



AGENDA

LANE REGIONAL AIR PROTECTION AGENCY

CITIZENS ADVISORY COMMITTEE MEETING

TUESDAY APRIL 29, 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

LRAPA

1010 Main Street

Springfield, Oregon 97477

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

1. 12:00 Call to Order/Agenda Review
2. 12:05 Public Participation
3. 12:10 Board Meeting Overview
4. 12:20 Enforcement Data & Communication (Final Review)
5. 12:50 Roundtable
6. 1:00 Adjournment

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**CITIZENS ADVISORY COMMITTEE
MEETING MINUTES
MARCH 25, 2025
MEETING VIA ZOOM / LRAPA OFFICE, SPRINGFIELD OREGON**

ATTENDANCE	
COMMITTEE PRESENT:	LRAPA STAFF PRESENT:
Kelly Wood, Chair	Travis Knudsen, Executive Director
Evelina Davidova-Kamis, Vice-Chair	Matt Sorensen, Public Affairs & Project Manager
Jim Daniels	Heather Gravelle, Administrative Assistant
Michael Koivula	
Ben Larson	
Paul Metzler	
COMMITTEE ABSENT/EXCUSED:	OTHERS PRESENT:
Chris Cline	None.
Peter Dragovich	
Teresa Roark	

AGENDA	ACTION
REGULAR MEETING	
1. Call to Order/Agenda Review.	Chair Jim Daniels convened the regular meeting at noon.
2. Public Participation.	None.
3. Board Meeting Overview.	Chair Daniels and Travis Knudsen , Executive Director, provided updates from the March 13, 2025 Board meeting.
4. Elect Chair & Vice-Chair.	<p>Kelly Wood stated that she had spoken to Jim regarding the position and that she would be willing to serve as Chair.</p> <p>Kelly Wood self-nominated for the position of Chair of the CAC. The nomination was seconded by Paul Metzler and passed unanimously.</p> <p>Evelina Davidova-Kamis self-nominated for the position of Vice-Chair of the CAC. The nomination was seconded by Kelly Wood and passed unanimously.</p>

<p>5. Enforcement Data Review & Communication.</p>	<p>Mr. Knudsen informed the committee that the Directors Report was being revamped to more directly align with the updated Board goals and would also incorporate feedback received from the CAC on enforcement and complaint data.</p> <p>The Committee discussed the enforcement data highlighting the need for more detailed information, particularly regarding industry sources. Members proposed adding a new section in the Directors Report to specify the source or cause of each enforcement action and the permit condition that wasn't being met.</p> <p>Additionally, the Committee considered separating odor and dust complaints from other complaint categories for clearer data reporting. Members also emphasized the need to identify when multiple complaints come from a single source, to distinguish between one person submitting multiple complaints versus multiple individuals raising concerns.</p> <p>Staff agreed to incorporate the feedback for CAC review before making a final recommendation to the Board.</p>
<p>6. Roundtable.</p>	<p>Chair Wood discussed the potential challenges faced by the Forest Service due to administrative staff cuts.</p> <p>Mr. Koivula brought up the issue of air quality in the area. Mr. Knudsen explained that while the community's air quality meets regulatory health standards, residents are still experiencing diminished air quality during the wildfire season due to the smoke.</p> <p>Matt Sorensen, Public Affairs & Project Manager, announced an open house event on May 8th from 2:00 - 4:30 pm to celebrate the agency's remodel and Air Quality Awareness Week.</p>
<p>7. Adjournment.</p>	<p>Chair Wood adjourned the Committee meeting at 1:00 p.m.</p>

(Minutes recorded by Heather Gravelle)



Director's Report for March 2025

Meeting Date: April 10, 2025
Department: Director's Office
www.lrapa.org

Agenda Item No. 12
Staff Contact: Travis Knudsen
541-736-1056 ext. 217

I. EXECUTIVE HIGHLIGHTS

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

LRAPA successfully completed the move back to our remodeled Springfield office this month, with minimal disruption to operations. Staff are now fully settled in the renovated space, which provides improved functionality for our regulatory work. The agency is making good progress with FY 2025-26 budget planning, with revisions completed following the initial budget committee meeting earlier in the month.

Lane County experienced favorable air quality conditions in March, with 26-31 "Good" AQI days and only 5 "Moderate" days at monitoring locations. No days exceeded "Moderate" levels, reflecting effective regulatory programs and seasonal conditions. Permitting activities remain steady with 20 permits currently in queue, and our total permit backlog stands at 12%, below our target of 20%. The Rosboro Company and Costco Wholesale Corporation permits were placed on public notice this month.

The agency strengthened community partnerships through multiple outreach initiatives, including Matt Sorensen's engagement with Springfield Rotary and the initiation of a Spanish language public service message with 97.7 La Que Buena about asbestos dangers. Preparation work with Willamalane for the 2025 prescribed burn permit under the River to Ridges banner is also underway.

A significant challenge emerged on March 21st when LRAPA received official notice of termination for the nearly \$1M Environmental Justice Government-to-Government (EJG2G) Grant that would have supported home hardening and smoke-proofing for approximately 30 Oakridge area homes. In response, Travis Knudsen informed outreach to Lane County's federal legislators to inform them of the impacts on Eastern Lane County communities.

Looking ahead, key priorities include preparing for the May Budget Committee meeting, planning the LRAPA Open House, and assessing the timeframe for conducting the Executive Director's performance evaluation process.

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 March 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).*

Site	Date	Max AQI	Pollutant
Eug/Spfld	1-Mar-25	56	PM
Oak	8-Mar-25	62	PM
CottGrv	6-Mar-25	46	PM

AQI	Eug/Spfld	Oak	CottGrv	AQI Range	PM2.5 Range, ug/m3	Ozone Range, ppb
Good	26	26	31	0-50	0-9	0-54
Moderate	5	5	0	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 (March 2025)

Attachment No. 2: PM2.5 index charts for Lane County (March 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.*

March 1, 2025, to March 31, 2025
Smoke complaints: 21
20 - Outdoor Burning 1 - Home Wood Heating
Industry: 03
1 - International Paper 1 - Pacific Recycling 1 - WG Peterson Woodworking
Miscellaneous: 05
2 - Asbestos 2 - Unknown 1 - Fugitive Dust
Total: 29

Category	Year-To-Date↓					
	2020	2021	2022	2023	2024	2025
Dust	17	26	12	7	8	1
Ag Burning / Spraying	2	7	2	3	3	0
General Air Quality	4	8	1	25	32	17
Home Wood Heating	74	57	67	52	39	27
Industry	100	336	198	97	75	32
Outdoor Burning	423	243	292	254	253	67
Slash Burning	12	10	6	12	9	0
Miscellaneous	59	40	102	72	103	41
Unknown	74	71	45	65	79	34
Total:	765	798	725	587	601	219

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 March 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

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

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
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

97.7 La Que Buena Meeting (Mar. 14th, Virtual)

Matt Sorensen met with Brisa Yow, the Sales Director at 97.7 La Que Buena, Eugene area's only FM Spanish radio station; to research prices and options to produce a public service message educating listeners about the dangers of asbestos, especially for those working in demolition and construction in homes built in 2004 or older. There will be a commercial made and aired starting in late March for 10 months.

Springfield Rotary (Mar. 19th, Elks Lodge)

Matt Sorensen attended a Springfield Rotary meeting to inquire about joining the club and becoming an active member. Michelle and Roger Weber hosted Matt and Merlyn Hough, former LRAPA Executive Director, is the current Rotary President. There are numerous active and engaged community members in the Springfield Rotary Club and Matt will be joining as a member. Being an active member is a great way to give back to the community and share LRAPA's work with others in our region.

J.H. Baxter Communication Meeting (Mar. 20th, Virtual)

Matt Sorensen is representing LRAPA in this group. This monthly meeting between EPA, DEQ, and LRAPA is held to discuss ongoing cleanup efforts at J.H. Baxter. EPA will become the lead agency as they try to get the site approved as a superfund site after the Time Critical Removal Action. The LRAPA approved asbestos work is complete on the three large retort tanks. The tanks themselves have also been removed. Visit https://response.epa.gov/site/site_profile.aspx?site_id=15559 for details and pictures on the project.

Notification of EJG2G Grant Termination (Mar. 21st, Email)

On Friday 3/21/25 LRAPA received an official termination notice from the EPA that LRAPA's nearly \$1M Environmental Justice Government to Government Grant (EJG2G) to support home hardening and smoke-proofing interventions for approximately 30 Oakridge area homes, particularly low-income, senior, and disabled residents was canceled. The grant would have also funded implementation of a community-developed Wildfire Smoke Response Plan, a seasoned firewood program for vulnerable residents, health research on the impacts of wildfire smoke in rural Eastern Lane County and cost to insurers, as well as create a best practices toolkit to help similar communities address these challenges. All expenses incurred for activities conducted by LRAPA or grant collaborators will be paid by the grant through 3/21/25.

Legislative Outreach to Sen. Merkley, Sen. Wyden, and Rep. Hoyle (Mar. 25th, Email)

Travis Knudsen sent individual emails to each of Lane County’s federally elected officials to notify and educate them about the cancellation of LRAPA’s EJG2G grant and the impacts it will have on Eastern Lane County and specifically those in Oakridge.

Boys & Girls Clubs of Emerald Valley Donation (Mar. 25th, LRAPA Office)

The Boys & Girls Clubs of Emerald Valley was contacted by Matt Sorensen about furniture items and storage cabinets available for donation to local nonprofits due to LRAPA’s remodel and move. Two staff from the Club came to the LRAPA office to pick up over 6 furniture items that will be utilized to help 450+ local youth at all three service locations (Bethel, River Road, and Eugene).

Rivers to Ridges Permit Preparation (Mar. 28th, Virtual)

Colleen Wagstaff, Travis Knudsen, and Matt Sorensen met with Bryce Izlar and Jesse Larson from Willamalane to begin preparation for the 2025 prescribed burn permit under the River to Ridges (R2R) banner. The R2R collaborative involves over 6 separate agencies, three cities, Lane County, and numerous fire districts. The goal of this meeting was to ensure R2R could streamline and organize the burn permit application to ensure the most efficient process for those collecting data and for the team preparing the permit at LRAPA.

Northwest Air Quality Communicators (NWAQC) Executive Committee Meeting (Apr. 2nd, Virtual)

Matt Sorensen met with the executive leadership of NWAQC which includes Dan Nelson from Olympic Region Clean Air Agency, Patty McElroy from Puget Sound Clean Air Agency, and Lisa Woodard from Spokane Clean Air Agency. NWAQC is a co-op of air quality agencies for sharing and leveraging their marketing and communication tools/messaging to help improve communication and best practices in the AQ public communications field. Starting December ’24, NWAQC initiated use of a new clearinghouse website utilizing Echo Northwest to keep all assets and materials for the NWAQC members available to incorporate into their local marketing efforts. This partnership helps LRAPA leverage the knowledge and resources of other air agencies for things like Air Quality Awareness Week and Smoke Ready Week.

Presentation to Northwest Interagency Partnership for Sustainable Communities (NIPSC) (Apr. 3rd, Virtual)

The NIPSC is comprised of a federal interagency collaboration from Alaska, Idaho, Oregon, and Washington and specific agencies including EPA, FEMA, HUD, DOT, USDA, DOI, NOAA, SBA, and DOL, among others. Their mission: ‘To foster partnerships and information sharing to promote sustainable community development in the Pacific Northwest by leveraging interagency collaboration and resources.’

Matt Sorensen presented on LRAPA’s work in Oakridge and how LRAPA’s initial efforts in air quality improvement and wood stove swap outs through the TAG grant was leveraged, thanks to the leadership of Sarah Altimus-Pope and the Southwest Willamette Solutions team, into a much bigger effort known as Oakridge Air. Oakridge Air’s collaboration and resource sharing group comprised of LRAPA, Oakridge, SWS, Lane Electric, and Brock’s Wood Lot is a large part of what makes it special. Collaboration is a core tenant of the Oakridge Air approach and has helped shape the program to meet local needs like performing heat pump installations that help improve air quality, while also helping battle heat in the summer, improve home values, and protect indoor air quality for homeowners during wildfire season. Thanks to this collaborative approach, Oakridge Air has leveraged their federal funds for State of Oregon grant funds from Healthy Homes to expand their services in Oakridge.

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	2	11	13
Modifications	1	2	3
Constructions	-	1	1
General Title V	-	-	-
Terminated Permits	-	-	-

Station Sources Permits Issued, Year-to-Date

- Title V Operating Permits: 1
- Air Contaminant Discharge Permit: 9

Permits on public notice from March 1 to March 31, 2025		
Source Name	Reason for Public Notice	Type of Permit
Rosboro Company, LLC – Springfield Facility	Renewal of Title V Operating Permit	Title V permit renewal. Off public notice 4/25/25
Costco Wholesale Corporation (Costco Fuel Facility Loc. 17)	Renewal of Standard ACDP	Standard ACDP renewal. Off public notice 4/25/25

Permit Backlog as of March 31, 2025			
Permit Type	Permits by Type	Permits Extended Administratively	Percentage of Total (%)
Title V	15	1	7%
Standard	24	5	21%
Simple	27	2	7%
Total	66	8	12%

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	107
School Asbestos Abatement Notices (NESHAP)	25	20	16	17	21	2
Number of Asbestos Abatements Inspected (AHERA)	93	104	115	91	109	22

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.

March 1, 2025 to March 31, 2025					
Category of Violation	New	Follow-Up Action	Pending	Closed	Total
Asbestos	-	1		6	7
Industrial	-	-	3	3	6
Outdoor Burning	-	-	-	1	1
Fugitive Dust	-	-	-	-	-
Home Wood Heating	-	-	-	-	-
Totals	-	1	3	10	14

Attachment No. 3: March 2024, Enforcement Actions Detail Report.

	Year-To-Date↓						
	2019	2020	2021	2022	2023	2024	2025
Notices of Non-compliance and Warnings	55	15	21	24	19	9	7
Notices of Violation with Civil Penalties	37	26	17	24	15	5	6

NEW/OPEN ENFORCEMENT ACTIONS DETAIL REPORT
3/1/2025 -- 3/31/2025
Report of open actions initiated since last report

NEW ENFORCEMENT ACTIONS: None.

PENDING (Enforcement actions issued prior to 3/1/2025 with no reporting action in the current reporting period):

1. 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 5/30/2024
 - C. Subsequent Action: PENDING
 - 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 9/6/2024
 - B. Subsequent Action: NCP #2024-3908 (\$8400) issued 9/6/2024: request for reduction approved to \$4,800 with a payment plan of \$100 per month beginning April 1, 2025.
 - D. Resolution: PENDING
3. 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 7/31/2024
 - C. Subsequent Action: PENDING

Attachment No. 3: Enforcement Action Detail Report

- D. Resolution: PENDING
- 4. 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 under review
 - D. Resolution: PENDING

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

- 1. FOWLKES, STEVE & JOHN A. RANKIN (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

Attachment No. 3: Enforcement Action Detail Report

plastic bags with a minimum thickness of 6 mil., or fiber or metal drum. Containers must be labeled as follows: (i) the name of the asbestos waste generator and the location where the asbestos waste was generated; and (ii) a warning label that states: DANGER Contains Asbestos Fibers Avoid Creating Dust Cancer and Lung Disease Hazard Avoid Breathing Airborne Asbestos Fibers Alternatively, warning labels specified by 29 CFR 1926.1101(k)(7)(8/19/94) may be used; 43-105(19)(E)- All asbestos-containing waste material must be deposited as soon as possible by the waste generator at: (1) An asbestos-containing waste disposal site authorized by the Department and operated in accordance with the provisions of this rule;

- B. Initial Action Taken: NON #3877 issued 3/6/2023
 - B. Subsequent Action: NCP #2023-3877 (\$10,400) issued 3/6/2023: request for reduction approved and reduced to \$5,200 on 04/19/2023 with a payment schedule of \$400 per month and is on schedule with payments - 5/31/24 paid \$4,000 - paid 3/6/2025
 - D. Resolution: CASE CLOSED on 3/6/2025
2. 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 outdoor burning letter permit.
 - B. Initial Action Taken: NON #3880 issued 4/11/2023
 - B. Subsequent Action: NCP #2023-3880 (\$3,650) issued 4/11/2023: No response or payment has been received, a default order judgment for a lien on the property filed with Lane County 3/24/2025
 - D. Resolution: CASE CLOSED on 3/24/2025
3. 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. The Permittee submitted testing results relative to conditions 5.1.a and 5.1.b on February 4th, 2020, and therefore was required to have testing conducted by February 4th, 2023. Condition 7.1.c of the permit requires notification of upcoming testing to be submitted to LRAPA and condition 7.2 requires test results to be submitted to LRAPA no later than 30 after testing has occurred.
 - B. Initial Action Taken: NON #3886 issued 4/25/2023
 - C. Subsequent Action: NCP #2023-3886 (\$2,250) issued 6/12/2023: No response or payment has been received, a default order judgment for a lien on the property filed with Lane County 3/24/2025.

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- D. Resolution: CASE CLOSED on 3/24/2025
- 4. SEALS, MARK (ELMIRA)
 - A. Violation: Outdoor burning of prohibited materials (metal, plastic, rubber, etc.).
 - B. Initial Action Taken: NON #3888 issued 6/13/2023
 - C. Subsequent Action: NCP #2023-3888 (\$550) issued 7/31/2023: No response or payment has been received, a default order judgment for a lien on the property filed with Lane County 3/24/2025.
 - D. Resolution: CASE CLOSED on 3/24/2025
- 5. WOOLMAN, TIM (VENETA)
 - A. Violation: Allowing for the burning of prohibited materials (plastics).
 - B. Initial Action Taken: NON #3898 issued 3/1/2024
 - C. Subsequent Action: NCP #2024-3898 (\$850) issued 3/7/2024: No response or payment has been received, a default order judgment for a lien on the property filed with Lane County 3/24/2025.
 - D. Resolution: CASE CLOSED on 3/24/2025
- 6. 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 9/6/2024
 - C. Subsequent Action: NCP #2024-3907 (\$275) issued 9/6/2024: No response or payment has been received, a default order judgment for a lien on the property filed with Lane County 3/24/2025.
 - D. Resolution: CASE CLOSED on 3/24/2025
- 7. SPADES ENVIRONMENTAL (EUGENE)
 - A. Violation: Conducted an asbestos abatement of asbestos containing material (ACM) without a proper enclosed area [LRAPA Title 43 Section 43-015(11)(F)(4)] and open accumulation of friable asbestos containing materials [LRAPA Title 43 Section 43-010(1)] at 2155 Brittany Street, Eugene, Oregon. This resulted in an open accumulation of ACM outside of the containment area.

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- B. Initial Action Taken: NON #3911 issued 1/10/2025
 - C. Subsequent Action: NCP #2024-3911 (\$1,800) issued 1/10/2025: request for reduction under review approved and reduced to \$1,000 due 3/21/2025 - paid
 - D. Resolution: CASE CLOSED on 3/6/2025
8. CHRISTIANSEN, MICHAEL (CRESWELL)
- A. Violation: Respondent caused, allowed, initiated or maintained outdoor burning at a time when outdoor burning was prohibited and caused, allowed, initiated or maintained the outdoor burning of prohibited materials. It is alleged that the materials burned were under the ownership or control of Respondent. It is alleged that the outdoor burning was conducted on property under the ownership or control of Respondent located at 33830 Orchard Avenue, Creswell, OR. The alleged outdoor burning was in violation of LRAPA Rules and Regulations, Title 47, "Outdoor Burning".
 - B. Initial Action Taken: NON #3912 issued 1/10/2025
 - C. Subsequent Action: NCP #2024-3912 (\$1,150) issued 1/10/2025: No response or payment has been received, a default order judgment for a lien on the property filed with Lane County 3/24/2025.
 - D. Resolution: CASE CLOSED on 3/24/2025
9. ATEZ, INC. (CRESWELL)
- A. Violation: Respondent conducted an asbestos abatement and failed to adequately clean the project site to assure removal of all asbestos debris at conclusion of the abatement project and failed to provide property warning signage posted at the project site.
 - B. Initial Action Taken: NON #3913 issued 2/25/2025
 - C. Subsequent Action: NCP #2024-3913 (\$1,400) issued 2/25/2025 – paid 3/9/2025
 - D. Resolution: CASE CLOSED on 3/9/2025
10. 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

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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 11/3/2022
- C. Subsequent Action: NCP #2022-3872 (\$3,000) issued 12/8/2022: submitted the test results over 12 months late, therefore the request for reduction was not approved. Reports submitted 2/14/23 and 6/7/23. No response or payment has been received, a default order judgment for a lien on the property filed with Lane County 3/24/2025.
- D. Resolution: CASE CLOSED on 3/24/2025

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	6.0	0.0
Operations	6.0	2.0
Finance	3.0	0.0
Technical services	4.0	0.0
Total	19.0	2.0
<i>Agency at 90% of staffing capacity</i>		

Staff Professional Development, Year-to-Date			
Training	Participation	Completion Date	Provider
Budget Law Training	2	February	Oregon Department of Revenue
Basic Inspector Training	3	March	WESTAR
<i>Intro to Environmental Enforcement training</i>	2	<i>April</i>	<i>Western States Project</i>
<i>Essential Skills Workshop</i>	1	<i>April</i>	<i>Springfield Chamber: Work ready</i>

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:** Our central database system is undergoing background updates to version 3.0. These improvements will enhance permit tracking, complaint management, and reporting capabilities.
- **Remodel Move-in:** Following the completion of our office remodel, staff have returned to the Springfield office. Work continues on unpacking storage and organizing document systems for more efficient operations. This reorganization provides an opportunity to improve file management and accessibility.
- **Meeting Technology:** Installation of equipment to facilitate hybrid meetings in the board room is nearing completion. This technology will improve accessibility for board meetings, staff training, and stakeholder

engagement, supporting our transparency and communication goals.

- **Standard Operating Procedures:** 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.

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 February 2025 financial update (Agenda number 7).

Line Items to Watch Closely: These line items are above 90% of the expected budgeted spending to date. For example, if 67% of the year has elapsed, anything above 61% will be listed.

- **The General Fund Capital Outlay**, expenditures currently total 63% of budgeted spending and is aligned with expectations as we approach the completion of our remodel project, which will fully utilize this budget line by fiscal year-end.
- **The Special Fund (Title V) Materials & Services**, expenditures have reached 74% of budgeted spending, but only minimal further expenses are expected for FY’25.

Summary of Expenditures to Date: Although **67%** of the year has elapsed **as of 2/28/25**, spending is currently below that threshold in each of the LRAPA funds. These are the categories we must consider when asking the question “Did we come in on or below our budget for the year?”:

- **General Fund** Total Actual Expenditures as a % of Budgeted Annual Expenditures: **61%**
- **Special Revenue Fund** Total Actual Expenditures as a % of Budgeted Annual Expenditures: **56%**
- **Grant Fund Total** Actual Expenditures as a % of Budgeted Annual Expenditures: **26%**
- **All Funds Consolidated** Actual Expenditures as a % of Budgeted Annual Expenditures: **48%**

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 2025
Audit	In progress	Expected July 2025

Fiscal Year: 2025-2026	Status	Completion Date
Budget	Proposed, March 2025 Revised on 3/26/25	Expected May 2025
Audit	To be scheduled	Expected December 2025

VI. BOARD CALENDAR

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

2025	2026
January <ul style="list-style-type: none"> Preview upcoming appointments on board and committees. Oakridge Air update Remodel update January; Work Session <ul style="list-style-type: none"> Discussion of Partner Dues Discussion of Board Goals Discussion of Board Meeting Schedule February <ul style="list-style-type: none"> 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 <ul style="list-style-type: none"> Budget Committee Meeting for FY'26 Authorization for Public Comment on SB 5520 Board Goals Approval Federal Grant Status Update Remodel Final Update April <ul style="list-style-type: none"> Budget Committee Meeting for FY'26; Approve Budget Annual By Rule Fee Schedule Executive Director's Performance Evaluation Process Public Comment SB5520; Report May <ul style="list-style-type: none"> Public Hearing of FY'26 Approved Budget, Board Adoption Executive Session: Director Performance Evaluation Oakridge Air Update Federal Grants Status Update LRAPA Open House June <ul style="list-style-type: none"> Outdoor Burning Season Review FY'24 Audit Report & Presentation Federal Grants Status Update July <ul style="list-style-type: none"> Rulemaking Review Federal Grants Status Update August <ul style="list-style-type: none"> No Meeting September <ul style="list-style-type: none"> Review Legislative Session and state general fund decisions. Review Local Partner Dues Calculation for FY'27. Wildfire Smoke Management Season Update October <ul style="list-style-type: none"> Approve Local Dues Calculation for FY'27. Wildfire Smoke Management Season Update/Review Outdoor Burning Season Update November <ul style="list-style-type: none"> Audit Update, FY'25 Home Wood Heating Season Update December <ul style="list-style-type: none"> No Meeting 	January <ul style="list-style-type: none"> Preview upcoming appointments on board and committees. Oakridge Air update Review budget forecast for FY'2026-2029 February <ul style="list-style-type: none"> 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 <ul style="list-style-type: none"> Budget Committee Meeting for FY'26 April <ul style="list-style-type: none"> Budget Committee Meeting for FY'27; Approve Budget Executive Director's Performance Evaluation Process May <ul style="list-style-type: none"> Public Hearing of FY'27 Approved Budget; Board Adoption Executive Session: Director Performance Evaluation Oakridge Air Update June <ul style="list-style-type: none"> Outdoor Burning Season Review July <ul style="list-style-type: none"> Rulemaking Review August <ul style="list-style-type: none"> No Meeting September <ul style="list-style-type: none"> Review Legislative Short Session. Review Local Partner Dues Calculation for FY'28. Wildfire Smoke Management Season Update October <ul style="list-style-type: none"> Approve Local Dues Calculation for FY'28. Wildfire Smoke Management Season Update/Review Outdoor Burning Season Update November <ul style="list-style-type: none"> Audit Update, FY'27 Home Wood Heating Season Update December <ul style="list-style-type: none"> 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
<ul style="list-style-type: none">- % data completeness for monitoring network (target: >95%)- Timeliness of data reporting to the public and EPA (target: 100% on schedule)	<ul style="list-style-type: none">- % 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
<ul style="list-style-type: none">- 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)	<ul style="list-style-type: none">- 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
<ul style="list-style-type: none">- 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)	<ul style="list-style-type: none">- 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
<ul style="list-style-type: none">- Reserve fund supporting annual operating budget (target: 4 months)- Budget variance (target: within 10% of planned)	<ul style="list-style-type: none">- Number of financial reports provided to Board & public (target: monthly to Board)- Audit completed before state deadline (target: Dec. 31)