

III. MAINTAINING REGULATORY EXCELLENCE

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

III.A. Stationary Source Permitting Progress & Efficiency

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

Permitted Sources

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

Permits in Queue			
Category of Permit Activity	Title V	ACDP	Total In Queue
New	1	2	3
Renewals	1	15	16
Modifications	2	7	9
Constructions	-	-	-
Terminated Permits	-	-	-

Stationary Sources Permits Issued, Year-to-Date

- Title V Operating Permits: 2
- Air Contaminant Discharge Permits: 14

Permits on public notice from May 1 to May 31, 2025		
Source Name	Reason for Public Notice	Type of Permit
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. Issued 5/30/25.
Emerald People's Utility District - Short Mountain Generation Facility	Initial Title V Operating Permit	Title V Operating Permit. Off public notice 6/24/25.

Permit Backlog as of May 31, 2025			
Permit Type	Permits by Type	Permits Extended Administratively	Percentage of Total (%)
Title V	15	0	0%
Standard	24	3	13%
Simple	27	1	4%
Total	66	4	5%

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	168
School Asbestos Abatement Notices (NESHAP)	25	20	16	17	21	3
Number of Asbestos Abatements Inspected (AHERA)	93	104	115	91	109	44

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	2	-	1	-	3
Industrial	1	2	1	-	4
Outdoor Burning	2	-	-	-	2
Fugitive Dust	-	-	-	-	-
Home Wood Heating	-	-	-	-	-
Totals	5	2	2	-	9

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	12
Notices of Violation with Civil Penalties	26	17	24	15	5	11

NEW/OPEN ENFORCEMENT ACTIONS DETAIL REPORT
5/1/2025 -- 5/31/2025
Report of open actions initiated since last report

NEW ENFORCEMENT ACTIONS:

1. ATEZ, INC. (EUGENE)
 - A. Violation: Conducted and completed a friable asbestos abatement project at Cascade Manor without performing air clearance prior to leaving the site.
 - B. Initial Action Taken: NON #3923 issued 05/02/2025
 - C. Subsequent Action: NCP #2025-3923 (\$4,865) issued 05/02/2025: request for hearing or reduction, reduction settlement under review
 - D. Resolution: PENDING
 - E. Source Type: ASBESTOS
 - F. Initiated By: INSPECTION
2. VALLEY ENVIRONMENTAL DBA VAE LLC (LANE COUNTY)
 - A. Violation: Failure to notify LRAPA of date and startup at least 14 days prior to the relocation of a stationary source in accordance with condition 12.6 of Permit No. AQGP-013 General ACDP #208670.
 - B. Initial Action Taken: NON #3927 issued 05/02/2025
 - C. Subsequent Action: NCP #2025-3927 (\$3,200) issued 05/02/2025: request for reduction under review
 - D. Resolution: PENDING
 - E. Source Type: PORTABLE ACI
 - F. Initiated By: REPORT REVIEW
3. HARMON, SHARON (EUGENE)
 - A. Violation: Outdoor burning in a burn barrel.
 - B. Initial Action Taken: NON #3929 issued 05/22/2025

- C. Subsequent Action: NCP #2005-3929 (\$550) issued 05/22/2025:
 - D. Resolution: PENDING
 - E. Source Type: OUTDOOR BURNING
 - F. Initiated By: COMPLAINT
4. SIMMONS, STEVE (SPRINGFIELD)
- A. Violation: Respondent allowed, initiated or maintained the outdoor burning of prohibited materials including furniture (couches), insulation, metal, wires, household garbage plastic, etc., at the site on multiple days and the Mohawk Valley Fire Department was dispatched to extinguish the illegal outdoor burning.
 - B. Initial Action Taken: NON #3931 issued 05/28/2025
 - C. Subsequent Action: PENDING
 - D. Resolution: PENDING
 - E. Source Type: OUTDOOR BURNING
 - F. Initiated By: FIRE DEPARTMENT REFERRAL
5. EMPIRE PROPERTY MANAGEMENT (EUGENE)
- A. Violation: Respondent allowed open accumulation of friable asbestos containing materials in a rental property.
 - B. Initial Action Taken: NON #3932 issued 05/28/2025
 - C. Subsequent Action: PENDING
 - D. Resolution: PENDING
 - E. Source Type: ASBESTOS
 - F. Initiated By: COMPLAINT

ACTIONS PERFORMED (NON issued prior to 04/01/2025 with current action in 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 05/30/2024
 - C. Subsequent Action: NCP #2024-3903 (\$6,800) issued 05/22/2025:
 - D. Resolution: PENDING
 - E. Source Type: METAL FABRICATION AND PAINTINGG
 - F. Initiated By: INSPECTIONS
2. AURORA INNOVATIONS / HYDROFARM (EUGENE)
 - A. Violation: Failure to submit 2023 semi-annual report required by Condition #28 in the ACDP #200053. The 2023 semi-annual report was due February 15, 2024; failure to submit their 2023 ATEI report by July 1, 2024.
 - B. Initial Action Taken: NON #3910 issued 7/31/2024
 - C. Subsequent Action: NCP #2024-3910 (\$2,500) issued 04/23/2025: request for reduction under review
 - D. Resolution: PENDING
 - E. Source Type: FERTELIZER MANUFACTURING
 - F. Initiated By: INSPECTIONS

PENDING (Enforcement actions issued prior to 4/1/2025 with no reporting action in the current reporting period):

1. DUST 2 DIAMONDS, LLC (SPRINGFIELD)
 - A. Violation: Performed an asbestos abatement project without possessing a license to perform asbestos abatement; openly accumulated friable asbestos-containing materials.
 - B. Initial Action Taken: NON #3908 issued 9/6/2024

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

2. INTERNATIONAL PAPER (SPRINGFIELD)

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

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