



**LRAPA BOARD OF DIRECTORS
AGENDA ITEM SUMMARY**

Director's Report for July and August 2021

Meeting Date: September 9, 2021
Department: Director's Office
www.lrapa.org

Agenda Item No. 7
Staff Contact: Steven A. Dietrich
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AIR QUALITY: 07/01/2021 to 08/31/2021

July

Site	Date	Max AQI	Pollutant
Eug/Spfld	27-Jul-21	90	O3
Oak	30-Jul-21	83	PM
CottGrv	27-Jul-21	97	O3

AQI	Eug/Spfld	Oak	CottGrv	Range
Good	30	30	29	0-50
Moderate	1	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

August

Site	Date	Max AQI	Pollutant
Eug/Spfld	12-Aug-21	144	PM
Oak	14-Aug-21	182	PM
CottGrv	12-Aug-21	95	PM

AQI	Eug/Spfld	Oak	CottGrv	Range
Good	23	7	23	0-50
Moderate	7	12	8	51-100
USG	1	5	0	101-150
Unhealthy	0	7	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 and August 2021)

Attachment No. 2: Air quality index charts for Oakridge (July and August 2021)

Attachment No. 3: Air quality index charts for Cottage Grove (July and August 2021)

COMPLAINTS: 07/01/2021 to 08/31/2021 [TOTAL: 132]

1. **Smoke – 21** total smoke complaints: 17 for outdoor burning; 3 for home wood heating and 1 for Wood Recovery fire in Junction City.
2. **Industry – 74** total complaints: 63 for International Paper; 4 for JH Baxter; 2 for Emerald Forest Products; 2 for Delta Sand & Gravel; 1 for Aurora Innovations and 1 for Mohawk Meat.
3. **Miscellaneous/Unknown/Dust – 37** total miscellaneous complaints: 12 for fugitive dust; 3 for general air quality; 1 for asbestos; 12 for unknown odors; 1 for a Wildish Construction; 1 for wildfire smoke; 1 for Creswell Water Treatment Facility; 1 for Cottage Grove Speedway; 1 for diesel exhaust; 1 for general exhaust; 1 for meat smoker business and 2 for Umpqua Roofing.

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	22
Ag/Field Burning	13	1	17	4	12	9	1	0	6	2	5
General Air Quality	6	6	26	30	15	20	14	6	12	4	7
Home Wood Heating	135	95	219	121	342	130	197	126	128	74	35
Industry	169	128	122	127	52	58	74	50	170	100	242
Outdoor Burning	341	268	321	279	251	266	281	351	402	423	171
Slash Burning	16	7	5	7	11	26	13	24	16	12	10
Miscellaneous	101	79	52	57	85	164	138	66	67	59	33
Unknown	25	17	14	35	46	56	63	29	39	74	38
Total	839	645	645	806	839	761	806	678	855	765	563

* Year-to-date.

ENFORCEMENT: 07/01/2021 to 08/31/2021

Category of Violation	New	Follow-Up Action	Pending	Closed	Total
Asbestos	-	-	-	1	1
Industrial	1	-	2	2	5
Outdoor Burning	-	-	1	2	3
Fugitive Dust	-	-	-	-	-
Home Wood Heating	-	-	-	-	-
Totals	1	-	3	5	9

Attachment No. 4: Enforcement activities during these reporting periods for case details.

For perspective, here is how the total number of enforcement actions for calendar year 2021 compares 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	13
Notices of Violation with Civil Penalties	42	29	23	28	37	37	28	43	37	26	10

* Year-to-date.

OUTDOOR BURNING LETTER PERMITS: 07/01/2021 to 08/31/2021

There were no Outdoor Burning Letter Permits (OBLPs) issued in July and August.

ASBESTOS ABATEMENT: 07/01/2021 to 08/31/2021

During July and August, LRAPA received 70 notices of asbestos removal projects, 8 of which were schools (Oakridge School District, Shasta Middle School, Irving Elementary School, Danebo Elementary School, Twin Oaks Elementary School, Ridgeline Montessori School, Lowell School District and O'Hara Catholic 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 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	283
School Asbestos Abatement Notices (NESHAP)	61	53	24	21	24	27	28	24	16	25	18
Number of Asbestos Abatements Inspected	106	90	96	67	89	82	120	77	94	93	83

* 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 issued permits the Operations staff currently have in process.

Category of Permit Activity	Title V	ACDP	Registration	Total Active
New	-	3	-	3
Renewals	8	26	-	34
Modifications	1	1	-	2
Constructions	-	-	-	-
Registrations	-	-	-	-
Terminated Permits	-	-	-	-
Issued Permits	4	33	-	37
*Total	13	63	-	76

* Year-to-date.

UPDATE ON SOME NATIONAL ISSUES OF LRAPA INTEREST

The National Association of Clean Air Agencies (NACAA, the organization of state and local air directors) publishes an information packed *Washington Update* every Friday. Here are the weekly highlights from recent weeks.

Week of July 3-9, 2021

See: <https://www.4cleanair.org/wp-content/uploads/WashingtonUpdate-2021-07-09.pdf>

- EPA Announces \$50 Million in Air Grant Programs under the American Rescue Plan

Week of August 7-13, 2021

See: <https://www.4cleanair.org/wp-content/uploads/WashingtonUpdate-2021-08-13.pdf>

- NASA Creates Interactive Map of Sea-Level Rise Due to Climate Change

Week of August 14-20, 2021

See: <https://www.4cleanair.org/wp-content/uploads/WashingtonUpdate-2021-08-20.pdf>

- EPA Files Motion to Hold Litigation Challenging 2020 PM NAAQS Decision in Abeyance While Agency Completes Reconsideration
- Researchers Report on First Study to Quantify Degree to which increases in PM_{2.5} from Wildfires Contribute to COVID-19 Cases and Deaths in U.S
- Enforcement Alert Targets Metal Shredders
- South Coast Releases Results of Comprehensive Air Toxics Study

PUBLIC INFORMATION – Travis Knudsen

On-Going

Wildfire Efforts

July and August kept LRAPA's public affairs department busy with wildfire and smoke duties in addition to standard public affairs duties and responsibilities.

Throughout July and August, LRAPA public affairs staff participated on frequent smoke meetings with the Oregon Department of Environmental Quality (DEQ), Oregon Health Authority (OHA), fire resource advisories, as well as other local and tribal partners to coordinate smoke messaging and outreach. These meetings help LRAPA collaborate on areas of smoke concerns and provide recommended actions for people to protect their health.

LRAPA public affairs staff continue to participate on a daily (including weekend and holiday) cooperator/stakeholder meeting on the Middle Fork Complex fires. These daily meetings allow LRAPA to remain informed on firefighting approaches and resources. They also provide opportunity for LRAPA to share an air quality forecast for areas impacted by smoke with regional stakeholders in the area.

Wildfire duties and responsibilities absorb a substantial portion of staff time and will likely continue through September and early October, depending on the conclusion of the wildfire season in the Western North America.

Public Outreach Efforts

In addition to wildfires occupying much of LRAPA's public affairs time, progress continues to be made on outreach and public engagement.

LRAPA's online community survey remains open. In July, LRAPA mailed 24,926 postcards to residential addresses within 1 mile of facilities in – or soon to be in – Cleaner Air Oregon, as well as around Prairie Mountain School, in the Bethel neighborhood of Eugene. This mailing increased the number of responses to our survey and currently has 259 responses.

LRAPA will host its first facility specific community meeting on Seneca Sustainable Energy, LLC in early September. This meeting was originally scheduled to be a hybrid meeting with in-person participation possible at the Eugene Library, as well as online participation via Zoom webinar. However, after consulting with Lane County Public Health, LRAPA has moved this meeting to online-only to guard against increasing COVID-19 cases and subsequent hospitalization. Considerable public affairs staff time was committed to this meeting over the month August. LRAPA mail postcards on September 1 to any who live within a mile of Seneca Sustainable Energy, informing them of the opportunity to join the meeting and engage with LRAPA.

Public Meetings

In July and August, public affairs participated in two community meetings:

- Emerald Empire Kiwanis Club – Thursday July 22nd, 2021
 - Presented on LRAPA's role in Lane County
 - Answered specific questions on wildfire impacts on air quality and Cleaner Air Oregon
- J.H. Baxter Community Core Team – Tuesday July 27th, 2021
 - Heard more of community's concern on JHB & request community interest in an Oregon State Cancer Registry (OSCaR) study.

Media Contacts

DATE	MEDIA	PERSON	TOPIC
7/3	KVAL	Angelina Dixon	Clean air during wildfires
7/30	KLCC	Jen Wright	Oakridge air quality
8/2	KLC	Melorie Begay	Oakridge air quality
8/2	RG	Louis Krauss	Oakridge air quality
8/3	KVAL	Brisa Mendez	Oakridge air quality
8/8	KVAL	Keely McCormick	SSE Public Meeting
8/11	KLCC	Brian Bull	Oakridge air quality
8/11	RG	Adam Duvernay	Oakridge air quality
8/13	KPNW	Bill Lundun	Air Quality and Fire.AirNow.gov
8/13	Albany Herald	Troy Shinn	Air Quality in Willamette Valley
8/24	RG	Adam Duvernay	Oakridge Redesignation Request
8/27	RG	Adam Duvernay	Oakridge Redesignation Request

Meeting/Events

7/1	Monthly Air Toxics Technical and Communications Call
7/1	LRAPA/LCOG Website Redesign
7/2	LRAPA Municode Website Demo
7/6	LRAPA Board Member introduction Jenna Knee
7/6	LRAPA & DEQ SIP Meeting - Contingency Triggers/Maintenance Plan Process Planning
7/7	Oakridge Air Communications Group
7/8	LRAPA Board Meeting
7/12	Statewide Oregon Smoke Management and Response Call
7/12	JHB Cross-Agency Storymap
7/12	EPA/LRAPA/ODEQ Check-in
7/14	Statewide Oregon Smoke Management and Response Call
7/15	LRAPA & Beyond Toxics on Seneca Sustainable Energy Community Meeting
7/15	JHB Coordinating Agency Technical Team
7/16	Statewide Oregon Smoke Management and Response Call
7/19	Statewide Oregon Smoke Management and Response Call
7/19	LRAPA & Good Company check-in on TAG
7/20	JHB Cross-Agency Storymap
7/21	Statewide Oregon Smoke Management and Response Call
7/22	Emerald Empire Kiwanis Club Presentation
7/23	LRAPA & SSE on SSE Community Meeting
7/24	JHB Comms Planning Meeting
7/26	LRAPA, Good Company, & EPA check-in on TAG
7/26	JH Baxter Community Core Team Meeting
7/27	LRAPA, & Merlyn Hough on TAG items and historical decisions
7/27	Residential Wood Smoke Working Group monthly call
7/29	JHB Coordinating Agency Technical Team
8/2	Statewide Oregon Smoke Management and Response Call
8/2-8/31	Daily Middle Fork Wildfire Complex Cooperator Meeting
8/4	Statewide Oregon Smoke Management and Response Call

8/4	JHB Cross-Agency Storymap
8/5	JHB Comms Planning Meeting
8/9	EPA/LRAPA/ODEQ Check-in
8/10	Statewide Oregon Smoke Management and Response Call
8/11	JHB onsite visit
8/11	LRAPA/City of Eugene/Lane County/Beyond Toxics meeting on American Rescue Plan grant funding
8/13	Statewide Oregon Smoke Management and Response Call
8/16	Statewide Oregon Smoke Management and Response Call
8/17	US EPA Webinar: Community Roundtable Discussion on the American Rescue Plan
8/17	Purple Air install in Eugene
8/18	Statewide Oregon Smoke Management and Response Call
8/19	Statewide Oregon Smoke Management and Response Call
8/19	JHB Comms Planning Meeting
8/20	Statewide Oregon Smoke Management and Response Call
8/23	Statewide Oregon Smoke Management and Response Call
8/23	LRAPA & Good Company check-in on TAG
8/24	Purple Air install in Oakridge
8/25	Statewide Oregon Smoke Management and Response Call
8/26	LRAPA & DSConsulting on SSE's Community Meeting
8/26	JHB Cross-Agency Storymap
8/26	JHB Coordinating Agency Technical Team
8/27	Review of citizen complaints and questions regarding International Paper's emissions
8/27	LRAPA/ODEQ/EPA meeting on PM2.5 monitoring as a surrogate for PM10 monitoring
8/27	LRAPA meeting with James Hugo, Jessi Preston on International Paper
8/30	Statewide Oregon Smoke Management and Response Call
8/30	Review of Seneca Sustainable Energy's Title V air permit with Beyond Toxics
8/30	LRAPA, Good Company, & EPA check-in on TAG
8/31	LRAPA & SSE on SSE Community Meeting

Press Releases

8/2	Smoke will continue to impact Oakridge-Westfir for through at least Wednesday.
8/9	Seneca Sustainable Energy, LLC public meeting scheduled for September 8, 2021
8/10	Air quality advisory issued for eastern Lane County due to smoke impacts from wildfires
8/13	Middle Fork Complex fire continues to degrade air quality in Lane County
8/20	LRAPA's September 8 community meeting on Seneca Sustainable Energy, LLC moved to a virtual format amid rising COVID hospitalizations

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.

September 2021:

- Review 2021 Legislative Session and state general fund decisions.
- Reminder about local dues request to IGA partners for FY2023.
South Coast Releases Results of Comprehensive Air Toxics Study
- 2020 Wildfire Variance Extension

October 2021:

- Dashboard update and priorities review.
- Status report on Oakridge Air Program.
- 2021 Wildfire Cleanup Rule
- Director Six-Month Review
 - Diversity and Staff Identification Update
 - Organizational Staff chart

November 2021:

- Auditor report for FY2021.
- Approve local dues request to IGA partners for FY2023.

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.

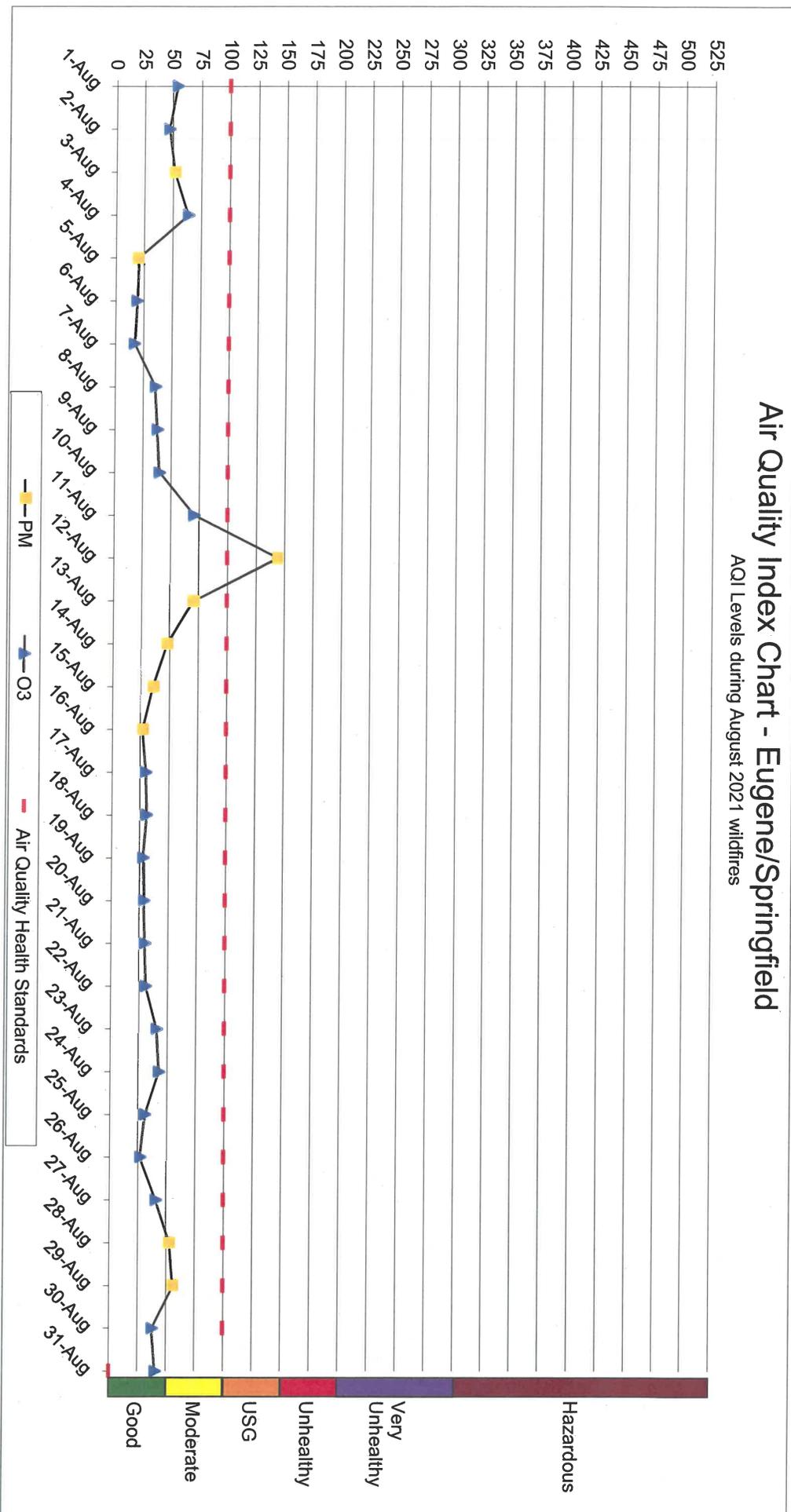
February 2022:

- 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:

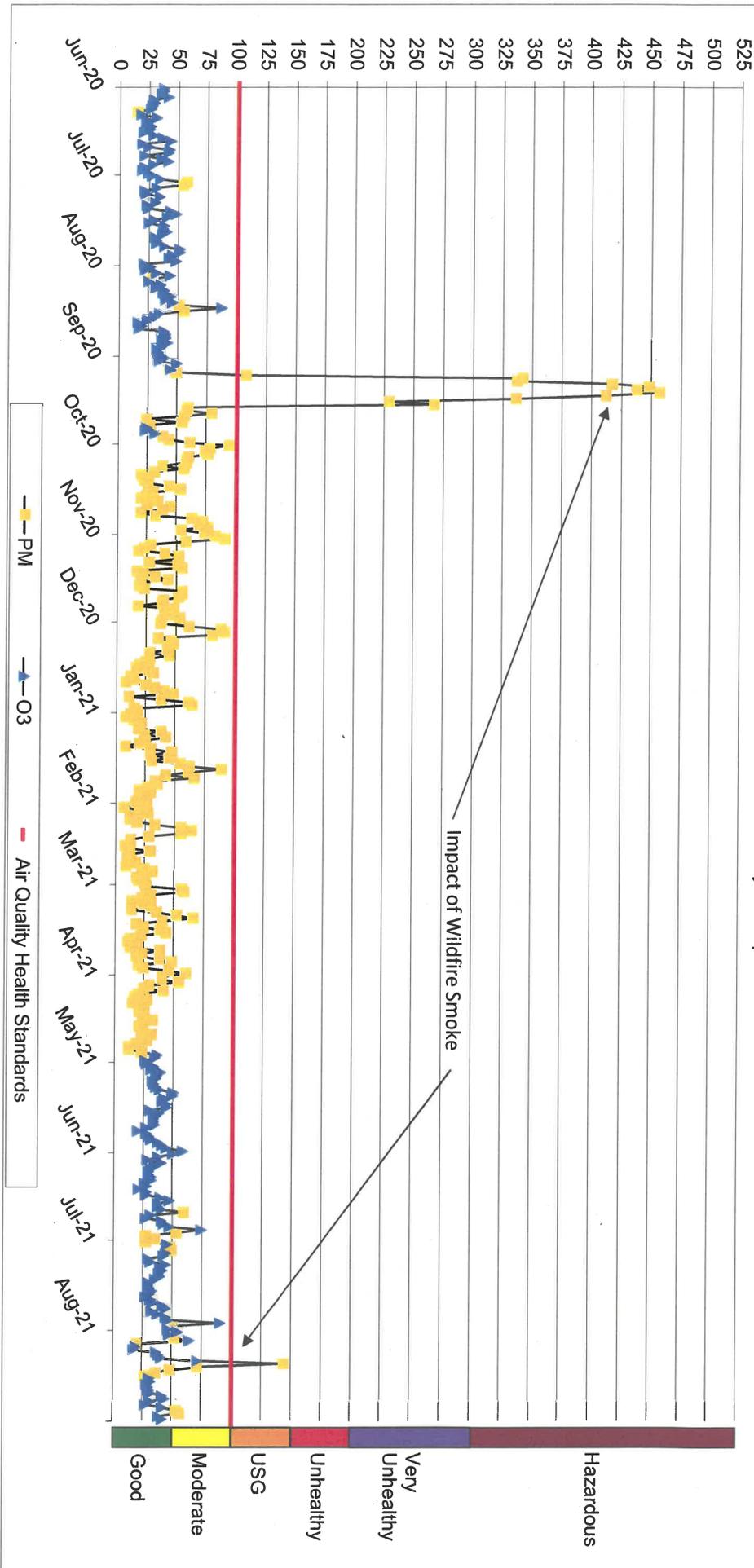
- First budget meeting on proposed budget for FY2023 (July 2022 – June 2023).

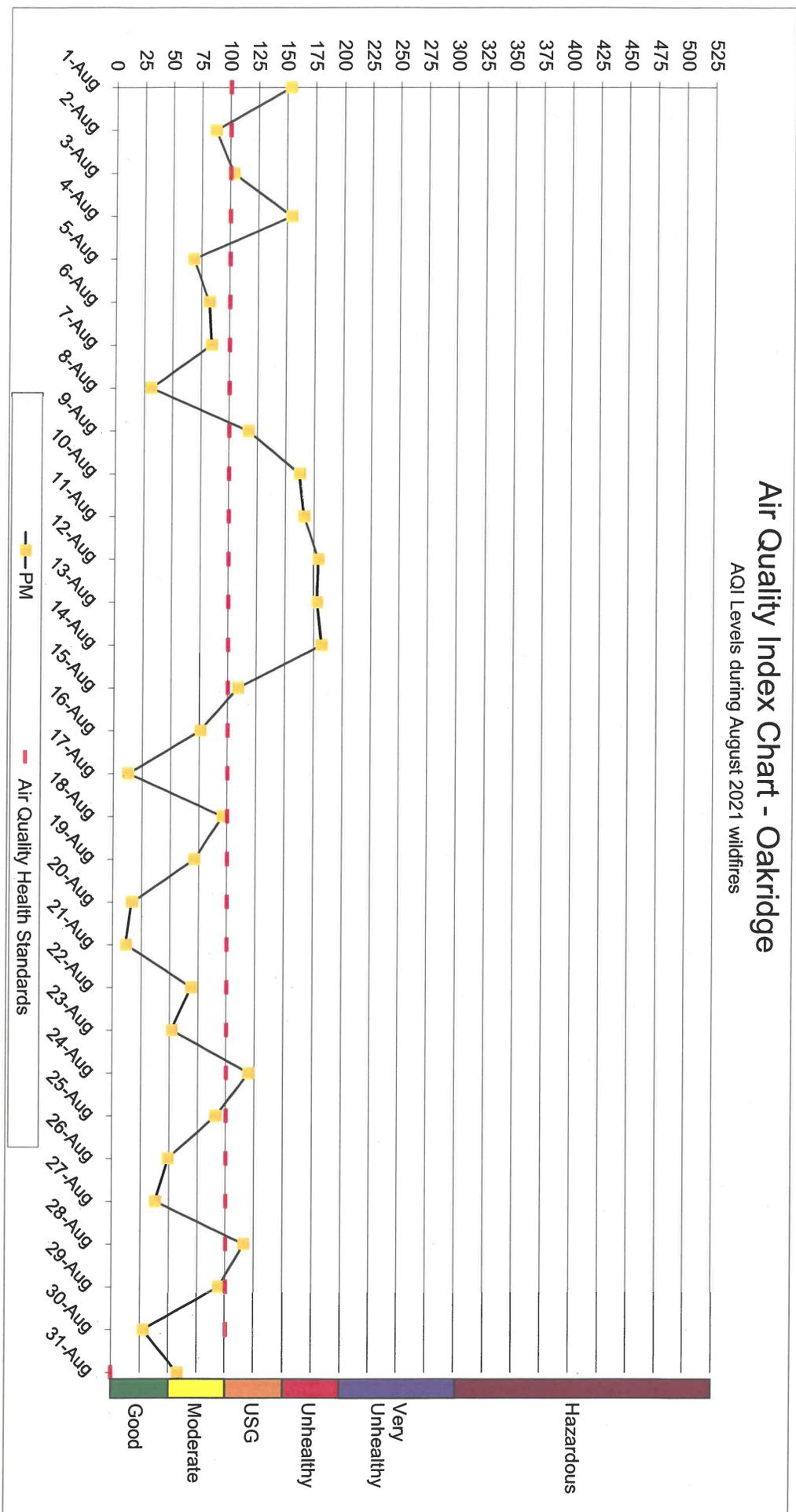
SAD/cmw



Air Quality Index Chart - Eugene/Springfield

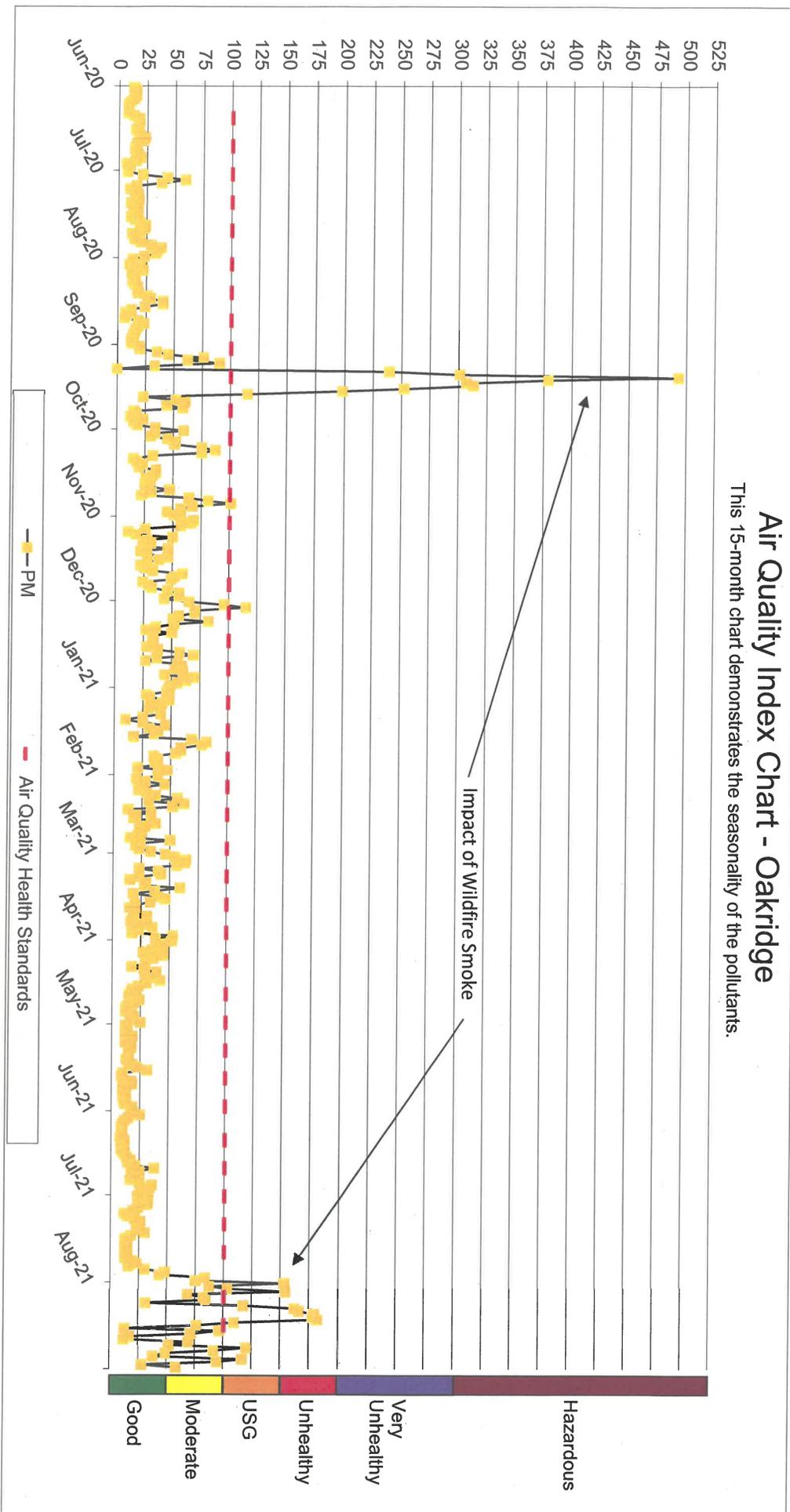
This 15-month chart demonstrates the seasonality of the pollutants.

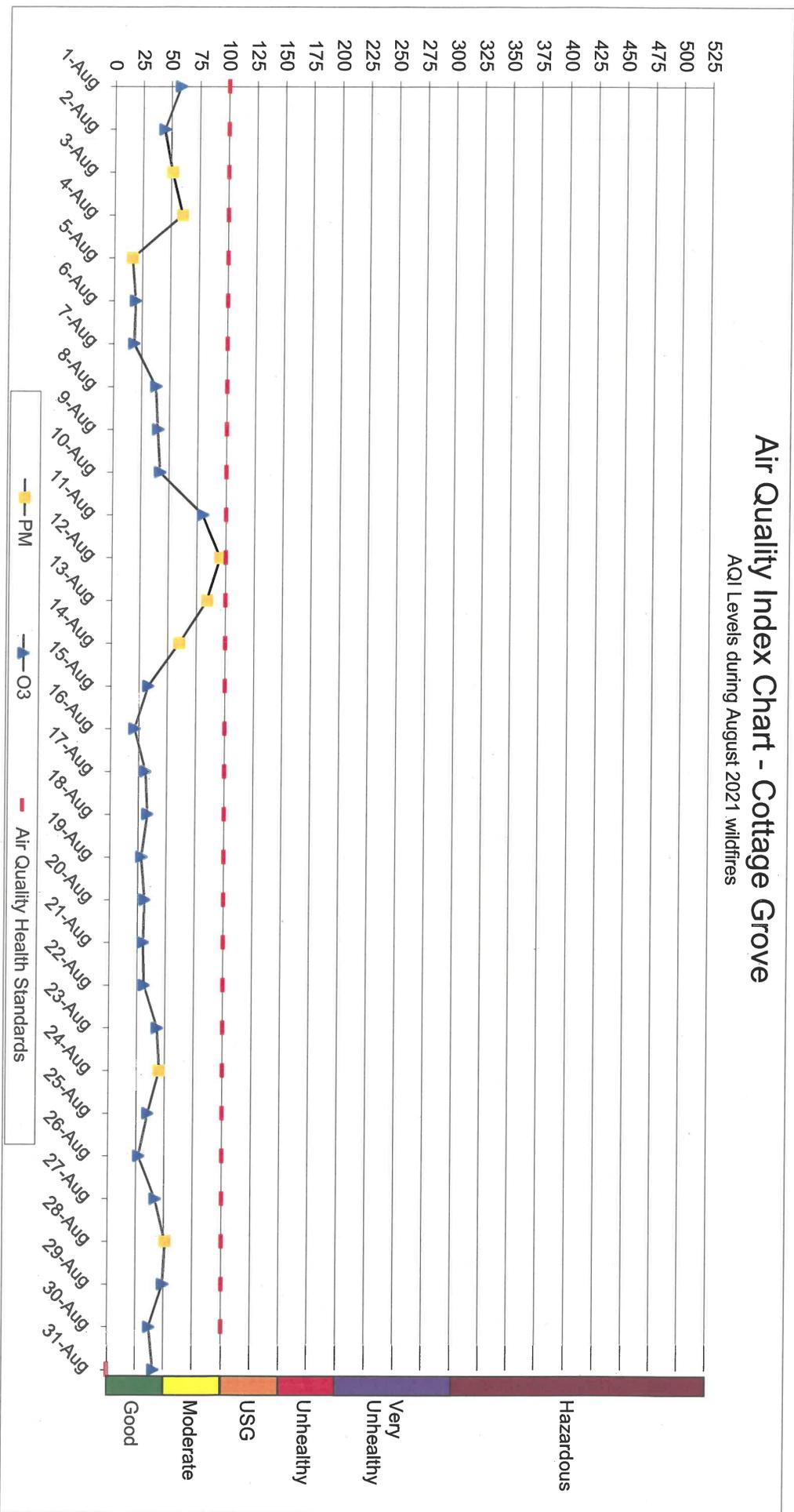




Air Quality Index Chart - Oakridge

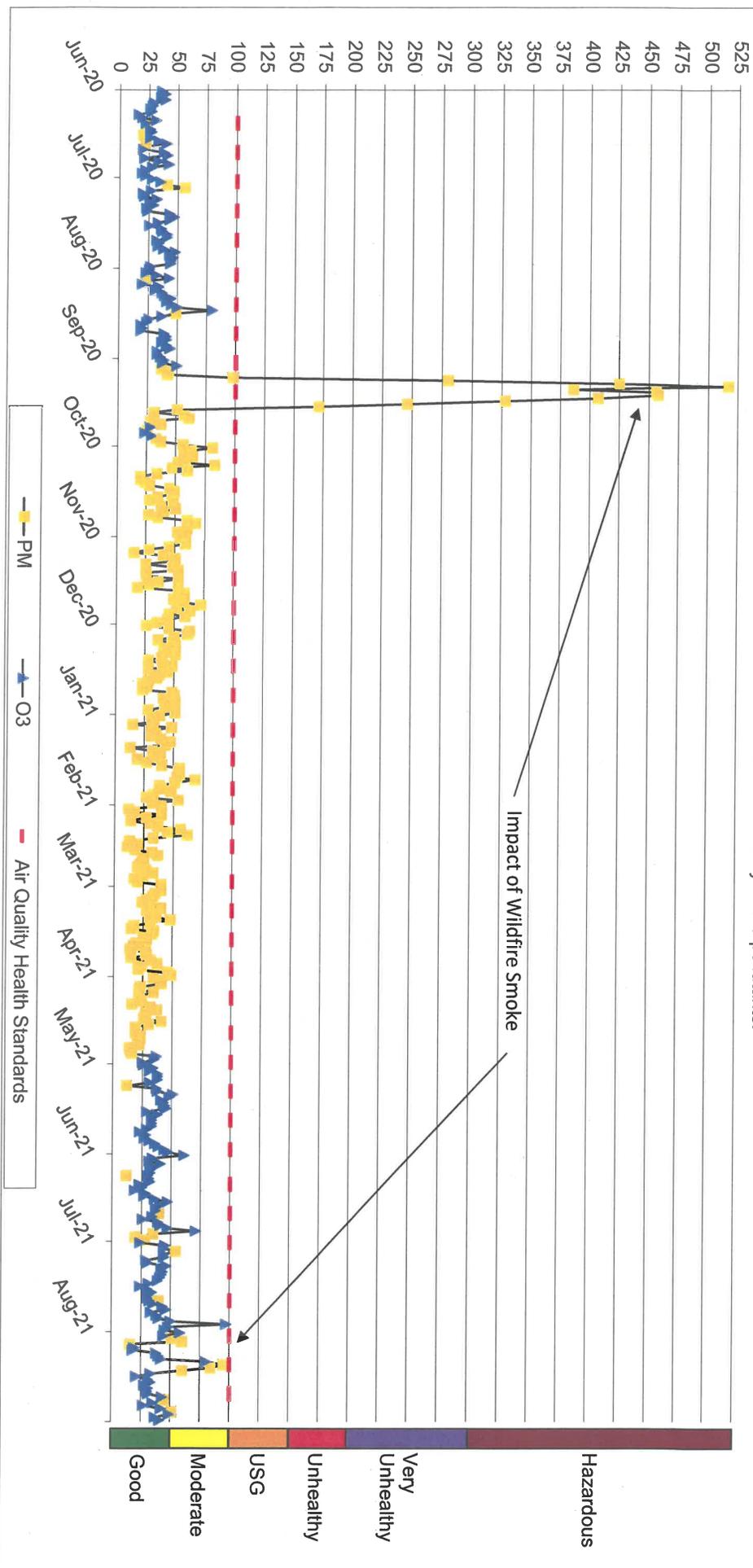
This 15-month chart demonstrates the seasonality of the pollutants.





Air Quality Index Chart - Cottage Grove

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



NEW/OPEN ENFORCEMENT ACTIONS STATUS REPORT

07/01/2021 -- 08/31/2021

Report of open and actions initiated since last report

NEW (New Enforcement actions issued: 07/01/2021 -- 08/31/2021)

1. RON'S OIL COMPANY (SPRINGFIELD)
 - A. Violation: On 6/1/21 fuel attendant topped off a vehicle driven by LRAPA. Attendant was not asked to top vehicle off and was immediately notified of violation. LRAPA contacted facility to advise of topping off violation. On 6/7/21 fuel attendant topped off a vehicle driven by LRAPA. Attendant was not asked to top off vehicle and was immediately notified of violation. LRAPA contacted facility to notify of topping off violation.
Action required: Provide training to all managers and attendants at the station that topping off is prohibited. Send documentation of training to LRAPA. Sign and date NON 3836 and return signed copy along with requested training documentation to LRAPA by 7/16/21.
 - B. Initial Action Taken: NON #3836 issued 07/01/2021
 - C. Subsequent Action: Submitted signed NON 3836 and documents of training all managers and attendants of topping off rules and regulations in ACDP 207085.
 - D. Resolution: CASE CLOSED on 07/15/2021

ACTIONS PERFORMED (Enforcement actions issued prior to 07/01/2021 with subsequent action in the current reporting period):

1. VOSBURG, ELIZABETH (VENETA)
 - A. Violation: Outdoor burning such as to cause a public nuisance or hazard; outdoor burning of prohibited materials; failure to conduct efficient outdoor burning; outdoor burning of construction/demolition debris without first obtaining an Outdoor Burning Letter Permit from LRAPA.
 - B. Initial Action Taken: NON #3832 issued 05/26/2021
 - C. Subsequent Action: NCP #2021-3832 (\$613) issued 06/04/2021: no response, default order judgment filed with Lane County for a lien on the property.
 - D. Resolution: CASE CLOSED on 08/13/2021

2. ATEZ, INC. (HARRISBURG)

- A. Violation: Failure to adequately wet asbestos containing materials during cutting or disjuncting operation; 43-015-11.E.(2) - Failure to carefully lower units or sections to the ground level, not dropping them or throwing them; 43-015-11.F.(1) - Failure to adequately wet the materials to ensure that they remain wet until they are disposed of in accordance with 43-015-19; 43-015-11.F.(2) - Failure to carefully lower the materials to the floor, not dropping or throwing them.
- B. Initial Action Taken: NON #3833 issued 06/16/2021
- C. Subsequent Action: NCP #2021-3833 (\$4800) issued 06/16/2021: Response to NCP received with request for reduction approved to \$2,400 - paid
- D. Resolution: CASE CLOSED on 07/16/2021

3. J.H. BAXTER & CO., EUGENE PLANT (EUGENE)

- A. Violation: 43-015-7- Failure to provide for an asbestos survey prior to commencing renovation or demolition of a facility; 43-015-10 - failure to abide by asbestos abatement notification and fee requirements; 43-015-11.C - failure to abide by asbestos abatement negative pressure enclosure requirements; 43-015-11.D.- failure to adequately wet asbestos containing material; 43-015-11.G.- failure to adequately clean project area at conclusion of abatement project; 43-015-11.H.- failure to secure asbestos containing waste at project site; 43-015-11.N.- open storage of asbestos containing waste; 43-015-11.P.- conducting an asbestos abatement without possessing a current license or certification; 43-015-19 - failure to abide by friable asbestos disposal requirements. LRAPA Title 43 "Asbestos Requirements" enclosed. J.H. Baxter & Co. may submit by June 11, 2021, an account of the events related to the violations alleged in this NON, action(s) to correct and remedy to prevent recurrence.
- B. Initial Action Taken: NON #3834 issued 06/02/2021
- C. Subsequent Action: NCP #2021-3834 (\$7800) issued 06/24/2021: request for reduction approved and reduced to \$5,200 with signed SFO – submitted signed SFO and paid
- D. Resolution: CASE CLOSED on 8/23/2021

4. CONTRERAS, JOSE (SPRINGFIELD)

- A. Violation: Outdoor burning when prohibited; outdoor burning such as to cause a public nuisance or hazard; outdoor burning of construction/demolition debris without first obtaining a Outdoor Burning Letter Permit from LRAPA
- B. Initial Action Taken: NON #3835 issued 05/26/2021

- C. Subsequent Action: NCP #2021-3835 (\$775) issued 06/04/2021
 - D. Resolution: CASE CLOSED on 08/11/2021
5. 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#2021-3837 (\$4,200) issued 7/7/2021 - paid
 - D. Resolution: CASE CLOSED on 07/20/2021

PENDING (Enforcement actions issued prior to 07/01/2021 with no subsequent action in the current reporting period):

1. JONES, ANTHONY R. (VENETA)
- A. Violation: Failure to promptly extinguish illegal outdoor burning; outdoor burning when prohibited; outdoor burning such as to create a nuisance; outdoor burning of prohibited materials (grass clippings); failure to conduct outdoor burning in an efficient manner
 - B. Initial Action Taken: NON #3818 issued 05/15/2020
 - C. Subsequent Action: NCP #2020-3818 (\$700) issued 05/27/2020: request for hearing scheduled and held on 11/13/2020; On 12/15/2020, the Hearing's Officer held up the violations however, adjusted the civil penalty from \$700 to \$600; Respondent has 30 days from 12/29/2020 to request an appeal or pay the \$600 adjusted civil penalty; 01/13/2021 Respondent request an Appeal to the LRAPA Board; 1/14/2021 Respondent was sent letter with details on requirements for the Request for Appeal to the Board - Respondent has 30 days from 02/13/2021 to submit Exceptions and Brief, Respondent submitted Appellee's Brief 02/11/2021; On 03/01/2021, LRAPA's attorney submitted Appellee's Answering Brief; no Reply Brief was submitted by Respondent; the Appeal to the LRAPA Board of Director's is scheduled and held on 07/08/2021; 07/08/2021 LRAPA Board upheld the Hearings Officer's Decision; Respondent has 60 days (9/8/21) to file a petition with the Oregon Court of Appeals for judicial review.
 - D. Resolution: PENDING

2. JOHNSON CRUSHERS INTERNATIONAL (EUGENE)

- A. Violation: Failure to conduct weekly monitoring for fugitive emissions; failure to maintain records of fugitive emission surveys; failure to conduct weekly point source emissions monitoring; failure to maintain records of point source emissions monitoring.
- B. Initial Action Taken: NON #3837 issued 06/14/2021
- C. Subsequent Action: PENDING
- D. Resolution: PENDING

3. OREGON INDUSTRIAL LUMBER PRODUCTS, I (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