



Attachment A

SUMMARY AND RESPONSE TO COMMENTS TO PUBLIC NOTICE FOR THE DRAFT SOLID WASTE PERMIT FOR GRIMM'S FUEL COMPANY COMPOSTING FACILITY

Public Comment Period:
June 2, 2015 to July 31, 2015
(Including the public hearing held on July 08, 2015)

The Oregon Department of Environmental Quality (DEQ) received 48 separate written comments during the comment period. Some individuals submitted multiple pieces of correspondence and some correspondence was signed by more than one individual (such as couples, one letter signed by 23 residents of the Pony Ridge Subdivision, and one letter signed by 864 individuals in support of renewal of Grimm's permit). At the public hearing eight individuals provided verbal comments (seven of which also provided written comments).

DEQ is committed to including Oregonians in permitting actions, through DEQ's public involvement process, by providing an opportunity for them to express their views, concerns, values, and ideas. DEQ undertook a thorough public involvement process to obtain feedback on Grimm's draft compost permit, by providing information to neighbors located within a quarter mile of the proposed facility, DEQ's established mailing lists (people interested in DEQ solid waste permits), and to key individuals maintaining additional distribution lists to which the public notice was forwarded. DEQ notified these groups of the public comment period, the public hearing, and the extended public comment period. In addition, DEQ published its notices in the Oregonian and on DEQ's public notice webpage.

DEQ summarized the comments received by topic, followed by DEQ's response. The transcript of the public hearing and the written comments received are included as an attachment to this document.

Land Use and Livability

Comment: DEQ received multiple comments suggesting Grimm's should not continue to operate at its current location and should instead be sited at an alternate location farther from populated areas where environmental impacts, human health impacts, livability, and economic impacts to home and property values would not be as significant. DEQ also received comments that if Grimm's is to operate on the current site, livability of neighboring residential areas should receive more consideration and Grimm's should modernize composting operations in ways that will reduce impacts. (*Sherman, July 28, 2015; Bloomfield & Paster, August 06, 2015; Roger, July 21, 2015; Callahan, July 28, 2015; Rad, July 27, 2015; Saedi, July 8, 2015; Virginia Green, July 26, 2015; joakman259@aol.com, July 30, 2015; McGuire, June 22, 2015; Birkeland, July 8, 2015; Stephenson, July 29, 2015; Glover, July 24, 2015; Mahvash Saedi, July 31, 2015; Hamilton, July 31, 2015; Muller, July 30, 2015; Holland, July 31, 2015; Gonzales, July 8, 2015; Federspiel, July 31, 2015*)

DEQ Response: DEQ does not have jurisdiction over land use determinations concerning the compatibility (economic or otherwise) of a facility with surrounding land uses. The local jurisdiction, the City of Tualatin, is responsible for land use decisions and DEQ relies upon their expertise to comprehensively assess facility compatibility with surrounding land uses. DEQ received a completed Land Use Compatibility Statement (LUCS) from the City of Tualatin dated

May 8, 2012 as part of Grimm's permit application. That LUCS grants approval for yard debris composting and residential food waste composting (with conditions) on tax lots 1800 and 1900.

DEQ also does not dictate what type of composting operations a business uses. DEQ rules require that a compost operation meet specific environmental performance standards for water quality protection, pathogen reduction and odor control. The DEQ permit will require that Grimm's operate its compost facility to meet those performance standards.

Screening and Human Health Risk Assessment

Comment: DEQ received multiple comments requesting the results of an assessment of human health risks posed by the Grimm's facility. (*Beheler, July 29, 2015; Davis, July 24, 2015; Ouellette, July 27, 2015; Federspiel, July 31, 2015; Darby, July 31, 2015; Hamilton, July 31, 2015; Guinta, July 25, 2015; Virginia Green, July 26, 2015*)

DEQ Response: In February 2011 DEQ completed a screening of Grimm's to determine whether the facility poses a risk to human health or the environment. The relative degree to which composting operations at Grimm's may present a risk of adverse effects to surface water and groundwater, and the likelihood the facility will create unacceptable odor problems was evaluated, as required by Oregon Administrative Rule (OAR) 340-096-0080. The screening is not intended to be a comprehensive deterministic or probabilistic risk assessment. Rather, the screening's function is to determine what level of permitting will be required (Registration Permit or Individual Permit). Because of potential risk categories generally identified during the screening process, Grimm's is required to operate under an Individual Compost Permit. DEQ has re-titled this section of the permit evaluation memo to read "Risk Screening Evaluation Results".

The Individual Compost Permit that DEQ is issuing to Grimm's requires an updated operations plan be submitted to DEQ within 60 days of permit issuance. The operations plan must include protocol for monitoring process controls (oxygen, temperature, moisture, and compost retention time). Those process controls will have to be maintained within acceptable ranges to meet performance standards stipulated in the permit and in OAR, including: minimizing odor impacts to the greatest extent practicable; preventing attraction, harborage and propagation of vectors (rats, birds, flies, etc.); meeting pathogen reduction requirements; and minimizing impacts to surface water and groundwater.

The operations plan must also include an odor minimization plan addressing: management of malodorous feedstocks; procedures for immediately responding to odor complaints, investigating to determine the cause of any odor emissions, and promptly remedying any odor resulting from failure to meet performance standards; procedures to avoid anaerobic conditions; forming windrows and piles into a size and shape favorable to minimizing odors; and managing material appropriately during weather conditions likely to increase offsite odor impacts.

Air Quality Permit

Comment: DEQ received multiple comments concerning Grimm's impact on surrounding air quality. Some comments questioned why Grimm's isn't required to have an air quality permit and/or conduct routine air quality monitoring for odor, dust, and other air emissions containing

potentially toxic pollutants. (*Guinta, July 25, 2015; Colin Green, July 31, 2015; Saedi, July 30, 2015; Hamilton, July 8, 2015; Federspiel, July 31, 2015*)

DEQ Response: DEQ is currently issuing a Solid Waste Individual Compost Permit. The DEQ Solid Waste Program has referred all comments concerning air quality to the DEQ Air Quality Program, which is responsible for determining if compost facilities in Oregon should be required to obtain DEQ air quality permits. If the DEQ Air Quality Program determines composting operations require air quality permits, DEQ will work with each composting facility to comply with applicable air quality requirements. The DEQ Air Quality Program can be contacted at 503-229-5359 or airquality.info@deq.state.or.us.

Employee Health Risks

Comment: DEQ received a comment concerning the potential health impacts of Grimm's operation on its own employees. (*Ouellette, July 27, 2015*)

DEQ Response: The Oregon Occupational Safety and Health Administration (OSHA) is responsible for enforcing the State's workplace safety and health rules. OSHA conducts inspections, responds to complaints, and provides consultative services in order to advance and improve workplace safety and health for all workers in Oregon. Oregon OSHA can be contacted at 503-378-3272, or 800-922-2689, or tech.web@oregon.gov.

Protection of Sensitive Populations

Comment: DEQ received multiple comments expressing concern about Grimm's potential to have inordinate impacts on the health of sensitive populations (such as children and the elderly) due to the disproportionate concentration of those particularly sensitive groups in surrounding residential areas. (*Rad, July 27, 2015; Davis, July 24, 2015; Robb, July 27, 2015; Beheler, July 29, 2015; Callahan, July 28, 2015; Rogers, July 21, 2015; Sherman, July 28, 2015; Bloomfield & Paster, August 06, 2015; Darby, July 31, 2015; Hamilton, July 31, 2015; Guinta, July 25, 2015; Saedi, July 30, 2015*)

DEQ Response: DEQ has determined that compliance with the compost permit being issued to Grimm's will be protective of public health for all populations. DEQ will require Grimm's to meet the performance standards, and other conditions in the permit that ensure those protections, through routine inspection and enforcement action if necessary.

Feedstocks

Comment: DEQ received multiple comments concerning negative impacts (including increased odor, environmental impacts, and human health impacts) that might result from Grimm's potential acceptance of Type 3 feedstocks (including residential food waste mixed with residential yard debris). (*Williams, July 27, 2015; Callahan, July 28, 2015; Robb, July 27, 2015; Davis, July 24, 2015; Ouellette, July 27, 2015; Rad, July 27, 2015; 23 residents of Pony Ridge, July 8, 2015; joakman259@aol.com, July 30, 2015; McGuire, June 22, 2015; Federspiel, July 31, 2015; Darby, July 31, 2015; Hamilton, July 31, 2015; Virginia Green, July 26, 2015; Saedi, July 30, 2015; Holland, July 31, 2015; Bixby, July 08, 2015*)

DEQ Response: Grimm's received land use approval from the City of Tualatin to accept Type 3 residential food waste feedstocks. The DEQ permit further restricts the potentially allowable Type 3 feedstocks to curbside-collected residential food waste mixed with yard debris only. The DEQ solid waste permit being issued does not allow Grimm's to accept any Type 3 feedstocks without first completing the following steps.

1. Obtain DEQ concurrence that facility compost operations are in compliance with the permit conditions and applicable compost regulations;
2. Submit an updated operations plan (including an odor minimization plan) for DEQ review and approval;
3. Submit facility complaint and response records for the last six months to DEQ for review;
4. Submit documentation demonstrating written approval from Metro to accept residential food waste.
5. Conduct a small-scale residential food waste demonstration project showing that composting food waste can be done in compliance with regulatory performance standards and submit a detailed evaluation report to DEQ describing how the demonstration project operations meet those standards.
6. After DEQ review of the demonstration project, obtain final DEQ approval for the ongoing acceptance of food waste.

Compost Pile Height, Method, and Accurate Representative Monitoring

Comment: DEQ received multiple comments concerning Grimm's composting pile height and method of composting. Concerns include: pile height increases over the years, relatively large pile heights generating more odors than smaller ones, the difficulty of accurately measuring oxygen levels in large piles (with the required 72-inch probe), dust becoming airborne off of piles and falling out on adjacent properties (see "*Dust*" section of this response to comments), and removal of the pile height reduction plan from the previously issued permit that was appealed. Commenters also suggested that other compost facilities in the region have demonstrated smaller compost piles formed into windrows may actually not be less odorous than larger piles. (*Williams, July 27, 2015; Ouellette, July 27, 2015; Giunta, July 8, 2015; Saedi, July 27, 2015; 23 residents of Pony Ridge, July 8, 2015; Virginia Green, July 26, 2015; Birkeland, July 8, 2015; Federspiel, July 31, 2015; Shoemaker, July 23, 2015; Darby, July 31, 2015; Titus, July 23, 2015; Hamilton, July 31, 2015; Muller, July 30, 2015; Colin Green, July 31, 2015; Bixby, July 8, 2015*)

DEQ Response: In lieu of a pile height reduction plan, DEQ has determined that appropriate composting will be achieved more effectively through monitoring of compost processing parameters (oxygen level, temperature, moisture content, retention time) that will indicate

whether composting is being done in a way to meet required performance standards and avoid anaerobic composting conditions, thereby minimizing unfavorable odors.

DEQ rules do not identify the type of composting required to meet the regulatory performance standards and minimize odors. There are many different composting methods used around the state and one method is not necessarily better than another. A compost facility may use static piles, aerated windrows, anaerobic digestion or other composting techniques as long as the composting operation meets performance standards and minimizes odors. If DEQ determines a facility's methods are not meeting performance standards and minimizing odors then DEQ will require the facility to implement necessary changes.

A minimum 72-inch oxygen monitoring probe is being required because that is the longest commercially available push probe. Oxygen conditions 72 inches from the surface of an undisturbed static pile will be similar to conditions in the center of the pile (independent of pile size). If it is determined that a pile cannot be representatively monitored with the probe then the pile size will have to be modified such that representative monitoring can be conducted, or an alternate monitoring method will have to be implemented. The odor minimization plan, required to be included in the facility operations plan must demonstrate how the facility will avoid anaerobic conditions (in the center of the pile, as well as 72 inches from the pile surface).

Operations Plan Review and Implementation

Comment: DEQ received multiple comments concerning the permit requirement to submit an updated operations plan (including an odor minimization plan) for review and approval within 60 days of permit issuance, as opposed to prior to permit issuance. It was also suggested that the operations plan be subject to public comment. It was asked how long Grimm's will have to comply with the approved operations plan, and how compliance with the operations plan (including odor minimization plan) will be assessed and enforced. (*Ouellette, July 27, 2015; Giunta, July 8, 2015; Saedi, July 30, 2015; Rad, July 27, 2015; Federspiel, July 31, 2015; Darby, July 31, 2015; Colin Green, July 31, 2015*)

DEQ Response: Grimm's currently operates under an expired permit and associated operations plan. The new permit has additional requirements that the previous permit did not have, including performance standards, mandatory odor minimization plan elements and process control monitoring. The new permit will ensure that Grimm's is evaluated for compliance against DEQ's current compost rules. The permit requires Grimm's to update the operations plan to demonstrate how compliance with new permit and with current rules will be achieved. The current operations plan does not reflect the latest rules and permit elements. Upon issuance of the permit, the operations plan will need updating, and Grimm's will have 60 days to complete the necessary updates (per permit Section 4.3). The Operations Plan and Odor Minimization Plan are enforceable immediately upon approval.

The Operations Plan is available upon request and the public can always submit comments for DEQ consideration concerning any facility permit or operations plan.

Odor

Comment: DEQ received multiple comments that off-site odors from Grimm's composting operations can be very strong, noxious, offensive, and unhealthy. Some comments questioned why Grimm's would be issued a new permit when they currently appear to be out of compliance with odor minimization standards. Several comments addressed the odor of a particular material Grimm's handles: "mushroom compost." A third-party evaluation of odors was requested. The DEQ assessment that Grimm's has the "potential" to generate off-site odors was also questioned. Specifically, it was asked that the word "potential" be removed in all occurrences so as to recognize that Grimm's operations do in fact result in off-site odors. (*Williams, July 27, 2015; Rogers, July 21, 2015; Callahan, July 28, 2015; Robb, July 27, 2015; Pennock, July 27, 2015; Ouellette, July 27, 2015; Saedi, July 27, 2015; 23 residents of Pony Ridge, July 8, 2015; Bixby, June 02, 2015; Virginia Green, July 26, 2015; joakman259@aol.com, July 30, 2015; McGuire, June 22, 2015; Stephenson, July 29, 2015; Glover, July 24, 2015; Mahvash Saedi, July 31, 2015; Darby, July 31, 2015; Muller, July 30, 2015; Colin Green, July 31, 2015; Holland, July 31, 2015; Gonzales, July 8, 2015*)

DEQ Response: All composting facilities have some odors associated with them and are therefore assessed as having the potential to generate off-site odors. Grimm's has been operating under an outdated permit that does not reflect new performance standards. The permit being issued requires Grimm's to achieve these new performance standards and implement best management practices (through an operations plan and odor minimization plan) that will minimize offsite odors. DEQ intends to issue the new permit to ensure that Grimm's is accountable to current performance standards. DEQ will regularly inspect and evaluate Grimm's composting operations to determine compliance with all composting requirements. As necessary, DEQ will require facility improvements to address documented operational concerns and compliance issues.

DEQ does not solicit third-party odor evaluations but rather has an objective odor assessment process outlined in the DEQ Nuisance Odor Report, available online here: <http://www.oregon.gov/deq/docs/NuisanceOdorReport.pdf> (see also "Complaint Process and Response" section below).

Complaint Process and Response

Comment: DEQ received a comment concerning where and how to complain about Grimm's operations and how complaints are followed up on. (*Saedi, July 27, 2015*)

DEQ Response: Permit Section 9.15 and OAR 340-096-0150 require that Grimm's take the following actions when complaints are received directly by Grimm's: 1) Contact the complainant within 24 hours to discuss the problem, 2) Keep a record of the complaint details, 3) Immediately initiate a process to resolve the complaint, 4) When five complaints concerning an odor, litter or dust issue are received from five different individuals or businesses, report to DEQ immediately. Grimm's is required to keep a complaint log that DEQ will review during inspections.

Complaints can also be filed directly with DEQ through the DEQ Complaints Intake System (which are then also forwarded to Grimm's). Odor complaints received by DEQ are investigated

to verify odor sources. DEQ will contact the complainant to conduct a phone interview and/or request submission of an Odor Intake Form in order to obtain detailed information about the odor incident. DEQ will first seek to resolve odor issues through cooperative, voluntary, remedies, prior to moving to an enforcement strategy.

DEQ also has a Nuisance Odor Strategy whereby facility odor issues are systematically evaluated and addressed. A nuisance odor investigation is triggered when ten complaints about the same likely odor source, from ten different individuals (with separate addresses), are received within a 60 day period. During the investigation DEQ evaluates odor frequency, duration, intensity, and offensiveness. If odor impacts are concluded to be significant then an enforceable Best Work Practices Agreement is negotiated with the facility. Complainants are asked to comment on the agreement prior to its implementation.

More information on how to submit a complaint to DEQ can be found at this link:
www.deq.state.or.us/complaints

More information on the DEQ Nuisance Odor Strategy can be found at the following links:
www.deq.state.or.us/programs/enforcement/docs/complaints/NOSfs.pdf

www.oregon.gov/deq/docs/NuisanceOdorReport.pdf

Dust

Comment: DEQ received multiple comments concerning lack of controls for dust caused by facility operations as well as concern that the dust may contain pathogens. Some comments questioned why Grimm's would be issued a new permit when they appear to currently be out of compliance. (*Davis, July 24, 2015; Pennock, July 27, 2015; Saedi, July 27, 2015; Virginia Green, July 6, 2015; Federspiel, July 31, 2015; Darby, July 31, 2015; Hamilton, July 31, 2015*)

DEQ Response: There are several processing areas at Grimm's where dust may be created such as grinding, compost turning, screening, and transferring of material to the curing pile. Dust can be a public health issue if not properly controlled.

The new permit includes updated requirements that Grimm's comply with DEQ regulations regarding dust control and requires that Grimm's update the operation plan to include dust control best management practices that are protective of public health. DEQ regulations for composting facilities require implementation of effective methods to prevent dust from operations escaping the property, including preventing dust from facility roads becoming airborne. Facilities are not allowed to emit visible particulate matter (larger than 250 microns in size) at sufficient duration or quantity to create an observable deposition upon the real property of another person. Facilities are required to take reasonable precautions to prevent dust from becoming airborne through operational and best management practices such as applying water while conducting operations like turning piles or grinding feedstock, cleaning trucks before they leave the facility, and sweeping roads.

DEQ does not require monitoring equipment to verify compliance with dust control regulations but does conduct regular visual inspections and also responds to complaints. Corrective action will be required if dust is observed leaving the site.

Pathogen Risks & Other Biological Contaminants

Comment: DEQ received multiple comments concerning pathogen risks to surrounding residents, particularly vulnerable populations such as children and the elderly. Concern was raised that pathogens attached to dust particles could travel off-site to nearby residential areas and that pathogen inactivation might not be verified in finished compost products at all, or frequently enough. The potential for Grimm's composting operation to harbor rodents that could carry pathogens was also mentioned. One comment questioned why fungus, mold and spores are not tested for. It was stated that pathogen testing results should be made available to the public. Two comments stated that fungus content in Grimm's finished compost is damaging their landscaping plants. One comment noted that mushroom spores are being spread to landscapes by finished compost. (*Sherman, July 28, 2015; Williams, July 27, 2015; Callahan, July 28, 2015; Robb, July 27, 2015; Darby, July 31, 2015; Hamilton, July 31, 2015; Tunstall, July 8, 2015*)

DEQ Response: DEQ rules, and the permit being issued, require a double-barrier approach to demonstrating pathogen inactivation: 1) Routine lab analysis of finished compost products (for fecal coliform and/or salmonella), 2) Continuous achievement of temperatures adequate to inactivate pathogens of concern in active composting. Sampling for other pathogens and organisms in addition to fecal coliform and/or salmonella is not required in rule. Additional pathogen sampling is also not required by the United States Composting Council Seal of Testing Assurance Program¹ for certification of compost products.

Performance standards in rule and in the permit require that Grimm's take action to prevent attraction, harborage and propagation of vectors (rats, birds, flies, etc.) that could transmit pathogens.

Results of required pathogen tests are public record that anyone can request. For information about the public records request process please see the following DEQ webpage:
www.deq.state.or.us/records/recordsRequestFAQ.htm

Fire Risks

Comment: DEQ received a comment concerning combustion of compost piles occurring at the Grimm's facility in the past and questioning what steps are being taken to prevent future fires. (*Muller, July 30, 2015*)

DEQ Response: The permit addresses fires in Permit Section 9.11. "**Fire protection.** Arrangements must be made with the local fire control agency to immediately acquire their services when needed and adequate on-site fire control protection, as determined through the local fire control agency, must be provided. Fires must be immediately extinguished and reported to DEQ within 24 hours."

¹ <http://compostingcouncil.org/seal-of-testing-assurance/>

Methane Production

Comment: DEQ received multiple comments concerning methane production from composting, particularly under anaerobic conditions. One comment expressed concern about the potency of methane as a greenhouse gas. Comments questioned why methane controls aren't put in place. (*Darby, July 31, 2015; Muller, July 30, 2015*)

DEQ Response: DEQ does not regulate methane emissions from composting facilities.

Water Quality

Comment: DEQ received multiple comments concerning Grimm's potential impact on groundwater and surface water quality. (*Ouellette, July 27, 2015; Guinta, July 25, 2015; Bixby, June 2, 2015*)

DEQ Response: Grimm's operates under a National Pollutant Discharge Elimination System (NPDES) 1200-Z Stormwater Discharge Permit requiring water samples be collected quarterly in order to verify that Grimm's operations are protective of surface water and groundwater. Samples are analyzed for general parameters such as oil and grease, pH, and sector specific parameters such as phosphorus and nitrogen. Clean Water Services acts as DEQ's agent in administering this water quality permit. Clean Water Services can be contacted at 503-681-3600.

Permit Denial

Comment: DEQ received multiple comments requesting that Grimm's application for a compost permit renewal be denied outright, or that a permit not be issued until certain conditions are met. (*Bixby, June 2, 2015; McGuire, June 22, 2015; Stephenson, July 29, 2015; Glover, July 24, 2015; Wallace, July 31, 2015*)

DEQ Response: Grimm's received land use approval from the City of Tualatin Planning Department for operation at the current location. DEQ has reviewed Grimm's compost permit application and the operations plan submitted with the application. DEQ has determined that Grimm's has the capability to comply with regulatory requirements. DEQ has included several permit conditions to address the concerns that have been raised by neighbors and other individuals during the public comment period including prohibiting acceptance of dead animals (Permit Section 2.2), requiring an updated operations plan (Permit Section 4.3) and an updated odor minimization plan (Permit Sections 4.5, 4.6 and 4.7) and a demonstration project for residential food waste feedstocks demonstrating performance standards (including odor minimization and water quality protection) be met (Permit Sections 1.3 and 1.4). DEQ will proceed with issuing the new permit that references new rules and regulations and includes performance standards and considers issuance of the new permit essential to ensuring Grimm's complies with Oregon's composting regulations. After permit issuance, DEQ will undertake efforts to verify that Grimm's is in compliance. If DEQ identifies violations, appropriate action will be taken to make sure Grimm's returns to compliance.

Permit Issuance and Facility Appeal

Comment: DEQ received a comment concerning the process by which a permit can be issued despite potential ongoing appeals by the permittee. (*Colin Green, July 31, 2015*)

DEQ Response: DEQ is issuing this Solid Waste Individual Compost Permit to Grimm's. DEQ withdrew the previously proposed permit (issued on May 1, 2014) based on Grimm's May 16, 2014 appeal in order to clarify and enhance the permit language. If Grimm's chooses to appeal the issued permit, DEQ will follow its administrative appeal process.

Permit Term

Comment: DEQ received multiple comments suggesting that the proposed 10 year permit term is too long and that the term should instead be five years. (*Federspiel, July 31, 2015; Hamilton, July 31, 2015; Cesnalis, July 31, 2015*)

DEQ Response: Oregon Revised Statute (ORS) 459.245 authorizes DEQ to issue composting permits for a period up to ten years. DEQ intends to issue this permit for the maximum ten year time period. DEQ may initiate modifications to a permit at any time to include new regulatory changes or other conditions as appropriate. DEQ has modified the permit to require an updated operations plan and an updated odor minimization plan, as well as a demonstration project for acceptance of residential food waste feedstocks to make sure that if Grimm's accepts residential food waste, the facility can do so in a way that demonstrates compliance with performance standards. DEQ has also specifically identified in the permit the performance standards that compost facilities need to meet by rule.

Citizen Permit Appeal

Comment: DEQ received a comment enquiring about a process for citizen appeal of the permit. (*Virginia Green, July 26, 2015*)

DEQ Response: DEQ rules do not provide a process for citizens to file an appeal of a DEQ permit. Citizens may choose to challenge a DEQ permit in state court.

Routine Compliance Inspections

Comment: DEQ received a comment inquiring about routine determination of compliance with the facility operations plan. Another comment asked what instigates a facility inspection and whether the public can accompany DEQ during inspection (*Darby, July 31, 2015; Saedi, July 30, 2015*)

DEQ Response: Oregon Administrative Rule authorizes DEQ to conduct regular inspections of Grimm's to determine compliance with the solid waste permit and associated operations plan and odor minimization plan as well as DEQ rules. DEQ has no authority to allow a citizen to accompany a DEQ inspector on an inspection.

Inspections occur at a frequency deemed necessary by DEQ to assure facility compliance. Initially after permit issuance inspections occur as frequently as quarterly. Inspections are also

sometimes conducted as a result of complaints. All inspection reports are public record available upon request. For information about the public records request process please see the following DEQ webpage: www.deq.state.or.us/records/recordsRequestFAQ.htm

Miscellaneous (not otherwise categorized)

Comment: *“Condition 1.3B.v.- There should be a prohibition in the permit to compost with anaerobic conditions. Without more specific prohibitions the permit may be unenforceable. Are conditions in an operations plan enforceable with penalties? Why are the conditions that protect the public not stated in the permit itself, such as standards for oxygen levels, porosity, odor, etc.” (Darby, July 31, 2015)*

DEQ Response: Permit Section 4.5 C. requires procedures to avoid anaerobic conditions be addressed in the Odor Minimization Plan, which is enforceable as an extension of the permit. DEQ follows its enforcement guidance to determine if violations are referred for penalties. Acceptable process parameter ranges are not defined in the permit because ideal ranges are dynamic based on multiple operational conditions and other factors. DEQ considers the Operations Plan and Odor Minimization Plan better suited than the permit to address target parameter ranges. DEQ will require these plans to include those parameters.

Comment: *“Condition 1.4- Citizens should be involved in the Food Waste Demonstration Project if and when it happens. There should be involvement from the residents with regard to an odor study during the demonstration project. If Grimm's does not trust citizen involvement, then a third party odor study should be conducted with an odor panel at specific identified odor events. Citizen comment should be allowed on the Demonstration Project evaluation report. Citizens should be notified prior to the commencement of a Demonstration Project.”*

“Condition 1.5- Other feedstocks should be prohibited without a permit modification or the conducting of an additional Demonstration Project, during which the public should be notified that one is being conducted.” (Darby, July 31, 2015)

DEQ Response: If Grimm's proceeds with a food waste demonstration project, all documents submitted to DEQ for review are public record and can be requested. DEQ may receive comments from the public at any time, not just when permits are being issued, modified, or renewed. Any change in feedstock acceptance will require a permit modification, which will include public notification and opportunity to comment when appropriate.

Comment: *“Condition 2.3- The facility should not be allowed to store hazardous waste for 90 days. There is no reason it cannot be dealt with and removed within 48 hours just like putrescible wastes. Hazardous waste presents a much greater threat to the watershed than putrescible wastes.” (Darby, July 31, 2015)*

DEQ Response: Permit Section 2.3 states: *“In the event the permittee discovers wastes that are hazardous or suspected to be hazardous, the permittee must, within 48 hours of discovery, notify DEQ. Hazardous wastes must be removed within 90 days of discovery, unless otherwise approved or restricted in writing by DEQ. Temporary storage and transportation must be carried out in accordance with DEQ rules.”*

In the event hazardous wastes are inadvertently accepted DEQ will evaluate the best management plan for those wastes. It may not be feasible to properly remove the waste within 48 hours. Removal within 90 days is consistent with the longest amount of time that a regulated hazardous waste generator is allowed to store hazardous waste on site. Permit Section 2.3 gives DEQ the authority to reduce the 90-day time period as appropriate for the particular situation. Permit Section 2.3 also requires that temporary storage of hazardous waste be done in compliance with applicable DEQ rules, which are intended to ensure environmental impacts are mitigated.

Comment: *“Condition 4.4- There are no procedures specified to get representative samples. The procedures should be in the permit where they will be repeated consistently and be enforceable.” (Darby, July 31, 2015)*

DEQ Response: Procedures for representative monitoring of process parameters will be addressed in the facility operations plan, which is enforceable per Permit Section 4.2.

Comment: *“Condition 4.4- Not all parameters are included here. Also this monitoring is meaningless because the facility has no standards to meet. Why are there no standards for oxygen levels? Doesn't the science support conditions necessary for aerobic activity in composting?” (Darby, July 31, 2015)*

DEQ Response: There is general industry guidance on ideal ranges for process parameters. Process parameter monitoring is required as a proxy for achievement of performance standards. DEQ is generally not prescriptive of specific parameters to be monitored (outside of the fundamental parameters required to be monitored in Permit Section 4.4), or parameter ranges, but rather focuses on ensuring that performance standards are achieved. Process parameter values correlated with achievement of performance standards is one way that DEQ will assess ongoing achievement of the performance standards.

Comment: *“Condition 4.5- How will Type 3 feedstocks be received? How will the liquids associated with this type of feedstock be addressed to minimize odor, such as milk? This should be specified in the permit. Will trucks be unloaded over a containment pit with a drain? Other states report that liquids from putrescible materials are one of the more messy aspects of Type 3 feedstocks. There should be more conditions in the permit itself to deal with these materials.” (Darby, July 31, 2015)*

DEQ Response: Procedures for feedstock receipt including leachate management and odor minimization will be addressed in the facility operations plan, which is enforceable per Permit Section 4.2.

Comment: *“Condition 9.14- All trucks hauling putrescible waste should be leak tight so malodorous material (such as liquid) is not left on streets as they approach the facility.” (Darby, July 31, 2015)*

DEQ Response: Reference Permit Section 9.2. **“Vehicles.** *All composting vehicles and devices operated by the permittee, and using public roads, must be constructed, maintained, and*

operated so as to prevent leaking, shifting, or spilling of feedstocks and finished compost while in transit.”

DEQ does not regulate non-permittee owned trucks.

Comment: *“Condition 8.1 Mid-term review- some of the things on this list, such as changes in operation of the facility should be dealt with when needed. The mid-term is at 5 years. If the facility has operated without updating its Operations plan and it isn't discovered until the mid-term, that should be cause for enforcement.” (Darby, July 31, 2015)*

DEQ Response: Reference Permit Section 4.8. **“Plan maintenance.** *The permittee must revise the Operations Plan as necessary to keep it up to date and reflective of current facility conditions and procedures.*

The permittee must submit revisions of the Operations Plan to DEQ for review and written approval prior to commencing any change in operations.”

If DEQ discovers during routine inspection that operations have changed such that the operations plan no longer reflects facility conditions and procedures, DEQ will evaluate whether the change constitutes a violation and follow the appropriate enforcement guidance.

Comment: *“Under Odor Screening: ‘Grimm’s is an existing composting operation that uses a large pile composting method rather than windrows. This means that sections of Grimm’s composting pile are in various composting stages at any given time. New material added to the top of the pile causes less volatile organic compounds to be released into the atmosphere compared to open windrow’ My question is; Is there any scientific evidence for this statement/theory? Common sense tells us that any dense material (due to excess weight of higher pile) decreases air volume in pile, causes less oxygen for aerobic process, especially at the middle and bottom of pile.” (Saedi, July 30, 2015)*

DEQ Response: DEQ has reviewed this statement in the Permit Evaluation Report. The report has been modified to provide clarification as follows:

“Grimm’s is an existing composting operation that uses a large pile composting method rather than windrows. This means that sections of Grimm’s composting pile are in various composting stages at any given time. New material is routinely added to the top of the existing pile and left in place. Unlike windrow composting, which involves frequent pile turning, Grimm’s turns compost material relatively infrequently. Grimm’s monitors wind direction in an effort to conduct pile turning at times when odor impacts to surrounding residential neighbors will be at a minimum. Wind direction and wind speed are constantly monitored at the facility.”

Comment: *“Under 8.1 Mid-term review add a bullet point to this section to read: (X) number of complaints from neighboring communities, businesses and other concern individuals and organizations. This also should trigger a mid-term review. Is this a reasonable and logical request?” (Saedi, July 30, 2015)*

DEQ Response: The mid-term permit review is defined by the permit as a fixed review period. Complaints as well as DEQ observations during routine inspections also trigger review of the permit. Note Permit Section 8.3 allows DEQ to modify, suspend or revoke the permit at any time for reasons such as the following: violation of any terms or conditions of the permit or any applicable statute, rule, standard or order of the Environmental Quality Commission; obtaining the permit by misrepresentation or failure to disclose fully all relevant facts; a significant change in the quantity or character of feedstocks received; non-compliant operation of the composting site; or a significant change in the composting process. Also note the DEQ Nuisance Odor Strategy, as described in "*Complaint Process and Response*" (above) triggers an odor investigation as a result of DEQ receiving 10 odor complaints (from 10 different individuals) in a 60-day period. The odor investigation would subsequently result in permit modifications as necessary.

Comment: "*Under 8.5 Public participation. 'Significant changes to the permit will be made public by the issuance of a public notice as required by DEQ rules'. My question is, is the increasing in production volume, changing the method of operations, expanding land use, etc. considered to be significant?'*" (Saedi, July 30, 2015)

DEQ Response: An increase in production volume, changing the composting method, and changing land use all have the potential to result in permit modifications that would involve a public comment process, depending on how substantial DEQ evaluates the changes to be.

Comment: "*Mushroom Compost-Does DEQ have any rule(s) on mushroom composting? if not, DEQ needs to consider a ruling especially in an urban area.*" (Saedi, July 30, 2015)

DEQ Response: DEQ does not have rules specific to "mushroom compost." This material is subject to all other relevant regulation of feedstocks and odors and must be managed in a way that meets performance standards.

Comment: "*DEQ Solid Waste Division: Please provide DEQ's rationale and the scientific data which DEQ relied upon to determine that Grimm's is a "low risk" facility relative to financial assurance risk. Please explain that if DEQ has "inadequate" information relative to groundwater and surface water impacts, then what specific measures did DEQ use to determine Grimms is "not likely to result in significant amounts of residual water materials or contamination at the time of site closure."*(pages 4-5) **Please make public** all evaluative information DEQ used to determine Grimm's to be a "low-risk" facility for financial assurance, make public DEQs' evaluations based upon this evaluative data, and **include DEQ's reasoning** that Grimm's is a low-risk facility." (Guinta, July 25, 2015)

DEQ Response: OAR 340-096-0001 provides the authority for DEQ to require financial assurance for composting facilities and to exempt low-risk facilities from those requirements. For purposes of composting facility financial assurance risk screening, a low risk facility is one DEQ determines is not likely to result in significant amounts of residual waste materials or contamination at the time of site closure. DEQ makes this determination based on review of site-specific information in the permit application package and any additional information DEQ may request.

Based on evaluation of the information submitted, DEQ has determined that Grimm's composting facility is a low-risk facility for financial assurance and therefore is exempt from financial assurance requirements. This determination is based on the nature of the solid waste, minimal engineering maintenance level required at the site after site closure, and that the solid waste would not be deposited at the site permanently, but would be removed and used for other purposes. The low-risk checklist is part of the permit application review process and is a public record that may be requested.

Comments in Support of Grimm's

Comment: DEQ received multiple comments supporting the issuance of the composting permit for Grimm's and supporting the services and jobs that Grimm's provides. Some comments also suggested that many of the complaints against Grimm's seem exaggerated and inaccurate. One comment questioned why Grimm's should have to change its operations when the facility existed prior to nearby developments. (*Musselman, July 13, 2015; Gamache, July 14, 2015; Jergentz, July 28, 2015; Wheeler, July 10, 2015; Snyder, July 31, 2015*)

DEQ also received a petition containing 864 signatures from individuals who support renewal of Grimm's permit. (*Jeff Grimm, July 20, 2015*)

DEQ Response: Comments of support noted. DEQ is issuing this permit to ensure that Grimm's meets performance standards identified in rule. Regardless of whether Grimm's existed before nearby development, Grimm's must comply with DEQ compost requirements.

Permit Changes Made After DEQ Review of Comments

1. **Section 1.3 B. iv. previously read:** *"Monitoring compost piles for oxygen, temperature, C:N ratio, moisture content, free air space (porosity), bulk density and other necessary composting parameters;"*

Section 1.3 B. iv. now reads: *"Monitoring compost piles for oxygen, temperature, moisture content, and other necessary composting parameters;"*

Rationale: This section did not previously reconcile with Section 4.4. Monitoring requirements for C:N ratio, free air space (porosity), and bulk density have been removed because DEQ is not prescriptive of these parameters and currently has no regulatory need for collection of this data. [Related public comments: *Darby, July 31, 2015; Saedi, July 30, 2015*]

2. **Section 2.3 previously read:** *"Discovery of prohibited wastes. In the event that the permittee discovers prohibited feedstocks or wastes at the composting facility, the permittee must, within 48 hours of discovery, notify DEQ and initiate procedures to isolate or remove the prohibited feedstocks or waste."*

Section 2.3 B. now reads: *"Discovery of prohibited wastes. In the event that the permittee discovers prohibited feedstocks or wastes at the composting facility, the permittee must, within 24 hours of discovery, notify DEQ and initiate procedures to isolate or remove the prohibited feedstocks or waste."*

Rationale: Notification within 24 hours is consistent with other notification requirements in rule. [Related public comments: *Darby, July 31, 2015*]



Attachment B

PUBLIC HEARING MEMO

Memo

Date: November 20, 2015

Subject: Public hearing summary
July 8, 2015 Public Hearing on the draft DEQ solid waste
compost permit for Grimm's Fuel, permit #1433

DEQ held a public hearing on July 8, 2015 at the Juanita Pohl Center located at 8512 SW Tualatin Road in Tualatin, OR 97062.

Kieran O'Donnell served as the hearings officer. DEQ asked people who attended the hearing to sign the attendance sheet. DEQ asked people to sign comment cards if they wished to present formal verbal comments. DEQ informed attendees that the purpose of the hearing was to take formal verbal comments on the draft DEQ solid waste compost permit for Grimm's Fuel. DEQ also explained that DEQ would record the verbal comments received. DEQ informed attendees that when the comment period closed, DEQ would then review comments received, respond to comments, make any additional changes to the permit and proceed with issuing the permit.

Forty-seven people attended the hearing. Before taking formal comments, DEQ staff answered questions of the attendees. The hearing started at 7:28 pm. Eight people provided verbal comments. The transcription of the comments is attached. The hearing ended at 7:56 pm.



State of Oregon
Department of
Environmental
Quality

**Northwest Region
Environmental
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Contact: Bonnie Wakefield
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DEQNWR.SolidWastePermitC
oordinator@deq.state.or.us

www.oregon.gov/DEQ



Attachment C

TRANSCRIPT

Comments: Proposed DEQ Solid Waste Composting permit for Grimm's Fuel Company
Wednesday, July 8th, 2015
(transcribed by Sharon Chalem)

Kieran O'Donnell: Ok, I will now call the hearing to order. Today is Wednesday, July 8th, 2015, and the current time is 7:28 pm. My name is Kieran O'Donnell, and I'll be the presiding officer for this hearing. The purpose of this hearing is to take comment on the proposed DEQ Solid Waste Composting permit for the Grimm's Fuel Company composting facility. I will call people one by one to come up and comment. This meeting is being audio-recorded, and by signing up to provide verbal comments, you are consenting to be recorded. DEQ will consider your comments, and any suggested comments you make to the extent that DEQ rules and laws allow. Please be aware you may raise issues that are outside of DEQ's scope of authority. Following the close of the public comment period, DEQ will prepare a response to comments. The document will be available via online posting, and an email will be sent to people who commented. So please come to the table when you are called. State your name and speak into the microphone so your comments will be recorded. You will have three minutes to provide verbal comments, and at three minutes, I will give you a reminder to conclude your comments. Please respect the rights of the individuals who are making formal comments, and do not interrupt them while they are speaking.

KO: OK, the first comment is for Brett Hamilton.

Brett Hamilton: Grimm's may own their land, but they do not own the air, especially the air in my house. Our air is a shared resource. If Grimm's was belching out black smoke night and day, the scale of pollution would be obvious and undeniable. But Grimm's pollution is invisible and insidious. If you could see the plume of volatiles(?) or organic compounds wafting from their composting piles, you could record it on video; but unfortunately there is no way to record a smell. I live more than a mile away from Grimm's compost piles, and the stink is strong and totally unpleasant. Grimm's should not be permitted to spill noxious compounds into my bedroom and my lungs. This kind of air pollution is unacceptable. The off-gassing from their industrial composting operation should be filtered and scrubbed, like any other toxic industrial process. Grimm's is not managing the odor from their operation. When the waste byproduct of your business spills out beyond your property line and affects an area of three square miles, then you have a serious problem. My request is simple; I'm asking DEQ to require that Grimm's contain their pollution within their property, and if Grimm's can't do that, then perhaps they need a bigger piece of property or a much smaller pile of compost. Thank you.

KO: OK, next we have Ted Saedi.

Ted Saedi: I'm Ted Saedi, and I have a master's degree in engineering. I have worked as an engineering manager for over twenty years. I have lived in Pony Ridge for the past seventeen years. Pony Ridge and Angel Haven are the two nearest communities to Grimm's facility, with almost 260 houses in total. Pony Ridge is located on the opposite side of the street from Grimm's Fuel Company. In the new proposal, I believe that DEQ is not being impartial and is favoring Grimm's Fuel Company. DEQ is not considering the livability of Grimm's neighboring population. It is somehow obvious that DEQ has been influenced by some big shots or agencies to issue this draft.

One: Shortly after the new permit of last May, and following the appeal of Grimm's, DEQ quietly withdrew the permit without notifying the public, and kept it quiet for another year. I believe this is unethical.

Two: Provision for Type 3 feedstock was conveniently removed from the new public notice flyers. This was misleading. It has given people a false impression that the Type 3 feedstock has been entirely eliminated from the proposal.

Three: DEQ is praising Grimm's for doing everything right, and that Grimm's is being very cautious of wind direction. For DEQ, quote, unquote, "Wind directions and wind speed are constantly monitored at facility." If so, and if effective, I don't know why we're impacted by so much odor and brownish dust.

Four: DEQ is repeating that there has been only a couple of complaints in the past two decades, but conveniently ignoring to acknowledge over one hundred complaints by nearby residents in past couple of years. The fact is that the reason for low complaints in past was that Grimm's odor was not as nasty and as often as now. People also didn't know where and who to complain.

Five: DEQ is referring to 453 people who signed a petition asking DEQ to renew Grimm's permit of operation. Of course I would sign it, too, but under what permit condition? Petition had a misleading statement, which was signed by people from Portland, Beaverton, Tigard, Aloha, Lake Oswego, and Tualatin, and none from nearby residents. I wonder how many people would have signed it if the question was to ask -- or to say -- "Would you like to live in a malodorous neighborhood, adjacent to a composting facility who uses an outdated method of composting?"

KO: It's three minutes, please.

Ted S: OK.

Six: DEQ is implying that the pile-high method of composting is a preferred method of composting for our community. Is there any scientific proof? DEQ is getting Grimm's permit first, and then asking Grimm's to come up with an odor mitigation plan later. Shouldn't it be the other way around? DEQ has repeatedly uses possible odor impact to facility neighbors. Is there any doubt that Grimm's composting operating generates odor, and is impacting nearby communities and neighborhood business? This odor mitigation requires an investment, a major change in infrastructure in the mechanics of the facility. It also needs to alter method of composting from pile-high to an acceptable method that prevents anaerobic condition. What is not acceptable as an odor mitigation plan is watching for wind directions and speed moisture, etcetera, as they are not controllable, and not always predictable. This is not a reliable plan.

KO: I'm going to have to cut you off there. We're at four minutes and thirty seconds.

Ted S: Just 30 more seconds. What is not acceptable as an odor mitigation plan is to let the neighbors know the compost pile turning days. This means, hey neighbors, this thing is coming out your way; you like it or not? Odor emission especially on compost turning days are so strong and noxious, that even with closed windows, odor remains inside our home, and it stinks our clothing.

KO: OK thank you, sir, we can take this and submit that as well, the written comments. Alright, the next commenter is Virginia Green.

Virginia Green: I just have written ... (fades out)

KO: Oh I see that now, thank you. OK, and I apologize, Jan Giunta

Jan Giunta: My concern about Grimm's and the DEQ proposed permit is that in 2013, the permit -- we knew-- we had an operations plan, and we had an odor minimization plan. Now we have neither. I have no confidence that DEQ will monitor and require Grimm's that which is necessary to protect our health and well being in our community. They're understaffed, their budgets have been cut. It'll be lucky if they can get out once a year -- one person can get out once a year. I would certainly encourage DEQ to require the odor minimization plan, and also the operations plan before this permit is issued. This is the only public input process allowed. Once this permit is issued, if an inadequate plan -- two plans come forward, we have no say in it, we cannot change it. Last time, we could. We had a lot of input into that. Remember last time on his operations plan, and his odor minimization plan for the aeration, he was going -- and did use, and I'm not sure if he still does -- his Caterpillar D9 was the only aeration system that he proposed to use. I'm wondering, DEQ, once the permit is issued, and in his operations and odor minimization plan, if the only aeration system is this Caterpillar D9? We know that is totally insufficient with a pile when it's 60 feet tall. So I'm hoping -- *I'm hoping* that DEQ has the courage to monitor this facility and to move the facility. I understand it's a process to move this

facility to the modern age. Nature's Needs, when they reapplied for their permit just months ago, had one comment. Before, they had hundreds. And the reason is because they modernize, they change their processes. I'm asking Jeff Grimm tonight to put the money into his facility to modernize his facility so that he becomes a good neighbor for us, but he also becomes a good business partner for Metro, and for DEQ. Composting is an important aspect of our -- of our recycling effort, so I wanna see Jeff Grimm continue, but only under modern business practices. Thank you.

KO: OK, Rocky Bixby.

Rocky Bixby: Good evening. I didn't write this as good, to me, to read to tonight, so this is on behalf of Pony Ridge. We the residents of Pony Ridge are one of the two of the residential communities nearest Grimm's fuel company facility, 350 yards per Google Map. Pony Ridge has 141 homes with many families living with children and elderly, and also Angel Haven, an over-55 community with about 120 residences. All we want is to live in an odor-free, pollution-free neighborhood. Based on the State of Oregon DEQ compost guidelines regulations, Grimm's Fuel Company should keep composting odors within the company's property boundaries. We ask that DEQ enforce its own regulations to Grimm's facility. Our goal is not to ask Grimm to cease its operations or to move, but simply to invest in its business and modernize in composting procedures as Nature's Needs did in North Plains, with a positive result. Said procedures include the use of windrows, bio-filter systems, and lime leachate holding areas, etcetera. We ask Grimm's to have a respect for its neighbors by mitigating the odor and keeping the odor within its boundaries. We continue to oppose the pile-high method, as it is proven impractical. This method does not sufficiently prevent anaerobic conditions and pathogens, nor adequately control dust and vectors, let alone keep odors and dust within the facility boundaries.

Without a basic change, we believe Grimm's will continue to be out of compliance with DEQ odor regulations, regardless of the terms of this proposed new permit. Problems with the current and past state of Grimm's operation: Too many times, the odor becomes so overwhelming that those of us living closer to the compost piles are forced to close our windows. The strong odor fills up the houses completely. It restricts from outdoor activity. Some of us have COPD, and it's hard to breathe during those times. Not only the awful odor degraded our quality of life, but has a negative impact on our property values. Mushroom composting must be eliminated from Grimm's products, as mushroom compost stench is extremely nauseating, especially during compost loading stages. And for those of you who don't live around here, I'm assuming if I asked you to move into a place where the stench is so bad, you couldn't really go home, I don't think many of you would raise your hands and want to live there. The problems with the DEQ's new proposed draft permit, in the draft: Grimm's is allowed, with conditions, to receive and process curbside food waste, which includes meat and

dairy products. If this happens, the present problem of dust and too-frequent odor releases caused by the use of Grimm's outdated practices of pile-high, will exacerbate the current situation. In this draft, Grimm's is allowed to once again increase the compost pile to extreme and unmanageable heights and diameter. This is one step backwards. Mushroom composting should not be allowed. That's all I have, sir.

KO: Thank you. OK, next we have Barbara Oulette?

Barbara Ouellette: I live at Angel Haven, a manufactured home community, a 55-plus community. We have a lot of elderly, not well people that live there. Some people are more well, but just the nature of our ages puts us in a precarious position. I have some questions, comments. The first one is to the DEQ. Um, why were not the people in Angel Haven sent notices of this tonight? I mean, we were not sent this. I found this out because a neighbor here told me about it yesterday. We've got 120-some resident homes, and we did not know about it. Aren't we required? I mean, isn't it required that the neighbors be notified of meetings such as this? How would we find out otherwise, by osmosis? I mean, this was very upsetting to me. We each have an address. The park has an address, but each one of us have an address, and we should be respected in that. We've been there almost as long as Grimm's; well, actually longer than Grimm's, the park itself. I've been there almost as long Grimm's.

Anyway I want to know, what are the real risks to surface water and ground water at the facility? The word is *real* risks. And I am opposed to the height of the piles. That is a huge problem, and has been for the 27 years I've lived there. And again, I agree with the others that have said that a 60-day -- that the permit being issued, and then the plan put in -- is cart before the horse type situation. And in that document, there is a word, *endeavor* that says that DEQ *endeavors* to actually inspect yearly. Endeavor, to me, means maybe, maybe not. And once a year would be required under any circumstance. And how often does Grimm's have to submit storm water samples? Grimm's is too close to residential homes to be dealing with Type 3 food waste. What non-vegetative is processed at Grimm's at the present. Is there any possibility of Grimm's ever processing sewage sludge? This is not acceptable when you consider the proximity to homes and businesses. Um, balking agents, additives and odor control agents; are these chemicals, and are they potentially dangerous to human beings?

KO: It's three minutes. Thank you.

Barbara O: It's all yours.

KO: Emily Gonzales.

Emily Gonzales: Um, my comments were originally going to be a little bit different, but I felt the need to write some new ones as I sat there in the back. The three people in front of me wearing

the Grimm's shirts have been snickering, laughing, and shaking their heads while people asked questions of DEQ and made their formal comments. I can't help but wonder if this attitude represents the attitude of Grimm's as a whole. They can smirk all they want, but they aren't the ones waking up at 2:00 a.m. gagging, because they made the mistake of leaving their bathroom window open. They haven't held their four year old's hair back as she vomits from the smell in your front yard. They haven't had to tell their children, "I'm sorry you guys can't go out and play today because the smell is so bad." I make complaints anonymously, and I do that because the first time I made the complaint through the DEQ system, not anonymously, the only response I got from Jeff Grimm was simply a map of the wind directions for the complaints I had made. No comments, no nothing, as if to imply that the wind wasn't blowing that way, so I couldn't have possibly have been smelling anything. It doesn't matter if it's windy, it doesn't matter if it's not, it doesn't matter if it's morning, noon, or night -- I feel like I'm a Dr. Suess book at this point -- it doesn't matter if the windows are open or they are closed, it doesn't matter if it's June or December. There is no rhyme or reason to the smell that comes off Grimm's.

I am not opposed to Grimm's operating. I believe that composting is an incredibly important and valuable resource. I just feel like there's a major lack of consideration for the residents who live by Grimm's. I feel like people make it seem like we're imagining the odor, like we're in *Alice in Wonderland*, and the odor isn't really there, but I see the nodding heads and will tell you that it's there. I feel like there's not enough oversight from DEQ. I feel like a lot of the answers we are getting are just canned answers. They keep talking about proper composting, yet they admit that the probe that would be used to ensure proper composting is insufficient.

So it just feels like there is no oversight beyond willingness for DEQ to answer our questions concerning, is there a hazard to our health to live there, saying that that's not the parameter. What, exactly, is DEQ's job? Is it Department of Environmental Quality? If not them, then who? If not them, then who makes sure that the residents are not being ill? Do we have to call Erin Brokovich on the City of Tualatin? Or is this city going to look out for us? [clapping and cheering from audience]. Because if it's not safe, then why did this city allow the houses to be built? And Grimm's came first, and Grimm's has the right to operate a business, which they do. Why approve houses? Why not offer that land to Grimm's so that they could expand their operation? Why would -- Tualatin allowed these houses to be built. The County allowed these houses to be built. The County has the responsibility to the residents to ensure just general well-living situations. I mean, again, I - I understand the occasional smell; that's cool. Alright. But it should not be so bad that my kids vomit on my front yard. That's too bad.

KO: Okay, Chad Darby?

Chad Darby: Well, this is a continuation of a comment – or a question I had earlier. So it states in the composting facility permit evaluation that, um, since September 2009, with newly

adapted compost rules, that facilities have to submit information to DEQ for an environmental and human health risk assessment. It's on page three of the Permit Evaluation Report. It says that high risk facilities are also required to operate under an individual compost permit. So I take it that this is a high risk facility. DEQ's staff evaluated Grimm's fuel company compost operations for potential environmental and human health risks. So I would like to see that human health risk assessment report. And if it's done properly, it should include all exposure pathways, including ingestion and inhalation. And if it is done properly, then the gentleman who wanted to know about risk will actually have some numbers, because there will be an excess cancer risk number in there, and there will also be some numbers having to do with human health hazards, both acute and chronic. And unfortunately, you know, the city did allow construction to go in near the facility, and that's no fault of Grimm's. I actually love having Grimm's within a mile of my house. I use them all the time, and I think composting is an important part of recycling. But if the human health risk assessment is done, you should know that there's a senior center right nearby, which under air quality rules, we consider it a sensitive receptor because of compromised health, generally. So I'd like to see that.

I just had one comment under conditions in here. It has to do with monitoring and [shuffling papers]... I wish I had this flagged(?) better. It basically says that for pathogens, for Type 1 and Type 2 feedstocks, that testing should be done at a maximum of once every three months. I think that should say *minimum of once every three months*. So I'd like to see that corrected in the text. And I will point out that I don't think that's often enough. Um, although I do use Grimm's soil for a lot of purposes, I've stopped using it for landscaping. I moved in ten years ago, and re-landscaped my terra(?) front yard with soil that I brought in. Everywhere that I've brought in the new soil, my trees have died of verticillium wilt, which a nursery told me is due to fungus in the soil. And so I looked up whether I could sterilize the soil, and when I came across articles on composting, and the temperature requirements that you have in here for the 15 days are what are recommended to kill verticillium wilt. So if that was being done at Grimm's, my trees would still be alive. So something needs to change in the composting process to ensure that pathogens are adequately addressed. And I will submit the rest of my comments in writing. Thank you.

KO: So that was the last comment card that I had. And we're running up against the end, but I want to give Mr. Saedi a chance to finish his comments. The reason -- if you want -- the reason we have the time limit is to try and get everybody in with the amount of time. But if you'd like to come up and finish your comment, we can do that now.

Ted Saedi: OK

KO: And I've got your...

Ted Saedi: I was talking about the plans, what is not acceptable as the mitigation plan is because that was -- it was talking about let the neighbor know of compost pile turning days, so we let you know in advance. This means, *hey, neighbors, a stink is coming your way, whether you like it or not*. Odor emission, especially on compost turning days, are so strong and noxious that even with closed windows, odor remains inside of homes and stinks our clothing. Grimm's should stop mushroom composting, or whatever they're doing with the mushroom compost products, as the stench is unbearable. An attempt to keeping the unlimited pile high impact, DEQ is proposing a solution by using 72-inch monitoring probe. This deserves a scientific explanation as how a 72-inch monitoring probe can effectively work on a 60-foot high, a hundred feet wide compost pile. Seventy-two inch monitoring probe is meant to be used in a wind___(?) method of composting, and not on the pile high. This is not a practical solution, and DEQ knew it. How Grimm's is planning to aerate the center of active compost pile without changing its methodology and infrastructure of composting. For example, this is things that we wanted to know.

KO: Okay, thank you...Okay, the time is now 7:56, and I'm closing the hearing. Thank you for your comments.

End of transcript



Attachment D

ATTENDEES



Oregon Department of Environmental Quality Attendance Sheet



Event/Topic: Grimm's Solid Waste Permit Date: 7/8/15 Location: Suanita Pol Center
(Please print)

Name	Affiliation	EMail (for electronic notices)*	How did you hear about this meeting
Heather Martin	Employee	HEATHERMARTIN 05@LIVE.COM	DEQ NOTICE
Tyler Roach	Employee		DEQ NOTICE
Stelton Glidden	Employee		DEQ NOTICE
Steven Gibson	Employee		DEQ NOTICE
Francisco Chavez	Employee		DEQ NOTICE
William Washburn	Employee		DEQ NOTICE
Carol Vetter	Employee		DEQ
Steve Olafsen	Employee		DEQ NOTICE
Michael & Musselman	Employee		DEQ NOTICE

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Oregon Department of Environmental Quality Attendance Sheet



Event/Topic: Grimm's Solid Waste Permit Date: 7/8/15 Location: Stantia Pol Center

(Please print)

Name	Affiliation	EMail (for electronic notices)*	How did you hear about this meeting
Jeffrey Stobie	Pony Ridge Resident	drie1jst@yahoo.com	DEQ Notice
Dan Grimm	Grimm's Fuel		DEQ Notice
Brett Hamilton	TUMANN RESIDENT	brett@simplebe	DEQ NOTICE
Zach Co. USA	Tealation Resident	jon.givuhra@gmail.com	DEQ Notice
Mark Grimm	Employee	mark.grimm@scw.com	DEQ
Robert Sern-	Employer	Robert.Sern-	DEQ
Aletta Musselman	Grimm's Fuel	AlettaMusselman	
Mylva Nielsen	Grimm's Fuel	Maa53@td.com	DEQ
Heberto Gonzalez			

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Name	Affiliation	EMail (for electronic notices)*	How did you hear about this meeting
Simcan Rejos	Employee		
Dallas Brush	Employee		
Emily Gonzalez	Pony ridge resident		DEQ Notice
Librado Fedino	Employee		
Christine Tunstall	Resident	sam.tunstall@frontier.com	email notification



Oregon Department of Environmental Quality Attendance Sheet



Event/Topic: Grimm's Permit Date: 7/8/15 Location: Juanita Polk Center

(Please print)

Name	Affiliation	EMail (for electronic notices)*	How did you hear about this meeting
Barbara Ouellette	Live in Vicinity	become@qmail.com	Neighbor
Katana Morganston	Live at Angel Haven	none	"
Sean Grimm	Employee	Sean.T.Grimm@gmail.com	Grimm's DEQ Notice
Seth Hutchinson	Employee		Grimm's DEQ Notice

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Oregon Department of Environmental Quality Attendance Sheet



Event/Topic: _____ Date: _____ Location: _____

(Please print)

Name	Affiliation	EMail (for electronic notices)*	How did you hear about this meeting
Bill Metzler	Metro	metzlerbill Bill.Metzler@OregonWeb.com	DEQ notice
John Maker	Homeowner	makerj@comcast.net	DEQ mailing
Kieran O'Donnell	DEA	Kieran O'Donnell.k@oc-jog.state.or.us	N/A
Virginia Spear	Bony Ridge Resident	virg-spear@bonyridge.com	DEQ Notice
Mahvash Saedi	"	Mahvash.Saedi@hstmail.com	DEQ NOTICE
TEN SAEDI	BOUY RIDGE RESIDENT	ATA.SAEDI@HOTMAIL.COM	DEQ NOTICE
Scott Martin	Crimin's employee		DEA notice
Tonya Polue	Tonya Ruppel-Bandini	sanyrines@hstmail.com	DEQ Notice
Heppen Titus	Self	sntitus@qmail.com	DEQ Email

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Name	Affiliation	Email (for electronic notices)*	How did you hear about this meeting
Rocky Bixby Cheryl Bixby	Pony Ridge	rockybixby@hotmail.com	Residents @ pony ridge
VEDESARIO FLORES	EMPLOYEE		
Jordan Miller	Employee		DEA Notice
Joseph [unclear]	Employee		
Mackenzie Rowlands	Employee		DEA NOTICE
[unclear]			
Aracely Druik	Pony Ridge	already received estrella4x3@yahoo.com	Residents @ pony ridge
Chad Darby	Resident	emdarby@frontier.com	Online
Emma Gallardo	employee		
Esperanza Gallardo	Employee		



Attachment E

ALL COMMENTS RECEIVED



Comment Card

1

Name BRETT HAMILTON
Address 11430 SW KALISPELL ST
City TUALATIN Zip 97062
Email: BRETT@SIMPLE.BE

VERBAL



Comment Card

2

Name TED SAEDI I WANT TO SPEAK
Address _____
City TUALATIN Zip 97062
Email: ATA.SAEDI@HOTMAIL.COM

WE REQUEST THAT GRIMM'S CHANGE COMPOSTING METHOD TO
AN ACCEPTABLE MODERN METHOD WHICH DOES NOT GENERATE
ODOR & POLLUTION,
Air



Comment Card

3

Name Virginia Green
Address 18363 SW 135th Terrace
City Tualatin Zip 97062
Email: _____

Concerned about odor & dust from Green's Fuel.
" about Health affects on families & the effect
possible
on my property value in future. And the smells call be terrible
& strong.



Comment Card

4

Name Jan G. Guida
Address 17655 SW Shawnee Tr
City Tualatin Zip OR
Email: jan.g.guida@gmail.com



Comment Card

5

Name Rocky Bixby
Address 18126 SW 133rd Terrace
City Tualatin Zip 97062
Email: rocky.bixby@hotmail.com

Will read



Comment Card

6

Name Barbara One Hette
Address 18485 SW Pacific Dr. #21
City Tualatin Zip 97062
Email: beohome@gmail.com

want to speak



Comment Card

7

Name Emily Gonzalez
 Address _____
 City _____ Zip _____
 Email: _____



Comment Card

8

Name Chad Darby
 Address 17660 SW Shawnee Trail
 City Tualatin, OR Zip 97062
 Email: cmdarby@frontier.com



State of Oregon
Department of
Environmental
Quality

Comment Card

Name Christine Tunstall

Address Cheyenne Way

City Tualatin Zip 97062

Email: famtunstall@frontier.com beds, years ago

I used grim's compost in my garden

- verticillium wilt has killed many trees

mushroom compost caused many types of
mushrooms ^{grow in} to my front yard for several
years.

Grimms Fuel Co is located in a high density urban area, surrounded by industrial and high value commercial development and dense residential development. The proposed permit under consideration by DEQ allows Grimms Fuel Co to continue to use the "pile it high" composting method. Though DEQ has made a genuine attempt and has added to the proposed permit some safeguards and requirements, these new requirements will not achieve the end results required to provide maximum protection for our environment, water quality, and the quality of life for the many Tualatin residents living within a short distance to the compost facility.

The issuance of a new permit is an excellent opportunity to require Grimms to significantly update its operations from the "pile and pray" method to one using modern composting practices as windrows, forced aeration, and modern leachate and stormwater run-off retention systems. But this permit fails to do that. Simply put, Grimms is being allowed to just continue business as usual, which includes odor releases, compost piles so large it is impossible to provide the necessary aeration and pathogen reductions, and continued probable harm to groundwater and surface water due to pollution from the leachate and stormwater run-off.

Throughout the proposed permit, it states that Grimms must meet standards as laid out in different OAR statutes. But it has been proven throughout the US and Europe, these standards can not be adequately met with the use of the large static compost pile method.

First, this permit should not be issued until AFTER Grimms has submitted and received approval of its operations plan and its odor minimization plan. Issuing the permit first does not compel Grimms to include in its plans, business practices which can meet the requirements. If DEQ grants this permit to Grimms Fuel before approval of these two important plans, I wonder if one of the operating procedures Grimms will provide is the continued use of their D-9 caterpillar as their primary source of aeration?

Second, this permit should not allow continued use of these extremely large piles, but instead should require windrows of manageable size. The few required changes in this proposed permit includes a 72" probe to measure oxygen and temperature. But how does this short probe provide the information deep within the middle of these extremely large compost piles? This proposed DEQ permit should require the installation and use of a forced aeration system.

Third, IF Grimms applies for and is granted the authorization to receive residential curbside food waste, then additional requirements kick in. However, the requirements in this proposed permit lack specificity regarding windrows or piles, no specificity as to facility design for leachate and stormwater run-off, and there is no requirement for updated forced aeration system into the piles or windrows. The health and well being of the public is not adequately met by these vague requirements.

And finally, I speak for others who could not attend the hearing this evening. We ask DEQ to withhold the granting of this permit to Grimms Fuel Company until Grimms has approved operations and odor minimization plans which include a thorough modernization of its operations. Only through the modernization of its composting business will Grimms Fuel be able to meet the required standards in various applicable OAR statutes and in this proposed DEQ permit.

Jan Giunta
Tualatin Resident
17655 SW Shawnee Trail

JULY 8 2015

Grimm's Fuel

Grimm's may own their land, but they do NOT own the air. Especially the air in my house.
Our air is a shared resource.

If Grimm's were belching out black smoke day and night,
the scale of pollution would be obvious and undeniable.

But Grimm's pollution is invisible and insidious.

If you could SEE the plume of VOCs wafting from their composting piles,
You could record it on video. but unfortunately there is no way to record a smell.

I live more than a MILE away from Grimm's compost piles.
and the stink is strong and totally unpleasant.

Grimm's should not be permitted to spill ~~volatile organic~~ ^{NOXIOUS} compounds into my bedroom and my lungs.
This kind of air pollution is unacceptable.

The off gassing from their industrial composting operation should be filtered and scrubbed
like any other toxic industrial process.

Grimm's is not managing the odor from their operation.

When the waste byproduct of your business spills out beyond your property line and
affects an area of 3 square miles, then you have a serious problem.

My request is simple:

I am asking the DEQ to require that Grimm's contain their pollution within their own property.
and if Grimm's can't do that, then perhaps they need a bigger piece property,
or a much smaller pile of compost.

Questions pertaining to the issuance of a proposed composting permit for Grimm's Fuel.

1. What are the real risks to surface water and ground water at this facility?
2. Why is the height limit of 30 feet or less as required in the permit of 2014 being changed? What is the difference at this time vs. in 2014? If the height limit was an issue at that time why is it not an issue now? What was the basis for the permit issued in May 2014 that is now being reconsidered - what has changed?
3. Why is a plan to be provided by Grimm's 60 days after a permit is issued? Doesn't that seem to be backward? Why isn't Grimm's required to submit their plan before the permit is issued?
4. Does the word "endeavor" mean that the DEQ does not actually inspect yearly? Endeavor sounds as if the DEQ may or may not actually inspect regularly. When was the last time that Grimm's was inspected by the DEQ?
5. How often does Grimm's have to submit storm water samples?
6. Grimm's is too close to residential homes to be dealing with type 3 food waste.
7. What non-vegetative food waste is processed at Grimm's at the present?
8. Is there any possibility of Grimm's ever processing sewage sludge? This is not acceptable when you consider the proximity to homes and businesses.
9. Bulking agents, additives, odor control agents -- what about these? Are they chemicals, are they potentially dangerous?
10. Why were notices not sent to the people who live at Angel Haven Mfg. Home Community. Each one of our homes have a specific address. The community itself has an address of 18485 S.W. Pacific Drive, but each home in the community has a specific space number. My address is: Barbara Ouellette, 18485 S. W. Pacific Drive, Space 21, Tualatin, OR 97062. The DEQ should not rely on the information contained in a specific piece of mail that they send to the management to be relayed to the 124 residents within Angel Haven.

Barbara Ouellette
18485 S.W. Pacific Drive
Space 21
Tualatin, OR 97062

503-625-7935

email: bcohome@gmail.com

To: Marc Stevens
Solid Waste Permit Coordinator, DEQ
From: Pony Ridge Residents, Tualatin
July 8, 2015
Re: Proposed Solid Waste Disposal Site Permit
Grimm's Fuel Co. Tualatin, Oregon

We, the residents of Pony Ridge, are one of two of the residential communities nearest Grimm's Fuel Co. facility (350 yards per Google Map). Pony Ridge has 141 homes with many families living with children and elderly, and also Angel Haven is an over 55 community with about 120 residences.

All we want is to live in an odor free, pollution free neighborhood. Based on the State of Oregon/DEQ compost guidelines and regulations, Grimm's Fuel Company should keep composting odors within the company's property boundaries. We ask that DEQ to enforce its own regulations to Grimm's facility.

Our goal is not to ask Grimm's to cease its operations or to move, but simply to invest in its business and modernize its composting procedures as Natures Needs did in North Plains with a positive result. Such procedures include the use of windrows, bio-filter systems, and lined leachate holding area, etc. We ask Grimm's to have a respect for it's neighbor's by mitigating the odor and keeps the odor within it's boundary.

We continue to oppose the "pile high" method as it is proven, both scientifically and practically, this method does not sufficiently prevent anaerobic conditions and pathogens, nor adequately control dust and vectors-let alone keeping odors and dust within the facility boundaries. Without a basic change, we believe, Grimm's will continue to be out of compliance with DEQ odor regulations-regardless of the terms of this proposed new permit.

Problems with the current and past state of Grimm's operation:

- Too many times, the odor becomes so overwhelming that those of us living closer to the Grimm's compost piles, are forced to close our windows. The strong odor fills up the houses completely. It restricts us from outdoor activities
- Not only the awful odor has degraded our quality of life, but has a negative impact on our property values.
- Mushroom composting must be eliminated from Grimm's products, as mushroom compost stench is extremely nauseating, especially during compost loading stages.

Problems with the DEQ New Proposed Draft Permit:

- In the draft, Grimm's is allowed (with conditions) to receive and process curbside food waste, which includes meat and dairy products. If this happens, the present problem of dust and too frequent odor releases, caused by the use of Grimm's outdated compost practice of "pile high" exacerbate the current situation.
- In this draft, Grimm's is allowed to once again increase the compost piles to extreme and unmanageable heights and diameter. This is one step backward.
- Mushroom composting should not be allowed.

Respectfully:

Ted Saedi

18397 SW 135th Terrace, Tualatin

Mahvash Saedi

18397 SW 135th terrace, Tualatin

Virginia Green

18363 SW 135th Terrace, Tualatin

Colin Green

18363 SW 135th Terrace, Tualatin

Jason Price

18370 SW 135th Terrace, Tualatin

Jennifer Price

18370 SW 135th Terrace, Tualatin

Emily Gonzalez

18342 SW 134th Terrace, Tualatin

Alex Gonzalez

18342 SW 134th Terrace, Tualatin

Patrick Mc Guire

18460 SW 135th Terrace, Tualatin

Jerry Mc Guire

18460 SW 135th Terrace, Tualatin

Kat Taylor

13430 SW 134th Terrace, Tualatin

Wiliam Hale

18404 SW 135th Terrace, Tualatin

Sharon Hale

18404 SW 135th Terrace

Rocky Bixby

18126 SW 133rd Terrace, Tualatin

Cheryl Bixby

18126 SW 133rd Terrace, Tualatin

Hamid Rad

13335 Ute St, Tualatin

Malihe Razavi

13335 Ute St, Tualatin

Jason Campbell

18415 SW 135th Terrace, Tualatin

Melissa Campell

18415 SW 135th Terrace, Tualatin

Andrew Stirling

18383 SW 134th Terrace, Tualatin

Katie Stirling

18383 SW 134th Terrace, Tualatin

Stephen Lanning

18404 SW 134th Terrace, Tualatin

Kristin Lanning

18404 SW 135th Terrace, Tualatin

I am Ted Saedi and I have a master degree in engineering. I have worked as an Engineering Manager for over 20 years. I have lived in Pony Ridge for past 17 years.

Pony Ridge and Angel Haven are two nearest communities to Grimm's facility with almost 260 houses in total. Pony Ridge is located on the opposite side of street from Grimm's Fuel co.

In the New proposal, I believe that DEQ is not being impartial and is favoring Grimm's fuel co. DEQ is not considering the livability of Grimm's neighboring population. It is somehow obvious that DEQ has been influenced by some big shots or agencies to issue this new draft.

1- Shortly after the new permit of last May, and following the appeal by Grimm's, DEQ quietly withdrew the permit without notifying the public and kept it quiet for another year. I believe it was unethical.

2- The provision for Type III Feedstock was convincingly removed from the New Public Notice flyers. This was misleading. It has given people a false impression that the the type III feedstock has been entirely eliminated from this proposal.

3- DEQ is praising Grimm's for doing everything right and that Grimm's is being very cautious of wind direction. Per DEQ: "wind direction and wind speed are constantly monitored at facility" if so, and if effective, I do not know why we are impacted by so much odor and brownish dust.

4- DEQ is repeating that there has been only a couple of complaints in past two decades, but conveniently ignoring to acknowledge over 100 complaints by nearby residents in past couple of years. The fact is that the reason for low complaints in past was that Grimm's odor was not as nasty and as often as it is now. people also did not know where and who to complain.

5- DEQ is referring to 453 people who signed a petition asking DEQ to renew Grimm's a permit of operation. Of course, I would signed it too, but under what permit conditions? Petition had a misleading statement, which was signed by people from Portland, Beaverton, Tigard, Aloha, Lake Oswego and Tualatin and none from nearby residents. I am wonder how many people would have signed it if the question was to say: would you like to live in a malodorous neighborhood adjacent to a composting facility, who uses an outdated method of composting?

6- DEQ is implying that the Pile High method composting is a preferred method of composting for our community. Is there any scientific proof?

7- DEQ is giving Grimm's a permit first and then is asking Grimm's to come up with an odor mitigation plan later. Should it not be the other way around? Shouldn't DEQ and people have a chance to see the mitigation plan first?

8- DEQ has repeatedly stated “ possible” odor impacts to facility neighbors. Is there any doubt that Grimm's composting operation generates odor and is impacting nearby communities and neighboring businesses?

This odor mitigation plan requires an investment in a major change in infrastructure and the mechanics of the facility. It also needs to alter the method of composting from “pile high” to an acceptable method that prevents anaerobic condition.

What is not acceptable as an odor mitigation plan is; watching for wind direction and speed, moisture, etc. as they are not controllable and not always predictable. This is not a reliable plan.

What is not acceptable as an odor mitigation plan is; to “let the neighbors know the compost pile turning days”. This means: Hey neighbors, stink is coming your way, you like it or not.

Odor emission, especially on compost turning days are so strong and noxious that even with closed windows, odor remains inside our home and stinks our clothing.

Grimm's should stop mushroom composting or whatever they are doing with the mushroom compost products, as the stench is unbearable.

In attempt to keeping the unlimited pile high intact, DEQ is proposing a solution by using a 72” monitoring prob. This deserves a scientific explanation as how a 72” monitoring probe can effectively work on a 60' high, 100' wide compost pile? 72” monitoring probe is meant to be used in a windrow method composting and not the pile high. This is not a practical solution and DEQ knows it. How Grimm's is planning to aerate the center of active compost pile without changing it's methodology and infrastructure of composting, for example?

Ted Saedi
18397 SW 135th Terrace
Tualatin, OR 97062

ATASAEDI@HOTMAIL.COM

From: [STEVENS Marc](#)
To: "R B"
Subject: RE: Please Deny Grimm's Fuel a Solid Waste Permit
Date: Wednesday, June 03, 2015 10:21:59 AM

Thank you for your interest. Your comment will become part of the facility's public record at DEQ.

DEQ will respond to all comments following the close of the public comment period.

Regards,

Marc Fairfax Stevens | Environmental Partnerships

Oregon DEQ | Northwest Region
700 NE Multnomah St., Suite 600
Portland, OR 97232-4100
☎ 503.229.5353 | stevens.marc@deq.state.or.us

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Please consider the environment before printing this email.

From: R B [<mailto:rockybixby@hotmail.com>]
Sent: Tuesday, June 02, 2015 18:50
To: STEVENS Marc
Subject: Please Deny Grimm's Fuel a Solid Waste Permit

We are residents of Tualatin living in the Pony Ridge housing area. At least once per week we smell Grimms fuel's compost and the stench is overwhelming. It literally makes me gag when I smell it. I have upper respiratory problems and I am a disabled veteran because of my lungs. On the days I can smell the compost I have to stay inside because I can't hardly breath outside. Also DEQ screened Grimm's Fuel for environmental risks in February 2011. The agency found that the composing facility posed potential risks to surface water and ground water, without enough data to rule conclusively. Grimm's hasn't done anything to control the overwhelming smell coming from their facility or manage the damage done to surface and ground water. Many residents and businesses including Funtime RV have complained, with the outcome of Grimm's stating they are within the correct zoning laws as their only excuse. They haven't provided any solutions, and it is business as usual. If Grimm's wants another permit for solid waste, shouldn't they have to fix the existing problems before another permit is issued possibly causing more damage to surface water, ground water, air quality, and surrounding home values? Please listen to your citizens and deny the permit to Grimm's.

Respectfully,

Rocky & Cheryl Bixby
Community members of Pony Ridge and Tualatin

I have CDO. It's like OCD, but in alphabetical order, like it should be.

From: [Patrick McGuire](#)
To: [STEVENS Marc](#)
Cc: [Gerry McGuire](#); patnorthwet@outlook.com
Subject: Pony Ridge Tualatin
Date: Monday, June 22, 2015 9:29:15 PM

Dear Marc Stevens,

We have recently purchased a rental house in the beautiful, quiet family neighborhood of Pony Ridge and soon we were encountered by unpleasant and stinky compost odor that smells like dog poop- Six feet of it! Our rental is located at 18460 SW 135TH Terrace, Tualatin. If we were aware of this problem before, we would not have considered this community. Since then we found out that this compost facility is operating with an outdated method and that is the major cause of odor generation. We request:

Grimm's to modernize the composting process and away from outdated pile high method, especially where it is located so close to a residential community and businesses.

Grimm's to mitigate the odor and confined it to it's own property.

Grimm's to stop handling mushroom compost.

DEQ to stop the possibility of Grimm's composting curbside food waste completely.

DEQ should not give any kind of permit until Grimm's submit a concrete odor control plan

DEQ and Grimm's should consider livability and quality of life in this community.

Sincerely,

Patrick and Gerry McGuire
1841 Barnes Circle
West Linn, OR 97068
(503) 343-9465

From: [Virginia Green](#)
To: [STEVENS Marc](#)
Subject: Grimm's Fuel Permit Hearing
Date: Monday, July 06, 2015 2:21:46 PM

Dear Mr. Stevens:

As a resident of Pony Ridge I experience the odors and dust coming from Grimms Fuel regularly since I purchased my home here in 2010.

It lowers the quality of life in terms of myself and my family when it smells too bad to be outdoors and when it even smells inside our home.

It will also definately lower the potential value of my home.

I urge you to require Grimm's to update it's composting processes and to cease using the "Pile High" method for now and for any future development.

Sincerely,
Virginia Green
135th Terrace

From: [STEVENS Marc](#)
To: "R B"
Subject: RE: Please Deny Grimm's Fuel a Solid Waste Permit
Date: Wednesday, June 03, 2015 10:21:59 AM

Thank you for your interest. Your comment will become part of the facility's public record at DEQ.

DEQ will respond to all comments following the close of the public comment period.

Regards,

Marc Fairfax Stevens | Environmental Partnerships

Oregon DEQ | Northwest Region
700 NE Multnomah St., Suite 600
Portland, OR 97232-4100
☎ 503.229.5353 | stevens.marc@deq.state.or.us

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Please consider the environment before printing this email.

From: R B [<mailto:rockybixby@hotmail.com>]
Sent: Tuesday, June 02, 2015 18:50
To: STEVENS Marc
Subject: Please Deny Grimm's Fuel a Solid Waste Permit

We are residents of Tualatin living in the Pony Ridge housing area. At least once per week we smell Grimms fuel's compost and the stench is overwhelming. It literally makes me gag when I smell it. I have upper respiratory problems and I am a disabled veteran because of my lungs. On the days I can smell the compost I have to stay inside because I can't hardly breath outside. Also DEQ screened Grimm's Fuel for environmental risks in February 2011. The agency found that the composing facility posed potential risks to surface water and ground water, without enough data to rule conclusively. Grimm's hasn't done anything to control the overwhelming smell coming from their facility or manage the damage done to surface and ground water. Many residents and businesses including Funtime RV have complained, with the outcome of Grimm's stating they are within the correct zoning laws as their only excuse. They haven't provided any solutions, and it is business as usual. If Grimm's wants another permit for solid waste, shouldn't they have to fix the existing problems before another permit is issued possibly causing more damage to surface water, ground water, air quality, and surrounding home values? Please listen to your citizens and deny the permit to Grimm's.

Respectfully,

Rocky & Cheryl Bixby
Community members of Pony Ridge and Tualatin

I have CDO. It's like OCD, but in alphabetical order, like it should be.

Dear Mr. Stevens,

My name is Mike Musselman. We have lived in the Tualatin/Sherwood area for the last 25 years and for several of those years we lived near 99w adjacent to the Grimm's Fuel composting plant. During that time we occasionally experienced some odors from Grimm's but nothing like what was described at the July 8th public hearing.

Frankly I found the odor claims unbelievable or at least, greatly exaggerated! Kids unable to play outside without vomiting? Odors so strong that they penetrate walls and stink up the clothes in the closet? Odors a mile from the facility? Unbelievable! When we lived next door to the facility we never experienced anything like that.

Currently we live a little over a mile from Grimm's in Sherwood and we have NEVER smelled any odors from Grimm's. The Pride Disposal transfer station and the rendering plant on Oregon Street occasionally stink up the neighborhood but there have never been any compost odors from Grimm's.

Does the DEQ do anything to verify these crazy claims or do they simply take them at face value? There were a lot of angry people at that hearing and it seems obvious that they were just making stuff up or exaggerating things to make Grimm's look bad.

I know that Grimm's has made many changes in their operation over the years in order to reduce odors. At this point, you rarely even smell them unless you are standing at the dump area itself. I believe they're doing a good job.

I am in support of the renewal for the Grimm's Fuel composting permit. Please enter my comments into the public record.

Respectfully,

Mike Musselman

From: [Chad Darby](#)
To: [STEVENS Marc](#)
Subject: Grimm's Fuel Permit public comment
Date: Tuesday, July 14, 2015 3:26:57 PM

1. Human health risk assessment- the permit review report claims that human health risk was evaluated along with environmental risk. I would like to see the human health risk evaluation and see if it includes all exposure pathways as well as discussion of sensitive receptors. Also, whether it has been done according to any protocol. There is a senior center very close to the facility with residents. I know that they have to keep their windows closed a lot of the time due to odor, but they are also more susceptible to respiratory ailments, which compost emissions could exacerbate.
2. Pile heights- DEQ rolled over awfully quickly on the pile height requirement. I'd like to know the evidence that suggests this isn't effective. I agree that the facility has always needed better monitoring, but monitoring does not mean that pile height is irrelevant. The higher the pile the greater the mass of compost that is distant from the surface where air exchange would provide aerobic conditions. Also, many of the public commented that the high pile heights were resulting in emissions to their properties, including other businesses that were having to wash their RVs almost weekly to get the dust off. How is Grimm's allowed to have pile heights that contribute to windblown dust events that impact neighbors? What evidence suggested that pile height was irrelevant to windblown emissions? I think they need monitoring **and** pile height restrictions. Let's see DEQ's evaluation that pile height has no impact.
3. Monitoring- A pile that is 50 feet high will be about 100 feet across at the base. How is a 6' probe going to test for oxygen in the center. At the hearing DEQ stated that it was the longest probe available so that was the reason for a short probe. Then DEQ should specify a procedure for measuring the center of the pile. For instance, during pile turning the probe will be inserted at least 5' into the open face of the pile within 5 minutes of opening the pile. It isn't that hard to come up with a procedure to compensate for the equipment available. However, for some inexplicable reason DEQ leaves it up to the facility to choose a procedure. I would like to see DEQ take a more active role, but at least explain why this isn't proceduralized. Lots of facilities in Oregon from wood products to petroleum storage have very prescriptive methods for measuring vital parameters **in their permit**. Also, when anaerobic conditions exist odor is worse and methane is being produced, which is a potent greenhouse gas. How is the facility monitoring/managing that?
4. Standards- What good is monitoring without standards? Why has DEQ not mandated a certain oxygen level, Carbon to Nitrogen Level, and moisture level based on the science. We know what aerobic conditions are, why can't DEQ specify an oxygen level? At the hearing DEQ said that every composting facility is unique. That's not a good answer. DEQ specifies very strict standards for water quality in this state. DEQ specifies detailed emission limits. Why is the solid waste division so much more reluctant to use the science to demand levels of performance so that families aren't driven out of their yards by odor?
5. Type 3 waste- Jeff Grimm claims he doesn't want Type 3 waste and has no plans to handle it. I see nothing in the regulations to suggest that solid waste permits include Type 3 waste or steps to become capable of handling Type 3 waste. Type 3

waste could be included under prohibited wastes just as DEQ already eliminated animal carcasses. If DEQ is telling the truth that there are no plans and that Jeff doesn't want Type 3 waste then prohibit it. Jeff can always get a permit amendment in the future to include it if he's willing to admit that he wants it. What I think is happening here is that Metro is interested in Grimm's handling Portland food waste. Let's be honest if that's the case. Otherwise explain why you can't prohibit Type 3 waste and provide us a citation for that.

6. Pathogens- I don't believe Grimm's is killing all pathogens now, so what makes us believe that high anaerobic and poorly mixed piles will solve that in the future? The temperature probe is only good for 6' feet of the outer edge of the pile. I have had to take out all my maple trees that I planted in Grimm's soil. Those that were not are still living. Those planted in Grimm's soil died of Verticillium Wilt from a fungus in soil. My trees died after 8 years. Independently the specialist at Al's Nursery said that they would guess my trees lived 8-10 years before they died. They were exactly right. They said that is how long it takes to typically kill a healthy maple. All of the trees in my yard that were there when I moved in 12 years ago are still doing well. Only in the areas of my yard where I brought in soil did I have a problem. Most of Grimm's customers, including nurseries, might not even be aware of this pathogen because of the amount of time it takes to kill the tree. The pathogen testing in the permit is woefully inadequate. There should be testing every 1-2 weeks, not every 3 months. Also, the pathogen list should be extensive, including fungus, bacteria, and viruses. Because of the potential health risks of processing food waste (human viruses and bacteria) the facility should never be allowed to handle this waste without a windrow or forcefully aerated pile. I also have no faith that the pile high technique will ensure good observation of temperatures throughout a pile unless there is a good statistically based sampling procedure specified in the permit (not in some future plan).

7. Plan- The public should be aware of the material handling plan at Grimm's before the public hearing and comment period, not after. This makes no sense. DEQ has failed to provide standards for oxygen, C/N ratio, moisture, etc. I would feel much better having public comment on the plan.

Thanks for taking my comments,

Chad Darby, Tualatin Resident

From: [Rob Gamache](#)
To: [STEVENS Marc](#)
Subject: FW: Grimm's Fuel
Date: Tuesday, July 14, 2015 3:15:32 PM

From: Rob Gamache
Sent: Tuesday, July 14, 2015 2:17 PM
To: 'stevens.marc@deq-state.or.us'
Subject: Grimm's Fuel

Mr. Stevens,

I have been a resident of the Tualatin/Sherwood community for 35 years. I'm very familiar with Grimm's Fuel Company as they do a great service to our community. Grimm's employs a number of people from the local community, provides a recycling center, and a landscaping/garden soil center for our homes. Their facility is in a very convenient location for both Sherwood, Tualatin, and Tigard residents. I have made many trips to their facility for both dropping off yard debris and picking up product for our landscaping needs. While at their facility I have noticed nothing offensive, in any way, only a professional environment for the public and their employees. We need this business to stay active and they definitely have my family's full support.

Kind Regards,

Rob Gamache

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From: [YELTON-BRAM Tiffany](#)
To: [OBRIEN Audrey](#)
Subject: FW: copy of comments about Grimm's Fuel
Date: Thursday, July 23, 2015 2:11:33 PM

FYI

-----Original Message-----

From: Dorothy Shoemaker [<mailto:dorothyshoemaker@centurylink.net>]
Sent: Thursday, July 23, 2015 1:46 PM
To: YELTON-BRAM Tiffany
Subject: copy of comments about Grimm's Fuel

Hi Tiffany,

I just sent comments to Marc Stevens about a proposed composting permit. Grimm's Fuel wants to have an unrestricted height on their compost pile.

Here's what I sent:

Hello Marc,

I'm commenting on the Grimm's Fuel proposed composting permit. Grimm's Fuel had their permit renewed recently, but they objected to the limit on the compost pile height. So they are operating under an extension of an old permit, and these comments are about a proposed permit with no limit to the compost height.

The request for comments is at this link:

<http://www.oregon.gov/deq/docs/073115grimm.pdf>

The compost pile was going to be limited to 30 feet. Since compost is normally removed from the pile and used or sold for use elsewhere, this should not be a problem. Is Grimm's Fuel planning to just let the compost pile grow and grow?

The reasons to make compost are mostly for fertilizer, and sometimes for incendiary use or fuel. In either case, the compost is removed from the pile, making the pile smaller for a while.

What is the compost being made for? And why would they need to let the pile get higher than 30 feet?

Thanks for taking comments,
Dorothy Shoemaker

From: [Steve](#)
To: [STEVENS Marc](#)
Subject: DEQ Permit 1433, Grimms Fuel Company
Date: Thursday, July 23, 2015 10:08:15 AM
Attachments: [grimmfuel.png](#)

Attn: Marc Stevens

I would like to enter a comment for the record of the Grimm's Fuel Company permit 1433.

At the public meeting, Juanita Pohl Center 7/8/2015, I heard many of those who are opposed the operation testify that there were many, many odor complaints that had been reported in the recent period of time. I thought I would check the facts and sent a request to Jeff Grimm.

Grimm's Fuel Company has received a total of 4 odor complaints in the last 12 months and only 1 complaint in 2015 (included in the 12 month total of 4). (See Grimm's response below)

Additionally, those opposed to the operation were quite certain that Grimm's operation using large pile composting was antiquated and using wind rows like Natures Needs in North Plains was a much better process.

I asked Daniel Hough of DEQ for an accounting of both Grimm's odor complaints as well as Natures Needs. I asked for the last 12 months period as this would be the time since Natures Needs was required to stop taking commercial food waste and after the last of those loads had been processed.

Natures Needs has had a total of 36 odor complaints in the last 12 months and 21 of those complaints are in 2015.

So even with the elimination of commercial food waste, which constituted 86% of their food waste and 30% of their total intake volume, Natures Needs is far from odor free using their wind row composting process.

Thank you,

Stephen Titus
10170 SW Sedlak Ct
Tualatin, OR

From: Jeff Grimm [mailto:jefgfc@teleport.com]
Sent: Thursday, July 9, 2015 4:00 PM
To: Steve <sttitus@gmail.com>
Subject: Re: Permit Meeting, Juanita Pohl 7/8/2015

Mr. Titus,

Thanks for your inquiry. I also found the meeting interesting, as there was a lot of misinformation flying around. For example, Mr. Saedi testified that he knows that hundreds of odor complaints have been filed against Grimm's in the last 2 years. That's simple not true. In fact our odor log shows a total of 52 complaints in the last 20 years that have been reported to the DEQ, Metro, City of Tualatin and Grimm's. While that's not ideal, it's a far cry from Mr. Saedi's claim. Several of those 52 complaints cannot be attributed to our facility or are dubious in nature but that's another matter.

To answer your question(s), thus far in 2015 we have received 1 odor complaint and in the last 12 months we have received a total of 4 odor complaints. In the last couple of years we have made several operational changes at the

facility that have had a definite impact on our ability to minimize odors and I am certain that these changes will continue to show positive results.

Here at Grimm's we work hard to minimize our odors and I can assure you that we will continue to do everything in our power to minimize our impacts on the surrounding neighbors. While the recent modifications at the facility have further lessened our odors, it is impossible to eliminate them completely from any composting operation.

Thank you for your concern and please do not hesitate to contact me if you have any other questions or if I can be of further assistance.

Respectfully,

Jeff Grimm | General Manager

direct 503.636.3623 | fax 503.692.2015 |
Grimm's Fuel | 18850 SW Cipole Rd | Tualatin, OR 97062
www.grimmsfuel.com



----- Original Message -----

From: [Steve](#)
To: [Jeff Grimm](#)
Sent: Thursday, July 09, 2015 10:23 AM
Subject: Permit Meeting, Juanita Pohl 7/8/2015

Jeff,

It was an interesting meeting last night. I was surprised at how many comments were related to odors as it's my understanding there have not been many odor complaints in the history of Grimm's, especially recently.

Some of the meeting participants mentioned that they would have complained but they didn't know who to complain to. Calling you, the City of Tualatin, Metro, DEQ or Washington County seems pretty obvious to me especially after the past neighborhood meetings and the public meeting on your permit in the fall of 2013.

As a resident of Tualatin I've been a long time supporter of Grimm's and know that composting is sometimes a messy business. You know that I have encouraged you to do all you can to be a good neighbor.

I would like to enter into the DEQ meeting record the actual number of complaints you have received this year and also the last twelve months as those figures were not mentioned by DEQ last night in their meeting introduction.

Thank you,

Steve Titus

----- Forwarded message -----

From: **STEVENS Marc** <Stevens.Marc@deq.state.or.us>
Date: Tue, Jun 2, 2015 at 4:36 PM
Subject: Courtesy Copy: DEQ seeks comments on proposed solid waste composting permit for Grimm's

Fuel in Tualatin

To: STEVENS Marc <Stevens.Marc@deq.state.or.us>

This is a courtesy copy of an email bulletin sent by Marc Stevens.

DEQ seeks comments on the proposed DEQ solid waste composting permit for Grimm's Fuel, a composting facility in Tualatin, OR. There will be a public hearing on the permit, 6:30 p.m. Wednesday, July 8, 2015 at Juanita Pohl Center, 8513 SW Tualatin Rd., Tualatin, OR 97062. For more information, please see the public notice at the link below:

<http://www.oregon.gov/deq/pages/publicnotice.aspx>

From: [Jerry Glover](#)
To: [STEVENS Marc](#)
Subject: Grimm's DEQ permit
Date: Friday, July 24, 2015 1:24:47 PM

I bought this home in Angel Haven M.H. park may 23,2015 and didn't learn of this compost thing until one morning i went outside and asked one of the neighbors what that god-awful smell was? He said it was Grimm's compost pile across the street, and he said it was worse on different days. I don't think I would have bought this house if I would have been aware of it. This smell absolutely de-values my house value, let alone putting up with this smell. I would vote to not even continue their permit. Gerald E. Glover space 88 Angel Haven M.H. park,Tualatin,Or. 97062 phone 541-701-8271

RE: Proposed Composting Permit, Grimm's Fuel, 2015

To: Marc Stevens
Solid Waste Permit Coordinator
Sent via email.

CC: Daniel Hough and Audrey Obrien
Sent via email.

July 25, 2015

Dear DEQ Staff:

Permit Evaluation:

In the DEQ prepared "Permit Evaluation", it is deemed by DEQ that Grimm's is a "high risk" facility as per page 3 of Permit Evaluation, Chapter Environmental and Public Health Concerns. In this chapter, DEQ finds that Grimms poses an environmental risk to surface water and to groundwater, however, at this time DEQ does not have "sufficient data to demonstrate that Grimm's composting operations would be protective of groundwater." (Page 3, Groundwater Screening, lines 1-2)

With DEQ determination that Grimms is a "high risk" facility, more specific monitoring and assessment standards must be incorporated into this proposed permit. Second, before a permit is issued, all pertinent information and relevant data concerning surface and groundwater should be acquired and analyzed by DEQ and then DEQ's findings made public, followed by a public comment period.

DEQ Solid Waste Division: Since DEQ plans to issue a permit to Grimm's without "adequate" information to determine Grimm's operational impacts on groundwater and surface water, **please provide DEQ's reasoning to do so and provide the scientific data** which causes DEQ to be comfortable that present conditions do not pose harms to the environment. Please, specifically, address why DEQ plans to issue a permit when acknowledging the present condition that a "majority of decomposition occurs on paved areas, stormwater discharge eventually enters into a shallow, unlined, vegetated bioswale before exiting the property." (page3)

DEQ Solid Waste Division: **Please provide DEQ's rationale and the scientific data** which DEQ relied upon to determine that Grimm's is a "low risk" facility relative to financial assurance risk. **Please explain** that if DEQ has "inadequate" information relative to groundwater and surface water impacts, **then what specific measures did DEQ use** to determine Grimms is "not likely to result in significant amounts of residual water materials or contamination at the time of site closure." (pages 4-5) **Please make public** all evaluative information DEQ used to determine Grimm's to be a "low-risk" facility for financial assurance, make public DEQs' evaluations based upon this evaluative data, and **include DEQ's reasoning** that Grimm's is a low-risk facility.

DEQ Solid Waste Division: As stated in the introduction (page1) the new DEQ rules require compost facilities to submit information to DEQ for an "environmental and human health risk assessment... to determine the type of permit required for their compost operations." Regarding the human health assessment as again stated on page 3, "...Public Health Concerns", **please provide the public with not only the human health assessment but all data and scientific information that comprises this assessment.** On page one, paragraph 1 it states that Grimm's Fuel Company submitted

a timely application-and that is fine but what does that have to do with the human health assessment? I would like to review the human health assessment completed by DEQ and relied upon to choose the type of permit issued to Grimm's.

The operational impacts by Grimms Fuel on not only the environment but also on human health are governed by DEQ under its 2009 rules (page 1). The impacts to human health are not adequately addressed in this proposed permit. There are no requirements for monitoring of odor, dust, and particulate airborne matter outside the facility boundaries. It appears in the Introduction section of the Permit Evaluation, that DEQ is not aware of or ignores the aged and infirmed citizens within a short distance from the Grimms facility (Angel Haven, Cedar Crest Alzheimer's facility, and Riverwood senior care center). Additionally, there seems to be no or little awareness of the substantial number of children in the Pony Ridge area, also very nearby the Grimm's facility. Each of these groups is especially sensitive populations to dust, odor, and airborne particulate matter.

DEQ Solid Waste Division: I request DEQ explain why no such monitoring with accompanying measurable standards aren't required in this proposed permit-especially in light of the sensitive populations nearby the facility. Further, I ask that additional requirements be added to the permit that Grimm's Fuel and DEQ conduct an initial monitoring and analysis of dust and airborne particulate matter before a permit is issued, and substantive and effective on-going monitoring occur with required standards for odor, dust, and particulate matter not only within the facility boundaries, but also outside the boundaries. **Only with this information can DEQ meets its most basic requirement: to protect public health.**

Thank you for this opportunity to comment, and I look forward to your answers and the information I've requested.

Jan Giunta
17655 SW Shawnee Trail, Tualatin OR 97062

To: Marc Stevens
Solid Waste Permit Coordinator

cc: Daniel Hough Audrey O'Brien

Subject: **Comments on Proposed Composting Permit for Grimms Fuel 2015**

July 26, 2015

DEQ

The following are some of my concerns regarding the above permit.

Permit sections 1.3, 1.4 Criteria for Residential Food Waste

Why authorize type 3 feedstocks given that stated at the hearing on July 8, 2015 that Grimm's Fuel has not requested to do so.

As a resident and homeowner of Pony Ridge I request any reference or acceptance of Residential Food Waste collection be removed from the permit.

Do residents have any power over DEQ's decision on this issue? What should we do to have DEQ remove all references to type 3 feedstocks from the draft?

Permit section 4.4 Process Controls

Oxygen level: **Pile heights are a concern in that a 72 inch probe is inadequate to reach middle and lower parts of the huge compost piles presently at Grimms** to check the oxygen level and therefore where it contains bacterial odors. **I request that the piles be no more than 8 feet such as it is at other facilities.** How can DEQ mandate this change and why not?

Permit section 4.6 Odor Minimization Plan

I request that an odor study be completed by a 3rd party and a human health assessment be done regarding dust and odor and its potential affect on people. I am 82 years old and am concerned both for my health and enjoyment of the area in which I reside and the affect on the monetary value of my home.

Mushroom composting is being done and creates a very bad stench and might possibly have some negative affect on human health. This issue of Mushroom composting is not addressed in the proposed permit. **I ask that it not be allowed.** Does DEQ have any regulation on mushroom composting allowed in other areas with the same methodology as Grimms?

Thank you for this opportunity to comment.

Virginia Green
18363 SW 135th Terrace
Tualatin, OR 97062

From: [Stevany Jergentz](#)
To: [STEVENS Marc](#)
Subject: Grimms fuel
Date: Tuesday, July 28, 2015 4:29:30 PM

Hi, I live in pony ridge and was given your email by a neighbor. I have heard a lot of my neighbors are making things difficult for grimms and honestly, I've lived in this area for almost 4 years and I could count on one hand the amount of times I've been able to smell grimms, it's really not a big deal at all. I really can't understand the issue and just wanted to let you know. If you have any questions please don't hesitate to reply.

Thank you.
Stevany Jergentz
134th terrace

Sent from my iPhone

From: [Robin](#)
To: [STEVENS Marc](#)
Subject: Comments related to grimm"s company
Date: Wednesday, July 29, 2015 2:42:13 PM

Dear Mr Marc,

I would like to go on record for not supporting the fuel companies continued application.

I have lived here in Pony Ridge across 99w for 9 years. The smells continue to be disgusting. Worse some times lately since adding the "organic recycle." Some times are worse than others. The odors are none the less, disgusting. I'm not opposed to business or company expansion yet it truly seems Grimm's would be better excepted out in a rural open air area.

I'm sure you've noted the tax rolls of this neighborhood. It seems paying almost 4k per year in this neighborhood would have something to do with eliminating these smells. Livability is markedly diminished with Grimm's nausease smells.

Please reconsider allowing Grimm's to continue infecting this neighborhood.

Thank you for your consideration.

Robin Stephenson

Sent from my iPad

From: joakman259@aol.com
To: [STEVENS Marc](#)
Subject: Grimms
Date: Thursday, July 30, 2015 9:36:20 AM

I do not want Grimm's to incorporate food into their compost process! It already smells bad enough when the wind is blowing, adding food to the mix will make this area unlivable! I think Grimm's should be moved to a location further out of town. If Tualatin desires more families and better living conditions, we cannot have a composting company within close range of apartment and house dwellings. This seems like a no-brainer, yet the pile of compost seems to be getting larger each time I pass.

DEQ Solid Waste Permit Coordinator
Stevens.marc@deq.state.or.us

July 30, 2015,

Grimm's Fuel is attempting to obtain a new Solid Waste permit. I am writing in opposition to allowing this new permit until DEQ discloses how it will monitor the proposed changes. My understanding is that currently Grimm's is allowed to have 30' piles of composting which is supposed to allow the aerobic activity needed to kill Salmonella and other dangerous bacteria in addition to providing odor control.

My question is: How is DEQ planning to measure the methane gases released due to anaerobic activity, what will be the frequency of measurement, and how will it be ascertained if testing is in compliance with current statutes. Also with technological advances, is composting using 30' mounds the safest and best way to protect out air and water quality. My understanding is that most state wide composting facilities no longer use this way of composting, but use other ways that compost leaving cleaner air and ground water.

Mr. Grimm ascertains that running a composting business for 30 years gives him the knowledge to do the best job available to compost to current standards.

As a 12 year resident of Angel Haven, a 55+ manufactured home community, within walking distance of Grimm's, I beg to differ. The odors that emanate from the facility can bring a coughing spell to even the healthiest individual and the smoke and flames that at times arise from the mounds, demonstrate little temperature control.

Yes Mr. Grimm may have built his facility 30 years ago, but since that time a business and residential community in addition to a wild life preserve have come into the area and he is no longer surrounded by farmland and fields. He needs to be held accountable as to how his business affects the community around him.

Thank you,

Claudine Muller
18485 SW Pacific Dr. #55
Tualatin, OR 97062
(503) 523-6033
Arletteno1@yahoo.com

To: DEQ Solid Waste Permit Coordinator
700 NE Multnomah St. suit 600
Portland, OR 97323-4100

From: Ted Saedi
18397 SW 135th Ter
Tualatin, OR 97062

RE: Permit Evaluation Report
Proposed Solid Waste Composting Permit # 1433
Grimm's Fuel Co.

July 30, 2015

Under Permit Discussion, page 4, third line “Based on this evaluation DEQ screened Grimm’s composting operations as having the **potential to cause odor impacts outside the boundaries of the facility**” The word **potential** has been used at least 7 other times in text in reference to odor. Now that it is proven that **in fact odor impacts outside Grimm's boundaries**, DEQ should remove the word **potential** in reference to odor. And if not, I would like to know what motivates DEQ to keep this common knowledge obscured.

Under 1.0 Authorization- 1.3 **Criteria for residential food waste authorization**

What is the justification for keeping type III feedstocks allowance in the permit when Grimm's has stated no interest? **Please remove**. This is a real threat to the neighborhood. And while Grimm's is currently unable to manage odor impacts beyond it's boundary now, what is the guarantee that the odor problem would not be exacerbated by adding type III.

Under Operation Plan- 4.1 6th bullet point, **Updated Odor Minimization Plan**. Is there any odor minimization plan in effect currently? and if yes, I would like to see this existing plan.

Under 4.4 **Process Controls**- a bullet point should be added for monitoring **C/N ratio** to this section.

DEQ is suggesting to “**Monitor at locations and frequency representative of active pile composting using a minimum 72” probe**”. At the July 8th Hearing in Tualatin, DEQ was asked the practicality of this method of monitoring. regrettably, we did not hear a convincing response. **My question** is, now that DEQ has realized that 72” long monitor is not a reliable method, what is the alternative plan? Is there any chance that Grimm's new permit will include the 72” probe as a monitoring devise, where piles are considerably deeper than 72”? if yes, what would be the justification for its approval?

What is the **purpose of monitoring** if no air is being mechanically delivered to the middle of pile? Same goes for other sensing probes.

Inspection- What will triggers a facility inspection? How would the public know of the result? I would like to know if the public is authorized to observe the inspections?

Under 4.5 **Odor Minimization Plan;**

E. Forming windrows or other composting piles into a size and shape favorable to minimizing odors.

Since DEQ is acknowledging the effectiveness of the smaller pile methods, my **question is why**

Grimm's is not considering this alternative method?

Under **Odor Screening**: “Grimm’s is an existing composting operation that uses a large pile composting method rather than **windrows**. This means that sections of Grimm’s composting pile are in various composting stages at any given time. New material added to the top of the pile **causes less volatile organic compounds to be released into the atmosphere compared to open windrow**”
My question is; Is there any scientific evidence for this statement/theory? Common sense tells us that any dense material (due to excess weight of higher pile) decreases air volume in pile, causes less oxygen for aerobic process, especially at the middle and bottom of pile.

Under 8.1 **Mid-term review** add a bullet point to this section to read: **(X) number of complaints** from neighboring communities, businesses and other concern individuals and organizations. This also should trigger a mid-term review. **Is this a reasonable and logical request?**

Under 8.5 **Public participation**. “Significant changes to the permit will be made public by the issuance of a public notice as required by DEQ rules”. **My question is, is the increasing in production volume, changing the method of operations, expanding land use, etc. are consider to be significant?**

Under 9.4 **Air quality**. “Dust and malodorous odor must be controlled in accordance with the DEQ rules on air pollution”

My question is:

Does Grimm's follow this DEQ rules?

Is there or has there been any monitoring/sampling performed on air safety (i.e. pathogens, etc.)? As elderly and children makes up a large population of Grimm's residential neighbors and retirement facilities.

Once DEQ receives Grimm's suggestion for addressing the permit requirements, does the public get a chance to review and comment on those suggestions before they are approved by DEQ?

Is there any **time frame** for Grimm's to obtain a new permit and how long it could be delayed with multiple appeals? Will DEQ notify the public with the appeal (if any) and the decision of DEQ **immediately** afterward?

Mushroom Compost-Does DEQ have any rule(s) on mushroom composting? if not, DEQ needs to consider a ruling especially in an urban area.

I think if Grimm's wants to show any respect for it's neighbors, Grimm's should voluntarily cease mushroom composting to begin with.

Looking forward to your response to my questions.

Thank you for allowing me to comment.

Regards, Ted Saedi
Via Email

7/31/15

To: Marc Steven
Solid Waste Permit Coordinator

cc: Daniel Hough, Audrey O'Brien

Comments On Proposed Composting Permit For Grimm's Fuel 2015

I am a resident of Pony Ridge, across the highway from Grimm's Fuel. I have the following questions and comments regarding the proposed permitting of Grimm's Fuel.

Given that area residence have complained at public hearings of adverse health effects resulting from poor air quality arriving to the neighborhood from Grimm's Fuel, including complaints of chronic respiratory illness, vomiting, etc., what more is necessary for the Solid Waste division at DEQ to alert the air quality division at DEQ, or other responsible party, of an *air quality problem* requiring investigation?

Given that Grimm's can appeal permitting, and thereby can stall indefinitely implementation of new procedures through repeated appeals, allowing Grimm's to do business under the permitting they prefer (the out-of-date expired permit) for as long as they continue to appeal, what process is in place to prevent this real possibility?

Given that the only existing commercially available composting probe is limited to 72", why doesn't the permit require that piles sizes be limited to those that can be accurately tested by a 72" probe? This would not interfere with their planning but rather provide reasonable boundaries, thereby avoiding future disputes.

How will the new permit's "odor minimization" requirement be tested and enforced at Grimm's? 4.6 Odor Minimization Plan Implementation.

Given that neighborhood residence have testified in large numbers to all manner of negative effects resulting from odors that originate at Grimm's, language in the extant permit should be changed stating that Grimm's has the "*potential*" to generate offsite odors to "*generates offsite odors.*"

Once Grimm's Fuel submits its updated operations plan to address the permit requirement and is approved by DEQ, how much time does Grimm's have to implement their plan?

Thank you,

Colin Green

18363 SW 135th Terrace
Tualatin Oregon
97062

From: [John Cesnalis](#)
To: [STEVENS Marc](#)
Subject: Grim's Recycling Permit
Date: Friday, July 31, 2015 10:16:37 AM

My husband and I are very supportive of Brett Hamilton's (River Park C101) suggestions for eliminating the odor problems caused by Grimm's organic waste recycling. We urge that his suggestions be incorporated in any permit issued.
Carol & John Cesnalis Tualatin, Oregon

Comments on the Solid Waste Disposal Site Permit for Grimm's Fuel, Permit number 1433

1. Environmental and Public Health Concerns- The only impact I see considered in the review report is odor. Odor typically does not have health impacts associated with it from organic sources. However, pathogens that are airborne and windblown dust can have serious impacts. I would like to see the human health impact analysis that has been done for this. If these have not been looked at, particularly with a senior center and Alzheimer's unit across the road, then a proper analysis has not been done. The review report says that "DEQ staff evaluated Grimm's Fuel Company compost operations for potential environmental and human health risks.." If so, where is the analysis. The public should be able to see it and it should include all exposure pathways.
2. Windblown Dust- DEQ had required Grimm's to limit their pile heights, but has since changed position on that. Windblown dust is directly related to pile height and size. Calculations should be done per EPA's AP-42 methodology to determine the impacts from different pile sizes. Grimm's pile height is now at a level where there is clear line of site to neighboring businesses and residences despite being located in a low area. There is nothing to prevent dust from blowing directly into the surrounding neighborhoods and the senior center area. I'm concerned about potential respiratory impacts to the seniors from molds, fungus, and spores that will be airborne from Grimm's Fuel. There has been no study to date on the deposition off-site, how pile height relates to emissions, and how wind screening could be effective. All of the available science indicates that the taller pile heights will lead to more windblown emissions and more anaerobic conditions in the interior of the piles.
3. Condition 1.3B.iv.- This states that there should be monitoring of C:N ratio and porosity, but these parameters are not mentioned in Condition 4.4. What is the monitoring method and requirement for this? How will this information be used? What are the ranges of C:N that DEQ considers ideal for good composting?
4. Condition 1.3B.v.- There should be a prohibition in the permit to compost with anaerobic conditions. Without more specific prohibitions the permit may be unenforceable. Are conditions in an operations plan enforceable with penalties? Why are the conditions that protect the public not stated in the permit itself, such as standards for oxygen levels, porosity, odor, etc.
5. Condition 1.2- Type 3 feedstocks are not desired according to Jeff Grimm and should not be allowed until Grimm's establishes a good track record on odor and off-site impacts. A study should first be considered with 1 year of ambient monitoring at the senior center to ensure that pathogens will not be transferred off-site with windblown particulate. If Jeff does not want Type 3 feedstocks, as indicated at two public meetings, then DEQ does not need to include it in his permit. Issue a permit for the operation that currently exists and have a permit modification later for Type 3 feedstocks. What is the regulatory driver to include Type 3 if the facility and community do not want such language in the permit?
6. Condition 1.4- Citizens should be involved in the Food Waste Demonstration Project if and when it happens. There should be involvement from the residents with regard to an odor study during the demonstration project. If Grimm's does not trust citizen involvement, then a third party odor study should be conducted with an odor panel at specific identified odor events. Citizen

comment should be allowed on the Demonstration Project evaluation report. Citizens should be notified prior to the commencement of a Demonstration Project.

7. Condition 1.5- Other feedstocks should be prohibited without a permit modification or the conducting of an additional Demonstration Project, during which the public should be notified that one is being conducted.
8. Section 2.0- There are no prohibitions in here on anaerobic conditions. Why not? Why are there no prohibitions against selling compost that has not met the time, temperature, and oxygen requirements to ensure that pathogens are dead?
9. Condition 2.3- The facility should notify DEQ within 24 hours.
10. Condition 2.3- The facility should not be allowed to store hazardous waste for 90 days. There is no reason it cannot be dealt with and removed within 48 hours just like putrescible wastes. Hazardous waste presents a much greater threat to the watershed than putrescible wastes.
11. Condition 3.2.4- How is this condition going to be administered. The facility already has impacts from odor and windblown dust off-site. What are the remedies for the public under this condition. How can the facility be permitted when they are already in violation of such a condition. If DEQ is in the position to evaluate design and construction, then how and why is a large static pile system allowed? This design and construction has no place at a facility that is trying to destroy pathogens and located near sensitive receptors such as the senior center. I have not see DEQ do anything to date to enforce this provision so it effectively has no meaning.
12. Condition 3.3- There should be a requirement for tests of fungus, molds, and spores as long as DEQ is going to be allowing off-site windblown dust to impact residents. As someone that lost several trees to Verticillium Wilt from soil obtained from Grimm's I would like to see the list of pathogens expanded to include this particular pathogen. Results of testing should be made publicly available.
13. Condition 3.3.2 Testing frequency- For type 1 and 2 feedstocks it says a maximum of once every three months. First, this should say "minimum" and secondly, it should be much more frequently such as weekly from material being loaded for sale. For type 3 feedstocks where pathogens can be human-borne, testing should be at least weekly, if not daily, to ensure protection of people coming in contact with the material. This would not need to be as frequent if I had faith that Grimm's had designed and constructed a system that leads to good aerobic conditions at the right temperature for the right length of time.
14. Condition 4.4- There are no procedures specified to get representative samples. The procedures should be in the permit where they will be repeated consistently and be enforceable.
15. Condition 4.4- Not all parameters are included here. Also this monitoring is meaningless because the facility has no standards to meet. Why are there no standards for oxygen levels? Doesn't the science support conditions necessary for aerobic activity in composting?
16. Condition 4.5- How will Type 3 feedstocks be received? How will the liquids associated with this type of feedstock be addressed to minimize odor, such as milk? This should be specified in the permit. Will trucks be unloaded over a containment pit with a drain? Other states report that liquids from putrescible materials are one of the more messy aspects of Type 3 feedstocks. There should be more conditions in the permit itself to deal with these materials.

17. Condition 4.3- Operations Plan- What is the timeframe for Grimm's to submit? Why is there no deadline?
18. Condition 4.7- Odor Minimization Plan- Why is there no timeframe for Grimm's to submit? How long could they drag out the approval process for this plan? What is the timeframe for DEQ approval?
19. Condition 4.8- Plan Maintenance- Grimm's should be required semi-annually to certify to DEQ that they are still operating in compliance with their current plan. Why is there no compliance certification process as there are with other DEQ permits?
20. Condition 8.1 Mid-term review- some of the things on this list, such as changes in operation of the facility should be dealt with when needed. The mid-term is at 5 years. If the facility has operated without updating its Operations plan and it isn't discovered until the mid-term, that should be cause for enforcement.
21. Condition 9.14- All trucks hauling putrescible waste should be leak tight so malodorous material (such as liquid) is not left on streets as they approach the facility.

From: [Margaret Federspiel](#)
To: [STEVENS Marc](#)
Subject: Grimm's Permit!
Date: Friday, July 31, 2015 3:12:04 PM

It has come to my attention that our neighbors in Pony Ridge and Angel Haven are being devastated by the terrible odor and air pollution coming from Grimm's. Children are getting sick. You can help! I understand that there are a number of problems with the current draft. Here are several that should be considered before allowing Grimm's permit.

Type-3 feedstocks should not be allowed.

The composting pile height should be restricted.

Air quality should be monitored.

Human health assessment should be performed and published.

Wind screens should be required to reduce dust blow-off.

The Operations plans should be submitted before the permit is issued, not after.

10 years is too long for a permit. It should be 5 years or less.

Everyone has the right to enjoy fresh Oregon air! Please do what you can to make sure that this is a right is not a privilege!

Margaret Federspiel

Brett Hamilton
11430 SW Kalispell Street
Tualatin OR 97062

31 July 2015

DEQ Solid Waste Permit Coordinator
700 NE Multnomah St., Suite 600
Portland, OR 97232-4100

Re: Grimm's Fuel Proposed Composting Permit

Dear DEQ:

Thank you for extending the public comments period on this matter. There are a number of deficiencies in the current draft permit that DEQ must address before this permit is allowed to issue:

Type 3 Food Stocks

The current composting operation at Grimm's is causing significant, frequent, off-site odor impacts from the composting of Type 1 and Type 2 feedstocks only. The Inclusion of Type 3 feedstocks would be a change to their operation. There is no justification, support, or rationale for this change in permitted activity. Additional feedstocks should NOT be allowed, piloted, or anticipated until the off-site impacts from the current feedstocks are proven to be under control and within performance standards. **What is the rationale for adding Type 3 feedstocks to the permit language?**

Pile Height

In order to keep solid waste material within the confines of the property, it is essential that the top of the piles be kept out of the wind stream. Because wind direction and wind speed cannot be controlled, DEQ should require that wind screening be placed on all sides of the property. To be effective, wind screens must be taller than the compost piles. Any part of a compost pile that extends above the wind screening is subject to being caught in the wind and having material carried off the property by the winds.

The top of the conveyor system should NEVER be allowed to extend above the top of the windscreen. Particle losses from the conveyor system are currently visible and significant. It is crucial for human health and safety that particles be kept on the property. The conveyor system must be kept out of the wind stream. **How can dust be contained if the pile height is unlimited?**

Monitoring

If the maximum length of commercially available monitoring equipment is 72", then compost piles should be sized so that ALL areas of the pile can be accessed with a 72" probe. Otherwise, there will be areas of the pile that cannot be tested and monitored. **Why does the permit specify a specific length of probe? How is it possible to accurately measure conditions in the center of the pile if the probe cannot reach the center of the pile?**

Permit Length

Considering Grimm's difficulty in managing their current offsite odor, dust, and air pollution impacts, I believe that ten years is too long for the new permit. **I ask that the permit length be five years or less.**

Human Health

Considering the health impacts on children and the elderly from pathogens, allergens, and other pollutants, the DEQ should be protecting these sensitive populations. **Does the DEQ understand how close these populations are to the Grimm's Composting Operation?**

Has the DEQ consulted a map that includes all of the following locations?

- Cedar Crest Alzheimer's Special Care Center
- Prestige Riverwood Senior and Assisted Living
- Angel Haven Mobile Home Park
- Pony Ridge Neighborhood
- Grimm's Fuel Co. Composting Operation

There are at least four health-sensitive sites located across the highway from the Grimm's facility. Based on the proximity of these sites to composting operation, DEQ should mandate continuous, quantitative, scientific air quality monitoring at these sites as a condition of the composting permit.

Has DEQ done a human health assessment that takes these populations into consideration?

How does the proposed permit protect human health at these sites?

I hereby request an electronic copy of all human health assessments that the DEQ has considered, consulted, or performed in relation to the Grimm's composting operation.

If a human health assessment or study has not been performed, then I request that DEQ perform a human health study to look into the health impacts of the Grimm's site on the nearby community.

Quality of Life

Grimm's malodor problem extends at least one mile in all directions from their facility. That totals an area of at least 3 SQUARE MILES miles. This is a massive impact, and it sheds some light on the quantity of pollution that is leaving their property. I would encourage DEQ to protect the environment, human health, business, and quality of life in this area. Grimm's should not profit from the suffering of others. This composting operation is causing health problems close by and economic impacts more than a mile away. It is time that DEQ take this matter seriously.

Sincerely,

Brett Hamilton
Phone: 503-803-7609

From: [Catherine Holland](#)
To: [STEVENS Marc](#)
Subject: Grimm's Fuel Application
Date: Friday, July 31, 2015 11:15:06 AM

Dear Mr. Stevens -

I am writing to let you know of our opposition to granting a Type-3 feedstock to Grimm's fuel. With their current allowed uses, they are already a bad neighbor to our very large neighborhood in North Tualatin.

You need to do the right thing - deny this expansion. If you lived here, you would oppose it as well. Grimm's odors are at times unbearable. Type-3 feedstock would make a bad situation even worst.

It is hard for us to believe that the DEQ would allow this damaging action to our home values. Don't do it.

Cathy Holland
10740 SW Lucas Dr.
Tualatin, OR 97062

To: DEQ
From: Mahvash Saedi a Pony Ridge resident in Tualatin
Re: Grimm's Fuel Co. New permit

It is true that Grimm's has been here for the past 30 years or so. But, world has changed, Oregon has changed, Tualatin has changed ever since. technology was different and was adequate only for that era. Since then, manufacturing companies have advanced their production techniques, which have positively impacted the environment, safety of employees and the mass population. Companies are taking advantage of new inventions and new ideas every day. Regretfully, Grimm's is far behind the current technology and is harming people especially children and elderly living at nearby communities by being stuck in 60's technology.

Grimm's needs to modernize it's production technique and not to stubbornly refuses to change.

Seemingly, Grimm's is only concern about its own profit. Of course, it costs money, **what about people's health and their quality of life?** We know that there was much less homes or businesses surrounding the facility 30 years ago and the compost volume was a fraction of what it is now, but Grimm's is currently located at the middle of an sprawling urban area where the construction of apartments and businesses are expanding.

Frequent noxious compost odor, must be confined to the Grimm's property boundary per DEQ rules. Mushrooms mulch production must be stop or completely contained. **Is DEQ capable of enforcing its own rules regarding malodorous compost odor outside its boundary and the air safety? Is Grimm's willing to consider a decent quality of life for its neighbors?**

Sent via E-mail
mahvashaedi@hotmail.com

From: [Chuck Snyder](#)
To: [STEVENS Marc](#)
Subject: Grimms
Date: Friday, July 31, 2015 2:53:03 PM

Our neighbors in Pony Ridge and Angel Haven are being devastated by the terrible odor and air pollution coming from Grimm's.

I guess I only have one question, was Grimm's there before they bought the house? ? and if so, why are they griping about something that existed way before they bought their house. Why should Grimm's need to spend thousands of dollars to upgrade their systems to satisfy these people. If they are really concerned about it, sell the house, or pay to have the testing and upgrades they are requesting.

--

Chuck Snyder
www.woodchuck.com

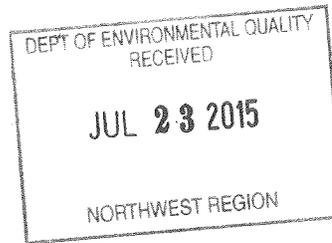
From: [Sue Wallace](#)
To: [STEVENS Marc](#)
Cc: [STEVENS Marc](#)
Subject: Re: Grimms
Date: Friday, July 31, 2015 5:10:28 PM

Sent from my iPhone

- > On Jul 31, 2015, at 1:00 PM, Sue Wallace <scwallace5@yahoo.com> wrote:
- >
- >
- > I on the road today but I am against Grimms being allowed additional permits beyond what they currently have.
- > I live close by and it is already stinky enough
- > Sue Wallace
- > Tualatin Resident
- > Sent from my iPhone

July 10, 2015

Marc Stevens
Solid Waste Coordinator
DEQ Northwest Region
700 NE Multnomah Street, Suite 600
Portland, Oregon 97201



Re: Grimm's Fuel Composting Permit

Dear Mr. Stevens,

I was not planning to testify on the above referenced permit but after the July 8, 2015 public hearing I could not resist. I understand that the residences of the Pony Ridge subdivision are upset but the extent to which those people were lying and exaggerating about Grimm's was shocking!

My husband and I live in Tigard just north of that subdivision on the other side of the Tualatin River. We have lived in our home for the past 19 years and we have never been concerned about an occasional odor from Grimm's. In fact, we haven't smelled any odors from their facility in the last 2 or 3 years. I couldn't believe what I was hearing and the extent to which those people were exaggerating to make Grimm's look bad.

My husband works in Tualatin near the corner of Leveton Drive and 130th and he hasn't noticed any odors at that location in several years either. And his work is much closer to Grimm's than Pony Ridge.

We have been to Grimm's recycling center many times to drop off debris and pick up barkdust. While I have noticed some odors at the dumping area, I have never seen anyone vomiting or becoming violently ill because of the smell. We have a hard time believing that children are vomiting in the streets of Pony Ridge. Our 11-year-old daughter plays outside all of the time with her many friends and she has never even noticed any odor. We also have a hard time believing that Grimm's has received "hundreds of odor complaints over the last two years" as the one gentleman testified.

Is there any way to verify these wild claims and does Grimm's have any recourse or defense against the people making them up? It seems so unfair that people can just make things up like that. It's like some modern day witch-hunt. Those people seem to really have it out for Grimm's and I don't understand why. Many of the people who testified don't even live near Grimm's and are not affected by their operation in any way.

We have always found the people at Grimm's to be very nice and helpful. They have great products and provide important recycling services. Therefore, we would like to go on record that we believe there is no basis for many of the current allegations against Grimm's Fuel and we support the renewal of their permit.

Sincerely,

Tiffanie Wheeler, Kevin Wheeler

Kevin and Tiffanie Wheeler
17100 S.W. 131st Ave.
Tigard, Oregon. 97224
cc: Jeff Grimm



GRIMM'S FUEL CO.

DOING BUSINESS SINCE 1929

18850 SW Cipole Rd., Tualatin, OR 97062

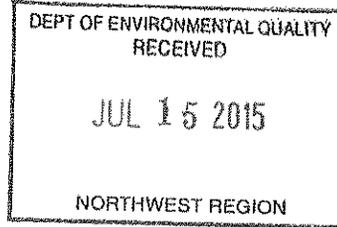
Barkdust
Garden Mulch
Mushroom Compost
Blended Soil
Decorative Rocks

Phone 503-636-3623

503-692-3756

Fax 503-692-2015

July 12, 2015



Marc Stevens
Solid Waste Coordinator
DEQ Northwest Region
700 NE Multnomah Street, Suite 600
Portland, Oregon 97201

Re: Grimm's Fuel Composting Permit

Dear Mr. Stevens,

Attached are 864 signatures from people who are supporting the renewal of our composting permit. I would like to submit these for the record as part of the public comment process.

Thanks,

Jeff Grimm
Grimm's Fuel Company

1

We support Grimm's Fuel Company's recycling operation and the renewal of their composting permit.

- | Name | Address | Phone |
|-----------------------|---|----------------|
| 1. Ed [unclear] | Shelwood
N.E.S.D.R.
17677 SW | 503-899-8547 |
| 2. [unclear] | 17465 SW Melr, Shelwood | (503) 522-4082 |
| 3. [unclear] | | |
| 4. [unclear] | | |
| 5. Fred [unclear] | 3 | |
| 6. [unclear] | | |
| 7. [unclear] | | |
| 8. [unclear] | | |
| 9. [unclear] | | |
| 10. Mary Schoeneman | 10210 S.W Terwilliger P.
Portland | |
| 11. [unclear] | 13750 SW
Whitting way | |
| 12. [unclear] | | |
| 13. CHRIS YAHN | | |
| 14. STEPHEN FRYBAREW | 15415 S.W GLENNEN
BEAVERTON OR 97007 | 503-646-3230 |
| 15. [unclear] | 12572 S LYONS RD
OR, CTY, OR 97045 | |
| 16. MARCO PEREZ | | |
| 17. [unclear] | 20400 BOONBS FERRY | |
| 18. LUTHER VANDERBURG | 17705 SW GALEWOOD DRIVE | 971-563-9333 |

We support Grimm's Fuel Company's recycling operation and the renewal of their composting permit.

Name	Address	Phone
1. Armando Gonzalez		
2. Jaime Perez		
3. Raul	CRICS fuel	
4. Francisco Barrios Jr.		
5. Austreberto Becerra O.		
6. Jose Ramirez		
7. Keni Milner	Palimmo way km	
8. Abel Lenn	7870 W. Mahane	971 205 8949
9. Rafael Lopez		
10. Blank		
11. Hago Saavedra		971 570 2043
12. Jose Miseres		(971) 732-0514
13. Fabian Ramirez		(503) 954-4715
14. Helen S. Wolfe		(503) 307-4901
15. Matthew Miller		503 720 1761
16. Jerry Thomsen		
17. Brett Rockhill		503 593 5295
18. Juan		

We support Grimm's Fuel Company's recycling operation and the renewal of their composting permit.

Name	Address	Phone
1. Michelle Karpinski		
2. Erin		
3. Anne Taylor	17069 SW 21st Road TISALP	816-8797
4. Ralph Durocher	12330 SW Marie Ct Tgnd	503 268 3891
5. John	3535 SW. MILWA. BLVD. BORD.	OR 97219
6. Miguel Lopez		
7. Jose Lopez		
8. Guis		
9. Wilfrido Chavez		
10. Jacobo Keck	204 SW 204 SW	CEVIRE VOT 9700
11. Felipe Alvarado		
12. Felix Gonzalez		
13. Daniel Jansca		
14. Rich Miller	6970 SW Gable Pkwy	Portbur
15. Barbara Lenfesty	6970 SW Gable Pkwy	PDX
16. K. McPherson	23077 SW Main	503 8065316
17. Tammy Blankenship	23077 SW Main St.	503-688-3252
18. Nicolas Martinez	419 SE 4th Ave	Hillsboro 503-522493

We support Grimm's Fuel Company's recycling operation and the renewal of their composting permit.

Name	Address	Phone
1. MICHAEL EMMETT		
2. [Signature]		
3. [Signature]		
4. JCS Lawn Services		
5. [Signature]		
6. [Signature]		
7. pedro martinez S		
8. Brian Brezinski		
9. [Signature]		
10. ERIK RODRIGUEZ		
11. Nemesio Gaspar		
12. James Ree		
13. [Signature]		
14. MFP		
15. [Signature]		
16. [Signature]	6601 SW Oak St Tyand OR 97223	
17. Jose Romero		
18. [Signature]		

We support Grimm's Fuel Company's recycling operation and the renewal of their composting permit.

Name	Address	Phone
1. Dan Livingston	11465 Fanner St Tigard	503 260-6604
2. Amy Drexler		503 809-3863
3. Paul Wisniewski	8215 SW 191 St ALIHA OR	503 705 0076
4. Robert Hernandez		
5. Juan Flores		
6. Esther Vandemic		
7. Andres Acosta		
8. Benjamin Dielman	1313 E 9th Street NEWBERG OR	503-730-1833
9. Matthew Karpman		
10. [Signature]		
11. Doug L.		
12. Fortino Wiza		
13. [Signature]		
14. [Signature]		
15. Michaela Peterson		
16. J Rocau Pymon		(503) 422-2911
17. Luis Rodriguez		
18. James J. Hayes	16685 SW Duham	503-412-9392

We support Grimm's Fuel Company's recycling operation and the renewal of their composting permit.

Name	Address	Phone
1. Seagraves LANDSCAP		
2. Beth Lampert	8817 SW Taylor's Emv Rd.	503-851-8712
3. Jeff Gierman	12790 SW Koppel DOCK CT TIGARD, OR	503 805-7464
4. Ellen Miller	44310 NW EL MOUNT RD	
5. Offices	10820 SW DENNIS BELL CT	972223
6. Gilberto ASULVER		
7. Jose Rivera Avila		
8. Danile Sotm		
9. Nate Johnson		
10. Evan Lange		
11. Ethan Lange		
12. Matt Behtel	8045 SW Mapleleaf St	971-242-5975
13. Daniel TTKam	- 22982 SW HASTOR way storwood	
14. Alan Leneen		
15. Tony Sporn	12885 S.W 132 TIGARD, OR	
16. Jeff LANDSCAP		
17. The Carrels		
18. James Davis	6535 SW Miles CT.	

We support Grimm's Fuel Company's recycling operation and the renewal of their composting permit.

Name	Address	Phone
1. Daniel Satchel		503-740-9638
2. Jim Nusser		503-754-0528
3. Jim Willis		503-590-1021
4. Jesus Marcelo		
5. Paul Hedges		
6. Tom Ryan		
7. Mike Coffey		
8. Kerry Roth	22480 SW 102 nd Trulokin	503 730 8999
9. Kathi Kennedy	5575 Bonita	503-702-8162
10. Joan Edes		
11. Pedro		
12. Stephen Bliestad	13826 SW Stirling Beaverton, OR 97008	503 579-2319
13. Jack Satchel	15164 W GONZALES	225680-6272
14. John Satchel		
15. John Satchel		971 2584755
16. Ray Johnson		520 360 576 8850
17. John Satchel		503 793 6095
18. Cathy O'Brien		503-702-3518

We support Grimm's Fuel Company's recycling operation and the renewal of their composting permit.

Name	Address	Phone
1. <i>[Signature]</i>		
2. <i>[Signature]</i>		
3. <i>[Signature]</i>		
4. <i>[Signature]</i>		
5. <i>[Signature]</i>		
6. <i>Bob Buckley</i>	<i>Sherrard, Pa.</i>	
7. <i>[Signature]</i>		
8. <i>[Signature]</i>		
9. <i>[Signature]</i>		
10. <i>[Signature]</i>		
11. <i>[Signature]</i>		
12. <i>[Signature]</i>		
13. <i>[Signature]</i>		
14. <i>[Signature]</i>		
15. <i>[Signature]</i>		
16. <i>[Signature]</i>		
17. <i>Joseph S. Gohman</i>		
18. <i>[Signature]</i>		

We support Grimm's Fuel Company's recycling operation and the renewal of their composting permit.

Name	Address	Phone
1. Gilberto Zambrano		
2. Phil Broedel	4538 SW Northwood Ave	97239
3. MARIO MORALES		
4. XXXXXXXXXX		
5. XXXXXXXXXX		
6. GONDO MORALES		
7. JESUS E. B.B.		
8. David Hill		
9. Paul Betare	2535 Remington Dr. West Lin	
10. Del Jett	19586 KARI ANN CT.	OR CITY 97045
11. Gordon Tolbert	19586 Kari Ann ct.	O.C. 97045
12. Juan Mendez		
13. Juan		
14. Bill Maist		(503) 697-8444
15. AR Wieter	8409	
16. B, Z, A	Dry Oak INC.	CCB-207040
17. Dennis Janning	14785 SW Peachtree Trl	OR
18. Jo Ann Janning	14485 SW Peachtree Dr	OR

We support Grimm's Fuel Company's recycling operation and the renewal of their composting permit.

Name	Address	Phone
1. Dino Ostrow	12215 SW James St. Tigard OR	503 939-9222
2. CARL SCHOCK	6805 SW VENTURA, TIGARD, OR	97223
3. Dan Paldino	13805 SW 163 rd PL Tigard, OR	97223 503-320-4855
4. Laura Collier	9375 SW Garden Home Rd	Portland OR 97223
5. Clayton Bann	10860 SW FAIRHAVEN S.	TIGARD, OR 97223
6. Dan Scrambling	9682 SW WHISPERING FR	BEAR CREEK OR 97007
7. David Olson	11800 SW Robb Dr	Bear Creek OR 97008
8. JEFFERY ROBERTS	15055 SW ROYALTY PARKWAY G-27	TIGARD OR 97224
9. Basilio Ceonac	10010 S.W. Conestoga	Beaverfoot.
10. RT Lake Tuerge	6350 SW Allen	Beaverfoot, OR 97008
11. William Hill	15284 SW GREENFIELD DR	97224
12. Paul Bria	7575 SW Becky Ct	Aloha OR 97007
13. Seth Brandt	9320 SW Amara St.	Tigard, OR 97223
14. Jeff Bock		
15. [Signature]	1065 SW Edgewood St	PDX
16. [Signature]	PO BOX 3102	TUALATIN OR 97062
17. [Signature]	25404 SW McCONNELL	STERLINGWOOD OR
18. [Signature]	19355 SW 65th Ave	Tualatin OR 97062

U

We support Grimm's Fuel Company's recycling operation and the renewal of their composting permit.

Name	Address	Phone
1. Jesus Valdez	769 Joel Palmer Way Dayton OH 97114	503 935 2453
2. CHARLES ZIMMERMAN	20833 SW LADD HILL ROAD WILSONVILLE, OR 97070	503 317-9365
3. John Behrends	12128 SW 60 th Portland OR	503 449 8195
4. FRANCISCO J. VILEGAS	19492 SW 67 th AVE TUALATIN OR	503 840-4477
5. Vello A. Koiv	198448 SW Heights View Dr. FAI, OR ⁹⁷⁰⁰⁷	503 524 397
6. Adrian Pochandy	19114 SW 27 th A. Portland, OR	97219 505-229-4006
7. Shanaa Pepper	45338 SW Squires Rd Gaston OR	97119 503-992-0929
8. MICHAEL COX	10840 SW FALCON CT Beaverton OR	415. 623. 8548
9. BRUCE McKinnon	13235 SW GENESIS LP Tigard, OR	97223
10. Phillip F. SNEED	7111 SW London Tigard, OR	97223
11. Steve Bost	10430 SW View Terrace Tigard Or.	97224
12. Greg Garrison	8943 SW 25 th Ave FAI OR	97211
13. Marita Ramirez	1206 James St Woodburn OR	97071
14. Laila Hajoo	15967 SW Enna Ct Tigard OR	97224
15. Paul Pajal	11925 SW Bull Mt. Rd, Tigard OR	97225
16. R.L. Thomas	14240 SW 150 th Tigard OR	97224
17. Greg Harris	15279 SW Cabernet Tigard OR	97224
18. Old Forge	15279 SW Cabernet Dr, Tigard, OR	97224

We support Grimm's Fuel Company's recycling operation and the renewal of their composting permit.

Name	Address	Phone
1. LEX	TIGARD	503-810-2752
2. DAVID	NEWBERG	971-217-2132
3. BOB	BEVERLYN	503 752 0193
4. WILMA	Sherwood	503-319-5494
5. DEBRA	Sherwood	503-515-7044
6. Theodor King	Portland	503-244-0771
7. Susan King	Portland	503-244-0771
8. [Signature]	Subic	503-990-6135
9. Fernon	DIST	
10. Edman Nivarsis		
11. Judy Lewis		
12. [Signature]	Portland	503-293-6567
13. [Signature]	Portland	503 977 1513
14. [Signature]	(Ocean) 1245 SW Yewling	503-349-2426
15. [Signature]	10980 SW 102nd	503-620-2024
16. [Signature]	15700 SW 3rd	978-5490
17. [Signature]	11400 120th SW Clifton	(503) 853 3297
18. [Signature]	Tigard	503 420 4408

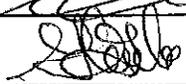
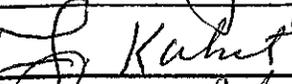
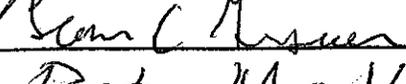
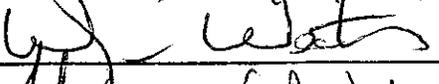
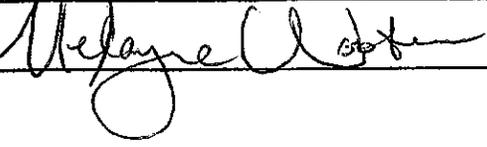
We support Grimm's Fuel Company's recycling operation and the renewal of their composting permit.

Name	Address	Phone
1. Felix Ramon		
2. [Signature]		
3. Arnulfo Ramirez		
4. Oscar Ramirez		
5. Gerardo Reyes		503-984-2328
6. Angel Barajas		
7. Debbie Zambrano		
8. John Zambrano		
9. M & B Cleaning Co		503-206-2968
10. Bob Hansen		503-729-8038
11. [Signature]		503-784-2727
12. [Signature]		503-246-1201
13. [Signature]		503-246-1201
14. [Signature]		578-301-9088
15. [Signature]		
16. [Signature]		
17. [Signature]		503-701-7955
18. [Signature]		

We support Grimm's Fuel Company's recycling operation and the renewal of their composting permit.

Name	Address	Phone
1. Abel Arias		
2. Pat Leizer	Leizer Ln	707-0822
3. Rick J. J. J.	1755 SW SHAWNEE TULSTIN	503-226-4562
4. Luis Alvarado		
5. Alex Jandro-s		
6. Mark Fieldhouse	9285 SW Inez St.	503-686-8569
7. Douglas Pineda	6597 SW 19 th Ave	Alaha OR 503 804-5958
8. Steve Hill	12486 SW GARDHAMLAN	BEAR OR 971-222-963
9. Rebecca Edrill		(503) 740-9097
10. Roberto Hernandez		(971) 340 6663
11. Joe Emery		503-684-2658
12. Robert Mark		971-404-1849
13. Angel Landscape		
14. CA COZARES, Landscape		
15. Gabriel Cozares, Land Care		
16. INNOVATIVE LANDSCAPING		
17. C.W. WAINWRIGHT	Forest OR	503 293-7627
18. Tomi Agostini	Forest OR	503-804-0605

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Name	Address	Phone
1. Paul Burrell	Rd Bunn	
2. Martha Burrell	Martha Burrell	
3. Jeff McKenzie		
4. Abel Cevallos		
5. Jesus Lopez		
6. 		503 869-3563
7. 		
8. 		
9. 		503-887-2507
10. Christina Blom		
11. Paul O. Zantz		503-625-1665
12. Christoph. Zantman		" "
13. 		503 466-7761
14. 		503-620-9474
15. 		503-539-8983
16. Pete McHett		503-406-6826
17. 		503 593 4668
18. 		503-421-2264

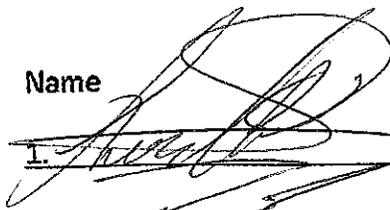
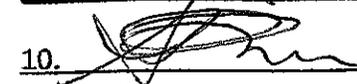
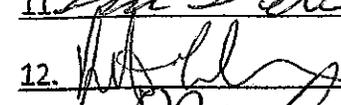
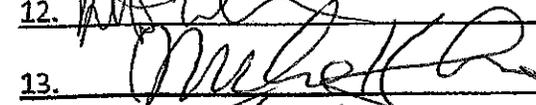
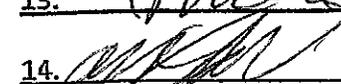
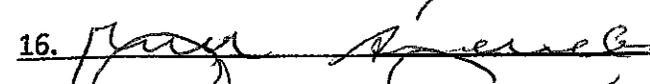
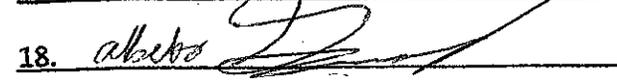
We support Grimm's Fuel Company's recycling operation and the renewal of their composting permit.

Name	Address	Phone
1. Joe Acuna		
2. Eliel Bernal		
3. [Signature]		
4. Rigo BERTO R.		
5. Marcial Garcia		
6. T. Suel Trujillo		
7. Paul Longo		
8. [Signature]		505 201 8053
9. [Signature]		
10. [Signature]		
11. [Signature]		
12. Evergreen Landcare		
13. Pedro Domazano		
14. Justus Poling		
15. Felix Gonzalez Landscaping		
16. Nival morero		
17. [Signature]		
18. Gabe Hobson		

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Name	Address	Phone
1. Ryan Robinson	12400 Creekside Pl Tigard, 97223	503-907-1495
2. Kennedy	11674 SW Homestead Ave A77 B3	
3. Osvaldo Ramirez	11674 SW Homestead Ave A77 B3	503-330-7859
4. Mr. Ramirez Zarda		503-608-9673
5. Jonathan Gardner	7725 SW 182nd Pl	503-290-8267
6. Ladislav Gonzalez Deniz	8325 SW Mohawk St	503-330-1531
7. Ladislav Gonzalez Ch	8325 SW Mohawk St	503-516-6468
8. Erik Kolberg	2480 SW Crestdale Dr	503-819-2261
9. Timothy Kolberg		
10. Willy Willis	39667 Pabarko callne	503-668-6181
11. James Franco	11801 SE 352nd Ave	971-221-6512
12. Jordan Pallen	38537 SE Smith Rd	503-577-3735
13. JAY Miller	12420 SW Barry Hill Ln Beav	503-707-4725
14. ARMANDO GULLER		
15. MARCO Ch...		
16. DENNIS BEARDT	2378 North Holly Canyon Dr	503-709-3064
17. JEFF BERCOOT	10360 SW DAVIES RD BUTM	503-380-7945
18. Mario Diaz B.		

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Name	Address	Phone
1. 		
2. 		
3. 		
4. Rosellina K		
5. Jose Luis Correa		
6. 		
7. 		
8. Dan B. Juni		
9. 		503-707-7474
10. 		
11. Tom Decker		
12. 		
13. 		
14. 		503-569-8782
15. Jesus Ayala		
16. 		
17. 		
18. Alberto 		

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Name	Address	Phone
1. Andy Erickson	Portland	643-3889
2. Janine Kauris	Portland	503-293-5901
3. Gerardo marks S'		503 453 6244
4. Marcia Z Garcia		(503) 901-4402
5. Valentin Mendez G.		503 516 9469
6. Miguel FLORES		503 407 1103
7. Luis	Terra	502 992 0267
8. John		503-954-0755
9. John Nard		(503) 740-2615
10. John		503 419-7000
11. John Mark		503-977-1867
12. Fernando		(503) 544 0113
13. John		503 330 3147
14. Adolfo Gonzalez		
15. Daniel Gonzalez G.		
16. Ralyn Rohn		503 746 4861
17. Ralyn Rohn		
18. Ralyn		503 327-5715

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Name	Address	Phone
1. Gustavo Perez		503 734 6065
2. Desantis		503 425 5911
3. Andy Gifford		503 929-2224
4. Richard Munoz		503-919-1231
5. Jacobus		503-971-8939
6. Jim		
7. PAUL DAVIS		503-452-9545
8. Domingo Diaz		971-226-2702
9. Daniel Ramirez Ochoa		
10. Travis Barron		
11. Jedelato		
12. Jose J Gomez		
13. Saul Bazonia		503 388-14-10
14. Zack VanBrunt		503-798-3622
15. Greg Furman		503. 707.6717
16. Martin Abad Hernandez		
17. NOEL SAMANIEGA.		503-932-9729.
18. Victor mendoza		360 324 9950

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Name	Address	Phone
1. Chason	Richardson	
2. Amin	Milani	
3. Pancho	Pantera	
4. Yurona T	PA	
5. Javier	Baltazar	
6. Thit	Lemus	
7. Pedro	garcia	
8. W	PA	
9. PA	PA	
10. Alvaro	garcia	
11. Alvaro	PA	
12. Alvaro	PA	
13. Alvaro	Flors Amis	507 370 918
14. Raul	perez zamudio	
15. 		
16. Bruce	Jenkins	
17. Iván	Herrera	
18. Adalberto	Garcia	

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Name	Address	Phone
1. Humberto Bell		
2. Victor Herrera		
3. Susie Fernandez		
4. Miguel Monroy Hdez		971 235 5960
5. Ramiro Gomez	Asuiar	
6. Matt Pacion		
7. Nathan Francis		
8. Tranquilina Cruz		
9. Saul Martinez		
10. Rogue		
11. Cesar Gomez		
12. Eduardo Romero		
13. Jorge Luis Arias		
14. Juan Angeles Sanchez		
15. Arthur Garza		
16. Dan Cadan		
17. PAH CIDRANU		
18. LEP		

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Name	Address	Phone
1. B.D. Di		
2. JORSE PUN		
3. Cesar Romero		
4. Benito Jimenez		
5. Jose Leyva		
6. Luis Cadillos		
7. Jose Riera		
8. Gerardo Piedra Gonzalez		
9. Pedro Rio Pedro		
10. JOSE BARRO		
11. Arturo Ayala S.		
12. Jorge		
13. Alfredo		
14. Fabian		
15. Walter Ecomac		
16. Angel Mendez		
17. Angel Mendez JR		
18. John Rodriguez		

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Name	Address	Phone
1. Martin D.	3101 W.	541-741-6200
2. Martin M		503-729-1115
3. Jose Castillo	AS	503-810-7509
4. Max		503-692-6909
5. Max Post	7007 SW Pine	503-522-4933
6. Post	7007 SW Pine St	971-998-0138
7. Victor Pamban	11750 SW 9th	503-616-1644
8. Jose L. Gonzalez		
9. Tim Oden		503 297 1130
10. Sidero Chaves		
11. Roberto Escalona		
12. [unclear]		
13. [unclear]		(503) 560-2368
14. Yaphu Flores		(971) 407 8219
15. [unclear]		(503) 553-9264
16. Salvador Delgado		(503) 319-3824
17. Jose Casares		
18. Douglas E. Muench	Wilsonville	503-387-7551

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Name	Address	Phone
1. <i>Edmund Carr</i>	<i>1510 SW Grand St. Steward</i>	<i>503-686-1883</i>
2. <i>[Signature]</i>	<i>11570 SW 11 St.</i>	<i>503-740-22-07</i>
3. <i>[Signature]</i>		
4. <i>Karl Santos</i>		
5. <i>Fran Rivera</i>		<i>503-757-8592</i>
6. <i>[Signature]</i>		
7. <i>[Signature]</i>	<i>97219</i>	<i>503-724-1830</i>
8. <i>Duane C. Peterson</i>	<i>11010 SW Summer Lake Dr. Tigard</i>	<i>503-816-8574</i>
9. <i>Marty Peterson</i>		
10. <i>[Signature]</i>		
11. <i>Albosta Nina</i>		
12. <i>[Signature]</i>		
13. <i>[Signature]</i>		<i>(503) 459-9786</i>
14. <i>[Signature]</i>		<i>971 832 8345</i>
15. <i>Mei Barre</i>		<i>509 758 6164</i>
16. <i>Fild Burrow-Boyle</i>		<i>(503) 746-3253</i>
17. <i>Francisco C. Soto</i>		<i>(209) 890 9303</i>
18. <i>Ryan Taylor</i>		

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Name	Address	Phone
1. <i>[Signature]</i>		
2. <i>[Signature]</i>		
3. <i>Mel M. [Signature]</i>	10950 SW 10th	503-620-3034
4. <i>Dustin [Signature]</i>	6975	
5. Julie Walker	9835 SW Inez St Tigard	503-443-6055
6. David Lucas	20785 SW Kinnaman	503-765-0838
7. <i>[Signature]</i>		
8. <i>[Signature]</i>	10620 SW 95th	310-918-4845
9. <i>[Signature]</i>		888-721-1450
10. <i>[Signature]</i>	2240 SW [Signature]	503-597-1100
11. <i>[Signature]</i>		
12. <i>[Signature]</i>		
13. <i>[Signature]</i>		
14. <i>[Signature]</i>		(503) 730-0652
15. <i>[Signature]</i>		(503) -989-1868
16. <i>[Signature]</i>		
17. <i>[Signature]</i>		
18. <i>[Signature]</i>		

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Name	Address	Phone
1. <i>Layne Hamilton</i>		
2. <i>Mac Cosby</i>		
3. <i>Riccardo Chiri</i>		
4. <i>Aden Cosby</i>		
5. _____		
6. <i>Don Ford</i>		
7. <i>John Ford</i>		
8. <i>Alex G</i>		
9. _____		
10. <i>Chris Voth</i>		
11. <i>Antonio Souda</i>		
12. _____		
13. _____		
14. <i>JUAN</i>		
15. <i>gigigianer</i>		
16. <i>Robert Jugo</i>		9712120167
17. <i>John L. Watters</i>		
18. <i>John L. Watters</i>		

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Name	Address	Phone
1. Pablo Pacheco		
2. Rafael Pacheco		
3. Erin Rodriguez		503 913-8850
4. Silvio Alvarez		971 2120629
5. Juan Esteban		503 2140404
6. Jose Jose Lopez		
7. Erin		
8. Dan Boehr		
9. Sean Kimsey		
10. David Hay		503 625 3546
11. Christine Christine Bischoff		503 449 3769
12. Juan		971-888-1088
13. Blair		
14. Hugo Tapia C.		
15. John Q. Berger		503-686-8137
16. Sam Sam Myrland		503-786-0349
17. Jose C. Zavala		
18. Albano Rosales E		

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Name	Address	Phone
1. Mark Hickman	(990)	
2. Tor Lynshaw	7440 SW 34 Ave	postpaid
3. Harrold Hildego	B. Hildego	Post Office
4. Michael L. Kline	23742 SW Pine	Sherwood
5. Michael D. Reich	16910 SW Steel Way	Beaverton OR
6. Jim Willis	15285 SW Bull Mountain Rd	Tigard OR 97224
7. Marti Willis	15285 SW Bull Mountain Rd	Tigard OR 97224
8. Ven Stone	7659 SW Landay St	Clatsop
9. Francesco Kerner		
10. Jozsef J. J. J.		
11. Kelly Keith		
12. Rex Hemlock		
13. Mark Rucker		
14. Dolly		
15. EBM		
16. Jess Ang		
17. J. O. R.		
18. Nancy		

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Name	Address	Phone
1. <i>[Signature]</i>		
2. <i>Bonman Solis</i>		
3. <i>Colin Hester</i>		
4. <i>[Signature]</i>		
5. <i>E. H. N</i>		
6. <i>[Signature]</i>		
7. <i>[Signature]</i>		
8. <i>Noel</i>		
9. <i>[Signature]</i>		
10. <i>Roberto</i>		
11. <i>[Signature]</i>		
12. <i>[Signature]</i>		
13. <i>Pablo Hernandez</i>		
14. <i>[Signature]</i>		
15. <i>[Signature]</i>		
16. <i>[Signature]</i>		
17. <i>[Signature]</i>		
18. <i>[Signature]</i>		

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Name	Address	Phone
1. RAMIREZ	LOPEZ	
2. Adria	Castillo	
3. Robert Snygo		
4. [Signature]		
5. [Signature]		
6. Fernando	Picil	
7. [Signature]		
8. RAI	TZEC	
9. [Signature]		
10. [Signature]		
11. Luis	Samino	
12. [Signature]		
13. NICOLA A	GUTIERREZ	
14. Luis E.	Samirer	
15. Luis E.	Chavez	
16. [Signature]		
17. JAIME	SANCHEZ	
18. Jesus	Witzes	

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Name	Address	Phone
1. Jim Baker	4100 SW POMONA ST PORTLAND, OR 97219	503 244 6051
2. Kevin	2400 SE 22 nd AVE OR	503-386-3377
3. Timothy Heleon	18299 SE Rachael Dr Sandy OR 97055	971-221-5772
4. Jeramiah Grant	3806 4 th SAUSCEY ST	503 875 8271
5. Paul		
6. Mark	2235 SW 194 th AVE BEAVERTON 97003	503-348-4371
7. Fernando P. M.		
8. Jesus P. V.		
9. Gemen M. P.		
10. [Signature]	2985 SE COLLEGE	
11. [Signature]		
12. [Signature]		
13. [Signature]	10609 NE 19 th Ave	
14. [Signature]		
15. [Signature]		
16. [Signature]		
17. [Signature]		
18. [Signature]		

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Name Address Phone

- 1. Jason Kelly
- 2. Miguel Alvarado
- 3. [Signature]
- 4. Juan Inzunza
- 5. Maria Sweet
- 6. [Signature]
- 7. Jesus Bonis
- 8. Miguel Ferrer
- 9. [Signature]
- 10. Salvador Escoto
- 11. Fernando Parra
- 12. [Signature]
- 13. William Duban
- 14. Tony Curtis
- 15. Dan Johnson
- 16. [Signature]
- 17. [Signature]
- 18. Roberto Salcedo

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Name	Address	Phone
1. Marcelino M. P.		
2. Mauro		
3. Mauricio Hurtado		
4. Rodrigo		
5. Ricardo Bazante		971-344-8254
6. ...		
7. ...		
8. ...		
9. ...		
10. ...		
11. ...		503-840-7796
12. Juan Carlos Landeros		
13. ...		
14. Gilberto Aguilar		
15. Jose Rivera Avila		736-6504
16. Christopher Vasquez		503-73-4-1
17. ...		
18. ...		

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Name	Address	Phone
1. Lazaro Herrera		
2. Rogelio Coronel		
3. Armando Garcia		
4. Lisa Perez		
5. RICARDO L. PACHE	8120 SW BIRCHWOOD	503-444-0842
6. <i>[Signature]</i>		
7. Daniel Santaella		
8. Gustavo Santaella		
9. Art Jim		503-625-1348
10. Jeff Gibbs	13640 SW HALEM DE PEPPER	
11. Brad A		
12. Devo	11255 SW Greenburg Rd	
13. Araceli	11255 SW Greenburg Rd	
14. Robert Hays	9465 SW Martha St Tigard	
15. Sabrina Hays	9465 SW Martha St Tigard	
16. Aaron Jensen	14783 SW 109th Ave #12 Tigard	
17. <i>[Signature]</i>		503 9360296
18. Mauricio Acosta		

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Name	Address	Phone
1. <i>[Signature]</i>		
2. Cash Fossey		
3. Arturo Tenerez <i>[Signature]</i>		
4. Felipe Gonzalez		
5. Noah Samuel		
6. Ricardo <i>[Signature]</i>		
7. Ray (Lemon)		
8. <i>[Signature]</i>		
9. D. <i>[Signature]</i>		
10. Gilberto Aguilar Jr		
11. <i>[Signature]</i>		
12. Ferencio Cortez		
13. ALFONSO MENDEZ		
14. Benjamin Aguilar		
15. <i>[Signature]</i>		
16. <i>[Signature]</i>		
17. <i>[Signature]</i>		
18. Ramon Gomez		

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Name	Address	Phone
1. Martha Cox		
2. Jean A. Winchester		
3. Dem		503 885 5391
4. [Signature]		
5. [Signature]		503 499-0248
6. [Signature]		503 495-1613
7. [Signature]		
8. Benicio A.		(503) 544-9388
9. UNCLER ARMAN JR.		
10. Marcos Arraola		503-219-9970
11. [Signature]		503-403-9715
12. Brian Cook		
13. Teodoro Bautista		971 219 9354
14. [Signature]		971-216-2564
15. Juan Carrada		503-869-1266
16. Francisco Carrada		(503) 422-0282
17. [Signature]		
18. Henry Carr		503 869-6906

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Name	Address	Phone
1. Miguel L...		503-970-1417
2. [Signature]		
3. CHARLIE WILLIAMS		
4. Esperidion Gonzalez		971-388-1867
5. Adelina Gonzalez		971-388-6423
6. Roy Storchung		503 636 6611
7. Stephanie Storchung		503 636-6611
8. [Signature]		503 944-1177
9. [Signature]		503 484-9076
10. [Signature]		503-307-1247
11. [Signature]		503-705-9964
12. [Signature]		503 319-7714
13. Tom Johnson		503-260-8396
14. Strat Ferguson		503 810 0637
15. Mary Chamseddin		503 939 6878
16. [Signature]		
17. [Signature]		503 625 6659
18. [Signature]		206 201 4129

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Name	Address	Phone
1. Donald Matson	9540 SW Killaway	503-692-3917
2. Connor Scott	21505 SW Cayuse Court	503-550-9224
3. McKinley Ewing	9531 SW Singlaw Ln	503-691-2301
4. Kenny Schneider	7226 NE Vancouver Way	360-521-7149
5. Harsh Kumar	7226 NE Vancouver Way	360-980-7442
6. Charles Ford		
7. Charles J		
8. Bob Clark	11240 SW Arboret	503 639 6267
9. Debbie Clulley	11240 SW Arbore Ct	503 639 6267
10. V. Fox Snee	1908 SW Milos SL #215	503-318-1110
11. Bob Ibsios		503 870 4881
12. Jose Villanua		503 327 1864
13. Remiro Cruz		503 871-2332
14. Antonio Cruz Martinez		503 679 6839.
15. Linda McEhee		50
16. J. J. Kent		503-453-0205
17. Bryan W. Ford		503 679 9143
18. David York		971-295-9878

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Name	Address	Phone
1. Jeff Stephens		
2. Israel Stephens		
3. Mark Nydigger		
4. Jim Marion		
5. Michael Higley		
6. Vincent Hollingsworth		
7. Lynn Country		
8. Geriann Courtney		
9. Don Carlos Hernandez		
10. Jesus Gonzalez LandCAPE		
11. Olga Mendez Sanchez		
12. Jorge Iz		
13. Jose Cruz		
14. [Signature]		
15. [Signature]		
16. [Signature]		
17. [Signature]		
18. [Signature]		

We support Grimm's Fuel Company's recycling operation and the renewal of their composting permit.

Name	Address	Phone
1. Shawn Kelly	Keizer	
2. Harry Monteroso		
3. CHRISTIAN CASTILLO		
4. MARVIN Rudy ZACARIAS		
5. Andrea Linares	Lake Oswego, OR	
6. Muhammad	Lake Oswego OR	
7. King Garcia	5920 SW Taralynn Ave	971-227-6929.
8. Victorland Tosej		
9.		
10. Matt Mushbun	stayton OR	
11. Mark Jensen	Beaverton OR	
12. Jeff Ames	Portland OR	
13. Bryant Paine	Fort Bragg, CA	
14. Angel's Maintenance		
15. Gary Rogers	King City OR	
16. Brandon classert		
17. [Signature]	Tigard, OR	
18. [Signature]	Tigard, OR	

We support Grimm's Fuel Company's recycling operation and the renewal of their composting permit.

Name	Address	Phone
1. KELVEN STAVEN	SHERWOOD	503-539-4511
2. Mike Stranbury	Tualatin	503 679 1657
3. James D Fowler	Tigard	503 6205168
4. Maria Fowler	Tigard	503-622-5768
5. Virgilio Barrantos		
6. Ed		
7. Todd Schuff	Loveburg	
8. Juan Leos	woodburn	(503) 984-0305
9. RYAN TOYE	DURHAM	503-944-9334
10. Jose Hernandez		503 504 9102
11. Ed Schurr	Tigard	971-221-4776
12. Jim Eden	TIGARD	503 624-7093
13. Tim Alus		503 784-6829
14. ERIC JOHNSON	19120 SW Steeplechase	97008 503-524-2673
15. Santos Sanchez	Tigard OR	503-330-8008
16. David Matecki	Tigard OR	503-349-7631
17. Ernesto Chanoaca		(503) 490-9162
18. Ernesto C. G.		(503) 348-2752

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Name	Address	Phone
1. Oscar Legu Mora		
2. Andres Remigio Santos		
3. Salvador Lopez Lopez		
4. Monty Duran		
5. Juan Bravo S		
6. Pablo Vasquez V		
7. Jose Canchola		
8. Juan Heiler		
9. [Signature]		
10. [Signature]		
11. Thomas Gaudin		
12. Scott		
13. [Signature]		
14. [Signature]		
15. Benjamin		
16. Billy P. [Signature]		
17. [Signature]	Hien Le	
18. SERGIO ROSAS F		

We support Grimm's Fuel Company's recycling operation and the renewal of their composting permit.

Name	Address	Phone
1. Brandon Taylor	17341 S Boeckman RD	503-830-7653
2. Jose Avila	22665 SW Cochran DR	503-476-5785
3. Cristobal Villega	18755 SW TH ^{#617} 9 Tualatin OR	
4. Jose Hernandez Woodward		
5. Leopoldo Jimenez Gomez		
6. Marlon Gomez J.		
7. Jose Gomez		985-232-1554
8. Jose Gomez		541-729-7693
9. Jose Gomez		
10. Jose Gomez		503-819-7971
11. LUPE CRUZ		503-804-5958
12. Dylan Serrano		503-250-4737
13. Jose Gomez		503-970-4011
14. Jose Gomez		(503) 921-2165
15. Daniel Giron		(503) 971-2276001
16. Abelardo Giron		
17. XAVIER FLORES		(503) 530-0624
18. Tanna		503-299-3415

We support Grimm's Fuel Company's recycling operation and the renewal of their composting permit.

Name	Address	Phone
1. Carlos Soriano		
2. DANIEL SAUTANA		
3. Fermia Sobos P.		
4. Rick Spaul		
5. Rick Spaul		
6. Edith		
7. Rony Martinez		
8. Chris Barker		
9. ROMEREO FERNANDEZ		
10. Juan Hernandez		
11. John		
12. John		
13. Jerry Ponder		
14. Joseph Ponder		
15. Oscar L. Ponder		
16. Isai Navarro		
17. Mark Ross		
18. Shaw P.		

We support Grimm's Fuel Company's recycling operation and the renewal of their composting permit.

Name	Address	Phone
1. Noirena Pae-er, eh		503-7463269
2. Zack Nichols		(503) 574-0706
3. Adelfa Gonzalez		
4. David Hins		503-442-9344
5. Et, Ee		541-760-9425
6. Kyle Fletcher		503 816 0564
7. So Seig Saldivar		
8. <i>W. J. Am...</i>		
9. Tomas Perez		503 841 4163
10. <i>[Signature]</i>		503-320-8314
11. <i>[Signature]</i>		503 419 8750
12. <i>[Signature]</i>		971-998-8548
13. <input checked="" type="checkbox"/> NW Evergreen Lawn Care <i>[Signature]</i>		503-583-9405
14. <i>[Signature]</i>		503-643-0826
15. A New Leaf HS		503-516-2327
16. Eric Kruse		519-4040
17. <i>[Signature]</i>		503-537-4027
18. Landscaping Experts		503 317 6570

We support Grimm's Fuel Company's recycling operation and the renewal of their composting permit.

Name	Address	Phone
1. IRON MOUNTAIN TREE CARE LLC		503 781 5698
2. Jose Caoma		
3. Jose Cuong		
4. Pablo Reyes		
5. Jose Cuarez		
6. Alfredo Hernandez		
7. Hector Melo construction		503-5392884
8. Amy E. [unclear]	Joe Grab Tree service	503-2087583
9. Tom Bartel	1885 SW Jones St. Tigard, OR 97223	503-254-2930
10. [unclear]	[unclear]	503 869-5563
11. RANDY MIHALKO	12431 TROZE RD STERLING	503-891-2763
12. [unclear]	13815 SW MARTINGALE CT.	
13. Lutz Wallace	13815 SW Martingale Ct	
14. [unclear]		
15. [unclear]	9125 SW Hill St Tigard, OR	503-332-5034
16. Jay Gilbert	7270 SW ALDEN ST. Tigard	503-701-2600
17. Jorge Osorio		
18. Bernardo Romero		

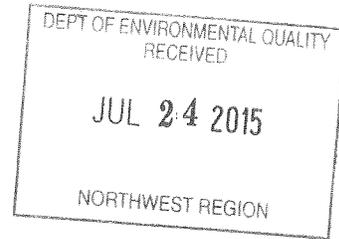
We support Grimm's Fuel Company's recycling operation and the renewal of their composting permit.

Name	Address	Phone
1. RONALD J. CHASE		
2. ERIC VILLAGUION		
3. Eric		
4. [Signature]		
5. [Signature]		
6. [Signature]		
7. [Signature]		
8. RONDA MORGAN		
9. DAVID STODOL		
10. [Signature]		
11. JIMMY [Signature]		
12. BRYAN [Signature]		
13. [Signature]		
14. TIMOTHY J. FLORES		
15. MIGUEL LOPES		
16. ELTON JOHNSON		
17. SERGIO FLORES S.		
18. FELIPE FLORES		

July 21, 2015

Received information pack on July 19, 2015

Request Number 1433 for Permit. Grimm's Fuel.



DEQ Solid Waste Permit Coordinator

700 NE Multnomah, Suite 600

Portland, OR 97232-4100

To whom

~~To~~ That This May Concern,

I am writing this along with my husband. We live in Unit 106 in Angel Haven in Tualatin, Oregon.

I object on so many levels that you are actually even considering this permit to Grimm's Fuel.

Do you realize the can of worms you are causing for retired families of and young families that live here.

We already put up with terrible smells and poor maintenance of this facility.

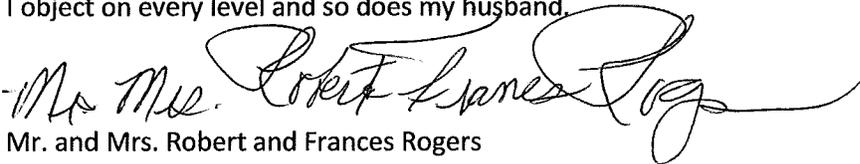
The traffic is already a major problem and the smells that we live with are so bad.

There are many places outside of a city that this should be placed. Young families and the elderly live to closely to this area to have this type of facility. Why would you even consider this type of activity to have this.....Please do not allow Grimm Fuel to be allowed to have this permit.

We have been here and live here and they are trying to change the rules for what they are...

If they want to do that they should have to do this in the country side...not so close to where we share space.

I object on every level and so does my husband.


Mr. and Mrs. Robert and Frances Rogers

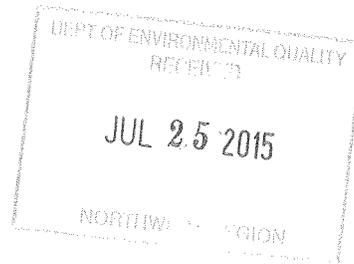
18485 SW Pacific Drive Unit 106

Tualatin, OR 97062

Y

July 24, 2015

DEQ Solid Waste Permit Coordinator,
700 NW Multnomah, Suite 600
Portland, OR 97232



Dear Sirs:

I am a resident of Angel Haven Mobile Home Park, in Tualatin, OR, and have lived here five years. I have received notification of the proposed changes to be made at Grimm's fuel on Pacific Highway. I am writing to let you know I STRONGLY object to their proposal to start composting "food stuffs" (in other words GARBAGE).

Currently the residents of the mobile park are subjected to the smell of manure from the animal waste Grimm's Fuel uses in their compost piles. In addition, our cars, and homes are covered with the fine dust from their composting piles. And, because these particulates are in the air, we are also breathing the junk produced by their process. For those of us who have breathing problems, this is a definite health issue.

Adding garbage to their processing is going to attract rodents, sea gulls, toxins and numerous other unhealthy materials which will strongly impact our quality of life. Obviously a human health assessment needs to be made.

I found it interesting that none of the local residents, nor the management of our park were notified of the supposedly Public Hearing and it was only because one of our residents learned about the hearing that she and other interested parties were able to attend the hearing, voice their complaints and only then was the hearing postponed in order for other interested parties to be notified.

Again, I STRONGLY DISAGREE with the proposal by Grimm's Fuel to add composting of food stuffs to their current activities, and in addition, their current activities need to be more closely monitored to eliminate the noxious odors, dust and unhealthy problems local residents are subjected to.

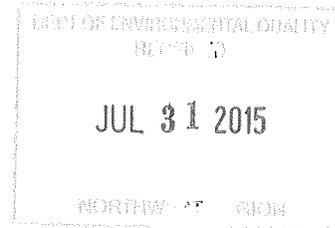
Respectfully,

A handwritten signature in cursive script that reads "Nancy Davis".

Nancy Davis
18485 S.W. Pacific Dr. #87
Tualatin, OR 97062

cc: City of Tualatin, OR
Washington County

July 27, 2015



DEQ Solid Waste Permit Coordinator
700 N.E. Multnomah St., Suite 600
Portland, OR 97232-4100

RE: Proposed Composting Permit, Grimm's Fuel

Dear DEQ Staff:

According to permit number 1433 issued by DEQ to Grimm's Fuel in 2014, the allowable activities indicated under item 1.2 B, on page 3 of 16, "Authorization to receive feedstocks", it is indicated that "Type 3 feedstock that are curbside collected residential food waste mixed with yard debris after completing the requirements of section 1.3 through 1.4 below. No other Type 3 feedstocks can be accepted unless Grimm's receives prior written approval from DEQ." **This is a vital CHANGE from the current materials handled by Grimms.** Why was this added to "allowed feedstocks"? Jeff Grimm has indicated in the past that he has no intent of handling such feedstocks, so the addition of Type 3 feedstocks to this permit raises the question of "WHY?". Grimm's is a high risk facility according to your own Public Notice information. Food waste is prone to be wet and **allowing Type 3 would only add to an already existing problem that Grimm's has with leachate management and odor control as well as problems with pathogens, bacteria, etc.**

- (1) By what authorization did DEQ put this approval in the permit in question? Is DEQ required to allow Type 3 feedstocks or is it discretionary? Why not provide for modification of the permit in the future if Grimm's should modernize enough that they feel that they can handle Type 3 feedstocks?

The proximity of Grimm's facility to businesses, homes and senior care facilities, should have automatically placed "Type 3 Feedstocks" under "Prohibitions" which is section 2.0. Has no one at DEQ even looked at Grimm's Fuel Company in relation to it's location? From "BioCycle" magazine, "Bioaerosols and dust can be inhaled. Toxic organics, particularly in municipal solid waste, can enter the body through the skin as a result of spillage of liquid materials or can be inhaled as vapors in the respiratory system".

Mushroom compost, pesticides, fungus, mold, etc. are vital issues when considering the health of those who live or work within the area affected by Grimm's. **Wind** is a big factor in Grimm's affect on the area and the **wind moves particulates, pathogens and odors** greater distances than a few hundred feet. **Water runoff** is another concern since Grimm's does not have a contained water runoff operation. Has the work environment for the Grimm's employees been considered? There is a big possibility that employees could contract "Farmer's Lung" from working with moldy compost, and those living within close proximity to Grimm's could also contract the same disorder. From an article prepared by "BioCycle" magazine, "Employees of composting operations can be exposed to pathogens, bioaerosols,

toxic chemical substances (both in the air and from handling materials), heavy metals in feedstocks or compost, and dust generated during feedstock preparation and composting". "Information on worker health can be very valuable in the future design of facilities and in evaluating the potential health impact to the areas surrounding composting facilities." "Mitigation measures to reduce worker exposure and potential health affects involve three areas: Personal protection; Facility design; and Operational activities." Grimm's is very much in need of installing modern pollution control equipment, being responsible and bringing their facility up to the 21st century.

- (2) Please provide documentation of DEQ's CURRENT Human Health Risk Assessment study done regarding Grimm's Fuel Company permit.
- (3) Have OSHA, Washington County's Solid Waste Advisory Committee, Tualatin River Keepers, and Clean Water Services of Washington County been involved in any of the permit planning for Grimm's Fuel? Grimm's and surrounding area are located in a floodplain and Grimm's is only a few hundred feet from the Tualatin River.
- (4) Since DEQ has left all study and implementation of their operation plan up to Grimm's, how does Grimm's propose to include the citizens who live in close proximity to their facility in their operation plan? Will there be public notice sent to ALL who live within their proximity? Will there be meetings and the input from the citizens considered?

I have lived in close proximity to Grimm's Fuel for 27 years and over the years the number of piles of compost has grown, Grimm's has done very little to change from the original operation which was at best primitive. 30 feet is too high for the piles at the type of facility that Grimm's is. They should be required to totally fence in the facility with a tall solid wall and plant tall trees around the wall. They should be required to install a liquid handling system that does not pollute our water and ground. They should be required to control odor and air-borne particulates. They should be required to provide a safe work environment for their employees. DEQ working with Washington County and City of Tualatin can implement changes to Grimm's that would benefit everyone concerned.

Sincerely,



Barbara Ouellette
18485 S.W. Pacific Drive, Space 21
Tualatin, OR 97062

cc: Richard Devlin, State Senator
Julie Parrish, State Representative
Washington County Clean Water Services
Washington County Solid Waste Management Supervisor
Tualatin River Keepers

JUL 30 2015

July 27, 2015

Thank you for the Public Notice that was recently mailed out regarding the Grimm's Fuel proposed permit.

Although I am not sure I understand all of the items referred to in the proposal I do have some concerns.

I have lived at my address for 15 years and have a problem with all of the dust and dirt that accumulates in the street and driveway and ends up tracked inside. I feel that most of it drifts over from Grimm's. My mechanic has also commented on the dirt on the top of my car air filter. This comes from dirt in the air, not from the car operation.

I also find the odor from Grimm's is very (over)

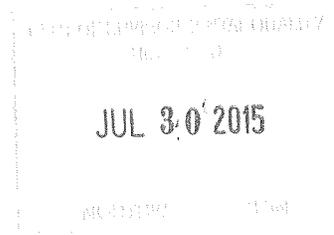
objectional at various
times.

I would like to see
these problems addressed
before any more operations
are considered.

Thank you,

Janice Pennock
18485 SW Pacific Dr. # 27
Tualatin, Or. 97062

July 27, 2015



DEQ Solid Waste Permit Coordinator
700 N.E. Multnomah St., Suite 600
Portland, OR 97232-4100

RE: Grimm's Fuel Proposed Composting Permit

I have lived at Angel Haven Manufactured Home Park located directly across 99W from Grimm's Fuel Company for 17 years. Angel Haven is a 55 plus senior living community that has been in the location for over 30 years. I have wondered in the many years that I have lived here, why I could smell the horrific odor coming from Grimm's Fuel.

I have observed smoke and sometimes flames shooting up from that area. Now I learn that DEQ has not mandated a certain oxygen level and I want to know why this is so.

Mr. Grimm says he does not want to process Type three feed stocks, which is table scraps. Why is DEQ not prohibiting Type three feed stocks in the proposed permit? We do not want Grimm's to process this type of product. How will DEQ resolve this?

My concern is for the health of myself and my neighbors, of which many are in ill health. There are many children who live in the next door community, Pony Ridge, and their health is at risk. The Pathogens should be tested every one to two weeks, not every three months!

Mr. Grimm needs to update his facility and be more responsible.

Thank you for your consideration,

Barbara Robb
18485 S.W. Pacific Drive, Space 117
Tualatin, OR 97062

JUL 30 2015

7/27/15

DEQ Solid Waste Permit Coordinator
700 NE Multnomah, Suite 600
Portland, OR 97232-4100

To Whom It May Concern:

In response to Grimm's composting permit
as follows:

1. Type 3 waste - We do not need table scrap disposal at this site. There is already an odor at this site and we do not need to add to it.
2. Pile Height - It keeps getting higher and higher. When I moved here 15 years ago you could barely ^{see} it + what an eye sore it is now.
3. Pathogens - As stated before, the odor is getting worse when processing the debris. The dust drifts over to Angel Haven M.H. Park. It can't be healthy for us to breathe.

Please take my comments into consideration.

Thank you!



W Linda Williams
18485 SW Pacific Dr. #27
Tualatin, OR 97062
God Bless America

July 28, 2015

DEQ Solid Waste Permit Coordinator
700 NE Multnomah Suite 600
Portland, OR 97232-4100

RECEIVED
JUL 31 2015

As a resident of Angel Haven I am deeply concerned about the proposed permit that you are considering granting to Grimm Fuel , especially type 3 waste.

The current composting of fertilizer now done at this facility causes inordinate amounts of dust and odor. Any further expansion of this will only make matters worse. It is to be hoped that you would eliminate type3 waste completely from this permit now and in the future.

Many of the residents of this community already are coping with breathing problems, and more air pollution will most certainly affect their health. The State of Oregon expresses concern for senior citizens, and this permit is certainly at odds with this concern. These residents have their lives invested here and cannot just move even as their health worsens.

I appreciate Grimm Fuel's desire to expand business and make more profit, however this is the wrong place to do this type of business! In addition to air quality please consider the problem of vermin and associated bacteria, viral infections and fungus.

Thank you for your consideration in this matter.

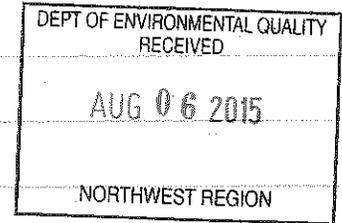
Sincerely,



C.A. Callahan

July 28, 2015

DEQ Solid Waste
700 NE Multnomah St 600
Portland, OR 97232



Dear Sirs:

I am so concerned about adding more waste in this area on Capole Rd. (Grimm's Fuel)

There is alot of population by this facility and all the pathogens that come out of this kind of waste is dangerous, especially for older residents and the young children.

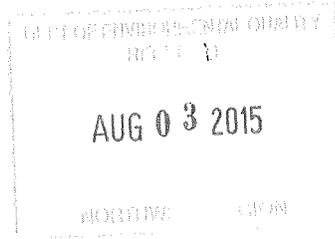
Please reconcider adding this waste place further away from our population.

Thank You,

Dr. Gary Sherman
Nancy Sherman
DeLano & Nancy Sherman
18485 SW Pacific Dr #95
Tualatin, OR 97062

July 29th, 2015

DEQ Solid Waste Permit Coordinator
700 NE Multnomah, Suite 600
Portland, OR 97232



Dear Coordinator,

Please provide a copy of the health risk assessment of Grimm's Fuel. I am an elderly person with COPD who lives nearby. I am concerned about the health risk and air quality. I am a neighbor and I should be recognized. Grimm management has stated they want to do Type 3 waste. I do not believe that Grimm's has actually had a health risk assessment completed.

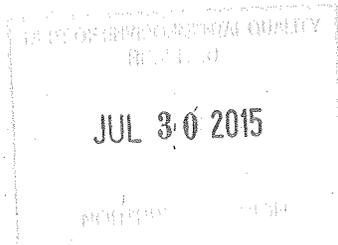
Regards,


Lou Ann Beheler

18485 SW Pacific Drive, #104
Tualatin, OR 97062
Phone: (503) 610-1414

July 27, 2015

Hamid Rad
11209 NW 37th Ct.
Vancouver, WA 98685
rad.hamid@gmail.com
(360) 367-0067



Mr. Marc Stevens
DEQ Solid Waste Permit Coordinator
700 NE Multnomah St. Suite 600
Portland, OR 97232-4100

Dear Mr. Stevens:

I am writing this letter of concern in regards to the potential dangerous and hazardous air pollutions caused by Grimm's Fuel Company located at 18850 SW Cipole Rd, Tualatin, OR 97062 across from more than 260 homes and highly populated area.

I am a clinical assistant professor of mechanical engineering at Washington State University Vancouver (WSUV). I and my family lived on Ute street in Tualatin less than 1000 feet from Grimm's premises from 2002 to 2007. While living there, with small children, often we smell the unpleasant odor of their operations over our house, sometimes even when we were inside the house.

In April of 2007 we moved to Vancouver Washington to work at WSU-V, renting our house on Ute street. A few years ago I learned that the folks living in the Pony Ridge and Angel Haven are very concerned and have filed a number of complaints about increasing air pollution caused by the Grimm's. In a couple of occasions I attended the meetings, as well as my tenant living in the house.

I have learned recently that DEQ is planning to give the permit, Grimm's does not have the permit yet. They are giving permit first, then asking for the odor minimization plan. Ask DEQ as why they are not asking Grimm's to show their plan first.

I have read the reports published by Oregonian and the letters that the neighbors have written to DEQ in this regards and I am astonished how DEQ could and can neglect such important health-related issues when it comes to the healthy environment and quality of the air the neighbors in that area need.

I have a few questions and demands from DEQ as a home/business owner in this neighborhood.

1. I am strongly opposed to DEQ granting permit to Grimm's for type 3 livestock compost. I ask DEQ why this permit draft includes a permit for type 3, even though, Grimm's verbally is not planning to have it. Type 1 and 2 permits were granted much before some of these houses and businesses were built, way before these folks moved to this area and to my understanding, DEQ does not update their standards related to those two permits, and they are not even being monitored and enforced on regular basis!

2. I know for the fact that Oregon DEQ has denied a permit to S and H based on the fact that there is a school within less than a mile from that facilities and the danger to the ground and surface water. What about Grimm's which is located less than 1200 feet from families who live in the homes with small children?? Don't they have the right to have quality air and environment and isn't this play time taken away from their children? Don't they have the right to have their children play outside without worrying that someday they might come down with a diseases in result of the negligence from Grimm's Fuel Company and DEQ who standing behind them and their mission is to protect the air and water quality? What about these families who have the right to quality air, ground, and surface water?
3. Did you know that there is an elderly Alzheimer home at the end of the Pacific Drive not more than 1200 feet from the Grimm's facilities, have you and Grimm's ever considered their right to a quality environment, their health issues and well-being.
4. I want to know what DEQ specifically to determine what Grimm's has done in the past 30 years to improve their process or their equipment to mitigate the odor.
5. Last and not least, as a home owner which owns two properties on Ute street, my tenants complain about the odor and air pollution caused by the Grimm's operations. I am sure this situation affects many others who have a rental properties in this neighborhood as home owners, we feel we have the same economic right as Grimm's Company does.

Thank you for your time and considerations on this matter and I look forward to hearing from you. Please do not hesitate to contact me if you have any questions.

Sincerely,



Hamid Rad, Ph.D.
Clinical Assistant Professor
Department of Mechanical Engineering
Washington State University-Vancouver
14204 NE Salmon Creek Avenue
Vancouver, WA 98686-9600
Work phone: (360) 546-9208
Email: hamidrad@vancouver.wsu.edu



To the DEQ.

Re: Grimm's fuel composting permit

We are against this proposal due to that this is much to close to home.

We are elderly people and are not able to deal with health issues due to living just a few blocks from Grimm's plans which will ruin the air for our area.

Please find a place further out into the country side. This way it will be a good cause without harming our people.

Sincerely,

Anneke Bloomfield +
Jerry Daster
18485 SW Pacific Dr, 69
Tualatin, OR 97062.