



## Director’s Report for April 2023

**Meeting Date: April 13, 2023**  
**Department: Director’s Office**  
**www.lrapa.org**

**Agenda Item No. 7**  
**Staff Contact: Steven A. Dietrich**  
**Contact Telephone: 541-736-1056 x 216**

April 2023 AQI charts and stats.

Site	Date	Max AQI	Pollutant
Eug/Spfld	18-Mar-23	63	PM
Oak	18-Mar-23	59	PM
CottGrv	18-Mar-23	30	PM

AQI	Eug/Spfld	Oak	CottGrv	AQI Range	PM2.5 Range, ug/m3
Good	27	29	31	0-50	0-12
Moderate	4	2	0	51-100	12.1-35.4
USG	0	0	0	101-150	35.5-55.4
Unhealthy	0	0	0	151-200	55.5-150.4
Very Unhealthy	0	0	0	201-300	150.5-250.4
Hazardous	0	0	0	301-500	250.5-500

**Attachment No. 1: Air quality index charts for Eugene/Springfield (March 2023)**

**Attachment No. 2: Air quality index charts for Oakridge (March 2023)**

**Attachment No. 3: Air quality index charts for Cottage Grove (March 2023)**

**COMPLAINTS: 3/01/2023 to 3/31/2023 [TOTAL 53]**

**Smoke complaints:**

- 17 - Outdoor burning
- 8 - Home wood heating

**Industry:**

- 1 – Commercial Metal Prod
- 2 - IP, Spfld (odor)

**General Air Quality:**

- 2-General AQ

**Unknown:**

- 2 – Autobody Activities
- 1 – Castle Storage – Fumes
- 1 - Asbestos

**Unknown:**

- 12- Unknown odors

**Slash Burning:**

- 6- Slash Burning

**Fugitive Dust:**

- 1 – Sawdust

Year	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	*2023
Dust	30	14	25	32	25	26	15	17	26	12	1
Ag Burning / Spraying	17	4	12	9	1	0	6	2	7	2	2
General Air Quality	26	30	15	20	14	6	12	4	8	1	6
Home Wood Heating	219	121	342	130	197	126	128	74	57	67	22
Industry	122	127	52	58	74	50	170	100	336	198	32
Outdoor Burning	321	279	251	266	281	351	402	423	243	292	76
Slash Burning	5	7	11	26	13	24	16	12	10	6	8
Miscellaneous	52	57	85	164	138	66	67	59	40	102	9
Unknown	14	35	46	56	63	29	39	74	71	45	19
<b>Total</b>	<b>806</b>	<b>674</b>	<b>839</b>	<b>761</b>	<b>806</b>	<b>678</b>	<b>855</b>	<b>765</b>	<b>798</b>	<b>725</b>	<b>175</b>

**\* Year-To-Date**

**ENFORCEMENT: 03/01/2023 to 03/31/2023**

<b>Category of Violation</b>	<b>New</b>	<b>Follow-Up Action</b>	<b>Pending</b>	<b>Closed</b>	<b>Total</b>
Asbestos	1	-	-	-	<b>1</b>
Industrial	1	-	2		<b>3</b>
Outdoor Burning	-	-	3		<b>3</b>
Fugitive Dust	-	-	-	-	-
Home Wood Heating	-	-	-	-	-
<b>Totals</b>	<b>2</b>	-	<b>5</b>	-	<b>7</b>

## **NEW/OPEN ENFORCEMENT ACTIONS STATUS REPORT**

03/01/2023 -- 03/31/2023

Report of open and actions initiated since last report

### **NEW: 03/01/2023 -- 03/31/2023**

#### **1. JOHN A. RANKIN AND STEVE FOWLKES (SPRINGFIELD) 2035/2041 MAIN STREET**

- A. Violation: 43-015(10)- ASBESTOS ABATEMENT NOTIFICATION REQUIREMENTS. Except as provided for in 43-015-8, written notification of any asbestos abatement project must be provided to the Agency on a form prepared by and available from the Agency, accompanied by the appropriate fee; 43-015(11)(C)- Enclose the area of the asbestos-containing materials to be abated, in a negative pressure enclosure prior to abatement unless prior approval has been granted by the agency; 43-015(11)(G)- The asbestos abatement project area shall be adequately cleaned at the conclusion of the project to assure removal of all asbestos debris; 43-015(11)(N)- Open storage or open accumulation of friable asbestos-containing material or asbestos containing waste material is prohibited; 43-015(11)(P)- No person shall conduct an asbestos abatement project unless they possess a current asbestos abatement Contractors license or worker's certification, issued by the Department under OAR 340-248-040 or OAR 340-248-0120 and OAR 340-248-0130, respectively, unless exempted by 43-015-8 and/or 43-015-9; 43-015(11)(S)- A certified supervisor is required to be present on each asbestos abatement project other than a small-scale short-duration activity; 43-015(11)(T)- An owner or operator of a facility shall not allow any persons other than those employees of the facility owner or operator who are appropriately certified or a licensed asbestos abatement contractor to perform an asbestos abatement project in or on that facility unless exempted by 43-015-8 or 43-015-9; 43-015-19(B)- Persons disposing of asbestos-containing waste material must notify the landfill operator of the type and volume of the asbestos-containing waste material; 43-015(19)(B)(1)- All asbestos-containing waste materials must be adequately wetted to ensure that they remain wet until delivered to an authorized landfill, and either: (a) processed into non-friable pellets or other shapes; or (b) packaged in leak-tight containers such as two plastic bags with a minimum thickness of 6 mil., or fiber or metal drum. Containers must be labeled as follows: (i) the name of the asbestos waste generator and the location where the asbestos waste was generated; and (ii) a warning label that states: DANGER Contains Asbestos Fibers Avoid Creating Dust Cancer and Lung Disease Hazard Avoid Breathing Airborne Asbestos Fibers Alternatively, warning labels specified by 29 CFR 1926.1101(k)(7)(8/19/94) may be used; 43-105(19)(E)- All asbestos-containing waste material must be deposited as soon as possible by the waste generator at: (1) An asbestos-containing waste disposal site authorized by the Department and operated in accordance with the provisions of this rule;
- B. Initial Action Taken: NON #3877 issued 03/06/2023
- C. Subsequent Action: NCP #2023-3877 (\$10,400) issued 03/06/2023
- D. Resolution: PENDING

#### **2. FOX LUMBER (COTTAGE GROVE) 77676 HW 99**

- A. Violation: Conducted outdoor burning in violation and prohibited by General Air Contaminant Discharge Permit #202836 (ACDP 202836) in Condition 10.6.
- B. Initial Action Taken: NON #3879 issued 03/06/2023
- C. Subsequent Action: NCP #2023-3879 (\$2,600) issued 03/06/2023:
- D. Resolution: PENDING

**PENDING (Enforcement actions issued prior to 03/01/2023 with no subsequent action in the current reporting period):**

**1. 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 06/22/2022
- C. Subsequent Action: PENDING
- D. Resolution: PENDING

**2. PETROCARD INC. (GOSHEN) 85947 FRANKLIN BVLD**

- A. Violation: The permittee failed to submit in a timely manner performance testing records to LRAPA which demonstrate compliance with vapor testing requirements outlined in permit conditions 5.1.a and 5.1.b. On 2/25/2022 the permittee was notified by LRAPA that they had exceeded the annual throughput threshold of 480,000 gallons of gasoline in 2019 and were therefore subject to the vapor recovery testing requirements outlined in the permit. On 4/8/2022 LRAPA was advised that vapor recovery testing could not be completed since the lines were manifolded and the issue was escalated to construction to isolate the lines. On 7/7/2022 LRAPA called and emailed the permittee requesting an update. On 8/2/2022 LRAPA called and emailed the permittee requesting an update. Permittee responded advising that they were still working to fix the issue. On 10/5/2022 LRAPA emailed the permittee requesting an update. On 10/26/2022 LRAPA called and emailed the permittee requesting an update.
- B. Initial Action Taken: NON #3872 issued 11/03/2022
- C. Subsequent Action: NCP #2022-3872 (\$3,000) issued 12/08/2022; request for reduction under review while waiting for source test report submission.
- D. Resolution: PENDING

3. MEYER, TAYLOR (VENETA) 87061 GREENRIDGE DRIVE

- A. Violation: Outdoor burning of any materials which normally emits dense smoke, noxious odors, and hazardous air contaminants and for not promptly extinguishing any burning that is in violation of LRAPA's Title 47-015(e).
- B. Initial Action Taken: NON #3873 issued 11/16/2022
- C. Subsequent Action: NCP #2022-3873 (\$3,496) issued 11/16/2022, returned by USPS; reissued by Legal Server; no response, default order judgment in process for a lien on the property
- D. Resolution: PENDING

4. ANDERSON-MORTENSEN, ELLEN (SPRINGFIELD) 85 NEPTUNE AVENUE

- A. Violation: Outdoor burning of any materials which normally emits dense smoke, noxious odors and hazardous air contaminants.
- B. Initial Action Taken: NON #3875 issued 02/22/2023
- C. Subsequent Action: NCP #2022-3875 (\$250) issued 02/22/2023; no response, default order judgment in process for a lien on the property
- D. Resolution: PENDING

5. VENIAMIN TODORIKO (EUGENE) 5039/5041 BARGER DRIVE

- A. Violation: 43-015(7) - Failure to obtain an asbestos survey from an accredited asbestos inspector prior to conducting the demolition of a facility.
- B. Initial Action Taken: NON #3876 issued 01/13/2023
- C. Subsequent Action: NCP #2022-3876 (\$2,200) issued 01/13/2023; no response, default order judgment in process for a lien on the property
- D. Resolution: PENDING

*For a perspective of the total number of enforcement actions for calendar year 2023 compared to previous years*

Year	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	*2023
Notices of Non-compliance and Warnings	51	36	38	41	39	41	55	15	21	24	1
Notices of Violation with Civil Penalties	23	28	37	37	28	43	37	26	17	24	1

**OUTDOOR BURNING LETTER PERMITS: 03/01/2023 to 03/31/2023**

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

1. Issued Special Letter Permit 20B23-02-02 on March 1 to Staffordshire HOA (Jack Andress), 34621 Devonshire Drive Eugene, to burn 60 cubic yards of commercial debris located at the same address.
2. Issued Special Letter Permit 20B23-02-03 on March 4 to Scott Polhamus/Oregon Woods Inc., P.O. Box 11680, Eugene, to burn 40 cubic yards of land clearing debris located at 28165 Spencer Creek Road, Eugene.

**ASBESTOS ABATEMENT: 03/01/2023 to 03/31/2023**

During March, LRAPA received 46 notices of asbestos removal projects, one of which was a school (Marist High 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 2023 compares to previous years:**

<b>Year</b>	<b>2013</b>	<b>2014</b>	<b>2015</b>	<b>2016</b>	<b>2017</b>	<b>2018</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>*2023</b>
<b>Total Asbestos Abatement Notices</b>	351	352	426	444	543	428	488	439	408	465	118
<b>School Asbestos Abatement Notices (NESHAP)</b>	24	21	24	27	28	24	16	25	20	16	2
<b>Number of Asbestos Abatements Inspected</b>	96	67	89	82	120	770	94	93	104	115	23

\* Year-To-Date.



**PERMITTING (TITLE V AND ACDP): 03/01/2023 to 03/31/2023**

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.

<b>Category of Permit Activity</b>	<b>Title V</b>	<b>ACDP</b>	<b>Registration</b>	<b>Total Active</b>
<b>New</b>	-	6	-	6
<b>Renewals</b>	2	18	-	20
<b>Modifications</b>	3	6	-	9
<b>Constructions</b>	1	1	-	2
<b>Registrations</b>	-	-	-	-
<b>Terminated Permits</b>	-	-	-	-
<b>Total Issued Permits Year-to-date</b>	-0-	9	-	9

March 2023 Public Affairs, Monthly Summary

**Smoke management from wood stoves, outdoor burning, and wildfires**

Throughout February, smoke management focused on curtailing home wood heating during prolonged air stagnation periods. No yellow or red home wood heating days were issued in March for Eugene, Springfield, and Oakridge, thanks to Oregon's active weather pattern. Home wood heating season extends until May 31 under LRAPA's rules. However, the Pacific Northwest's weather pattern usually shifts by mid-April, making air stagnation and reduced air quality from wood stove use uncommon. Extended forecasts predict continued active weather in April, so LRAPA does not foresee the need for home wood heating curtailment or outdoor burning restrictions during the first half of the month.

Since the home wood heating season runs until May 31, LRAPA continues to publish daily advisories for Eugene/Springfield and Oakridge. During this time, LRAPA prioritizes staff resources to assess potential air stagnation episodes and the need for yellow/red advisory days.

The spring outdoor burning season started on March 1 and lasts until June 15, unless the Oregon Department of Forestry or Lane Fire Defense Board curtails it based on fire danger conditions. LRAPA maintains daily burning status advisories on their website throughout the season.

LRAPA staff participated in a Potential Operational Delineations (PODs) workshop, which involves strategically dividing tasks and responsibilities among agencies, organizations, and personnel to optimize wildfire prevention, containment, and mitigation efforts. PODs can include designating geographic areas for various management activities, such as controlled burns, fuel reduction, and firefighting coordination. LRAPA works to position itself to best engage with land and forest managers in Lane County to be more responsive and collaborative to better minimize wildfire risks.

LRAPA is preparing for a Rivers to Ridges (R2R) ecological prescribed fire planning work session in early April. This coordination anticipates an outdoor burn permit application from R2R for ecological prescribed burning in 2023. LRAPA will outline additional permit conditions, considering current air quality before authorizing a burn.

**Public outreach efforts**

LRAPA's Executive Director, Steve Dietrich, presented on the organization's role as an air regulator in Lane County to the Cottage Grove City Council. Following the presentation, Director Dietrich answered questions and engaged in discussions with the council members.

LRAPA collaborated with the Pollution Prevention Coalition (P2C) to host a booth at the Lane County Home and Garden Show. Over the three-day event, LRAPA and P2C partners educated participants on pollution prevention efforts, covering topics such as asbestos, wildfire smoke, wood stoves, and general air quality.

**Public Meetings, Hearings, and Events**

Public affairs were present or participated in the following events:

- Lane County Home & Garden Show – Friday, March 10 to Sunday, March 12.
- Cottage Grove City Council Meeting – Monday, March 13, 2023 | 7:00 pm – 8:00 pm

Media	DATE	MEDIA	REPORTER	TOPIC
Contacts	03/10/2023	UofO Journ. Project	Olivia Bennett	Lane County Air Quality
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.

### January 2023:

- Executive Session.
- Partners Fees – FY 2024.
- Preview upcoming appointments on board and committees.
- Status report on Oakridge Air Project.
- Work Session

### February 2023:

- Nominations/Appoint Board Chair and Vice Chair.
- Nominations/Appoint new Budget Committee Members and Budget Officer.
- Review multi-year budget forecast for FY2023-2027.

### March 2023:

- First Budget meeting.

### April 2023:

- Second Budget meeting.

### May 2023:

- Final Budget meeting.
- Dashboard Report.
- Status report on Oakridge Air Project.
- Discuss process for Director's Performance Review.
- Board meeting time decision.

### June 2023:

- Director's Performance Review (Executive Session).

### July 2023:

- Audit Report.

### **August 2023 – No Meeting**

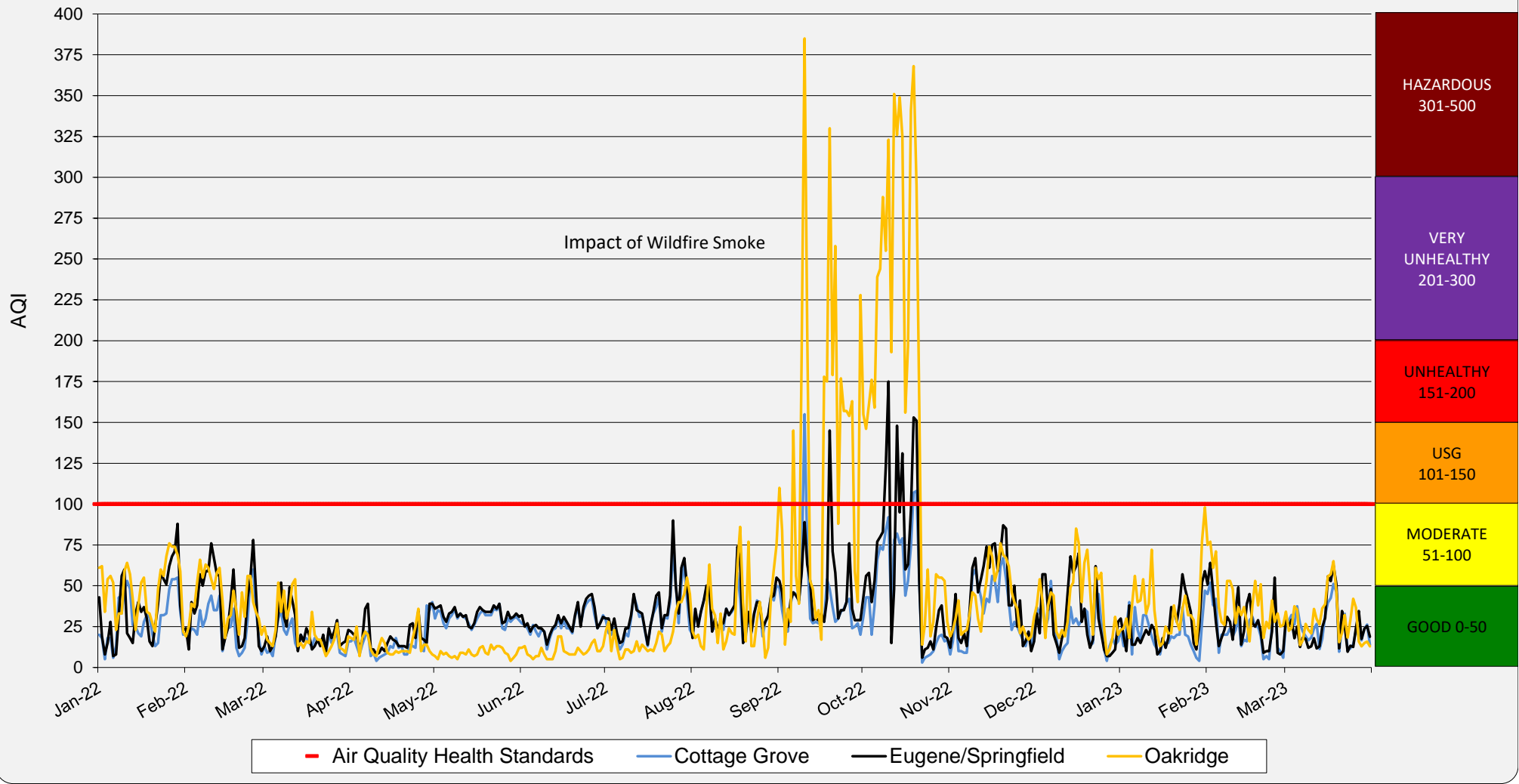
### September 2023:

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

SAD/dd

# Daily Air Quality Index Chart

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



# Daily PM2.5 Levels

Daily Sampling, NAAQS Exceedance is Triggered on the 8th High

