

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	15	17
Modifications	1	5	6
Constructions	-	-	-
Terminated Permits	-	-	-

Stationary Sources Permits Issued, Year-to-Date

- Title V Operating Permits: 1
- Air Contaminant Discharge Permit: 12

Permits on public notice from April 1 to April 30, 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
Emerald Forest Products, Plant #1	Renewal of Standard ACDP and Toxic Air Contaminant Permit Addendum (CAO)	Standard ACDP renewal. Off public notice 5/23/25.

Permit Backlog as of April 30, 2025			
Permit Type	Permits by Type	Permits Extended Administratively	Percentage of Total (%)
Title V	15	1	7%
Standard	24	4	17%
Simple	27	1	4%
Total	66	8	9%

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	135
School Asbestos Abatement Notices (NESHAP)	25	20	16	17	21	3
Number of Asbestos Abatements Inspected (AHERA)	93	104	115	91	109	34

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.

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

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

	2020	2021	2022	2023	2024	2025
Notices of Non-compliance and Warnings	15	21	24	19	9	7
Notices of Violation with Civil Penalties	26	17	24	15	5	7

NEW/OPEN ENFORCEMENT ACTIONS DETAIL REPORT
4/1/2025 -- 4/30/2025
Report of open actions initiated since last report

NEW ENFORCEMENT ACTIONS: None.

ACTIONS PERFORMED (NON issued prior to 04/01/2025 with current action in reporting period):

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

PENDING (Enforcement actions issued prior to 4/1/2025 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
 - E. Source Type: METAL FABRICATION AND PAINTINGGG
 - F. Initiated By: INSPECTIONS

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
- C. Subsequent Action: NCP #2024-3908 (\$8,400) issued 9/6/2024; request for reduction approved and reduced to \$4,800 with a payment plan of \$100 beginning May 1, 2025.
- D. Resolution: PENDING
- E. Source Type: ASBESTOS
- F. Initiated By: INSPECTION

3. INTERNATIONAL PAPER (SPRINGFIELD)

- A. Violation: Between January 23, 2024, and June 30, 2024, International Paper Company failed to implement monitoring required by Title V Operating Permit #208850, issued January 23, 2024. It is alleged that the additional monitoring requirements were not implemented when the permit was issued with the required monitoring was not performed for the first (6) six months of 2024 (1/23/2024 - 6/30/2024).
- B. Initial Action Taken: NON #3920 issued 1/30/2025
- C. Subsequent Action: NCP #2024-3920 (\$9,000) issued 1/30/2025; request for reduction and Supplemental Environmental Project (SEP) under review
- D. Resolution: PENDING
- E. Source Type: PAPER & PULP MILL
- F. Initiated By: SELF REPORTING

CLOSED ENFORCEMENT CASES Enforcement Actions issued prior to 3/1/2025 and closed in the current reporting period): None.