higher temperature standard was outdated, imposed unnecessary fuel costs, and was out of alignment with national best practices. Oregon was the last state maintaining a statutory 1,800°F threshold, despite evidence that 1,600°F ensures complete and effective cremation.

The bill passed the House (55–0) on May 21, 2025, and the Senate (30–0) on May 29, 2025. It was signed into law by Governor Kotek on June 15, 2025, and takes effect August 28, 2025.

Seven Lane County crematories permitted under LRAPA's General ACDP and one under a Basic ACDP (eight total) are affected by this change. LRAPA will issue a No Penalty Justification (NPJ) to clarify enforcement discretion during the transition. The new temperature standard is expected to reduce operational costs while preserving environmental compliance and public health protection.

4. HB 2332 - Air Curtain Incinerator Exemptions

HB 2332 was signed into law on June 10, 2025 and exempts certain air curtain incinerators (ACIs) from Title V Operating Permit requirements if they:

- Burn only wood waste, clean lumber, or yard waste.
- Are not otherwise required to obtain a Title V permit under federal requirements.

This regulatory streamlining reduces burden on using these units for clean biomass disposal while maintaining federal compliance standards.

5. PFAS Regulation Development

While comprehensive PFAS legislation (HB 3512) did not advance from committee, DEQ has proposed rulemaking to designate six PFAS substances as hazardous, with a public comment period in spring 2025, and an Environmental Quality Commission decision expected in September 2025. LRAPA will continue to follow for any potential future air monitoring or stationary source permitting requirements related to PFAS.

STAFF RECOMMENDATION

This is an informational item, and no formal action is required. Staff recommend that the Board:

- Consider aligning LRAPA's GHG reporting fee structure with DEQ's increases for state-wide regulatory consistency.
- Support continued engagement with Short Mountain Landfill on drone monitoring implementation.
- Continue monitoring legislative activities and administrative rulemaking that may impact LRAPA operations.

Staff will remain engaged with DEQ and coordinate with state legislators to advocate for adequate funding and practical regulations that protect air quality while supporting Lane County businesses and residents.



LANE REGIONAL AIR PROTECTION AGENCY MEMORANDUM

To: Chair Howard Saxion, and LRAPA Board Members

From: Travis Knudsen, Executive Director

Date: July 10, 2025

Subject: Upcoming LRAPA Rulemakings

STAFF REPORT

ISSUE STATEMENT

LRAPA staff are preparing updates to five administrative rule titles to modernize enforcement procedures, streamline asbestos regulations, update permit requirements, and ensure consistency with state regulations. This report provides the Board with a high-level overview of the proposed changes and anticipated timeline for these rulemaking efforts.

BACKGROUND INFORMATION

LRAPA's administrative rules require periodic updates to maintain alignment with evolving state and federal regulations, address operational inefficiencies, and improve clarity for both staff and the regulated community. Through ongoing review and coordination with the Oregon Department of Environmental Quality (DEQ), the Agency has identified necessary amendments to five titles that form the foundation of LRAPA's regulatory framework.

The last comprehensive updates to these titles occurred several years ago, and changes in regulatory practices, enforcement procedures, and program requirements necessitate these revisions. The proposed amendments will enhance LRAPA's ability to protect air quality in Lane County while providing clearer guidance to businesses and the public.

OVERVIEW OF PROPOSED CHANGES

Title 15: Enforcement Procedure and Civil Penalties

Updates will align LRAPA's enforcement procedures with DEQ rules, clarify authorities, and streamline the progression from warnings to penalties. This creates a more consistent and legally defensible enforcement framework.

Title 43: Asbestos Requirements

A reorganization will evolve this complex title into logical sections (surveys, work practices, disposal) with modernized definitions and clarified exemptions. The result will be a more user-friendly rule that better protects public health.



OVERVIEW OF FUTURE RULE CHANGES IN OTHER RULEMAKING(S)

Title 12 - General Provisions and Definitions: This involves cleanup and clarification.

Title 30 - Incinerator Regulations: This would revise the crematory secondary chamber temperature from 1800F to 1600F with an option to repeal and use DEQ's division 230 in its entirety.

Title 32 - Emission Standards: This involves cleanup and clarification.

Title 37 - Air Contaminant Discharge Permits (ACDP): This involves cleanup and clarification; Would change GDF General ACDP Fee Class 5 to 4; Would add a new Basic category to match DEQ's A.8 category; and Update fees to more closely match DEQ's CAO fee increases.

Title 39 - Contingency for PM₁₀ Sources in Eugene-Springfield Non-Attainment Area: This involves a repeal of a set of contingency measures that would have been used if the area had not met attainment by December 31, 1994.

Title 44 - Hazardous Air Pollutant Program: This would update delegation of federal standards to the 2025 Code of Federal Regulations (CFR); Possibly incorporate DEQ's new GDF rules; and Option to repeal and use DEQ's corresponding rules in division 244.

Title 46 - New Source Performance Standards: This would update delegation of federal standards to the 2025 Code of Federal Regulations (CFR); and Option to repeal and use DEQ's corresponding rules in division 238.

Title 50 - Ambient Air Standards and PSD Increments: This would update the annual PM_{2.5} standard from 12 to 9.0 micrograms per cubic meter. States/locals must submit Infrastructure State Implementation Plans (SIPs) to the EPA within 3 years of EPA issuing a new or revised NAAQS. Therefore, the LRAPA PM_{2.5} Infrastructure SIP submission is due by February 7, 2027, because the reconsideration of the PM_{2.5} NAAQS was promulgated on February 7, 2024.

RULEMAKING TIMELINE

LRAPA plans to follow the tentative timeline for Titles 15 and 43, with the process beginning June 2025, and concluding with filing adopted rules by August 2026. Key milestones include:

- **Draft Development** (June – Sep. 2025): Complete rule drafts with legal review
- **CAC Review** (Oct. – Dec. 2025): Present to Citizens Advisory Committee for input
- **Agency Review** (Jan. 2026 – March 2026): DEQ review for stringency and approvability
- **Public Process** (April – June 2026): Public notice, comment period, and hearing
- **Final Adoption** (July – August 2026): Board approval and filing with Secretary of State

The rulemaking process will include direct public outreach and engagement through LRAPA's communication channels, a formal public comment period, and a public hearing before final Board consideration. Timelines for remaining title listed in this report have not yet been established.



GOING FORWARD

These rule updates represent an effort to modernize and improve LRAPA's regulatory framework. The changes are designed to:

- Enhance clarity and usability for the regulated community.
- Improve consistency with state regulations.
- Streamline administrative processes.
- Strengthen legal defensibility.
- Better protect public health and air quality.

Staff will continue coordinating with DEQ and EPA throughout the process to ensure the amended rules meet all requirements for approval and implementation. The rulemaking efforts will be managed using existing staff resources, with no additional budget impacts identified at this time.

STAFF RECOMMENDATION

This is an informational item, and no formal action is requested of the Board at this time. Staff welcome any feedback or guidance from the Board regarding these rulemaking efforts and will provide regular updates as the process progresses.



LANE REGIONAL AIR PROTECTION AGENCY MEMORANDUM

To: Howard Saxion, Chair and LRAPA Board Members

From: Travis Knudsen, Executive Director

Date: June 12, 2025

Subject: Oregon PERS Unfunded Actuarial Liability Reserve Considerations

STAFF REPORT

ISSUE STATEMENT

LRAPA's Budget Committee has raised concerns about the adequacy of current PERS contingency reserves. With only \$10,000 budgeted against a calculated UAL share of \$374,655, questions have emerged about whether the agency should adopt a more conservative reserve strategy.

BACKGROUND INFORMATION

Oregon's PERS system carries \$28 billion in unfunded liability statewide. While LRAPA's share is relatively small, rising contribution rates and potential volatility warrant careful consideration. Current employer contribution rates average 27% of payroll across Oregon.

A key distinction lies in understanding financial reporting versus budgeting. In 2014, the Governmental Accounting Standards Board (GASB) issued Statement No. 68, which changed how public agencies report pension obligations. This accounting rule requires agencies to show their proportionate share of PERS unfunded liabilities on their annual financial statements, as a line item on the balance sheet. This essentially makes the "invisible" pension debt visible to the public.

However, it is not a requirement to include future UAL related expenses in current year budgets. GASB 68 does not change how agencies actually budget for pensions. For budget purposes, agencies continue to pay only their required PERS contributions as billed, not the entire unfunded liability. This is similar to a mortgage: a homeowner receives reports of the full loan balance on financial statements but only needs to budget for monthly payments. This fundamental difference between accounting disclosure and cash budgeting underlies the current debate.

The risk of LRAPA having any additional UAL funding due to PERS during fiscal year 2026 remains small. Oregon rules require immediate payment only upon employer dissolution, PERS withdrawal, or failure to meet obligations. Historical patterns show struggling agencies merge rather than dissolve.

PEER AGENCY COMPARISON

Research by similar Oregon agencies (under 50 employees) shows most treat PERS as a standard payroll expense without separate UAL reserves. Small fire districts, water districts, and special districts with comparable staffing levels (2-40 employees) and payrolls (\$1-5 million) typically include PERS contributions as percentage-of-payroll line items in their budgets. These agencies budget using the actual PERS contribution rates provided by the state rather than creating separate reserves for their proportionate share of system-wide UAL.

LRAPA's current practice of maintaining a \$10,000 PERS contingency aligns with its peers, though reserve levels are modest compared to some agencies that have begun building stabilization funds in response to rate volatility.



ANALYSIS OF OPTIONS

Option 1: Status Quo

Maintain \$10,000 contingency. Consistent with peer practices but potentially inadequate for rate volatility. However, for FY26 & 27, Agency rates are already set and will not change again until FY28. The current rate is reflected in the board adopted FY26 budget.

Option 2: Graduated Funding Approach through an LGIP Account

Create a separate account at LGIP for “Board Designated Funds” and the board will designate those funds as reserved for future PERS UAL funding through adoption of a resolution. Transfer reserves to this account at the following pace: \$74,931 in FY26, FY27, FY28, FY29, and FY30. At the end of this 5 year time period the entire current PERS UAL amount (\$374,655) will be reserved and board designated. Create formal policy and committed fund balance.

Option 3: Full UAL Funding through an LGIP Account

Create a separate account at LGIP for “Board Designated Funds” and the board will designate those funds as reserved for future PERS UAL funding through adoption of a resolution. Transfer reserves of \$374,655 into this account in FY26, this amount represents the entire current PERS UAL amount and will be reserved and board designated. Create formal policy and committed fund balance.

RECOMMENDED APPROACH

Staff recommend Option 3. This balances fiscal prudence with operational needs. It also gives LRAPA’s board the flexibility to modify the designation of these reserves should there be a financial need to use the funds for other expenditures, which keeps our reserves at a healthy balance with no impact on operational needs.

BOARD OPTIONS

1. Direct staff to implement a proposed option listed above, or alternative approach, for establishing a PERS UAL reserve account. Because this is not an expense and is simply a transfer of funds between accounts, there is no need to reflect this in the LRAPA budget.
2. Form a Budget Subcommittee to examine PERS UAL reserve strategies at an August 2025 work session and report back to the Board in September 2025.
3. Take no action and maintain current practices.

STAFF RECOMMENDATION

The Board may consider forming a Budget Subcommittee to examine reserve strategies comprehensively and report findings at the September Board meeting. This allows thorough analysis while respecting the complexity of the issue. Once a decision is made, staff will draft the appropriate resolution to be reviewed and adopted by the board at the meeting following the board’s decision.



**LANE REGIONAL AIR PROTECTION AGENCY
MEMORANDUM**

To: Chair Howard Saxion, and LRAPA Board Members

From: Travis Knudsen, Executive Director

Rachelle Nicholas, Administrative Manager

Date: July 10, 2025

Subject: Director Performance Review Cycle and Contract Term Alignment

STAFF REPORT

ISSUE STATEMENT

This report addresses a timing discrepancy between the Executive Director's annual performance review cycle and the current employment contract term. The Director's employment contract establishes a November annual review cycle based on the completion of the probationary period, while the contract itself expires in May 2026. This creates a six-month gap between the final scheduled annual review and contract expiration that requires Board direction to ensure a clear and orderly process.

BACKGROUND INFORMATION

The Executive Director was appointed in May 2024 and successfully completed the six-month probationary period in November 2024. Per the Director's employment contract:

- Section 4 states that the Board shall review the Director's performance "no later than the end of the Probationary Period and annually thereafter," establishing a November review cycle
- Section 3.b extends the contract term to May 10, 2026, upon successful completion of probation
- Section 3.e requires LRAPA to provide "no less than sixty (60) days advance written notice of its intent to not seek renewal"

This structure creates the following timeline:

- November 2024: Probationary review completed (successfully)
- November 2025: First annual performance review
- March 2026: Latest date for notice of non-renewal (60 days before contract expiration)
- May 2026: Current contract expires



The timing discrepancy was identified during a review of contract provisions and has been discussed with LRAPA's legal counsel, who confirmed that alignment can be achieved through mutual agreement between the Board and the Director.

GOING FORWARD

To address this timing issue and establish clarity for both current and future contract cycles, staff recommend the Board consider the following approach:

For the Current Contract Term (through May 2026):

1. Conduct the scheduled annual performance review in November 2025 as specified in the contract
2. Use this November 2025 review to inform any decisions regarding contract renewal
3. If renewal is desired, begin renewal discussions following the November review to meet the March 2026 notice deadline

For Future Contract Terms (beginning May 2026):

1. Align future contract terms with the established November review cycle
2. Structure the next contract to run from May 2026 to November 2027 (18 months), then shift to November-to-November terms thereafter
3. This alignment would ensure performance reviews directly precede contract renewal decisions

Recommended Performance Review Process:

Based on the successful probationary review process, staff recommend the following approach for annual reviews:

1. The Administrative Manager solicits feedback from Board members:
 - Standardized evaluation form
 - Individual phone conversations
 - Written feedback via email
2. Staff feedback through 360-degree evaluation:
 - Anonymous survey distributed to all staff
 - Focus areas include leadership effectiveness, culture, communication, decision-making and support for departmental operations
 - Optional follow-up interviews with direct reports for more detailed input
3. Feedback is compiled into a comprehensive summary report
4. The Board discusses the performance evaluation in an executive session
5. The Board Chair communicates the results to the Director
6. Written documentation is maintained in the Director's personnel file



STAFF RECOMMENDATION

This is an informational item presented for Board discussion and to establish general consensus on direction. Staff seeks Board guidance on:

1. Confirmation of the proposed approach for managing the current contract term through May 2026
2. Direction on aligning future contract terms with the November performance review cycle
3. Approval of the recommended performance review process

No formal action is required at this time. Following Board discussion and consensus, staff will implement the agreed-upon approach and coordinate with legal counsel as needed for any future contract amendments.



Director's Report for June 2025

Meeting Date: July 10, 2025
Department: Director's Office
lrapa-or.gov

Agenda Item No. 14
Staff Contact: Travis Knudsen
541-736-1056 ext. 217

I. EXECUTIVE HIGHLIGHTS

Key accomplishments, challenges, and priorities from the past month.

June marked progress across multiple fronts for the Agency, with air quality remaining predominantly in the "Good" category throughout Lane County. Our monitoring stations recorded 83 days of good air quality out of 90 total days across all sites.

However, Eugene experienced a smoke intrusion on June 18th when a 50-acre agricultural burn near Junction City generated 22 complaints and elevated PM_{2.5} readings up to an Air Quality Index of 111 at Amazon Park (39.7 µg/m³). This incident highlighted ongoing jurisdictional complexities with agricultural burning regulations and prompted productive discussions with the Oregon Department of Agriculture (ODA) about enforcement coordination. As well as future engagement between ODA, LRAPA and the Oregon Department of Environmental Quality (DEQ) on agricultural smoke management.

LRAPA also received 26 air quality complaints of pulp odor, which are suspected to be connected to annual dredging operations at International Paper.

The Agency achieved a major milestone with the re-launch of the Supplemental Environmental Project (SEP) program at the end of June. This initiative garnered broad media coverage across multiple television stations and radio outlets, enhancing public awareness of environmental compliance alternatives. The program provides violators opportunities to invest in community-benefiting environmental projects as an alternative to traditional penalties.

Our organizational capacity reached 95% with the successful recruitment of Jaime McEvoy as Environmental Coordinator II, bringing 19 years of relevant experience from the City of Eugene. Additionally, we completed the transition to LINFO 3.0, our upgraded database system, which enhances permit tracking and complaint management capabilities.

Partnership building remained strong with productive engagements including hosting the Rivers to Ridges (R2R) ecological burn group and strengthening our collaboration with the National Weather Service Portland office. These relationships will prove invaluable during the upcoming wildfire season. Additionally, on June 30th, LRAPA issued outdoor burning letter permits to the R2R partnership, covering 1,456 acres across 85 units in Lane County for ecological burning.

Looking ahead, we're preparing for increased wildfire smoke risks while maintaining our focus on protecting public health through education, monitoring, and regulatory guidance. The strong air quality performance this month provides a solid foundation as we enter the fire-prone summer season.

II. PROTECTING PUBLIC HEALTH & SERVING OUR COMMUNITY

Aligns with Customer/Stakeholder Perspective of the Balanced Scorecard framework and LRAPA's current goals 1, 2, and 5 which focus on public health protection, community engagement, and stakeholder relationships.

II.A. Air Quality Status & Trends for June 2025

*These metrics support **Goal 1 (Public Health Protection and Air Quality Education)** and **Goal 4 (Regional Air Monitoring and Analysis)**, tracking our performance against targets for "Good" and "Moderate" AQI days, data completeness, and timely reporting).*

June 2025

Site	Date	Max AQI	Pollutant
Eug/Spfld	24-Jun-25	62	PM
Oak	24-Jun-25	47	PM
CottGrv	30-Jun-25	67	PM

AQI	Eug/Spfld	Oak	CottGrv	AQI Range	PM2.5 Range, ug/m3	Ozone Range, ppb
Good	26	30	27	0-50	0-9	0-54
Moderate	4	0	3	51-100	9.1-35.4	55-70
USG	0	0	0	101-150	35.5-55.4	71-85
Unhealthy	0	0	0	151-200	55.5-125.4	86-105
Very Unhealthy	0	0	0	201-300	125.5-225.4	106-200
Hazardous	0	0	0	301+	225.5+	201+

Attachment No. 1: Air Quality Index (AQI) charts for Lane County (June 2025)

Attachment No. 2: PM2.5 index charts for Lane County (June 2025)

II.B. Community Response & Complaint Resolution

*This section supports **Goal 1 (Public Health Protection and Air Quality Education)** metrics for complaint response to demonstrates our commitment to addressing community concerns promptly and effectively.*

The number of unique complainants is noted in "(#)"

June 1, 2025, to June 30, 2025										
Smoke complaints: 48				Category	2020	2021	2022	2023	2024	2025
22 - Field Burning (22)				Dust	17	26	12	7	8	3
20 - Outdoor Burning (18)				Ag Burning / Spraying	2	7	2	3	3	22
3 - Home Wood Heating (1)				General Air Quality	4	8	1	25	32	18
3 - Recreational Fire (3)				Home Wood Heating	74	57	67	52	39	35
Industry: 28				Industry	100	336	198	97	75	68
26 - International Paper (24)				Outdoor Burning	423	243	292	254	253	153
1 - Thabet Management/76 Gas Station				Slash Burning	12	10	6	12	9	1
1 – Pacific Recycling				Asbestos	15	9	22	10	12	15
Asbestos: 2				Miscellaneous	44	31	80	62	91	43
				Unknown	74	71	45	65	79	56
Miscellaneous: 11				Total:	765	798	725	587	601	414
7 - Unknown Odor (4)										
2 - Fugitive Dust (2)										
2 - Sewage Odor (2)										
Total: 89										

*Notes: LRAPA received more complaints in June compared to May, increasing from 58 to 89. This is due to the fact that the 2025 data is only for June 1st to June 30th.

*Notes: LRAPA received more complaints in June compared to May, increasing from 58 to 89. This included a rise in International Paper complaints (from 3 to 26) and 22 field burning complaints.

II.C. Smoke Management & Wildfire Resilience

This section aligns with **Goal 2 (Enhanced Wildfire Smoke Preparedness)**, tracking our smoke monitoring, advisory issuance, and coordination with state agencies, as well as smoke management activities for outdoor burning and home wood heating.

Outdoor Burning, 2024-2025 Season

LRAPA regulates outdoor burning in Lane County to protect air quality and public health. Under Title 47, LRAPA has authority to regulate open burning practices, including determining when burns can occur. LRAPA aims to allow burning whenever possible while preventing air quality deterioration. Outdoor burning is only curtailed when monitoring or forecasts show potential for unhealthy air quality impacts.

Periods of Curtailment				
Start	End	Areas	Curtailment	Reason
November 1, 2024	March 1, 2025	Eugene/Springfield UGB; Oakridge	Full Prohibition	By Rule, Title 47-015(2)
November 28, 2024	December 6, 2024	Coastal Lane County	Full Prohibition	Air Stagnation
November 28, 2024	December 6, 2024	Rural Lane County	Full Prohibition	Air Stagnation
January 8, 2025	January 8, 2025	Coastal Lane County	Full Prohibition	Air Stagnation
January 8, 2025	January 9, 2025	Rural Lane County	Full Prohibition	Air Stagnation

Home Wood Heating, 2024-2025 Season

LRAPA regulates home wood heating under Title 16 to reduce PM2.5 emissions during periods of poor air quality. An advisory system (Yellow/Red Days) indicates when curtailment is needed. Yellow Day advisory request voluntary curtailment of wood burning except for those who depend on it as their primary heat source. Red Day advisories prohibit visible smoke from chimneys, with exemptions for economic hardship. Like outdoor burning, LRAPA only issues wood burning curtailment when air quality monitoring or forecasts indicate potential health impacts.

Periods of Curtailment		
Areas	Yellow Days	Red Days
Eugene/Springfield	15	1
Oakridge	9	2

For April 2025, no additional advisories were issued beyond those previously reported as air quality conditions remained favorable throughout the month.

Outdoor Burning Letter Permits, 2024-2025 Season

LRAPA has authority to issue outdoor burning letter permits under Title 47. These permits allow specified burning that would otherwise be prohibited. This program also supports ecological benefits of prescribed fire while protecting public health through strict oversight and timing. LRAPA coordinates closely with land managers to ensure burns are conducted with minimal air quality impacts.

Permit No.	Issue Date	Permittee	Location	Material	Volume
20B24-11-01	November 7, 2024	Mohawk High School - Jeff Little	308300 Wendling Road, Marcola	Miscellaneous debris	10 cubic yards
20B24-11-02	November 15, 2024	Thompson Timber Co	Territorial Road, Junction City	One time burn of forest slash debris	707 cubic yards
20B25-02-01	February 3, 2025	Creswell Church of the Nazarene	805 S Front Street, Creswell	Miscellaneous debris	42 cubic yards

Permit No.	Issue Date	Permittee	Location	Material	Volume
20B25-02-02	February 20, 2025	McKenzie River Trust, c/o Brent Ross	Willamette Confluence burn Unit, Goshen	Land Clearing debris	50 cubic yards
20B25-02-03	March 10, 2025	Leisure Excavating – Gary Rose	Greengate Road - T19 R12 514, Dune City	Lane Clearing debris	130 cubic yards
20B25-04-01	April 28, 2025	Emerald Coalition	18707 Pataha Rd., Walton	Ceremonial Bonfire – clean dry wood debris	4 cubic yards
20B25-04-02	April 30, 2025	Schuyler Brown	Hwy 58 & Brabham Rd., Pleasant Hill	Ice storm cleanup of tree limbs and branches	10 cubic yards
20B25-05-01	May 8, 2025	Patrick Cartwright for Malk LLC	Cottage Grove Industrial Park, Cottage Grove	Lane Clearing debris	10 cubic yards
20B25-06-01	June 30, 2025	River to Ridges Partnership	85 units in Lane County	Ecological Burning	1456 acres

Wildfire Smoke Intrusions & Air Quality Advisories

LRAPA participates in Oregon's Wildfire Response Protocol for Severe Smoke Episodes, a coordinated system that connects federal, state, and local agencies during significant smoke events. LRAPA's role includes issuing local air quality advisories, coordinating public health messaging, and representing Lane County's interests in state-level response planning.

Air Quality Advisories Issued			
Start Date	End Date	Areas Affected	Primary Pollutant
07-08-2024	07-09-2024	Southern Willamette Valley	Ozone
07-26-2024	08-12-2024	Eastern Lane County	PM2.5
09-09-2024	09-11-2024	Eastern Lane County	PM2.5
01-27-2025	01-29-2025	Eastern Lane County	PM2.5/Woodstoves

Oregon Wildfire Response Protocol for Severe Smoke Episodes Meetings		
Date	Topic	Advisory Issued
07-19-2024	Coffee Pot & Ore Wildfires	Yes
07-22-2024	Coffee Pot & Ore Wildfires	Yes
07-26-2024	Coffee Pot & SW Oregon Wildfires	Yes
07-31-2024	Middle Fork Complex	Yes
08-02-2024	Middle Fork Complex	Yes
08-07-2024	Middle Fork Complex	Yes
08-09-2024	Battle Mountain Complex	Yes
08-12-2024	Battle Mountain Complex	No
08-14-2024	Battle Mountain Complex	No
08-16-2024	Battle Mountain Complex	No
08-19-2024	Battle Mountain Complex	No
08-30-2024	Willamette Complex South	No
09-04-2024	SE Oregon Wildfires	No
09-06-2024	SE Oregon Wildfires	Yes
09-09-2024	SE Oregon Wildfires	Yes
09-11-2024	SE Oregon Wildfires	Yes

Oregon Wildfire Response Protocol for Severe Smoke Episodes Meetings		
Date	Topic	Advisory Issued
09-13-2024	SE Oregon Wildfires	No
01-07-2025	Agency Smoke Coordination Review	n/a
01-08-2025	Agency Smoke Coordination Review	n/a

II.D. Community Outreach, Education, & Building Partnerships

This section supports **Goal 5 (Partnerships and Interagency Coordination)** metrics for partner engagement and stakeholder communication, strengthening relationships with stakeholders and enhancing public understanding of air quality issues.

Media Log			
Date	Media	Person	Topic
1/23/2025	KLCC	Rachael McDonald	Air stagnation and wood burning advisories
1/23/2025	KEZI	Ryan Bonham	Air stagnation and cleaner woodstove burning
1/28/2025	KEZI	Ryan Bonham	Air Quality Advisory E. Lane County and Red Advisory for Oakridge, Yellow EUG/Spring
2/28/2025	KEZI	Robert Desaulniers	Spring Outdoor Burning Season Opens and Tips on Safe Burning
2/28/2025	KMTR	News Staff	Spring Outdoor Burning Season Opens and Tips on Safe Burning
4/03/2025	Washington Post	Joshua Partlow and Amudalat Ajasa	EPA cutting more than \$1 Billion in EJ grant funds and impact on Lane County and other areas
4/24/2025	Lookout Eugene-Springfield	Ashli Blow	American Lung Association rates Eug./Spring 4 th worst air quality in US.
6/02/2025	KMTR	News Staff	End backyard burning June 7 th due to fire concerns
6/03/2025	Lookout Eugene-Springfield	Ashli Blow	Burn Ban to begin early in Lane County
6/17/2025	KXCR- Radio	Larry Bloomfield	30-minute live interview for Florence public radio that featured LRAPA to discuss Homewood heating, asbestos, and prepping for wildfire
6/20/2025	KMTR	Gold Meadows	50-acre agricultural fire in Junction City on Wednesday 6/18 and impacts on Eugene area causing poor air quality. LINK
6/30/25	KEZI	News Staff	Supplemental Environmental Project Re-launch LINK
6/30/25	KVAL	News Staff	Supplemental Environmental Project Re-Launch LINK
6/30/25	KMTR	Gold Meadows	Supplemental Environmental Project Re-Launch LINK
7/1/25	KCST 106.9 FM, KCFM 1250 AM, 104.1 FM & 103.1 FM	George Henry	Supplemental Environmental Project Re-Launch LINK
7/2/25	KLCC	Karen Richards	Supplemental Environmental Project Re-Launch LINK

Visit Portland National Weather Service (NWS) (June 13th, Portland office)

Travis Knudsen, Executive Director and Matt Sorensen, Public Affairs Manager were hosted by Tanja Fransen Meteorologist-in-Charge (Director), Treena Jensen the Warning Coordination Meteorologist, and Colby Neuman the Science and Operations Officer at the National Weather Service Portland office. During the visit we learned more about the scope of NWS activities and deepened our partnership. The NWS team offered additional guidance during wildfire season and to provide spot forecasts for prescribed burning activities in Lane County in the fall.



(L to R) Colby, Matt, Mr. Chicken the Portland NWS Mascot, Travis, and Treena at NWS.

30-Minute LRAPA Radio Interview Feature on KXCR Florence Radio (June 17th, Florence Public Radio)

Matt Sorensen was interviewed by Larry Bloomfield at KXCR Florence Public Radio for a 30-minute feature on LRAPA. Topics covered included best practices for home wood heating, asbestos rules and testing requirements, and making sure you have a HEPA air purifier for the upcoming wildfire season.

Supplemental Environmental Project (SEP) Program Re-Launch (June 27th, Email)

On Friday LRAPA re-launched the Supplemental Environmental Project (SEP) program by sharing details with our email list. Details for submitting an application and guidance for the SEP program are now live on the LRAPA website. On Monday June 30th a press release was issued and picked up by three television stations (KEZI, KVAL, KMTR).

Rivers to Ridges (R2R) Ecological Burn Group (July 2nd, LRAPA Office)

Matt Sorensen help host the Rivers to Ridges ecological burn group led by Bryce Izlar from Willamalane and Sara Worl with the Long Tom Watershed Council to continue their preparation for the 2025 prescribed burn season with LRAPA under the River to Ridges (R2R) banner. The meeting was hosted at LRAPA's boardroom as part of our community outreach efforts.

III. MAINTAINING REGULATORY EXCELLENCE

Aligns with Internal Process Perspective of the Balanced Scorecard framework and LRAPA's current goals 3 and 4—ensuring compliance with air quality standards through effective monitoring, permitting, and enforcement.

III.A. Stationary Source Permitting Progress & Efficiency

This section supports Goal 3 (Public Health Protection and Air Quality Education) metrics for permit issuance timeliness, permit backlog rate, and area NAAQS compliance.

Permitted Sources

- Currently 15 sources hold a Title V operating permit in Lane County.
- Currently approximately 275 sources hold an ACDP.

Permits in Queue			
Category of Permit Activity	Title V	ACDP	Total In Queue
New	1	2	3
Renewals	1	15	16
Modifications	2	5	7
Constructions	-	1	1
Terminated Permits	-	1	1

Stationary Sources Permits Issued, Year-to-Date

- Title V Operating Permits: 2
- Air Contaminant Discharge Permits: 15

Permits on public notice from June 1 to June 30, 2025		
Source Name	Reason for Public Notice	Type of Permit
Emerald People's Utility District - Short Mountain Generation Facility	Initial Title V Operating Permit	Title V Operating Permit. Off public notice 6/24/25.

Permit Backlog as of June 30, 2025			
Permit Type	Permits by Type	Permits Extended Administratively	Percentage of Total (%)
Title V	15	0	0%
Standard	24	4	14%
Simple	27	1	4%
Total	66	5	7%

III.B. Asbestos Program Oversight

This section supports Goal 3 (Public Health Protection and Air Quality Education) initiatives related to operating the asbestos program, including inspections and rule updates. LRAPA protects public health from asbestos hazards through effective oversight and education.

LRAPA administers the asbestos program in Lane County under title 43. This program regulates the handling, removal, and disposal of asbestos-containing materials to prevent public exposure to this hazardous substance. LRAPA reviews asbestos survey reports, processes abatement notifications, conducts inspections, and enforces compliance with asbestos regulations to protect workers and the public.

Asbestos Notices		Year-to-Date↓				
Year	2020	2021	2022	2023	2024	2025
Total Asbestos Abatement Notices	439	408	465	466	436	216

III.C. Enforcement

This section supports **Goal 3 (Public Health Protection and Air Quality Education)** metrics for enforcement action resolution and evaluations completed. The enforcement program ensures that regulations are followed, and violations are addressed.

LRAPA's compliance program ensures that air quality regulations are followed by stationary sources, asbestos contractors, and the general public. This section provides an overview of enforcement actions taken during the reporting period, including notices of non-compliance, civil penalties, and case resolutions.

June 1, 2025 to June 30, 2025					
Category of Violation	New	Follow-Up Action	Pending	Closed	Total
Asbestos	-	2	1	-	3
Industrial	-	1	1	-	2
Outdoor Burning	2	1	2	1	6
Fugitive Dust	-	-	-	-	-
Home Wood Heating	-	-	-	-	-
Totals	2	4	4	1	11

Attachment No. 3: June 2025, Enforcement Actions Detail Report.

	2020	2021	2022	2023	2024	2025
Notices of Non-compliance and Warnings	15	21	24	19	9	15
Notices of Violation with Civil Penalties	26	17	24	15	5	11

IV. STRENGTHENING ORGANIZATIONAL CAPACITY

Aligns with Learning & Growth Perspective of the Balanced Scorecard framework and LRAPA's current goal 6—developing staff capabilities and improving operational systems.

IV.A. Staff Development & Agency Growth

This section supports Goal 6 (Organizational Excellence and Operational Efficiency) metrics focused on staff retention, professional development, and employee satisfaction, essential for achieving operational excellence.

LRAPA maintains a skilled workforce to carry out our mission of protecting air quality in Lane County. This section provides an overview of our current staffing levels, vacancies, and professional development activities. Our commitment to staff development ensures we have the expertise needed to address complex air quality challenges effectively.

Department	FTE	Vacancies
Administration	5.0	0.0
Operations	9.0	1.0
Finance	3.0	0.0
Technical services	2.0	0.0
Total	19.0	1.0
<i>Agency at 95% of staffing capacity</i>		

Following a highly competitive recruitment process that attracted over 20 qualified candidates, LRAPA has successfully filled our Environmental Coordinator II position. We are pleased to announce that Jaime McEvoy has accepted the position and will begin on Monday, June 30th. Ms. McEvoy brings 19 years of experience in plan review with Building & Permit Services at the City of Eugene, providing her with deep knowledge of environmental regulations and planning processes. She holds an educational background in Landscape Architecture and Geography from the University of Oregon and previously served as a Volunteer Coordinator for the City of Eugene's Stream Team demonstrating her commitment to environmental stewardship and community engagement. Her experience and passion for environmental work align well with LRAPA's mission, and we anticipate she will be a valuable addition to our team.

Staff Professional Development, Year-to-Date			
Training	Participation	Completion Date	Provider
Budget Law Training	2	February	Oregon Department of Revenue
Avoiding Communication Pitfalls	1	February	Express
Basic Inspector Training	3	March	WESTAR
Accounts Receivable: Common Routines	1	March	Caselle
Fred Pryor Customer Service Training	1	April	Pryor Learning
Intro to Environmental Enforcement training	2	April	Western States Project
Essential Skills Workshop	1	April	Springfield Chamber: Work ready
Community Connect Portal	1	April	Caselle

Staff Professional Development, Year-to-Date			
Training	Participation	Completion Date	Provider
Workplace Safety: Active Violence Incident	17	May	City of Springfield, Police
New Source Review Process Steps	5	May	Department of Environmental Quality
Incinerators	3	May	WESTAR
Industrial Boilers	5	May	WESTAR
Electrostatic Precipitators	3	May	WESTAR
Ask Us Anything Air Quality	5	May	Department of Environmental Quality
Balancing Payroll Transmittals	1	May	Caselle
Complying with Grants	2	May	Environmental Protection Agency
ASAP Grant Payment Portal training	1	May	US Treasury
Payment Requests in ASAP	1	May	US Treasury
PERS Summer Webinar: Understanding your statement, voluntary contributions and Q&A	1	June	Employer Service Center (ESC)
Caselle: Payroll-Supplemental & Termination checks	1	June	Caselle
Caselle: New Online Payment Portal Management	3	June	Caselle
Ask Us Anything Air Quality	5	June	Department of Environmental Quality

Ask Us Anything Air Quality (June 11th and June 25th, Virtual)

Department of Environmental Quality (DEQ) training covers a range of various topics related to air quality, permitting, inspections and rulemaking.

PERS Summer Webinar: Understanding your statement, voluntary contributions and Q&A (June 25th, Virtual)

Finance staff attended a one-hour PERS Summer webinar that covered two topics:

- Understanding your EDX statement, invoices, and the current Contribution Rates table.
- How Individual Account Program (IAP) voluntary contributions work and how (and when) to deduct them from employees' pay.

Caselle: Payroll-Supplemental & Termination checks (June 26th, Virtual)

Trainers from Caselle, which is LRAPA's financial management software database, provided a deep dive into how to complete supplemental and termination payroll checks that are processed outside of our regular payroll

processes.

Caselle: New Online Portal Payment Management (June 26th, Virtual)

The Finance team attended a training for the new online payment portal system for customers to use beginning 7/1/25. LRAPA will be transitioning from Xpress Bill Pay to the new Caselle payment portal for FY2026. The training included managing the portal as an administrator and helping customers make payments online.

IV.B. Operational Improvements & Innovation

*This section supports **Goal 6 (Organizational Excellence and Operational Efficiency)** metrics for technology adoption and systems modernization, enhancing our efficiency and effectiveness in serving Lane County.*

LRAPA is working to improve our systems and processes to enhance efficiency and effectiveness. These improvements support our ability to fulfill our mission and provide better service to the public. Current initiatives focus on technology upgrades, document management, and standardized procedures.

Current activities underway:

- **LINFO Database Upgrade:** LRAPA transitioned to our central database system (LINFO) version 3.0 on June 11, 2025. This upgrade enhances our permit tracking, complaint management, and reporting capabilities. Core reports are now functional in the new system. We are entering the stabilization phase, during which staff will identify and resolve any remaining bugs through daily use. While the system underwent pre-launch testing, we anticipate adjustments may be needed as we fully integrate the new version into our operations.
- **Meeting Technology:** Refinement of hybrid meeting capabilities in the boardroom to improve accessibility for board meetings, staff training, and stakeholder engagement continues. Despite adjustments to both physical equipment placement and Zoom settings, audio challenges persist. We have identified the issue as likely software-related within the Zoom platform. As a solution, we will pilot Microsoft Teams for the June board meeting. If Teams provides reliable audio quality without the current issues, we will consider transitioning to this platform for all future hybrid meetings to ensure consistent, high-quality communication for all participants.
- **Standard Operating Procedures (SOPs):** Development and review of SOPs is ongoing for key agency functions. These procedures ensure consistency in operations, facilitate staff cross-training, and support succession planning.

The work on development of SOPs is continuing across the organization. Several policies have been published while others are undergoing internal review and will be rolled out in July.

V. ENSURING FISCAL RESPONSIBILITY

Aligns with Financial Stewardship Perspective of goal 7—managing financial resources effectively and transparently.

V.A. Budget Performance & Stability

*This section supports **Goal 7 (Financial Sustainability and Transparency)** metrics for budget variance and maintaining adequate reserves (4 months of operating budget), ensuring LRAPA can fulfill its mission consistently.*

Please refer to the May 2025 financial update (Agenda item number 7).

Line Items to Watch Closely: These line items are above 90% of the expected budgeted spending to date. For example, if 75% of the year has elapsed, anything above 68% will be listed.

- **General Fund Capital Outlay** expenditures currently total 88% of budgeted spending and is aligned with expectations as we have completed our remodel project. This has also caused our General Fund total expenditures to 84% of the budgeted spending. We remain on track to be below budget for the General Fund by the end of the fiscal year.
- **Special Fund (Title V) Materials & Services** – no items to report
- **Grant Fund Capital Outlay and Transfers to General Fund** line items were not delineated in the FY25 Adopted Budget, therefore it appears that these line items are “over budget” on the financials, however, both line items are well within the expected amounts. The expenditures for the Grant Fund are currently at 40% of budgeted spending, therefore the error on these two line items within the Adopted Budget is of little to no consequence budgetarily speaking.

Summary of Expenditures to Date: Although **92%** of the year has elapsed **as of 6/30/25**, spending is currently below that threshold in each of the LRAPA funds. These are the categories we must consider when asking the question “Were we below or over budget for the year?”:

- **General Fund** Total Actual Expenditures as a % of Budgeted Annual Expenditures: **84%**
- **Special Revenue Fund** Total Actual Expenditures as a % of Budgeted Annual Expenditures: **73%**
- **Grant Fund Total** Actual Expenditures as a % of Budgeted Annual Expenditures: **40%**
- **All Funds Consolidated** Actual Expenditures as a % of Budgeted Annual Expenditures: **67%**

V.B. Financial Transparency & Reporting

*This section supports **Goal 7 (Financial Sustainability and Transparency)** metrics for financial reports provided to the Board (target: monthly) and timely audit completion (target: before December 31). Transparency in financial matters builds trust with our stakeholders and ensures accountability.*

Fiscal Year: 2024-2025	Status	Completion Date
Budget	Adopted	June 2024
Prior Year Audit - FY24	Completed	July 2025

Fiscal Year: 2025-2026	Status	Completion Date
Budget	Adopted	May 2025
Prior Year Audit - FY25	To be scheduled	Expected December 2025

VI. BOARD CALENDAR

A tentative review of upcoming initiatives, events, and board business.

2025	2026
January - Preview upcoming appointments on board and committees. - Oakridge Air update - Remodel update January; Work Session - Discussion of Partner Dues - Discussion of Board Goals - Discussion of Board Meeting Schedule February - Supplemental Budget for FY'25 - Appoint new Budget Committee members, and appoint Budget Officer - Elect the Board Chair and Vice Chair - Board Goals Review - Federal Grant Status Update - Remodel Update March - Budget Committee Meeting for FY'26 - Authorization for Public Comment on SB 5520 - Board Goals Approval - Federal Grant Status Update - Remodel Final Update April - Budget Committee Meeting for FY'26; Approve Budget - Annual By Rule Fee Schedule - Public Comment SB 5520; Report May - Public Hearing of FY'26 Approved Budget, Board Adoption - Oakridge Air Update - Federal Grants Status Update - LRAPA Open House June - Audit Presentation from Isler CPA—FY24 - Outdoor Burning Season Review - Federal Grants Status Update - The Permit Life Cycle: Application to Compliance July - Rulemaking Review - Federal Grants Status Update - Executive Director's Performance Evaluation Process - PERS UAL Discussion, Review & Investment Strategy - Ozone Review - Audit Report August - PERS UAL Workgroup September - Review Legislative Session and state general fund decisions. - Review Local Partner Dues Calculation for FY'27. - Wildfire Smoke Management Season Update - FY'24 Audit, Corrective Action Plan - FY'26 Budget Reflection October - Approve Local Dues Calculation for FY'27. - Wildfire Smoke Management Season Update/Review - Outdoor Burning Season Update November - Audit Update, FY'25 - Home Wood Heating Season Update - Executive Session: Director Performance Evaluation December - No Meeting	January - Preview upcoming appointments on board and committees. - Oakridge Air update - Review budget forecast for FY'2026-2029 February - Supplemental Budget for FY'26 - FY'25 Audit Report & Presentation - Appoint new Budget Committee members, and appoint Budget Officer - Elect the Board Chair and Vice-Chair March - Budget Committee Meeting for FY'26 April - Budget Committee Meeting for FY'27; Approve Budget - Executive Director's Performance Evaluation Process May - Public Hearing of FY'27 Approved Budget; Board Adoption - Executive Session: Director Performance Evaluation - Oakridge Air Update June - Outdoor Burning Season Review July - Rulemaking Review - Review PERS UAL Liability & Investment Strategy August - No Meeting September - Review Legislative Short Session. - Review Local Partner Dues Calculation for FY'28. - Wildfire Smoke Management Season Update October - Approve Local Dues Calculation for FY'28. - Wildfire Smoke Management Season Update/Review - Outdoor Burning Season Update November - Audit Update, FY'27 - Home Wood Heating Season Update December - No Meeting

VII. LRAPA STRATEGIC GOALS REFERENCE SHEET

These ongoing and sustained goals are designed to ensure comprehensive performance management across four key perspectives. This reference sheet provides an overview of each strategic goal and its associated performance metrics.

MISSION: To protect public health, quality of life and the environment as a leader and advocate for the continuous improvement of air quality in Lane County.

VISION: Community partners working together to ensure clean air for everyone.

GOAL 1: Public Health Protection and Air Quality Education

Protect public health through air quality initiatives and foster community engagement via educational programs, prompt response to public concerns, and efforts to ensure equitable protection from air pollution for all communities.

Lag Indicators

- % of days in "Good" or "Moderate" AQI categories by monitoring location (target: 95% annually)
- Number of days with PM2.5 or PM10 exceeding NAAQS 24-hour standards (target: 0)
- % of complaints responded to (target: 95%)

Lead Indicators

- Number of educational events/programs conducted quarterly (target: 2 per quarter)
- Number of wood heating advisories issued (target: prior to 150 AQI in metro)
- Email listserv growth (target: >3% increase annually)

GOAL 2: Enhanced Wildfire Smoke Preparedness

Address the increasing threat of wildfire smoke intrusions to public health in Lane County through public education, collaboration with local jurisdictions, and enhanced monitoring and communication during wildfire events. In addition to seeking funding avenues which directly support this new and growing smoke management service need.

Lag Indicators

- Response time to publish smoke advisories during events (target: before 1pm on days needed)

Lead Indicators

- Maintain LRAPA supporter commercial air sensors in Lane County (target: approximately 75)
- State smoke advisory engagement (target: 100% participation)

GOAL 3: Public Health Protection and Air Quality Education

Ensure compliance with National Ambient Air Quality Standards (NAAQS) and other health-based benchmarks, manage air quality permits for regulated sources, and implement best practices in emissions control, balancing economic development with environmental protection through rigorous permitting processes.

Lag Indicators

- % of area in compliance with NAAQS standards (target: 100%)
- % of permits issued within target timeframes (target: 90%)
- Permit backlog rate (target: <20%)

Lead Indicators

- Number of annual Full Compliance Evaluations completed vs. EPA committed (target: 100%)
- % of enforcement actions resolved within 6 months (target: 80%)

GOAL 4: Regional Air Monitoring and Analysis

Collect, analyze, and report comprehensive air quality data across Lane County to inform policy decisions, alert the public, and track long-term air quality trends.

Lag Indicators	Lead Indicators
- % data completeness for monitoring network (target: >95%) - Timeliness of data reporting to the public and EPA (target: 100% on schedule)	- % of monitors calibrated on schedule (target: 100%) - % uptime for real-time data systems (target: 98%) - Number of monitoring site quality assurance audits completed vs. EPA committed (target: 100%)

GOAL 5: Partnerships and Interagency Coordination

Build and maintain strong relationships with various stakeholders, including industry, local jurisdictions, and community groups, to foster collaboration, improve communication, and ensure that LRAPA's work is responsive to community needs and concerns.

Lag Indicators	Lead Indicators
- Number of industry outreach initiatives completed annually (target: 1 per year) - Number of community outreach initiatives completed annually (target: 1 per year) - Number of partner outreach engagements completed annually (target: 5 per year)	- Diversity of inter-agency meetings attended (target: prioritize local, then state, then federal engagements) - Number of monitoring site quality assurance audits completed vs. EPA committed (target: 100%) - Communication frequency with key stakeholders (target: Quarterly communication) - Number of council presentations delivered (target: 1 per jurisdiction annually)

GOAL 6: Organizational Excellence and Operational Efficiency

Strengthen LRAPA's internal systems, workflows, and operational capacity through technology integration, process improvement, and staff development to enhance organizational effectiveness and service delivery.

Lag Indicators	Lead Indicators
- Employee satisfaction/engagement scores (target: 85% satisfaction) - Staff retention rate (target: >85% annually) - % completion of internal systems modernization (target: 100% of planned upgrades, e.g. LINFO)	- Number of staff professional development training completed (Target: 2 per staff per year) - Number of staff utilizing advancing technologies in workflows (target: > 50%)

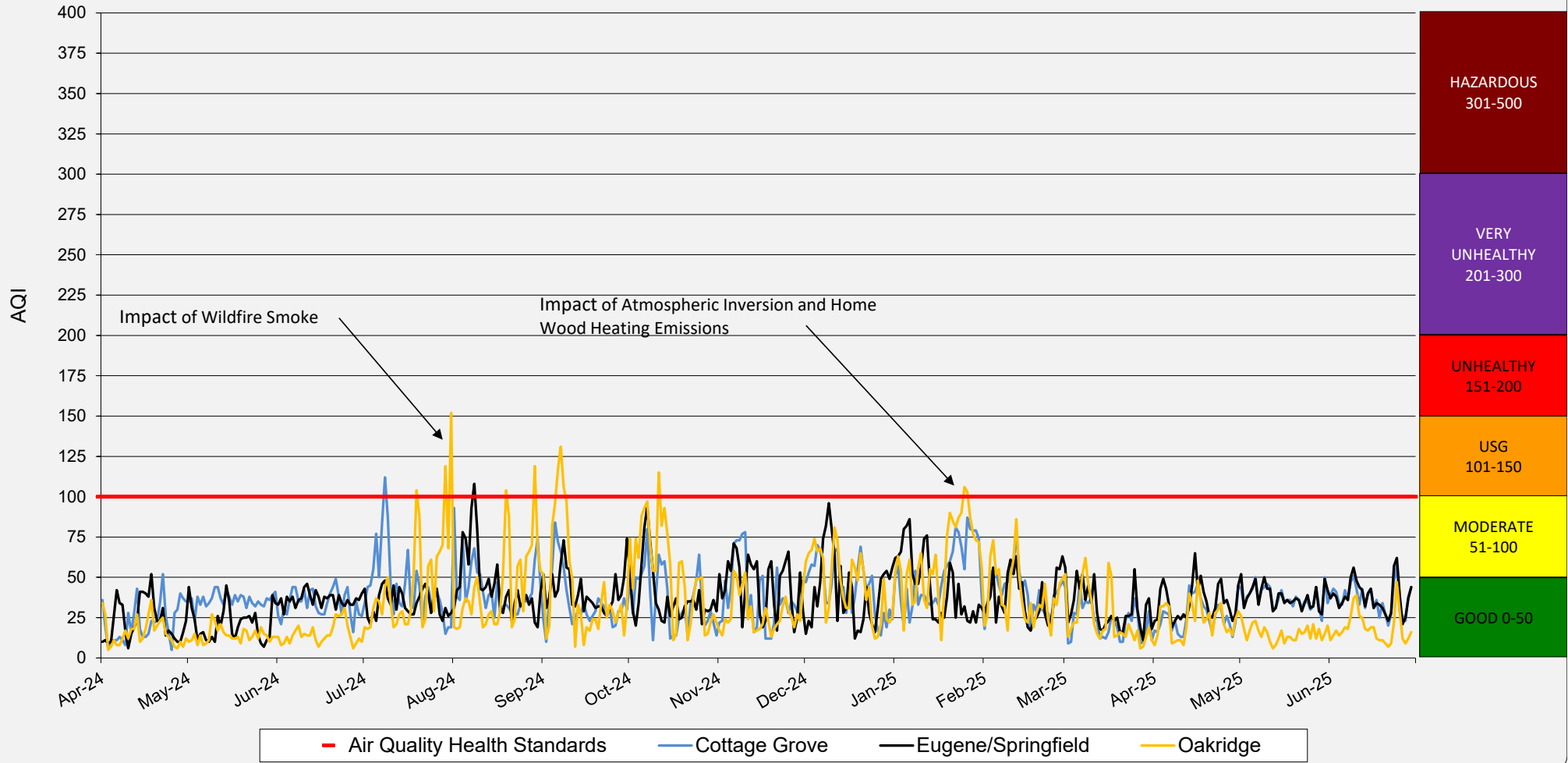
GOAL 7: Financial Sustainability and Transparency

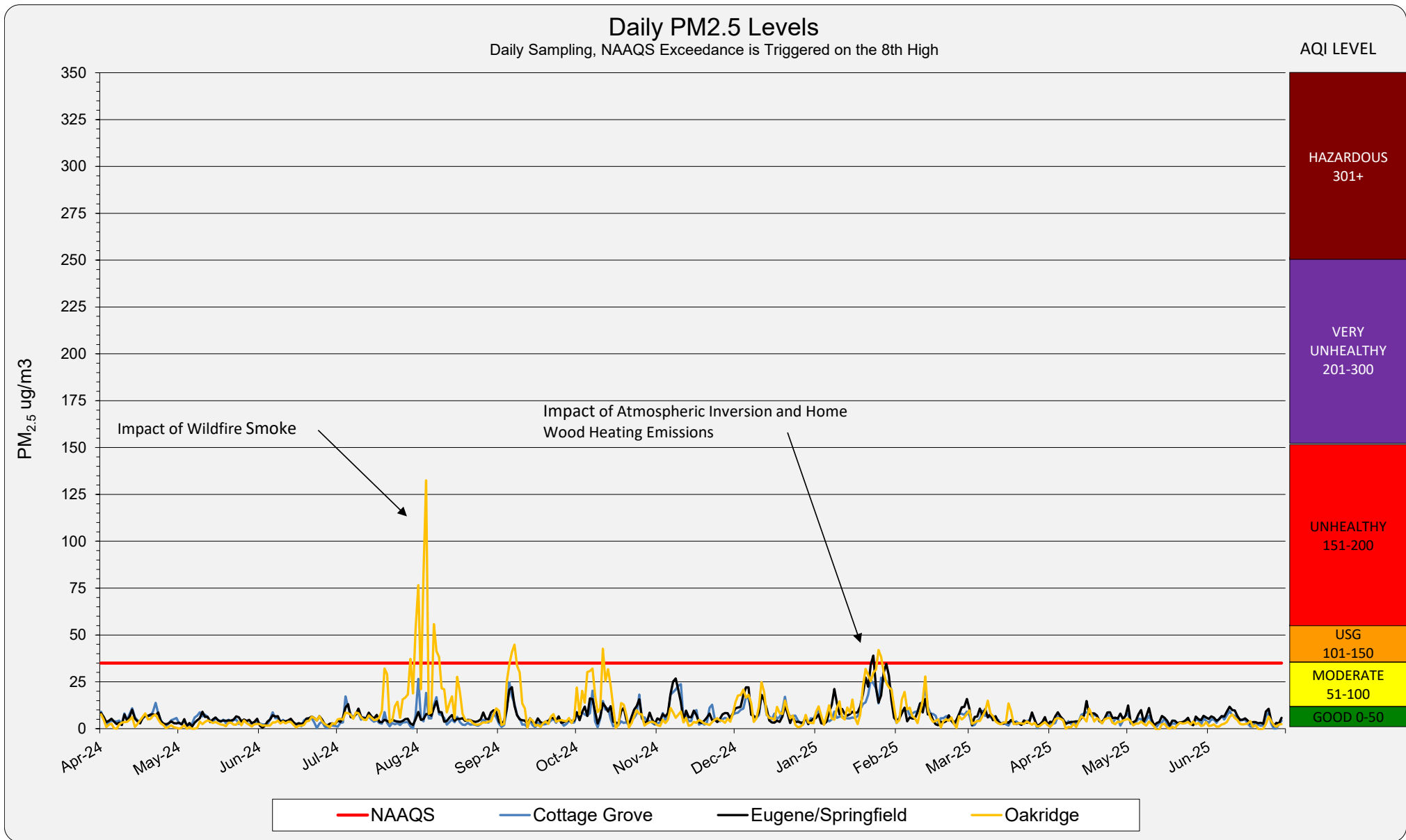
Ensure LRAPA's long-term financial stability and improve fiscal transparency through diversified funding sources, robust financial management practices, and clear communication of financial decisions to stakeholders.

Lag Indicators	Lead Indicators
- Reserve fund supporting annual operating budget (target: 4 months) - Budget variance (target: within 10% of planned)	- Number of financial reports provided to Board & public (target: monthly to Board) - Audit completed before state deadline (target: Dec. 31)

Daily Air Quality Index Chart

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





NEW/OPEN ENFORCEMENT ACTIONS DETAIL REPORT
6/1/2025 -- 6/30/2025
Report of open actions initiated since last report

NEW ENFORCEMENT ACTIONS:

1. LANE COUNTY PUBLIC WORKS - SHORT MOUNTAIN LANDFILL (EUGENE)
 - A. Violation: LRAPA Inspector performed Short Mountain Landfill Q4 asbestos site inspection on 1/7/2025. It was noted that the daily asbestos log was not complete and missing the required information. This is a violation condition 26 (a-c) outlined in ACDP 204740.
 - B. Initial Action Taken: NON #3922 issued 06/05/2025
 - C. Subsequent Action: NONE - Short Mountain Landfill now has two staff assigned with staggering shifts with the task of inspecting the daily asbestos area and signing the log. This is to ensure that they will have consistent six- day coverage. LRAPA is asking that the Short Mountain Management Team follows up with responsible employees and retrains them on what information is required to be documented to Ensure future compliance
 - D. Resolution: CASE CLOSED on 06/05/2025
 - E. Source Type: ASBESTOS
 - F. Initiated By: INSPECTION
2. KIM, STEPHEN ROMI (COTTAGE GROVE)
 - A. Violation: Outdoor burning of prohibited materials (plastic and household garbage).
 - B. Initial Action Taken: NON #3933 issued 06/25/2025
 - C. Subsequent Action: PENDING
 - D. Resolution: PENDING
 - E. Source Type: OUTDOOR BURNING
 - F. Initiated By: COMPLAINT
3. WILDE, DARREL LANE (JUNCTION CITY)
 - A. Violation: Outdoor burning of prohibited materials (truck trailer, box springs and clothing).

- B. Initial Action Taken: NON #3934 issued 06/25/2025
- C. Subsequent Action: PENDING
- D. Resolution: PENDING
- E. Source Type: OUTDOOR BURNING
- F. Initiated By: COMPLAINT

ACTIONS PERFORMED (NON issued prior to 06/01/2025 with current action in reporting period):

1. ATEZ, INC. (EUGENE)
 - A. Violation: Conducted and completed a friable asbestos abatement project at Cascade Manor without performing air clearance prior to leaving the site.
 - B. Initial Action Taken: NON #3923 issued 05/02/2025
 - C. Subsequent Action: NCP #2025-3923 (\$4,865) issued 05/02/2025: request for hearing or reduction approved for \$2,800; if the reduced amount is not agreeable and paid by 7/15/2025 by ATEZ, a hearing will be scheduled.
 - D. Resolution: PENDING
 - E. Source Type: ASBESTOS
 - F. Initiated By: INSPECTION
2. VALLEY ENVIRONMENTAL DBA VAE LLC (LANE COUNTY)
 - A. Violation: Failure to notify LRAPA of date and startup at least 14 days prior to the relocation of a stationary source in accordance with condition 12.6 of Permit No. AQGP-013 General ACDP #208670.
 - B. Initial Action Taken: NON #3927 issued 05/02/2025
 - C. Subsequent Action: NCP #2025-3927 (\$3,200) issued 05/02/2025: request for reduction approved and reduced to \$2,200 and due by 7/15/2025
 - D. Resolution: PENDING reduced civil penalty paid by 7/15/2025
 - E. Source Type: PORTABLE ACI
 - F. Initiated By: LRAPA REPORT REVIEW

3. HARMON, SHARON (EUGENE)
 - A. Violation: Outdoor burning in a burn barrel.
 - B. Initial Action Taken: NON #3929 issued 05/22/2025
 - C. Subsequent Action: NCP #2025-3929 (\$550) issued 05/22/2025: request for reduction approved and reduced to (\$-0-) with signed SFO with agreement for the Respondent to permanently remove all burn barrels, with documents providing proof and cease violating LRAPA's outdoor burning rules and regulations
 - D. Resolution: PENDING submitting the signed SFO by 7/15/2025
 - E. Source Type: OUTDOOR BURNING
 - F. Initiated By: COMPLAINT
4. EMPIRE PROPERTY MANAGEMENT (EUGENE)
 - A. Violation: Respondent allowed open accumulation of friable asbestos containing materials in a rental property.
 - B. Initial Action Taken: NON #3932 issued 05/28/2025
 - C. Subsequent Action: PENDING
 - D. Resolution: PENDING asbestos abatement completion by 7/15/2025
 - E. Source Type: ASBESTOS
 - F. Initiated By: COMPLAINT
5. A & K DEVELOPMENT CO, PAC METAL FAB (JUNCTION CITY)
 - A. Violation: Failed to notify LRAPA prior to the construction of a new stationary source in accordance with LRAPA Rules and Regulations Section 34-010(1)(a); operating an air contaminant source which is listed in Section 37-8010 Table 1 without first obtaining and ACDP from LRAPA in accordance with LRAPA 37-0020(3).
 - B. Initial Action Taken: NON #3903 issued 05/30/2024
 - C. Subsequent Action: NCP #2024-3903 (\$6,800) issued 05/22/2025; 6/20/2025 request for reduction under review
 - D. Resolution: PENDING

- E. Source Type: METAL FABRICATION AND PAINTINGG
 - F. Initiated By: INSPECTIONS
6. AURORA INNOVATIONS / HYDROFARM (EUGENE)
- A. Violation: Failure to submit 2023 semi-annual report required by Condition #28 in the ACDP #200053. The 2023 semi-annual report was due February 15, 2024; failure to submit their 2023 ATEI report by July 1, 2024.
 - B. Initial Action Taken: NON #3910 issued 7/31/2024
 - C. Subsequent Action: NCP #2024-3910 (\$2,500) issued 04/23/2025: request for reduction under review
 - D. Resolution: PENDING
 - E. Source Type: FERTELIZER MANUFACTURING
 - F. Initiated By: INSPECTIONS

PENDING (Enforcement actions issued prior to 6/1/2025 with no reporting action in the current reporting period):

1. DUST 2 DIAMONDS, LLC (SPRINGFIELD)
- A. Violation: Performed an asbestos abatement project without possessing a license to perform asbestos abatement; openly accumulated friable asbestos-containing materials.
 - B. Initial Action Taken: NON #3908 issued 9/6/2024
 - C. Subsequent Action: NCP #2024-3908 (\$8,400) issued 9/6/2024; request for reduction approved and reduced to \$4,800 with a payment plan of \$100 beginning 5/1/2025; on schedule with payment plan.
 - D. Resolution: PENDING
 - E. Source Type: ASBESTOS
 - F. Initiated By: INSPECTION
2. INTERNATIONAL PAPER (SPRINGFIELD)
- A. Violation: Between January 23, 2024, and June 30, 2024, International Paper Company

failed to implement monitoring required by Title V Operating Permit #208850, issued January 23, 2024. It is alleged that the additional monitoring requirements were not implemented when the permit was issued with the required monitoring was not performed for the first (6) six months of 2024 (1/23/2024 - 6/30/2024).

- B. Initial Action Taken: NON #3920 issued 1/30/2025
- C. Subsequent Action: NCP #2024-3920 (\$9,000) issued 1/30/2025; request for reduction and Supplemental Environmental Project (SEP) under review
- D. Resolution: PENDING
- E. Source Type: PAPER & PULP MILL
- F. Initiated By: SELF REPORTING

CLOSED ENFORCEMENT CASES Enforcement Actions issued prior to 3/1/2025 and closed in the current reporting period):

- 1. SIMMONS, STEVE (SPRINGFIELD)
 - A. Violation: Respondent allowed, initiated or maintained the outdoor burning of prohibited materials including furniture (couches), insulation, metal, wires, household garbage plastic, etc., at the site on multiple days and the Mohawk Valley Fire Department was dispatched to extinguish the illegal outdoor burning.
 - B. Initial Action Taken: NON #3931 issued 05/28/2025
 - C. Subsequent Action: No further action request from fire department.
 - D. Resolution: CASE CLOSED on 06/18/2025: No further action.
 - E. Source Type: OUTDOOR BURNING
 - F. Initiated By: FIRE DEPARTMENT REFERRAL