



**LRAPA BOARD OF DIRECTORS
AGENDA ITEM SUMMARY**

Director's Report for October 2021

Meeting Date: November 17, 2021
Department: Director's Office
www.lrapa.org

Agenda Item No. 8
Staff Contact: Steven A. Dietrich
Contact Telephone: 541-736-1056 x 216

AIR QUALITY: 10/01/2021 to 10/31/2021

October

Site	Date	Max AQI	Pollutant
Eug/Spfld	19-Oct-21	59	PM
Oak	31-Oct-21	45	PM
CottGrv	30-Oct-21	55	PM

AQI	Eug/Spfld	Oak	CottGrv	Range
Good	27	31	29	0-50
Moderate	4	0	2	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 (October 2021)

Attachment No. 2: Air quality index charts for Oakridge (October 2021)

Attachment No. 3: Air quality index charts for Cottage Grove (October 2021)

COMPLAINTS: 10/01/2021 to 10/31/2021 [TOTAL: 42]

- Smoke** – 29 total smoke complaints: 24 for outdoor burning; 2 for home wood heating; 1 for agricultural burning and 2 for unknown smoked.
- Industry** – 22 total complaints: 8 for International Paper; 12 for JH Baxter; 1 for 9Wood and 1 for Hexion.

3. **Miscellaneous/Unknown/Dust** – 8 total miscellaneous complaints: 7 for unknown odor and 1 for marijuana odor.

For perspective, here is how the total number of complaints received for calendar year 2021 compares to previous years:

Year	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	*2021
Fugitive Dust	33	44	30	14	25	32	25	26	15	17	26
Ag/Field Burning	13	1	17	4	12	9	1	0	6	2	7
General Air Quality	6	6	26	30	15	20	14	6	12	4	8
Home Wood Heating	135	95	219	121	342	130	197	126	128	74	39
Industry	169	128	122	127	52	58	74	50	170	100	280
Outdoor Burning	341	268	321	279	251	266	281	351	402	423	202
Slash Burning	16	7	5	7	11	26	13	24	16	12	10
Miscellaneous	101	79	52	57	85	164	138	66	67	59	38
Unknown	25	17	14	35	46	56	63	29	39	74	54
Total	839	645	645	806	839	761	806	678	855	765	664

* Year-to-date.

ENFORCEMENT: 10/01/2021 to 10/31/2021

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

Attachment No. 4: Enforcement activities during these reporting periods for case details. For a perspective of the total number of enforcement actions for calendar year 2021 compared to previous years, this table is located on the last page of Attachment No. 4 on the last page.

OUTDOOR BURNING LETTER PERMITS: 10/01/2021 to 10/31/2021

There were two Outdoor Burning Letter Permit (OBLP) issued in October.

1. Issued Special Letter Permit 20B21-10-02 on October 29 to Rainbow Mobile Home Park, 54655 McKenzie River Drive, Blue River, to burn 30 cubic yards of Commercial debris located at the same address.
2. Issued Special Letter Permit 20B21-10-03 on October 29 to Ross Good, 42566 Deerhorn Road, Springfield, to burn 30 cubic yards of Land Clearing debris located at the same address.

ASBESTOS ABATEMENT: 10/01/2021 to 10/31/2021

During October, LRAPA received 34 notices of asbestos removal projects, none of which were Schools.

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 2021 compares to previous years:

Year	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	*2021
Total Asbestos Abatement Notices	357	324	351	352	426	444	543	428	488	439	357
School Asbestos Abatement Notices (NESHAP)	61	53	24	21	24	27	28	24	16	25	19
Number of Asbestos Abatements Inspected	106	90	96	67	89	82	120	77	94	93	94

* Year-to-date.

PERMITTING (TITLE V AND ACDP): 01/01/2021 to 08/31/2021

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	-	3	-	3
Renewals	8	25	-	33
Modifications	2	2	-	4
Constructions	-	-	-	-
Registrations	-	-	-	-
Terminated Permits	-	-	-	-
Total Issued Permits Year-to-date	9	39	-	48

PUBLIC INFORMATION – Travis Knudsen

On-Going

Fall Outdoor Burning Seasons

Fall outdoor burning season usually runs through the month of October in applicable portions of Lane County. This year's Fall season was initially delayed by the Oregon Department of Forestry and the Lane Fire Defense Board until October 15th due to continued hot and dry conditions. A series of storms in early October prompted the opening of Fall outdoor burning on October 12th.

In response to a City of Springfield initiative to create a flowchart depicting all burning rules within the City of Springfield and Springfield UGB, LRAPA public Affairs committed time to crafting a similar flowchart for all locations within Lane County. This flowchart has taken the form of an [interactive PREZI presentation](#). The PREZI presentation has been posted to our [Outdoor Burning Page](#). This PREZI presentation is functional in its current form but will see improvements over time to make the information clearer and more readable.

Public outreach efforts

In October, LRAPA held a public hearing, at the request of interested parties, for Northwest Pipeline LLC. The hearing was held for proposed draft Air Contaminant Discharge Permit No. 205811 (ACDP 205811) and Review Report for the renewal for the Northwest Pipeline LLC's natural gas compressor station located at 85166 North Hideaway Hills Road in Eugene.

LRAPA, in coordination with partners, jointly hosted semi-annual meeting on Oakridge Air to share updates and progress with stakeholders. Oakridge Air will begin to move a second cohort of homes through the program this Fall. Delays are occurring due to supply chain disruption and rising costs.

LRAPA public affairs presented at a First-Year Interest Group (FIGs) college course at the University of Oregon. This presentation provided an overview of LRAPA and potential career paths in the air regulatory sector and educational degrees helpful for such careers.

Other notable details

Work continues for LRAPA's redesignation request and maintenance plans for PM2.5 and PM10 pollution in the Oakridge/Westfir airshed. Time was committed throughout October to prepare for an Environmental Quality Commission meeting in November. LRAPA anticipates adoption of the maintenance plans into the State Implementation Plan before being forwarded to the EPA for adoption and publication in the federal register. LRAPA remains on schedule for the Oakridge/Westfir airshed to be redesignated to 'attainment' in Spring 2022.

Public Meetings

In October, public affairs participated in one community meetings:

- NW Pipeline LLC, Public Hearing – Tuesday October 12th, 2021
 - Shared information on the ACDP No. 205811
 - Answered questions about the facility, and accepted public comments delivered at the hearing.

Media Contacts	DATE	MEDIA	PERSON	TOPIC
	10/12/2021	Eugene Weekly	Cole Sinanian	DEQ Green House Gas rulemaking
Press Releases	n/a	n/a		

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.

October 2021:

- ~~Dashboard update and priorities review.~~
- ~~Status report on Oakridge Air Program.~~
- ~~November meeting date change from 11/11/2021 to 11/17/2021.~~
- ~~2021 Wildfire Cleanup Rule~~
- ~~Six Month Review of Accomplishments & Goals~~

November 2021:

- Approve local dues request to IGA partners for FY2023.
- Benefits Evaluation – Resolution Proposal.

December 2021: No meeting.

January 2022:

- Preview upcoming appointments on board and committees.
- Status report on Oakridge Air Program.
- Review multi-year budget forecast for FY2022-2026.
- Auditor report for FY2021

February 2022:

- Elect board chair and vice-chair.
- Appoint new budget committee members and budget officer.
- Status report on Oakridge Air Project
- Review multi-year budget forecast for FY2022-2026

March 2022:

- First budget meeting on proposed budget for FY2023 (July 2022 – June 2023).

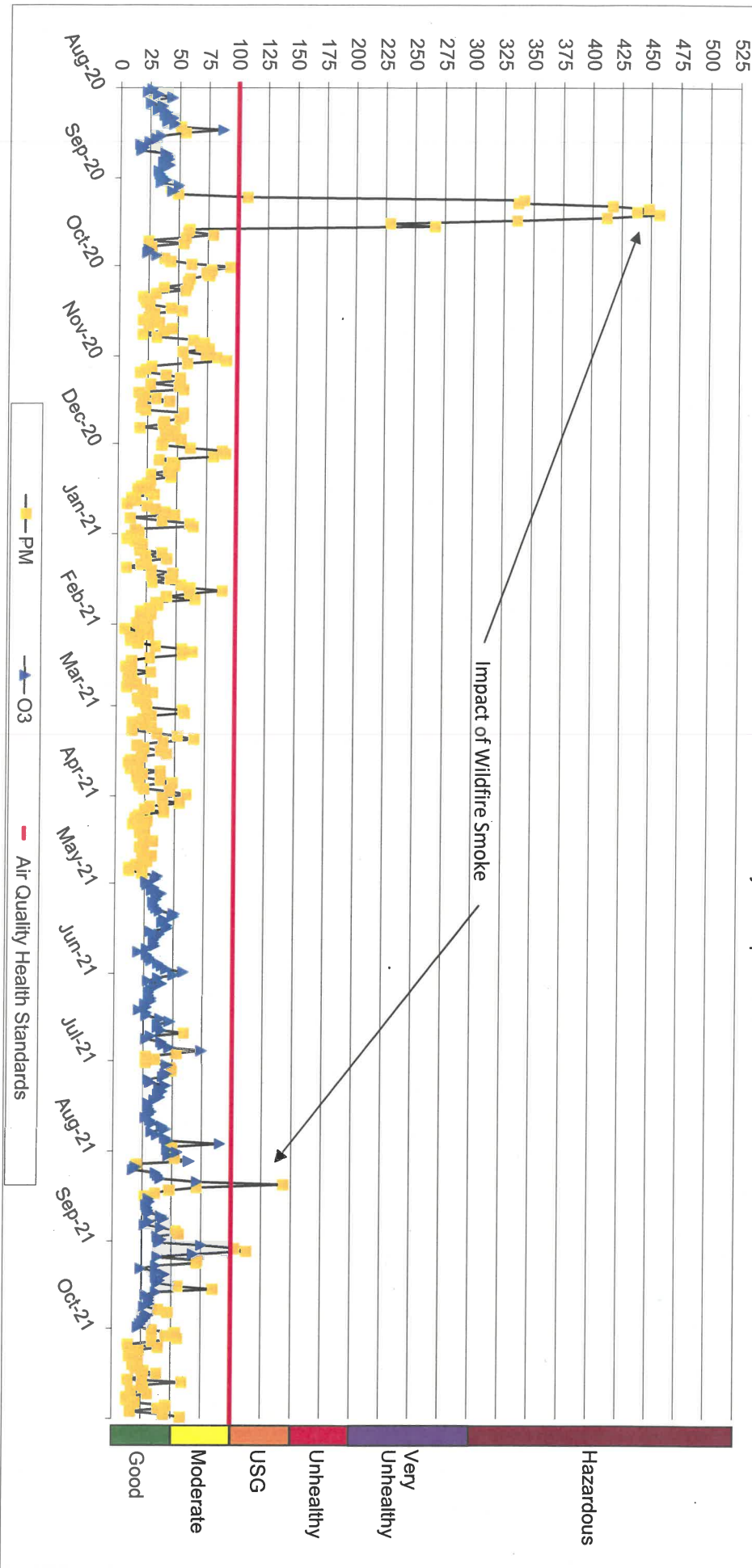
April 2022:

- Second budget meeting on proposed budget for FY2022.
- Status report on Oakridge Air Project.
- Dashboard update.

SAD/cmw

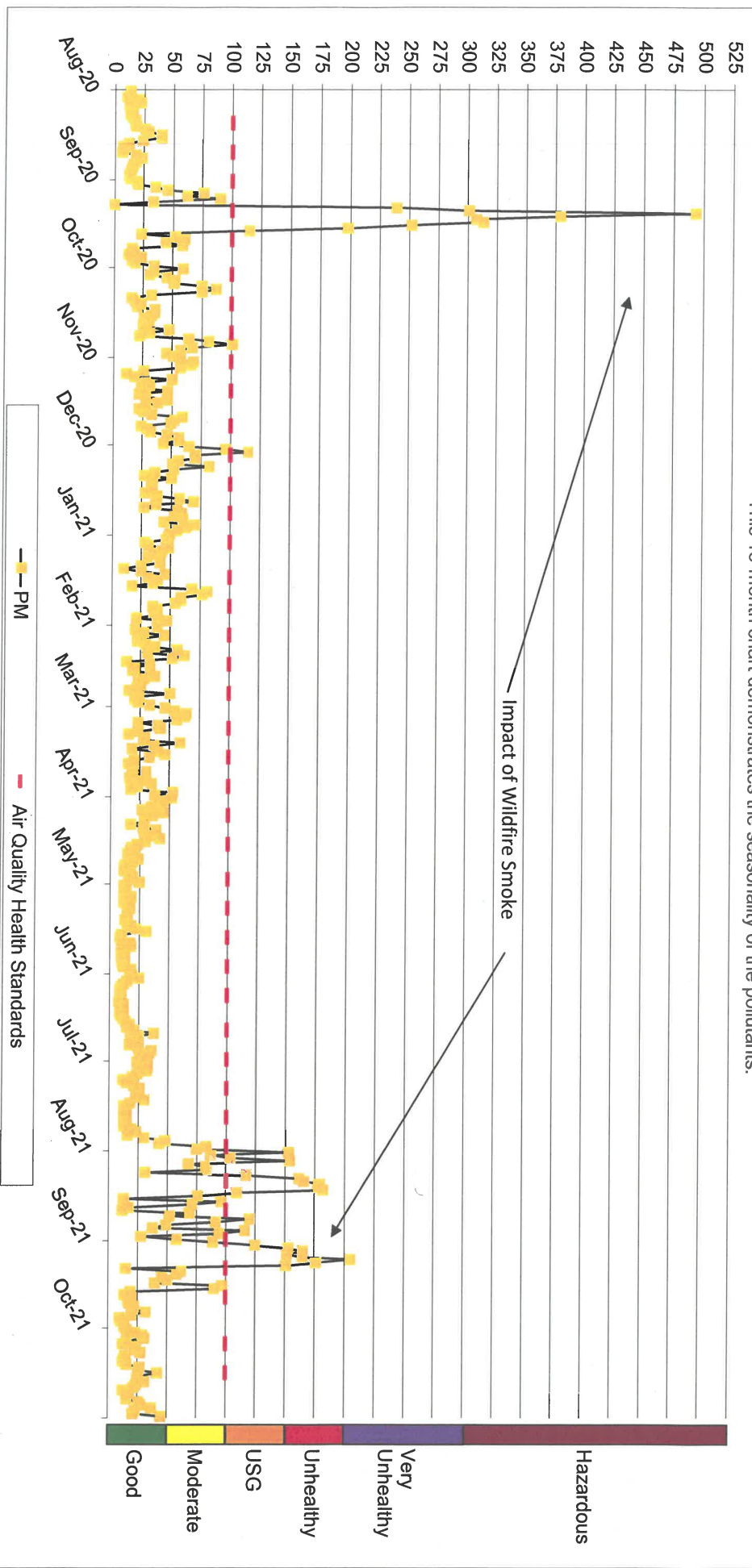
Air Quality Index Chart - Eugene/Springfield

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



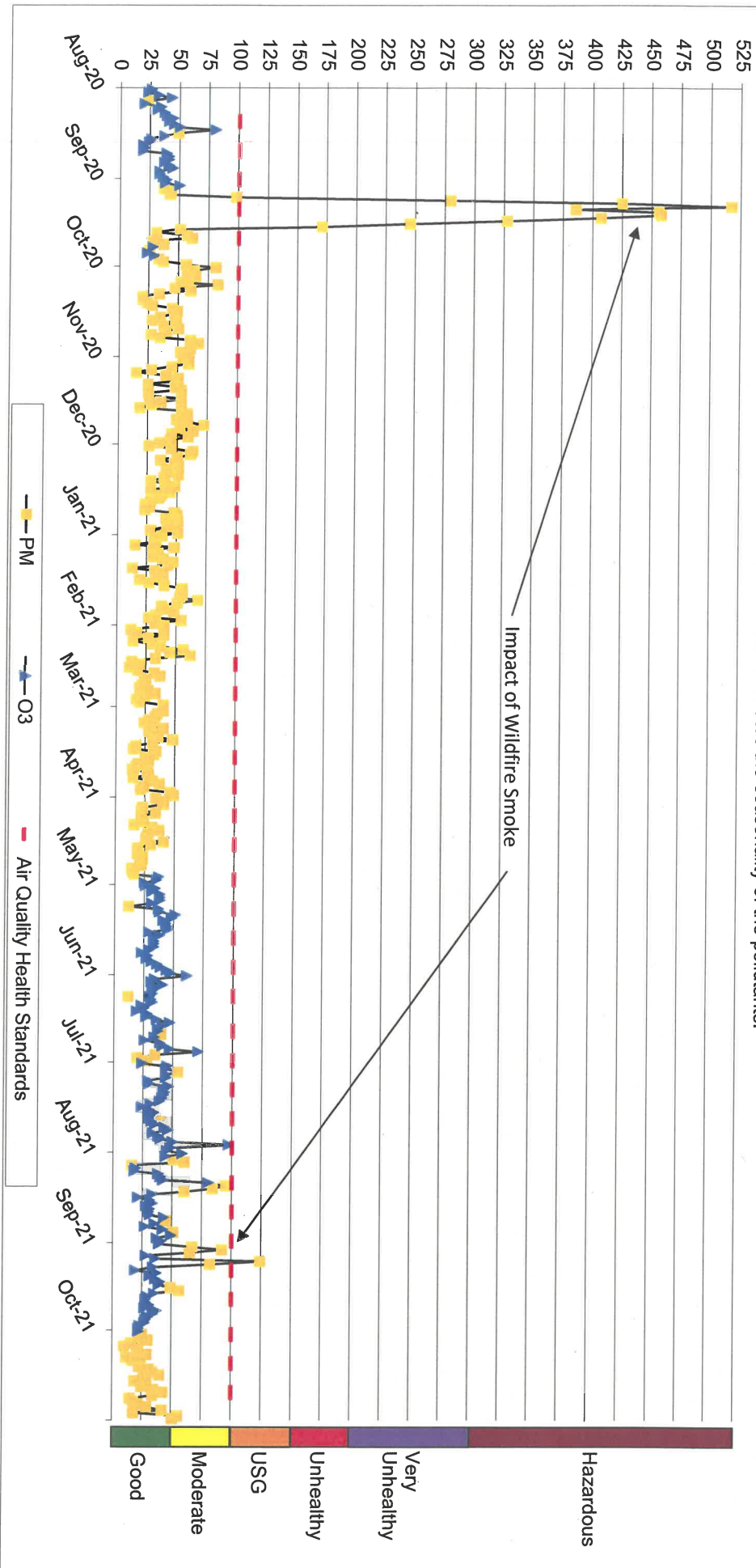
Air Quality Index Chart - Oakridge

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.



NEW/OPEN ENFORCEMENT ACTIONS STATUS REPORT

10/01/2021 -- 10/31/2021

Report of open and actions initiated since last report

NEW Enforcement Actions: 10/01/2021 -- 10/31/2021

1. ESSEX CONSTRUCTION (EUGENE)
 - A. Violation: 43-015(7) Failure to obtain an asbestos survey from an accredited asbestos inspector prior to conducting the demolition of a facility and 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 #3841 issued 10/19/2021
 - C. Subsequent Action: NCP #2021-3841 (\$2,200) issued 10/19/2021
 - D. Resolution: PENDING

2. WOODBURY ENERGY COMPANY EUGENE (EUGENE)
 - 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. Permittee last submitted testing results relative to condition 5.1.b on August 8, 2018, and therefore is required to conduct equivalent testing by August 8th, 2021. Condition 7.1.c of the permit requires notification of upcoming testing be submitted to LRAPA and condition 7.2 requires test results be submitted to LRAPA no later than 30 days after testing has occurred.
 - B. Initial Action Taken: NON #3842 issued 10/11/2021
 - C. Subsequent Action: Submitted Test Report for testing conducted on 10/17/2021 and signed NON.
 - D. Resolution: PENDING

ACTIONS PERFORMED (Enforcement actions issued prior to 10/01/2021 with subsequent action in the current action in reporting period):

1. LANE COUNTY SHORT MOUNTAIN LANDFILL (EUGENE)
 - A. Violation: Failure to cover active asbestos containing waste materials (ACWM) disposal area at the end of each day that new ACWM is disposed of with tarp that is identical to, or equivalent of, materials used to cover active areas of the general landfill.
 - B. Initial Action Taken: NON #3830 issued 06/17/2021
 - C. Subsequent Action: NCP #2021-3820 (\$3,900) issued 10/01/2021: request for reduction approved with a Stipulated Final Order (SFO) and pay \$1,950 along with the required conditions agreed to in the SFO 21-3830 to immediately implement verification that the ACWM disposal area has been adequately covered at the end of each business day; maintain a record of these inspections along with the dates and signature of employee for review upon LRAPA request; annually provide review of the Title V Operating Permit conditions specific to asbestos requirements to each employee with signatures and dates of the reviews on a form and submit these records along with the Title V Annual Report by March 1st of each year; 10/19/2021 submitted signed SFO, waiting for reduced civile penalty amount due by 11/18/2021
 - D. Resolution: PENDING
2. KUYKENDALL, ROBERT & DAVE COOPERS (FALL CREEK)
 - A. Violation: Outdoor burning when prohibited; outdoor burning such as to create a nuisance or hazard to public safety; outdoor burning of prohibited materials (plastics, metal cans, glass, etc.).
 - B. Initial Action Taken: NON #3840 issued 09/29/2021
 - C. Subsequent Action: NCP #2021-3840 (\$600) issued 10/01/2021; no response, default order judgment in process for a lien on the property
 - D. Resolution: PENDING

PENDING (Enforcement actions issued prior to 10/01/2021 with no subsequent action in the current reporting period):

1. OREGON INDUSTRIAL LUMBER PRODUCTS, (SPRINGFIELD)
 - 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 06/21/2021
 - C. Subsequent Action: PENDING
 - D. Resolution: PENDING

For perspective, here is the total number of enforcement actions for calendar year 2021 compared to previous years:

Year	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	*2021
Notices of Non-compliance and Warnings	64	41	51	36	38	41	39	41	55	15	16
Notices of Violation with Civil Penalties	42	29	23	28	37	37	28	43	37	26	14

* Year-to-date.