



State of Oregon Department of Environmental Quality

Response To Comments

Public Notice for the Draft Modification to Solid Waste Permit #1433 for Grimm's Fuel Company Composting Permit

Public Comment Period: Jan. 21, 2019 to March 4, 2019

On Jan. 21, 2019, DEQ issued a public notice requesting comment on the draft modification to DEQ solid waste composting permit for the Grimm's Fuel Company (Grimm's) composting facility. During a community meeting concerning Grimm's proposed permit modification that took place on Jan. 23, 2019, a commenter brought to DEQ's attention that there were two errors in the proposed permit. DEQ corrected permit conditions 9.20 and 10.1 to align with permit condition 9.21 and require that Grimm's maintains a minimum oxygen level of 10 percent in the aeration system to be built.

DEQ posted the public notice, proposed permit and permit evaluation report to DEQ's Public Notice webpage and DEQ's Grimm's facility webpage. DEQ also mailed the public notice to 1,865 neighbors and interested citizens located within a mile of the Grimm's facility. DEQ placed an advertisement announcing the public notice and public hearing in the Oregonian and the Tigard Tualatin Times. DEQ held a public hearing on Feb. 26, 2019 at the Juanita Pohl Center in Tualatin to receive verbal comments on the proposed modification to the DEQ solid waste permit for Grimm's Fuel. The public comment period closed at 5pm on March 4, 2019.

DEQ received six verbal comments during the public hearing and 53 written comments during the public comment period. DEQ summarized the comments received by topic, followed by DEQ's response. The transcript of the verbal comments received during the public hearing and the written comments received are included as an attachment to this document.

Odor

Comment: DEQ received multiple comments that Grimm's composting facility is emitting odors off-site that are offensive and impact people living near the facility. Commenters stated that odors emanating from Grimm's have caused them, at times, to not go outside in their yards and to keep their home's windows closed and that they can smell the odors on their clothes after being outside. DEQ received several comments requesting that Grimm's not be allowed to emit any odors past the boundary of the facility. Commenters requested that a quantifiable standard for odors be established and that a third-party evaluate odors in the neighborhoods surrounding Grimm's. (*Post, Feb 12, 2019; McGuire, Feb 22, 2019; Sloan, Feb 28, 2019; MacNeil, March 1, 2019; Stephens, March 2, 2019; Fountain, March 3, 2019; Berger, March 1, 2019; Khamis, Feb 25, 2019; Saedi, Mar 4, 2019; ; Craker, Mar 3, 2019; Davis, March 1, 2019; Hamilton, Mar 1, 2019; Tarabochia, March 3, 2019; Klein, March 3, 2019; Hamilton, March 4, 2019; Weber, March 4, 2019; Canedo, Feb 28, 2019; Shaw, March 4, 2019; West, Feb 28, 2019; Brown, March 1, 2019; Kellogg, Feb 28, 2019; Kellogg, Feb 28, 2019; Knutson, March 3, 2019; Moore, March 3, 2019; Rocky B, March 3, 2019; Rayner, March 3, 2019*)

DEQ Response: DEQ regulations identify a performance standard for composting operations regarding odors in OAR 340-096-0070(4). All composting facilities must be designed, constructed, and operated in a manner that, to the greatest extent practicable, consistent with proper facility design and operation, controls and minimizes odors that are likely to cause adverse impacts outside the boundaries of the facility. DEQ agrees with the Metro commissioned study of Grimm's composting operations that

Grimm's needs to change its composting system to an aerobic composting operation and take additional measures to enclose conveyor systems and capture odors from its operations. DEQ agrees with the consultant's conclusions that if Grimm's takes these measures that Grimm's will reduce the quantity of odors and change the profile of odors emitted from Grimm's compost operations.

DEQ has proposed new permit conditions that will require Grimm's to add infrastructure equipment and change their composting practices to create a more aerobic composting process. DEQ expects these modifications to minimize the strength and intensity of the odor and to change the profile of the odor to an earthy, dirt smell.

New permit conditions will require installation of additional odor control equipment, such as the enclosure of the screening and conveyance area, engineered biofilters, and the covering of active compost piles, to further capture and treat odorous compounds.

DEQ recognizes that composting facilities may generate odors that escape the compost operation boundaries. The performance standard is to make sure that the compost operation is designed, constructed, and operated such that any offsite odors will be minimal in strength and intensity, indicating that effective composting is taking place.

DEQ will regularly inspect composting operations at Grimm's and evaluate the effectiveness of the additional permit requirements and whether they are sufficient to minimize odors. As necessary, DEQ will require facility improvements to address operational concerns and compliance issues.

Research indicates that establishing a quantifiable odor standard that can be implemented or enforced is very difficult, time consuming and may not address odor concerns. DEQ will evaluate whether the required actions that Grimm's takes to comply with DEQ's permit address the concerns about odors. DEQ does not plan to use third-party odor evaluations at this time.

Dust

Comment: DEQ received several comments regarding the deposition of dust from Grimm's onto neighboring properties. Commenters requested that Grimm's permit include a condition that does not allow dust to be carried beyond the Grimm's property. Commenters also requested that sampling equipment be installed offsite to measure and quantify offsite dust emissions. (*Saedi, Mar 4, 2019; Craker, Mar 3, 2019; Davis, Mar 1, 2019; Hamilton, Mar 1, 2019; Tarabochia, Mar 3, 2019; Klein, Mar 3, 2019; Hamilton, Mar 4, 2019; Weber, Mar 4, 2019; Canedo, Feb 28, 2019; Shaw, Mar 4, 2019; West, Feb 28, 2019; Brown, Mar 1, 2019; Kellogg, Feb 28, 2019; Kellogg, Feb 28, 2019; Knutson, Mar 3, 2019; Moore, Mar 3, 2019; Rocky B, Mar 3, 2019; Rayner, Mar 3, 2019*)

DEQ Response: DEQ has identified several processes that can generate significant dust, these include grinding, pile turning, screening and conveyance. DEQ has also identified conditions at Grimm's that can increase the generation of dust, such as pile height and insufficient moisture during the handling of material. DEQ has proposed several new permit conditions that will decrease the amount of dust generated by the facility.

A new permit condition requires the screen and conveyers in the central processing area to be enclosed and exhausted through a properly sized-biofilter. Lower pile heights will decrease the amount of material that is exposed to the wind, which DEQ expects will decrease the amount of dust carried off-site. Another

added permit condition requires active compost piles to maintain a minimum 40 percent moisture content, which will work to correct over-dry conditions that perpetuate the generation of dust.

These requirements should ensure that dust from Grimm's does not impact neighbors. DEQ intends to evaluate how successful the proposed permit modifications and process improvements that Grimm's undertakes are at minimizing offsite dust.

General Air Quality Concerns

Comment: DEQ received multiple comments describing concerns that air emissions from Grimm's is negatively impacting the surrounding air quality. Some comments questioned why Grimm's isn't required to have an air quality permit and why they are not required to conduct routine air quality monitoring. DEQ has also received a petition from Grimm's neighbors that asked DEQ to evaluate whether Grimm's should be required to apply for a DEQ Air Quality permit based on projected VOC emissions. Commenters also requested that automated air quality sampling equipment be installed and operated continuously. (*Wilson, Feb 26, 2019; Hamilton, Feb 26, 2019; Johnston, Feb 12, 2019; Anderson, Mar 4, 2019; Michalczyk, Mar 4, 2019; Smith, Mar 3, 2019; Craker, Mar 3, 2019; Davis, Mar 1, 2019; Hamilton, Mar 1, 2019; Tarabochia, Mar 3, 2019; Klein, Mar 3, 2019; Hamilton, Mar 4, 2019; Weber, Mar 4, 2019; Canedo, Feb 28, 2019; Shaw, Mar 4, 2019; West, Feb 28, 2019; Brown, Mar 1, 2019; Kellogg, Feb 28, 2019; Kellogg, Feb 28, 2019; Knutson, Mar 3, 2019; Moore, Mar 3, 2019; Rocky B, Mar 3, 2019; Rayner, Mar 3, 2019*)

DEQ Response: DEQ is currently issuing a modification to Grimm's Solid Waste Compost Permit which will not include air monitoring requirements. The DEQ Materials Management Program has referred all comments concerning the request for DEQ to issue an air quality permit and to conduct air quality monitoring to the DEQ Air Quality Program. The DEQ Air Quality Program is currently evaluating whether composting operations, as a business sector, require air quality permits. If DEQ's Air Quality Program concludes air permits are required, DEQ will propose a process to determine how to require compliance with applicable air quality requirements.

Health Concerns

Comment: DEQ received several comments from individuals stating that their health has been negatively impacted by off-site emissions from Grimm's. Commenters stated that the emissions from Grimm's facility makes them feel sick, causes their eyes and throat to hurt and exacerbates their asthma. Other commenters stated that they have concerns that Grimm's may potentially be impacting other individuals health, including students, and that a comprehensive air quality study be performed to determine which airborne contaminants are present in the air. (*Fountain, Mar 3, 2019; Courtney, Mar 3, 2019; Wyant, Mar 6, 2019; Smith, Mar 6, 2019; Saedi, Mar 4, 2019; Craker, Mar 3, 2019; Davis, Mar 1, 2019; Hamilton, Mar 1, 2019; Tarabochia, Mar 3, 2019; Klein, Mar 3, 2019; Hamilton, Mar 4, 2019; Weber, Mar 4, 2019; Canedo, Feb 28, 2019; Shaw, Mar 4, 2019; West, Feb 28, 2019; Brown, Mar 1, 2019; Kellogg, Feb 28, 2019; Kellogg, Feb 28, 2019; Knutson, Mar 3, 2019; Moore, Mar 3, 2019; Rocky B, Mar 3, 2019; Rayner, Mar 3, 2019*)

DEQ Response: DEQ has worked with the Oregon Health Authority (OHA) and Washington County Public Health to answer several of the health related questions and concerns voiced about Grimm's. This work has been documented in a Frequently Asked Questions document that can be found on [DEQ's](#)

[Grimm's Fuel Company webpage](#). This FAQ discusses what types of compounds are released from compost facilities and how these compounds can potentially effect an individual's health.

OHA is the public agency in Oregon that performs public health assessments. OHA would need scientific information about which specific components of compost emissions could cause health effects and in what quantities. OHA has no scientific basis to determine what specific substance DEQ should test for and no scientific basis to interpret any resulting environmental sampling data in terms of health significance. Therefore, neither OHA nor Washington County Public Health are asking DEQ to perform additional environmental sampling, and OHA is unable to conduct a public health assessment related to Grimm's Compost.

Water Impacts

Comment: DEQ received comments regarding concern that pollution from Grimm's facility is impacting nearby surface water and area ground water. A commenter requested that groundwater and stormwater leaving Grimm's property be tested monthly for herbicides, pesticides and all other potential contaminants. (*Nader, Mar 3, 2019; Craker, Mar 3, 2019; Davis, Mar 1, 2019; Hamilton, Mar 1, 2019; Tarabochia, Mar 3, 2019; Klein, Mar 3, 2019; Hamilton, Mar 4, 2019; Weber, Mar 4, 2019; Canedo, Feb 28, 2019; Shaw, Mar 4, 2019; West, Feb 28, 2019; Brown, Mar 1, 2019; Kellogg, Feb 28, 2019; Kellogg, Feb 28, 2019; Knutson, Mar 3, 2019; Moore, Mar 3, 2019; Rocky B, Mar 3, 2019; Rayner, Mar 3, 2019*)

DEQ Response: Grimm's maintains separation of the leachate (liquid produced during active composting) and stormwater at the site. Leachate is held on-site and applied back onto compost piles to provide moisture to the composting process. The facility has a stormwater treatment system that treats stormwater before it is discharged from the site. Grimm's operates under a National Pollutant Discharge Elimination System (NPDES) 1200-Z Stormwater Discharge Permit requiring stormwater samples at the point of discharge be collected four times per year to verify that facility operations are protective of receiving surface waters. Samples are analyzed for parameters such as total suspended solids, zinc, nitrate, chemical oxygen demand and phosphorous. Clean Water Services (CWS) acts as DEQ's agent in administering Grimm's water quality permit.

DEQ's Solid Waste program has referred the request for Grimm's to sample for herbicides and pesticides to DEQ's Water Quality program and CWS.

When DEQ conducted the environmental screening of potential risks from Grimm's, DEQ identified that there was insufficient information to evaluate whether ground water could potentially be impacted by Grimm's operations at the site. Grimm's operations area, including the active compost areas, is paved. The proposed aerated static pile system will include an impervious pad and leachate collection system. At this time, DEQ does not consider groundwater monitoring to be necessary.

Do Not Support Additional Regulation

Comment: DEQ received comments that reports of offensive odors from Grimm's facility are overstated. Commenters voiced concern that additional environmental oversight will cause a financial burden on Grimm's that may cause them to close the facility. Commenters said that Grimm's has operated at this

location for a long period of time and that it has never caused them any issues or concerns. Several commenters stated Grimm's provides a good service to the area and they are afraid the community may lose this facility, which could lead to increased illegal dumping and cause homeowners to have to drive further and pay more for the service provided. (*Croucher, Feb 12, 2019; GrosJacques, Feb 17, 2019; Sanderson, Mar 1, 2019; McClure, Feb 23, 2019; Barry, Mar 3, 2019; Soles, Feb 15, 2019*)

DEQ Response: Comments of support are noted.

Limit On Feedstock Volume

Comment: DEQ received comments that Grimm's permit should contain an annual limit on the quantity of feedstock that the facility can receive. The quantity limit should be set in accordance with the facility's processing capability. (*Saedi, Mar 4, 2019; Craker, Mar 3, 2019; Davis, Mar 1, 2019; Hamilton, Mar 1, 2019; Tarabochia, Mar 3, 2019; Klein, Mar 3, 2019; Hamilton, Mar 4, 2019; Weber, Mar 4, 2019; Canedo, Feb 28, 2019; Shaw, Mar 4, 2019; West, Feb 28, 2019; Brown, Mar 1, 2019; Kellogg, Feb 28, 2019; Kellogg, Feb 28, 2019; Knutson, Mar 3, 2019; Moore, Mar 3, 2019; Rocky B, Mar 3, 2019; Rayner, Mar 3, 2019*)

DEQ response: DEQ Solid Waste facility permits do not contain limits on the quantity of feedstock that the facility can accept. However, DEQ must approve plans and specifications for the new aerated composting system. The design and construction of the new process as well as the height limits of compost piles and compliance with the DEQ permit conditions, will dictate the amount of material the facility can process, and therefore, receive.

Process Enclosures

Comment: DEQ received comments regarding the need for additional or improved enclosures at Grimm's facility. A commenter said that the current enclosure around the screen and conveyance system should be more professionally designed to ensure that odor and dust is not allowed beyond the facility property line. Several commenters stated that the entire composting operation should be contained within a building. Another comment suggested language be added to state that the enclosure should capture odors from the processing equipment *to the greatest extent possible* and pointed out that the enclosure system will have openings at both ends to receive and discharge material. (*Saedi, Mar 4, 2019; Craker, Mar 3, 2019; Davis, Mar 1, 2019; Hamilton, Mar 1, 2019; Tarabochia, Mar 3, 2019; Klein, Mar 3, 2019; Hamilton, Mar 4, 2019; Weber, Mar 4, 2019; Canedo, Feb 28, 2019; Shaw, Mar 4, 2019; West, Feb 28, 2019; Brown, Mar 1, 2019; Kellogg, Feb 28, 2019; Kellogg, Feb 28, 2019; Knutson, Mar 3, 2019; Moore, Mar 3, 2019; Rocky B, Mar 3, 2019; Rayner, Mar 3, 2019; Grimm, Mar 4, 2019*)

DEQ response: DEQ has approved the constructed enclosure of the trommel screen and conveyance system. Grimm's is required to maintain the enclosure to ensure that odors and dust from the processing equipment is captured and directed to a bio-filer. Periodic inspections by DEQ will ensure that the structure is meeting performance standards.

DEQ considers the requirement to install an aerated composting system adequate to reduce odors and dust. At this time, DEQ does not intend to require Grimm's to operate within an enclosed building.

Definition of Active Composting

Comment: DEQ received comments that the permit should define the difference between the active compost piles, curing compost piles and finished compost piles. Comments also requested that a stability test to be used to identify when material has completed the composting process. (*Craker, Mar 3, 2019; Davis, Mar 1, 2019; Hamilton, Mar 1, 2019; Tarabochia, Mar 3, 2019; Klein, Mar 3, 2019; Hamilton, Mar 4, 2019; Weber, Mar 4, 2019; Canedo, Feb 28, 2019; Shaw, Mar 4, 2019; West, Feb 28, 2019; Brown, Mar 1, 2019; Kellogg, Feb 28, 2019; Kellogg, Feb 28, 2019; Knutson, Mar 3, 2019; Moore, Mar 3, 2019; Rocky B, Mar 3, 2019; Rayner, Mar 3, 2019*)

DEQ response: DEQ is requiring Grimm's to submit for approval, definitions and criteria within their Operation Plan to determine when compost material is in the active phase, curing phase and finished phase. DEQ is recommending that a quantitative "maturity" test be used to assess when the material has finished the active composting phase. DEQ approves the operations plan as part of the permit and does not consider that additional permit conditions are needed at this time to address this concern.

Assessment of Infrastructure and Process Changes

Comment: DEQ received comments that a comprehensive impact study be performed after the required process and infrastructure changes to a more aerobic system have been completed. (*Craker, Mar 3, 2019; Davis, Mar 1, 2019; Hamilton, Mar 1, 2019; Tarabochia, Mar 3, 2019; Klein, Mar 3, 2019; Hamilton, Mar 4, 2019; Weber, Mar 4, 2019; Canedo, Feb 28, 2019; Shaw, Mar 4, 2019; West, Feb 28, 2019; Brown, Mar 1, 2019; Kellogg, Feb 28, 2019; Kellogg, Feb 28, 2019; Knutson, Mar 3, 2019; Moore, Mar 3, 2019; Rocky B, Mar 3, 2019; Rayner, Mar 3, 2019*)

DEQ response: DEQ will be performing periodic unannounced compliance inspections at Grimm's to ensure that the infrastructure additions and changes to composting processes are operating as designed. DEQ will assess whether these changes are adequate to meet performance standards.

Parameter Sampling Verification 3rd Party

Comment: DEQ received comments requesting that DEQ perform verification sampling to confirm that Grimm's is performing the required sampling. Additionally, DEQ received comments that all environmental testing should be performed by an impartial 3rd party. (*Craker, Mar 3, 2019; Davis, Mar 1, 2019; Hamilton, Mar 1, 2019; Tarabochia, Mar 3, 2019; Klein, Mar 3, 2019; Hamilton, Mar 4, 2019; Weber, Mar 4, 2019; Canedo, Feb 28, 2019; Shaw, Mar 4, 2019; West, Feb 28, 2019; Brown, Mar 1, 2019; Kellogg, Feb 28, 2019; Kellogg, Feb 28, 2019; Knutson, Mar 3, 2019; Moore, Mar 3, 2019; Rocky B, Mar 3, 2019; Rayner, Mar 3, 2019*)

DEQ response: DEQ is evaluating how to conduct process parameter sampling verification at permitted compost facilities when conducting inspections. DEQ envisions purchasing and using hand-held monitoring equipment to sample for oxygen, temperature and moisture content during compliance inspections. DEQ does not plan to use a third party to verify parameter sampling at this time.

Monitor and Record Blower Data

Comment: DEQ received comments requesting that Grimm's monitor and record air blower speeds and pressure drops to ensure performance of the compost aeration system. (*Craker, Mar 3, 2019; Davis, Mar 1, 2019; Hamilton, Mar 1, 2019; Tarabochia, Mar 3, 2019; Klein, Mar 3, 2019; Hamilton, Mar 4, 2019; Weber, Mar 4, 2019; Canedo, Feb 28, 2019; Shaw, Mar 4, 2019; West, Feb 28, 2019; Brown, Mar 1, 2019; Kellogg, Feb 28, 2019; Kellogg, Feb 28, 2019; Knutson, Mar 3, 2019; Moore, Mar 3, 2019; Rocky B, Mar 3, 2019; Rayner, Mar 3, 2019*)

DEQ response: The proposed permit requires that the temperature and oxygen content of the piles be directly measured at representative locations. DEQ expects this practice will adequately indicate if aerobic composting conditions are present within the piles.

Citizen Involvement

Comment: DEQ received comments requesting that citizen representatives be included in all meetings between DEQ and Grimm's. DEQ also received requests that request no last-minute changes be made to the proposed DEQ permit without informing the citizen representatives as to the substance of such changes prior to issuance. (*Craker, Mar 3, 2019; Davis, Mar 1, 2019; Hamilton, Mar 1, 2019; Tarabochia, Mar 3, 2019; Klein, Mar 3, 2019; Hamilton, Mar 4, 2019; Weber, Mar 4, 2019; Canedo, Feb 28, 2019; Shaw, Mar 4, 2019; West, Feb 28, 2019; Brown, Mar 1, 2019; Kellogg, Feb 28, 2019; Kellogg, Feb 28, 2019; Knutson, Mar 3, 2019; Moore, Mar 3, 2019; Rocky B, Mar 3, 2019; Rayner, Mar 3, 2019*)

DEQ response: DEQ will continue to communicate with concerned citizens and local environmental groups to meet and discuss concerns regarding Grimm's facility; however, DEQ does not intend to invite citizens to meetings between Grimm's and DEQ. DEQ will follow the prescribed process of public involvement in the Solid Waste permitting process.

Cover for Active Compost Piles

Comment: DEQ received a comment from the facility that placing a cover on the active compost pile during the transition from static pile to ASP is not possible. The facility has to clear over 30 percent of the current composting area to make room for the new ASP area at the northern edge of the pile. This reduction of static area will result in daily pushing greenwaste over the top of Cell 1. Cell 2 will be filled daily with no time to cover. The current ASP bins will use a bio-cover of finished compost as required. (*Grimm, Mar 4, 2019*)

DEQ response: DEQ recognizes that during the transition phase, the active piles will be moved frequently. DEQ expects Grimm's to provide an Operations Plan update to describe the management of the piles with bio-cover.

Process Parameter Monitoring

Comment: DEQ received a comment from the facility regarding the proposed schedule for testing the oxygen content and moisture content of the ASP. The commenter states that daily testing of oxygen content is unnecessary after the temperature-controlled aeration system is commissioned. Commenter is proposing that after the ASP system is calibrated, temperature alone can be used to assess the aerobic status of the ASP. Daily oxygen measurements during start-up will show that the oxygen content remains fairly static and can be reliably predicted by the continuous temperature monitoring of the pile. Commenter also stated that weekly moisture sampling is unnecessary and difficult to perform. Commenter proposes that representative sampling during the construction of the ASP and during the removal or flipping of the material 15 days later (2 sample events in just over two weeks) is sufficient to demonstrate the material stays between the required range of 40-60 percent moisture. (Grimm, Mar 4, 2019).

DEQ response: DEQ proposes to keep the oxygen monitoring conditions unchanged. If after initial start-up period of the ASP system, Grimm's desires to reduce oxygen monitoring, then DEQ recommends that Grimm's propose a pilot study for DEQ's review and approval to demonstrate the temperature alone can be used to show that the ASP systems maintains aerobic conditions with greater than 10 percent oxygen. During the pilot, Grimm's would need to continue monitoring oxygen. Any change based on a pilot would require public notice and public comment.

DEQ proposes to revise the moisture monitoring conditions to allow for the ASP to be remain undisturbed during each 15-day compost period. DEQ will change Permit Condition 9.21.2.c to require moisture monitoring during the construction of the ASP (Day 1 and Day 15) and again during the deconstruction or flipping of the pile (Day 15 and Day 30). The change will require the moisture content to be sampled 4 times in a month.

Permit Changes Made After DEQ Review of Comments

1. **Section 9.21.2.c previously read:** "Moisture content: Monitor at locations that are representative of the active piles weekly."

Section 9.21.2.c now reads: "Moisture content: For each batch of material, monitor at locations that are representative of the active pile 4 times during the active composting phase. Permittee to take a moisture content measurement during the construction of the ASP (Day 1 and Day 15) and again during the deconstruction or flipping of the pile (Day 15 and Day 30)."

Rationale: DEQ proposes to revise the moisture monitoring conditions to allow for the ASP to be remain undisturbed during each 15-day compost period. It is best to add water to the pile during construction to ensure equal and consistent moisture within the pile.

Alternative formats

DEQ can provide documents in an alternate format or in a language other than English upon request. Call DEQ at 800-452-4011 or email deqinfo@deq.state.or.us.

Grimm's Fuel Company Solid Waste Compost Facility Permit No. 1433

Background

DEQ proposes to modify Grimm's Fuel Company (Grimm's) solid waste compost facility permit to include new permit conditions that require Grimm's to build infrastructure and modify composting practices in accordance with Oregon Revised Statute 459 and Oregon Administrative Rules Chapter 340, Divisions 93-96.

Public Notice Period

Pursuant to OAR 340-093-0105(2)(n), modifications of solid waste permits that is not administrative in nature or does not alter permit conditions require Category II public notice in accordance with OAR 340-093-0100(2)(b). This rule requires DEQ to provide notice of the proposed permit actions and a minimum of 30 days for interested persons to submit written comments. According to OAR 340-093-0100(3), DEQ may move a permit action to a higher category if there is anticipated public interest in the facility. DEQ held a public hearing on February 26, 2019. Public comments were provided during the hearing, with emailed and written comments received through Monday May 4, 2019 at 5 p.m.

Public Hearing

Location: Juanita Pohl Community Center
8513 SW Tualatin Road
Tualatin, OR

Date: Tuesday, February 26, 2019

Time Convened 6:00 p.m. Closed 6:50 pm.

DEQ personal remained on site until 8:15 p.m. to talk informally about the permitting process or if additional thoughts or questions came up.

Presiding Officer: Heather Kuoppamaki, Senior Engineer, DEQ NWR

At 6:00 pm. before taking comments, the presiding officer summarized procedures for the hearing including notification that DEQ was recording the hearing. The presiding officer asked that anyone wanting to present verbal comments sign up to give comments. Seven citizens signed up to give comments.

The presiding officer collected the public hearing attendance sheets at the end of the hearing. Information includes attendee's name and whether they wished to give oral comment. The electronic recording of the hearing has been transcribed and is held in the permanent permit file.

Nineteen citizens attended the hearing in addition to DEQ personnel, Metro personnel and Grimm's company representatives. Comments received are summarized below. Six people provided verbal comments. The transcript of the verbal comments is attached to this memo.



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DEQ is a leader in restoring, maintaining and enhancing the quality of Oregon's air, land and water.

Summary

1. Clean Air Safe Environment committee circulated a petition requesting relief from dust and odor. The committee also requested that an air quality permit be issued. All complaints to solid waste should be forwarded to DEQ's air quality division.
2. Concerns from the community have been shared since at least 2013. Concerns include negative impacts from the facility from dust, odors, nausea, headaches, and vomiting. We need to find a solution. On behalf of Oregon Air, a proposal was submitted to solve the dust and odor issues. Use alternative 3 from the Green Mountain Technologies report, indoor composting. Oregon Air prepared to offer assistance in new permitting process and provide community fundraising to finance.
3. The smells are very offensive and sometimes go on for a whole week at a time.
4. Concerns about the leachate from Grimm's contaminating Rock and Chicken Creek and Tualatin River and the Willamette River. Concerns the leachate might be contaminating the drinking water.
5. Smell has been getting worse and worse over the years due to the throughput volume. The new Metro permit did not address all the concerns from the citizens.
6. Request that DEQ hire a contractor to monitor Grimm's for permit compliance. DEQ isn't doing it and can't rely on Grimm's to monitor themselves.
7. Last two years the smell has gotten worse and more frequent. Rotten stench. The compost onsite should be hauled away on a train track or in semi-trucks.
8. Hundreds of dollars a month spent on medical issues. Can't have grandchildren over due to the smell.

Accessibility

Documents can be provided upon request in an alternate format for individuals with disabilities or in a language other than English for people with limited English skills. To request a document in another format or language, call DEQ in Portland at 503-229-5696, or toll-free in Oregon at 1-800-452-4011, ext. 5696; or email deqinfo@deq.state.or.us.



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State of Oregon Department of Environmental Quality
**Public Hearing Transcript for Grimm's Fuel
Proposed Solid Waste Compost Facility
Modification**

Feb. 26, 2019 - Juanita Pohl Center
8513 SW Tualatin Rd.
Tualatin, OR 97062

- Heather: [00:04](#) I will now call the hearing to order. Today is Tuesday, February 26, 2019, and the current time is 6:37 P.M. My name is Heather Kuoppamaki and I will be the presiding officer for this hearing. The purpose of this hearing is to take comments on the proposed DEQ solid waste composting permit, for the [Grimm's Fuel composting facility. I will call people one by one to come up to comment, this meeting is being audio-recorded, and by signing up to provide verbal comments you are consenting to being recorded. Please come to the table when you are called, state your name and speak into the microphone so your comments will be recorded. Please respect the rights of individuals who are making verbal comments, and do not interrupt while they are speaking.
- Heather: [00:49](#) So first up, Janine Wilson? Is that correct? Come on up Janine.
- Janine Wilson: [00:58](#) Thank you, I might need the microphone...
- Heather: [01:01](#) We can turn it on if you like, so people can hear you.
- Janine Wilson: [01:05](#) My name is Janine Wilson, and I am a member of the CASE committee, it's a citizen committee. It stands for Clean Air Safe Environment. In a petition that we circulated, we obtained 243 signatures from citizens, mostly those residents of Pony Ridge, and Angel Haven, which are the-
- Speaker 3: [01:23](#) Yeah it's not...
- Janine Wilson: [01:25](#) It's not picking up.
- Heather: [01:25](#) It's not catching you. You have to kind of talk right at it.
- Speaker 3: [01:28](#) I think it's really, is it on? Okay?
- Janine Wilson: [01:28](#) Is it on now?
- Heather: [01:28](#) (laughter)

Speaker 3: [01:28](#) Okay.

Janine Wilson: [01:41](#) I'll scream. (laughter)

Janine Wilson: [01:44](#) In a petition we circulated, we obtained 243 signatures from citizens. Mostly those residents of Pony Ridge and Angel Haven, which are the closest neighbors to Grimm's Composting Site in Tualatin. The petition was directed to DEQ, requesting relief from dust and odor, which constitute a nuisance on our properties. The draft permit only speaks to minimizing these efforts. We requested that an air quality permit be issued, and have now been told that air quality does not apply to compost facilities. When we perceive dust and odor, we are breathing it. All complaints to solid waste should be forwarded to DEQ's air quality division. I'm submitting our petition to become part of the record. Thank you.

Heather: [02:31](#) Thank you.

Janine Wilson: [02:31](#) So, I can leave these with you.

Heather: [02:36](#) Next up: Brett Hamilton?

Brett: [02:45](#) Good evening. My name is Brett Hamilton. Back in October in 2013, in this same building, I testified to DEQ about the odors emanating from the composting operation at Grimm's Fuel. Five years and numerous public hearings later, hear we are again. Over these years, members of the community have shared their concerns about the negative impacts from this facility. Specifically, dust on their cars, odor in their homes, nausea, headaches and vomiting. Did I mention the odor? It is easy to dwell on the negative impacts from this facility and focus on the problems, however I believe the most effective thing we can do right now is find a solution.

Brett: [03:25](#) On the behalf of the members of Oregon Air, I would like to present our proposal to solve the dust and odor issues once and for all. It has become evident to the members of Oregon Air that the outdoor composting system currently under consideration for Grimm's Fuel in Tualatin will generate a significant amount of off-site odor, and therefore not meet the air quality needs of the surrounding community. Due to the short distance between Grimm's and the surrounding neighborhoods and businesses, we believe that an indoor composting facility comparable to alternative three in the Green Mountain Technologies report is the only solution that will allow Grimm's to continue

composting at their current location while also meeting our needs for complete mitigation of the dust and the odor.

Brett: [04:15](#) Oregon Air proposes a group field trip to the compost factory in Puyallup, Washington to see, smell and learn about indoor composting. In August 2018, Oregon Air tried to arrange for a facility tour of the compost factory, but the operators declined our request. Because Grimm's Fuel is the largest composting operation in the Portland metro area, we believe that they should be equipped with the best composting system for protecting air quality. We understand that this proposal may require new permitting, and we are prepared to offer our assistance to Grimm's in the permitting process in order to make this building a reality.

Brett: [04:54](#) We also understand that this project will require a considerable amount of capital investment, and we are excited for the opportunity to participate in community fund raising efforts to help finance this proposal. We look forward to having a positive working relationship with Grimm's fuel. We believe that an indoor composting facility will meet the needs of all stake holders. For Grimm's, reduce odor complaints, and increase through put. For residents: mitigate dust and odor, improve air quality and protect our health. For businesses: protect property values and worker health. For metro: increase regional composting capacity and protect the environment. For DEQ: protect air quality, protect water quality, and protect human health. For the city of Tualatin, to improve quality of life and allow surrounding development. For the Tualatin River, to eliminate rainfall generated leachate.

Brett: [05:52](#) For more information about this proposal, or to learn more about Oregon Air, please visit our website: OregonAir.org. Thank you.

Heather: [06:00](#) Julie Nader?

Julie Nader: [06:16](#) I'm Julie Nader, and I live in Sherwood, and I'm very offended by the smells. The stench that comes from Grimm's, very, very often. Sometimes for a whole week at a time. However (laughs) I'm not here to talk about odor. I'm very concerned about another aspect. I'm a friend of the refuge. I belong to Tualatin River Keepers, and I have a very serious concern about the leachate from Grimm's contaminating Rock and Chicken Creek, and eventually Tualatin River, and eventually the Willamette River, which is where Sherwood gets its water.

Julie Nader: [06:56](#) The water in Sherwood tastes terrible at times, and they don't seem to be able to figure out the why of it all. I'm very concerned about the health and well-being who live in this whole region. The community has a right to know what we are ingesting and breathing. I sincerely hope you hear my concerns. Thank you for having me.

Heather: [07:25](#) Thank you. Dan Hardy.

Dan Hardy: [07:36](#) My name is Dan Hardy. I too am a member of CASE. Clean Air Safe Environment. I am a 20 plus year property owner in Pony Ridge, which is a neighbor of Grimm's Fuel. When I first purchased this home in Pony Ridge, I grew up on a cattle ranch in eastern Oregon. One morning going to work, I smelled this organic smell, and I thought, "Oh, there must be a dairy nearby." But it was just kind of like not too bad, but over the years, the smell has become major. And we all know why, because the throughput of the volume that Grimm's is producing, because there is a- a reason. Metro needs that, wants that, we are here where we are, and it's been a long time, just like Brett has said.

Dan Hardy: [08:32](#) So, we are happy that Metro, DEQ, the city of Tualatin, the citizenry of Tualatin, Sherwood and Tigard, have come together in a fairly collaborative way. But there's a lot of skepticism still in the community, and I think even tonight. It'd be a hard job being a DEQ person here tonight, I think. And I think we can read body language even, right?

Dan Hardy: [09:10](#) So, we do know that today that Metro has issued their permits for Grimm's to be able to do what they've done, and we know that they haven't really totally listened to the citizenry because of what they've done with the permitting. So, my biggest point here tonight, and what I was supposed to do as a member of CASE meeting is to request that DEQ hire a contract monitor for implementation of this permitting. Because we know right now that the job isn't being done, and the limitation of the reviews and monitoring of Grimm's has been lackluster at best over the last many years. So, in this, you know, if you guys are going to go through and permit this, that's something that we want to definitely have happen, that there's a full-time person hired to monitor this process.

Dan Hardy: [10:30](#) You can't depend-- You guys aren't staffed and aren't doing it. We cannot trust Grimm's to monitor themselves. It's a fox in the hen house situation. Thank you.

Heather: [10:45](#) Thank you. Lorena Stuart.

Lorena: [10:53](#) Yeah, I misunderstood what I was supposed to do, so I apologize.

Heather: [10:57](#) No comment from you? Okay. That's fine. I have a maybe for Julie Newman?

Julie Newman: [11:07](#) Hi, I'm Julie Newman, and I live in Pony Ridge. I have been for three and a half years, and the first year and a half I was there it was ... We could smell stench from Grimm's, but it wasn't like it is now in the last two years where we are smelling it on a daily basis. So, I would like to go on record, having said that I think the rotten compost needs to be removed from the property, and we start over, compost properly, process properly, get the results that Audrey was talking about where it smells. Compost done properly smells like fresh soil. The rotten stench will never go away as long as this continues to get processed. It can be hauled away on a train track. It could be hauled away in semi-trucks. It could be hauled away in dump trucks.

Julie Newman: [12:03](#) It needs to be hauled away. It's poisonous. It's noxious. It's making us ill, and we start from scratch. Thank you.

Heather: [12:14](#) Thank you. And Sharon Hunefeld? Hope I said your name okay there. Shannon?

Sharon: [12:26](#) Sharon.

Heather: [12:26](#) It is Sharon.

Sharon: [12:26](#) Yeah.

Heather: [12:27](#) I Apologize.

Sharon: [12:28](#) That's okay. Thanks.

Sharon: [12:30](#) Hello, I'm Sharon Hunefeld and I have lived in Portland for fifty plus years, and I've actually gotten really sick the last two years. It's costing me over a hundred dollars a month just to get from my allergist to get well, so this has been a big concern for me, and my grandchildren come over, and swim in the pool in the summer, and there's sometimes that I can't have them come over or be outside, because it's so toxic, and for me to get headaches and sick and have to spend money to try to make myself well, when it's our environment that is being polluted by this. It is chemicals and gases and dust and all of these things that are really affecting me and my grandchildren, and that's my biggest concern.

- Sharon: [13:32](#) And I'm about ready to say, "Grimm's you pay for our air cleaners, or you get the stuff away, because you are poisoning us, and I just wanted to be on record to say that I hope this changes, because anyone that lives in this area knows how toxic it is, and how bad it is for our bodies and for my grandchildren, is what I'm really concerned about, besides me. So, I just wanted to say that.
- Heather: [14:07](#) Thank you. So, that's the end of the list that I have. Is there anybody who would like to come up and comment? No additional takers? Okay. The time is now 6:51 PM, and I am closing the hearing. Thank you for your comments.

Alternative formats

DEQ can provide documents in an alternate format or in a language other than English upon request. Call DEQ at 800-452-4011 or email deqinfo@deq.state.or.us.

MIR Naveed

From: dean johnston [REDACTED]
Sent: Tuesday, February 12, 2019 1:07 PM
To: DEQ NWR Solid Waste Permit Coordinator
Subject: Grimm fuel

Thank you for the updated requirements for Grimm Fuel. We live within three blocks (north) and have had to put up with bad air quality for many years (we have lived here since 1998). We hope Grimm fuel does follow your requirements and we can breathe air that's not polluted air.

Thank you
Dean & Kathleen Johnston
[REDACTED]

Sent from my iPhone

MIR Naveed

From: Jamie Anderson [REDACTED] >
Sent: Monday, March 4, 2019 8:52 AM
To: DEQ NWR Solid Waste Permit Coordinator
Subject: Grimm's Fuel comments

Hello,

I have lived on Bull Mountain for 11 years and I have noticed a marked increase in sickening odors in the past year or two. I walk my dog daily and some days when I step out of my house my stomach lurches from the stench. It's a sweet but rotten odor, kind of like acetone, or some other volatile smell. On some days it's given me a headache. There are days when I keep my windows closed and limit my outdoor activities because it's so gross. Something must have changed in recent years at Grimm's because it didn't use to happen like this, or this often. I appreciate the need for local recycling of yard debris but I feel like it's impacted my quality of life here and to be honest, I am thinking of moving away because of the odor. I would support any permit restrictions or improved oversight of Grimm's operations to improve the air quality around here. I used to love living here. Now it depends on the day.

Thank you,

Jamie Anderson
[REDACTED]

MIR Naveed

From: Maria Michalczyk [REDACTED] >
Sent: Monday, March 4, 2019 2:36 PM
To: DEQ NWR Solid Waste Permit Coordinator
Subject: Grimm's Fuel Company and Air Quality

Dear DEQ I am writing you around the Grimm's Fuel Company and the community's air quality.

I want to set forth my concern around the poor air quality and odor that appears to be emanating from Grimm's Fuel company. This air quality issue is intermittent but when the odor is evident it is very intense and as a citizen I worry around the health impact to me, my community and my loved ones. As I live in the zip code 97224, I shop and do business throughout this region and at times the odor can be smelled widely and is so strong that at times I feel nauseous (it smells like strong and intense garbage).

As a concerned citizen, I would ask that DEQ ensure that the air quality/odor is not harmful to our community. I believe that Grimm's can improve their processing and not impact the ecosystem and communities, thus making this a win-win for everyone. I believe that Grimm's offer an important service to our community but do need to modify their processing as to protect the health of everyone.

Thank you so much in looking into this matter.

Maria Michalczyk

MIR Naveed

From: Robin Smith [REDACTED]
Sent: Sunday, March 3, 2019 8:53 AM
To: DEQ NWR Solid Waste Permit Coordinator
Subject: Redo on letter about Grimm's Exposure

My husband and I purchased our home in 2007. We were not informed of any air quality compromise. Had we known, we would have kept looking. How does this gas emittance in our community, affect my living situation? First, home value. Eventually, it will need to be disclosed (in a sale) we live in an area where air quality is compromised on a regular basis. Not only is it a nuisance, and danger, we may be looking at loss of property value. Also, If I eventually want to rent my home, will I be able to keep a renter? I doubt it. Most people with means of moving will do so to avoid exposures. Second, Health concerns.

Other concerns are exposures causing health concerns. Since living here, I have developed asthma. Wheezing becomes severe on days when the gases from Grims are present. When out walking my dog in the neighborhood, I am forced to cover my mouth and nose with scarf, coat sleeve, or anything to filter so I can breathe. I am forced to carry an emergency inhaler in case of exposure from Grims. Third, outdoor food contamination.

Gardening and cooking outside are at risk due to times of extreme exposure. What happens to my vegetables, herbs, etc with light rain absorbing Grimm's gasses drawing them into my gardens? Are we now eating tainted vegetables? The exposure is endless.

We are in a situation where jobs, and finances restrict a move elsewhere. My home is my retirement as we have a large investment in this property. With Grimm's able to pollute and restrict indoor/outdoor living, is stressful on many levels.

I am tired of the argument, "Grim was here first". Does not matter. The city allowed growth around this business without warning of air quality compromise. City planning should have researched a safe distance from Grimm's to build homes for residential living. It is time they moved outside of the city and nearby populations due to health concerns/exposure.

Anger and frustration have not produced change. Now, with public outcry, Media, measurable illness (asthma exacerbation with exposure), gasses and water exposure (fruit trees, vegetable gardens, outdoor cooking) declining property values with eventual disclosure, and poor property rentability, are objective/measurable elements that should require Grimm's to be relocated.

Robin Smith, Pony Ridge Resident

MIR Naveed

From: Ingrid Fountain <[REDACTED]>
Sent: Sunday, March 3, 2019 5:59 PM
To: DEQ NWR Solid Waste Permit Coordinator
Subject: Air Quality --- Grimm's Fuel Composting Permit

Reference: Air Quality – Grimm’s Fuel Composting Permit

We moved to the Mountain Gate neighborhood on Bull Mountain in May 2011. It is a wonderful neighborhood. We much enjoy walking around this neighborhood, gardening in our yard and visiting the local parks and the Tualatin River Refuge just down the road. For the first 4 years at least there was nothing to spoil this idyllic place to live. Unfortunately now, on most days, a nasty smell hangs in the air. We started noticing this putrid, sickening, manure type smell approximately 3 years ago. At the same time I started developing breathing problems and I now require the use of an inhaler. I believe this disgusting stench and the subsequent drop in the air quality is the cause of my ill health. What's more I believe Grimm's fuel's pile of compost to be responsible for this horrid smell and the drop in air quality in recent years. I personally hold them responsible for my health decline. I am 100% against Grimm's fuel being issued a new permit before they address the size of the pile and adequate control of the stench. **Grimms have continued to violate their operating license for many years and therefore I believe it is appropriate to suspend their license until they are in compliance and have addressed their emissions to the satisfaction of an independent party.**

Ingrid Fountain
[REDACTED]

MIR Naveed

From: J Courtney <[REDACTED]>
Sent: Sunday, March 3, 2019 8:11 PM
To: DEQ NWR Solid Waste Permit Coordinator
Subject: Air Quality

I'm a teacher in Tigard. There are many days that the smell from Grimm makes it to where students feel ill at recess. At times, the stench makes it's way into the classroom through the HVAC system. More so than the annoyance, I'm worried about potential health risks to developing bodies.

Thank you for your time.
Jessica

Sent from my iPhone

MIR Naveed

From: Elizabeth Wyant [REDACTED] >
Sent: Wednesday, March 6, 2019 6:02 PM
To: DEQ NWR Solid Waste Permit Coordinator
Subject: GRIMMS AWFUL POLLUTION

Hello - I live just next to Progress Ridge ([REDACTED]) and the ABSOLUTELY HORRIFIC smell from Grimms has begun YET AGAIN (it started last night).

INSIDE my home (and all over the neighborhood), my eyes itch and are red and burning, my throat hurts, I'm nauseous, it stinks 24/7 and I can't even breathe comfortably.

It's REALLY BAD and I don't think I can take it for months on end again. I feel sick and it hardly seems fair that I can't get reprieve from the AWFUL ODOR/GASES being released.

Please do something to stop this.

Thank you,

Elizabeth Wyant
[REDACTED] c

MIR Naveed

From: Jeff Grimm [REDACTED] >
Sent: Monday, March 4, 2019 4:44 PM
To: jeremy.fleming@state.or.us
Subject: Comments on Grimm's Fuel proposed license 1433

Jeremy,

Below are our comments regarding the proposed license.

9.18 **Cover for active compost piles.** Within 60 days of permit issuance, the permittee must apply a cover, such as porous overs and composted material, on all active compost piles for at least the first 15 days of composting. The permittee must describe in its operation plan how it will adequately maintain the cover. During the transition from static pile to ASP, the permittee will top all active compost piles with bio-cover. [This is simply not possible for the static pile as we transition to ASP. We are having to clear over 30% of our current composting area to make room for the new ASP area at the northern edge of the pile. This reduction of static area will result in daily pushing greenwaste over the top of Cell 1. Cell 2 will be filled daily with no time to cover. The current ASP bins will use a bio-cover of finished compost as required.](#)

9.19 **Capture and treatment of odors form screening and transfer process.** The permittee must maintain an enclosure of the screening and conveyance system to capture the odors from the processing equipment, [to the greatest extent possible](#). Captured air will be directed to a properly sized bio-filter with an irrigation system that is maintained to provide optimum filtering capability. [The mulch is transferred with trackhoes, the trommel screens are open at one end to receive material and at the other to discharge compost overs. We have engineered a suction system that captures as much of the air from screening as possible and directs to a properly sized bio-filter.](#)

9.21 **Process Controls.**

2(a) [Measuring oxygen on a daily basis pointless. Weekly measurement will confirm the system is performing as designed. As an example, we took O2 daily samples for the three initial bins and the results are below.](#)

Zone	#1	#2	#3
	O2%	O2%	O2%
2/20/2019	20.20	19.50	empty
2/21/2019	13.40	18.80	empty
2/22/2019	20.20	19.50	empty
2/23/2019	11.60	18.60	20.70
2/24/2019	16.00	19.00	17.40
2/25/2019	20.80	18.50	18.60
2/26/2019	15.90	18.20	19.00
2/27/2019	19.80	16.80	18.00
2/28/2019	15.20	17.40	18.10
3/1/2019	16.40	20.40	19.00
3/2/2019	13.20	20.50	19.30
3/3/2019	19.30	19.50	17.90
3/4/2019	18.40	15.70	19.30

2(c) Moisture content will be taken as an ASP zone is filled and each time it's turned or emptied. This will result in a bi-weekly (15 days) frequency. We would like to disturb the material in the ASP process as little as possible. Records will be kept and procedures for proper moisture will modified as required.

Respectfully,

Jeff Grimm | General Manager

[REDACTED]
Grimm's Fuel | 18850 SW Cipole Rd | Tualatin, OR 97062

www.grimmsfuel.com



MIR Naveed

From: Rabah Khamis [REDACTED] >
Sent: Monday, February 25, 2019 12:03 PM
To: DEQ NWR Solid Waste Permit Coordinator
Subject: Re: DEQ Requests Comments on Proposed Grimm's Fuel Company Solid Waste Compost Facility Permit Modification

Hello,

These are my comments regarding the hearing on the permit for Girmms Fuel company located on 18850 SW Cipole Road, Tualatin, OR.

The awful compost smell we have to endure every day is becoming unbearable. We can not hang out in our front yard or keep the main door open without being subjected to such a terrible scent. Our front yard smells like a sewer pipe has been busted for weeks. As the summer is approaching it will be very hard to open our windows to air up our house without being subjected to such a torture.

While I think the proposal to require Grimm's to build infrastructure to reduce odor was a good move, I do not see now how the city or the county or the state measured the enforcement. Evident by the terrible odor we are getting at least 2 miles away from Grimm's location, it looks like Grimm's is playing the system. It looks like that 2015 proposal has not done much to enhance the living quality of the people around the area; on the contrary, it made it worse.

I suggest:

1. The timeline of the DEQ proposal be more stricter and Grimm's should guarantee highest priority to implement before accepting any more waste.
2. The timeline for Grimm's to reduce the pile heights should be very aggressive
3. The aeration system, bio filter, and enclosures of solid waste should be give higher priority
4. I agree with requiring them to cover all piles of food waste.
5. DEQ should continuously monitor the implementation of the items requested (like quarterly or semi-annual) studies or monitoring visits
6. Fines for breaking the agreement or delay of implementation should be higher
7. Neighbors affected should be compensated

Thanks

Rabah Khamis
[REDACTED]

MIR Naveed

From: Emily Post <[REDACTED]>
Sent: Tuesday, February 12, 2019 9:38 AM
To: DEQ NWR Solid Waste Permit Coordinator
Subject: Comment

To Whom it May Concern,

My name is Emily and I live in King City Oregon with my young Family. We just moved to Oregon this past year from Kentucky. We absolutely love living here, but I must say, the only draw back is a mysterious horrible smell that floats through our neighborhood frequently. At first I thought it was rotting Blackberries, but then I noticed it was happening in all seasons and covered a massive area, as I could smell it all the way in Sherwood at times. The smell is so bad, that it stops us from playing outdoors with our kids. When I found out that the smell was coming from a composting facility near by, I wondered why there weren't measures taken to prevent such a smell from invading all of our homes. I am asking, as a fellow citizen, for Grimms to do whatever is necessary to stop the smell. It genuinely affects the community we share in a most negative way. No one wants to walk outside and be so disturbed by what smells like a dirty diaper, - that they can't breath in the fresh air! Please be good Neighbors Grimms:)

Thank you for listening,

+ E M I L Y P O S T +

MIR Naveed

From: Nancy McGuire [REDACTED] >
Sent: Friday, February 22, 2019 10:22 AM
To: DEQ NWR Solid Waste Permit Coordinator
Subject: Grimm's Fuel company permit

I've been a long time residence of the area. When I was a girl there was a pig farm almost where Grimm's is located. (99W & Cipole Rd, Laurel hedge is still there) So the smell is almost the same. It helps me with my weight lost for the smell makes me nauseous. So I can't eat. Periodically I can't take my daily walks because of the smell but that is the reality of what they do. When I lived by a sewer plant it stunk too. When the wind shifted you could smell the dairy close by too. I am fortunate to have AC so I can close my windows. I do not compost because of the nausea it has given me since a young girl and had to carry the compost pail out to the compost box. I never like changing dirty diapers because of the nausea. Why I have no pets. Rambling of a middle aged body but a young at heart woman. If they can do a better job with the smell go for it. Sincerely, Nancy M.

Sent from my iPhone

MIR Naveed

From: Kristi Sloan [REDACTED]
Sent: Thursday, February 28, 2019 1:22 PM
To: DEQ NWR Solid Waste Permit Coordinator
Subject: Grimm's Fuel

I'd like to submit public input on Grimm's Fuel. Their smell is awful.
Surprisingly, we are 2.9 miles from their site and the awful smell only seems to get worse.

Kristi

MIR Naveed

From: Jane Mac Neill [REDACTED]
Sent: Friday, March 1, 2019 11:26 AM
To: DEQ NWR Solid Waste Permit Coordinator
Subject: Grimm's Fuel, Tualatin, OR

Sirs,
I moved into King City in late 2012 and over the years, have noticed unpleasant odors coming from the direction of Grimm's. Last summer, however, I had an outside project that lasted days and I was appalled by the awful smells coming from Grimm's Fuel. I know Grimms has been in its location a long time and provides a community service (recycling), but as our population has grown, so has the problem of having a recycler so close.

If there is anything DEQ can do to help control the odors, I am a supporter.

Yours truly,
Jane MacNeill

[REDACTED]

MIR Naveed

From: Deirdre Chisholm Stephens [REDACTED]
Sent: Saturday, March 2, 2019 12:18 PM
To: DEQ NWR Solid Waste Permit Coordinator
Subject: Grimm's Fuel

To Whom It May Concern,

Thank you for the information packet and this opportunity to submit comments.

I live in the Angel Haven Manufactured Home park, so am very familiar with the odors from Grimm's. Grimm's provides a valuable and necessary service to the Portland metro area, and I have appreciated a facility that takes in yard debris and recycles it.

I have not appreciated the stench coming from the facility. Having previously lived in a house with a large yard, I took advantage of Metro's compost bins. From that I learned about the process of composting, which includes turning the materials regularly. I have wondered about Grimm's ability to turn their massive compost piles, and after moving here a little over a year ago, I realized they are actually not able to compost properly. I have been frustrated multiple times over this past year with the stench overpowering the natural smells, especially when I needed to close my windows in the summer. I walk most days, and find myself wondering if I'm doing myself more harm than good by breathing in whatever bacteria are in the air.

I'm happy that Metro is moving forward with regulating the stench, and in the long run Grimm's will have a much higher quality product to offer, as well as a healthier work environment for their staff. And of course much better relations with their neighbors.

Thank you for your time on this project. I'm very much looking forward to breathing regular air.

Deirdre

MIR Naveed

From: Tim Fountain [REDACTED]
Sent: Sunday, March 3, 2019 7:58 PM
To: DEQ NWR Solid Waste Permit Coordinator
Subject: Grimms License and continued operaton

Dear sir/madam,

I have been living in Tigard/Bull Mountain for 8+ years. During that time, and especially in the last 3-4 years, the odor from Grimms, which is ~2 miles from my home, has dramatically increased. I can no longer enjoy my home or garden, and I smell the odor from Grimms for many miles around Tigard. It is clear that the odor from the operation has dramatically increased, to levels that trigger breathing problems in my family. It is time for the DEQ to assert their authority and decline the renewal of Grimms license until such times as they can comply and not be a smelly, offensive operation that is a nuisance to neighborhoods for many miles around....

--

Kind Regards

- Tim Fountain

MIR Naveed

From: ray berger [REDACTED]
Sent: Friday, March 1, 2019 3:17 PM
To: DEQ NWR Solid Waste Permit Coordinator
Subject: Grimm's odor

I am sick from the smell when it blows SE-S-SW as it makes us nauseous all the way up here on Bull Mtn. It has grown progressively worse the last 3 years. How long does it take to relocate this nuisance? Blows west, it smells like shit in Tigard, North wind, likewise in Sherwood. Overwhelming. Is it an chemical accelerator in the mixture? Why should we put up with this if you have expanded the urban growth boundary from rural. I don't care how many years it's been there. Thanks, Ray Berger

MIR Naveed

From: Penny Kellogg [REDACTED]
Sent: Thursday, February 28, 2019 10:45 AM
To: DEQ NWR Solid Waste Permit Coordinator
Subject: Re: proposed permit

To Whom It May Concern:

We appreciate the efforts that DEQ has made to bring Grimm's Fuel into compliance with existing regulations. We are thankful that the DEQ permit is requiring the facility to upgrade to an aerobic system, however, there are a number of areas where the proposed permit does not meet our needs:

Offsite Odor: Considering that DEQ has declined the opportunity to put any measurable odor standard in the permit, we request that the permit require no offsite odor. We will not tolerate nuisance odors in our homes and on our private property. We respectfully request that DEQ replace the vague language of "controls and minimizes odors" with an odor standard that is clear, meaningful, and measurable.

Public Health: We have serious concerns over the potential health impacts from living downwind from this composting operation, and we demand a comprehensive air quality study be performed to determine which airborne contaminants are present in the air. We have a right to know what is in the air that we are breathing. We are concerned about herbicides and pesticides that may be present in the feed stocks. We believe that the regulator and the operator both have a moral and ethical responsibility to prove that the air around the facility is safe to breathe. We request that automated air quality monitoring equipment be installed and operated 24/7.

Dust Monitoring: We request that the permit require the installation of offsite sampling equipment to capture dust and particulates for analysis and measurement. Dust and particulates pose a threat to both health and private property. We request that the DEQ permit require continuous dust monitoring, with special attention paid during turning events.

Air Permit: Based on calculations of yearly VOC emissions, we respectfully request that DEQ require an Air Contaminant Discharge Permit (ACDP) for this facility.

Active Composting: We request that the permit define the difference between active compost piles, curing compost piles, and finished compost piles. We ask that the permit include a stability test that uses clear, objective, measurable criteria.

Impact Study: Although the transition to ASP composting may take 18 months, the proposed permit term is 5 years. Therefore, we request that DEQ require a comprehensive impact study to be performed after the facility has completed the transition to ASP composting.

Verification and Audit: We request that the permit describe the process that DEQ will use to double check and confirm the veracity of all parameters measured by the operator. Self regulation is not a feasible solution when it creates a conflict of interest. We request that all test equipment be calibrated and all test procedures be audited.

Flow Rate: Considering that air flow is crucial to maintaining proper temperature and oxygen levels in the active piles, we request that the permit require the operator to monitor, track, and record the air flow rate and pressure drop on all air blowers at the facility.

Input Limit: We request that the permit require an engineering study be performed to determine the maximum throughput capacity of the compost system. We request the permit to require that the operator never exceed the maximum throughput capacity of the system.

Water Quality: We request monthly sampling of groundwater and stormwater for herbicides, pesticides, and all other potential waterborne contaminants. We request that sample wells be used for monitoring groundwater. Contaminated leachate must never be discharged into our local creeks and rivers, and we request monthly testing of nearby creeks and ponds for contamination.

Third Party Testing: Considering the high value of neighborhood livability, private property, public health, and the natural environment, it is imperative that all testing and monitoring be performed with the highest level of veracity and accountability. Self regulation is not feasible when it creates a conflict of interest, therefore, we are demanding that all environmental testing and monitoring be performed by an impartial third party.

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Indoor Composting: In order to protect the health, safety, and property of the people who live and work near the facility, and considering the adverse conditions that we have lived under for the past many years, plus the fact that we are being asked to endure even more dust and odor conditions going forward, we respectfully request that the parties take a serious look at indoor composting. We seek a long-term solution, and we believe that indoor composting is the only solution that can meet the needs of all stakeholders.

Penny Kellogg



MIR Naveed

From: Julie Rayner [REDACTED]
Sent: Sunday, March 3, 2019 6:46 PM
To: DEQ NWR Solid Waste Permit Coordinator

I strongly support the Oregon Air position.
Please take the actions requested.

Sincerely,
Julie Rayner
[REDACTED]

MIR Naveed

From: R B <[REDACTED]>
Sent: Sunday, March 3, 2019 6:20 PM
To: DEQ NWR Solid Waste Permit Coordinator
Subject: Response to DEQ Proposed Permit

Response to DEQ Proposed Permit

We appreciate the efforts that DEQ has made to bring Grimm's Fuel into compliance with existing regulations. We are thankful that the DEQ permit is requiring the facility to upgrade to an aerobic system, however, there are a number of areas where the proposed permit does not meet our needs:

Offsite Odor: Considering that DEQ has declined the opportunity to put any measurable odor standard in the permit, we request that the permit require no offsite odor. We will not tolerate nuisance odors in our homes and on our private property. We respectfully request that DEQ replace the vague language of "controls and minimizes odors" with an odor standard that is clear, meaningful, and measurable.

Public Health: We have serious concerns over the potential health impacts from living downwind from this composting operation, and we demand a comprehensive air quality study be performed to determine which airborne contaminants are present in the air. We have a right to know what is in the air that we are breathing. We are concerned about herbicides and pesticides that may be present in the feed stocks. We believe that the regulator and the operator both have a moral and ethical responsibility to prove that the air around the facility is safe to breathe. We request that automated air quality monitoring equipment be installed and operated 24/7.

Dust Monitoring: We request that the permit require the installation of offsite sampling equipment to capture dust and particulates for analysis and measurement. Dust and particulates pose a threat to both health and private property. We request that the DEQ permit require continuous dust monitoring, with special attention paid during turning events.

Air Permit: Based on calculations of yearly VOC emissions, we respectfully request that DEQ require an Air Contaminant Discharge Permit (ACDP) for this facility.

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Impact Study: Although the transition to ASP composting may take 18 months, the proposed permit term is 5 years. Therefore, we request that DEQ require a comprehensive impact study to be performed after the facility has completed the transition to ASP composting.

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Let's work this out together,

Rocky B. (Ponyridge Neighborhood)



MIR Naveed

From: J Moore [REDACTED]
Sent: Sunday, March 3, 2019 4:44 PM
To: DEQ NWR Solid Waste Permit Coordinator
Subject: Response to DEQ Proposed Permit

Hello,

We appreciate the efforts that DEQ has made to bring Grimm's Fuel into compliance with existing regulations. We are thankful that the DEQ permit is requiring the facility to upgrade to an aerobic system, however, there are a number of areas where the proposed permit does not meet our needs:

Offsite Odor: Considering that DEQ has declined the opportunity to put any measurable odor standard in the permit, we request that the permit require no offsite odor. We will not tolerate nuisance odors in our homes and on our private property. We respectfully request that DEQ replace the vague language of "controls and minimizes odors" with an odor standard that is clear, meaningful, and measurable.

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Regards,

June Moore

MIR Naveed

From: Chris Knutson <[REDACTED]>
Sent: Sunday, March 3, 2019 12:20 PM
To: DEQ NWR Solid Waste Permit Coordinator
Cc: Chris Knutson
Subject: Responce to DEQ proposed permit to Grimm's Fuel

Hello,

We, my spouse and I, have lived less than 1 mile from Grimm's Fuel for more than 10 years. Up until the last few years, we rarely noticed the smell that Grimm's produced. I was not even aware of Grimm's until the past few years when the stench has become much more frequent and strong. Now, I am very aware of them as the source of this stench.

I consider myself an environmentalist. We recycle what we can, have our own compost pile and use it when possible and repair broken things rather than throwing them away. I strive to be a good steward of our environment, and hope my neighbors do the same. I also want to Grimm's to stay in business and be a good neighbor. For those reasons, I agree with the good folks at www.oregonair.org and agree with the following statement.

Response to DEQ [Proposed Permit](#)

We appreciate the efforts that DEQ has made to bring Grimm's Fuel into compliance with existing regulations. We are thankful that the DEQ permit is requiring the facility to upgrade to an aerobic system, however, there are a number of areas where the proposed permit does not meet our needs:

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February 25, 2019

Kind regards,
Chris Knutson

MIR Naveed

From: Capkellogg [REDACTED]
Sent: Thursday, February 28, 2019 10:46 AM
To: DEQ NWR Solid Waste Permit Coordinator
Subject: Re: Proposed Permit

To Whom It May Concern:

We appreciate the efforts that DEQ has made to bring Grimm's Fuel into compliance with existing regulations. We are thankful that the DEQ permit is requiring the facility to upgrade to an aerobic system, however, there are a number of areas where the proposed permit does not meet our needs:

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Public Health: We have serious concerns over the potential health impacts from living downwind from this composting operation, and we demand a comprehensive air quality study be performed to determine which airborne contaminants are present in the air. We have a right to know what is in the air that we are breathing. We are concerned about herbicides and pesticides that may be present in the feed stocks. We believe that the regulator and the operator both have a moral and ethical responsibility to prove that the air around the facility is safe to breathe. We request that automated air quality monitoring equipment be installed and operated 24/7.

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Craig Kellogg



MIR Naveed

From: Lisa Hamilton [REDACTED]
Sent: Monday, March 4, 2019 10:04 AM
To: DEQ NWR Solid Waste Permit Coordinator
Subject: Grimm's Compost Permit

I have lived with this smell for years. It seems it gone on too long and is inappropriate for such an urbanized / growing area. The odor has a significant impact on livability and property values. Please help those of us who have dealt with this for too long.

Thank you! Lisa Hamilton, Bull Mountain Resident

Response to DEQ Proposed Permit

We appreciate the efforts that DEQ has made to bring Grimm's Fuel into compliance with existing regulations. We are thankful that the DEQ permit is requiring the facility to upgrade to an aerobic system, however, there are a number of areas where the proposed permit does not meet our needs:

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February 25, 2019

From: Gkleins [REDACTED]
Sent: Sunday, March 3, 2019 6:06 PM
To: DEQ NWR Solid Waste Permit Coordinator
Subject: Grimms comments.

As a citizen who live close to Grimms, we appreciate anything DEQ and others can do to help us and the environment. Below are some thoughts and details to be considered.

Response to DEQ [Proposed Permit](#)

We appreciate the efforts that DEQ has made to bring Grimm’s Fuel into compliance with existing regulations. We are thankful that the DEQ permit is requiring the facility to upgrade to an aerobic system, however, there are a number of areas where the proposed permit does not meet our needs:

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Thank you, George and Leanne Klein



MIR Naveed

From: Christina Tarabochia [REDACTED] on behalf of
Christina Tarabochia [REDACTED]
Sent: Sunday, March 3, 2019 5:31 PM
To: DEQ NWR Solid Waste Permit Coordinator
Subject: Grimm's

I want to add my voice to support for the Oregon air position. I am a substitute teacher and travel from school to school on almost a daily basis. It is crazy to me the wide radius of schools in the Tigard Tualatin district who are affected by the smell. It also has lowered the quality of life at my own home on Bull Mountain. It sometimes makes me nauseous to walk the dog. I feel as if I am breathing in toxic chemicals. I can't open windows, or enjoy my deck. I'm looking forward to restrictions that keep us all healthy.

Christina Tarabochia

MIR Naveed

From: Russ Davis [REDACTED]
Sent: Sunday, March 3, 2019 5:28 PM
To: DEQ NWR Solid Waste Permit Coordinator
Subject: Grimm's Fuel Permit

Response to DEQ [Proposed Permit](#)

We appreciate the efforts that DEQ has made to bring Grimm's Fuel into compliance with existing regulations. We are thankful that the DEQ permit is requiring the facility to upgrade to an aerobic system, however, there are a number of areas where the proposed permit does not meet our needs:

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From: Ellen Brown [REDACTED]
Sent: Friday, March 1, 2019 10:27 AM
To: DEQ NWR Solid Waste Permit Coordinator
Subject: I am an allergy sufferer- Clean Air please!

Oregon Air

[Action](#)[Proposal](#)[Metro](#)[DEQ](#)[Docs](#)[News](#)[Odor](#)[Contact](#)

Response to DEQ Proposed Permit

We appreciate the efforts that DEQ has made to bring Grimm's Fuel into compliance with existing regulations. We are thankful that the DEQ permit is requiring the facility to upgrade to an aerobic system, however, there are a number of areas where the proposed permit does not meet our needs:

Offsite Odor: Considering that DEQ has declined the opportunity to put any measurable odor standard in the permit, we request that the permit require no offsite odor. We will not tolerate nuisance odors in our homes and on our private property. We respectfully request that DEQ replace the vague language of "controls and minimizes odors" with an odor standard that is clear, meaningful, and measurable.

Public Health: We have serious concerns over the potential health impacts from living downwind from this composting operation, and we demand a comprehensive air quality study be performed to determine which airborne contaminants are present in the air. We have a right to know what is in the air that we are breathing. We are concerned about herbicides and pesticides that may be present in the feed stocks. We believe that the regulator and the operator both have a moral and ethical responsibility to prove that the air around the facility is safe to breathe. We request that automated air quality monitoring equipment be installed and operated 24/7.

Dust Monitoring: We request that the permit require the installation of offsite sampling equipment to capture dust and particulates for analysis and measurement. Dust and particulates pose a threat to both health and private property. We request that the DEQ permit require continuous dust monitoring, with special attention paid during turning events.

Air Permit: Based on calculations of yearly VOC emissions, we respectfully request that DEQ require an Air Contaminant Discharge Permit (ACDP) for this facility.

Active Composting: We request that the permit define the difference between active compost piles, curing compost piles, and finished compost piles. We ask that the permit include a stability test that uses clear, objective, measurable criteria.

Impact Study: Although the transition to ASP composting may take 18 months, the proposed permit term is 5 years. Therefore, we request that DEQ require a comprehensive impact study to be performed after the facility has completed the transition to ASP composting.

Verification and Audit: We request that the permit describe the process that DEQ will use to double check and confirm the veracity of all parameters measured by the operator. Self regulation is not a feasible solution when it creates a conflict of interest. We request that all test equipment be calibrated and all test procedures be audited.

Flow Rate: Considering that air flow is crucial to maintaining proper temperature and oxygen levels in the active piles, we request that the permit require the operator to monitor, track, and record the air flow rate and pressure drop on all air blowers at the facility.

Input Limit: We request that the permit require an engineering study be performed to determine the maximum throughput capacity of the compost system. We request the permit to require that the operator never exceed the maximum throughput capacity of the system.

Water Quality: We request monthly sampling of groundwater and stormwater for herbicides, pesticides, and all other potential waterborne contaminants. We request that sample wells be used for monitoring groundwater. Contaminated leachate must never be discharged into our local creeks and rivers, and we request monthly testing of nearby creeks and ponds for contamination.

Third Party Testing: Considering the high value of neighborhood livability, private property, public health, and the natural environment, it is imperative that all testing and monitoring be performed with the highest level of veracity and accountability. Self regulation is not feasible when it creates a conflict of interest, therefore, we are demanding that all environmental testing and monitoring be performed by an impartial third party.

Transparency: We request that citizen representatives be included in any and all meetings between DEQ and Grimm's. We request that no last-minute changes be made to the proposed DEQ permit without informing the citizen representatives as to the substance of such changes prior to issuance.

Indoor Composting: In order to protect the health, safety, and property of the people who live and work near the facility, and considering the adverse conditions that we have lived under for the past many years, plus the fact that we are being asked to endure even more dust and odor conditions going forward, we respectfully request that the parties take a serious look at indoor composting. We seek a long-term solution, and we believe that indoor composting is the only solution that can meet the needs of all stakeholders.

February 25, 2019

From: Amy West [REDACTED]
Sent: Thursday, February 28, 2019 7:48 AM
To: DEQ NWR Solid Waste Permit Coordinator
Subject: Grimms Permit

Response to DEQ [Proposed Permit](#)

We appreciate the efforts that DEQ has made to bring Grimm's Fuel into compliance with existing regulations. We are thankful that the DEQ permit is requiring the facility to upgrade to an aerobic system, however, there are a number of areas where the proposed permit does not meet our needs:

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Public Health: We have serious concerns over the potential health impacts from living downwind from this composting operation, and we demand a comprehensive air quality study be performed to determine which airborne contaminants are present in the air. We have a right to know what is in the air that we are breathing. We are concerned about herbicides and pesticides that may be present in the feed stocks. We believe that the regulator and the operator both have a moral and ethical responsibility to prove that the air around the facility is safe to breathe. We request that automated air quality monitoring equipment be installed and operated 24/7.

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Impact Study: Although the transition to ASP composting may take 18 months, the proposed permit term is 5 years. Therefore, we request that DEQ require a comprehensive impact study to be performed after the facility has completed the transition to ASP composting.

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February 28, 2019

Warm Regards,
West Family

MIR Naveed

From: Robyn Shaw [REDACTED]
Sent: Monday, March 4, 2019 12:17 PM
To: DEQ NWR Solid Waste Permit Coordinator
Subject: Grimms Fuel Public comment



We appreciate the efforts that DEQ has made to bring Grimm's Fuel into compliance with existing regulations. We are thankful that the DEQ permit is requiring the facility to upgrade to an aerobic system, however, there are a number of areas where the proposed permit does not meet our needs:

Offsite Odor: Considering that DEQ has declined the opportunity to put any measurable odor standard in the permit, we request that the permit require no offsite odor. We will not tolerate nuisance odors in our homes and on our private property. We respectfully request that DEQ replace the vague language of "controls and minimizes odors" with an odor standard that is clear, meaningful, and measurable.

Public Health: We have serious concerns over the potential health impacts from living downwind from this composting operation, and we demand a comprehensive air quality study be performed to determine which airborne contaminants are present in the air. We have a right to know what is in the air that we are breathing. We are concerned about herbicides and pesticides that may be present in the feed stocks. We believe that the regulator and the operator both have a moral and ethical responsibility to prove that the air around the facility is safe to breathe. We request that automated air quality monitoring equipment be installed and operated 24/7.

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Transparency: We request that citizen representatives be included in any and all meetings between DEQ and Grimm's. We request that no last-minute changes be made to the proposed DEQ permit without informing the citizen representatives as to the substance of such changes prior to issuance.

Indoor Composting: In order to protect the health, safety, and property of the people who live and work near the facility, and considering the adverse conditions that we have lived under for the past many years, plus the fact that we are being asked to endure even more dust and odor conditions going forward, we respectfully request that the parties take a serious look at indoor composting. We seek a long-term solution, and we believe that indoor composting is the only solution that can meet the needs of all stakeholders.

Thank you for your consideration in this matter,

Robyn Shaw

MIR Naveed

From: Susan Canedo [REDACTED]
Sent: Thursday, February 28, 2019 5:52 PM
To: DEQ NWR Solid Waste Permit Coordinator
Subject: Grimm's Fuel Proposed Compliance

We appreciate the efforts that DEQ has made to bring Grimm's Fuel into compliance with existing

regulations. We are thankful that the DEQ permit is requiring the facility to upgrade to an aerobic system,

however, there are a number of areas where the proposed permit does not meet our needs:

Offsite Odor: Considering that DEQ has declined the opportunity to put any measurable odor standard in

the permit, we request that the permit require no offsite odor. We will not tolerate nuisance odors in our

homes and on our private property. We respectfully request that DEQ replace the vague language of

"controls and minimizes odors" with an odor standard that is clear, meaningful, and measurable.

Public Health: We have serious concerns over the potential health impacts from living downwind from

this composting operation, and we demand a comprehensive air quality study be performed to determine

which airborne contaminants are present in the air. We have a right to know what is in the air that we are

breathing. We are concerned about herbicides and pesticides that may be present in the feed stocks. We

believe that the regulator and the operator both have a moral and ethical responsibility to prove that the

air around the facility is safe to breathe. We request that automated air quality monitoring equipment be

installed and operated 24/7.

Dust Monitoring: We request that the permit require the installation of offsite sampling equipment to

capture dust and particulates for analysis and measurement. Dust and particulates pose a threat to both

health and private property. We request that the DEQ permit require continuous dust monitoring, with

special attention paid during turning events.

Air Permit: Based on calculations of yearly VOC emissions, we respectfully request that DEQ require

an Air Contaminant Discharge Permit (ACDP) for this facility.

Active Composting: We request that the permit define the difference between active compost piles,

curing compost piles, and finished compost piles. We ask that the permit include a stability test that uses

clear, objective, measurable criteria.

Impact Study: Although the transition to ASP composting may take 18 months, the proposed permit term is 5 years. Therefore, we request that DEQ require a comprehensive impact study to be performed after the facility has completed the transition to ASP composting.

Verification and Audit: We request that the permit describe the process that DEQ will use to double check and confirm the veracity of all parameters measured by the operator. Self regulation is not a feasible solution when it creates a conflict of interest. We request that all test equipment be calibrated and all test procedures be audited.

Flow Rate: Considering that air flow is crucial to maintaining proper temperature and oxygen levels in the active piles, we request that the permit require the operator to monitor, track, and record the air flow rate and pressure drop on all air blowers at the facility.

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Third Party Testing: Considering the high value of neighborhood livability, private property, public health, and the natural environment, it is imperative that all testing and monitoring be performed with the highest level of veracity and accountability. Self regulation is not feasible when it creates a conflict of interest, therefore, we are demanding that all environmental testing and monitoring be performed by an impartial third party.

Transparency: We request that citizen representatives be included in any and all meetings between DEQ and Grimm's. We request that no last-minute changes be made to the proposed DEQ permit without informing the citizen representatives as to the substance of such changes prior to issuance.

Indoor Composting: In order to protect the health, safety, and property of the people who live and work near the facility, and considering the adverse conditions that we have lived under for the past many years,

plus the fact that we are being asked to endure even more dust and odor conditions going forward, we

respectfully request that the parties take a serious look at indoor composting. We seek a long-term

solution, and we believe that indoor composting is the only solution that can meet the needs of all

stakeholders.

The odor is carried as far as our home in South Tualatin, which at times is unbearable.

Susan Canedo

February 28, 2019

Sent from my Verizon, Samsung Galaxy smartphone

MIR Naveed

From: Janet Weber [REDACTED]
Sent: Monday, March 4, 2019 1:20 AM
To: DEQ NWR Solid Waste Permit Coordinator
Subject: Grimm's Fuel Permit

To Whom it May Concern at DEQ Regarding the Proposed Grimm's Fuel Permit Modification:

I appreciate the efforts that DEQ has made to bring Grimm's Fuel into compliance with existing regulations. I'm thankful that the DEQ permit is requiring the facility to upgrade to an aerobic system, however, there are a number of areas where the proposed permit does not meet my, nor my neighbor's needs:

Offsite Odor: Considering that DEQ has declined the opportunity to put any measurable odor standard in the permit, I request that the permit **require NO offsite odor**. I will not tolerate nuisance odors in my homes and on my property. I respectfully request that DEQ replace the vague language of "controls and minimizes odors" with an odor standard that is clear, meaningful, AND measurable.

Public Health: I have serious concerns over the potential health impacts from living downwind from this composting operation, and demand a comprehensive air quality study be performed to determine which airborne contaminants are present in the air. EVERYONE has a right to know what is in the air that we are breathing. I am concerned about any herbicides and pesticides that may be present in the feed stocks that get dropped off at Grimm's. I am also very concerned that Grimm's may be using an accelerator product to their compost to speed up the process of creating compost to be sold to consumers. I believe that the regulator and the operator both have a moral AND ethical responsibility to prove that the air around the facility IS safe to breathe. I would also like to request that automated air quality monitoring equipment be installed and operated 24/7 because I certainly can't keep living like this, especially when the air quality changes day to day and hour by hour and neither can any of my neighbors.

Dust Monitoring: I request that the permit **require** the installation of offsite sampling equipment to capture dust and particulates for analysis and measurement. Dust and particulates pose a threat to both health and private property. I request that the DEQ permit **require** continuous dust monitoring, *with* special attention paid during turning events.

Air Permit: Based on calculations of yearly VOC emissions, I respectfully request that DEQ **require** an Air Contaminant Discharge Permit (ACDP) for this facility.

Active Composting: I request that the permit **define** the difference between active compost piles, curing compost piles, and finished compost piles. I ask that the permit include a stability test that uses clear, objective, measurable criteria.

Impact Study: Although the transition to ASP composting may take 18 months, the proposed permit term is 5 years. Therefore, I request that DEQ **require** a comprehensive impact study to be performed after the facility has completed the transition to ASP composting.

Verification and Audit: I request that the permit describe the process that DEQ will use to double check and confirm the veracity of all parameters measured by the operator. Self regulation **is not** a feasible solution when it creates a conflict of interest. I request that all test equipment be calibrated and *all* test procedures be audited.

Flow Rate: Considering that air flow is crucial to maintaining proper temperature and oxygen levels in the active piles, I request that the permit **require** the operator to monitor, track, and record the air flow rate and pressure drop on all air blowers at the facility.

Input Limit: I request that the permit **require** an engineering study be performed to determine the maximum throughput capacity of the compost system. I request the permit to require that the operator never exceed the maximum throughput capacity of the system.

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Transparency: I request that citizen representatives be included in any and all meetings between DEQ and Grimm's. I request that **no** last-minute changes be made to the proposed DEQ permit without informing the citizen representatives as to the substance of such changes prior to issuance.

Indoor Composting: In order to protect the health, safety, and property of the people who live and work near the facility, and considering the adverse conditions that we all have lived under for the past many years, plus the fact that we all are being asked to endure even more dust and odor conditions going forward, **I respectfully request that the parties take a serious look at indoor composting**. I seek a long-term solution, and I believe that indoor composting is the only solution that can meet the needs of all stakeholders.

Thank you for your time and I hope you will seriously consider including the above statements to make modifications to the proposed Grimm's permit.

Sincerely,
Janet Weber, Tualatin

MIR Naveed

From: Brian Craker [REDACTED]
Sent: Sunday, March 3, 2019 8:22 PM
To: DEQ NWR Solid Waste Permit Coordinator
Subject: Comments on Grimm's Fuel Permit

Thank you for taking the time to listen to our community and find a way forward that works for both Grimm's and our community.

We appreciate the efforts that DEQ has made to bring Grimm's Fuel into compliance with existing regulations. We are thankful that the DEQ permit is requiring the facility to upgrade to an aerobic system, however, there are a number of areas where the proposed permit does not meet our needs:

Offsite Odor: Considering that DEQ has declined the opportunity to put any measurable odor standard in the permit, we request that the permit require no offsite odor. We will not tolerate nuisance odors in our homes and on our private property. We respectfully request that DEQ replace the vague language of "controls and minimizes odors" with an odor standard that is clear, meaningful, and measurable.

Public Health: We have serious concerns over the potential health impacts from living downwind from this composting operation, and we demand a comprehensive air quality study be performed to determine which airborne contaminants are present in the air. We have a right to know what is in the air that we are breathing. We are concerned about herbicides and pesticides that may be present in the feed stocks. We believe that the regulator and the operator both have a moral and ethical responsibility to prove that the air around the facility is safe to breathe. We request that automated air quality monitoring equipment be installed and operated 24/7.

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look at indoor composting. We seek a long-term solution, and we believe that indoor composting is the only solution that can meet the needs of all stakeholders.

MIR Naveed

From: Brett Hamilton [REDACTED]
Sent: Friday, March 1, 2019 11:35 AM
To: DEQ NWR Solid Waste Permit Coordinator
Subject: DEQ Permit for Grimm's Fuel
Attachments: OAPR2019022301.pdf; OAPC2019030101.pdf

Dear Solid Waste Permit Coordinator,

Please find attached the Oregon Air indoor composting proposal and the response from Oregon Air to the Proposed Grimm's Fuel Company Solid Waste Compost Facility Permit Modification. We ask that these documents be included in the current public comments period. Thank you.

Sincerely,
Brett Hamilton

It has become evident to the members of Oregon Air that the outdoor composting system currently under consideration for Grimm's Fuel in Tualatin will generate a significant amount of offsite odor, and therefore not meet the air quality needs of the surrounding community.

Due to the short distance between Grimm's and the surrounding neighborhoods and businesses, we believe that an indoor composting facility, comparable to Alternative 3 in the Green Mountain Technologies report (see attached), is the only solution that will allow Grimm's to continue composting at their current location while also meeting our needs for complete mitigation of dust and odor.

Oregon Air proposes a group field trip to The Compost Factory in Puyallup Washington to see, smell, and learn about indoor composting. In August 2018, Oregon Air tried to arrange for a facility tour but the operators at Waste Connections declined our request.

We believe that the largest composting operation in the Portland metro region should be equipped with the "best system for encroaching neighborhoods and expanding site capacity."

We believe that enclosure requirements and odor performance standards that currently apply to solid waste transfer stations should also be applied to composting facilities.

We understand that this proposal may require new permitting, and we are prepared to offer our assistance to Grimm's in the permitting process in order to make this building a reality. We also understand that this project will require a considerable amount of capital investment, and we are excited for the opportunity to participate in community fundraising efforts to help finance this proposal. We look forward to having a positive working relationship with Grimm's Fuel.

We believe that an indoor composting facility will meet the needs of all stakeholders:

Grimm's: Reduce odor complaints, increase throughput.

Residents: Mitigate dust and odor, improve air quality, protect our health.

Businesses: Protect property values and worker health.

Metro: Increase regional composting capacity, protect the environment.

DEQ: Protect air quality, protect water quality, protect human health.

City of Tualatin: Improve quality of life, allow surrounding development.

Tualatin River: Eliminate rainfall-generated leachate.

Green Mountain Technologies report excerpts from Page 60 (6.1.2.3):

ALTERNATIVE 3: STRUCTURE COVERED AERATED STATIC PILE SYSTEM WITH EXPANDED SITE PERMITTING

This is the Cadillac of composting systems. It is designed to be operated indoors for the first 20 days of composting and after that is operated on an aerated curing floor with a roof only. A biocover must also be utilized during this phase to insulate the surface to achieve PFRP. All aeration pipes are located below a concrete surface, so no pipe handling is required improving the efficiency of pile construction. The aeration system is both positive and negative giving superior temperature control and the oversized biofilters (about one acre) treat all of the indoor air. The piles are turned every 6- to 8-days and re-watered using a mobile compost turner. Finished cured product can be made in 47-days all under a roof so there is no leachate generated from rainfall. It is the best system for encroaching neighborhoods and expanding site capacity. 31,000 cubic yards capacity with a processing capacity of up to 337 tons per day over 40 days. A similar system has been in operation at the Compost Factory in Puyallup Washington since 1999 alongside residential communities and businesses. Due to the constructed enclosure, this system cannot be easily expanded.

Being fully enclosed, for the first 20 days, there is no dust impact from turning and odors are minimized to what the biofilter efficiency can achieve, usually over 95% reduction in odor.

The time line for a building construction project like this can be over 18-months to 2-years (assuming the land use approvals were in place) including engineering, permitting and construction. However, since the location of this facility would be on a separate parcel from the existing system, the transition would be much easier and impact to the business during construction would be minimal.

We appreciate the efforts that DEQ has made to bring Grimm's Fuel into compliance with existing regulations. We are thankful that the DEQ permit is requiring the facility to upgrade to an aerobic system, however, there are a number of areas where the proposed permit does not meet our needs:

Offsite Odor: Considering that DEQ has declined the opportunity to put any measurable odor standard in the permit, we request that the permit require no offsite odor. We will not tolerate nuisance odors in our homes and on our private property. We respectfully request that DEQ replace the vague language of "controls and minimizes odors" with an odor standard that is clear, meaningful, and measurable.

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Input Limit: We request that the permit require an engineering study be performed to determine the maximum throughput capacity of the compost system. We request the permit to require that the operator never exceed the maximum throughput capacity of the system.

Water Quality: We request monthly sampling of groundwater and stormwater for herbicides, pesticides, and all other potential waterborne contaminants. We request that sample wells be used for monitoring groundwater. Contaminated leachate must never be discharged into our local creeks and rivers, and we request monthly testing of nearby creeks and ponds for contamination.

Third Party Testing: Considering the high value of neighborhood livability, private property, public health, and the natural environment, it is imperative that all testing and monitoring be performed with the highest level of veracity and accountability. Self regulation is not feasible when it creates a conflict of interest, therefore, we are demanding that all environmental testing and monitoring be performed by an impartial third party.

Transparency: We request that citizen representatives be included in any and all meetings between DEQ and Grimm's. We request that no last-minute changes be made to the proposed DEQ permit without informing the citizen representatives as to the substance of such changes prior to issuance.

Indoor Composting: In order to protect the health, safety, and property of the people who live and work near the facility, and considering the adverse conditions that we have lived under for the past many years, plus the fact that we are being asked to endure even more dust and odor conditions going forward, we respectfully request that the parties take a serious look at indoor composting. We seek a long-term solution, and we believe that indoor composting is the only solution that can meet the needs of all stakeholders.

MIR Naveed

From: Susie Davis [REDACTED]
Sent: Friday, March 1, 2019 8:59 AM
To: DEQ NWR Solid Waste Permit Coordinator
Subject: DEQ Grimms Permit

We appreciate the efforts that DEQ has made to bring Grimm's Fuel into compliance with existing regulations. We are thankful that the DEQ permit is requiring the facility to upgrade to an aerobic system, however, there are a number of areas where the proposed permit does not meet our needs:

Offsite Odor: Considering that DEQ has declined the opportunity to put any measurable odor standard in the permit, we request that the permit require no offsite odor. We will not tolerate nuisance odors in our homes and on our private property. We respectfully request that DEQ replace the vague language of "controls and minimizes odors" with an odor standard that is clear, meaningful, and measurable.

Public Health: We have serious concerns over the potential health impacts from living downwind from this composting operation, and we demand a comprehensive air quality study be performed to determine which airborne contaminants are present in the air. We have a right to know what is in the air that we are breathing. We are concerned about herbicides and pesticides that may be present in the feed stocks. We believe that the regulator and the operator both have a moral and ethical responsibility to prove that the air around the facility is safe to breathe. We request that automated air quality monitoring equipment be installed and operated 24/7.

Dust Monitoring: We request that the permit require the installation of offsite sampling equipment to capture dust and particulates for analysis and measurement. Dust and particulates pose a threat to both health and private property. We request that the DEQ permit require continuous dust monitoring, with special attention paid during turning events.

Air Permit: Based on calculations of yearly VOC emissions, we respectfully request that DEQ require an Air Contaminant Discharge Permit (ACDP) for this facility.

Active Composting: We request that the permit define the difference between active compost piles, curing compost piles, and finished compost piles. We ask that the permit include a stability test that uses clear, objective, measurable criteria.

Impact Study: Although the transition to ASP composting may take 18 months, the proposed permit term is 5 years. Therefore, we request that DEQ require a comprehensive impact study to be performed after the facility has completed the transition to ASP composting.

Verification and Audit: We request that the permit describe the process that DEQ will use to double check and confirm the veracity of all parameters measured by the operator. Self regulation is not a feasible solution when it creates a conflict of interest. We request that all test equipment be calibrated and all test procedures be audited.

Flow Rate: Considering that air flow is crucial to maintaining proper temperature and oxygen levels in the active piles, we request that the permit require the operator to monitor, track, and record the air flow rate and pressure drop on all air blowers at the facility.

Input Limit: We request that the permit require an engineering study be performed to determine the maximum throughput capacity of the compost system. We request the permit to require that the operator never exceed the maximum throughput capacity of the system.

Water Quality: We request monthly sampling of groundwater and stormwater for herbicides, pesticides, and all other potential waterborne contaminants. We request that sample wells be used for monitoring groundwater. Contaminated leachate must never be discharged into our local creeks and rivers, and we request monthly testing of nearby creeks and ponds for contamination.

Third Party Testing: Considering the high value of neighborhood livability, private property, public health, and the natural environment, it is imperative that all testing and monitoring be performed with the highest level of veracity and accountability. Self regulation is not feasible when it creates a conflict of interest, therefore, we are demanding that all environmental testing and monitoring be performed by an impartial third party.

Transparency: We request that citizen representatives be included in any and all meetings between DEQ and Grimm's. We request that no last-minute changes be made to the proposed DEQ permit without informing the citizen representatives as to the substance of such changes prior to issuance.

Indoor Composting: In order to protect the health, safety, and property of the people who live and work near the facility, and considering the adverse conditions that we have lived under for the past many years, plus the fact that we are being asked to endure even more dust and odor conditions going forward, we respectfully request that the parties take a serious look at indoor composting. We seek a long-term solution, and we believe that indoor composting is the only solution that can meet the needs of all stakeholders.

Sue Davis

From: [Julie Nader](#)
To: [DEQ NWR Solid Waste Permit Coordinator](#)
Subject: Quality of life and Grimms
Date: Sunday, March 3, 2019 5:19:05 PM

Last Tues. night I spoke about my concern that polluted water is getting into our creeks and the Tualatin River. Please see that a third party does the testing of the water to ensure the public's health is protected.

Water Quality: We request monthly sampling of groundwater and stormwater for herbicides, pesticides, and all other potential waterborne contaminants. We request that sample wells be used for monitoring groundwater. Contaminated leachate must never be discharged into our local creeks and rivers, and we request monthly testing of nearby creeks and ponds for contamination.

Thanks to Oregon Air for their consistent, excellent and valuable ideas on how to create a livable community and also encourage Grimm's need to do business.

Thanks for your consideration of my concerns.

Julie Nader

MIR Naveed

From: Ata Saedi [REDACTED]
Sent: Monday, March 4, 2019 10:00 AM
To: DEQ NWR Solid Waste Permit Coordinator
Subject: Comments to Grimm's Proposed Permit Modification
Attachments: Comments to Proposed DEQ Permit.pdf

Thank you for the new and improved draft proposal. Attached please find my comments to the Grimm's Proposed Permit Modification.

Regards, Ted Saedi

Comments on Proposed Grimm's Fuel Co. Solid Waste Compost Facility Permit Modification

From: Ted Saedi

3-4-2019

Thank you DEQ for this new and improved proposed permit modification. We, the close neighbors of Grimm's compost facility are hoping that with the care, attention and follow up of DEQ and other involved agencies, the livability would finally return back to our community.

With all the positive and necessary modifications to this proposal, the following items need to be implemented as well:

1. Odor and dust emission to be confined to Grimm's property boundaries
2. Offensive odor must be clearly specified.
3. Offensive and repeated odor emissions must be consider as a permit violation
4. Vague and subjective phrases like "control and minimizes odors" to be substituted with a measurable, meaningful and enforceable language, like "off-site odor prevention"
5. Monitoring and testing of proper composting criteria and essentials not only be performed by Grimm's trained operators as specified in permit, but, also be performed by a third party expert at least once a month.
6. An Air Permit should be awarded to Grimm's, as the volume of throughput has exceeded the threshold of allowable VOC generation. This has been voiced by nearly 250 Grimm's neighbors who signed the petitions.
7. Throughput tonnage must be defined and be limited to the capability of the facility's handling.
8. Screening apparatus to be required for more professionally designed and structured as not to allow odor and dust beyond the facility's property.

Regards, Ted Saedi

A pony Ridge resident for 22years and a
CASE (Clean Air Safe Environment) organization board member

MIR Naveed

From: Eric D Levenson [REDACTED]
Sent: Saturday, March 2, 2019 4:00 PM
To: DEQ NWR Solid Waste Permit Coordinator
Subject: Grimm's Fuel Compost Comments
Attachments: Grimm's Fuel Compost Comments.pdf

To Whom It May Concern,

Attached are our comments on the Grimm's Fuel Compost Permit.

Sincerely,

Eric Levenson, Myra Tran, Marcus Paschal, Julianne Fetchet

Comments on Grimm's Fuel Compost Permit

Grimm's Fuel Company, located in Tualatin, Oregon, owns and operates a compost facility that produces finished compost, landscape supplies, and soil amendments. They are a full service yard debris drop off and yard products (wood chips, bark, compost and rock products) sales facility. In 2017, Grimm's had received roughly 66,000 tons of incoming feedstock. Currently, the Oregon Department of Environmental Quality (DEQ) has proposed a modification to Grimm's solid waste compost facility permit, looking to require that Grimm's builds infrastructure as well as modify compost practices in accordance with Oregon Revised Statute 459 and Oregon Administrative Rules Chapter 340, Divisions 93-96. The DEQ is inviting public comments on the proposed action, and it is our opinion that Grimm's Fuel Company should comply with this permit modification in accordance with attempts to mitigate odor conditions in neighboring areas. We do, however, have a number of comments regarding DEQ's modification. The following comments will address these concerns.

Food Waste

In their modified solid waste compost facility permit draft, DEQ calls for the removal of Grimm's authorization to receive food waste, coinciding with Grimm's current permit, allowing for receipt of Type 3 feedstock: curbside collected residential food waste mixed with yard debris. With this, we have concerns regarding the perpetuation of methane production within landfills. As methane is over 25 times more potent than carbon dioxide as a greenhouse gas, it is a largely significant contribution to our global greenhouse gas emissions. With Grimm's no longer receiving compostable food waste comes the inevitable increase in food waste within our landfills by default. Composting is a proper method to reduce the release of methane during

organic matter breakdown since the aerobic process of composting does not produce such gas, and a lack of Grimm's authorization to receive food waste will further amplify the amount of greenhouse gases within our atmosphere.

Laws and Regulations

Section 1.4 of the permit addresses water quality and states that no activities should be conducted that adversely affects groundwater. Though NEPA is a federal law, we feel that an EA and possible EIS should be conducted to measure the impact on the groundwater as other agencies, like ODOT, have applied the NEPA process to environmental projects as well.

The goal of the odor minimization plan is self-explanatory, however, we are concerned with other side effects potentially affecting air quality standards under NAAQS. As new air pollutants are added to the proverbial watchlist, how will the updates to the facility handle this? According to the DEQ, it takes four to six months to issue a permit and sometimes longer if they are more complex. Is there any way to speed up this process so as not to include outdated information that could potentially harm the environment? What can be done to alleviate the complaints of the smells in the meantime?

Section 3.1 of the operating conditions in the permit mentions the facilities must not act in a way that "likely" adversely affects groundwater. If a source deemed unlikely contaminates the water as a result of the facility, this could act as a loophole for this facility and others to contaminate the water. This section should be updated or at least introduce a penalty for an "unlikely" way that adversely harms the water.

Government Agents to Consult

One of the primary reasons for the stench reaching as far as three miles from Grimm's Fuel Compost Facility is the height of the compost piles. Before the strong weather inversion on

February 5th, 2018, awareness of Grimm's breaking the law for the height of their compost piles seemed to go unaddressed as there was no change made. In the proposed permit there is a time sensitive requirement for Grimm's to reduce the height to 25 feet by April 30th, 2019 to finally be in accordance with the Oregon Fire Code; however, there is no part in the permit requiring any monitoring of the height until June 30th, 2020. Given the horrible effects the odors have had on this community, there should be a provision in place for the appropriate Fire Department to conduct monthly, and random tests to ensure Grimm's is in compliance with the Oregon Fire Code.

Grimm's should also hold bimonthly meetings with the Oregon Department of Environmental Quality Air Division for the year following the date after the new permit is granted to ensure Grimm's follows the provisions put in place by the permit. At these bimonthly meetings there should be newly provided data from field tests conducted by the Oregon DEQ and these tests should show improvement in air quality over time. By holding Grimm's to these bimonthly meetings with data and using the original tests as a benchmark, this should provide Grimm's with a helpful hand in showing how their steps to elevate standards at that plant are improving living conditions within the surrounding community.

Consulting the Community

The primary reason for issuing a new and stricter permit for Grimm's is because of the horrible air quality conditions the company have brought upon the community. After the February 5th weather incident was the last time Grimm's hosted a public meeting to hear how the community has been impacted by Grimm's business practices. One woman even stated that she had to hold her child's hair back as they threw-up in the family's backyard due to the poor air quality conditions. Because this revised permit is for the community, Grimm's should have to

hold a public hearing every 6 months after the new permit is issued for the proposed 10 years. This should not be a strain on the company given the rarity of how frequently they must meet, and it will have a positive impact on the surrounding communities' trust in the company. Grimm's should agree to these terms as they are a locally owned and environmentally-focused (compost) company.

Technical and Business Practices

Documents for this project that are to be in review are the Grimm's Fuel Company solid waste permit, Oregon's composting rules, and Metro Grimm's website. These documents are all essential to understanding the parameters in review, and to give an understanding on how to create our claims. The permit shows which materials the company will be accepting, with those being type 1 and type 2 feedstocks. Common items in these are yard and garden waste (type 1), also manure and rock products (type 2). The Oregon composting rules put limitations or restrictions on how businesses can operate and where they can operate. Relevant issues in section 340-096-0010 in regards to Grimm's Fuel Company are air quality, proximity to residential areas, and Odor / Hazardous materials.

The technical or business issues for Grimm's Fuel Company is broken down into four categories. They are as simple as the customer dropping off materials, materials sorted and stacked, loaded into a chipper, then loaded onto a delivery truck back to customers. In this process the relevant issues will need to be addressed. When customers drop off materials and there are such hazardous wastes, is there a sufficient process to isolate and keep wastes from contamination of non-hazardous materials? When composting, the need to have materials in a stacked pile in order to initiate the turning process is vital. This is when most odors are leaving the boundary areas in which the company may operate. This turning process which lasts several

days has already been issued and documented 70 formal complaints on February 5th of 2018.

The permit states the permittee needs to submit a revised odor minimization plan, in which many actions need to be taken. To minimize odor, not only does the permittee need to think about time of day, wind direction, and odor potential, but also the size of piles being stacked need to be in question. Though there are already ordinances to keep piles under 25 feet tall, there needs to be revisions to minimize density or lengths of piles to keep active piles below 131 degrees while composting. In the final two stages, issues such as air quality and hazardous waste are of concern. When loading debris or recyclable materials into the chipper to create a final product, how is the air quality effected? Areas of concern are dust in the air and the possibility of a hazardous material being missed in the sorting process. Air quality in this stage is often overlooked and should have a third party authority on site monitoring this process. In the final stage, the final materials are loaded into delivery trucks and taken to final destination. Areas that need to be addressed are trucks carrying hazardous outside of site from products or leftover remnants from hazardous materials. To alleviate this concern, the permittee should add the cleaning of delivery trucks to operating conditions. This can be as simple as having undercarriage of trucks, tires, and tire wells sprayed before leaving the company site.