

### 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	0	2	2
Renewals	1	15	16
Modifications	2	4	6
Constructions	-	-	-
Terminated Permits	-	-	-

##### Stationary Sources Permits Issued, Year-to-Date

- Title V Operating Permits: 2
- Air Contaminant Discharge Permits: 17

Permits on public notice from July 1 to August 31, 2025		
Source Name	Reason for Public Notice	Type of Permit
E-Commerce Facility	Required by rule	Indirect Source Construction Permit (ISCP), off public notice on 7/22/25
Metropolitan Wastewater Management Commission – Eugene/Springfield Water Pollution Control Facility	Required by rule	Standard Air Contaminant Discharge Permit (Standard ACDP) on public notice August 18 – September 22, 2025

Permit Backlog as of August 31, 2025			
Permit Type	Permits by Type	Permits Extended Administratively	Percentage of Total (%)
Title V	15	0	0%
Standard	24	5	21%
Simple	25	1	4%
<b>Total</b>	<b>64</b>	<b>6</b>	<b>8%</b>

#### 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	291

### 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.

July 1, 2025 to August 31, 2025		Follow-Up Action	Pending	Closed	Total
Category of Violation	New				
Asbestos	-	-	1	3	4
Industrial	-	-	1	2	3
Outdoor Burning	1	-	-	3	4
Fugitive Dust	-	-	-	-	-
Home Wood Heating	-	-	-	-	-
<b>Totals</b>	<b>1</b>	<b>-</b>	<b>2</b>	<b>8</b>	<b>11</b>

**Attachment No. 3:** July & August 2025, Enforcement Actions Detail Report.

	2020	2021	2022	2023	2024	2025
<b>Notices of Non-compliance and Warnings</b>	15	21	24	19	9	16
<b>Notices of Violation with Civil Penalties</b>	26	17	24	15	5	12

**NEW/OPEN ENFORCEMENT ACTIONS DETAIL REPORT****7/1/2025 -- 8/31/2025****Report of open actions initiated since last report****NEW ENFORCEMENT ACTIONS:**

## 1. REMEDIOS ROMERO (COTTAGE GROVE)

- A. Violation: Respondent conducted the burning of prohibited materials, including painted wood, metal, tin cans, plastic bags, food waste, plastics fiberglass roofing and general household garbage in a burn barrel.
- B. Initial Action Taken: NON #3930 issued 08/06/2025
- C. Subsequent Action: NCP #2025-3930 (\$1,019) issued 08/06/2025:
- D. Resolution: PENDING
- E. Source Type: OUTDOOR BURNING
- F. Initiated By: COMPLAINT

**PENDING (Enforcement actions issued prior to 7/1/2025 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; payments are on schedule.
- 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 7/1/2025 and closed 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 05/30/2024
  - C. Subsequent Action: NCP #2024-3903 (\$6,800) issued 05/22/2025; 6/20/2025 request for reduction approved and reduced to \$4,200 – paid 8/4/2025
  - D. Resolution: CASE CLOSED on 8/4/2025
  - 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 approved with a Stipulated and Final Order (SFO) agreement to submit reports by the required due dates and reduced to \$1,600 – paid 8/18/2025
- D. Resolution: CASE CLOSED on 8/18/2025
- E. Source Type: FERTILIZER MANUFACTURING
- F. Initiated By: INSPECTIONS

3. KIM, STEPHEN ROMI (COTTAGE GROVE)

- A. Violation: Outdoor burning of prohibited materials (plastic and household garbage).
- B. Initial Action Taken: NON #3933 issued 06/25/2025
- C. Subsequent Action: None – Confirmation from the property owner that the tenants conducting the illegal outdoor burning have been evicted and moved from the property.
- D. Resolution: CASE CLOSED on 07/02/2025
- E. Source Type: OUTDOOR BURNING
- F. Initiated By: COMPLAINT

4. WILDE, DARREL LANE (JUNCTION CITY)

- A. Violation: Outdoor burning of prohibited materials (truck trailer, box springs and clothing).
- B. Initial Action Taken: NON #3934 issued 06/25/2025
- C. Subsequent Action: PENDING
- D. Resolution: PENDING
- E. Source Type: OUTDOOR BURNING
- F. Initiated By: COMPLAINT

5. ATEZ, INC. (EUGENE)

- A. Violation: Conducted and completed a friable asbestos abatement project at Cascade Manor without performing air clearance prior to leaving the site.
- B. Initial Action Taken: NON #3923 issued 05/02/2025

C. Subsequent Action: NCP #2025-3923 (\$4,865) issued 05/02/2025: request for hearing or reduction approved for \$2,800 – paid 7/15/2025.

D. Resolution: CASE CLOSED on 7/15/2025

E. Source Type: ASBESTOS

F. Initiated By: INSPECTION

6. VALLEY ENVIRONMENTAL DBA VAE LLC (LANE COUNTY)

A. Violation: Failure to notify LRAPA of date and startup at least 14 days prior to the relocation of a stationary source in accordance with condition 12.6 of Permit No. AQGP-013 General ACDP #208670.

B. Initial Action Taken: NON #3927 issued 05/02/2025

C. Subsequent Action: NCP #2025-3927 (\$3,200) issued 05/02/2025: request for reduction approved and reduced to \$2,200 – paid 7/14/2025

D. Resolution: CASE CLOSED on 7/14/2025

E. Source Type: PORTABLE ACI

F. Initiated By: LRAPA REPORT REVIEW

7. HARMON, SHARON (EUGENE)

A. Violation: Outdoor burning in a burn barrel.

B. Initial Action Taken: NON #3929 issued 05/22/2025

C. Subsequent Action: NCP #2025-3929 (\$550) issued 05/22/2025: request for reduction approved and reduced to (\$-0-) with signed SFO with agreement for the Respondent to permanently remove all burn barrels, with documents providing proof and cease violating LRAPA's outdoor burning rules and regulations; 7/14/2025 submitted proof with receipts of disposal of the burn barrel and sign SFO.

D. Resolution: CASE CLOSED on 7/14/2025

E. Source Type: OUTDOOR BURNING

F. Initiated By: COMPLAINT

8. EMPIRE PROPERTY MANAGEMENT (EUGENE)

- A. Violation: Respondent allowed open accumulation of friable asbestos containing materials (ACM) in a rental property.
- B. Initial Action Taken: NON #3932 issued 05/28/2025
- C. Subsequent Action: Respondent hired an asbestos abatement contractor to abate the friable ACM, the work was confirmed completed on 7/17/2025.
- D. Resolution: CASE CLOSED on 7/17/2025
- E. Source Type: ASBESTOS
- F. Initiated By: COMPLAINT