



Director's Report for July and August 2022

Meeting Date: September 8, 2022
Department: Director's Office
www.lrapa.org

Agenda Item No. 7
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AIR QUALITY: 07/01/2022 to 08/31/2022

JULY

Site	Date	Max AQI	Pollutant
Eug/Spfld	25-Jul-22	90	O3
Oak	30-Jul-22	55	PM
CottGrv	25-Jul-22	71	O3

AQI	Eug/Spfld	Oak	CottGrv	Range
Good	28	30	27	0-50
Moderate	3	1	4	51-100
USG	0	0	0	101-150
Unhealthy	0	0	0	151-200
Very Unhealthy	0	0	0	201-300
Hazardous	0	0	0	201-300

AUG

Site	Date	Max AQI	Pollutant
Eug/Spfld	17-Aug-22	74	O3
Oak	18-Aug-22	86	PM
CottGrv	17-Aug-22	58	O3

AQI	Eug/Spfld	Oak	CottGrv	Range
Good	28	25	30	0-50
Moderate	3	6	1	51-100
USG	0	0	0	101-150
Unhealthy	0	0	0	151-200
Very Unhealthy	0	0	0	201-300
Hazardous	0	0	0	201-300

Attachment No. 1: Air quality index charts for Eugene/Springfield (July-August 2022)

Attachment No. 2: Air quality index charts for Oakridge (July-August 2022)

Attachment No. 3: Air quality index charts for Cottage Grove (July-August 2022)

COMPLAINTS: 07/01/2022 to 07/31/2022 [TOTAL: 37]

1. **Smoke** – 11 total smoke complaints: 10 for outdoor burning and 1 for home wood heating.
2. **Industry** – 17 total complaints: 15 for International Paper, Springfield (odor); 1 for Nations Mini Mix, Springfield (odor); 1 for American Laminators, Swisshome (smoke)
3. **Miscellaneous/Unknown/other/asbestos** – 9 total complaints:

Unknown / Other

4 for unknown odors - Eugene
1 for Marijuana grow - South Eugene

Asbestos

1 in River Road
1 in Lowell
2 in Oakridge

COMPLAINTS: 08/01/2022 to 08/31/2022 [TOTAL: 49]

1. **Smoke** – 9 total smoke complaints: 8 outdoor burning and 1 for home wood heating
2. **Industry** – 15 total complaints: 14 for International Paper, Springfield (odor); 1 CPM Riverbend Materials (Coburg) water vapor concerns.
3. **Miscellaneous/Unknown/other/asbestos/Dust/Recreational fires** – 25 total complaints:

Unknown / Other

1 for odor - Illegal Marijuana grow - South Eugene
2 for odor - unknown - River Rd.
1 for Smoke from cooking stack Burger King - Main St Springfield
1 for chemical odor - South Eugene
1 for unknown odor - Central Eugene
1 for unknown odor - West Eugene
1 for Smoke Hideaway bakery - South Eugene
2 for roofing petroleum odor South Eugene
1 for chemical smells coming from neighbors apt. downtown Eugene
1 for Small emergency generator smoke, Central Eugene

Recreational Fires

1 in Swisshome
1 in Blachly
1 in Eugene Harlow
1 in Southwest Springfield

Complaints continued:

Dust

- 1 for Construction Delta Cottages - Eugene
- 1 for City of Eugene street sweeper - Willakenzie
- 1 for Dexter Sort Yard
- 1 for Ag operation - Hayden Bridge
- 1 for Mid-State sweeper - Saginaw

Asbestos

- 1 in Oakridge abandoned home
- 1 in Veneta demo
- 1 in Vida demo
- 1 in Florence demo

Year	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	*2022
Dust	44	30	14	25	32	25	26	15	17	26	7
Ag/Field Burning	1	17	4	12	9	1	0	6	2	7	2
General Air Quality	6	26	30	15	20	14	6	12	4	8	1
Home Wood Heating	95	219	121	342	130	197	126	128	74	57	38
Industry	128	122	127	52	58	74	50	170	100	336	149
Outdoor Burning	268	321	279	251	266	281	351	402	423	243	176
Slash Burning	7	5	7	11	26	13	24	16	12	10	1
Miscellaneous	79	52	57	85	164	138	66	67	59	40	67
Unknown	17	14	35	46	56	63	29	39	74	71	18
Total	645	806	674	839	761	806	678	855	765	798	459

* Year-To-Date

ENFORCEMENT: 07/01/2022 to 08/31/2022

Category of Violation	New	Follow-Up Action	Pending	Closed	Total
Asbestos	3	2	-	-	5
Industrial	2	2	1	-	5
Outdoor Burning	-	-	2	-	2
Fugitive Dust	-	-	-	-	-
Home Wood Heating	-	-	-	-	-
Totals	5	4	3	-	12

NEW/OPEN ENFORCEMENT ACTIONS STATUS REPORT

07/01/2022 -- 08/31/2022

Report of open and actions initiated since last report

NEW: 7/1/2022 -- 8/31/2022

1. **ALPINE ABATEMENT SERVICES, INC. (SPRINGFIELD) 638 NORTHRIDGE AVENUE**
 - A. Violation: Open storage or open accumulation of friable asbestos-containing material or asbestos containing waste material.
 - B. Initial Action Taken: NON #3858 issued 7/5/2022
 - C. Subsequent Action: NCP #2022-3858 (\$2,200) issued 7/5/2022; request for reduction approved and reduced to \$1,400 - paid.
 - D. Resolution: CASE CLOSED 08/19/2022

2. **WEYBRIGHT, BROGAN AND MICHELLE (COTTAGE GROVE) Tax Lot #20-03-28-14-00200**
 - A. Violation: Failure to obtain an asbestos survey from an accredited asbestos inspector prior to conducting the demolition of a facility; outdoor burning of prohibited materials (roofing shingles/tar paper, vinyl, drywall, metal, etc.); burning construction/demolition waste without first obtaining an LRAPA letter permit.
 - B. Initial Action Taken: NON #3859 issued 7/19/2022
 - C. Subsequent Action: NCP #2022-3859 (\$5,175) issued 7/22/2022; request for hearing received and denied due to the request was received after the 21 days, no payment or request for reduction received; default order judgment in process for a lien on the property
 - D. Resolution: PENDING

3. **SWANSON GROUP MFG LLC (SPRINGFIELD) 1651 SOUTH F STREET**
 - A. Violation: Exceeded 20% opacity as a six-minute block average from wood fired boiler; 16.a.iii. - failed to conduct visible emissions observations during operating conditions that include breakdown, upset, maintenance, and excursions of parametric monitoring requirements that may result in an

emission limit exceedance; 63.a. - failure to report an excess emission event within one hour of onset.

- B. Initial Action Taken: NON #3862 issued 7/19/2022
- C. Subsequent Action: NCP #22-3862 (3,900) issued 08/30/2022
- D. Resolution: PENDING

4. **THABET MANAGEMENT - BARGER ARCO 005 (EUGENE) 2155 CUBIT STREET**

- A. Violation: The permittee failed to submit in a timely manner performance testing records to LRAPA which demonstrate compliance with triennial vapor testing requirements outlined in permit conditions 5.1.a and 5.1.b. Prior test results relative to conditions 5.1.a and 5.1.b were submitted to LRAPA for testing conducted on May 10th, 2019. Permittee submitted test results relative to conditions 5.1.a and 5.1.b for testing conducted on July 11th, 2022, however, testing was required to have been conducted no later than May 10th, 2022.
- B. Initial Action Taken: NON #3864 issued 8/4/2022
- C. Subsequent Action: NCP #2022-3864 (\$2,250) issued 8/5/2022
- D. Resolution: PENDING

5. **JOOSSE, BRANDON (COTTAGE GROVE) 842 CHESTNUT AVENUE**

- A. Violation: Failure to provide for asbestos survey prior to commencing renovation or demolition of a facility
- B. Initial Action Taken: NON #3869 issued 8/8/2022
- C. Subsequent Action: PENDING
- D. Resolution: PENDING

ACTIONS PERFORMED (Enforcement actions issued prior to 07/01/2022 with subsequent action in the current reporting period):

1. **KINGSFORD MFG (SPRINGFIELD) 3315 MARCOLA ROAD**
 - A. Violation: Exceeded 20% opacity from EU03 (Permit condition 22.); failed to notify LRAPA of Excess Emission Event in accordance with Permit condition 86.a, failed to submit written report of the event in accordance with Permit condition 86.b.; 86.d.
 - B. Initial Action Taken: NON #3852 issued 3/15/2022
 - C. Subsequent Action: NCP #2022-3852 (\$6,600) issued 6/27/2022: paid
 - D. Resolution: CASE CLOSED on 7/5/2022

2. **OREGON INDUSTRIAL LUMBER PRODUCTS (SPRINGFIELD) 3950 MARCOLA ROAD**
 - A. Violation: Respondent continues to operate wood fired boiler in such a manner as to cause the deposition of ash fallout on the property of other persons and has failed to correct the issue in a timely manner.
 - B. Initial Action Taken: NON #3838 issued 6/21/2021; the week of 7/4/2022 through 7/12/2022 planned install of multiclone and ID fan; 6/27/2022 update with planning to shut down for the equipment install on July 1st. Estimated startup with the multi-clone in place on July 12th. On 07/15/2022 LRAPA affirmed the equipment was installed and operational.
 - C. Subsequent Action: NCP #2021-3838 (\$3,200) issued 8/15/2022
 - D. Resolution: PENDING

3. **MINISTRY CONSTRUCTION LLC (EUGENE) 837 EAST 39TH PLACE**
 - A. Violation: Failure to obtain an asbestos survey from an accredited asbestos inspector prior to conducting the renovation of a facility; 43-015(8)(B) - Allowing for the open storage and accumulation of asbestos containing materials or asbestos containing waste materials.
 - B. Initial Action Taken: NON #3857 issued 5/26/2022

- C. Subsequent Action: NCP #2022-3857 (\$6,600) issued 6/1/2022: no response, default order judgment filed with Lane County for a lien on the property
 - D. Resolution: CASE CLOSED on 8/29/2022
4. **BASARABA, DANIEL ABIGAIL BASARABA, DB REAL ESTATE INVESTMENTS LLC, PLANKTOWN HOLDINGS LLC (CRESWELL) 82671/82645 HOWE LANE**
- A. Violation: failure to attend outdoor burning until extinguished; failure to promptly extinguish illegal outdoor burning; outdoor burning when prohibited; outdoor burning such as to create a nuisance or hazard to public safety; outdoor burning of prohibited materials (wiring, aerosol cans, materials that emit noxious odors when outdoor burned); failure to conduct outdoor burning in an efficient manner; outdoor burning of construction/demolition wastes without first obtaining a letter permit issued by LRAPA.
LRAPA Title 47 "Outdoor Burning" enclosed; Respondent may submit to LRAPA in writing, within 15 days of receipt of NON 3845, an account of the events pertaining to the allegations expressed in the "Violations(s) description:" section of NON 3845.
 - B. Initial Action Taken: NON #3845 issued 11/29/2021
 - C. Subsequent Action: NCP #2021-3845 (\$6,813) issued 6/15/2022: request for hearing received 7/7/2022, scheduling of hearing on hold for pending settlement negotiation
 - D. Resolution: PENDING
5. **JOHNSON, CHRIS & JULIE RENFRO (COTTAGE GROVE) 30579 KENADY LANE**
- A. Violation: Outdoor burning such as to create a nuisance; outdoor burning of prohibited materials (household garbage); conducting outdoor burning in barrels
 - B. Initial Action Taken: NON #3855 issued 4/6/2022
 - C. Subsequent Action: NCP #2022-3855 (\$375) issued 6/27/2022: NCP returned, re-issued 6/27/2022 and served on 8/8/2022 by Titanium Legal Server; no response, default order judgment in process for a lien on the property
 - D. Resolution: PENDING

6. **FORREST PAINT COMPANY (EUGENE) 1011 MCKINLEY STREET**

- A. Violation: Failure to operate and maintain the air contaminant collection unit, biofilter, in a manner which minimizes air contaminant discharges, and failure to update the biofilter Operation and Maintenance (O&M) Plan once knowledge was acquired of insufficient maintenance and parametric data monitoring was discovered to ensure the biofilter is operated at the highest reasonable efficiency and effectiveness.
- B. Initial Action Taken: NON #3860 issued 6/22/2022
- C. Subsequent Action: On schedule with submitting biweekly status reports
- D. Resolution: PENDING

7. **BASARABA, DANIEL ABIGAIL BASARABA, DB REAL ESTATE INVESTMENTS LLC, PLANKTOWN HOLDINGS LLC (CRESWELL) 82671/82645 HOWE LANE**

- A. Violation: Failure to obtain an asbestos survey from an accredited asbestos inspector prior to conducting the demolition of a facility at: 82671/82645 Howe Lane, Creswell, OR, 97426. Respondent may submit to LRAPA in writing, within 15 days of receipt of NON 3861, an account of the events pertaining to the allegations expressed in the "Violations(s) description:" section of NON 3861.
- B. Initial Action Taken: NON #3861 issued 6/24/2022
- C. Subsequent Action: NCP #2022-3861 (\$5,000) issued 8/08/2022
- D. Resolution: PENDING

For a perspective of the total number of enforcement actions for calendar year 2022 compared to previous years

Year	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	*2022
Notices of Non-compliance and Warnings	41	51	36	38	41	39	41	55	15	21	17
Notices of Violation with Civil Penalties	29	23	28	37	37	28	43	37	26	17	17

OUTDOOR BURNING LETTER PERMITS: 07/01/2022 to 08/31/2022

There was one Outdoor Burning Letter Permit (OBLP) issued in July and August.

1. Issued Special Letter Permit 20B22-08-01 on August 25 to Rivers to Ridges, Jason Blazar, Eugene, to burn 50 cubic yards of miscellaneous yard debris located at various in Lane County.

ASBESTOS ABATEMENT: 07/01/2022 to 08/31/2022

During July, LRAPA received 41 notices of asbestos removal projects, three of which were Schools (Creswell Elementary, North Eugene High School and Lane ESD).

During August, LRAPA received 48 notices of asbestos removal projects, three of which were Schools (Mohawk High School, Oakridge School District, Creslane Elementary School).

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 2022 compares to previous years:

Year	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	*2022
Total Asbestos Abatement Notices	324	351	352	426	444	543	428	488	439	408	325
School Asbestos Abatement Notices (NESHAP)	53	24	21	24	27	28	24	16	25	20	14
Number of Asbestos Abatements Inspected	90	96	67	89	82	120	77	94	93	104	85

* Year-To-Date.

PERMITTING (TITLE V AND ACDP): 07/01/2022 to 08/31/2022

LRAPA currently permits 14 Title V sources and approximately 275 Air Contaminant Discharge Permit (ACDP) sources. Below are the total numbers of permit activities that are new, renewals, modifications, construction approvals, registration applications, terminated and/or total issued permits the Operations staff currently have in process.

Category of Permit Activity	Title V	ACDP	Registration	Total Active
New	-	8	-	8
Renewals	5	18	-	23
Modifications	1	1	-	2
Constructions	-	-	-	-
Registrations	-	-	-	-
Terminated Permits	-	4	-	4
Total Issued Permits Year-to-date	10	40	-	50

July and August 2022 Public Affairs Monthly Summary

Smoke management from wood stoves, outdoor burning, and wildfires

Wildfire season has arrived in Oregon. Multiple fires began burning in the Oregon cascades and northern California in late July. Smoke from these fires has periodically impacted air quality in Lane County. Beginning in the first week of August LRAPA began participating on near-daily cooperators meetings for the Windigo, Potter, Big Swamp fires. The second week of August LRAPA joined cooperator meetings for the Cedar Creek Fire. Cooperator meetings are designed to share information on fire activity and suppression, describe the expected fire intensity and smoke production for the day, and review the air quality outlook for surrounding Smoke Sensitive Receptor Areas (SSRAs).

LRAPA communicates air quality messaging related to smoke intrusions through Facebook, Twitter, press releases, and a text message service provided for the Oakridge-Westfir community.

On July 14, LRAPA participated in the second annual "Fire Safety Night" in Oakridge to promote Firewise effort and educate community members on air quality issues related to both wildfires and wood stoves. This event was scheduled for June 3 but was postponed to July due to heavy rain.

Attainment designation

The Oakridge-Westfir redesignation from nonattainment to attainment for National Ambient Air Quality Standards has been approved by the EPA and signed by EPA's Region 10 administrator. The change was published in the Federal Register on August 22, 2022 and has an effective date of September 21, 2022. LRAPA is engaged with the EPA and local stakeholders to publish a press release highlighting this accomplishment.

Public outreach efforts

LRAPA was invited to host a booth at "Bethel Summer Fun" events happening throughout June and July. LRAPA participated on July 2 and hosted a booth at Grasshopper Meadows Park in west Eugene from 10:00am to 2:00pm.

LRAPA presented on the Public Participation and Commenting Process for LRAPA Actions to the Santa Clara Community Organization on July 7, 2022. Staff took questions and engaged in air quality discussions with the group following the presentation.

LRAPA provided a presentation on air quality data from Purple Air sensors installed throughout west Eugene at the Citizen Advisory Committee's July meeting. This presentation also compared the data to other locations throughout Eugene. LRAPA staff answered questions and engaged in discussion with meeting participants.

LRAPA's website redesign is nearly complete! LRAPA and the website developer have settled on a launch date of Thursday, September 15.

Public Meetings, Hearings, and Events

LRAPA held two public hearings in July and August related to Seneca Sustainable Energy, LLC and the Seneca Sawmill Company's permit renewal and modifications. The facilities are considered separate sources for the regulation of Criteria Pollutants but a singular source for the regulation of Hazardous Air Pollutants. Seneca Sawmill Company's proposed permit increased emissions that qualify the facility as a "major source" of Hazardous Air Pollutants.

The timeline of important dates as well as a copy of comments submitted, and agency responses can be found publicly on [LRAPA's Cleaner Air Oregon & Permitting Community Engagement webpage](#).

Seneca Sustainable Energy, LLC.

- Public comment period: June 3, 2022 to July 27, 2022 – 55 days
- Public informational meeting and public hearing: July 11, 2022 [View recording](#)
 - Participation possible online or in-person at the Eugene Library.
 - Online participation: 22
 - In-person participation: 4
- Number of commenters: 84
- Number of summarized comments and responses: 17
- EPA Review: in-progress. Period ends 9/19/22
- Permit issuance: anticipated late September.

Seneca Sawmill Company

- Public comment period: July 13, 2022 to August 22, 2022 – 40 days
- Public informational meeting and public hearing: August 10, 2022 [View recording](#)
 - Participation possible online only.
 - Online participation: 21
- Number of commenters: 16
- Number of summarized comments and responses:
- EPA Review: n/a
- Permit issuance: anticipated late September.

Public affairs were present or participated in three community meetings:

- Hosted a booth at Bethel Summer Fun – Saturday July 2, 2022 | 10:00am – 2:00pm
 - Met residents and discussed air quality topics and answered questions.
- Santa Clara Community Organization – Thursday July, 2022 | 7:00pm – 9:00pm
 - Presented on the public participation and commenting process on LRAPA actions.
- Fire Safety Night – Thursday July 14, 2022 | 5:00pm – 7:00pm
 - LRAPA engaged Oakridge and Westfir residents on air quality topics and home wood heating upgrades.

Media Contacts	DATE	MEDIA	REPORTER	TOPIC
	07/25/2022	RG	Adam Duvernay	Ozone & Smoke impact on AQ
	07/26/2022	KVAL	Kierstin Lindkvist	Ozone & Smoke impact on AQ
	07/27/2022	KLCC	Chris Lehman	Air Toxic monitoring in Oakridge
	07/27/2022	RG	Adam Duvernay	Air Toxic monitoring in Oakridge
	08/18/2022	KVAL	Keely McCormick	Oakridge Air quality
	08/31/2022	KVAL	Kierstin Lindkvist	Smoke impact on air quality

Press Releases	DATE	TOPIC
	07/07/2022	LRAPA begins air toxics monitoring in Oakridge
	07/26/2022	Air quality advisory for the southern Willamette Valley due to smog

Home Wood Heating Complaints
 1 for July 2022
 1 for August 2022
 (as of 8:15am 9/1/2022)

UPCOMING LRAPA BOARD AGENDA ITEMS

This schedule outline is a preview of upcoming agenda items, and we will update it as the time frames for additional issues become firmer.

July 2022:

- ~~Audit Report follow-up~~
- ~~Status report on Oakridge Air Project.~~
- ~~Director's Performance Review & Results (Possible continued Executive Session)~~
- ~~Old Business follow-up~~

August 2022 – NO MEETING

September 2022:

- Board Work Sessions – Proposed Dates.
- LRAPA Partners Meeting-August 19, 2022.

October 2022:

- Dashboard Report update.
- Status report on Oakridge Air Project.

November 2022:

- Approve local dues request to IGA partners for FY2024.
- Airmetrics business plan.

December 2022 – NO MEETING

January 2023:

- Preview upcoming appointments on board and committees.
- Status report on Oakridge Air Project.

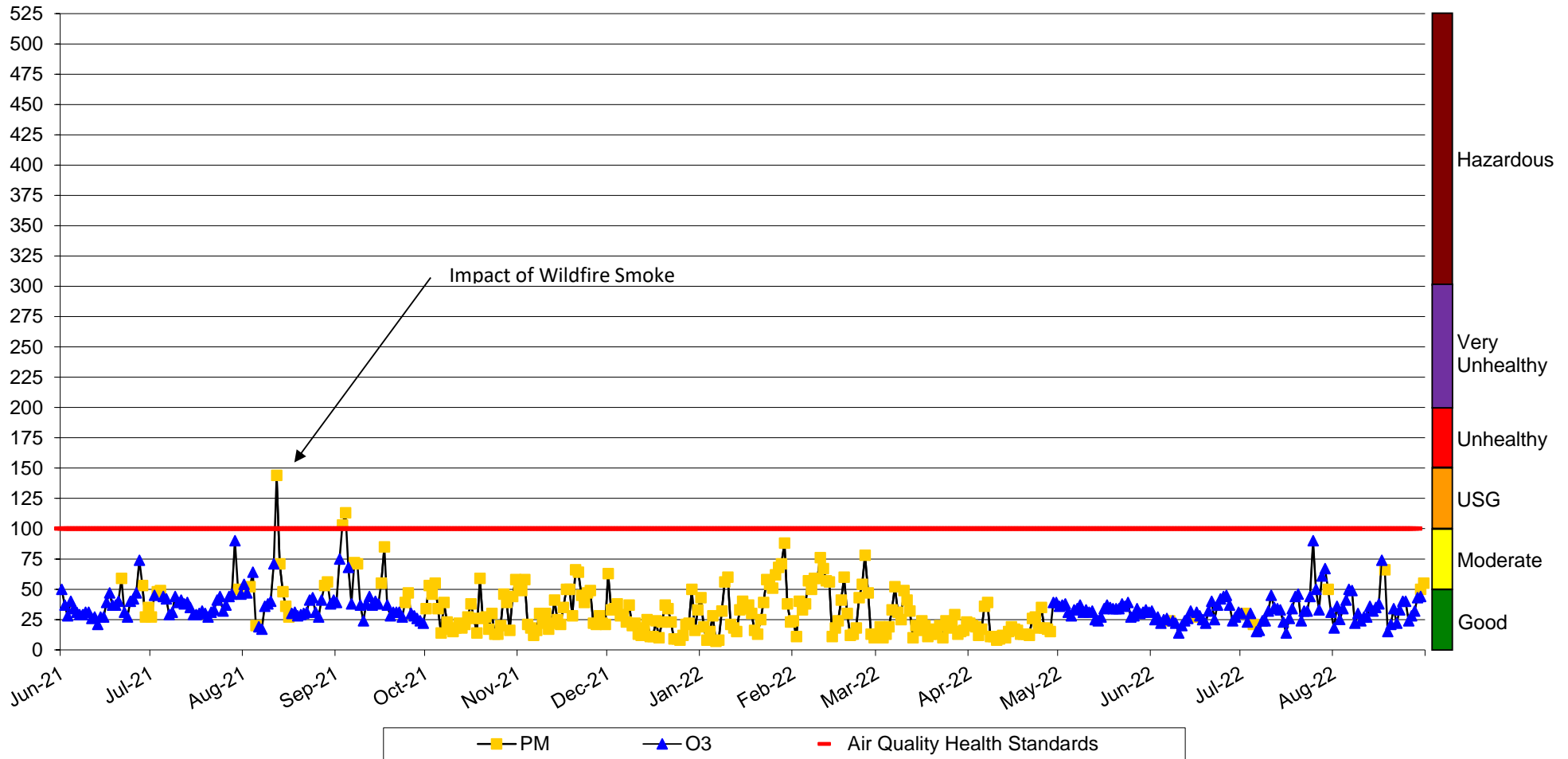
February 23:

- Nominations/Appoint Board Chair and Vice Chair.
- Nominations/Appoint new Budget Committee Members and Budget Officer.
- Review multi-year budget forecast for FY2023-2027 NOTE: Last year's conversation included incorporating a new methodology if grant funding may not be available in the future and the use of Airmetrics Enterprise Funding.

SAD/dsw

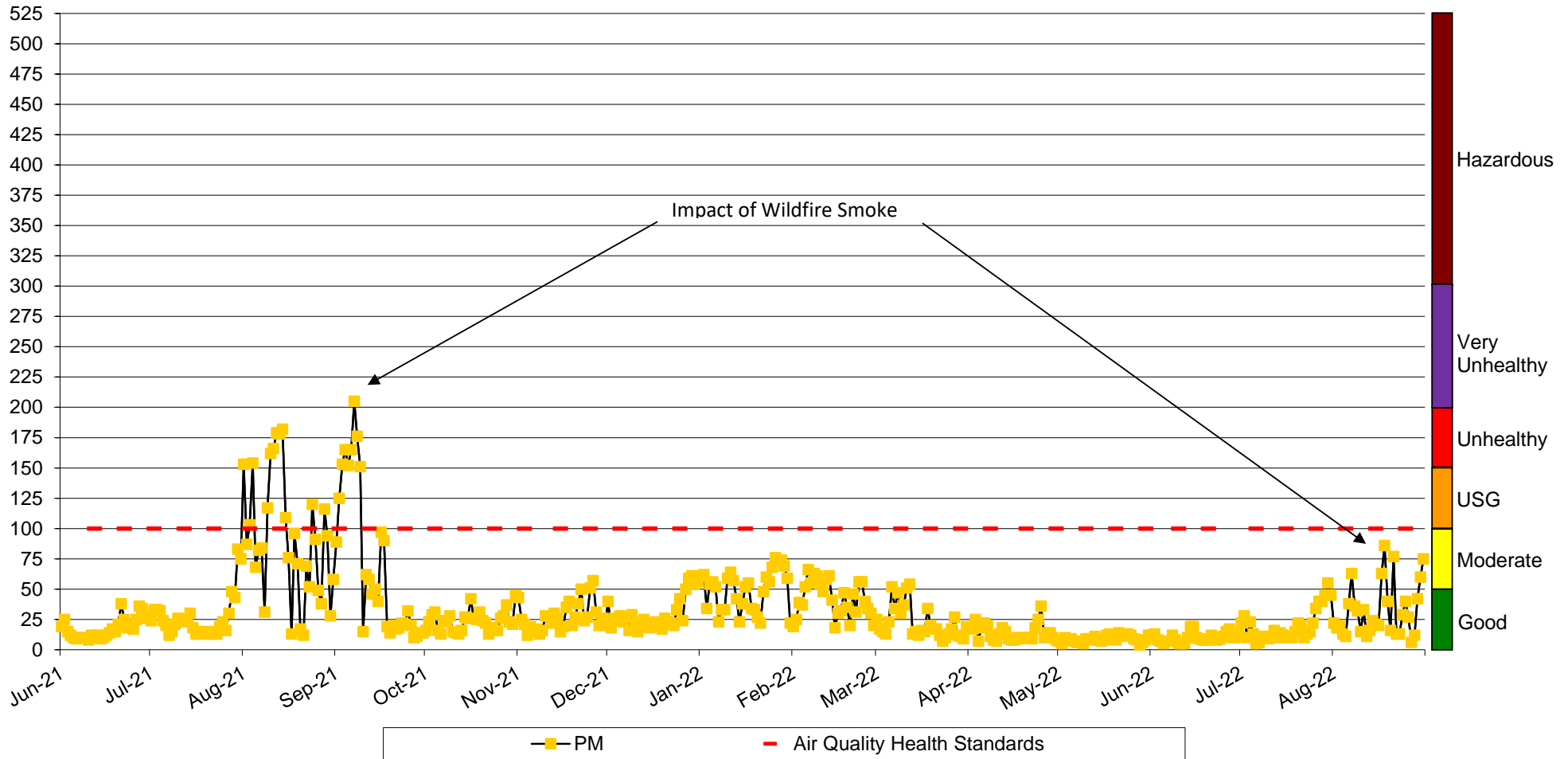
Air Quality Index Chart - Eugene/Springfield

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



Air Quality Index Chart - Oakridge

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



Air Quality Index Chart - Cottage Grove

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

