



# AGENDA

LANE REGIONAL AIR PROTECTION AGENCY

CITIZENS ADVISORY COMMITTEE MEETING

TUESDAY JANUARY 28, 2025

12:00 P.M.

## Virtual Participation

By Video: <https://us02web.zoom.us/j/88502781432>

By Audio: +1 253 215 8782

Meeting ID: 885 0278 1432

## In-Person Participation

Due to LRAPA's Temporary office relocation, this meeting will be exclusively on Zoom.

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

1. 12:00 Call to Order/Agenda Review
2. 12:05 Public Participation
3. 12:10 Membership Application & Interview - Michael Koivula
4. 12:25 2024 Permit Holder Draft Survey Summary
5. 12:40 Enforcement Data Review & Communication
6. 12:50 Roundtable
7. 1:00 Adjournment

*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@lrpa.org](mailto:accessibility@lrpa.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@lrpa.org](mailto:accessibility@lrpa.org) o llame a la oficina de LRAPA al 541- 736-1056*



**CITIZENS ADVISORY COMMITTEE  
MEETING MINUTES  
JANUARY 28, 2025**

**MEETING VIA ZOOM**

**ATTENDANCE**

<b>COMMITTEE PRESENT:</b>	<b>LRAPA STAFF PRESENT:</b>
Chair Jim Daniels	Travis Knudsen, Executive Director
Vice-Chair Kelly Wood	Matt Sorensen, Public Affairs & Project Manager
Chris Cline	Heather Gravelle, Administrative Assistant
Peter Dragovich	
Evelina Davidova-Kamis	
Ben Larson	
<b>COMMITTEE ABSENT/EXCUSED:</b>	<b>OTHERS PRESENT:</b>
Paul Metzler	Michael Koivula
Teresa Roark	Elle McLean

<b>AGENDA</b>	<b>ACTION</b>
<b>REGULAR MEETING</b>	
1. Call to Order/Agenda Review.	<b>Chair Jim Daniels</b> convened the regular meeting at noon.
2. Public Participation.	None.
3. Board Meeting Overview.	<b>Chair Daniels</b> and Executive Director <b>Travis Knudsen</b> provided updates from the January 9, 2025 Board meeting.
4. Membership Application and Interview – Michael Koivula.	<b>Michael Koivula</b> introduced himself as an environmentalist and expressed his belief that there are significant opportunities for improving air quality in the region. <b>Mr. Koivula</b> identified several areas of concern, specifically the JH Baxter site and International Paper facility. He expressed interest in addressing these and other industrial operations that may have negative impacts on air quality. Discussion followed.

	<b>MOTION: Chris Cline moved, and Kelly Wood seconded, to refer Michael Koivula's application for CAC membership to the LRAPA Board and recommended approval. The motion passed unanimously.</b>
5. 2024 Permit Holder Draft Survey Summary.	Committee members reviewed the 2024 permit holder draft survey summary provided by <b>Vice-Chair Kelly Wood</b> . After discussion, <b>Chair Daniels</b> indicated he would draft an executive summary of the survey results for review at the February Board meeting.
6. Enforcement Data Review & Communication.	<b>Chair Daniels</b> indicated that Enforcement Data Review and Communication would be discussed at the February 25, 2025 CAC meeting. <b>Mr. Knudsen</b> noted that Colleen Wagstaff, Enforcement Manager, would attend the meeting.
7. Roundtable.	<b>Chair Daniels</b> announced his upcoming retirement and plans to relocate out of state within the next year. While stepping down from the CAC, he offered his assistance during the leadership transition period.
8. Adjournment.	<b>Chair Daniels</b> adjourned the Committee meeting at 1:00 p.m.

*(Minutes recorded by Heather Gravelle)*

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## New Citizen's Advisory Committee Application

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**From** Lane Regional Air Pollution Agency <no\_reply@www.lrapa.org>  
via mail1.wpengine.com

**Date** Sun 1/5/2025 8:21 AM

**To** Public Affairs <PublicAffairs@LRAPA.ORG>

**Name**

Michael Koivula

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**Address**



**Phone**



**Email**



**Community Segment**

General Public - \$0.00

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**In your view, what should be the primary focus of an advisory committee in influencing environmental policy?**

provide liason between the general public and staff to be aware of and respond to community concerns.

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**What motivates you to join the advisory committee, and what unique contributions do you envision making?**

air quality issues regarding industrial pollutants and wildfire smoke

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**Please describe your level of familiarity with LRAPA, including any specific areas of interest?**

Understand the relationship between LRAPA and other local governments. Understand LRAPAs role in regulation and its relationship with State DEQ

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**Are you involved in any other advisory boards, committees, neighborhood associations, or other community group? If so, please specify and describe your role and responsibilities in these organizations?**

not currently. Former Springfield Planning Commissioner (8 years) and member of Lane County Vegetation Management Committee (3 years)

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**What specific factors or aspects do you think are most important to consider when assessing how well LRAPA is doing its job?**

what is current air quality in Lane County and what can be done to improve it when it is not up to reasonable standards. Particularly concerned with air quality issues regarding both Lane County and out of county industries.

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**How do you keep yourself informed about the latest changes and updates in air quality regulations?**

Newspaper, magazines, webpages, LRAPA press releases

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**Please provide a brief overview of your professional, educational, and volunteer experiences, focusing on how these experiences equip you to contribute to the Committee's work.**

30 years as professional land surveyor. Former member of Lane County Vegetation Management Committee, City of Springfield Development Advisory Committee and Springfield Planning Commission. Worked in all of these volunteer positions to foster

communication within and external to the committees and to increase public knowledge and participation in the work of the committees, mentorship to new members and good relations with staff and applicants/public participants. Tireless efforts to keep abreast of and evaluate regulations, proposed changes in codes and State wide Planning goals.

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

YES

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Sent from [Lane Regional Air Protection Agency](#)



## 2024 LRAPA Permit Holder Survey Results

11/27/2024 – Kelly Wood

The survey results in this summary include only those respondents who identified themselves as Representatives of Permittees or Employees of Regulated Company. The surveys were completed between November 1, 2023, and October 31, 2024. A total of 52 respondents participated in the survey.

Approximately 90% of respondents responded that they had contacted LRAPA with permitting questions and/or for assistance. The other three indicated their contact was for general information and assistance, or problem resolution.

The respondents were from all over Lane County. The most respondents from any one area were Junction City with six, followed by Eugene – Bethel-Danebo and North Springfield each with five.

Approximately 4% of the respondents indicated their age range to be 25-34, 13% selected 35-44, 30% selected 45-54, 42% selected 55-64, 11% selected 65 and over. Five participants in the survey skipped this question.

Approximately 57% of the respondents indicated their gender to be male, 34% indicated female, and 9% preferred not to answer. Five participants in the survey skipped this question.

Approximately 2% of respondents indicated their race/ethnicity to be Asian, 77% indicated white, 15% preferred not to say, and 6% indicated other. Five participants in the survey skipped this question.

Approximately 13% of respondents indicated their highest level of education to be high school diploma or equivalent, 30% selected some college, no degree, 4% selected associate degree, 25% selected bachelor's degree, 17% selected master's degree, and 11% preferred not to say. Five participants in the survey skipped this question.

Approximately 2% of the respondents indicated their household income to be \$25,000-\$49,999, 7% indicated \$50,000-\$74,999, 7% indicated \$75,000-\$99,999, 30% indicated \$100,00-\$149,999, 28% indicated \$150,000 or more, and 26% preferred not to say. Six participants in the survey skipped this question.

Approximately 72% of the respondents indicated that they do not have children under the age of 18 living in the household, 15% indicated that they do, and 13% preferred not to say. Six participants in the survey skipped this question.

**Q4 – How satisfied are you with the Agency’s facilities, including your ability to access the agency’s office location, agency signs, and cleanliness?**

Approximately 62% of respondents were satisfied or very satisfied with the agency’s facilities, 17% felt neutral, and 21% had never visited the facility. No respondents were unsatisfied with the facilities.

**Q5 – How satisfied are you with Agency Staff, including employee courtesy, friendliness, and knowledgeability?**

Approximately 88% of respondents indicated that they are satisfied to very satisfied with Agency Staff. Five respondents were neutral to staff, and one person responded that they are very unsatisfied. It is worth noting that this question received the highest percentage of respondent satisfaction in the survey.

Respondents would like to see a more proactive, supportive, and cooperative relationship between agency staff and permittees. The current approach feels like a “management by mistake” approach that only involves finding and pointing out problems. Respondents would like to see educational and outreach opportunities aimed at bringing industry and staff together to review and discuss federal, state, and local rules and best practices. The rules and statutes are very complex, and the cost and availability of consultants are not always an option.

LRAPA should consider additional staff, including a consultation service similar to other regulatory agencies to provide more guidance and support to permittees. Staff turnover has been high in the past few years, and it puts added strain on everyone to repeat work and efforts. Perhaps LRAPA should investigate ways to support these positions at the agency. Additionally, it would be beneficial if the agency and permit holders can find a way coordinate when there is new LRAPA staff or industry representatives assigned to the site to ensure that both parties are aware of the change and can schedule a time for proper introductions and permit review.

Respondents also indicated that if the permits were more understandable, compliance would not be so challenging. It would be very helpful for LRAPA to provide permittees with user-friendly software, forms, and spreadsheets that include specific reporting requirements, information, and calculations.

One respondent feels that regulations are not applied equally across industries, even those of the same type. Multiple respondents however feel that LRAPA should implement more punitive fines on larger corporations / polluters and better support local businesses.

**2022 Survey Results- Q1 – LRAPA staff treated you in a respectful and courteous manner.**

Of the 75 respondents, 100% of them agreed or strongly agreed. There were zero complaints or comments pertaining to issues or concerns with staff interactions. Several respondents specifically commented on having always received prompt and friendly assistance from staff. Feedback received in Q6 and Q8 indicates that permit holders are satisfied with the current service and have no recommendations for improvements pertaining to staff.



**2022 Survey Results Q2 – LRAPA staff provided you with helpful/knowledgeable answers and problems solving information regarding questions and concerns, including any supplemental materials if requested.**

Of the 75 responding results, approximately 95% agreed or strongly agreed with the statement. Multiple respondents voiced that staff have been and continue to be accessible, professional, knowledgeable and friendly. Several permit holders did request updated forms, tools, reports, and training opportunities which may prevent some of the need to contact staff with questions.

**2022 Survey Results Q5 – Please indicate your overall valuation of LRAPA staff.**

Nearly 75% of respondents indicated that overall valuation of staff is above average or excellent. Approximately 23% of respondents selected average, and two indicated below average. In total, approximately 98% of the permit holder respondents feel that the valuation of LRAPA staff is average or better.

**2022 Survey Results Q6 – How can LRAPA improve?**

In general, permit holders would like to see updated forms and tools for record keeping and reporting. Permit holders are interested in the creation of incentives for sustainable practices and/or implementing measures which reduce emissions. Permit holders also expressed interest in continued education and communication pertaining to both personal and industry roles in air emission reductions and contributions.

**Q6 – How satisfied are you with the Agency’s response time to your inquiries or concerns?**

Approximately 81% respondents answered that they are satisfied to very satisfied, nine respondents felt neutral, and one responded that they are unsatisfied.

**2022 Survey Results Q3 – LRAPA staff assisted you in a timely manner.**

Of the 75 respondents, approximately 97% agreed or strongly agreed. Respondents generally commented that LRAPA staff have always provided timely and friendly service.

**Q7 – How would you rate the effectiveness of LRAPA’s communication, including website, public notices, and social media?**

Approximately 56% of respondents selected satisfied and 25% selected very satisfied. Approximately 9% answered that they were neutral, and 10% of people responded that communications are ineffective to very ineffective.

One respondent commented that interactions are generally positive, but communications can be improved (e.g. notices about the relocation during the remodel).

**2022 Survey Results Q7 – What feedback do you have on LRAPA’s website?**

Based on the responses, it does not appear that many of the permit holders are utilizing the website on a regular basis. The limited responses of active users indicate that the new website is easy to navigate and provides more updated information and helpful links to pertinent information.

**Q8** – Comments received have been incorporated into those questions seemingly most applicable.

**Q9 – How well do you feel LRAPA serves your community in terms of air quality management?**

Approximately 40% of respondents feel that LRAPA does very well and 42% selected well, indicating an 82% satisfaction overall. Five respondents were neutral, and four respondents feel LRAPA's service in terms of air quality management is poor to very poor.

**Q22 – How satisfied are you with LRAPA's permitting process, including application review, approval, and communication?**

Approximately 52% of respondents selected satisfied and 26% selected very satisfied. These responses indicate an overall satisfaction of 78%. Seven respondents were neutral, and four respondents answered unsatisfied to very unsatisfied.

Respondents recognize that LRAPA is required to enact new laws and adopt DEQ changes but having more notice and information is needed. With all the new requirements on existing permits plus new regulations like Cleaner Air Oregon, respondents feel that regulations and fees are doubling up. Assisting local businesses to become more environmentally friendly via permitting and compliance should be the focus, not regulating industries out of business.

**2022 Survey Results Q4 – Compared to other regulatory fees, are LRAPA fees more reasonable, less reasonable, or about the same?**

Approximately 75% of respondents rated LRAPA as "about as reasonable" as other regulatory fees. The second highest rating was "slightly less reasonable".

Multiple respondents commented that the fees are excessive and /or are a financial hardship for smaller business when combined with the other regulatory fees. It was suggested that LRAPA consider incentives, rewards, and discounts for permittees who implement emission reduction measures / sustainable practices beyond the LRAPA requirements. It was also mentioned that more explanation could be provided as to what the fees and permitting actually accomplish.

**Q23 – Do you feel that LRAPA's regulations are reasonable and fairly applied to your business?**

Approximately 74% of respondents selected yes and feel that LRAPA's regulations are fairly applied, seven selected no and six were unsure.

**Q24 – How well do you feel LRAPA communicated regulatory changes and updates to your business?**

Approximately 48% of respondents selected well and 28% selected very well. These responses indicate an overall satisfaction of 76%. Seven people selected neutral, and five people chose poorly to very poorly.

**Q25 – Have you experienced any issues or difficulties in your interactions with LRAPA?**

Approximately 90% of respondents stated that they had not experienced any issues or difficulties with LRAPA interactions. Four respondents selected yes, and one person was unsure.

**Q26 – How well do you feel LRAPA fairly regulates and enforces air quality standards for businesses?**

The responses indicate that 70% of respondents feel LRAPA is fair in regulation and enforcement. Of those 70%, 34% feel LRAPA does very well while 36% feel that LRAPA does well. Eleven people felt neutral on this and four people feel that LRAPA does poorly to very poorly.

**Q-27 – Do you feel that LRAPA is supportive of your business’s efforts to comply with air quality regulations?**

Approximately 82% of respondents feel that LRAPA is supportive of business efforts. Three people indicated that LRAPA is not supportive, and six people were unsure.

**2022 Survey Results Q8 – Additional Comments**

Several respondents stated appreciation for the partnership that has been established between industry, staff, and the community.

**Q40 – How likely are you to participate in a public meeting on an industrial facility in Lane County?**

Approximately 58% of respondents indicated that they were unsure if they would like to participate in a public meeting. About 21% selected likely to very likely, and the remaining 21% indicated they were unlikely or very unlikely to participate.

**Q40 – Which public meeting format is the most convenient for you to participate in?**

Approximately 40% of respondents prefer virtual meetings, 17% prefer in-person, 40% have no preference as either is fine, and one person was unsure.

**Q42 – When would a public meeting be generally most convenient for you?**

Approximately 36% of respondents prefer weekday mornings, 38% prefer weekday afternoons, 17% prefer weekday evenings, and four people indicated that weekend meetings are most convenient.

**Q43 -** Comments received have been incorporated into those questions seemingly most applicable.



## Director’s Report for November and December 2024

Meeting Date: January 9, 2025  
 Department: Director’s Office  
[www.lrapa.org](http://www.lrapa.org)

Agenda Item No. 13  
 Staff Contact: Travis Knudsen  
 541-736-1056 ext. 217

### NOVEMBER & DECEMBER 2024 AQI CHARTS AND STATS:

Site	Date	Max AQI	Pollutant
Eug/Spfld	8-Nov-24	96	PM
Oak	11-Dec-24	81	PM
CottGrv	10-Nov-24	78	PM

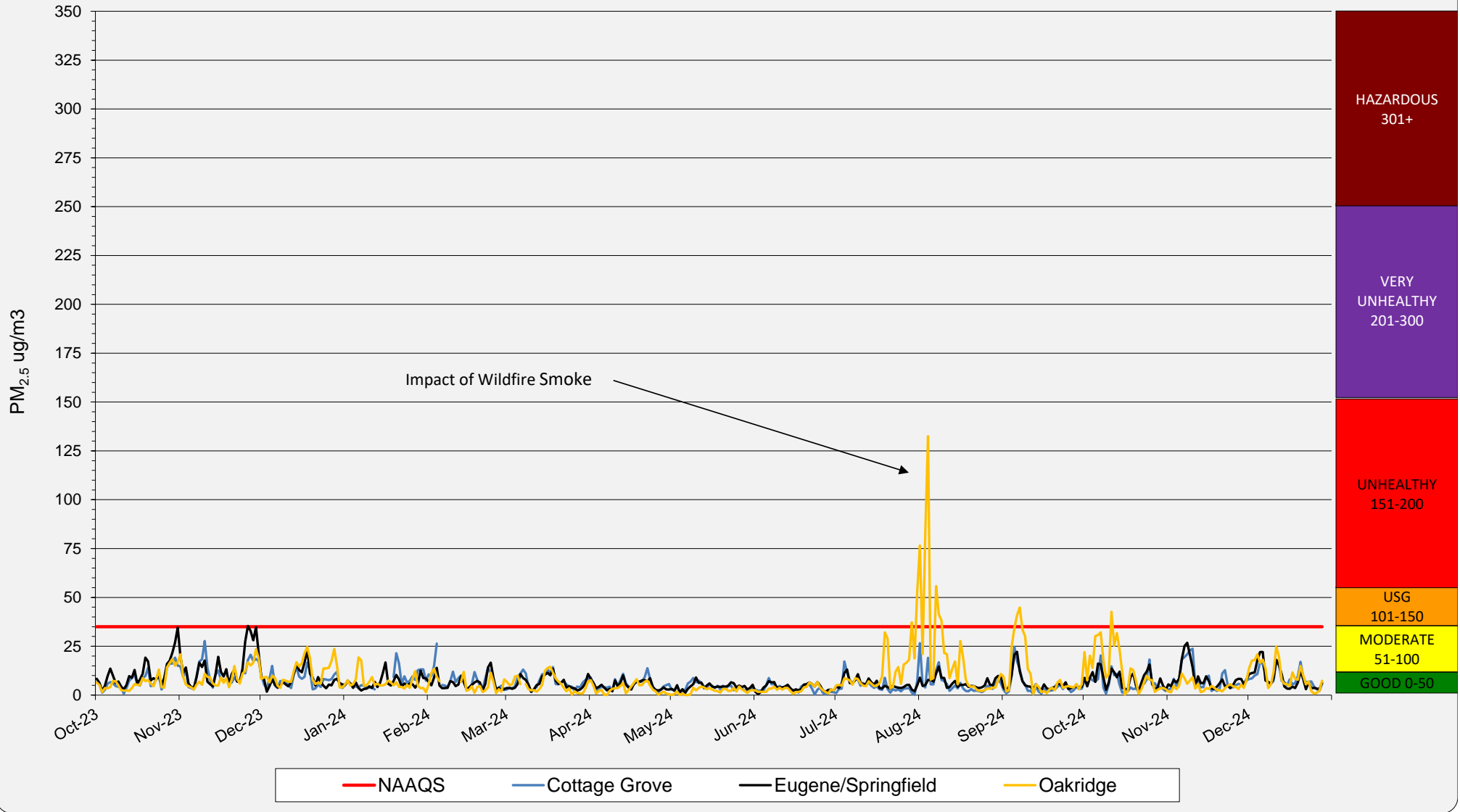
AQI	Eug/Spfld	Oak	CottGrv	AQI Range	PM2.5 Range, ug/m3	Ozone Range, ppb
Good	39	44	42	0-50	0-9	0-54
Moderate	22	17	19	51-100	9.1-35.4	55-70
USG	0	0	0	101-150	35.5-55.4	71-85
Unhealthy	0	0	0	151-200	55.5-125.4	86-105
Very Unhealthy	0	0	0	201-300	125.5-225.4	106-200
Hazardous	0	0	0	301+	225.5+	201+

**Attachment No. 1: Air Quality Index (AQI) charts for Lane County (November/December 2024)**

**Attachment No. 2: PM2.5 index charts for Lane County (November/December 2024)**

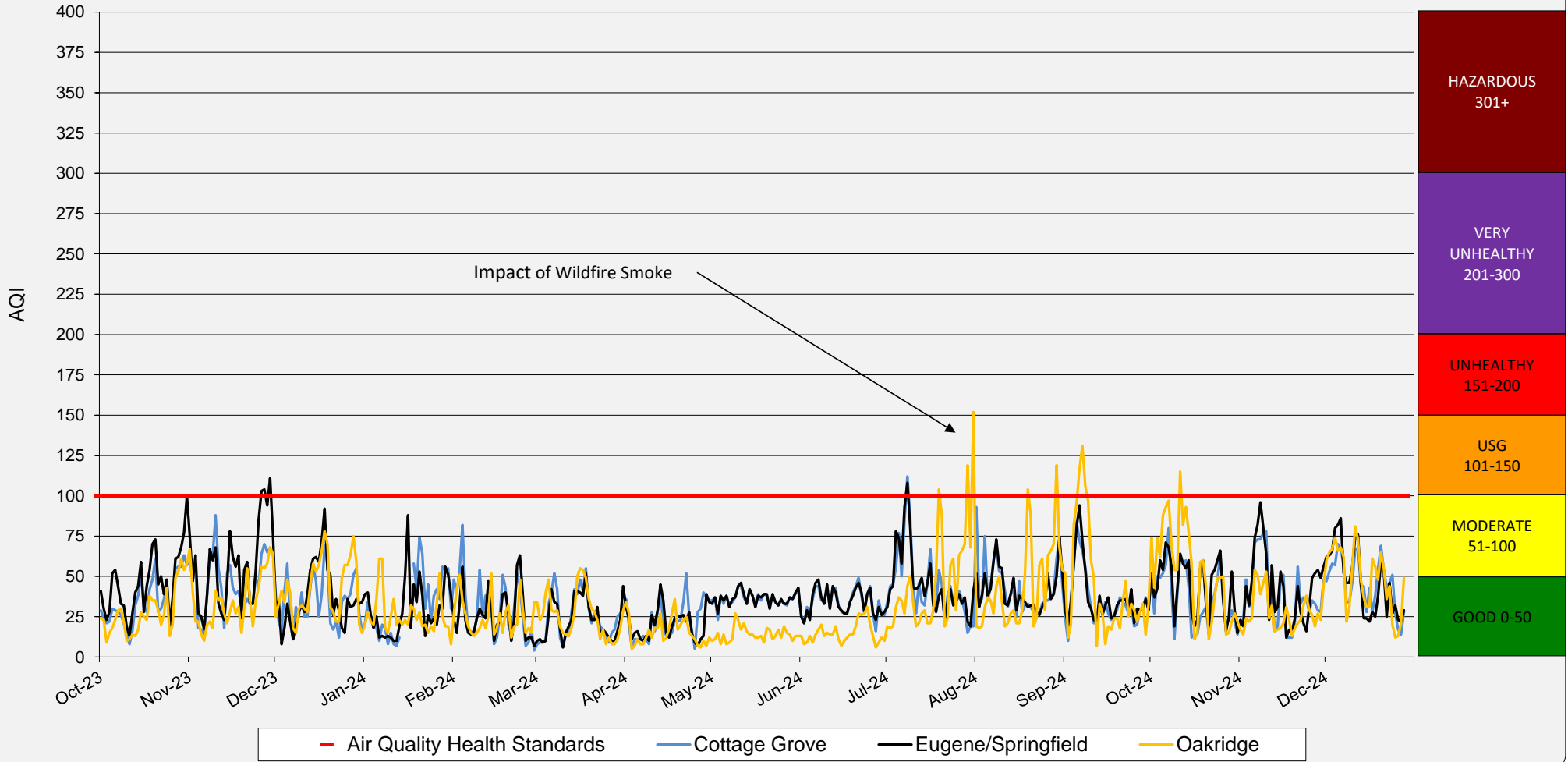
# Daily PM2.5 Levels

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



# Daily Air Quality Index Chart

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



**COMPLAINTS RECEIVED: 11/1/2024 thru 12/31/2024:**

<b>Smoke complaints: 77</b>
58 - Outdoor Burning
13 - Home Wood Heating
6 – Slash Burning
<b>Industry: 13</b>
5 - International Paper
2 - Stella Jones
2 - Knife River
1 - Swanson Group Mfg. LLC
1 - 76 Gas Station
1 - Pacific Recycling
1 - Rexius Organics Processing Facility
<b>Miscellaneous: 12</b>
1 - Vehicle Exhaust
1 – Dryer Sheet Fragrance
10 - Unknown
<b>Total: 102</b>

The calendar year 2024 compares to previous years:

<b>Year</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>2023</b>	<b>*2024</b>
Dust	15	17	26	12	7	8
Ag Burning / Spraying	6	2	7	2	3	3
General Air Quality	12	4	8	1	25	32
Home Wood Heating	128	74	57	67	52	39
Industry	170	100	336	198	97	75
Outdoor Burning	402	423	243	292	254	253
Slash Burning	16	12	10	6	12	9
Miscellaneous	67	59	40	102	72	103
Unknown	39	74	71	45	65	79
<b>Total</b>	<b>855</b>	<b>765</b>	<b>798</b>	<b>725</b>	<b>587</b>	<b>601</b>

\* Year-To-Date

**ENFORCEMENT ACTIONS STATUS REPORT**  
**11/1/2024 to 12/31/2024**

Calendar year 2024 compared to previous years:

Year	2019	2020	2021	2022	2023	*2024
Notices of Non-compliance and Warnings	55	15	21	24	19	9
Notices of Violation with Civil Penalties	37	26	17	24	15	5

\* Year-To-Date.

**ENFORCEMENT: 11/01/2024 to 12/31/2024**

Category of Violation	New	Follow-Up Action	Pending	Closed	Total
Asbestos	-	-	3	-	3
Industrial	-	-	5	-	5
Outdoor Burning	-	-	4	-	4
Fugitive Dust	-	-	-	-	-
Home Wood Heating	-	-	-	-	-
<b>Totals</b>	-	-	<b>12</b>	-	<b>12</b>

**ENFORCEMENT ACTIONS DETAIL REPORT**

**11/1/2024 -- 12/31/2024**

**Report of open and actions initiated since last report**

**NEW ENFORCEMENT ACTIONS: 11/01/2024 -- 12/31/2024 – None.**

**PENDING ENFORCEMENT ACTIONS: 11/01/2024 -- 12/31/2024**

1. T.J. ROBBINS (FALL CREEK)
  - A. Violation: Allowed for the outdoor burning of prohibited materials (machine parts, aerosol can, metal wire, canned food containers, etc.).
  - B. Initial Action Taken: NON #3907 issued 09/06/2024
  - C. Subsequent Action: NCP #2024-3907 (\$275) issued 09/06/2024: no response and no payment received; a default order judgment is in process for a lien on the property
  - D. Resolution: PENDING
  
2. 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 09/06/2024
  - C. Subsequent Action: NCP #2024-3908 (\$8400) issued 09/06/2024: request for reduction under review.
  - D. Resolution: PENDING
3. A & K DEVELOPMENT CO, PAC METAL FAB (JUNCTION CITY)
- A. Violation: Failed to notify LRAPA prior to the construction of a new stationary source in accordance with LRAPA Rules and Regulations Section 34-010(1)(a); operating an air contaminant source which is listed in Section 37-8010 Table 1 without first obtaining and ACDP from LRAPA in accordance with LRAPA 37-0020(3).
  - B. Initial Action Taken: NON #3903 issued 05/30/2024
  - C. Subsequent Action: PENDING – documents submitted by 9/20/2024 under review
  - D. Resolution: PENDING
4. PETROCARD INC (GOSHEN) (GOSHEN)
- A. Violation: The permittee failed to submit in a timely manner performance testing records to LRAPA which demonstrate compliance with vapor testing requirements outlined in permit conditions 5.1.a and 5.1.b. On 2/25/2022 the permittee was notified by LRAPA that they had exceeded the annual throughput threshold of 480,000 gallons of gasoline in 2019 and were therefore subject to the vapor recovery testing requirements outlined in the permit. On 4/8/2022 LRAPA was advised that vapor recovery testing could not be completed since the lines were manifolded and the issue was escalated to construction to isolate the lines. On 7/7/2022 LRAPA called and emailed the permittee requesting an update. On 8/2/2022 LRAPA called and emailed the permittee requesting an update. Permittee responded advising that they were still working to fix the issue. On 10/5/2022 LRAPA emailed the permittee requesting an update. On 10/26/2022 LRAPA called and emailed the permittee requesting an update.
  - B. Initial Action Taken: NON #3872 issued 11/03/2022
  - C. Subsequent Action: NCP #2022-3872 (\$3000) issued 12/08/2022: submitted the test results over 12-month late, therefore the request for reduction was not approved. No response to payment has been received, a default order judgment is in process for a lien on the property.
  - D. Resolution: PENDING
5. JOHN A. RANKIN AND STEVE FOWLKES (SPRINGFIELD)
- A. Violation: 43-015(10)- ASBESTOS ABATEMENT NOTIFICATION REQUIREMENTS. Except as provided for in 43-015-8, written notification of any asbestos abatement project must be provided to the Agency on a form prepared by and available from the Agency, accompanied by the appropriate fee; 43-015(11)(C)- Enclose the area of the asbestos-containing materials to be abated, in a negative pressure enclosure prior to abatement unless prior approval has been granted by the agency; 43-015(11)(G)- The asbestos abatement project area shall be adequately cleaned at the conclusion of the project to assure removal of all asbestos debris; 43-015(11)(N)- Open storage or open accumulation of friable asbestos-containing material or asbestos containing waste material is prohibited; 43-015(11)(P)- No person shall conduct an asbestos abatement project unless they possess a current asbestos abatement Contractors license or worker's certification, issued by the Department under OAR 340-248-040 or OAR 340-248-0120 and OAR 340-248-0130, respectively, unless exempted by 43-015-8 and/or 43-015-9; 43-015(11)(S)- A certified supervisor is required to be present on each asbestos abatement project other than a small-scale short-duration activity; 43-015(11)(T)- An owner or operator of a facility

shall not allow any persons other than those employees of the facility owner or operator who are appropriately certified or a licensed asbestos abatement contractor to perform an asbestos abatement project in or on that facility unless exempted by 43-015-8 or 43-015-9; 43-015-19(B)- Persons disposing of asbestos-containing waste material must notify the landfill operator of the type and volume of the asbestos-containing waste material; 43-015(19)(B)(1)- All asbestos-containing waste materials must be adequately wetted to ensure that they remain wet until delivered to an authorized landfill, and either: (a) processed into non-friable pellets or other shapes; or (b) packaged in leak-tight containers such as two plastic bags with a minimum thickness of 6 mil., or fiber or metal drum. Containers must be labeled as follows: (i) the name of the asbestos waste generator and the location where the asbestos waste was generated; and (ii) a warning label that states: DANGER Contains Asbestos Fibers Avoid Creating Dust Cancer and Lung Disease Hazard Avoid Breathing Airborne Asbestos Fibers Alternatively, warning labels specified by 29 CFR 1926.1101(k)(7)(8/19/94) may be used; 43-105(19)(E)- All asbestos-containing waste material must be deposited as soon as possible by the waste generator at: (1) An asbestos-containing waste disposal site authorized by the Department and operated in accordance with the provisions of this rule;

- B. Initial Action Taken: NON #3877 issued 03/06/2023
- C. Subsequent Action: NCP #2023-3877 (\$10400) issued 03/06/2023: request for reduction approved and reduced to \$5,200 on 04/19/2023 with a payment schedule of \$400 per month and is on schedule with payments with a balance of \$400.
- D. Resolution: PENDING

6. KYLE MCLENNAN, BRUCE R MCLENNAN (VENETA)

- A. Violation: Failure to obtain an asbestos survey from an accredited asbestos inspector prior to conducting the demolition of a facility; Burning construction/demolition waste without first obtaining an LRAPA letter permit.
- B. Initial Action Taken: NON #3880 issued 04/11/2023
- C. Subsequent Action: NCP #2023-3880 (\$3,650) issued 04/11/2023; no response and no payment received; a default order judgment is in process for a lien on the property
- D. Resolution: PENDING

7. APRO LLC DBA UNITED PACIFIC ROCKET # (SPRINGFIELD)

- A. Violation: The permittee failed to submit performance testing records to LRAPA which demonstrate compliance with triennial vapor testing requirements outlined in permit conditions 5.0. Permittee last submitted testing results relative to conditions 5.1.a and 5.1.b on February 4th, 2020, and therefore is required to have testing conducted by February 4th, 2023. Condition 7.1.c of the permit requires notification of upcoming testing be submitted to LRAPA and condition 7.2 requires test results be submitted to LRAPA no later than 30 after testing has occurred.
- B. Initial Action Taken: NON #3886 issued 04/25/2023
- C. Subsequent Action: NCP #2023-3886 (\$2,250) issued 06/12/2023: no response and no payment received; a default order judgment is in process for a lien on the property
- D. Resolution: PENDING

8. SEALS, MARK (ELMIRA)

- A. Violation: Outdoor burning of prohibited materials (metal, plastic, rubber, etc.).
- B. Initial Action Taken: NON #3888 issued 06/13/2023

- C. Subsequent Action: NCP #2023-3888 (\$550) issued 07/31/2023: no response and no payment received; a default order judgment is in process for a lien on the property
  - D. Resolution: PENDING
9. CARTER, LARRY; VERNON VENSON (SPRINGFIELD)
- A. Violation: Allowing for the open burning of prohibited materials (pressure treated wood, railroad ties, plastics, clothing, drywall, metal, etc.)
  - B. Initial Action Taken: NON #3895 issued 12/14/2023
  - C. Subsequent Action: NCP #2023-3895 (\$550) issued 12/18/2023; no response and no payment received; a default order judgment is in process for a lien on the property
  - D. Resolution: PENDING
10. WOOLMAN, TIM (VENETA)
- A. Violation: Allowing for the burning of prohibited materials (plastics).
  - B. Initial Action Taken: NON #3898 issued 03/01/2024
  - C. Subsequent Action: NCP #2024-3898 (\$850) issued 03/07/2024; no response and no payment received; a default order judgment is in process for a lien on the property
  - D. Resolution: PENDING
11. EMERALD PEOPLE'S UTILITY DISTRICT (EUGENE)
- A. Violation: Submitted a partial 2023 annual report a 12-month rolling PSEL calculation spreadsheet which demonstrated that the facility emissions for PM2.5, CO and NOx were in excess of the permitted emission limits during the 12-month periods ending in September - December 2023 and in 2024.
  - B. Initial Action Taken: NON #3902 issued 06/06/2024
  - C. Subsequent Action: PENDING – reviewing additional documents submitted.
  - D. Resolution: PENDING
12. AURORA INNOVATIONS / HYDROFARM (EUGENE)
- A. Violation: Failure to submit 2023 semi-annual report required by Condition #28 in their 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 07/31/2024
  - C. Subsequent Action: Submitted reports are under review
  - D. Resolution: PENDING

### **OUTDOOR BURNING LETTER PERMITS: 11/01/2024 TO 12/31/2024**

**There were two Outdoor Burning Letter Permits (OBLP) issued in November and December 2024.**

1. Issued Special Letter Permit 20B24-11-01 on November 7 to Mohawk High School, 308300 Wendling Road - Jeff Little, Marcola, to burn 10 cubic yards of miscellaneous debris located at 308300 Wendling Road, Marcola.
2. Issued Special Letter Permit 20B24-11-02 on November 15 to Thompson Timber Co, 6860 SW Winding Way, Corvallis, to burn 707 cubic yards of forest slash debris located at Territorial Road, Junction City.

**ASBESTOS ABATEMENT: 11/01/2024 to 12/31/2024**

For perspective, here is how the total number of asbestos abatement notices filed, how many were schools, and the number of notices inspected for calendar year 2024 compares to previous years:

Calendar year 2024 compares to previous years:

Year	2019	2020	2021	2022	2023	*2024
Total Asbestos Abatement Notices	488	439	408	465	466	436
School Asbestos Abatement Notices (NESHAP)	16	25	20	16	17	21
Number of Asbestos Abatements Inspected	94	93	104	115	91	109

\* Year-To-Date.

**PERMITTING (TITLE V AND ACDP):**

- Currently 15 sources, Title V permits
- Currently approximately 275 sources, Air Contaminant Discharge Permits (ACDPs)

Permits Currently in Queue:

Category of Permit Activity	Title V	ACDP	Total In Queue
New	1	2	3
Renewals	3	11	14
Modifications		3	2
Constructions			
General TV			
Terminated Permits		1	1

Permit Activities Issued Year-to-Date (1/1/24 – 12/31/24):

- **Title V = 11**
- **ACDP = 42**

Permits on public notice during 11/01/2024 to 12/31/2024:

Source Name	Reason for Public Notice	Type of Permit
Kingsford Mfg.	Renewal of Title V	Title V renewal. Off public notice 11/18/2024
9Wood Inc.	Construction ACDP for Type 3 Change	Construction ACDP at a Title V facility. Off public notice 12/13/2024

Delta Sand & Gravel, Inc	Permit Renewal	Standard ACDP. Off public notice 1/16/25
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Permits with public hearing notice during 11/01/2024 to 12/31/2024:

Source Name	Reason for Public Hearing	Date of Public Hearing
NA		

Permit backlog as of 1/1/25:

Permit Type	Total Number of Permits by Type	Number of Permits Extended Administratively	Percentage of Total (%)
Title V	15	1	7%
Standard	24	4	17%
Simple	27	4	15%
<b>Total</b>	<b>66</b>	<b>9</b>	<b>13%</b>

## MEDIA INTEREST, EXTERNAL COORDINATION AND OUTREACH

Date	Media	Person	Topic
2/9/2024	KEZI	Robert Desaulniers	Springfield Burning Variance
2/25/2024	KEZI	Noah Chavez	Springfield Burning Variance
03/28/2024	Ore. News Service	Eric Tegethoff	Air Quality Awareness Week
03/28/2024	KVAL	Juliette Smith	Allergy Season
04/25/2024	KLCC	Tiffany Eckert	ALA Report
04/29/2024	KEZI	Aaron Arellano	ALA Report
05/03/2024	Eugene Emerald	Andres Baisch	ALA Report
06/04/2024	KXCR	Larry Bloomfield	Community Talk Radio
07/30/2024	KEPW	John Quetzalcoatl Murray	Short Mountain and EPUD PSEL exceedance
08/12/2024	KMTR	Gold Meadows	J.H. Baxter cleanup and LRAPA role in process.
09/18/2024	KMTR	Aaron Arellano	J.H. Baxter EPA visit w/ Casey Sixkiller and DEQ
09/27/2024	KEZI	News Staff	Delay starts to outdoor burning to 10/15
09/27/2024	KMTR	Zach Bruhl	Share \$1M award for EJG2G Grant for wildfire smoke mitigation & health study
09/27/2024	KMTR	News Staff	Delay starts to outdoor burning to 10/15
09/30/2024	KEZI	Aaron Arellano	Delay starts to outdoor burning and ongoing delays to start of burning season
10/3/2024	KLSR FOX	Angela Yamamoto	\$1M EJG2G award and work in Oakridge
10/6/2024	KMTR	Takur Conlu	Valley smoke due to fires & wind
10/9/2024	KEZI	Ryan Bonham	Outdoor Burning delayed to 11/1 Lane County
10/9/2024	KMTR	News Staff	Delay outdoor burning to 11/1
10/11/2024	KVAL	Dannie	AQI for weekend and Duck's game
10/11/2024	Eugene Weekly	Bentley Freeman	Questions on Hazeldell Quarry in Oakridge and

			AQI
10/11/2024	Oregon Journalism Group	Jeff Manning	Questions on wildfire smoke impacts from 2020 fires
10/11/2024	KMTR	News Staff	Kingsford public comment on Title V permit changes
10/18/2024	KMTR	News Staff	Correction on poor initial story and description of permit changes for Kingsford
10/21/2024	KEZI	News Staff	ODF Ended fire season and LRAPA opened outdoor burning 10/22
11/2/2024	Bend Bulletin	Richard Coe	Editorial- Oregon DEQ needs to reduce air quality permit backlog. LRAPA is doing good.
12/11/24	McKenzie River Reflections	Ken Engleman	Winter Burning Guidelines to minimize smoke impacting neighbors
12/11/24	KVAL and KMTR	News Staff	Delta Sand and Gravel Public comment open

## PUBLIC EVENTS AND OUTREACH

### ***Kingsford Title V Informational Meeting*** (Nov. 6<sup>th</sup>- Virtual)

Community members shared numerous concerns (18 comments submitted during public comment window) over the renewal of Kingsford’s Title V permit. In response, LRAPA hosted a virtual informational session at 5pm on Wednesday 11/6 to address questions and quell confusion about permit changes highlighted by the local news. The meeting was attended by 6 community members, most of whom lived in the vicinity of Kingsford. The biggest concern was the VOC emissions during the uncontrolled discharge window. There was an adjustment to the permit for extending the total amount of time Kingsford could operate to finish processing briquettes without the ACC in operation and finish applying solvents. The renewal permit allowed 4 additional hours in a single day for this process, increasing it from 8 to 12 hours. The total number of hours of uncontrolled discharge hours in a year did not change and remained 280 total hours.

***Pacific Northwest International Section of Air & Waste Mgt. Assoc. Conference*** (Nov. 13<sup>th</sup> to 15<sup>th</sup> in Eugene)



Christina, Max, and Travis helped plan and facilitate the 2024 PNWIS conference which was hosted at the Graduate Hotel in Eugene for over 200 guests. At the PNWIS conference attendees enjoyed technical sessions covering a variety of topics including air quality, water quality, waste management, sustainable development, green buildings, and many others. Additionally, there were opportunities to network with fellow air and waste professionals and learn about developing trends and best practices from across the region. LRAPA staff also arranged local tours for PNWIS participants to see LRAPA's air monitoring site or enjoy a guided tour of the new Knight research center on the U of O campus.

**Max Hueftle** was recognized at the conference with the Hawkeye Award. This award is presented to a professional who diligently enforces regulations in the PNWIS region. These "hawkeyes" are trained agency inspectors, industrial auditors, environmental activists, or others who take a "front line" approach to regulatory compliance.

**Travis Knudsen** was also recognized with an award known as the Bent Black Banana Award. This award is on the "lighter side" and is presented for some unusual contribution at the annual meeting, which in Travis' case it was his securing the very popular photo booth and DJ for the conference banquet celebration finale.

***Construction Contractors Board (CCB) Continuing Education Class on Asbestos*** (Nov. 20<sup>th</sup>)

Robbye Robinson, Morgan Kelley, Mandy Ramirez, and Matt Sorensen helped facilitate a continuing education class for over 35 Lane County contractors focused on asbestos rules and handling/disposing of asbestos. The focus of the class was to clarify the rules on asbestos handling/disposal, dispel any misunderstandings, and develop positive relationships between local contractors and LRAPA.

***Developing Youth Air Quality Curriculum w/ Southwest Willamette Solutions*** (Nov. 27<sup>th</sup>)

Matt Sorensen met with August Reed from Southwest Willamette Solutions to review their existing air quality educational curriculum used for Oakridge's outdoor school each year. Matt is looking to develop a strong repertoire of youth friendly air quality and STEAM based hands-on learning curriculum to help LRAPA increase youth and school awareness of air quality issues, our services, and availability to partner in the coming years.

***Northwest Air Quality Communicators RFP for Marketing Company*** (Dec. 2<sup>nd</sup>)

The NWAQC, a group that Travis has chaired since 2021 and will be stepping down from that role as of December. Matt Sorensen will take on representing LRAPA with this group. NWAQC issued an RFP for a contractor to design and deliver a technical solution system that enables the sharing of targeted messages, communications, artwork, and collaboration among NWAQC members. This solution should streamline social media messaging coordination and provide professional services to design and deliver new targeted messaging assets for air quality programs. The second aspect is creating assets to support specific air quality campaigns. These assets will be shared utilizing the technical solution system created in the first task. Matt helped evaluate the submitted proposals and continues to work with NWAQC and leveraging the assets created through the project to support our work locally.

**Lane County Air Quality Collaborative for Schools and Children Care Centers (Dec. 6<sup>th</sup>)**

A collaborative comprised of staff from Oregon Health Authority, Dept. of Human Services, Oakridge Air, and LRAPA are working together to support LRAPA grant efforts in Oakridge by helping improve indoor air quality in schools and childcare centers during wildfire events. The group's goal is to develop materials and guidance that is clear and simple enough for staff to implement during wildfire smoke events and help protect indoor air quality and the health of kids and staff. If the materials prove helpful in Oakridge, they will be shared with other school districts in Lane County and childcare facilities.



**LRAPA Springfield Office Remodel Tour & Holiday Party (Dec. 12<sup>th</sup>)**

LRAPA staff enjoyed touring the Springfield office mid remodel and seeing the significant progress made on the project and thanking the team working on the remodel. After the tour, staff met at 6<sup>th</sup> Street Grill for lunch and a white elephant gift exchange.

**City of Eugene Land Use Compatibility Statement (LUCS) Development LRAPA Presentation (Dec. 20<sup>th</sup>)**

Max Hueftle, Travis Knudsen, and Matt Sorensen delivered a presentation to City of Eugene staff working on refining the city's Land Use Compatibility approval process. The presentation highlighted LRAPA's process to initiate and process air permits in Lane County, which happens to require a LUCS from the appropriate municipality. The presentation also touched on Cleaner Air Oregon and how it helps protect citizens from hazardous air pollution. It was noted to City staff that there are impacts made by a business that may be regulated by LRAPA but those activities are not considered in their air permit. Those impacts include semi traffic, diesel emissions, sound, and some levels of odor. Each of these topics have been noted by community members when sharing their displeasure about potential businesses that LRAPA works with for an air permit but has no bearing on our approval of the permit and deserves consideration by the City when contemplating their LUCS. LRAPA is ready to work with partners to establish our role in meeting this challenge. City staff solicited LRAPA to share this information the Eugene City Council. LRAPA is agreeable to this consideration, though a date and time is TBD.



***Distribute Home Wood Heating Burn Wise materials to Midgeley's*** (Jan. 2<sup>nd</sup>)

LRAPA continues to provide useful resources to residents that purchase or upgrade their wood stoves at Midgeley's by providing over 200 burn wise home wood heating brochures.

***National Weather Service and Air Quality Coordination Meetings*** (Jan 7<sup>th</sup> to 8<sup>th</sup> in Salem)

Since 2018 and the major uptick in summer wildfires, there has been a collaboration between the national weather service, fire fighting agencies, and LRAPA/DEQ to review timely and accurate weather forecasts to craft smoke advisories and guidance during volatile summer wildfire season. The workgroup held the meeting in Salem over two days to review the 2024 summer efforts, look for places to improve, and discuss the upcoming wildfire season efforts and new tools. Matt Sorensen presented to the group on LRAPA's efforts in air quality management during the year in addition to our work with prescribed burning and wildfire smoke messaging.

**AGENCY GOALS AND UPDATES**

*In January 2022, the Board established the following goals to drive LRAPA's efforts in protecting public health, community well-being, and the environment. Below is an overview of each goal, accompanied by recent updates and milestones, with specific focus on activities in September 2024.*

**1. Oakridge/Westfir Air Quality Improvement**

Objective: Seek EPA approval to improve air quality in Oakridge/Westfir.

- Following the redesignation of Oakridge in September 2022, LRAPA continues to implement two targeted airshed grants in the area to further improve progress.
- LRAPA is implementing the EJG2G grant expanding the Oakridge Air program to include wildfire mitigation efforts.
  - o LRAPA has issued an RFP for contracted work under the grant, which closes mid-January. LRAPA hopes to select and award a contract for this work by the end of January.
  - o The Oregon Health Authority and LPCH are working to secure datasets for the health and morbidity study under this grant agreement.

**2. Internal Efficiency Enhancement**

Objective: Streamline internal processes and policies for improved efficiency.

- LRAPA has fully established its operations at the Lane County Public Service Building. Staff are splitting time between working from home and working at the Lane County Public Service Building.
- Rachelle Nicholas, the agency's new Administrative Manager has been engaged in shift and sorting through LRAPA's administrative data and working with the Executive Director on consolidating, updating, and organizing internal processes, policies, and procedures.
  - o Initial focus has been on the "administrative department" with explicit detail provided to Human Resources needs and practices.

**3. Pre-Budget Planning**

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

- The FY24 audit timeline has been extended from December 31, 2024, to March 31,

2025, with approval from the Oregon Secretary of State. This extension was necessary due to several compounding factors: the implementation of a new accounting system during FY24, turnover in executive and finance leadership, and the temporary relocation of administrative offices in early FY25. Reconciliation challenges between the old and new systems have been particularly significant, especially given the departure of key personnel who led the system implementation.

#### **4. Financial Stability Assessment**

Objective: Evaluate LRAPA's costs and explore funding sources for long-term stability.

- LRAPA's budget forecast and assumptions indicate the agency's finances are stable.
- LRAPA is preparing to bring a supplemental budget to the Board in the Spring of 2025. This supplemental budget is expected to be under 10%, not needing budget committee approval.
- Annual invoicing of fees to LRAPA's permitted sources was successful on October 1. Fees were due December 1. As of January 1, 2025, only four sources have neither provided payment nor confirmed payment.

#### **5. Website Redesign**

Objective: Improve LRAPA's website for better user access to air quality information.

- The website continues to be updated to accurately reflect current operations at the Organization, such as updates to the staff directory to reflect new hires.
- Facility Specific Cleaner Air Oregon webpages are in progress of being updated for existing sources and created for new sources.

#### **6. Community Engagement**

Objective: Increase interaction with communities to raise air quality awareness.

- LRAPA continues to engage collaboratively with various stakeholders and agencies on soil remediation activities concerning J.H. Baxter in West Eugene. LRAPA was supportive in connecting community members who observed overnight activities at the site and were concerned directly with the EPA for reflection, information, and details on the observed activities.

#### **7. Collaboration and Partnerships**

Objective: Strengthen relationships with local communities and industry for problem-solving.

- LRAPA participated in several regional collaborative groups and committee meetings in September. These included Lane Regional Climate Collaborative, Oakridge Area Fire Safe Council, and Lane County Healthy Housing Collaborative.

#### **8. Funding Source Diversification**

Objective: Seek new funding opportunities to support air quality programs.

- LRAPA has been informed by DEQ that governor's proposed budget does not include Agency cuts that would impact LRAPA. Our state support is currently proposed to remain consistent.

## **9. Airmetrics Enterprise Evaluation**

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

- Following the board's decision in late 2023, Airmetrics has ceased all operations. LRAPA provided a 30-day notice to terminate the lease on the Airmetrics warehouse space, which concludes on July 24, 2024. LRAPA has fully vacated the space and removed all references to Airmetrics from its website in early June 2024.

## **10. Complaint Intake Process Improvement**

Objective: Enhance the process for receiving and responding to air quality complaints.

- LRAPA continues to make improvements to our complaint intake and response processes, as new staff settle into the workflow. LRAPA's focus on complaints is now centered on the quality of information retained and stored in the database.

## **11. Regulatory Engagement**

Objective: Stay updated on air quality regulations through engagement with relevant organizations.

- LRAPA successfully implemented the annual 4% fee increases for ACDP and Asbestos Notification fees, as well as a 3% increase for Cleaner Air Oregon (CAO) fees, effective July 1, 2024, ensuring the agency's ability to continue its critical air quality work and adapt to emerging challenges.
- LRAPA is implementing a state-mandated fee increase for Gasoline Dispensing Facilities, raising the annual fee from \$201 to \$605 and the Cleaner Air Oregon annual fee from \$52 to \$156, effective in 2025, to support more stringent air quality regulations. This fee adjustment reflects the reclassification of Gasoline Dispensing Facilities from ACDP Fee Class 5 to Fee Class 4 by the Oregon Department of Environmental Quality, necessitating additional regulatory oversight and work to further reduce air pollution from gasoline vapors.
- LRAPA plans to review fee increases set by rule with the Board in April of 2024. LRAPA will engage with the regulated community to assure awareness of this engagement with the Board, identifying the opportunity to participate publicly at the meeting.

## **12. Succession Planning and Staff Training**

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

- Following a Permit Writer's departure in October, LRAPA is strategically evaluating this vacant position before recruitment. The organization is considering restructuring the role to potentially include smoke management responsibilities and technical services support. This approach would both address operational needs and create succession planning opportunities through enhanced understanding of the position's duties.
- Consideration on organizational structure are still underway, with any identified shifts to be implemented over 2025.

## **TENTATIVE UPCOMING LRAPA BOARD AGENDA ITEMS**

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

### **December 2024 – No Meeting**

### **February 2025**

- Nominations/Appoint Board Chair and Vice-Chair
- Nominations/Appoint new Budget Committee Members and Budget Officer
- Budget Forecast
- Remodel Update

### **March 2025**

- First Budget meeting, FY 25-26, review budget
- Remodel Update

### **April 2025**

- Second Budget meeting, FY 25-26, approve budget
- Board Review of annual fee increases set by rule

### **May 2025**

- Public Hearing and adoption of approved budget for FY 25-26
- Executive Director performance evaluation, contract renewal.
- Dashboard Report

### **June 2025**

- Outdoor Burning update
- LRAPA open house