

# Metro response to public comments

## Proposed license for Grimm's Fuel Company

Metro response to public comments received during the comment period in October through November 2018 regarding proposed license conditions for Grimm's Fuel Company.

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Prepared by Hila Ritter  
January 4, 2019

### BACKGROUND

Grimm's Fuel Company (Grimm's), is a locally-owned and operated Metro-licensed yard debris composting facility that primarily accepts yard debris for composting. In general, Metro's licensing requirements for a composting facility set conditions for receiving, managing, and transferring yard debris and other waste at the facility. The Oregon Department of Environmental Quality (DEQ) also has distinct yet complementary requirements for composting facilities and monitors environmental impacts of facilities to protect air, soil, and water quality. Metro and DEQ work closely together to provide regulatory oversight of solid waste facilities such as Grimm's.

On October 22, 2018, Metro opened a formal public comment period for several new conditions of the draft license for Grimm's. The public comment period closed on November 30, 2018. Metro also hosted a community conversation during that time to further solicit input and discuss next steps. During the formal comment period, Metro received 119 written comments from individuals and businesses (attached). Metro received an additional six written comments via email after the comment period closed at 5 p.m. on November 30, which did not become an official part of the record.

After the comment period closed, members of the Tualatin community requested that Metro extend the term of Grimm's current license for an additional two months to allow the public an opportunity to review the new proposed license in its entirety before it is issued. On December 21, 2018, Metro extended the term of Grimm's current license by two additional months. The current license (L-043-18A) expires on February 28, 2019.

This memo summarizes the written comments that Metro received during the formal comment period and provides Metro's response to those comments. All of the written comments that were received are summarized by topical categories and the full text of each comment is attached. Grimm's also submitted to Metro a general response to the comments, which is also attached.

### PUBLIC NOTICE AND OPPORTUNITY TO COMMENT

On October 22, 2018, Metro issued public notice of the proposed license conditions and provided an opportunity for the public to submit comments. A notice was mailed to 1,646 property owners, businesses and residents located within approximately one mile of the Grimm's facility. Notice was also posted on the Metro website and emailed to a list of Metro-area stakeholders that have a general interest in solid waste issues, as well as all individuals who have submitted to Metro an odor, dust or other report about Grimm's in the last five years. The public comment period ended on November 30, 2018. Additionally, Metro staff discussed the proposed license conditions at a Metro-hosted community conversation event held on October 30 at the Juanita Pohl Center in Tualatin. Approximately 50 people attended the event. Metro received 119 written comments from 113 individuals during the public notice period (see attached). Thirty-one of the above-mentioned comments specifically endorsed position

statements of the neighborhood advocacy groups, Clean Air Safe Environment (CASE) and Oregon Air. Metro has worked with CASE since 2017 to better understand its position and address its questions and concerns. Metro has worked in a similar manner with Oregon Air upon its establishment in June 2018.

In response to the input that Metro received during the public comment period, Metro revised its draft license conditions and will release a proposed license in its entirety for public review and comment before it is granted. This public review period for the proposed license will begin on January 4, 2019, and end on February 5, 2019. During that time, Metro will host another meeting with community leaders and DEQ to review the proposed license. Additionally, Metro will participate in an upcoming DEQ public engagement meeting in Tualatin to discuss modifications to Grimm's DEQ permit in early 2019.

In response to the feedback received during the public comment period which commenced in October, Metro revised the draft conditions that were initially released. The new draft license is available on Metro's website at [www.oregonmetro.gov/grimms](http://www.oregonmetro.gov/grimms), as of January 4, 2019. Metro is proposing specific additional changes in the new license which include:

- Increasing the minimum oxygen level required in aerated static piles (ASPs) to ten percent at all times;
- Requiring immediate corrective action if the oxygen levels drop below the ten percent threshold; and
- Requiring the complete conversion of the site to the aerated static pile composting method by July 1, 2020.

In addition, the license sets certain penalties if Grimm's does not comply with timeline requirements. For example, if Grimm's does not convert to the aerated static pile composting method by July 1, 2020, then Metro may suspend or restrict Grimm's authorization to accept incoming feedstocks until the aerated static pile system is in place, in addition to any monetary penalties.

## **SUMMARY OF WRITTEN PUBLIC COMMENTS AND METRO'S RESPONSE**

The comments that Metro received are summarized in ten general categories. Metro's responses address each general category in no particular order.

### **1. Land Use** – Metro received a range of comments about land use issues including that:

- Grimm's was operating before residential housing came into the area and it should be allowed to continue.
- Compost facilities should not be allowed near residential housing.

#### Metro's response #1 – Land use:

Metro is tasked with planning, management, and oversight of the region's solid waste system. It has an obligation to the public to ensure that the waste intended for reuse, recycling and other purposes is handled properly and sent to appropriate markets, and that all other waste is safely managed and disposed. In carrying out its oversight responsibilities, Metro balances the need to preserve yard debris composting capacity in or near the region with the needs of the local communities that live and work

near these facilities. Metro primarily relies on local governments, such as the city of Tualatin, for land use determinations and DEQ for environmental oversight.

According to the city of Tualatin, Grimm's is located in a "Heavy Manufacturing" zone and it holds the necessary land use approval for yard debris composting operations. Grimm's began its composting operations in Tualatin in the 1970s. Some nearby homes were there prior to being annexed into the City and were included into a subdivision and a mobile home park development. Over time, the residential density increased while Grimm's operations intensified by accepting larger volumes of yard debris. Grimm's site was annexed into the City before that of the neighboring subdivision, mobile homes, and apartments. In the 1990s, the city of Tualatin allowed residential uses near the Grimm's site at the request of a land developer.

**2. Grimm's is a good neighbor, or should be a good neighbor.**

- Some neighbors have reported a largely positive relationship with Grimm's.
- Other neighbors have reported that livability in nearby adjacent areas has decreased due to Grimm's.

Metro response #2 – Neighbor:

Grimm's management performs regular odor monitoring, and investigates or otherwise responds to all odor complaints received by the facility from Metro or DEQ in a timely fashion. Historically, Grimm's has attempted to wait for optimal weather conditions to schedule activities that are more likely to generate odor. Grimm's also attempts to provide notice to the local community when piles are scheduled to be turned or other off-site odor impacts are likely to occur.

In the draft of the new proposed license, Metro requires that Grimm's take additional steps to engage with the local community in a more proactive manner. In particular, the license requires Grimm's to develop a "Community Engagement Plan" to outline how it will engage nearby residents and businesses during the conversion of the site to aerated static pile composting and into the future. A Community Engagement Plan must be submitted to Metro by May 1, 2019. To further develop the plan, Metro has shared some resources with Grimm's for developing and implementing a plan, including contact information for a professional mediator, Good Neighbor Agreements between other facility operators and their communities, and Green Mountain Technology's (GMT's) report which describes recommendations for community engagement.

**3. The proposed license conditions were too stringent and difficult to meet in the time frame proposed.**

- The timeline for implementation of a new composting system are unrealistic considering engineering, permitting, construction, and availability of equipment and workers.
- Grimm's is being treated unfairly.

Metro response #3 - Proposed license conditions too stringent:

To better inform any potential license changes, Metro relied on GMT to independently assess Grimm's composting operations and identify best management practices and recommendations for malodor mitigation opportunities. GMT was chosen by a review committee that included representatives of Grimm's, government agencies and the local community. In addition to hiring a third party expert to

evaluate Grimm's operation, Metro participated in a series of public and individual meetings with community groups in an ongoing effort to understand and respond to the needs of the community.

Metro solicited comments from several unaffiliated compost facility operators about the draft general performance requirements. Metro used all these sources, in addition to the legal counsel of the Office of Metro Attorney to propose practical conditions in the Grimm's license. Metro provided technical assistance to Grimm's by using GMT to consult for operational improvements. In consideration of all of this input, Metro is proposing a six-month extension to the timeline for Grimm's to achieve a 14-foot maximum pile height (extending the timeline to July 1, 2020) and requiring that Grimm's fully complete an aerated static pile composting system by that time. If Grimm's does not meet this timeline, Metro may prohibit or limit the acceptance of incoming feedstock, or take other enforcement action as appropriate. The proposed date was selected, in part, based on the construction timeline submitted to Metro by GMT during the public comment period (see attached). GMT has been hired by Grimm's to design an aerated static pile composting system.

#### **4. Economic impacts**

- The proposed requirements will have a negative economic impact on Grimm's, such as causing the facility to close.
- The proposed requirements will result in increased costs for residential and/or commercial customers of Grimm's.
- Metro needs to provide financial resources to facilitate the conversion of the facility to an aerated system and/or take on the management of the region's yard debris.
- Grimm's provides economic benefit to the community as an employer, benefactor to non-profits such as Home Owner Associations and Boy Scouts, and local recycling infrastructure.
- Concerns regarding home values due to Grimm's negative neighborhood impacts.

#### Metro Response #4 - Economic impacts:

It is not Metro's intent to cause any facility to close — including Grimm's — due to regulation. Yard debris composting is valued as an important method to recover and recycle organic materials. Grimm's currently processes about 60 percent of the Metro region's yard debris, so it plays a very important role in the region's composting system. Metro balances the needs of the people of the region with the need to preserve composting capacity in or near the region. This is one of the reasons Metro hired GMT to objectively assess Grimm's operation and recommend operational improvements. The solid waste system in the Metro region is made up of facilities that are owned and operated by public agencies (like Metro Central and Metro South Transfer Stations) and others that are privately owned and operated, (like Grimm's). At this time, Metro does not regulate rates that private facilities charge their customers, and is working to increase rate transparency at all facilities and throughout the region.

The functions of regional solid waste system are implemented by Metro, cities and counties, and many private for-profit businesses and non-profit organizations. This sharing of responsibilities means that Metro has a strong interest in the success of the private sector at creating, expanding, preserving and broadening efforts that advance waste prevention, reuse, recycling and energy recovery. In December 2017, the Metro Council established a new Investment and Innovation grant program to support this interest through the granting of funds to businesses and non-profit organizations involved in these efforts and to help foster economic opportunities for people who have historically been left out of the garbage and recycling system, particularly communities of color. Metro staff encourage Grimm's to apply in 2018 for the first round of grants. Grimm's submitted a pre-proposal and was invited to submit

a full proposal, but withdrew its full application before it could be considered, stating that it was “not prepared to enter a competitive proposal for this funding cycle.” Metro is planning on awarding grants again in 2019 and 2020, and Grimm’s may apply for funding during those grant cycles. For more information visit: [www.oregonmetro.gov/investmentandinnovation](http://www.oregonmetro.gov/investmentandinnovation)

**5. The proposed license conditions needed to be stronger or needed to be supplemented with additional requirements.** Suggestions for requirements included the following:

- Require more stringent oxygen action levels.
- Require zero tolerance for offsite odors and dust.
- Reduce incoming feedstocks until the new system has met odor and dust requirements for one year.
- Require the operator to monitor, track and record the air flow rate and pressure drop on all air blowers at the facility.
- Increase penalties for operator being out of compliance.
- Increase performance monitoring requirements.
- Set objective, measureable criteria in performance and odor monitoring.
- Require a third-party odor monitoring service and/or provide the equipment and training for local residents to perform odor monitoring.
- Concerns that not all of GMT’s recommendations being implemented.
- One or more of the proposed license conditions need to be implemented within a shorter timeline.
- Reduce term of license.

Metro’s response #5 - proposed license conditions need to be more stringent:

Grimm’s current large static pile method of composting is insufficient to control odors as was documented by GMT and noted by the community. While the decomposition of organic material will always generate some odor, it is difficult to quantify the composition of odors to any high degree. Therefore, Metro’s licensing of compost facilities, including Grimm’s, requires operators to control and minimize these odors. Metro intends to evaluate whether regulatory standards should be established for off-site malodors and consider their imposition at a later point in time. Based on a review of comments, Metro recommends the following modifications to the new proposed license:

- Increasing the oxygen level requirements that should be maintained from five percent to ten percent minimum or when a corrective action must be taken.
- Significantly increased performance monitoring requirements, and penalties for noncompliance.
- Requiring the complete conversion of Grimm’s entire active composting operation to the aerated static pile composting method by July 1, 2020.
- Requiring ongoing continuing education of Grimm’s employees to ensure that qualified operators are implementing current industry best practices.
- Issuing Grimm’s license for nearly a five-year term. It is critical to provide a stable regulatory status in order for Grimm’s to demonstrate longevity to secure financing or loans for operating expenses and making the significant capital improvements required by this license.

Metro’s current and near term focus at Grimm’s is on requiring operational changes, including: reducing the amount of material on site, lowering pile heights, improving oxygen levels in the piles, using bio filters, and aerating composting piles. Metro believes that properly implemented operational changes made in a timely manner will result in less odor. It is critical to keep the Grimm’s operation focused on

implementing these operational changes and meeting the timelines set forth in the proposed license. In addition, it is premature to require the measurement of offsite odors or to rely on a particular olfactometer at this time. Metro and DEQ are responsible for regulatory oversight of composting facilities and will continue to perform facility inspections and complaint investigations in neighboring areas surrounding the facility. As further research is conducted, Metro may propose a regulatory enforcement standard in the future that could include a preferred olfactometer device.

In addition, Metro evaluated GMT's recommendations and incorporated all of them into the proposed license, with the exception of four recommendations:

- a. The license does not address relic objects at the site because Grimm's has already removed these objects to Metro's satisfaction prior to the release of the proposed license conditions.
- b. The license does not designate an odor monitoring tool at this time. Metro and DEQ are both aware of the limitations of the Nasal Ranger because of its use elsewhere near the region. It is premature to implement an odor standard or device until further evaluation is conducted.
- c. The license does not require Grimm's to adopt a mitigation strategy menu. While this document is a helpful resource for compost operators to diagnose issues, it is not an adequate regulatory tool.
- d. The license does not include a requirement about consistency of land use options because Metro does not normally make zoning decisions. That responsibility is generally the purview of local governments. In the case of Grimm's, Metro deferred to the city of Tualatin for land use determinations.

#### **6. Composting capacity at Grimm's and in the Metro region.**

- If Grimm's closes or limits incoming feedstock, increased transportation to deliver materials elsewhere will increase emissions and have greater negative health impacts.
- If yard debris is landfilled or burned rather than composted there will be increased negative environmental and health impacts.
- Tualatin and the surrounding areas suffer the impacts of Grimm's, if Grimm's closes other areas will bear increased burdens of impacts.
- There is limited composting capacity in or near the region and if it doesn't go to Grimm's, where will it go?

#### Metro Response #6 – composting capacity:

The Metro region is growing in population and increasing the demands on the recycling and solid waste infrastructure. Metro will be challenged to continue to manage yard debris locally as the population and density increases. Metro is committed to working with existing compost facilities to ensure they operate in a manner that is benefitting the community, and overseeing the public-private solid waste system for the region to achieve public benefits of the highest and best use of materials and, when needed, their safe disposal. Since early 2017, Metro has been working with communities across the region to develop the 2030 Regional Waste Plan as both a vision for greater Portland's garbage and recycling system and a blueprint for achieving that vision. For more information visit:

[www.oregonmetro.gov/regionalwasteplan](http://www.oregonmetro.gov/regionalwasteplan)

#### **7. Metro needs to renew Grimm's license:**

- Grimm's provides a valuable service to residents and businesses.

- Grimm’s facility causes odors that are minimal and/or do not negatively impact the commentator.
- Grimm’s facility causes odors that are problematic but the proposed requirements, and in some cases stronger requirements, are expected to help.

Metro’s response #7 – renew Grimm’s license:

Metro is proposing new license conditions to better address community concerns, and is releasing the draft license in its entirety on January 4, 2019, for public comment before it is granted.

On December 21, 2018, Metro extended Grimm’s current license for two additional months, to expire on February 28, 2019, with no additional changes. Metro will consider written recommendations it receives during the comment period to inform the new proposed license that will be issued to Grimm’s in February with an effective date of March 1, 2019. The new proposed license has nearly a five-year term and is set to expire on December 31, 2023. Metro is proposing a five-year license term to provide greater authorization certainty in order for Grimm’s to make the required operational changes.

**8. Metro’s community involvement in the regulation and enforcement of Grimm’s needs to increase:**

- Request that Metro provide the tools and resources needed for citizen odor monitoring.
- Citizen input being required for approval of both the initial Operating Plan and updates to the Operating Plan, and citizen representation required at all meetings between Metro and Grimm’s.

Metro’s response #8 – community involvement in regulation and enforcement:

Metro employs two full time solid waste facility inspectors who are trained in environmental compliance and tasked with monitoring the 50+ solid waste facilities authorized by Metro in and around the region. The inspectors generally perform seven or eight inspections of a facility annually. When greater attention at a facility is merited, Metro performs an increased amount of both announced and un-announced facility inspections and complaint investigations in neighboring areas surrounding the facility.

As described above, Metro’s current and near term focus at Grimm’s is on successful implementation of appropriate and timely operational changes which, if properly implemented, will result in fewer odors. It is premature to require the measurement of offsite odors and the use of a particular olfactometer to perform this task. Metro will continue to review and assess operating plans for effectiveness and retain approval authority. Metro will continue to meet with regulated entities, and invite public participation when appropriate. This includes, but is not limited to, public comment opportunities for new solid waste licenses and license renewals but does not normally include reviews of a facilities operations plan.

**9. Metro needs to do more work to investigate the negative health impacts that could arise from operation of Grimm’s under existing and/or the proposed requirements:**

- Emissions from composting should be monitored.
- Odors generated at Grimm’s and/or dust are a health concern.
- Odors generated at Grimm’s and/or dust are exaggerated by a small group of people and/or people who are new to the area.

Metro’s response #9 – health impacts of compost:

Metro has broad authority over solid waste and relies on its government partners to provide oversight for items beyond Metro's authority. Metro's authority at Grimm's is specific to the types and amounts of wastes (primarily yard debris) that Grimm's accepts and manages. In the case of health impacts from compost operations, Metro has relied on the Oregon Health Authority (OHA), Washington County Health Department, and DEQ to determine what, if any, health risks exist due to exposure to compost odors and/or dust. Metro understands that the local and state health agencies are planning to release a FAQ (Frequently Asked Questions) document within the next few weeks in response to some of the concerns raised by the community.

**10. Comments describing odors:**

- Odors coming from the facility are negatively impacting people near Grimm's, including embarrassment and health impacts or concerns (21 percent of all comments)
- Odors occur but are not negatively impacting people near Grimm's (18 percent of all comments)
- Odors have increased in the past 3 years or less because of Grimm's (8 percent of all comments)
- Odors and/or dust cause negative health concerns and/or impacts (8 percent of all comments)
- Odor complaints are exaggerated from a small vocal minority and/or people new to the area (32 percent of all comments)

Metro's response #10 - odors: Metro understands odors can cause emotional and physical responses which can be pleasant or unpleasant and that some people might be more sensitive to odors than others and have stronger physical or emotional response to bad odors. As stated previously, Metro is requiring the complete conversion of Grimm's to the aerated static pile composting method. Metro is further requiring Grimm's to participate in ongoing continuing education to ensure that it has qualified operators implementing current industry best practices for mitigating odors. Metro finds that Grimm's conversion to the aerated static pile composting method will significantly address the odor concerns raised about the facility's operation. Operational changes that are properly implemented in a timely manner will result in less odor, and the current emphasis is to require the successful implementation of these changes and meeting the timelines set forth in the proposed license.

**STAFF RECOMMENDATION**

The current license for Grimm's expires on February 28, 2019. It was extended by two months from its original expiration date of December 31, 2018 to allow additional time for the public to review and provide input on a revised, standard-term license. Metro will consider new and additional comments from the public during the comment period ending at 5 p.m. on February 5, 2019 to better inform the license conditions. Metro intends to make any necessary changes to the new proposed license and issue a renewed license in late February, 2019 with an effective date of March 1, 2019.

Attachment  
HR  
Queue



**From:** [Metro Solid Waste Compliance](#)  
**To:**  
**Subject:** RE: Grimm's Recycling Comments  
**Date:** Tuesday, October 30, 2018 9:17:00 AM

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Hello,

Thank you for your comment. Metro will respond to comments in the staff report, which will be available online as an update to the [Grimm's Fuel Company public notice webpage](#) after the close of the public comment period.

Metro is hosting a [community conversation](#) regarding the proposed amendments to the license tonight, October 30, at 6 p.m. at the Juanita Pohl Center in Tualatin.

Thanks,

\*Hila

**Hila Ritter**

Solid Waste Authorization Coordinator  
Property and Environmental Services

*My gender pronouns: she, her, hers.*

Metro | [oregonmetro.gov](http://oregonmetro.gov)

[600 NE Grand Ave.](#)

Portland, OR 97232-2736

[503-797-1862](tel:503-797-1862)

**From:**

**Sent:** Friday, October 26, 2018 5:30 PM

**To:** Metro Solid Waste Compliance <SWICC@oregonmetro.gov>

**Subject:** Grimm's Recycling Comments

I have lived near Grimm's Recycling Center for 50 years. I am concerned that Grimm's Recycling Center which provides an essential service to the surrounding communities is in jeopardy.

What is happening with Grimm's Recycling Center seems to be yet another example of outside influence into our community. Major changes in Oregon have been shaped by people who have moved to the state or do not even live in Oregon.

The driving force behind potential changes with Grimm's Recycling is spearheaded by individual(s) who moved to Oregon from California. These folks have made accusations that the smell has caused sickness.

The natural decomposition of the material at Grimm's Recycling Center is a natural occurrence and is safe for the environment. The proposal for building to house the compost and composting machines does not make sense. I would like to know how much has been spent to get to this point and is this the best way to serve the community? What is the cost to the community if these changes are implemented? Is there really a need to made changes? Would there be a push to make changes if the neighbors would not be complaining?

I live in this community and the changes will have an effect on me. I am not ignoring safety to the community and any changes that are needed to comply to the standards of recycle facilities. However, I am tired of people who move to Oregon and drive changes based upon their personal agenda. Everyone who lives near Grimm's knows that there are times when natural smells may be omitted. Maybe those folks should have looked elsewhere this is an issue.

I urge you to make your decisions based on the standards for these facilities and not the complaints of individuals.

Nick Frank  
Tigard Oregon

**From:** [Metro Solid Waste Compliance](#)  
**To:**  
**Subject:** RE: Grimm's Fuel Company  
**Date:** Tuesday, October 30, 2018 9:18:00 AM

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Hello,

Thank you for your comment. Metro will respond to comments in the staff report, which will be available online as an update to the [Grimm's Fuel Company public notice webpage](#) after the close of the public comment period.

Metro is hosting a [community conversation](#) regarding the proposed amendments to the license tonight, October 30, at 6 p.m. at the Juanita Pohl Center in Tualatin.

Thanks,

\*Hila

**Hila Ritter**

Solid Waste Authorization Coordinator  
Property and Environmental Services

*My gender pronouns: she, her, hers.*

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**From:**  
**Sent:** Monday, October 29, 2018 10:38 AM  
**To:** Metro Solid Waste Compliance <[SWICC@oregonmetro.gov](mailto:SWICC@oregonmetro.gov)>  
**Subject:** Re: Grimm's Fuel Company

Hello Metro,

My name is Craig Prunty, property owner of Cipole Road holdings, located at 19785 SW Cipole Road, Sherwood, OR 97140. I also am the owner of All Oregon Nursery, LLC and All Oregon Landscaping, INC. that operates at this location. Grimm's fuel is an asset to the community! Their recycling is a necessity to the large amount of "local landscape maintenance company's, construction companies, and the local neighborhood. The service they offer with taking yard waste and turning it into a viable product that is re-incorporated into the yard is a necessity. Please extend their license!

Sincerely,

*Craig Prunty*

**From:** [Metro Solid Waste Compliance](#)  
**To:**  
**Subject:** RE: Grimm's Fuel Company: comments for meeting on 11/30/18  
**Date:** Tuesday, October 30, 2018 9:18:00 AM

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Hello,

Thank you for your comment. Metro will respond to comments in the staff report, which will be available online as an update to the [Grimm's Fuel Company public notice webpage](#) after the close of the public comment period.

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Thanks,

\*Hila

**Hila Ritter**

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Property and Environmental Services

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**From:**  
**Sent:** Monday, October 29, 2018 4:13 PM  
**To:** Metro Solid Waste Compliance <[SWICC@oregonmetro.gov](mailto:SWICC@oregonmetro.gov)>  
**Subject:** Grimm's Fuel Company: comments for meeting on 11/30/18

My name is Craig Brown. I live at 12904 SW Bedford Street, Tigard Oregon. My house backs up to the Tualatin river and I am fairly close to Grimm's Fuel Company. I have lived there since 1993. It is my perspective that you need to live in harmony with your neighbors if at all possible. We moved into the area in 1993 fully aware of Grimm's. They have been there much longer than we have lived in our home so we took it as a given that from time to time we would smell compost. If either my wife or I had issues with the smell of occasional compost we would have not moved into the neighborhood. I find Grimm's to be a good neighbor. They are law abiding and conduct a business that is good for our environment. I find it hard to contemplate that various governmental agencies are trying to implement changes on Grimm's that will cost Grimm's an excessive amount of money. This appears to be based on complaints from a few neighbors. My question goes out to the neighbors who are complaining:

**If you do not like the smell of compost, why did you move into a location where there was an active compost business?**

If makes little sense to force Grimm's to bow down based on the complaints of a few new neighbors

who have issues with an occasional smell of compost. We need to learn to coexist without forcing changes upon one another. It is not fair for Grimm's to have to foot the bill on behalf of a few complaining neighbors. We have zero complaints or issues with Grimm's.

Thank you for reviewing my comments.

Portland



**From:** [Metro Solid Waste Compliance](#)  
**To:**  
**Subject:** RE: Grimms Odor  
**Date:** Tuesday, October 30, 2018 9:18:00 AM

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Hello,

Thank you for your comment. Metro will respond to comments in the staff report, which will be available online as an update to the [Grimm's Fuel Company public notice webpage](#) after the close of the public comment period.

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\*Hila

**Hila Ritter**

Solid Waste Authorization Coordinator  
Property and Environmental Services

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**From:**  
**Sent:** Monday, October 29, 2018 2:56 PM  
**To:** Metro Solid Waste Compliance <[SWICC@oregonmetro.gov](mailto:SWICC@oregonmetro.gov)>  
**Subject:** Grimms Odor

Hi there,

I live in King City near Deer Creek Elementary School. It is usually impossible to open windows on a nice, sunny day because of the horrendous stench. I have smelled it as far as out on 124th and Tualatin-Sherwood road. I'm not sure how long they have been doing this but I am fearful of what we could be breathing in. I have lived in this home since 2005 and it has gotten increasingly worse over the years. I have heard that Grimms was asked to make changes to lessen the effects on the residences of Tigard/King City/Tualatin and I have not noticed any changes. I hope there is a way to come to an agreement so that they may conduct their business while keeping the air clean for our residents.

Nancy Gilman  
13195 SW Shakespeare ST  
King City, OR 97224

**From:** [Metro Solid Waste Compliance](#)  
**To:**  
**Subject:** RE: Grimm's Fuel Company  
**Date:** Tuesday, October 30, 2018 2:43:00 PM

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Hello,

Thank you for your comment. Metro will respond to comments in the staff report, which will be available online as an update to the [Grimm's Fuel Company public notice webpage](#) after the close of the public comment period.

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[600 NE Grand Ave.](#)

Portland, OR 97232-2736

[503-797-1862](tel:503-797-1862)

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**From:**  
**Sent:** Tuesday, October 30, 2018 12:56 PM  
**To:** Metro Solid Waste Compliance <SWICC@oregonmetro.gov>  
**Subject:** Grimm's Fuel Company

RE: Grimm's Fuel Company

I feel that Grimm's Fuel is a valuable recycling asset to our community. Grimm's is used by many landscapers, home owners and golf course such as us. I do hope that their license is extended. I am concerned about the number of restrictions that the proposed agreement would put on them. The excessive restrictions would undoubtedly increase costs for the end users and possibly jeopardize Grimm's business.

I understand dust control and fire safety but the odor that a few people talk about is certainly not a problem and never has been.

If you would like further comments I can be reached at

Thank you,

*Randy Shults, CGCS*

Certified Golf Course Superintendent  
Tualatin Country Club  
Tualatin, Oregon



**From:** [Metro Solid Waste Compliance](#)  
**To:**  
**Subject:** RE: Grimms  
**Date:** Friday, November 02, 2018 11:41:00 AM

---

Hello,

Thank you for your comment. Metro will respond to comments in the staff report, which will be available online as an update to the [Grimm's Fuel Company public notice webpage](#) after the close of the public comment period.

Thanks,

\*Hila

**Hila Ritter**

Solid Waste Authorization Coordinator  
Property and Environmental Services  
*My gender pronouns: she, her, hers.*

Metro | [oregonmetro.gov](http://oregonmetro.gov)

[600 NE Grand Ave.](#)

Portland, OR 97232-2736

[503-797-1862](tel:503-797-1862)

---

**From:**  
**Sent:** Wednesday, October 31, 2018 8:05 PM  
**To:** Metro Solid Waste Compliance <[SWICC@oregonmetro.gov](mailto:SWICC@oregonmetro.gov)>  
**Subject:** Grimms

Greetings,

I have to say that it is so ridiculous to keep garbage and debris pickup inexpensive for the taxpayer and also profitable for a business with these crazy restrictions. The people that are complaining are ignorant and likely are not willing to pay the extra fees but are so called recyclers.

Get Real government. Stop listening to the few complainers and think and manage big picture.

Brenda A. Quint Gaebel  
TAX PAYER

**From:** [Metro Solid Waste Compliance](#)  
**To:**  
**Subject:** RE: Grimm's Fuel Company - Proposed Operational Amendment  
**Date:** Monday, November 05, 2018 4:16:00 PM

---

Hello,

Thank you for your comment. Metro will respond to comments in the staff report, which will be available online as an update to the [Grimm's Fuel Company public notice webpage](#) after the close of the public comment period.

Thanks,

\*Hila

**Hila Ritter**

Solid Waste Authorization Coordinator  
Property and Environmental Services

*My gender pronouns: she, her, hers.*

Metro | [oregonmetro.gov](http://oregonmetro.gov)

[600 NE Grand Ave.](#)

Portland, OR 97232-2736

[503-797-1862](tel:503-797-1862)

**From:**

**Sent:** Sunday, November 04, 2018 2:19 PM

**To:** Metro Solid Waste Compliance <[SWICC@oregonmetro.gov](mailto:SWICC@oregonmetro.gov)>

**Subject:** Grimm's Fuel Company - Proposed Operational Amendment

I would like this statement to be considered public record, and represent my position regarding the upcoming Grimm's Fuel facility's license extension amendment.

We moved to the Edgewater neighborhood in 2007. Along with all of the new neighbors, we spent most of our leisure time outside, enjoying each other in our yards, or the in the King City park. I also enjoy having most of my windows open all throughout the year to circulate fresh air into my home.

It has been a progressive disappointment over the last several years that some days it smells like you are sitting next to a trash can. We have had to move/postpone parties. Some days we have chosen to be inside, rather than enjoying this beautiful weather outside. I'm tired of apologizing and explaining to visitors what "that smell" is. I'm also aggravated that I have to keep my windows closed on some of the most perfect weather days. Some days we get lucky and the wind changes direction, but it's not often.

I had hoped that Grimm's Fuel would have chosen to be a good community neighbor and fix this problem proactively. The surrounding Cities should be weary that it also affects the quality of life in areas they are attempting to grow the tax base.

Thank you for supporting the views of the people who actually live here, and are affected by it personally. It's not just an agenda item to us - it affects our daily lives.

Kind regards,

Victoria Foster

**From:** [Metro Solid Waste Compliance](#)  
**To:**  
**Subject:** RE: Grimm permit  
**Date:** Friday, November 09, 2018 2:44:00 PM

---

Hello,

Thank you for your comment. Metro will respond to comments in the staff report, which will be available online as an update to the [Grimm's Fuel Company public notice webpage](#) after the close of the public comment period.

Thanks,

\*Hila

**Hila Ritter**

Solid Waste Authorization Coordinator  
Property and Environmental Services  
*My gender pronouns: she, her, hers.*

Metro | [oregonmetro.gov](http://oregonmetro.gov)

[600 NE Grand Ave.](#)

Portland, OR 97232-2736

[503-797-1862](tel:503-797-1862)

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

From:

Sent: Friday, November 09, 2018 1:21 PM

To: Metro Solid Waste Compliance <[SWICC@oregonmetro.gov](mailto:SWICC@oregonmetro.gov)>

Subject: Grimm permit

Hi;

I am not in favor of renewing Grimm's license for composting without further mitigations. I live in SW Beaverton (Murrayhill area), and there were a number of days last winter and spring where the odor was quite noticeable. This past summer has been generally OK. But as it happens, today the odor has returned with force, blanketing at least my local area. I have run errands in my car, and it was readily apparent at every stop and also while I was driving.

I realize that this could impact Metro recycling costs, but without changes, this problem will only worsen. More homes, more debris to be composted, etc.

Please don't let this go unchecked.

Respectfully,

Dave Hardman, homeowner  
16230 SW Falcon Dr  
Beaverton, OR 97007

**From:** [Hila Ritter](#)  
**To:**  
**Cc:** [Duane Altig](#); [Eric Crandall](#)  
**Subject:** RE: Prolonged BAD Odor All Day 11-9-18  
**Date:** Friday, November 09, 2018 4:12:00 PM

---

Hello Julie,

Thank you for your comment. Metro will respond to comments in the staff report, which will be available online as an update to the [Grimm's Fuel Company public notice webpage](#) after the close of the public comment period.

Thanks,

\*Hila

**Hila Ritter**

Solid Waste Authorization Coordinator

Property and Environmental Services

*My gender pronouns: she, her, hers.*

Metro | [oregonmetro.gov](http://oregonmetro.gov)

[600 NE Grand Ave.](#)

Portland, OR 97232-2736

[503-797-1862](tel:503-797-1862)

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

From:

Sent: Friday, November 09, 2018 4:07 PM

To: Hila Ritter <[Hila.Ritter@oregonmetro.gov](mailto:Hila.Ritter@oregonmetro.gov)>; Duane Altig <[Duane.Altig@oregonmetro.gov](mailto:Duane.Altig@oregonmetro.gov)>;

Cc:

Subject: Prolonged BAD Odor All Day 11-9-18

Hi Duane and Hila,

When I left for work this morning, the odor from Grimm's was bad and now that I've returned home, it continues to be BAD! Sure hope you enjoy an odorless weekend because we won't have that luxury in Pony Ridge.

Seemingly after the Metro/DEQ meeting, the expectation from those government agencies is that the residents of Pony Ridge need to continue to endure this horrid odor indefinitely.

In my opinion the few restrictions that were applied to Grimm's license will do little to nothing to litigate the foul odor.

Just as Metro and DEQ keep repeating that "scientifically" you can not prove that there are health concerns related to the foul odor and dust; you also can't prove scientifically that pile height will reduce the odor.

I believe with proper equipment, the odor can be eliminated. Other compost businesses are doing

just that. Grimm's is not even willing to apply for a grant from you to upgrade and you are looking the other way.

The license needs to be short term provisional and not granted for a length of four years. The vague language needs to be corrected to more precise language.

Please add this email to the public comments you are taking until November 30th.

Thank you,  
Julie

**From:** [Metro Solid Waste Compliance](#)  
**To:**  
**Subject:** RE: Grimm's  
**Date:** Wednesday, November 14, 2018 9:06:00 AM

---

Hello,

Thank you for your comment. Metro will respond to comments in the staff report, which will be available online as an update to the [Grimm's Fuel Company public notice webpage](#) after the close of the public comment period.

Thanks,

\*Hila

**Hila Ritter**

Solid Waste Authorization Coordinator  
Property and Environmental Services

*My gender pronouns: she, her, hers.*

Metro | [oregonmetro.gov](http://oregonmetro.gov)

[600 NE Grand Ave.](#)

Portland, OR 97232-2736

[503-797-1862](tel:503-797-1862)

**From:**  
**Sent:** Monday, November 12, 2018 12:21 PM  
**To:** Metro Solid Waste Compliance <[SWICC@oregonmetro.gov](mailto:SWICC@oregonmetro.gov)>  
**Subject:** Grimm's

Hi,

I think the particulate level should be monitored, too. When there is wind, the pollution is high, the Grimms throughs off a suffecating odor and it is hard to breathe. I live on Pacific Drive, right across from Grimm's. I don't normally have breathing issues. If there is chemical used, there should be studies on potential cancer risk. Don't want years from now developing cancer from breathing in dust.

Thank you,  
June

## Eric Crandall

---

**From:** Metro Solid Waste Compliance  
**Sent:** Tuesday, November 27, 2018 8:52 AM  
**To:** Brian Trump; Metro Solid Waste Compliance  
**Subject:** RE: Grimm's Fuel License - Comments

Brian,

Thank you for your comment – they will be included in our records.

Thanks again,  
Eric

[Eric Balbin Crandall](#)  
Oregon Metro | [OregonMetro.Gov](#)  
Program Assistant for SWICC and cPMO Offices  
503-797-1662  
Eric's in the office: M-F 8-4:30

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**From:**  
**Sent:** Sunday, November 25, 2018 4:14 PM  
**To:** Metro Solid Waste Compliance  
**Subject:** Grimm's Fuel License - Comments

To Whom it May Concern,

I am a resident in the neighborhood on the North side of 99W across from Grimm's Fuel and wanted to provide my comments regarding the recent complaints and proposed restrictions.

Neither myself or my wife have ever believed the smell that results from Grimm's Fuel doing business to be excessive or disruptive. In the two years that we have lived in our home, I can count on one hand the number of times that I recall even being able to smell anything at all. I have found that the smell of someone putting down fresh mulch or barkdust in the neighborhood is stronger than the smell produced by Grimm's Fuel.

Grimm's Fuel has been doing business for over 80 years and this neighborhood has only been here for approximately 25 years; the residents moving into this neighborhood have, or should have, long known about Grimm's Fuel and the nature of their business. Not once in the two years I have lived in my home have I felt that the smell of Grimm's Fuel has affected my ability to enjoy my home, including warm summer evenings. I have never felt I needed to lock myself in my home and close all my windows and doors as some people have complained.

It is my understanding that Grimm's Fuel is currently abiding by all rules and regulations and I do not believe they should be penalized for simply doing business. The suggestion from the Clean Air Safe Environment (CASE) community group that Grimm's Fuel "contain odor and dust to Grimm's property boundaries" is simply absurd; I would challenge anyone to do the same when attempting to care for their property. Simply mowing your lawn would violate this proposed rule.

People say they want a place to dispose of their yard debris and get organic mulch and other fertilizer products, but they also complain about the smell of the very products and services they want. If there are reasonable improvements that can be made in the processes that Grimm's Fuel uses when doing business, that is fine; however, imposing rules and sanctions that would effectively harm their business by restricting their ability to process yard debris waste or require a



large capital expenditure, is unfair given the minimal impact towards “making a difference in the livability of my neighborhood” as worded by CASE.

I would urge you to consider all sides to this scenario before enacting any further restrictions on Grimm’s Fuel due to the complaints of what seems to be a very small group of individuals.

Sincerely,  
Brian Trump

## Eric Crandall

---

**From:** Metro Solid Waste Compliance  
**Sent:** Tuesday, November 27, 2018 12:14 PM  
**To:** Susie Davis; Metro Solid Waste Compliance  
**Subject:** RE: Metro License Grimm's Fuel

Hello Susie,

Thanks for your comment. Metro will respond to comments in the staff report, which will be available online as an update to the Grimm's Fuel Company [public notice webpage](#) after the close of the public comment period.

Thanks again,  
Eric

[Eric Balbin Crandall](#)  
Oregon Metro | [OregonMetro.Gov](#)  
Program Assistant for SWICC and cPMO Offices  
503-797-1662  
Eric's in the office: M-F 8-4:30

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**From:**  
**Sent:** Monday, November 26, 2018 10:00 AM  
**To:** Metro Solid Waste Compliance  
**Subject:** Metro License Grimm's Fuel

We appreciate the work that Metro has done to help Grimm's Fuel improve and modernize their composting operations. We are grateful for the new aerobic composting and monitoring requirements in the proposed Metro License, however, there are number of key areas where the proposed Metro License is not adequate:

**Operating Plan:** We insist that citizen input be required for approval of both the initial Operating Plan and any subsequent changes to the Operating Plan. We request that any operational parameters that can be included directly in the text of the License be so included, rather than being delegated to the Operating Plan, which has not yet been made public.

**No Offsite Odors:** We demand that the Metro License require no offsite odors. We will not tolerate odors in our homes and on our private property. Metro needs to replace the vague language of "minimize offsite odors" with the clear objective language of "prevent offsite odors". All weasel words must be removed from the License. The License must include only objective, measurable conditions.

**Oxygen:** A minimum 10% oxygen level must be required in all parts of the active compost piles at all times, as described in the GMT report. If oxygen levels drop below 10%, immediate corrective action must be taken by the Operator to bring oxygen levels back up to 10%. If oxygen levels fall below 5%, Operator must notify Metro immediately, cease accepting incoming feedstocks, and focus all efforts on restoring oxygen levels to the 10% minimum level specified in the GMT report. After such event, Metro must verify that oxygen levels have in fact been restored to their 10% minimum level before Operator may resume accepting incoming feedstocks.

**Time Frame:** We appreciate the due dates that Metro has set in the License for pile height reduction. We propose that all other provisions, requirements, and conditions of the Metro License shall go into full effect on or [before 12/31/2019](#). We request that the term of this new Metro License shall be two (2) years expiring on or [before 12/31/2020](#).

**Input Limit:** Incoming feedstock volumes should be limited to 35,000 tons per year, which will restore production volumes back to their 2011 levels. This input limit must remain in place until the new system has been in operation for one year without offsite dust and/or offsite odor impacts.

**Citizen Odor Monitoring:** We request that Metro provide a Nasal Ranger for community use and provide funding for citizen representatives to be trained and certified for using the Nasal Ranger to monitor offsite odors in residential areas.

**Third Party Odor Monitoring:** The Metro License must require that a third-party odor monitoring service (“Monitor”) be hired to measure and record any and all offsite odors. Monitor must document the Location and D/T Ratio of these offsite odors. Monitor must be trained and certified to use the Nasal Ranger and must not have any conflicts of interest. Monitor must perform random odor sampling (Day, Night, Morning, and Evening) and must also be available for incident response odor sampling whenever citizen complaints identify offsite odors.

**Flow Rate:** License must require that the Operator monitor, track, and record the air flow rate and pressure drop on all air blowers at the facility.

**PFRP:** License must require, in crystal clear language, that all composting operations at the facility must comply with the Process to Further Reduce Pathogens (PFRP) standards as defined by ORS and EPA.

**Transparency:** We propose that citizen representatives are included in any and all meetings between Metro and Grimm’s. We request that no last-minute changes be made to the proposed Metro License without informing the citizen representatives as to the substance of such changes prior to issuance.

Sue Davis

## Eric Crandall

---

**From:** Metro Solid Waste Compliance  
**Sent:** Tuesday, November 27, 2018 12:17 PM  
**To:** Lazaro Rodriguez; Metro Solid Waste Compliance  
**Subject:** RE: Comments

Hello,

Thanks for your comment. Metro will respond to comments in the staff report, which will be available online as an update to the Grimm's Fuel Company [public notice webpage](#) after the close of the public comment period.

Thanks,  
Eric

Eric Balbin Crandall  
Oregon Metro | OregonMetro.Gov  
Program Assistant for SWICC and cPMO Offices  
503-797-1662  
Eric's in the office: M-F 8-4:30

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

From: Lazaro Rodriguez [mailto:lrins54@gmail.com]  
Sent: Monday, November 26, 2018 2:32 PM  
To: Metro Solid Waste Compliance  
Subject: Comments

See attached

LR



**Metro**

### Comment Card

Thank you for attending this community conversation regarding Grimm's Fuel Company. Please use this card to share your comments.

For more information visit <http://www.oregonmetro.gov/grimms>

Comments: I feel Grimms is getting a very lenient treatment. Makes me wonder who they know to be given such latitude.

Seems like during the meeting a comment was made as to shutting down Grimms would mean having other neighborhoods with this situation. Are we the chosen to have the smell and whatever other problems come with it

## Eric Crandall

---

**From:** Metro Solid Waste Compliance  
**Sent:** Tuesday, November 27, 2018 12:19 PM  
**To:** Diane Freedman; Metro Solid Waste Compliance  
**Subject:** RE: Grimms comments

Hello Diane,

Thanks for your comment. Metro will respond to comments in the staff report, which will be available online as an update to the Grimm's Fuel Company [public notice webpage](#) after the close of the public comment period.

Thanks,  
Eric

[Eric Balbin Crandall](#)  
Oregon Metro | [OregonMetro.Gov](#)  
Program Assistant for SWICC and cPMO Offices  
503-797-1662  
Eric's in the office: M-F 8-4:30

---

**From:**  
**Sent:** Monday, November 26, 2018 2:52 PM  
**To:** Metro Solid Waste Compliance  
**Subject:** Grimms comments

I appreciate the work that Metro has done to help Grimm's Fuel improve and modernize their composting operations. I am grateful for the new aerobic composting and monitoring requirements in the proposed Metro License, however, there are number of key areas where the proposed Metro License is not adequate:

**Operating Plan:** Citizen input must be required for approval of both the initial Operating Plan and any subsequent changes to the Operating Plan. Any operational parameters that can be included directly in the text of the License must be so included, rather than being delegated to the Operating Plan, which has not yet been made public.

**No Offsite Odors:** I demand that the Metro License require NO offsite odors. We will not tolerate odors in our homes and on our private property. Metro needs to replace the vague language of "minimize offsite odors" with the clear objective language of "prevent offsite odors". All weasel words must be removed from the License. The License must include only objective, measurable conditions.

**Oxygen:** A minimum 10% oxygen level must be required in all parts of the active compost piles at all times, as described in the GMT report. If oxygen levels drop below 10%, immediate corrective action must be taken by the Operator to bring oxygen levels back up to 10%. If oxygen levels fall below 5%, Operator must notify Metro immediately, cease accepting incoming feedstocks, and focus all efforts on restoring oxygen levels to the 10% minimum level specified in the GMT report. After such event, Metro must verify that oxygen levels have in fact been restored to their 10% minimum level before Operator may resume accepting incoming feedstocks.

**Time Frame:** We appreciate the due dates that Metro has set in the License for pile height reduction. We propose that all other provisions, requirements, and conditions of the Metro License shall go into full effect on or before 12/31/2019. We request that the term of this new Metro License shall be two (2) years expiring on or before 12/31/2020.

**Input Limit:** Incoming feedstock volumes should be limited to 35,000 tons per year, which will restore production volumes back to their 2011 levels. This input limit must remain in place until the new system has been in operation for one year without offsite dust and/or offsite odor impacts.

**Citizen Odor Monitoring:** We request that Metro provide a Nasal Ranger for community use and provide funding for citizen representatives to be trained and certified for using the Nasal Ranger to monitor offsite odors in residential areas.

**Third Party Odor Monitoring:** The Metro License must require that a third-party odor monitoring service (“Monitor”) be hired to measure and record any and all offsite odors. Monitor must document the Location and D/T Ratio of these offsite odors. Monitor must be trained and certified to use the Nasal Ranger and must not have any conflicts of interest. Monitor must perform random odor sampling (Day, Night, Morning, and Evening) and must also be available for incident response odor sampling whenever citizen complaints identify offsite odors.

**Flow Rate:** License must require that the Operator monitor, track, and record the air flow rate and pressure drop on all air blowers at the facility.

**PFRP:** License must require, in crystal clear language, that all composting operations at the facility must comply with the Process to Further Reduce Pathogens (PFRP) standards as defined by ORS and EPA.

**Transparency:** We propose that citizen representatives are included in any and all meetings between Metro and Grimm’s. We request that no last-minute changes be made to the proposed Metro License without informing the citizen representatives as to the substance of such changes prior to issuance.

Sent from my iPhone

## Eric Crandall

---

**From:** Metro Solid Waste Compliance  
**Sent:** Tuesday, November 27, 2018 12:20 PM  
**To:** Robin Smith; Metro Solid Waste Compliance  
**Subject:** RE: Grimm's fuel

Robin,

Thanks for your comment. Metro will respond to comments in the staff report, which will be available online as an update to the Grimm's Fuel Company [public notice webpage](#) after the close of the public comment period.

Thanks,  
Eric

Eric Balbin Crandall  
Oregon Metro | OregonMetro.Gov  
Program Assistant for SWICC and cPMO Offices  
503-797-1662  
Eric's in the office: M-F 8-4:30

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

**From:**  
**Sent:** Monday, November 26, 2018 4:19 PM  
**To:** Metro Solid Waste Compliance  
**Subject:** Grimm's fuel

I have lived in on 135th Terrace in Tualatin for nearly 11 years. I have endured the exposure of Grim's fuel in all of this time. The outcome of the exposure? Cancer, Chronic Obstructive Pulmonary Disease (COPD), allergies, and or disorders of various causes? So far I have developed asthma since living here. Should I move? No! When I bought this property there were no warnings, or choices that Grim's would be contaminating our air quality. I have heard argument that Grimm's has been in business long before this neighborhood was established. However, no air quality should be violated at any time. Since this neighborhood has become an area for families, concern should be of priority to ensure safety and health of all who reside. If Grimm's fuel cannot abide by the OSHA or air quality guidelines then they should be shut down immediately! If even one person is complaining of health issues it is an immediate concern. I read recently in "Next door Pony Ridge" that a child was vomiting with the smell of Grimm's Fuel. This is unacceptable. My daughter, Mindy, who lives in Coos Bay, OR was appalled by the smell when visiting us this Summer. I am stunned this business is able to still conduct business with exposure to populations nearby. This is unacceptable and I am sure a lawyer could file a class action suit at this point.

Robin Smith



## Eric Crandall

---

**From:** Metro Solid Waste Compliance  
**Sent:** Tuesday, November 27, 2018 12:21 PM  
**To:** R B; Metro Solid Waste Compliance  
**Subject:** RE: Proposed License Grimms

Rocky,

Thanks for your comment. Metro will respond to comments in the staff report, which will be available online as an update to the Grimm's Fuel Company [public notice webpage](#) after the close of the public comment period.

Thanks,  
Eric

[Eric Balbin Crandall](#)  
Oregon Metro | [OregonMetro.Gov](#)  
Program Assistant for SWICC and cPMO Offices  
503-797-1662  
Eric's in the office: M-F 8-4:30

---

**From:**  
**Sent:** Monday, November 26, 2018 5:41 PM  
**To:** Metro Solid Waste Compliance  
**Subject:** Proposed License Grimms

We appreciate the work that Metro has done to help Grimm's Fuel improve and modernize their composting operations. We are grateful for the new aerobic composting and monitoring requirements in the proposed Metro License, however, there are number of key areas where the proposed Metro License is not adequate:

**Operating Plan:** We insist that citizen input be required for approval of both the initial Operating Plan and any subsequent changes to the Operating Plan. We request that any operational parameters that can be included directly in the text of the License be so included, rather than being delegated to the Operating Plan, which has not yet been made public.

**No Offsite Odors:** We demand that the Metro License require no offsite odors. We will not tolerate odors in our homes and on our private property. Metro needs to replace the vague language of "minimize offsite odors" with the clear objective language of "prevent offsite odors". All weasel words must be removed from the License. The License must include only objective, measurable conditions.

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

Respectfully,

Rocky Bixby, Ponyridge

## Eric Crandall

---

**From:** Metro Solid Waste Compliance  
**Sent:** Tuesday, November 27, 2018 12:23 PM  
**To:** Eugene Kubovsky; Metro Solid Waste Compliance  
**Subject:** RE: Grimm's Fuel - a Public Comments

Eugene,

Thanks for your comment. Metro will respond to comments in the staff report, which will be available online as an update to the Grimm's Fuel Company [public notice webpage](#) after the close of the public comment period.

Thanks,  
Eric

[Eric Balbin Crandall](#)  
Oregon Metro | [OregonMetro.Gov](#)  
Program Assistant for SWICC and cPMO Offices  
503-797-1662  
Eric's in the office: M-F 8-4:30

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**From:**  
**Sent:** Monday, November 26, 2018 7:15 PM  
**To:** Metro Solid Waste Compliance  
**Subject:** Grimm's Fuel - a Public Comments

Dear planners!

My name is Eugene Kubovsky,  
I live at Peachtree Dr, Tigard, OR  
Today is Monday, November 26th, 2018

I am writing regarding the ongoing issue with Grimm's Fuel and the odor odor coming from Grimm's facility, which me and my family, as well as all other residents in our community, regularly experience. It is quite regular, and there are days when we can't say we are going out to get some fresh air - it doesn't feel fresh at all. More like sitting next to a compost pile.

I learned that there were several meetings in regards to this issue, and several changes to the licensing of Grimm's activity have been proposed.  
I want to support the statement of the Oregon Air - the group of residents impacted by odors emanating from the composting operation at Grimm's Fuel in Tualatin, Oregon  
Below is the Position Statement which we fully support:

We appreciate the work that Metro has done to help Grimm's Fuel ("Operator") improve and modernize their composting operations. We are grateful for the new aerobic composting and monitoring requirements in the proposed Metro License, however, there are number of key areas where the proposed Metro License is not adequate:

**Operating Plan:** We insist that citizen input be required for approval of both the initial Operating Plan and any subsequent changes to the Operating Plan. We request that any operational parameters that can be included directly in the text of the License be so included, rather than being delegated to the Operating Plan, which has not yet been made public.

**No Offsite Odors:** We demand that the Metro License require no offsite odors. We will not tolerate odors in our homes and on our private property. Metro needs to replace the vague language of “minimize offsite odors” with the clear objective language of “prevent offsite odors”. All weasel words must be removed from the License. The License must include only objective, measurable conditions.

**Oxygen:** A minimum 10% oxygen level must be required in all parts of the active compost piles at all times, as described in the GMT report. If oxygen levels drop below 10%, immediate corrective action must be taken by Operator to bring oxygen levels back up to 10%. If oxygen levels fall below 5%, Operator must notify Metro immediately, cease accepting incoming feedstocks, and focus all efforts on restoring oxygen levels to the 10% minimum level specified in the GMT report. After such event, Metro must verify that oxygen levels have in fact been restored to their 10% minimum level before Operator may resume accepting incoming feedstocks.

**Time Frame:** We appreciate the due dates that Metro has set in the License for pile height reduction. We propose that all other provisions, requirements, and conditions of the Metro License shall go into full effect on or before 12/31/2019. We request that the term of this new Metro License shall be two (2) years expiring on or before 12/31/2020.

**Input Limit:** Incoming feedstock volumes should be limited to 35,000 tons per year, which will restore production volumes back to their 2013 levels. This input limit must remain in place until the new system has been in operation for one year without offsite dust and/or offsite odor impacts.

**Citizen Odor Monitoring:** We request that Metro provide a Nasal Ranger for community use and provide funding for citizen representatives to be trained and certified for using the Nasal Ranger to monitor offsite odors in residential areas.

**Third Party Odor Monitoring:** The Metro License must require that a third-party odor monitoring service (“Monitor”) be hired to measure and record any and all offsite odors. Monitor must document the location and D/T ratio of these offsite odors. Monitor must be trained and certified to use the Nasal Ranger and must not have any conflicts of interest. Monitor must perform random odor sampling (Day, Night, Morning, and Evening) and must also be available for incident response odor sampling whenever citizen complaints identify offsite odors.

**Flow Rate:** License must require that the Operator monitor, track, and record the air flow rate and pressure drop on all air blowers at the facility.

**PFRP:** License must require, in crystal clear language, that all composting operations at the facility must comply with the Process to Further Reduce Pathogens (PFRP) standards as defined by ORS and EPA.

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

Thank you!

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Best regards,

**Eugene Kubovsky**  
**Web Developer**  
**Drupal / Wordpress**  
**Web Design**

## Eric Crandall

---

**From:** Metro Solid Waste Compliance  
**Sent:** Tuesday, November 27, 2018 12:24 PM  
**To:** Metro Solid Waste Compliance  
**Subject:** RE: Klamath Soil Amendments

Larry,

Thanks for your comment. Metro will respond to comments in the staff report, which will be available online as an update to the Grimm's Fuel Company [public notice webpage](#) after the close of the public comment period.

Thanks,  
Eric

Eric Balbin Crandall  
Oregon Metro | OregonMetro.Gov  
Program Assistant for SWICC and cPMO Offices  
503-797-1662  
Eric's in the office: M-F 8-4:30

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

**From:**  
**Sent:** Monday, November 26, 2018 9:13 PM  
**To:** Metro Solid Waste Compliance  
**Subject:** Klamath Soil Amendments

I've tried to set up a composting facility in Crescent, Oregon on 70 acres. DEQ at the last moment pulled the permit, because the new Klamath Commissioners didn't know anything about the application. The 70 acres is basically in the middle of no where, mile and a half through the trees to the closest house, but is located in the transportation lanes of the chip and pumice haulers. Yes, there's a need for compost in Klamath, Lake Counties and Tulelake farming regions. These three areas combined have over 125,000 acres under cultivation, every 5 years crop rotation, they use approximately over 75,000 tons of compost, which is brought in from California and Eastern Washington. A small percentage comes from Western Oregon, but the farmers tell me, they have water don't need it hauled to them. Western Oregon compost runs about 50% moisture in September, where California and Washington runs about 20% moisture starting in June. I know this for a fact because we've hauled hundreds of loads from Eastern Washington and California.

This is the answer Metro is looking for, to keep the material in Oregon to enrich our farmlands and to have an end use that is feasible. It will help relieve the problems of the collection and composting in the Metropolitan area.

Klamath Soil Amendments  
Larry Morrison

Sent from my iPhone

## Eric Crandall

---

**From:** Metro Solid Waste Compliance  
**Sent:** Tuesday, November 27, 2018 12:26 PM  
**To:** Virginia Green; Metro Solid Waste Compliance  
**Subject:** RE: Grimms Fuel License

Virginia,

Thanks for your comment. Metro will respond to comments in the staff report, which will be available online as an update to the Grimm's Fuel Company [public notice webpage](#) after the close of the public comment period.

Thanks,  
Eric

[Eric Balbin Crandall](#)  
Oregon Metro | [OregonMetro.Gov](#)  
Program Assistant for SWICC and cPMO Offices  
503-797-1662  
Eric's in the office: M-F 8-4:30

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**From:**  
**Sent:** Monday, November 26, 2018 10:00 PM  
**To:** Metro Solid Waste Compliance  
**Subject:** Grimms Fuel License

Hello:

I have lived in Pony Ridge on 135th Terrace for the past eight years and it is a lovely neighborhood, except for the odors and dust coming from Grimm's Fuel, which is just across the highway from me.

**The new proposed Metro license is of concern to me and I feel strongly that it should include the following:**

- Odor and dust** should be confined to Grimm's property boundaries
- Oxygen levels in **ALL** parts of the composting piles be **no less than 10%** as recommended in the Green Mountain Technologies assessment
- Nasal Ranger device** (as used by Green Mountain Technologies) should be used by Metro to monitor odor
- Metro to respond to all violations with **progressive penalties**

Thank you,

Virginia Green - CASE member

## Eric Crandall

---

**From:** Metro Solid Waste Compliance  
**Sent:** Tuesday, November 27, 2018 12:27 PM  
**To:** ROBYN SHAW; Metro Solid Waste Compliance  
**Subject:** RE: Grimms Fuel Co. Comments

Robyn,

Thanks for your comment. Metro will respond to comments in the staff report, which will be available online as an update to the Grimm's Fuel Company [public notice webpage](#) after the close of the public comment period.

Thanks,  
Eric

[Eric Balbin Crandall](#)  
Oregon Metro | [OregonMetro.Gov](#)  
Program Assistant for SWICC and cPMO Offices  
503-797-1662  
Eric's in the office: M-F 8-4:30

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**From:**  
**Sent:** Tuesday, November 27, 2018 11:47 AM  
**To:** Metro Solid Waste Compliance  
**Subject:** Grimms Fuel Co. Comments

We appreciate the work that Metro has done to help Grimm's Fuel improve and modernize their composting operations. We are grateful for the new aerobic composting and monitoring requirements in the proposed Metro License,. However, there are a number of key areas where the proposed Metro License is NOT adequate and set up all parties for failure and a continued battle:

**Operating Plan:** We insist that citizen input be required for approval of both the initial Operating Plan and any subsequent changes to the Operating Plan. We request that any operational parameters that can be included directly in the text of the License be so included, rather than being delegated to the Operating Plan, which has not yet been made public.

**No Offsite Odors:** We demand that the Metro License require no offsite odors. **We will not tolerate odors in our homes and on our private property.** Metro needs to replace the **extremely** vague language of "minimize offsite odors" with the clear objective language of "prevent offsite odors". All weasel words must be removed from the License. **The License must include only objective, measurable conditions.**

**Oxygen:** A minimum 10% oxygen level must be required in all parts of the active compost piles at all times, as described in the GMT report. If oxygen levels drop below 10%, immediate corrective action must be taken by the Operator to bring oxygen levels back up to 10%. If oxygen levels fall below 5%, Operator must notify Metro immediately, cease accepting incoming feedstocks, and focus all efforts on restoring oxygen levels to the 10% minimum level specified in the GMT report. After such event, Metro must verify that oxygen levels have in fact been restored to their 10% minimum level before Operator may resume accepting incoming feedstocks.

**Time Frame:** We appreciate the due dates that Metro has set in the License for pile height reduction. We propose that all other provisions, requirements, and conditions of the Metro License shall go into full effect on or before



12/31/2019. **We request that the term of this new Metro License shall be two (2) years expiring on or before 12/31/2020.**

**Input Limit:** Incoming feedstock volumes should be limited to 35,000 tons per year, which will restore production volumes back to their 2011 levels. This input limit must remain in place until the new system has been in operation for one year without offsite dust and/or offsite odor impacts.

**Citizen Odor Monitoring:** We request that Metro provide a Nasal Ranger for community use and provide funding for citizen representatives to be trained and certified for using the Nasal Ranger to monitor offsite odors in residential areas.

**Third Party Odor Monitoring:** The Metro License must require that a third-party odor monitoring service ("Monitor") be hired to measure and record any and all offsite odors. Monitor must document the Location and D/T Ratio of these offsite odors. Monitor must be trained and certified to use the Nasal Ranger and must not have any conflicts of interest. Monitor must perform random odor sampling (Day, Night, Morning, and Evening) and must also be available for incident response odor sampling whenever citizen complaints identify offsite odors.

**Flow Rate:** License must require that the Operator monitor, track, and record the air flow rate and pressure drop on all air blowers at the facility.

**PFRP:** License must require, in crystal clear language, that all composting operations at the facility must comply with the Process to Further Reduce Pathogens (PFRP) standards as defined by ORS and EPA.

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

Taxpayers have paid a LOT of money for the independent consultant, with the agreement of Grimms, which submitted specific recommendation plans have apparently not been adhered to or dismissed by Grimms, who now want to get their own consultant! I don't think that will be popular with any member of the community, little alone, the state's taxpayers. There is nothing to indicate that this is not a delay tactic.

Please take into consideration that this has drug out and drug out and out and out.... **The public unacceptably suffers nearly daily from Grimms.** I respectfully request your adherence to the public good as an urgent priority and to keep Grimms accountable for their lack of action.

Sincerely,  
Robyn Shaw

## Eric Crandall

---

**From:** Metro Solid Waste Compliance  
**Sent:** Tuesday, November 27, 2018 12:29 PM  
**To:** Ashlyn Manns; Metro Solid Waste Compliance  
**Subject:** RE: Grimm's- support for the local business

Ashlyn,

Thanks for your comment. Metro will respond to comments in the staff report, which will be available online as an update to the Grimm's Fuel Company [public notice webpage](#) after the close of the public comment period.

Thanks,  
Eric

Eric Balbin Crandall  
Oregon Metro | OregonMetro.Gov  
Program Assistant for SWICC and cPMO Offices  
503-797-1662  
Eric's in the office: M-F 8-4:30

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

**From:**  
**Sent:** Tuesday, November 27, 2018 12:01 PM  
**To:** Metro Solid Waste Compliance  
**Subject:** Grimm's- support for the local business

To whom it may concern,

This email is in support of Grimm's Compost Service. They have been a staple in the area, have great service, and are a value to the community.

We ask that Grimm's not be driven out of the community by a person who did not consider that they were buying next to a compost factory.

Thank you for considering this email in support.

Ashlyn Dietz

Sent from my iPhone  
Please excuse any typos and informalities.

## Eric Crandall

---

**From:** Metro Solid Waste Compliance  
**Sent:** Friday, November 30, 2018 8:07 AM  
**To:** Ashley Allen; Metro Solid Waste Compliance  
**Subject:** RE: Grimm's Fuel

Hello,

Thanks for your comment. Metro will respond to comments in the staff report, which will be available online as an update to the Grimm's Fuel Company [public notice webpage](#) after the close of the public comment period.

Thanks again,  
Eric

[Eric Balbin Crandall](#)  
Oregon Metro | [OregonMetro.Gov](#)  
Program Assistant for SWICC and cPMO Offices  
503-797-1662  
Eric's in the office: M-F 8-4:30

**From:**  
**Sent:** Tuesday, November 27, 2018 6:56 PM  
**To:** Metro Solid Waste Compliance  
**Subject:** Grimm's Fuel

Thank you for helping to regulate Grimm's. I live close to it.

Here's what I'd like to see:

- Require citizen input for approval of the Operating Plan.
- Require no offsite odors.
- Replace "minimize offsite odors" with "prevent offsite odors".
- The License must include only objective, measurable conditions.
- Require 10% minimum oxygen level at all times.
- Stop accepting new feedstocks if oxygen level falls below 5%.
- Set the License term at 2 years.
- Limit input volume to 35,000 tons per year.
- Require third-party odor monitoring and odor incident response.
- Track and record air flow and pressure drop in all air blowers.
- Require that all composting operations meet PFRP.
- Citizen representatives at any meetings between Metro and Grimm's.
- No last-minute changes to Metro License prior to issuance.

Thank you,  
Ashley Gill  
King City, OR

## Eric Crandall

---

**From:** Metro Solid Waste Compliance  
**Sent:** Friday, November 30, 2018 8:09 AM  
**To:** Metro Solid Waste Compliance  
**Cc:**  
**Subject:** RE: Grimm's Fuel

Hello,

Thanks for your comment. Metro will respond to comments in the staff report, which will be available online as an update to the Grimm's Fuel Company [public notice webpage](#) after the close of the public comment period.

Thanks again,  
Eric

Eric Balbin Crandall  
Oregon Metro | OregonMetro.Gov  
Program Assistant for SWICC and cPMO Offices  
503-797-1662  
Eric's in the office: M-F 8-4:30

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

**From:**  
**Sent:** Tuesday, November 27, 2018 7:03 PM  
**To:** Metro Solid Waste Compliance  
**Cc:**  
**Subject:** Grimm's Fuel

This is an unfortunate time for composting companies in metropolitan area, Grimm's Fuel, S&H Logging, Recology N Plains, Canby S&G even PRC in Corvalics. Facilities that once were in rural areas are in the middle of sub divisions now, with more homes comes more feedstock and after composted no where to get rid of it.

People don't realize how fast feedstock grows, but usage of compost is once a year.

Turning compost into a marketable product on the Westside is very difficult, unless your able to store it inside to control the moisture. Bagging plants packaging blended materials with moist compost have a mold problem, along with avarice other problems producers end up with an abundance supply.

Grimm's is no different, they receive feedstock everyday, takes time to grind it, compost it and store it. It smells, dusty when the wind blows and it still smells, just part of urban life. Then there is a point in time, when you realize it's time to stop kicking the can and change directions. Being harassed by government agencies, sued by the public for nuisance odor and dust control, there might be a better place to do composting. Not in a urban setting with homes and businesses being built with in a few yards of the facility.

This is in support of Grimm's neighbors, that has spent millions building manufacturing businesses and the construction of sub divisions that can't open there doors or windows because of dust and odor.

Sent from my iP

## Eric Crandall

---

**From:** Metro Solid Waste Compliance  
**Sent:** Friday, November 30, 2018 8:10 AM  
**To:** Anna A Berardi; Metro Solid Waste Compliance  
**Subject:** RE: Grimm's Fuel License Inadequacies

Hello,

Thanks for your comment. Metro will respond to comments in the staff report, which will be available online as an update to the Grimm's Fuel Company [public notice webpage](#) after the close of the public comment period.

Thanks again,  
Eric

[Eric Balbin Crandall](#)  
Oregon Metro | [OregonMetro.Gov](#)  
Program Assistant for SWICC and cPMO Offices  
503-797-1662  
Eric's in the office: M-F 8-4:30

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**From:**  
**Sent:** Tuesday, November 27, 2018 7:11 PM  
**To:** Metro Solid Waste Compliance  
**Subject:** Grimm's Fuel License Inadequacies

To: Oregon Metro

I am a Tigard neighbor of Grimm's Fuel and am deeply disturbed by the gross inadequacies in their composting practices that increasingly creates foul-smelling, eye-watering, throat-burning air pollution for days and weeks at a time throughout the year. I am even more deeply troubled by the state of Oregon's negligence to properly regulate a business that is now a public nuisance and a threat to public safety.

I support the well-thought out and reasoned recommendations presented by Open Air as follows:

### **Position Statement: Oregon Air**

We appreciate the work that Metro has done to help Grimm's Fuel ("Operator") improve and modernize their composting operations. We are grateful for the new aerobic composting and monitoring requirements in the proposed Metro License, however, there are number of key areas where the proposed Metro License is not adequate:

**Operating Plan:** We insist that citizen input be required for approval of both the initial Operating Plan and any subsequent changes to the Operating Plan. We request that any operational parameters that can be included directly in the text of the License be so included, rather than being delegated to the Operating Plan, which has not yet been made public.

**No Offsite Odors:** We demand that the Metro License require no offsite odors. We will not tolerate odors in our homes and on our private property. Metro needs to replace the vague language of “minimize offsite odors” with the clear objective language of “prevent offsite odors”. All weasel words must be removed from the License. The License must include only objective, measurable conditions.

**Oxygen:** A minimum 10% oxygen level must be required in all parts of the active compost piles at all times, as described in the GMT report. If oxygen levels drop below 10%, immediate corrective action must be taken by Operator to bring oxygen levels back up to 10%. If oxygen levels fall below 5%, Operator must notify Metro immediately, cease accepting incoming feedstocks, and focus all efforts on restoring oxygen levels to the 10% minimum level specified in the GMT report. After such event, Metro must verify that oxygen levels have in fact been restored to their 10% minimum level before Operator may resume accepting incoming feedstocks.

**Time Frame:** We appreciate the due dates that Metro has set in the License for pile height reduction. We propose that all other provisions, requirements, and conditions of the Metro License shall go into full effect on or before 12/31/2019. We request that the term of this new Metro License shall be two (2) years expiring on or before 12/31/2020.

**Input Limit:** Incoming feedstock volumes should be limited to 35,000 tons per year, which will restore production volumes back to their 2013 levels. This input limit must remain in place until the new system has been in operation for one year without offsite dust and/or offsite odor impacts.

**Citizen Odor Monitoring:** We request that Metro provide a Nasal Ranger for community use and provide funding for citizen representatives to be trained and certified for using the Nasal Ranger to monitor offsite odors in residential areas.

**Third Party Odor Monitoring:** The Metro License must require that a third-party odor monitoring service (“Monitor”) be hired to measure and record any and all offsite odors. Monitor must document the location and D/T ratio of these offsite odors. Monitor must be trained and certified to use the Nasal Ranger and must not have any conflicts of interest. Monitor must perform random odor sampling (Day, Night, Morning, and Evening) and must also be available for incident response odor sampling whenever citizen complaints identify offsite odors.

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**PFRP:** License must require, in crystal clear language, that all composting operations at the facility must comply with the Process to Further Reduce Pathogens (PFRP) standards as defined by ORS and EPA.

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

Please know that Grimm’s provides a valuable service and I hope that continues. But as their services and the environment in which they serve changes, so must their practices. It is not acceptable to ignore community standards for a peaceable and healthy environment just to accommodate a business that refuses or cannot upgrade their practices.

Thank you for your consideration.

## Eric Crandall

---

**From:** Metro Solid Waste Compliance  
**Sent:** Friday, November 30, 2018 8:11 AM  
**To:** Metro Solid Waste Compliance; Hila Ritter; Duane Altig; Brett Hamilton  
**Subject:** RE: Comments Regarding Metro's License for Grimm's Fuel Company

Hello,

Thanks for your comment. Metro will respond to comments in the staff report, which will be available online as an update to the Grimm's Fuel Company [public notice webpage](#) after the close of the public comment period.

Thanks again,  
Eric

[Eric Balbin Crandall](#)  
Oregon Metro | [OregonMetro.Gov](#)  
Program Assistant for SWICC and cPMO Offices  
503-797-1662  
Eric's in the office: M-F 8-4:30

---

**From:**  
**Sent:** Tuesday, November 27, 2018 7:56 PM  
**To:** Metro Solid Waste Compliance; Hila Ritter; Duane Altig; Brett Hamilton;  
**Subject:** Comments Regarding Metro's License for Grimm's Fuel Company

Greetings,

We (as neighbors near and far from Grimm's Fuel Company) appreciate the work that Metro has done to help Grimm's Fuel improve and modernize their composting operations. We are grateful for the new aerobic composting and monitoring requirements in the proposed Metro License, however, there are number of key areas where the proposed Metro License is not adequate:

**Operating Plan:** We insist that citizen input be required for approval of both the initial Operating Plan and any subsequent changes to the Operating Plan. We request that any operational parameters that can be included directly in the text of the License be so included, rather than being delegated to the Operating Plan, which has not yet been made public.

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

Thank you,  
Julie Neumann



## Eric Crandall

---

**From:** Metro Solid Waste Compliance  
**Sent:** Friday, November 30, 2018 8:12 AM  
**To:** Gretchen Russell; Metro Solid Waste Compliance  
**Subject:** RE: Input regarding Grimms Fuel & Our Air Quality

Hello,

Thanks for your comment. Metro will respond to comments in the staff report, which will be available online as an update to the Grimm's Fuel Company [public notice webpage](#) after the close of the public comment period.

Thanks again,  
Eric

[Eric Balbin Crandall](#)  
Oregon Metro | [OregonMetro.Gov](#)  
Program Assistant for SWICC and cPMO Offices  
503-797-1662  
Eric's in the office: M-F 8-4:30

**From:**  
**Sent:** Tuesday, November 27, 2018 8:09 PM  
**To:** Metro Solid Waste Compliance  
**Subject:** Input regarding Grimms Fuel & Our Air Quality

We appreciate the work that Metro has done to help Grimm's Fuel ("Operator") improve and modernize their composting operations. We are grateful for the new aerobic composting and monitoring requirements in the proposed Metro License, however, there are number of key areas where the proposed Metro License is not adequate:

**Operating Plan:** We insist that citizen input be required for approval of both the initial Operating Plan and any subsequent changes to the Operating Plan. We request that any operational parameters that can be included directly in the text of the License be so included, rather than being delegated to the Operating Plan, which has not yet been made public.

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focus all efforts on restoring oxygen levels to the 10% minimum level specified in the GMT report. After such event, Metro must verify that oxygen levels have in fact been restored to their 10% minimum level before Operator may resume accepting incoming feedstocks.

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

--

**Gretchen Russell, *servicing Oregon for 25 years***

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## Eric Crandall

---

**From:** Metro Solid Waste Compliance  
**Sent:** Friday, November 30, 2018 8:12 AM  
**To:** Metro Solid Waste Compliance; Hila Ritter; Duane Altig;  
**Subject:** RE: Comments Regarding Metro's License Renewal for Grimm's Fuel Company

Hello,

Thanks for your comment. Metro will respond to comments in the staff report, which will be available online as an update to the Grimm's Fuel Company [public notice webpage](#) after the close of the public comment period.

Thanks again,  
Eric

[Eric Balbin Crandall](#)  
Oregon Metro | [OregonMetro.Gov](#)  
Program Assistant for SWICC and cPMO Offices  
503-797-1662  
Eric's in the office: M-F 8-4:30

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**From:**  
**Sent:** Tuesday, November 27, 2018 8:22 PM  
**To:** Metro Solid Waste Compliance; Hila Ritter; Duane Altig; Ata Saedi; jneumann  
**Subject:** Comments Regarding Metro's License Renewal for Grimm's Fuel Company

Greetings,

While I have appreciated Metro's work in meeting with local citizens living near Grimm's Fuel Company during the past several months the new license proposal falls short in meeting seriously important areas of concern. At a minimum the renewed license should include:

1. All odor and dust should be confined to Grimm's property boundaries, regardless of weather conditions.
2. Oxygen levels in ALL parts of the composting piles will be no less than 10% as recommended by Green Mountain Technologies and their study conclusions paid for by taxpayers.
3. Metro will use a Nasal Ranger device in various locations to more objectively monitor foul odor emitted by Grimm's beyond their property boundaries and immediately take action to rectify the problem.
4. Any and all vague language in the renewed license needs to be written as such to be objective and measurable, especially regarding dust and odor. The word minimize is neither objective nor measurable.
5. Metro needs to respond to all violations of the revised/renewed license with progressive penalties.

Thank you,  
Julie Neumann

**From:** [Metro Solid Waste Compliance](#)  
**To:**  
**Subject:** RE: Grimm's  
**Date:** Tuesday, November 27, 2018 6:05:00 PM

---

Hello,

Thank you for your comment. Metro will respond to comments in the staff report, which will be available online as an update to the [Grimm's Fuel Company public notice webpage](#) after the close of the public comment period.

Thanks,

\*Hila

**Hila Ritter**

Solid Waste Authorization Coordinator  
Property and Environmental Services  
*My gender pronouns: she, her, hers.*

Metro | [oregonmetro.gov](http://oregonmetro.gov)

[600 NE Grand Ave.](#)

Portland, OR 97232-2736

[503-797-1862](tel:503-797-1862)

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

From:

Sent: Tuesday, November 27, 2018 2:38 PM

To: Metro Solid Waste Compliance <[SWICC@oregonmetro.gov](mailto:SWICC@oregonmetro.gov)>

Subject: Grimm's

Yes, Grimm's odor can spoil a nice day summer, fall, winter and spring. It's odor's are sickening and pungent and many times takes a whole day to go away. The first seven years I lived in King City the odor wasn't as lingering. The last three, what happened?

And curiously, since neighbors have questioned and done something, the odor has lightened quite a bit. What's with that? I'm sure it will become a problem again in the spring.

Garden Villa Resident

Barb Holloway

Sent from my iPad

**From:** [Metro Solid Waste Compliance](#)  
**To:**  
**Subject:** RE: Please consider the following  
**Date:** Tuesday, November 27, 2018 6:06:00 PM

---

Hello,

Thank you for your comment. Metro will respond to comments in the staff report, which will be available online as an update to the [Grimm's Fuel Company public notice webpage](#) after the close of the public comment period.

Thanks,

\*Hila

**Hila Ritter**

Solid Waste Authorization Coordinator  
Property and Environmental Services

*My gender pronouns: she, her, hers.*

Metro | [oregonmetro.gov](http://oregonmetro.gov)

[600 NE Grand Ave.](#)

Portland, OR 97232-2736

[503-797-1862](tel:503-797-1862)

---

**From:**  
**Sent:** Tuesday, November 27, 2018 3:11 PM  
**To:** Metro Solid Waste Compliance <[SWICC@oregonmetro.gov](mailto:SWICC@oregonmetro.gov)>  
**Subject:** Please consider the following

I live at 15074 SW Peachtree Drive in Tigard.

I am writing to request the following be incorporated into the Grumm's license:

Require citizen input for approval of the Operating Plan.

Require no offsite odors.

Replace "minimize offsite odors" with "prevent offsite odors".

The License must include only objective, measurable conditions.

Require 10% minimum oxygen level at all times.

Stop accepting new feedstocks if oxygen level falls below 5%.

Set the License term at 2 years.

Limit input volume to 35,000 tons per year.

Provide a Nasal Ranger for community use.

Provide funding for Nasal Ranger training and certification.

Require third-party odor monitoring and odor incident response.

Track and record air flow and pressure drop in all air blowers.

Require that all composting operations meet PFRP.

Citizen representatives at any meetings between Metro and Grimm's.

No last-minute changes to Metro License prior to issuance.

Sincerely,

Liz McLean-Williams

Sent from my iPhone



**From:** [Metro Solid Waste Compliance](#)  
**To:**  
**Subject:** RE: Grimm's Fuel - Tigard  
**Date:** Tuesday, November 27, 2018 6:06:00 PM

---

Hello,

Thank you for your comment. Metro will respond to comments in the staff report, which will be available online as an update to the [Grimm's Fuel Company public notice webpage](#) after the close of the public comment period.

Thanks,

\*Hila

**Hila Ritter**

Solid Waste Authorization Coordinator  
Property and Environmental Services

*My gender pronouns: she, her, hers.*

Metro | [oregonmetro.gov](http://oregonmetro.gov)

[600 NE Grand Ave.](#)

Portland, OR 97232-2736

[503-797-1862](tel:503-797-1862)

**From:**

**Sent:** Tuesday, November 27, 2018 3:27 PM

**To:** Metro Solid Waste Compliance <[SWICC@oregonmetro.gov](mailto:SWICC@oregonmetro.gov)>

**Subject:** Grimm's Fuel - Tigard

We appreciate the work that Metro has done to help Grimm's Fuel ("Operator") improve and modernize their composting operations. We are grateful for the new aerobic composting and monitoring requirements in the proposed Metro License, however, there are number of key areas where the proposed Metro License is not adequate:

**Operating Plan:** We insist that citizen input be required for approval of both the initial Operating Plan and any subsequent changes to the Operating Plan. We request that any operational parameters that can be included directly in the text of the License be so included, rather than being delegated to the Operating Plan, which has not yet been made public.

**No Offsite Odors:** We demand that the Metro License require no offsite odors. We will not tolerate odors in our homes and on our private property. Metro needs to replace the vague language of "minimize offsite odors" with the clear objective language of "prevent offsite odors". All weasel words must be removed from the License. The License must include only objective, measurable conditions.

**Oxygen:** A minimum 10% oxygen level must be required in all parts of the active compost piles at all times, as described in the GMT report. If oxygen levels drop

below 10%, immediate corrective action must be taken by Operator to bring oxygen levels back up to 10%. If oxygen levels fall below 5%, Operator must notify Metro immediately, cease accepting incoming feedstocks, and focus all efforts on restoring oxygen levels to the 10% minimum level specified in the GMT report. After such event, Metro must verify that oxygen levels have in fact been restored to their 10% minimum level before Operator may resume accepting incoming feedstocks.

**Time Frame:** We appreciate the due dates that Metro has set in the License for pile height reduction. We propose that all other provisions, requirements, and conditions of the Metro License shall go into full effect on or before 12/31/2019. We request that the term of this new Metro License shall be two (2) years expiring on or before 12/31/2020.

**Input Limit:** Incoming feedstock volumes should be limited to 35,000 tons per year, which will restore production volumes back to their 2013 levels. This input limit must remain in place until the new system has been in operation for one year without offsite dust and/or offsite odor impacts.

**Citizen Odor Monitoring:** We request that Metro provide a Nasal Ranger for community use and provide funding for citizen representatives to be trained and certified for using the Nasal Ranger to monitor offsite odors in residential areas.

**Third Party Odor Monitoring:** The Metro License must require that a third-party odor monitoring service (“Monitor”) be hired to measure and record any and all offsite odors. Monitor must document the location and D/T ratio of these offsite odors. Monitor must be trained and certified to use the Nasal Ranger and must not have any conflicts of interest. Monitor must perform random odor sampling (Day, Night, Morning, and Evening) and must also be available for incident response odor sampling whenever citizen complaints identify offsite odors.

**Flow Rate:** License must require that the Operator monitor, track, and record the air flow rate and pressure drop on all air blowers at the facility.

**PFRP:** License must require, in crystal clear language, that all composting operations at the facility must comply with the Process to Further Reduce Pathogens (PFRP) standards as defined by ORS and EPA.

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

Sincerely,

Angela DeMeo

**From:** [Metro Solid Waste Compliance](#)  
**To:**  
**Subject:** RE: Grimm's Fuel in Tualatin  
**Date:** Tuesday, November 27, 2018 6:06:00 PM

---

Hello,

Thank you for your comment. Metro will respond to comments in the staff report, which will be available online as an update to the [Grimm's Fuel Company public notice webpage](#) after the close of the public comment period.

Thanks,

\*Hila

**Hila Ritter**

Solid Waste Authorization Coordinator  
Property and Environmental Services  
*My gender pronouns: she, her, hers.*

Metro | [oregonmetro.gov](http://oregonmetro.gov)

[600 NE Grand Ave.](#)

Portland, OR 97232-2736

[503-797-1862](tel:503-797-1862)

---

**From:**  
**Sent:** Tuesday, November 27, 2018 4:45 PM  
**To:** Metro Solid Waste Compliance <[SWICC@oregonmetro.gov](mailto:SWICC@oregonmetro.gov)>  
**Subject:** Grimm's Fuel in Tualatin

I have lived in Tigard, King City area since 1986. I am currently in a location that is less than a mile from this facility. The frequency of odors emanating from their composting are few and far between. Only very rarely is it bad, and I am estimating that to be twice a year. The group that has consistently inflamed this entire topic, is in my opinion, exaggerating. They are attempting to strong-arm Grimm's into doing their bidding, and it is wrong. Grimm's provides a valuable service to the public, and they have been in their location much longer than the rest of us. I see no problems with improvements and innovation, but not to the point, that it will curtail this business from being profitable, or making it cease to operate. I am not technically knowledgeable enough to offer any comments on the groups demands, however, I am frustrated that they are painting the picture of the population around Grimm's as all being in agreement with their demands. We are not.

Carole Moore  
17052 SW Eldorado Dr.  
Tigard, OR 97224

---

**From:** [Metro Solid Waste Compliance](#)  
**To:**  
**Subject:** RE: in support of Grimms  
**Date:** Tuesday, November 27, 2018 6:07:00 PM

---

Hello,

Thank you for your comment. Metro will respond to comments in the staff report, which will be available online as an update to the [Grimm's Fuel Company public notice webpage](#) after the close of the public comment period.

Thanks,

\*Hila

**Hila Ritter**

Solid Waste Authorization Coordinator  
Property and Environmental Services  
*My gender pronouns: she, her, hers.*

Metro | [oregonmetro.gov](http://oregonmetro.gov)

[600 NE Grand Ave.](#)

Portland, OR 97232-2736

[503-797-1862](tel:503-797-1862)

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**From:**  
**Sent:** Tuesday, November 27, 2018 5:59 PM  
**To:** Metro Solid Waste Compliance <[SWICC@oregonmetro.gov](mailto:SWICC@oregonmetro.gov)>  
**Subject:** in support of Grimms

Grimms fuel has been at their location for many, many years.  
The people who are complaining about odors must be new.  
They should have scoped out the area before they bought a home near a facility like Grimms.

Grimms is doing a great job – leave them alone.

Sent from [Mail](#) for Windows 10

Paul Wheatcraft long time Tualatin resident (33 years)

**From:** [Hila Ritter](#)  
**To:**  
**Cc:** [Duane Altig](#); [Eric Crandal](#)  
**Subject:** RE: Grimm's Relentless Stench Continues After Thanksgiving  
**Date:** Tuesday, November 27, 2018 6:08:00 PM

---

Hello Julie,

Thank you for your comment. Metro will respond to comments in the staff report, which will be available online as an update to the [Grimm's Fuel Company public notice webpage](#) after the close of the public comment period.

The odor dates that you have submitted will also be recorded.

Thanks,

\*Hila

**Hila Ritter**

Solid Waste Authorization Coordinator

Property and Environmental Services

*My gender pronouns: she, her, hers.*

Metro | [oregonmetro.gov](http://oregonmetro.gov)

[600 NE Grand Ave.](#)

Portland, OR 97232-2736

[503-797-1862](tel:503-797-1862)

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

From:

Sent: Tuesday, November 27, 2018 5:09 PM

To: Hila Ritter <[Hila.Ritter@oregonmetro.gov](mailto:Hila.Ritter@oregonmetro.gov)>; Duane Altig <[Duane.Altig@oregonmetro.gov](mailto:Duane.Altig@oregonmetro.gov)>;

Subject: Grimm's Relentless Stench Continues After Thanksgiving

This report includes everyday since the report I made on Thanksgiving Day. The stench has been terrible every afternoon - ALL afternoon long and it is especially bad right now! Exactly WHEN will the stench and dust be fully controlled?

I suggest you move compliance dates for the proposed license to dates much sooner than suggested rather than the later dates Metro has proposed. Metro should provide dump trucks and start hauling this horrid compost to locations far from residential, business, hospital, nursing home and school zones. Please add these comments to the public comments that are taken until November 30th

The dates are as follows:

1. 11-23-18
2. 11-24-18
3. 11-25-18
4. 11-26-18

5. 11-27-18

Julie

## Eric Crandall

---

**From:** Metro Solid Waste Compliance  
**Sent:** Friday, November 30, 2018 8:13 AM  
**To:** Anna Woll; Metro Solid Waste Compliance  
**Subject:** RE: Compost Smell

Hello,

Thanks for your comment. Metro will respond to comments in the staff report, which will be available online as an update to the Grimm's Fuel Company [public notice webpage](#) after the close of the public comment period.

Thanks again,  
Eric

[Eric Balbin Crandall](#)  
Oregon Metro | [OregonMetro.Gov](#)  
Program Assistant for SWICC and cPMO Offices  
503-797-1662  
Eric's in the office: M-F 8-4:30

---

**From:**  
**Sent:** Wednesday, November 28, 2018 4:15 AM  
**To:** Metro Solid Waste Compliance  
**Subject:** Compost Smell

It is my understanding that you are currently taking public comment relative to the odor caused by the compost pile at Grimm's Fuel.

I don't honestly know where it is, but I live near the Fred Meyer in Tualatin and work in Lake Oswego near Bridgeport mall. On bad days I can smell this as work and very strongly at home.

The odor is an extremely unpleasant sour odor, not dissimilar from a soiled diaper.

The odor causes me to stay indoors, and my child does not wish to play outdoors.

The largest issue for me is that I am a sufferer of migraines, which are triggered often by strong smells such as food odors and strong perfumes. On days when the smell is very strong it will trigger a migraine, which can keep me in bed for as many as three days.

When we moved to Tualatin 8 years ago this wasn't an issue. I don't remember smelling this odor until the last 2 years.

I believe composting is a fantastic resource, but it seems that if they have been doing this for years and the odor issues have only started in the last 2, they need to reevaluate and figure out when they jumped the shark.

Thank you for your time,  
Anna Woll

## Eric Crandall

---

**From:** Metro Solid Waste Compliance  
**Sent:** Friday, November 30, 2018 8:14 AM  
**To:** Wendy; Metro Solid Waste Compliance  
**Subject:** RE: Grimm's

Hello,

Thanks for your comment. Metro will respond to comments in the staff report, which will be available online as an update to the Grimm's Fuel Company [public notice webpage](#) after the close of the public comment period.

Thanks again,  
Eric

Eric Balbin Crandall  
Oregon Metro | OregonMetro.Gov  
Program Assistant for SWICC and cPMO Offices  
503-797-1662  
Eric's in the office: M-F 8-4:30

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

**From:**  
**Sent:** Wednesday, November 28, 2018 6:22 AM  
**To:** Metro Solid Waste Compliance  
**Subject:** Grimm's

Hello

I have lived close to Grimm's for over 20 years. ( under 2 miles as the crow flies). I do not find any big issue with their process. A little tweak I can't hurt but I'm good

Thanks  
Wendy

Sent from Wendy's iPhone



## Eric Crandall

---

**From:** Metro Solid Waste Compliance  
**Sent:** Friday, November 30, 2018 8:15 AM  
**To:** Dena Iadanza; Metro Solid Waste Compliance  
**Subject:** RE: Grimm's Fuel's Co.

Hello,

Thanks for your comment. Metro will respond to comments in the staff report, which will be available online as an update to the Grimm's Fuel Company [public notice webpage](#) after the close of the public comment period.

Thanks again,  
Eric

[Eric Balbin Crandall](#)  
Oregon Metro | [OregonMetro.Gov](#)  
Program Assistant for SWICC and cPMO Offices  
503-797-1662  
Eric's in the office: M-F 8-4:30

**From:**  
**Sent:** Wednesday, November 28, 2018 6:36 AM  
**To:** Metro Solid Waste Compliance  
**Subject:** Grimm's Fuel's Co.

Hello,

I live in Tualatin and the stench from Grimm's is horrific and not at all acceptable. Here is a summary of demands from myself and the people of Tualatin.

- Require citizen input for approval of the Operating Plan.
- Require no offsite odors.
- Replace "minimize offsite odors" with "prevent offsite odors".
- The License must include only objective, measurable conditions.
- Require 10% minimum oxygen level at all times.
- Stop accepting new feedstocks if oxygen level falls below 5%.
- Set the License term at 2 years.
- Limit input volume to 35,000 tons per year.
- Provide a Nasal Ranger for community use.
- Provide funding for Nasal Ranger training and certification.
- Require third-party odor monitoring and odor incident response.
- Track and record air flow and pressure drop in all air blowers.
- Require that all composting operations meet PFRP.
- Citizen representatives at any meetings between Metro and Grimm's.
- No last-minute changes to Metro License prior to issuance.

Thank you for your consideration.

Dena and Chris Iadanza  
10145 SW 102nd Ct  
Tualatin, OR 97062

## Eric Crandall

---

**From:** Metro Solid Waste Compliance  
**Sent:** Friday, November 30, 2018 8:15 AM  
**To:** Todd Garcia; Metro Solid Waste Compliance  
**Subject:** RE: Grimm's Fuel feedback

Hello,

Thanks for your comment. Metro will respond to comments in the staff report, which will be available online as an update to the Grimm's Fuel Company [public notice webpage](#) after the close of the public comment period.

Thanks again,  
Eric

[Eric Balbin Crandall](#)  
Oregon Metro | [OregonMetro.Gov](#)  
Program Assistant for SWICC and cPMO Offices  
503-797-1662  
Eric's in the office: M-F 8-4:30

---

**From:**  
**Sent:** Wednesday, November 28, 2018 7:44 AM  
**To:** Metro Solid Waste Compliance  
**Subject:** Grimm's Fuel feedback

Please add my comments to the discussion/plans for Grimm's Fuel going forward.

Firstly, I'm grateful for Grimm's composting operations and their willingness to address the odor problem. They understand the issue and its affect on surrounding communities.

Still, the fact remains that the odor problem gets worse every year in our neighborhood (Tigard). Whatever steps Grimm's has taken to date have not been effective. So, it's time for local government to step in and restore the conditions that have made our residential areas so appealing for so long.

To that end, I'm requesting that Metro put some real teeth in their proposed operating license. Examples include:

- Require composting operations be much farther away from residential areas (e.g. 10+ miles)
- Institute licenses that require the operator to meet all odor requirements with routine inspections
- Institute a limit on odor complaints within a calendar year that automatically trigger a shut down of operations until the problem is corrected

Requirements like these may seem draconian. But from my perspective, they are not. Our area is slowly becoming as bad as Camas WA with its paper mill odor. This brings down property values, raises health concerns, and increases citizen anxiety.

Yes, Grimm's is upgrading it's operations with filter systems and reducing pile size. But, what assurances do we have that this will be enough? All I know is that the license should address the odor specifically among other requirements like fire risk, airborne health risks, etc.. Grimm's is smart enough to figure out how to achieve these requirements and still maintain a profitable business.

Finally, only the text in the operating license can give the citizens leverage to combat this problem now and in the future. We may not always be dealing with a company as easy to work with as Grimm's Fuel is today. Please protect our future while you have the chance. Local government doesn't always have to be reactive. It can be proactive too.

Thanks for your time! And thanks for publishing meeting notes on the Metro site. That's very helpful.

Todd Garcia  
Private citizen

## Eric Crandall

---

**From:** Metro Solid Waste Compliance  
**Sent:** Friday, November 30, 2018 8:16 AM  
**To:** Leland Richey; Metro Solid Waste Compliance  
**Subject:** RE: Grimms

Hello,

Thanks for your comment. Metro will respond to comments in the staff report, which will be available online as an update to the Grimm's Fuel Company [public notice webpage](#) after the close of the public comment period.

Thanks again,  
Eric

[Eric Balbin Crandall](#)  
Oregon Metro | [OregonMetro.Gov](#)  
Program Assistant for SWICC and cPMO Offices  
503-797-1662  
Eric's in the office: M-F 8-4:30

**From:**  
**Sent:** Wednesday, November 28, 2018 10:11 AM  
**To:** Metro Solid Waste Compliance  
**Subject:** Grimms

Hello:

Before taking any more action regarding modifying *Grimms* permit, I would like the following concerns to be addressed publicly:

- 1: what specific health issue(s) do citizens face that can be traced solely to *Grimm's*?
- 2: What dollar amount of reduced property value can be documented and in what specific neighborhoods due to the presence of *Grimm's*?
- 3: How many days each year is the odor from *Grimm's* a problem and how many citizens are affected by it?
- 4: What specific reason(s) were provided by *Grimm's* for not applying for the \$500,000.00 grant available from Metro?

These are all questions that I have a concern about due to several public discussions recently on the Nextdoor app. I think Metro needs to quantify some of the issues and weigh the outcome benefits against the community and specific business cost before making any major changes to *Grimms* permit.

Lee Richey  
17911 SW 105th Court

Tualatin, OR 97062

## Eric Crandall

---

**From:** Metro Solid Waste Compliance  
**Sent:** Friday, November 30, 2018 8:16 AM  
**To:** Chad Bentley; Metro Solid Waste Compliance  
**Subject:** RE: Grimm's Fuel Metro License Renewal

Hello,

Thanks for your comment. Metro will respond to comments in the staff report, which will be available online as an update to the Grimm's Fuel Company [public notice webpage](#) after the close of the public comment period.

Thanks again,  
Eric

[Eric Balbin Crandall](#)  
Oregon Metro | [OregonMetro.Gov](#)  
Program Assistant for SWICC and cPMO Offices  
503-797-1662  
Eric's in the office: M-F 8-4:30

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**From:**  
**Sent:** Wednesday, November 28, 2018 12:00 PM  
**To:** Metro Solid Waste Compliance  
**Subject:** Grimm's Fuel Metro License Renewal

To whom it may concern,  
Hardwood Industries Inc. fully supports the renewal of Grimm's fuel License renewal.  
They are an important part of our business and not having a facility near us would greatly impact our business operation.

Thanks

### **Hardwood Industries Inc.**

Chad Bentley  
Operations Manager  
20548 SW Wildrose Place  
Sherwood Or 97140  
503-849-5204 Cell  
503-692-6620 Ext 1126  
503-217-3235 DIR dial  
503-692-3906 fax

<http://hardwoodind.com/>

## Eric Crandall

---

**From:** Metro Solid Waste Compliance  
**Sent:** Friday, November 30, 2018 8:17 AM  
**To:** Rob Steffeck; Metro Solid Waste Compliance  
**Subject:** RE: Grimm's Composting

Hello,

Thanks for your comment. Metro will respond to comments in the staff report, which will be available online as an update to the Grimm's Fuel Company [public notice webpage](#) after the close of the public comment period.

Thanks again,  
Eric

[Eric Balbin Crandall](#)  
Oregon Metro | [OregonMetro.Gov](#)  
Program Assistant for SWICC and cPMO Offices  
503-797-1662  
Eric's in the office: M-F 8-4:30

---

**From:**  
**Sent:** Wednesday, November 28, 2018 12:42 PM  
**To:** Metro Solid Waste Compliance  
**Subject:** Grimm's Composting

Grimm's is integral to our community and the composting operation is at its core. Please renew their license to keep their operation going. There is a very vocal minority that feels their operation is a detriment to the area. I vehemently disagree with that premise.

Sincerely,  
Robert Steffeck  
27712 SW Grahams Ferry Rd  
Sherwood, OR 97140



## Eric Crandall

---

**From:** Metro Solid Waste Compliance  
**Sent:** Friday, November 30, 2018 8:17 AM  
**To:** Robbert van Andel; Metro Solid Waste Compliance  
**Subject:** RE: Grimm's Fuel Company

Hello,

Thanks for your comment. Metro will respond to comments in the staff report, which will be available online as an update to the Grimm's Fuel Company [public notice webpage](#) after the close of the public comment period.

Thanks again,  
Eric

[Eric Balbin Crandall](#)  
Oregon Metro | [OregonMetro.Gov](#)  
Program Assistant for SWICC and cPMO Offices  
503-797-1662  
Eric's in the office: M-F 8-4:30

**From:**  
**Sent:** Wednesday, November 28, 2018 12:53 PM  
**To:** Metro Solid Waste Compliance  
**Subject:** Grimm's Fuel Company

To whom it may concern,

I'm writing in support of Grimm's Fuel Company. I have heard over the last year people complaining about this facility. I live close to Grimm's and drive by it everyday. While there is an odor that comes from the facility, it has never been so bad that I think "wow, that's awful." The complaints about the smell have been, in my opinion, greatly over-exaggerated.

Thank you,  
Robbert van Andel  
20401 SW Seely Ln,  
Sherwood, OR 97140

## Eric Crandall

---

**From:** Metro Solid Waste Compliance  
**Sent:** Friday, November 30, 2018 8:18 AM  
**To:** 'Christina Wallace'; Metro Solid Waste Compliance  
**Subject:** RE: Grimm's Fuel Company

Hello,

Thanks for your comment. Metro will respond to comments in the staff report, which will be available online as an update to the Grimm's Fuel Company [public notice webpage](#) after the close of the public comment period.

Thanks again,  
Eric

Eric Balbin Crandall  
Oregon Metro | OregonMetro.Gov  
Program Assistant for SWICC and cPMO Offices  
503-797-1662  
Eric's in the office: M-F 8-4:30

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

**From:**  
**Sent:** Wednesday, November 28, 2018 1:00 PM  
**To:** Metro Solid Waste Compliance  
**Subject:** Grimm's Fuel Company

To Whom It May Concern:

I would like to comment that I support a common sense solution to the composting at Grimm's Fuel. Please work with them to allow for composting of yard waste, as having neighbors doing it would just move the mess and smell elsewhere, or fill our landfills with yard debris. Composting is the better alternative.

Sincerely,

Christina Wallace  
23852 SW Dewberry Pl  
Sherwood, OR 97140

## Eric Crandall

---

**From:** Metro Solid Waste Compliance  
**Sent:** Friday, November 30, 2018 8:19 AM  
**To:** Wendy Wells; Metro Solid Waste Compliance  
**Subject:** RE: Grimms Fuel Company

Hello,

Thanks for your comment. Metro will respond to comments in the staff report, which will be available online as an update to the Grimm's Fuel Company [public notice webpage](#) after the close of the public comment period.

Thanks again,  
Eric

[Eric Balbin Crandall](#)  
Oregon Metro | [OregonMetro.Gov](http://OregonMetro.Gov)  
Program Assistant for SWICC and cPMO Offices  
503-797-1662  
Eric's in the office: M-F 8-4:30

**From:**  
**Sent:** Wednesday, November 28, 2018 1:01 PM  
**To:** Metro Solid Waste Compliance  
**Subject:** Grimms Fuel Company

Hello,  
I understand the Metro License for Grimms is coming up for renewal and I encourage you to renew it. I have lived in Sherwood for 30 years and have been pleased to do business with this company. We need jobs in our area and need to encourage local businesses like this in our community. Thank you for your consideration of my request to renew their license!

Wendy Wells

## Eric Crandall

---

**From:** Metro Solid Waste Compliance  
**Sent:** Friday, November 30, 2018 8:19 AM  
**To:** kilosteve; Metro Solid Waste Compliance  
**Subject:** RE: Grimm's Fuel license

Hello,

Thanks for your comment. Metro will respond to comments in the staff report, which will be available online as an update to the Grimm's Fuel Company [public notice webpage](#) after the close of the public comment period.

Thanks again,  
Eric

[Eric Balbin Crandall](#)  
Oregon Metro | [OregonMetro.Gov](#)  
Program Assistant for SWICC and cPMO Offices  
503-797-1662  
Eric's in the office: M-F 8-4:30

---

**From:**  
**Sent:** Wednesday, November 28, 2018 1:15 PM  
**To:** Metro Solid Waste Compliance  
**Subject:** Grimm's Fuel license

I and my company heartily support keeping Grimm's Fuel in place . We've been doing business with them for almost 30 years. As far as I know, they were there before their antagonists and I don't see what the problem is. For us, the loss of a convenient site to drop yard debris would be costly in time and have a negative impact on our business. Grimm's is also our source of quality mulch and specialty soil mixes.

Sincerely, Steven Farrar  
Sole prop. Kilohana Lanscape  
Maintenance

Sent from my Verizon, Samsung Galaxy smartphone

## Eric Crandall

---

**From:** Metro Solid Waste Compliance  
**Sent:** Friday, November 30, 2018 8:20 AM  
**To:** Chloe Harris; Metro Solid Waste Compliance  
**Subject:** RE: Grimm's Fuel

Hello,

Thanks for your comment. Metro will respond to comments in the staff report, which will be available online as an update to the Grimm's Fuel Company [public notice webpage](#) after the close of the public comment period.

Thanks again,  
Eric

Eric Balbin Crandall  
Oregon Metro | OregonMetro.Gov  
Program Assistant for SWICC and cPMO Offices  
503-797-1662  
Eric's in the office: M-F 8-4:30

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

**From:**  
**Sent:** Wednesday, November 28, 2018 1:15 PM  
**To:** Metro Solid Waste Compliance  
**Subject:** Grimm's Fuel

To whom it may concern,

I wanted to send an email showing my support for Grimm's Fuel. My family has been using their services for decades and will continue to over the coming years. They are a great local company.

It has come to my attention that a small group of locals are trying to keep Grimm's from renewing their metro license. I plead with you to not let this small group ruin a good business run by a local family. Please call me if you have any questions.

Thank you,

Chloe Harris

## Eric Crandall

---

**From:** Metro Solid Waste Compliance  
**Sent:** Friday, November 30, 2018 8:20 AM  
**To:** Brenda Martin; Metro Solid Waste Compliance  
**Subject:** RE: Grimm's fuel company

Hello,

Thanks for your comment. Metro will respond to comments in the staff report, which will be available online as an update to the Grimm's Fuel Company [public notice webpage](#) after the close of the public comment period.

Thanks again,  
Eric

[Eric Balbin Crandall](#)  
Oregon Metro | [OregonMetro.Gov](#)  
Program Assistant for SWICC and cPMO Offices  
503-797-1662  
Eric's in the office: M-F 8-4:30

**From:**  
**Sent:** Wednesday, November 28, 2018 1:20 PM  
**To:** Metro Solid Waste Compliance  
**Subject:** Grimm's fuel company

To whom it may concern:

Please consider renewing Grimm fuel's license to continue to compost.

Metro and Deq knows the importance to continue to offer this service.

A few people are upset, but even more want to be able to compost and keep Oregon Green! If consumers have no options it will fall on the cities to come up with additional funds.

Thank you,  
Brenda Martin

## Eric Crandall

---

**From:** Metro Solid Waste Compliance  
**Sent:** Friday, November 30, 2018 8:21 AM  
**To:** Gail Cutsforth; Metro Solid Waste Compliance  
**Subject:** RE: Grimm's

Hello,

Thanks for your comment. Metro will respond to comments in the staff report, which will be available online as an update to the Grimm's Fuel Company [public notice webpage](#) after the close of the public comment period.

Thanks again,  
Eric

[Eric Balbin Crandall](#)  
Oregon Metro | [OregonMetro.Gov](#)  
Program Assistant for SWICC and cPMO Offices  
503-797-1662  
Eric's in the office: M-F 8-4:30

**From:**  
**Sent:** Wednesday, November 28, 2018 1:36 PM  
**To:** Metro Solid Waste Compliance  
**Subject:** Grimm's

I know, its just yard debris. But seriously, Grimm's has been an amazing community partner since long before my family even moved to Sherwood. They support our local causes and donate to our fundraisers. They provide a necessary service to the region encompassing tens of thousands of households and businesses.

As the volunteer president of the Woodhaven HOA, the largest development in Sherwood with 1049 homes, we (the Board of Directors) are greatly concerned about the possibility of Grimm's being forced to shut down due to Brett Hamilton's assertions and his small vocal group. I'll explain. We have an extensive greenspace throughout Woodhaven and, really, all of Sherwood. We know that the City nor Clean Water Services clear out debris from fallen trees, storm damage, dead vegetation, etc. In fact, when they clear the paths after a storm, they leave all the debris a they consider it natural habitat. Additionally, homeowners that line the greenspaces often dump their lawn clippings and other landscape material into the greenspaces. Our concern is that we will one day have an urban wildfire in the greenspaces with all that fuel on the ground. We have found rudimentary fire rings in the greenspaces from (we're assuming) teens, but we've also had several incidents of homeless folks camping in the spaces too. The recent fires in California only served to heighten our concerns. If Grimm's is forced to close, the next drop off site is so inconveniently located and so far away, esp in ever increasing Metro area traffic, we are afraid we will see an increase in this kind of dumping all over the region. And so it creates this vicious cycle. And fires aren't the only concern - but also reports of beavers, nutria, rats, mice and other rodents...which brings in the next larger predator, more coyotes and, on the outskirts of town, increasing reports of cougars. You see where this is leading? We continue to squeeze the urban habitats of these animals, we give them material to eat and build dens/nests out of, and the population thrives. Now we are talking about endangering our domestic animals, farm animals and even our children. And don't get me started on diseases.

So, for right now, it may just be yard debris piles composting that a handful of homeowners bought homes close to and now want to blame someone else for, but without it, we could really be creating some significantly more serious issues for the region. There must be other means by which we can mitigate the issue and come to compromise on that won't mean running a good and necessary partner out of town.

Thank you for your time and thoughtful consideration of all the issues around this subject.

Regards,  
Gail Cutsforth



## Eric Crandall

---

**From:** Metro Solid Waste Compliance  
**Sent:** Friday, November 30, 2018 8:21 AM  
**To:** Metro Solid Waste Compliance  
**Subject:** RE: Grimm's Fuel Company Composting License Renewal

Hello,

Thanks for your comment. Metro will respond to comments in the staff report, which will be available online as an update to the Grimm's Fuel Company [public notice webpage](#) after the close of the public comment period.

Thanks again,  
Eric

[Eric Balbin Crandall](#)  
Oregon Metro | [OregonMetro.Gov](#)  
Program Assistant for SWICC and cPMO Offices  
503-797-1662  
Eric's in the office: M-F 8-4:30

---

**From:**  
**Sent:** Wednesday, November 28, 2018 1:35 PM  
**To:** Metro Solid Waste Compliance  
**Subject:** Grimm's Fuel Company Composting License Renewal

I support Grimm's and strongly request you renew their license!

I strongly suggest you help them achieve what should be a mutual goal. The people who have arrived in the area (Sherwood as well as surrounding communities) in the last 25 years have created the increase in activity for this family owned business.

The reality is that the area has always, always had 'odors' which include the former pig farm, dairy farm, onion fields all adjacent to Hwy. 99W. In addition the tannery, rendering company, and other businesses had 'odors'. In short, those who move near such businesses such accept what they chose to move near. If the logic is that the area has grown to the point that the two cannot co-exist then the logic is flawed.

We still have an airport in the city of Portland.  
Many other businesses and public use entities that need to exist to support the area they serve. If Grimm's discontinues (license not renewed) the composting where will the material be taken? The emissions to truck the materials to a different area will cause pollution for the areas. Additionally, won't that simply create the same problem in another area?

Personal statistics: I buy Grimm's bark mulch, cedar chips and garden compost. I also take yard debris to Grimm's. I am a 54 year resident of Sherwood and my family is five generations strong in the community. I own a small business. I vote.

Thank you for your time.

Sincerely,

***Marlissa Soderberg***

## Eric Crandall

---

**From:** Metro Solid Waste Compliance  
**Sent:** Friday, November 30, 2018 8:22 AM  
**To:** Jerry Losli; Metro Solid Waste Compliance  
**Subject:** RE: Support Grimes

Hello,

Thanks for your comment. Metro will respond to comments in the staff report, which will be available online as an update to the Grimm's Fuel Company [public notice webpage](#) after the close of the public comment period.

Thanks again,  
Eric

Eric Balbin Crandall  
Oregon Metro | OregonMetro.Gov  
Program Assistant for SWICC and cPMO Offices  
503-797-1662  
Eric's in the office: M-F 8-4:30

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

**From:**  
**Sent:** Wednesday, November 28, 2018 1:37 PM  
**To:** Metro Solid Waste Compliance  
**Subject:** Support Grimes

I support Grimms. Please grant them a license.

Sent from my iPhone  
Jerry losli  
Losli Fence and Deck Pros

<http://www.loslifenceanddeck.com>

## Eric Crandall

---

**From:** Metro Solid Waste Compliance  
**Sent:** Friday, November 30, 2018 8:22 AM  
**To:** Karon Heineman; Metro Solid Waste Compliance  
**Subject:** RE: Grimm's Fuel Company

Hello,

Thanks for your comment. Metro will respond to comments in the staff report, which will be available online as an update to the Grimm's Fuel Company [public notice webpage](#) after the close of the public comment period.

Thanks again,  
Eric

Eric Balbin Crandall  
Oregon Metro | OregonMetro.Gov  
Program Assistant for SWICC and cPMO Offices  
503-797-1662  
Eric's in the office: M-F 8-4:30

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

**From:**  
**Sent:** Wednesday, November 28, 2018 1:45 PM  
**To:** Metro Solid Waste Compliance  
**Subject:** Grimm's Fuel Company

Please renew the Metro License for Grimm's Fuel Company. They are a valued part of our community, providing necessary services to many people. We want them to be a part of our community for years to come.

Thank you, Paul and Karon Heineman  
Sent from my iPad

## Eric Crandall

---

**From:** Metro Solid Waste Compliance  
**Sent:** Friday, November 30, 2018 8:23 AM  
**To:** Julie Galloway; Metro Solid Waste Compliance  
**Subject:** RE: Grimes fuel Sherwood Oregon

Hello,

Thanks for your comment. Metro will respond to comments in the staff report, which will be available online as an update to the Grimm's Fuel Company [public notice webpage](#) after the close of the public comment period.

Thanks again,  
Eric

Eric Balbin Crandall  
Oregon Metro | OregonMetro.Gov  
Program Assistant for SWICC and cPMO Offices  
503-797-1662  
Eric's in the office: M-F 8-4:30

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

**From:**  
**Sent:** Wednesday, November 28, 2018 1:56 PM  
**To:** Metro Solid Waste Compliance  
**Subject:** Grimes fuel Sherwood Oregon

I have lived in Sherwood for 13 years now and have never had an issue with "smell" they are a great company and most of Sherwood respects them and understands that they are doing everything to move forward and make everyone in the community happy... unfortunately there is a small (and I mean small) group in this community that would like to see them gone! I am not part of that small section!! I like having them here and love what they do for the community! Please renew their metro license so they can continue running their successful business and don't take what the small group of citizens say to heart... there are some people in this community that if they don't have anything to complain about they make something up!

Thanks for ur time  
Julie Galloway!!

Sent from my iPhone

## Eric Crandall

---

**From:** Metro Solid Waste Compliance  
**Sent:** Friday, November 30, 2018 8:24 AM  
**To:** Bryan Aalberg; Metro Solid Waste Compliance  
**Subject:** RE: Grimm's Fuel

Hello,

Thanks for your comment. Metro will respond to comments in the staff report, which will be available online as an update to the Grimm's Fuel Company [public notice webpage](#) after the close of the public comment period.

Thanks again,  
Eric

[Eric Balbin Crandall](#)  
Oregon Metro | [OregonMetro.Gov](#)  
Program Assistant for SWICC and cPMO Offices  
503-797-1662  
Eric's in the office: M-F 8-4:30

**From:**  
**Sent:** Wednesday, November 28, 2018 2:17 PM  
**To:** Metro Solid Waste Compliance  
**Subject:** Grimm's Fuel

To whom it may concern,

I would like to show my support for Grimm's Fuel Company. My family has done business with them for years and Grimms has been a staple business in the community during that time. I understand that they are having some issues due to licensing with a vocal minority trying to put them out of business. I am not sure the circumstances, but it is a shame to see another family-owned business that has been doing business in Oregon under scrutiny from what likely amounts to a political interest group that is either promoting themselves or someone to replace Grimms for their own gain and paving the way for yet another faceless corporate conglomerate to take over another mom and pop business in our once great city.

I am hopeful that Grimm can both comply with Metro's standards and survive the onslaught of whatever scrutiny they are under. I admittedly do not fully understand the situation they are in, but I want to show my support for a local business that my family and friends have valued doing business with over the years.

Regards,

Bryan Aalberg

## Eric Crandall

---

**From:** Metro Solid Waste Compliance  
**Sent:** Friday, November 30, 2018 8:24 AM  
**To:** deb kersey; Metro Solid Waste Compliance  
**Subject:** RE: Grimms

Hello,

Thanks for your comment. Metro will respond to comments in the staff report, which will be available online as an update to the Grimm's Fuel Company [public notice webpage](#) after the close of the public comment period.

Thanks again,  
Eric

Eric Balbin Crandall  
Oregon Metro | OregonMetro.Gov  
Program Assistant for SWICC and cPMO Offices  
503-797-1662  
Eric's in the office: M-F 8-4:30

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

**From:**  
**Sent:** Wednesday, November 28, 2018 2:32 PM  
**To:** Metro Solid Waste Compliance  
**Subject:** Grimms

I live on property owned by Metro, less than half a mile from Grimms and I love Grimms and all the services they provide. As I said I live closer than most people and I am 100% in support of Grimms composting just as they always have.

Debbie Kersey

Sent from my iPhone

## Eric Crandall

---

**From:** Metro Solid Waste Compliance  
**Sent:** Friday, November 30, 2018 8:25 AM  
**To:** Chris Elkins; Metro Solid Waste Compliance  
**Subject:** RE: Grimm's Fuel Complaints

Hello,

Thanks for your comment. Metro will respond to comments in the staff report, which will be available online as an update to the Grimm's Fuel Company [public notice webpage](#) after the close of the public comment period.

Thanks again,  
Eric

[Eric Balbin Crandall](#)  
Oregon Metro | [OregonMetro.Gov](#)  
Program Assistant for SWICC and cPMO Offices  
503-797-1662  
Eric's in the office: M-F 8-4:30

---

**From:** Chris Elkins [mailto:ec.elkins68@gmail.com]  
**Sent:** Wednesday, November 28, 2018 3:05 PM  
**To:** Metro Solid Waste Compliance  
**Subject:** Grimm's Fuel Complaints

To Whom It May Concern,

I wanted to reach out to you to voice my support for Grimm Fuel Company. It's come to my attention that a very small group of Tualatin residents have organized a petition asking Metro to impose new compliance requirements, specifically around odor control, with Grimm's operating license renewal.

I've lived in Sherwood for 15 years, and have been a Grimm's customer for many years. I've found Grimm's to be great neighbors, great stewards of the environment and community, and an exemplary example of what small business can and should be. Having been part of the campaign to recall our former mayor and city councilors, I completely support the right of citizens to voice dissent and petition for change, and if Grimm's is in violation of state or federal laws they should be compliant with those. HOWEVER, I find Metro's encouragement and support of these complaints troubling, and a waste of the public's resources.

The community needs not just businesses like Grimm's, but specifically Grimm's - experienced operators who serve the public's interest. Please re-consider your continued support of this small group of complaining citizens. Thank you in advance,

Chris Elkins  
15873 SW Oriole Ct.  
Sherwood, OR. 97140



## Eric Crandall

---

**From:** Metro Solid Waste Compliance  
**Sent:** Friday, November 30, 2018 8:26 AM  
**To:** Bill Carver; Metro Solid Waste Compliance  
**Cc:** grimmsfuel@yahoo.com  
**Subject:** RE: Grimm's Fuel Metro License Renewal Comments

Hello,

Thanks for your comment. Metro will respond to comments in the staff report, which will be available online as an update to the Grimm's Fuel Company [public notice webpage](#) after the close of the public comment period.

Thanks again,  
Eric

[Eric Balbin Crandall](#)  
Oregon Metro | [OregonMetro.Gov](#)  
Program Assistant for SWICC and cPMO Offices  
503-797-1662  
Eric's in the office: M-F 8-4:30

---

**From:**  
**Sent:** Wednesday, November 28, 2018 3:10 PM  
**To:** Metro Solid Waste Compliance  
**Cc:**  
**Subject:** Grimm's Fuel Metro License Renewal Comments

November 28, 2018

Re: Grimm's Fuel - Metro License Renewal Comments

Dear Oregon Metro:

My name is Bill Carver and I have lived in Tigard, Oregon for nearly 50 years and have been a long-time customer of Grimm's Fuel Company at their Cipole Road, Tualatin location. I have received notice that Grimm's Fuel is looking to renew their Metro License and you are seeking public comment regarding their application.

I am an OSU Master Gardener and believe they provide a very valuable resource to both commercial landscaping companies and home gardening enthusiasts, such as myself. They take material that would otherwise end up in the landfills. I am a total believer in recycling and visit their facility several times a month during the growing season to off-load my garden debris and to purchase the by-products they produce from the material others have also delivered to them. Where else would I take this material that doesn't need to fill a landfill?

I understand there is always opposition to facilities such as Grimm's, but those who develop near these types of operations must know what they are building near and it shouldn't come as a surprise when the fragrance of composting material is in the air. It's better than the methane gas from landfills. Can you imagine what the landfills would look like should this natural material have to be simply dumped? They would be overwhelmed. Composting is a science and it takes a diligent operation to keep the aroma under control. I understand as I compost at home too. I know that the management of Grimm's understands this and is working hard at mitigating the circumstances that might cause some frustration to those in the surrounding area.

This facility is vital to our local area and it's used by any number of businesses and individuals, such as myself, as a place to recycle organic and household garden debris. Should there be standards for Grimm's to follow, yes of course, but I am confident that they are working hard to make this a clean operation. It's composting that they've done for many years in the same location. Shutting it down or making the regulations so onerous they can't comply, is not the answer.

I do hope you give full consideration to Grimm's Fuel application and renew their permit. They are a valued part of our recycling community and have a long history of excellent work and providing employment to a number of my fellow citizens.

Thank you,

Bill Carver  
10155 SW Hoodview Dr.  
Tigard, OR 97224

## Eric Crandall

---

**From:** Metro Solid Waste Compliance  
**Sent:** Friday, November 30, 2018 8:26 AM  
**To:** LuAnne WELLS; Metro Solid Waste Compliance  
**Subject:** RE: Grimm's Fuels

Hello,

Thanks for your comment. Metro will respond to comments in the staff report, which will be available online as an update to the Grimm's Fuel Company [public notice webpage](#) after the close of the public comment period.

Thanks again,  
Eric

[Eric Balbin Crandall](#)  
Oregon Metro | [OregonMetro.Gov](#)  
Program Assistant for SWICC and cPMO Offices  
503-797-1662  
Eric's in the office: M-F 8-4:30

---

**From:** **Sent:** Wednesday, November 28, 2018 3:23 PM  
**To:** Metro Solid Waste Compliance  
**Subject:** Grimm's Fuels

Hello, please find attached for your perusal, the position of the Oregon Air group regarding the licensing of Grimm's Fuels. I have lived in Tualatin for almost 12 years now, and never have the odors from Grimm's been so strong and long lasting. How does one get to appreciate their yards, walks to the parks when there is a very heavy stinky odor hanging in the air? The answer to that is anyone that is sensitive to the odors, they can not. It is unfair of Grimm's to not be a good neighbor and do all they can to address this issue. Upping their intake availability and not asking them to monitor the odors is an injustice to the community. We live here because of the many amenities this area offers, but if we're unable to enjoy them then someone needs to be accountable.

It is up to Metro & the DEQ to ensure the safety of the communities they serve. I do not believe our demands are out of line with air quality standards. Everyone deserves to breathe clean air without worry of health concerns, now or in the future.

No one is asking for Grimm's to be shut down or go out of business, being a good neighbor and reaching out to the community is what makes communities work.

Thank you for your time and consideration,

Sincerely,

LuAnne Wells

Tualatin resident

<http://www.oregonair.org/position>

## Eric Crandall

---

**From:** Metro Solid Waste Compliance  
**Sent:** Friday, November 30, 2018 8:27 AM  
**To:** Luxe 2Point0; Metro Solid Waste Compliance  
**Subject:** RE: Grimm's Fuel Company Metro License Renewal

Hello,

Thanks for your comment. Metro will respond to comments in the staff report, which will be available online as an update to the Grimm's Fuel Company [public notice webpage](#) after the close of the public comment period.

Thanks again,  
Eric

[Eric Balbin Crandall](#)  
Oregon Metro | [OregonMetro.Gov](#)  
Program Assistant for SWICC and cPMO Offices  
503-797-1662  
Eric's in the office: M-F 8-4:30

---

**From:**  
**Sent:** Wednesday, November 28, 2018 3:23 PM  
**To:** Metro Solid Waste Compliance  
**Subject:** Grimm's Fuel Company Metro License Renewal

To Whom It May Concern:

I am a resident of Sherwood, a loyal customer of Grimm's, and wish to voice my support for their license renewal. They provide an invaluable service and we rather purchase locally from a long standing, trusted small business than Home Depot or the like.

I understand there is a group of people fighting against the renewal which is quite unfortunate. I'm sorry they don't care for the odor, but this is not new. Grimm's was standing long before that development and it's not as if their operation was a secret. Everyone makes choices and if they didn't want to be adjacent to that business, that was for them to decide. It's not fair for someone to make a decision then expect the world to bend for them. Grimm's is a long established business, and closing would negatively financially impact them as well as the city of Sherwood, Please renew Grimm's license.

Thank you for your time and consideration.

Respectfully,  
Jean Steffek

## Eric Crandall

---

**From:** Metro Solid Waste Compliance  
**Sent:** Friday, November 30, 2018 8:27 AM  
**To:** Lori Heironimus; Metro Solid Waste Compliance  
**Subject:** RE: Grimm's Fuel company

Hello,

Thanks for your comment. Metro will respond to comments in the staff report, which will be available online as an update to the Grimm's Fuel Company [public notice webpage](#) after the close of the public comment period.

Thanks again,  
Eric

[Eric Balbin Crandall](#)  
Oregon Metro | [OregonMetro.Gov](#)  
Program Assistant for SWICC and cPMO Offices  
503-797-1662  
Eric's in the office: M-F 8-4:30

---

**From:**  
**Sent:** Wednesday, November 28, 2018 3:45 PM  
**To:** Metro Solid Waste Compliance  
**Subject:** Grimm's Fuel company

Hi,  
I would support renewing the license for Grimm's. I appreciate being able to take debris there for composting. Plus they are my source for composting material for my yard. They are easy to work with and professional.

I believe they offer an important service to our community.

Thank you!  
Lori Heironimus

## Eric Crandall

---

**From:** Metro Solid Waste Compliance  
**Sent:** Friday, November 30, 2018 8:45 AM  
**To:** Lawrence O'Keefe; Metro Solid Waste Compliance  
**Subject:** RE: Grimm's public comment

Hello,

Thanks for your comment. Metro will respond to comments in the staff report, which will be available online as an update to the Grimm's Fuel Company [public notice webpage](#) after the close of the public comment period.

Thanks again,  
Eric

[Eric Balbin Crandall](#)  
Oregon Metro | [OregonMetro.Gov](#)  
Program Assistant for SWICC and cPMO Offices  
503-797-1662  
Eric's in the office: M-F 8-4:30

**From:**  
**Sent:** Wednesday, November 28, 2018 4:12 PM  
**To:** Metro Solid Waste Compliance  
**Subject:** Grimm's public comment

Dear Metro:

I sincerely hope that you would consider renewing Grimm's license for composting materials. They have always served our community well and I'm disappointed that a small vocal group of people who moved into the area knowing full well that the services of Grimm's sometimes has noise and odors that may not be to anyone's liking.

I fully support Grimm's and would like to see them provide their valuable services for years to come, providing they have adequate fire protection and reasonable suppression systems in place.

Sincerely,  
Lawrence O'Keefe  
17744 SW FITCH DR  
SHERWOOD, OR 97140

## Eric Crandall

---

**From:** Metro Solid Waste Compliance  
**Sent:** Friday, November 30, 2018 8:45 AM  
**To:** Meg Boden Alvey; Metro Solid Waste Compliance  
**Subject:** RE: Support of Grimms license renewal

Hello,

Thanks for your comment. Metro will respond to comments in the staff report, which will be available online as an update to the Grimm's Fuel Company [public notice webpage](#) after the close of the public comment period.

Thanks again,  
Eric

[Eric Balbin Crandall](#)  
Oregon Metro | [OregonMetro.Gov](#)  
Program Assistant for SWICC and cPMO Offices  
503-797-1662  
Eric's in the office: M-F 8-4:30

**From:**  
**Sent:** Wednesday, November 28, 2018 4:14 PM  
**To:** Metro Solid Waste Compliance  
**Subject:** Support of Grimms license renewal

I am a community member of Tualatin. I reside at 20900 SW Teton Ave, Tualatin, 97062. **I am very much in support of Grimm's having a renewed license for composting operations.** I reviewed the material from the October 30th community meeting and am in support of the amendments suggested to improve air quality. It is imperative that our cities have composting available to reduce waste but this goal can be met in ways that far lessen the adverse effects on the community.

Thank you,  
Meg

--

Meg Boden Alvey, Psy.D.  
Licensed Psychologist

<https://www.sundstromclinic.com/>

## Eric Crandall

---

**From:** Metro Solid Waste Compliance  
**Sent:** Friday, November 30, 2018 8:46 AM  
**To:** John Platt; Metro Solid Waste Compliance  
**Subject:** RE: Grimm's Comment

Hello,

Thanks for your comment. Metro will respond to comments in the staff report, which will be available online as an update to the Grimm's Fuel Company [public notice webpage](#) after the close of the public comment period.

Thanks again,  
Eric

[Eric Balbin Crandall](#)  
Oregon Metro | [OregonMetro.Gov](#)  
Program Assistant for SWICC and cPMO Offices  
503-797-1662  
Eric's in the office: M-F 8-4:30

**From:**  
**Sent:** Wednesday, November 28, 2018 4:32 PM  
**To:** Metro Solid Waste Compliance  
**Subject:** Grimm's Comment

Just a quick note to indicate my support for Grimm's Fuel. We have enjoyed their high quality products and services at reasonable prices several times over the years.

They are on balance, a strong asset for the community.

John Platt



## Eric Crandall

---

**From:** Metro Solid Waste Compliance  
**Sent:** Friday, November 30, 2018 8:46 AM  
**To:** Spencer Martin; Metro Solid Waste Compliance  
**Subject:** RE: Grimm's Fuel Company

Hello,

Thanks for your comment. Metro will respond to comments in the staff report, which will be available online as an update to the Grimm's Fuel Company [public notice webpage](#) after the close of the public comment period.

Thanks again,  
Eric

[Eric Balbin Crandall](#)  
Oregon Metro | [OregonMetro.Gov](#)  
Program Assistant for SWICC and cPMO Offices  
503-797-1662  
Eric's in the office: M-F 8-4:30

**From:**  
**Sent:** Wednesday, November 28, 2018 5:13 PM  
**To:** Metro Solid Waste Compliance  
**Subject:** Grimm's Fuel Company

Metro,

My name is Spencer Martin and am a Portland area resident. It has come to my attention that it is time for renewal of the Metro license for the local composting business Grimm's Fuel Company. I would like to take a moment and express my support for the license renewal and the company as a whole.

I am currently a practicing civil engineering EIT and have previously worked in the construction industry. I can attest to the importance of the service that Grimm's Fuel Company provides to surrounding residents, businesses, and community.

Please do not let a vocal minority of citizens take away this business. Grimm's Fuel Company is important, necessary, and good for our community.

Thank you for your time,  
Spencer Martin

## Eric Crandall

---

**From:** Metro Solid Waste Compliance  
**Sent:** Friday, November 30, 2018 8:47 AM  
**To:** Brian Powell; Metro Solid Waste Compliance  
**Subject:** RE: Grimes Fuel

Hello,

Thanks for your comment. Metro will respond to comments in the staff report, which will be available online as an update to the Grimm's Fuel Company [public notice webpage](#) after the close of the public comment period.

Thanks again,  
Eric

Eric Balbin Crandall  
Oregon Metro | OregonMetro.Gov  
Program Assistant for SWICC and cPMO Offices  
503-797-1662  
Eric's in the office: M-F 8-4:30

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

**From:**  
**Sent:** Wednesday, November 28, 2018 5:16 PM  
**To:** Metro Solid Waste Compliance  
**Subject:** Grimes Fuel

I am a resident of Sherwood and I would like to show my support for Grimms Fuel. They are a local business that I have personally used numerous times in the past. They do sometimes emit an odor from their composting piles but it is rare and it does not bother or affect my life in a negative way. Please do not fold to the outspoken and extremely aggressive minority voices in this debate and renew their license so they may continue to be a positive business in our community. Thank you for your consideration.

Brian W Powell

Sent from my iPhone

## Eric Crandall

---

**From:** Metro Solid Waste Compliance  
**Sent:** Friday, November 30, 2018 8:47 AM  
**To:** selma broadhurst; Metro Solid Waste Compliance  
**Subject:** RE: Grimm's Composting problem

Hello,

Thanks for your comment. Metro will respond to comments in the staff report, which will be available online as an update to the Grimm's Fuel Company [public notice webpage](#) after the close of the public comment period.

Thanks again,  
Eric

[Eric Balbin Crandall](#)  
Oregon Metro | [OregonMetro.Gov](#)  
Program Assistant for SWICC and cPMO Offices  
503-797-1662  
Eric's in the office: M-F 8-4:30

---

**From:**  
**Sent:** Wednesday, November 28, 2018 5:18 PM  
**To:** Metro Solid Waste Compliance  
**Subject:** Fw: Grimm's Composting problem

**Sent:** Wednesday, November 28, 2018 at 1:30 PM  
**From:**  
**To:** [SWICC@OREGONMETRO.GOV](mailto:SWICC@OREGONMETRO.GOV)  
**Subject:** Grimm's Composting problem

To whom it may concern,

I have heard a small comparative number of complaints emanating from persons who obviously object to the unpleasant composting odor.

When someone moves into a new area, they should check schools, businesses, etc. to find if there are any problems which would make them uncomfortable to unbearable to reside in that location.

It is my understanding that Grimm's is complying, and doing everything possible to make adjustments.

Please let them move forward.

Sincerely,

Selma C. Broadhurst  
Sherwood

## Eric Crandall

---

**From:** Metro Solid Waste Compliance  
**Sent:** Friday, November 30, 2018 8:49 AM  
**To:** Cody Brock; Metro Solid Waste Compliance  
**Subject:** RE: GRIMMS SUPPORT SYSTEM

Hello,

Thanks for your comment. Metro will respond to comments in the staff report, which will be available online as an update to the Grimm's Fuel Company [public notice webpage](#) after the close of the public comment period.

Thanks again,  
Eric

[Eric Balbin Crandall](#)  
Oregon Metro | [OregonMetro.Gov](#)  
Program Assistant for SWICC and cPMO Offices  
503-797-1662  
Eric's in the office: M-F 8-4:30

---

**From:**  
**Sent:** Wednesday, November 28, 2018 6:45 PM  
**To:** Metro Solid Waste Compliance  
**Subject:** GRIMMS SUPPORT SYSTEM

To Whom it May Concern,

I fully support Grimms Fuel. It's a company that has been in business since 1929. That's quite remarkable, if I do say so myself. It's sad that a few people feel the need to complain about a smell of what a company produces. Let's think about it, they accept yard debris from a very large portion of Washington county and Portland metro. They take what every home owner fights to get rid of and turn it in to something every home owner wants in their yard every spring. This is completely ridiculous that this is even taken into consideration, considering they only turn their compost pile 3 times a year. When they put shop up their off of cipole rd there was nothing around. They deserve to stay open and support all of us home owners in the areas. Please take this email into consideration as I fully support a company that is able to stay functioning for everybody in the area.

Thank you,  
Cody Brock

Get [Outlook for Android](#)

## Eric Crandall

---

**From:** Metro Solid Waste Compliance  
**Sent:** Friday, November 30, 2018 8:49 AM  
**To:** Kathy Enders; Metro Solid Waste Compliance  
**Subject:** RE: Grimm's

Hello,

Thanks for your comment. Metro will respond to comments in the staff report, which will be available online as an update to the Grimm's Fuel Company [public notice webpage](#) after the close of the public comment period.

Thanks again,  
Eric

Eric Balbin Crandall  
Oregon Metro | OregonMetro.Gov  
Program Assistant for SWICC and cPMO Offices  
503-797-1662  
Eric's in the office: M-F 8-4:30

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

**From:**  
**Sent:** Wednesday, November 28, 2018 8:28 PM  
**To:** Metro Solid Waste Compliance  
**Subject:** Grimm's

I am writing in support of Grimm's Fuel company. We currently live in Sherwood and prior to that were on Bull Mountain in Tigard for 21 years. have been taking our trimmings from bushes and trees (large items that don't fit in the yard recycling bin) to them for 22 years plus use their compost on our plants and garden in the spring as do many of our neighbors.. They have been a part of the community long before we moved here and should be allowed to stay at their current location.

Kathleen Enders  
17463 SW Stellar Dr  
Sherwood, OR 97140

## Eric Crandall

---

**From:** Metro Solid Waste Compliance  
**Sent:** Friday, November 30, 2018 8:50 AM  
**To:** Metro Solid Waste Compliance  
**Subject:** RE: Grimm's needs to improve their operation ASAP

Hello,

Thanks for your comment. Metro will respond to comments in the staff report, which will be available online as an update to the Grimm's Fuel Company [public notice webpage](#) after the close of the public comment period.

Thanks again,  
Eric

[Eric Balbin Crandall](#)  
Oregon Metro | [OregonMetro.Gov](#)  
Program Assistant for SWICC and cPMO Offices  
503-797-1662  
Eric's in the office: M-F 8-4:30

---

**From:**  
**Sent:** Wednesday, November 28, 2018 8:55 PM  
**To:** Metro Solid Waste Compliance  
**Subject:** Grimm's needs to improve their operation ASAP

I appreciate the work that Metro has done to help Grimm's Fuel ("Operator") improve and modernize their composting operations. I am grateful for the new aerobic composting and monitoring requirements in the proposed Metro License, however, there are number of key areas where the proposed Metro License is not adequate:

**Operating Plan:** We insist that citizen input be required for approval of both the initial Operating Plan and any subsequent changes to the Operating Plan. We request that any operational parameters that can be included directly in the text of the License be so included, rather than being delegated to the Operating Plan, which has not yet been made public.

**No Offsite Odors:** We demand that the Metro License require no offsite odors. We will not tolerate odors in our homes and on our private property. Metro needs to replace the vague language of "minimize offsite odors" with the clear objective language of "prevent offsite odors". All weasel words must be removed from the License. The License must include only objective, measurable conditions.

**Oxygen:** A minimum 10% oxygen level must be required in all parts of the active compost piles at all times, as described in the GMT report. If oxygen levels drop below 10%, immediate corrective action must be taken by Operator to bring oxygen levels back up to 10%. If oxygen levels fall below 5%, Operator must notify Metro immediately, cease accepting incoming feedstocks, and focus all efforts on restoring oxygen levels to the 10% minimum level specified in the GMT report. After such event, Metro must verify that oxygen levels have in fact been restored to their 10% minimum level before Operator may resume accepting incoming feedstocks.

**Time Frame:** We appreciate the due dates that Metro has set in the License for pile height reduction. We propose that all other provisions, requirements, and conditions of the Metro License shall go into full effect on or before 12/31/2019. We request that the term of this new Metro License shall be two (2) years expiring on or before 12/31/2020.

**Input Limit:** Incoming feedstock volumes should be limited to 35,000 tons per year, which will restore production volumes back to their 2013 levels. This input limit must remain in place until the new system has been in operation for one year without offsite dust and/or offsite odor impacts.

**Citizen Odor Monitoring:** We request that Metro provide a Nasal Ranger for community use and provide funding for citizen representatives to be trained and certified for using the Nasal Ranger to monitor offsite odors in residential areas.

**Third Party Odor Monitoring:** The Metro License must require that a third-party odor monitoring service (“Monitor”) be hired to measure and record any and all offsite odors. Monitor must document the location and D/T ratio of these offsite odors. Monitor must be trained and certified to use the Nasal Ranger and must not have any conflicts of interest. Monitor must perform random odor sampling (Day, Night, Morning, and Evening) and must also be available for incident response odor sampling whenever citizen complaints identify offsite odors.

**Flow Rate:** License must require that the Operator monitor, track, and record the air flow rate and pressure drop on all air blowers at the facility.

**PFRP:** License must require, in crystal clear language, that all composting operations at the facility must comply with the Process to Further Reduce Pathogens (PFRP) standards as defined by ORS and EPA.

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

Marius Brisan

## Eric Crandall

---

**From:** Metro Solid Waste Compliance  
**Sent:** Friday, November 30, 2018 8:50 AM  
**To:** Deanna McCord; Metro Solid Waste Compliance  
**Cc:** Joseph Gall  
**Subject:** RE: Grimms Fuel

Hello,

Thanks for your comment. Metro will respond to comments in the staff report, which will be available online as an update to the Grimm's Fuel Company public notice webpage after the close of the public comment period.

Thanks again,  
Eric

Eric Balbin Crandall  
Oregon Metro | OregonMetro.Gov  
Program Assistant for SWICC and cPMO Offices  
503-797-1662  
Eric's in the office: M-F 8-4:30

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

**From:**  
**Sent:** Wednesday, November 28, 2018 9:06 PM  
**To:** Metro Solid Waste Compliance  
**Cc:** Joseph Gall  
**Subject:** Grimms Fuel

I live at 16596 SW 10th Street, Sherwood OR 97140, and have for the last 8 years. I love having a composting facility within a short driving distance from our home. We use Grimms to take all (I mean ALL) our pine needles, we have about 3 truck loads 2-3 times a year. Then we use them for bark dust.

I always struggle when a small group of individuals decide they don't like something and become the most vocal. I understand that the smell can get bad sometimes but it only last a few weeks a year. I drive up and down 99 frequently and would say only about 5% of the time can you smell anything.

People complained when Billet pallets were here saying they were too loud...(look what took its place, a fire marshals nightmare.) People complained when the leather factory was here, they complain about the gun range, the Pride recycling, and the hide disposal. All have their annoyances but most were here before Sherwood blossomed into this town of nearly 20,000 people.

The constant attack on one business that continues to try and walk the EPA line and stay within acceptable levels is very sad. I just hope enough people let you know how much Grimms does for us by giving us easy access to these services than the small amount of complainers.

Thank you for your time,

Deanna McCord



## Eric Crandall

---

**From:** Metro Solid Waste Compliance  
**Sent:** Friday, November 30, 2018 8:51 AM  
**To:** Estelle Keating; Metro Solid Waste Compliance  
**Subject:** RE: Compost

Hello,

Thanks for your comment. Metro will respond to comments in the staff report, which will be available online as an update to the Grimm's Fuel Company [public notice webpage](#) after the close of the public comment period.

Thanks again,  
Eric

[Eric Balbin Crandall](#)  
Oregon Metro | [OregonMetro.Gov](#)  
Program Assistant for SWICC and cPMO Offices  
503-797-1662  
Eric's in the office: M-F 8-4:30

**From:**  
**Sent:** Wednesday, November 28, 2018 9:10 PM  
**To:** Metro Solid Waste Compliance  
**Subject:** Compost

Want to tell you how much we appreciate and depend on your composting service.

*Sent from my Verizon Motorola Droid*

## Eric Crandall

---

**From:** Metro Solid Waste Compliance  
**Sent:** Friday, November 30, 2018 8:51 AM  
**To:** Morgan Luccio; Metro Solid Waste Compliance  
**Subject:** RE: Support for Grimms

Hello,

Thanks for your comment. Metro will respond to comments in the staff report, which will be available online as an update to the Grimm's Fuel Company [public notice webpage](#) after the close of the public comment period.

Thanks again,  
Eric

Eric Balbin Crandall  
Oregon Metro | OregonMetro.Gov  
Program Assistant for SWICC and cPMO Offices  
503-797-1662  
Eric's in the office: M-F 8-4:30

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

**From:**  
**Sent:** Wednesday, November 28, 2018 9:18 PM  
**To:** Metro Solid Waste Compliance  
**Subject:** Support for Grimms

Good Evening,

As a Sherwood resident, I wanted to share my support for Grimm's Composting. I hope they are able to stay in business because their service serves a great purpose to our environment. The benefits to the community definitely outweigh the negative impact of a few.

Morgan Luccio

## Eric Crandall

---

**From:** Metro Solid Waste Compliance  
**Sent:** Friday, November 30, 2018 8:52 AM  
**To:** Metro Solid Waste Compliance  
**Subject:** RE: I support Grimm's Fuel Company

Hello,

Thanks for your comment. Metro will respond to comments in the staff report, which will be available online as an update to the Grimm's Fuel Company [public notice webpage](#) after the close of the public comment period.

Thanks again,  
Eric

[Eric Balbin Crandall](#)  
Oregon Metro | [OregonMetro.Gov](#)  
Program Assistant for SWICC and cPMO Offices  
503-797-1662  
Eric's in the office: M-F 8-4:30

**From:**  
**Sent:** Wednesday, November 28, 2018 9:48 PM  
**To:** Metro Solid Waste Compliance  
**Subject:** I support Grimm's Fuel Company

To whom it may concern:

I am a 12 year resident of Sherwood, Oregon. I am in support of Grimm's Fuel Company and ALL of the services they provide.

Grimm's Fuel Company  
18850 SW Cipole Rd  
Tualatin, OR 97062

Sincerely,

Linda Karceski

## Eric Crandall

---

**From:** Metro Solid Waste Compliance  
**Sent:** Friday, November 30, 2018 8:53 AM  
**To:** Janet Weber; Metro Solid Waste Compliance  
**Subject:** RE: Comments on Metro License for Grimm's Fuel Co.

Hello,

Thanks for your comment. Metro will respond to comments in the staff report, which will be available online as an update to the Grimm's Fuel Company [public notice webpage](#) after the close of the public comment period.

Thanks again,  
Eric

[Eric Balbin Crandall](#)  
Oregon Metro | [OregonMetro.Gov](#)  
Program Assistant for SWICC and cPMO Offices  
503-797-1662  
Eric's in the office: M-F 8-4:30

---

**From:** **Sent:** Wednesday, November 28, 2018 10:14 PM  
**To:** Metro Solid Waste Compliance  
**Subject:** Comments on Metro License for Grimm's Fuel Co.

To Who It May Concern at Metro,

I appreciate the work that Metro has done to help Grimm's Fuel ("Operator") improve and modernize their composting operations. I'm grateful for the new aerobic composting and monitoring requirements in the proposed Metro License, however, there are number of key areas where the proposed Metro License is not adequate. They are as follows:

**Operating Plan:** My neighbors and I insist that citizen input be required for approval of both the initial Operating Plan and any subsequent changes to the Operating Plan. We request that any operational parameters that can be included directly in the text of the License be so included, rather than being delegated to the Operating Plan, which has not yet been made public.

**No Offsite Odors:** My neighbors and I demand that the Metro License require no offsite odors. We will not tolerate odors in our homes and on our private property. Metro needs to replace the vague language of "minimize offsite odors" with the clear objective language of "prevent offsite odors". All weasel words must be removed from the License. The License must include only objective, measurable conditions.

**Oxygen:** A minimum 10% oxygen level must be required in all parts of the active compost piles at all times, as described in the GMT report. If oxygen levels drop below 10%, immediate corrective action must be taken by Operator to bring oxygen levels back up to 10%. If oxygen levels fall below 5%, Operator must notify Metro immediately, cease accepting incoming feedstocks, and focus all efforts on restoring oxygen levels to the 10%

minimum level specified in the GMT report. After such event, Metro must verify that oxygen levels have in fact been restored to their 10% minimum level before Operator may resume accepting incoming feedstocks.

**Time Frame:** My neighbors and I appreciate the due dates that Metro has set in the License for pile height reduction. We propose that all other provisions, requirements, and conditions of the Metro License shall go into full effect on or before 12/31/2019. We request that the term of this new Metro License shall be two (2) years expiring on or before 12/31/2020.

**Input Limit:** Incoming feedstock volumes should be limited to 35,000 tons per year, which will restore production volumes back to their 2013 levels. This input limit must remain in place until the new system has been in operation for one year without offsite dust and/or offsite odor impacts.

**Citizen Odor Monitoring:** My neighbors and I request that Metro provide a Nasal Ranger for community use and provide funding for citizen representatives to be trained and certified for using the Nasal Ranger to monitor offsite odors in residential areas.

**Third Party Odor Monitoring:** The Metro License must require that a third-party odor monitoring service (“Monitor”) be hired to measure and record any and all offsite odors. Monitor must document the location and D/T ratio of these offsite odors. Monitor must be trained and certified to use the Nasal Ranger and must not have any conflicts of interest. Monitor must perform random odor sampling (Day, Night, Morning, and Evening) and must also be available for incident response odor sampling whenever citizen complaints identify offsite odors.

**Flow Rate:** License must require that the Operator monitor, track, and record the air flow rate and pressure drop on all air blowers at the facility.

**PFRP:** License must require, in crystal clear language, that all composting operations at the facility must comply with the Process to Further Reduce Pathogens (PFRP) standards as defined by ORS and EPA.

**Transparency:** My neighbors and I propose that citizen representatives be included in any and all meetings between Metro and Grimm’s. We request that no last-minute changes be made to the proposed Metro License without informing the citizen representatives as to the substance of such changes prior to issuance.

Thank you for your time in reading this. I truly hope that all of these comments will be seriously considered and the appropriate updates will be included in the final version of Grimm's new Licensure.

Sincerely,  
Janet Weber

## Eric Crandall

---

**From:** Metro Solid Waste Compliance  
**Sent:** Friday, November 30, 2018 8:54 AM  
**To:** J Moore; Metro Solid Waste Compliance  
**Subject:** RE: Clarification plan on 5.8 odor from Grimms

Hello,

Thanks for your comment. Metro will respond to comments in the staff report, which will be available online as an update to the Grimm's Fuel Company [public notice webpage](#) after the close of the public comment period.

Thanks again,  
Eric

[Eric Balbin Crandall](#)  
Oregon Metro | [OregonMetro.Gov](#)  
Program Assistant for SWICC and cPMO Offices  
503-797-1662  
Eric's in the office: M-F 8-4:30

**From:**  
**Sent:** Wednesday, November 28, 2018 10:15 PM  
**To:** Metro Solid Waste Compliance  
**Subject:** Clarification plan on 5.8 odor from Grimms

Hi,  
In Sec.5.8 Odor, It mentions an odor minimum plan that would need to be approved by Chief Officer. Does the community have access to this?

There needs to be when there are high wind warning (we had as high as 60 mph), that there be a containment cover.

My experience with this. The odor, the last two years were at times unbearable sewer smell. Since 1989 that I lived directly across from Grimms, these last two years is when the odor was sickening. Before that, it was just a barkdust smell. I don't know what they are doing differently, but I do hope it doesn't cause permanent breathing issues or cancer. A prevention of an outbreak of disease, should impact decisions made right now and should be for the community and not for profit.

Regards,  
June

## Eric Crandall

---

**From:** Metro Solid Waste Compliance  
**Sent:** Friday, November 30, 2018 8:55 AM  
**To:** Eric Chapman; Metro Solid Waste Compliance  
**Subject:** RE: Grimm's Fuel compost license renewal

Hello,

Thanks for your comment. Metro will respond to comments in the staff report, which will be available online as an update to the Grimm's Fuel Company [public notice webpage](#) after the close of the public comment period.

Thanks again,  
Eric

Eric Balbin Crandall  
Oregon Metro | OregonMetro.Gov  
Program Assistant for SWICC and cPMO Offices  
503-797-1662  
Eric's in the office: M-F 8-4:30

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

**From:**  
**Sent:** Wednesday, November 28, 2018 11:06 PM  
**To:** Metro Solid Waste Compliance  
**Subject:** Grimm's Fuel compost license renewal

I understand that Grimm's Fuel Company is up for a composting license renewal, and that there is some opposition to it. I've lived in Tualatin for over 15 years. I have used their composting service since the first month my family moved here. Our neighborhood has many, many, trees. They drop lots of dead branches and leafs. I take several pickup loads of debris to Grimm's every spring and again in fall. I think it would be a great loss to the community if they could longer provide that service to us.

Grimm's Fuel composting services is NEEDED, in Tualatin.  
Please renew their license. Thank you for your carefull consideration.

Sincerely  
Eric Chapman

<><

## Eric Crandall

---

**From:** Metro Solid Waste Compliance  
**Sent:** Friday, November 30, 2018 8:55 AM  
**To:** Sharon Roberts; Metro Solid Waste Compliance  
**Subject:** RE: Grimms.

Hello,

Thanks for your comment. Metro will respond to comments in the staff report, which will be available online as an update to the Grimm's Fuel Company [public notice webpage](#) after the close of the public comment period.

Thanks again,  
Eric

Eric Balbin Crandall  
Oregon Metro | OregonMetro.Gov  
Program Assistant for SWICC and cPMO Offices  
503-797-1662  
Eric's in the office: M-F 8-4:30

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

From: Sharon Roberts  
Sent: Thursday, November 29, 2018 6:21 AM  
To: Metro Solid Waste Compliance  
Subject: Grimms.

To whom it may concern:

For the past 2 days the smell from Grimms has been sickening. It is not enough that they don't use modern methods to run their business. If you lived around this air quality you would agree with me. It is embarrassing to explain to visitors what the stench is in this beautiful area, it is unhealthy air to breath, and it makes me feel sick to my stomach. Please advocate they get to modern code for their business.

Thank you,  
Sharon Roberts  
17618 SW Shasta Trail  
Tualatin, Or 97062



## Eric Crandall

---

**From:** Metro Solid Waste Compliance  
**Sent:** Friday, November 30, 2018 8:56 AM  
**To:** Lisa Watson; Metro Solid Waste Compliance  
**Subject:** RE: Grimm's

Hello,

Thanks for your comment. Metro will respond to comments in the staff report, which will be available online as an update to the Grimm's Fuel Company [public notice webpage](#) after the close of the public comment period.

Thanks again,  
Eric

Eric Balbin Crandall  
Oregon Metro | OregonMetro.Gov  
Program Assistant for SWICC and cPMO Offices  
503-797-1662  
Eric's in the office: M-F 8-4:30

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

**From:**  
**Sent:** Thursday, November 29, 2018 6:25 AM  
**To:** Metro Solid Waste Compliance  
**Subject:** Grimm's

Good morning! I have been a Grimm's customer for almost two decades and I am very dismayed to hear that they might not get their license renewed. I grew up in Tualatin and now live in Sherwood, odor has never been an issue. The only time I have ever smelled Grimm's is when I drive past on 99W. Grimm's has been part of our community longer than the new people moving in making a "stink" about their location and products. When making your decision please keep in mind that it isn't long term residents that are complaining and that many of us feel that Grimm's and their services benefit not only the community but our environment.

Thank you,

Lisa Watson  
BS in Exercise Science, George Fox University  
200 RYT Yoga Instructor  
Pilates instructor  
AFAA Group Exercise certified  
SilverSneakers® Instructor

## Eric Crandall

---

**From:** Metro Solid Waste Compliance  
**Sent:** Friday, November 30, 2018 8:56 AM  
**To:** Metro Solid Waste Compliance  
**Subject:** RE: Grimm's fuel company.

Hello,

Thanks for your comment. Metro will respond to comments in the staff report, which will be available online as an update to the Grimm's Fuel Company [public notice webpage](#) after the close of the public comment period.

Thanks again,  
Eric

[Eric Balbin Crandall](#)  
Oregon Metro | [OregonMetro.Gov](#)  
Program Assistant for SWICC and cPMO Offices  
503-797-1662  
Eric's in the office: M-F 8-4:30

**From:**  
**Sent:** Thursday, November 29, 2018 7:30 AM  
**To:** Metro Solid Waste Compliance  
**Subject:** Grimm's fuel company.

Please keep this place open is very important for community to have a place to take yard debris .

[Sent from Yahoo Mail on Android](#)

## Eric Crandall

---

**From:** Metro Solid Waste Compliance  
**Sent:** Friday, November 30, 2018 8:58 AM  
**To:** Wayne Vandekraak; Metro Solid Waste Compliance  
**Subject:** RE: Grimms Fuel

Hello,

Thanks for your comment. Metro will respond to comments in the staff report, which will be available online as an update to the Grimm's Fuel Company [public notice webpage](#) after the close of the public comment period.

Thanks again,  
Eric

[Eric Balbin Crandall](#)  
Oregon Metro | [OregonMetro.Gov](#)  
Program Assistant for SWICC and cPMO Offices  
503-797-1662  
Eric's in the office: M-F 8-4:30

---

**From:**  
**Sent:** Thursday, November 29, 2018 10:33 AM  
**To:** Metro Solid Waste Compliance  
**Subject:** Grimms Fuel

Sending you an email to advise you of my support for Grimms Fuel. We are Sherwood residence and benefit tremendously from their operation which we consider of environmental necessity for our community in recycling debris that would otherwise be taken to a landfill. Please consider this email in support of their Metro license renewal

With regards,

**Wayne Vandekraak**  
Director of Sales & Marketing



Tel (503) 330-1897 | Fax (801) 991-9009  
[www.optconnect.com](#)  
498 North Kays Drive #110 | Kaysville, UT 84037

---

Stay Connected With OptConnect



## Eric Crandall

---

**From:** Metro Solid Waste Compliance  
**Sent:** Friday, November 30, 2018 9:00 AM  
**To:** Brian Anderson; Metro Solid Waste Compliance  
**Subject:** RE: Grimm's Fuel (My Opinion)

Hello,

Thanks for your comment. Metro will respond to comments in the staff report, which will be available online as an update to the Grimm's Fuel Company [public notice webpage](#) after the close of the public comment period.

Thanks again,  
Eric

[Eric Balbin Crandall](#)  
Oregon Metro | [OregonMetro.Gov](#)  
Program Assistant for SWICC and cPMO Offices  
503-797-1662  
Eric's in the office: M-F 8-4:30

---

**From:**  
**Sent:** Thursday, November 29, 2018 11:48 AM  
**To:** Metro Solid Waste Compliance  
**Subject:** Grimm's Fuel (My Opinion)

I use Grimm's Fuel for dumping remnant stone. I also live close by. I know some people have an issue with the smell, which I only smell it sometimes and it is not that bad. I believe it is the responsibly of all residents, in any community, to consider all consequences to their complaints. Grimm's will need to raise prices which will then be passed on to the residents who hire the companies that dump at Grimm's. I can't imagine how much the cost to the residents will go up if Grimm's was no longer there because then these companies will have to travel farther and pay more to dump elsewhere. Because I am not dumping compostable materials, Grimm's is not going to increase any cost on me but I will for sure see it if I hire a landscaper, gardener, or arborist. If I couldn't stand the smell I would just move instead of negatively effecting the lives of thousands of people.

**Brian Anderson**  
Install Manager  
Crowley's Granite Concepts



## Eric Crandall

---

**From:** Metro Solid Waste Compliance  
**Sent:** Friday, November 30, 2018 9:00 AM  
**To:** Pierce Louis; Metro Solid Waste Compliance  
**Subject:** RE: Grimm's Fuel Company Public Comment

Hello,

Thanks for your comment. Metro will respond to comments in the staff report, which will be available online as an update to the Grimm's Fuel Company [public notice webpage](#) after the close of the public comment period.

Thanks again,  
Eric

[Eric Balbin Crandall](#)  
Oregon Metro | [OregonMetro.Gov](#)  
Program Assistant for SWICC and cPMO Offices  
503-797-1662  
Eric's in the office: M-F 8-4:30

---

**From:**  
**Sent:** Thursday, November 29, 2018 11:52 AM  
**To:** Metro Solid Waste Compliance  
**Subject:** Grimm's Fuel Company Public Comment

Dear Metro,

We are writing in response to the public comment opportunity for Grimm's Fuel proposed amendment to share our experience having permitted and built two compost facilities that serve the Metro region, one in The Dalles, OR and one in Dallesport, WA.

When we moved to Dallesport, Washington we built a purposed-built new facility from bare land. It required three grants, a Kickstarter campaign and a ton of sweat equity. We continued to operate and phase out our The Dalles location for eight months while accepting incoming material at the new facility. From breaking ground in Dallesport to commissioning and using our aeration pad took us 14 months and \$867,000 in order to support a 35,000 ton per year facility. This all occurred on bare land without material on top of it. If we had needed to remove material to build the air pad it would have taken us much longer. All of this is to say that building composting infrastructure is challenging and takes ample time and money. We appreciate the need for hard time limits on Grimm's but ask there be some allowances to phase in the construction as we did when building a new facility. If it were our facility we would be challenged to build a new aerated floor, while operating in a 12 month period and we are half the size of Grimm's facility.

As you well know Grimm's is an important part of the local recycling infrastructure and we would like to see that continue. If Grimm's were not able to continue the local infrastructure would likely be overwhelmed. For example our site is running near it's total current capacity and would not be able to accept additional material.

We applaud the effort that Metro has gone to in order to support organics recycling for the region. We understand and empathize with the situation that you are in and with Metro, Grimm's and the neighbors. We ask that you continue this effort and help Grimm's transition to an aerated system so that they may invest the required time and money to be successful in the long run.

With regards,

Pierce Louis  
**Dirt Hugger**

[www.dirthugger.com](http://www.dirthugger.com)

## Eric Crandall

---

**From:** Metro Solid Waste Compliance  
**Sent:** Friday, November 30, 2018 9:01 AM  
**To:** Rob Gamache; Metro Solid Waste Compliance  
**Subject:** RE: Grimm's Fuel

Hello,

Thanks for your comment. Metro will respond to comments in the staff report, which will be available online as an update to the Grimm's Fuel Company [public notice webpage](#) after the close of the public comment period.

Thanks again,  
Eric

[Eric Balbin Crandall](#)  
Oregon Metro | [OregonMetro.Gov](#)  
Program Assistant for SWICC and cPMO Offices  
503-797-1662  
Eric's in the office: M-F 8-4:30

---

**From:**  
**Sent:** Thursday, November 29, 2018 1:03 PM  
**To:** Metro Solid Waste Compliance  
**Subject:** Grimm's Fuel

Attn: Hila Ritter,

The Tualatin and Sherwood Community has been my home for over 38 years. I am Very acquainted with Grimm Fuel Company and the great service they provide to the community. Grimm's is conveniently located for all Tualatin, Sherwood and Tigard residents. They have had the same location and served the community for decades. In addition to providing a recycling center and landscaping/garden center for our homes, Grimm's also provides employment for a number of people in the community. I personally use Grimm's regularly for both recycling and landscaping services. At no time during any of my visits did I notice anything offensive, they are always professional. They are very courteous with customers as well as their employees. Grimm's provides such a great and much needed service to our community. My family and I rely on them to be active and they will always have our full support.

Sincerely,  
Rob Gamache

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## Eric Crandall

---

**From:** Metro Solid Waste Compliance  
**Sent:** Friday, November 30, 2018 9:01 AM  
**To:** Sandra Reid; Metro Solid Waste Compliance  
**Subject:** RE: Grimm's Fuel

Hello,

Thanks for your comment. Metro will respond to comments in the staff report, which will be available online as an update to the Grimm's Fuel Company [public notice webpage](#) after the close of the public comment period.

Thanks again,  
Eric

[Eric Balbin Crandall](#)  
Oregon Metro | [OregonMetro.Gov](#)  
Program Assistant for SWICC and cPMO Offices  
503-797-1662  
Eric's in the office: M-F 8-4:30

**From:**  
**Sent:** Thursday, November 29, 2018 1:47 PM  
**To:** Metro Solid Waste Compliance  
**Subject:** Grimm's Fuel

Grimm's Fuel provides valuable composting services and quality products to our area's residents. We hope that they will be able to continue doing business in their current location, doing outdoor composting. If limiting the size of the composting piles will do the trick to reduce occasional odor problems, that's great.

Sandra Reid  
Sherwood, OR



## Eric Crandall

---

**From:** Metro Solid Waste Compliance  
**Sent:** Friday, November 30, 2018 9:02 AM  
**To:** Jim; Metro Solid Waste Compliance  
**Subject:** RE: Grimms

Hello,

Thanks for your comment. Metro will respond to comments in the staff report, which will be available online as an update to the Grimm's Fuel Company [public notice webpage](#) after the close of the public comment period.

Thanks again,  
Eric

Eric Balbin Crandall  
Oregon Metro | OregonMetro.Gov  
Program Assistant for SWICC and cPMO Offices  
503-797-1662  
Eric's in the office: M-F 8-4:30

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

**From:**  
**Sent:** Thursday, November 29, 2018 2:09 PM  
**To:** Metro Solid Waste Compliance  
**Subject:** Grimms

Grimms is a perfectly acceptable neighbor, their service is invaluable to the community and we have lived in Tualatin for 30 and 60 years respectively at 9850 Sw Avery St.

Tualatin was a rural community and as people move here they cannot expect it to be, or try to make it, an antiseptic suburb. NIMBY is not a viable argument.

Ridiculous claims and pseudo science being bandied about. So can I assume that next they will be after BBQ's in backyards? This is not a an exaggerated prediction for the sake of drama, we no longer have plastic straws in many locations because of outlandish claims and bureaucracies that sway to them.

Grimms has been here for years. If one did not realize that when you moved here that is your fault not Grimms' problem.

Jim and Karen Muir

Sent from Jim Muir's iPhone (so it must be important!)

## Eric Crandall

---

**From:** Metro Solid Waste Compliance  
**Sent:** Friday, November 30, 2018 9:02 AM  
**To:** Nancy dave Kartak; Metro Solid Waste Compliance  
**Subject:** RE: Grimm's Fuel License Renewal

Hello,

Thanks for your comment. Metro will respond to comments in the staff report, which will be available online as an update to the Grimm's Fuel Company [public notice webpage](#) after the close of the public comment period.

Thanks again,  
Eric

[Eric Balbin Crandall](#)  
Oregon Metro | [OregonMetro.Gov](#)  
Program Assistant for SWICC and cPMO Offices  
503-797-1662  
Eric's in the office: M-F 8-4:30

---

**From:** Nancy dave Kartak  
**Sent:** Thursday, November 29, 2018 3:22 PM  
**To:** Metro Solid Waste Compliance  
**Subject:** Grimm's Fuel License Renewal

## **RENEW THE GRIMM'S FUEL LICENSE!!!!!!!**

This recycling composting business is Vital to the Community and to the Planet.

The alternative suggested by one of the complainers is still Experimental and Prohibitively Expensive.

Government and Business should work together. This long-established business has always improved operations.

Now it is Your Turn to Support them.

## **Renew their license !!!**

## Eric Crandall

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**From:** Metro Solid Waste Compliance  
**Sent:** Friday, November 30, 2018 9:03 AM  
**To:** CYNTHIA HEDRICK; Metro Solid Waste Compliance; Hila Ritter  
**Subject:** RE: proposed license for Grimm's Fuel Company input

Hello,

Thanks for your comment. Metro will respond to comments in the staff report, which will be available online as an update to the Grimm's Fuel Company [public notice webpage](#) after the close of the public comment period.

Thanks again,  
Eric

[Eric Balbin Crandall](#)  
Oregon Metro | [OregonMetro.Gov](#)  
Program Assistant for SWICC and cPMO Offices  
503-797-1662  
Eric's in the office: M-F 8-4:30

---

**From:** CYNTHIA HEDRICK  
**Sent:** Thursday, November 29, 2018 4:15 PM  
**To:** Metro Solid Waste Compliance; Hila Ritter  
**Subject:** proposed license for Grimm's Fuel Company input

Hello Hila; Attached you will find my input for Grimm's new permit.

Cynthia Hedrick

Subject: Grimm's Fuel Company New Permit Public Input

Date: Nov. 29, 2018

Input by: C. Hedrick 3 pages

I have listed my main points of concern for permitting Grimm's Fuel Company as a comment in paragraph form or by line item below. Several points I could have made are covered by CASE and Oregon Air's inputs. I will state that I have the same concerns/issues as they do in their written statements.

**Health:** Grimm's facility needs to be tested for air, water and ground contamination to determine if Grimm's odor is a health hazard. I propose Metro use tax payer's money to hire consultants or a qualified employee to start an air, water and ground contamination monitoring program. Metro used tax payer's money to hire consultants to educate Grimm's a private company. The health of the people paying for those consultants should be at the top of Metro's concerns regardless of DEQ's excuses.

**Real Data:** The words "minimize" and "control" are used throughout this document. These are vague terms that cannot be quantified with real numbers.

**Metro New Aerated System 1.0** The licensee must design, operate, and maintain an aeration system that provides a minimum aeration of ten percent oxygen content to all of the aerobic active composting piles.

**New Aerated System 1.0** Does anyone at Grimm's have the expertise to design operate and maintain an aeration system? Will Metro accept any DIY aeration system from Grimm's or will the system be installed by professionals with the proper qualifications and permits.

**Metro New Oxygen monitoring 1.0** The licensee must describe in the operating plan how it will maintain optimal oxygen levels above five percent in the aerobic active composting piles.

**New Oxygen monitoring 1.0** Ten percent is the minimum oxygen level allowed before the pile becomes anaerobic. Green Mountain Technology, several university's and global warming sites all state ten percent is the minimum oxygen level allowed. None of the papers written or web sites state an outlier such as one five percent reading is acceptable.

**Metro New community engagement plan 2.0** The community engagement plan must describe, at a minimum. How the facility will perform outreach to residents and business located in proximity to the facility (such as good neighbor agreement, informational tours, open house gathering, flyers, etc.)

**New community engagement plan 2.0** Define "proximity", how many miles away from Grimm's do you consider to be in proximity? I live five miles away and I've spoken to people in South Beaverton (about 13 miles from Grimm's) and Wilsonville (about 9 miles from Grimm's) who have all experienced Grimm's odor on a regular basis.

**Metro New community engagement plan 3.0** By December 31, 2019 the licensee must either establish a mutually agreed upon plan with local community group(s) or demonstrate to Metro that it made a good faith effort to engage with the local community.

**New community engagement plan 3.0** Define "local community" as stated at **New community engagement plan 2.0** Grimm's odor has reached at least 13 miles from the facility and those are the people who complain. There are people who have stated in the meetings they have not filed a formal complaint but live several miles from Grimm's.

**Violations:** Monetary fines should be applied at the time of every violation. Metro and DEQ both stated at the Oct 30, 2018 meeting they will not fine Grimm's for violations but will "work with Grimm's when a violation occurs". The Fire Dept is the only organization to date that has forced Grimm's to change their mode of operation. Metro and DEQ have had years to bring in a state-of-the-art composting company that would serve the area's needs. Instead you both pander to Grimm's a company that has fought every change that would benefit the environment and the people within it.

**Documentation problems:** Metro made several changes that are NOT noted in red. You also changed the numbering order but left the old numbers in place.

**5.6.4 Storage and exterior stockpiles;** You removed (6 months) without noting it in red

**5.8 Odor 2;** The entire sentence has been changed and NOT noted in red.

**6.2 Plan compliance;** You made changes to this section that you have NOT noted in red.

**6.3 Plan maintenance;** You made changes to this section that you have NOT noted in red.

**6.4 Access to operating plan;** You made changes to this section that you have NOT noted in red.

**6.6 Procedures for processing and storage of loads;** You made changes to this section that you have NOT noted in red.

## Eric Crandall

---

**From:** Metro Solid Waste Compliance  
**Sent:** Friday, November 30, 2018 9:04 AM  
**To:** Krista Britton; Metro Solid Waste Compliance  
**Subject:** RE: keep Grimm's Fuel

Hello,

Thanks for your comment. Metro will respond to comments in the staff report, which will be available online as an update to the Grimm's Fuel Company [public notice webpage](#) after the close of the public comment period.

Thanks again,  
Eric

[Eric Balbin Crandall](#)  
Oregon Metro | [OregonMetro.Gov](#)  
Program Assistant for SWICC and cPMO Offices  
503-797-1662  
Eric's in the office: M-F 8-4:30

**From:** Krista Britton  
**Sent:** Thursday, November 29, 2018 4:57 PM  
**To:** Metro Solid Waste Compliance  
**Subject:** keep Grimm's Fuel

To whom it may concern:

I grew up in the Tigard/Tualatin area and my family owns a business on Cipole Road--Dpnicoli Inc-- right down the street from Grimm's. We have always been on good terms with this business and have never once been bothered by the smell, we have been down the street from them for close to 34 years.

I personally now live in Sherwood and drive by on my way to work and also have no problems with the company. I urge you to keep them in good standing with the community and remain where they are.

Thank you for your time  
Krista Britton

## Eric Crandall

---

**From:** Metro Solid Waste Compliance  
**Sent:** Friday, November 30, 2018 9:05 AM  
**To:** john bartholomew; Metro Solid Waste Compliance  
**Subject:** RE: Public commnets for Grimm's Fuel

Hello,

Thanks for your comment. Metro will respond to comments in the staff report, which will be available online as an update to the Grimm's Fuel Company [public notice webpage](#) after the close of the public comment period.

Thanks again,  
Eric

[Eric Balbin Crandall](#)  
Oregon Metro | [OregonMetro.Gov](#)  
Program Assistant for SWICC and cPMO Offices  
503-797-1662  
Eric's in the office: M-F 8-4:30

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**From:** john bartholomew  
**Sent:** Thursday, November 29, 2018 8:24 PM  
**To:** Metro Solid Waste Compliance  
**Subject:** Public commnets for Grimm's Fuel

Hi -

We live in Tualatin, near Tualatin High School, over two miles as the crow flies from Grimm's Fuel. I'd estimate that dozens of mornings each year I'll head out to my car to head to work - and there's that smell. It's acrid and organic, from Grimm's.

I encourage you to consider monitoring emissions from their site, considering limiting their operations as needed to improve local conditions, and allowing members of the public to participate in meetings between Metro and Grimm's.

Thanks,

John Bartholomew

22065 SW Taylors Drive



Tualatin OR

## Eric Crandall

---

**From:** Metro Solid Waste Compliance  
**Sent:** Friday, November 30, 2018 9:05 AM  
**To:** Peter Russell; Metro Solid Waste Compliance  
**Subject:** RE: Metro request for comment regarding Grimm's Fuel Co

Hello,

Thanks for your comment. Metro will respond to comments in the staff report, which will be available online as an update to the Grimm's Fuel Company [public notice webpage](#) after the close of the public comment period.

Thanks again,  
Eric

[Eric Balbin Crandall](#)  
Oregon Metro | [OregonMetro.Gov](#)  
Program Assistant for SWICC and cPMO Offices  
503-797-1662  
Eric's in the office: M-F 8-4:30

**From:** Peter Russell  
**Sent:** Thursday, November 29, 2018 9:02 PM  
**To:** Metro Solid Waste Compliance  
**Subject:** Metro request for comment regarding Grimm's Fuel Co

To whom it may concern,

Thank you for this opportunity to comment regarding the recent move by a few "nosey neighbors" to drive a long-time and conscientious Tualatin business out of the business that they do so well. Please ignore these shallow-minded nay-sayers! They are ill-informed and a perfect example of the wrong thinking that ruined California! Please don't let them infect and begin to ruin our beloved Oregon!

First off, let me say that over the past 29 years my wife and I have lived in three different homes situated in three different neighborhoods, all within 1-3 miles of the kind folks at Grimm's Fuel Company. We have used their products and services and we have found them to be great neighbors and absolutely excellent environmental stewards!

Having moved to the Tigard/Tualatin/Sherwood area from the East coast, it wasn't long before our new Oregon neighbors helped us to learn about many of the things that make Oregon such a great place to live. Among these are "the bottle bill", curbside recycling, and to this current issue; the great folks at Grimm's Fuel Company who cheerfully take yard debris and turn it into useful and environmentally friendly landscaping products! This is exactly the kind of business that we are happy to do business with, and we are proud to call them our "neighbor"!

If it's "the smell" that these "nosey neighbor's" complain about, we must remember that THIS is the aroma of creative and good environmental stewardship! If we fall into the emotional trap of removing anything that "creates a funny smell" and someone complains about it, let's consider how this might have changed the course of modern Oregon history.

There are a few other useful production processes that go on here in Oregon that "create funny smells" and these folks also do business and provide services here in the Tigard, Tualatin, and Sherwood areaa. We are all (very likely at least) familiar with the thriving craft beverage industry that has helped to make Oregon so famous and prosperous. Whether it's craft beer, wine, or spirits, the fermentation that allows this process to occur also creates "funny smells", so I have to ask; what would Oregon's reputation (or economy) be like without these businesses?

If this same small group of complainers were to buy a house directly across the street from your favorite winery or brewery (knowing full well that the winery was there first), would it be Metro's response to simply close the winery or the brewery? Of Course Not (I would sincerely hope not, anyway!).

Consider also, that any person who buys a house next to a gas station, might at times smell gasoline, or if they buy a house that is right next to a farm field, they might just smell the aroma's associated with farming.... if they don't like these smells they should have exercised their free will and made the decision NOT to buy that house.

If these "nosey neighbors" don't like the smells that are created at Grimm's Fuels, I respectfully ask that Metro simply suggest to them that they sell their houses near Grimm's and move somewhere else.

Thank you,

Erin & Peter Russell, Happy neighbors of Grimm's Fuel Company  
18450 SW Kummrow Avenue  
Sherwood, Oregon 97140

## Eric Crandall

---

**From:** Metro Solid Waste Compliance  
**Sent:** Friday, November 30, 2018 9:06 AM  
**To:** Ata Saedi; Metro Solid Waste Compliance  
**Subject:** RE: Comments to Proposed Amended Grimm's License

Hello,

Thanks for your comment. Metro will respond to comments in the staff report, which will be available online as an update to the Grimm's Fuel Company [public notice webpage](#) after the close of the public comment period.

Thanks again,  
Eric

[Eric Balbin Crandall](#)  
Oregon Metro | [OregonMetro.Gov](#)  
Program Assistant for SWICC and cPMO Offices  
503-797-1662  
Eric's in the office: M-F 8-4:30

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**From:** Ata Saedi  
**Sent:** Thursday, November 29, 2018 9:41 PM  
**To:** Metro Solid Waste Compliance  
**Subject:** Comments to Proposed Amended Grimm's License

Attached please find my comments to proposed amended Grimm's License and a petition text used earlier last Sept.

Regards,  
Ted Saedi

Thank you Metro for listening to our community's concern and for working towards a viable solution in guiding Grimm's to a modern compost facility. Thank you for hiring GMT to evaluate Grimm's operation.

As part of feed back to the previous community outreach in Sept 2017 by Metro, CASE (Clean Air Safe Environment) organization submitted **232** petitions signed by nearby residents and businesses. In this petition, among others, neighbors requested relief from odor and dust. Same demand is still valid and strongly voiced by Grimm's neighbors. (petition text attached)

We are being told that "some odor" will always be part of composting process. What is "some odor", how it is quantified, at what distance, etc?

Below is a short list of correction to be implemented in new proposed amendments:

1. Odor emission to be confined to Grimm's property boundaries
2. As recommended by GMT, oxygen levels in all parts of composting piles to be no less than 10%
3. "Control and minimize" off-site odor to be reverted back to "prevent" off-side odor.
4. Subjective terms and phrases to be replaced with a meaningful, measurable and enforceable terms.
5. Metro to monitor and measure odor with a Nasal Ranger, as used by GMT.
6. Offensive odor must be clearly specified.
7. Throughput tonnage must be defined and be limited to the capability of the facility's handling.
8. Operational plan to be included in the license text and be offered to public for comments prior to granting the license.

Regards, Ted Saedi  
(CASE board member)

18397 SW 135th Terrace  
Tualatin, OR, 97062









**From:** [Hila Ritter](#)  
**To:**  
**Subject:** RE: Grimms Fuel permit  
**Date:** Friday, November 30, 2018 2:24:00 PM

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Hello,

Thank you for your comment. Metro will respond to comments in the staff report, which will be available online as an update to the Grimm's Fuel Company [public notice webpage](#) after the close of the public comment period.

Thanks again,  
\*Hila

**Hila Ritter**

Solid Waste Authorization Coordinator  
Property and Environmental Services

*My gender pronouns: she, her, hers.*

Metro | [oregonmetro.gov](http://oregonmetro.gov)  
600 NE Grand Ave.  
Portland, OR 97232-2736  
503-797-1862

**From:** Tiffanie Wheeler  
**Sent:** Thursday, November 29, 2018 8:15 AM  
**To:** Hila Ritter  
**Subject:** Grimms Fuel permit

November 29, 2018

Dear Hila,

I am writing this letter in support of Grimm's Fuel composting operation.

I have lived in Tigard directly across the Tualatin River from the Pony Ridge subdivision. I have lived in this area for almost 25 years and have never been concerned about an occasional odor from Grimms. In my opinion, the odors aren't that bad and they never last very long. I have only smelled them 3 times in the last year.

I have attended the public meetings regarding Grimms and I am very concerned about what will happen if they are run out of business. Where does all of that yard debris go if they are forced to close? At the last meeting, someone asked this question and there was no answer other than "the community will absorb it somehow." That is speculation not a solution or an

answer.

As you said, because of the shut down of the plant in Newberg, Grimms has been forced to take in more material over the years and as the only facility in the area that could. You said Grimms currently processes 60% of all the lawn/yard debris both professional and residential in the community. That is an astounding amount of material! Where will all of this go if they are forced to shut down? It seems illegal dumping and price inflation will become a bigger issue in the community than an occasional odor.

It is my understanding there is a vocal group of people led by Mr. Brett Hamilton who is actively trying to shut Grimms down. These people have not lived in this community for 25 years as I have.

I have spoken with Mr. Jeff Grimm regarding the current Metro license proposal and he states the proposed license as written does not allow him enough time to make the changes needed. He said he is certainly willing to spend the money to change his composting methods to appease everyone. However, what would be the point of spending that kind of money if he is not given enough time to implement these changes? It seems he might as well just go out of business now than go in to that kind of debt.

I'm asking you to please consider changing the time frame in your proposal so that Grimms has a chance to stay in business. It seems like that would be a small change to the proposal and would allow Grimms the opportunity to continue to stay in business providing valuable services to our community.

Thank you in advance for your consideration!

Sincerely,  
Tiffanie Wheeler  
17100 S.W. 131st Ave.  
Tigard, OR 97224

## Eric Crandall

---

**From:** Metro Solid Waste Compliance  
**Sent:** Friday, November 30, 2018 9:07 AM  
**To:** Marge Welling; Metro Solid Waste Compliance  
**Subject:** RE: Grimm's License

Hello,

Thanks for your comment. Metro will respond to comments in the staff report, which will be available online as an update to the Grimm's Fuel Company [public notice webpage](#) after the close of the public comment period.

Thanks again,  
Eric

[Eric Balbin Crandall](#)  
Oregon Metro | [OregonMetro.Gov](#)  
Program Assistant for SWICC and cPMO Offices  
503-797-1662  
Eric's in the office: M-F 8-4:30

---

**From:** Marge Welling  
**Sent:** Friday, November 30, 2018 5:59 AM  
**To:** Metro Solid Waste Compliance  
**Subject:** Grimm's License

Dear SWICC,

My husband and I purchased a home in Tualatin last spring. After spending over half a million on the home we were horrified to discover the air quality is quite often compromised by the terrible stench from Grimm's fuel.

We support the position put forth by [OregonAir.org](#) as follows, and wish to see this position implemented as soon as possible.

Sincerely,  
Marge Welling and Chuck Sluyter  
Killarney Lane, Tualatin

“**Oregon Air**

---

### Position Statement:

We appreciate the work that Metro has done to help Grimm's Fuel ("Operator") work towards improving and modernizing their composting operations. We are grateful for the new aerobic composting and monitoring requirements in the proposed Metro License, however, there are number of key areas where the proposed Metro License is not adequate:

**Operating Plan:** We insist that citizen input be required for approval of both the initial Operating Plan and any subsequent changes to the Operating Plan. We request that any operational parameters that can be included directly in the text of the License be so included, rather than being delegated to the Operating Plan, which has not yet been made public.

**No Offsite Odors:** We demand that the Metro License require no offsite odors. We will not tolerate odors in our homes and on our private property. Metro needs to replace the vague language of “minimize offsite odors” with the clear objective language of “prevent offsite odors”. All weasel words must be removed from the License. The License must include only objective, measurable conditions.

**Oxygen:** A minimum 10% oxygen level must be required in all parts of the active compost piles at all times, as described in the GMT report. If oxygen levels drop below 10%, immediate corrective action must be taken by the Operator to bring oxygen levels back up to 10%. If oxygen levels fall below 5%, Operator must notify Metro immediately, cease accepting incoming feedstocks, and focus all efforts on restoring oxygen levels to the 10% minimum level specified in the GMT report. After such event, Metro must verify that oxygen levels have in fact been restored to their 10% minimum level before Operator may resume accepting incoming feedstocks.

**Time Frame:** We appreciate the due dates that Metro has set in the License for pile height reduction. We propose that all other provisions, requirements, and conditions of the Metro License shall go into full effect on or before 12/31/2019. We request that the term of this new Metro License shall be two (2) years expiring on or before 12/31/2020.

**Input Limit:** Incoming feedstock volumes should be limited to 35,000 tons per year, which will restore production volumes back to their 2013 levels. This input limit must remain in place until the new system has been in operation for one year without offsite dust and/or offsite odor impacts.

**Citizen Odor Monitoring:** We request that Metro provide a Nasal Ranger for community use and provide funding for citizen representatives to be trained and certified for using the Nasal Ranger to monitor offsite odors in residential areas.

**Third Party Odor Monitoring:** The Metro License must require that a third-party odor monitoring service (“Monitor”) be hired to measure and record any and all offsite odors. Monitor must document the location and D/T ratio of these offsite odors. Monitor must be trained and certified to use the Nasal Ranger and must not have any conflicts of interest. Monitor must perform random odor sampling (Day, Night, Morning, and Evening) and must also be available for incident response odor sampling whenever citizen complaints identify offsite odors.

**Flow Rate:** License must require that the Operator monitor, track, and record the air flow rate and pressure drop on all air blowers at the facility.

**PFRP:** License must require, in crystal clear language, that all composting operations at the facility must comply with the Process to Further Reduce Pathogens (PFRP) standards as defined by ORS and EPA.

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

November 26, 2018”

Sent from my iPhone

## Eric Crandall

---

**From:** Metro Solid Waste Compliance  
**Sent:** Friday, November 30, 2018 9:07 AM  
**To:** Patty Harvey; Metro Solid Waste Compliance  
**Subject:** RE: Grimms Fuel

Hello,

Thanks for your comment. Metro will respond to comments in the staff report, which will be available online as an update to the Grimm's Fuel Company [public notice webpage](#) after the close of the public comment period.

Thanks again,  
Eric

[Eric Balbin Crandall](#)  
Oregon Metro | [OregonMetro.Gov](#)  
Program Assistant for SWICC and cPMO Offices  
503-797-1662  
Eric's in the office: M-F 8-4:30

---

**From:** Patty Harvey  
**Sent:** Friday, November 30, 2018 6:50 AM  
**To:** Metro Solid Waste Compliance  
**Subject:** Grimms Fuel

To whom it may concern

My family is being exposed to strong smells from what we think is Grimms. At times we cannot even go outside or open the windows.

We would like someone to control their odors and the following since we are aware they are trying to renew their license.

Require citizen input for approval of the Operating Plan. Require no offsite odors. Replace "minimize offsite odors" with "prevent offsite odors". The License must include only objective, measurable conditions. Require 10% minimum oxygen level at all times. Stop accepting new feedstocks if oxygen level falls below 5%. Set the License term at 2 years. Limit input volume to 35,000 tons per year. Provide a Nasal Ranger for community use. Provide funding for Nasal Ranger training and certification. Require third-party odor monitoring and odor incident response. Track and record air flow and pressure drop in all air blowers. Require that all composting operations meet PFRP. Citizen representatives at any meetings between Metro and Grimm's. No last-minute changes to Metro License prior to issuance.

Thank you

Patricia Harvey

[Sent from Yahoo Mail for iPhone](#)

## Eric Crandall

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**From:** Metro Solid Waste Compliance  
**Sent:** Friday, November 30, 2018 9:08 AM  
**To:** Shawna; Metro Solid Waste Compliance  
**Subject:** RE: Grimms

Hello,

Thanks for your comment. Metro will respond to comments in the staff report, which will be available online as an update to the Grimm's Fuel Company [public notice webpage](#) after the close of the public comment period.

Thanks again,  
Eric

[Eric Balbin Crandall](#)  
Oregon Metro | [OregonMetro.Gov](#)  
Program Assistant for SWICC and cPMO Offices  
503-797-1662  
Eric's in the office: M-F 8-4:30

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**From:** Shawna  
**Sent:** Friday, November 30, 2018 8:04 AM  
**To:** Metro Solid Waste Compliance  
**Subject:** Grimms

We appreciate the work that Metro has done to help Grimm's Fuel ("Operator") work towards improving and modernizing their composting operations. We are grateful for the new aerobic composting and monitoring requirements in the proposed Metro License, however, there are number of key areas where the proposed Metro License is not adequate:

**Operating Plan:** We insist that citizen input be required for approval of both the initial Operating Plan and any subsequent changes to the Operating Plan. We request that any operational parameters that can be included directly in the text of the License be so included, rather than being delegated to the Operating Plan, which has not yet been made public.

**No Offsite Odors:** We demand that the Metro License require no offsite odors. We will not tolerate odors in our homes and on our private property. Metro needs to replace the vague language of "minimize offsite odors" with the clear objective language of "prevent offsite odors". All weasel words must be removed from the License. The License must include only objective, measurable conditions.

**Oxygen:** A minimum 10% oxygen level must be required in all parts of the active compost piles at all times, as described in the GMT report. If oxygen levels drop below 10%, immediate corrective action must be taken by the Operator to bring oxygen levels back up to 10%. If oxygen levels fall below 5%, Operator must notify Metro immediately, cease accepting incoming feedstocks, and focus all efforts on restoring oxygen levels to the 10% minimum level specified in the GMT report. After such event, Metro must verify that oxygen levels have in fact been restored to their 10% minimum level before Operator may resume accepting incoming feedstocks.



**Time Frame:** We appreciate the due dates that Metro has set in the License for pile height reduction. We propose that all other provisions, requirements, and conditions of the Metro License shall go into full effect on or before 12/31/2019. We request that the term of this new Metro License shall be two (2) years expiring on or before 12/31/2020.

**Input Limit:** Incoming feedstock volumes should be limited to 35,000 tons per year, which will restore production volumes back to their 2013 levels. This input limit must remain in place until the new system has been in operation for one year without offsite dust and/or offsite odor impacts.

**Citizen Odor Monitoring:** We request that Metro provide a Nasal Ranger for community use and provide funding for citizen representatives to be trained and certified for using the Nasal Ranger to monitor offsite odors in residential areas.

**Third Party Odor Monitoring:** The Metro License must require that a third-party odor monitoring service (“Monitor”) be hired to measure and record any and all offsite odors. Monitor must document the location and D/T ratio of these offsite odors. Monitor must be trained and certified to use the Nasal Ranger and must not have any conflicts of interest. Monitor must perform random odor sampling (Day, Night, Morning, and Evening) and must also be available for incident response odor sampling whenever citizen complaints identify offsite odors.

**Flow Rate:** License must require that the Operator monitor, track, and record the air flow rate and pressure drop on all air blowers at the facility.

**PFRP:** License must require, in crystal clear language, that all composting operations at the facility must comply with the Process to Further Reduce Pathogens (PFRP) standards as defined by ORS and EPA.

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

~Shawna

Shawna C. Thompson  
Licensed Real Estate Broker  
Certified Negotiation Expert  
Selling Homes in Portland Since 2005  
Premiere Property Group, LLC

**From:** [Metro Solid Waste Compliance](#)  
**To:**  
**Subject:** RE: Comments to Metro's Proposed Amendments Grimm's License  
**Date:** Friday, November 30, 2018 2:30:00 PM

---

Hello,

Thank you for your comment. Metro will respond to comments in the staff report, which will be available online as an update to the Grimm's Fuel Company [public notice webpage](#) after the close of the public comment period.

Thanks again,  
\*Hila

**Hila Ritter**

Solid Waste Authorization Coordinator  
Property and Environmental Services

*My gender pronouns: she, her, hers.*

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600 NE Grand Ave.  
Portland, OR 97232-2736  
503-797-1862

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**From:** Mahvash Saedi  
**Sent:** Friday, November 30, 2018 10:37 AM  
**To:** Metro Solid Waste Compliance <[SWICC@oregonmetro.gov](mailto:SWICC@oregonmetro.gov)>  
**Subject:** RE: Comments to Metro's Proposed Amendments Grimm's License

To: Metro Solid Waste Information Compliance and Cleanup

Here is my comments to recent proposed amendment license for Grimm's Fuel Co. Thank you for working towards making our community livable once again.

1. Odor emission to be confined to Grimm's property boundaries
2. As recommended by GMT, oxygen levels in all parts of composting piles to be no less than 10%
3. "Control and minimize" off-site odor to be reverted back to "prevent" off-side odor.
4. Subjective terms and phrases to be replaced with a meaningful, measurable and enforceable terms.
5. Metro to monitor and measure odor with a Nasal Ranger, as used by GMT.
6. Offensive odor must be clearly specified.
7. Throughput tonnage must be defined and be limited to the capability of the facility's handling.

Respectfully,

Mahvash Saedi  
20 years resident of:

18397 SW 135th Ter  
Tualatin, OR 97062



**From:** [Metro Solid Waste Compliance](#)  
**To:**  
**Subject:** RE: Grimm's Fuel Permit Renewal  
**Date:** Friday, November 30, 2018 2:30:00 PM

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Hello,

Thank you for your comment. Metro will respond to comments in the staff report, which will be available online as an update to the Grimm's Fuel Company [public notice webpage](#) after the close of the public comment period.

Thanks again,  
\*Hila

**Hila Ritter**

Solid Waste Authorization Coordinator  
Property and Environmental Services

*My gender pronouns: she, her, hers.*

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**From:** Sheri Esser  
**Sent:** Friday, November 30, 2018 10:38 AM  
**To:** Metro Solid Waste Compliance <[SWICC@oregonmetro.gov](mailto:SWICC@oregonmetro.gov)>  
**Subject:** Grimm's Fuel Permit Renewal

**Metro:**

We appreciate the work that Metro has done to help Grimm's Fuel ("Operator") work towards improving and modernizing their composting operations. We are grateful for the new aerobic composting and monitoring requirements in Metro's proposed license conditions, however, there are number of key areas where the proposed license conditions are not adequate:

**Operating Plan:** We insist that citizen input be required for approval of both the initial Operating Plan and any subsequent changes to the Operating Plan. We request that any operational parameters that can be included directly in the text of the License be so included, rather than being delegated to the Operating Plan, which has not yet been made public.

**No Offsite Odors:** We demand that the Metro License require no offsite odors. We will not tolerate odors in our homes and on our private property. Metro needs to replace the vague language of "minimize offsite odors" with the clear, objective language of "prevent offsite

odors”. All weasel words must be removed from the proposed license conditions. The License must include only objective, measurable conditions.

**Oxygen:** A minimum 10% oxygen level must be required in all parts of the active compost piles at all times, as described in the GMT report. If oxygen levels drop below 10%, immediate corrective action must be taken by the Operator to bring oxygen levels back up to 10%. If oxygen levels fall below 5%, Operator must notify Metro immediately, cease accepting incoming feedstocks, and focus all efforts on restoring oxygen levels to the 10% minimum level specified in the GMT report. After such event, Metro must verify that oxygen levels have in fact been restored to their 10% minimum level before Operator may resume accepting incoming feedstocks.

**Time Frame:** We appreciate the due dates that Metro has set in the license conditions for pile height reduction. We propose that all other provisions, requirements, and conditions shall go into full effect on or before 12/31/2019. We request that the term of this new Metro License shall be two (2) years expiring on or before 12/31/2020.

**Input Limit:** Incoming feedstock volumes should be limited to 35,000 tons per year, which will restore production volumes back to their 2013 levels. This input limit must remain in place until the new system has been in operation for one year without offsite dust and/or offsite odor impacts.

**Citizen Odor Monitoring:** We request that Metro provide a Nasal Ranger for community use, and provide funding for citizen representatives to be trained and certified for using the Nasal Ranger to monitor offsite odors in residential areas.

**Third Party Odor Monitoring:** The Metro License must require that a third-party odor monitoring service (“Monitor”) be hired to measure and record any and all offsite odors. Monitor must document the location and D/T ratio of these offsite odors. Monitor must be trained and certified to use the Nasal Ranger and must not have any conflicts of interest. Monitor must perform random odor sampling (Day, Night, Morning, and Evening) and must also be available for incident response odor sampling whenever citizen complaints identify offsite odors.

**Flow Rate:** License must require that Operator monitor, track, and record the air flow rate and pressure drop on all air blowers at the facility.

**PFRP:** License must require, in crystal clear language, that all composting operations at the facility must comply with the Process to Further Reduce Pathogens (PFRP) standards as defined by ORS and EPA.

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

November 30, 2018

**From:** [Metro Solid Waste Compliance](#)  
**To:**  
**Subject:** RE: Grims - Comments  
**Date:** Friday, November 30, 2018 2:30:00 PM

---

Hello,

Thank you for your comment. Metro will respond to comments in the staff report, which will be available online as an update to the Grimm's Fuel Company [public notice webpage](#) after the close of the public comment period.

Thanks again,  
\*Hila

**Hila Ritter**

Solid Waste Authorization Coordinator  
Property and Environmental Services

*My gender pronouns: she, her, hers.*

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**From:** Anthony Miller  
**Sent:** Friday, November 30, 2018 10:42 AM  
**To:** Metro Solid Waste Compliance <[SWICC@oregonmetro.gov](mailto:SWICC@oregonmetro.gov)>  
**Subject:** Grims - Comments

We appreciate the work that Metro has done to help Grimm's Fuel improve and modernize their composting operations. We are grateful for the new aerobic composting and monitoring requirements in the proposed Metro License, however, there are number of key areas where the proposed Metro License is not adequate:

**Operating Plan:** We insist that citizen input be required for approval of both the initial Operating Plan and any subsequent changes to the Operating Plan. We request that any operational parameters that can be included directly in the text of the License be so included, rather than being delegated to the Operating Plan, which has not yet been made public.

**No Offsite Odors:** We demand that the Metro License require no offsite odors. We will not tolerate odors in our homes and on our private property. Metro needs to replace the vague language of "minimize offsite odors" with the clear objective language of "prevent offsite odors". All weasel words must be removed from the License. The License must include only objective, measurable conditions.

**Oxygen:** A minimum 10% oxygen level must be required in all parts of the active compost piles at all times, as described in the GMT report. If oxygen levels drop below 10%, immediate corrective action must be taken by the Operator to bring oxygen levels back up to 10%. If oxygen levels fall below 5%, Operator

must notify Metro immediately, cease accepting incoming feedstocks, and focus all efforts on restoring oxygen levels to the 10% minimum level specified in the GMT report. After such event, Metro must verify that oxygen levels have in fact been restored to their 10% minimum level before Operator may resume accepting incoming feedstocks.

**Time Frame:** We appreciate the due dates that Metro has set in the License for pile height reduction. We propose that all other provisions, requirements, and conditions of the Metro License shall go into full effect on or before 12/31/2019. We request that the term of this new Metro License shall be two (2) years expiring on or before 12/31/2020.

**Input Limit:** Incoming feedstock volumes should be limited to 35,000 tons per year, which will restore production volumes back to their 2011 levels. This input limit must remain in place until the new system has been in operation for one year without offsite dust and/or offsite odor impacts.

**Citizen Odor Monitoring:** We request that Metro provide a Nasal Ranger for community use and provide funding for citizen representatives to be trained and certified for using the Nasal Ranger to monitor offsite odors in residential areas.

**Third Party Odor Monitoring:** The Metro License must require that a third-party odor monitoring service ("Monitor") be hired to measure and record any and all offsite odors. Monitor must document the Location and D/T Ratio of these offsite odors. Monitor must be trained and certified to use the Nasal Ranger and must not have any conflicts of interest. Monitor must perform random odor sampling (Day, Night, Morning, and Evening) and must also be available for incident response odor sampling whenever citizen complaints identify offsite odors.

**Flow Rate:** License must require that the Operator monitor, track, and record the air flow rate and pressure drop on all air blowers at the facility.

**PFRP:** License must require, in crystal clear language, that all composting operations at the facility must comply with the Process to Further Reduce Pathogens (PFRP) standards as defined by ORS and EPA.

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

--

Best Regards

Anthony Miller

**From:** [Metro Solid Waste Compliance](#)  
**To:**  
**Subject:** RE: Grimm's Fuel License Comments  
**Date:** Friday, November 30, 2018 2:31:00 PM

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Hello,

Thank you for your comment. Metro will respond to comments in the staff report, which will be available online as an update to the Grimm's Fuel Company [public notice webpage](#) after the close of the public comment period.

Thanks again,  
\*Hila

**Hila Ritter**

Solid Waste Authorization Coordinator  
Property and Environmental Services

*My gender pronouns: she, her, hers.*

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---

**From:** Brian Craker  
**Sent:** Friday, November 30, 2018 11:09 AM  
**To:** Metro Solid Waste Compliance <[SWICC@oregonmetro.gov](mailto:SWICC@oregonmetro.gov)>  
**Subject:** Grimm's Fuel License Comments

I wanted to take a moment to submit my input on the Grimm's Fuel License renewal.

My family has lived in the Pony Ridge community across 99W from Grimm's for 15 years, and for the first decade had relatively no issues, outside of 2-3 days/year of occasional mildly annoying odor when we had a perfect south wind. That changed and over the last about 4 years the problem has had a significant negative impact on my family's quality of life, and impact to our property. It has been documented that the pile height over the past few years has grown significantly. When this happened, we immediately began to notice multiple negative effects in our neighborhood. The frequency and potency of the odor increased significantly, to a point where it was noticeable multiple times a week, instead of 2-3 times a year. The strength of the odor also made it so that both my son and I had issues with nausea and headaches when outside or with the windows open if the smell was too strong. It also caused an issue on our property, where the wind would regularly blow debris and dust from Grimm's onto our property, coating windows, the house, any outdoor furniture. We also noticed that our solar panel production has gone down significantly, even with regular washing of the panels, which has had a negative financial impact for us.

Our family respectfully requests that the operating license for Grimm's require them to return to a level of reasonable operation that eliminates the odor and dust effects into our neighborhood, allowing us to enjoy both the indoor and outdoor activities and livability we've expected. I also believe the recommendations being made by Oregon Air will help to accomplish this. While not directly involved with the Oregon Air community group, I have



read their materials, and want to voice my support for all of the recommendations they are making as well. Their recommendations are listed below.

## **Oregon Air Position Statement:**

We appreciate the work that Metro has done to help Grimm's Fuel ("Operator") work towards improving and modernizing their composting operations. We are grateful for the new aerobic composting and monitoring requirements in Metro's proposed license conditions, however, there are number of key areas where the proposed license conditions are not adequate: **Operating Plan:** We insist that citizen input be required for approval of both the initial Operating Plan and any subsequent changes to the Operating Plan. We request that any operational parameters that can be included directly in the text of the License be so included, rather than being delegated to the Operating Plan, which has not yet been made public.

**No Offsite Odors:** We demand that the Metro License require no offsite odors. We will not tolerate odors in our homes and on our private property. Metro needs to replace the vague language of "minimize offsite odors" with the clear, objective language of "prevent offsite odors". All weasel words must be removed from the proposed license conditions. The License must include only objective, measurable conditions.

**Oxygen:** A minimum 10% oxygen level must be required in all parts of the active compost piles at all times, as described in the GMT report. If oxygen levels drop below 10%, immediate corrective action must be taken by the Operator to bring oxygen levels back up to 10%. If oxygen levels fall below 5%, Operator must notify Metro immediately, cease accepting incoming feedstocks, and focus all efforts on restoring oxygen levels to the 10% minimum level specified in the GMT report. After such event, Metro must verify that oxygen levels have in fact been restored to their 10% minimum level before Operator may resume accepting incoming feedstocks.

**Time Frame:** We appreciate the due dates that Metro has set in the license conditions for pile height reduction. We propose that all other provisions, requirements, and conditions shall go into full effect on or before 12/31/2019. We request that the term of this new Metro License shall be two (2) years expiring on or before 12/31/2020.

**Input Limit:** Incoming feedstock volumes should be limited to 35,000 tons per year, which will restore production volumes back to their 2013 levels. This input limit must remain in place until the new system has been in operation for one year without offsite dust and/or offsite odor impacts.

**Citizen Odor Monitoring:** We request that Metro provide a Nasal Ranger for community use, and provide funding for citizen representatives to be trained and certified for using the Nasal Ranger to monitor offsite odors in residential areas.

**Third Party Odor Monitoring:** The Metro License must require that a third-party odor monitoring service (“Monitor”) be hired to measure and record any and all offsite odors. Monitor must document the location and D/T ratio of these offsite odors. Monitor must be trained and certified to use the Nasal Ranger and must not have any conflicts of interest. Monitor must perform random odor sampling (Day, Night, Morning, and Evening) and must also be available for incident response odor sampling whenever citizen complaints identify offsite odors.

**Flow Rate:** License must require that Operator monitor, track, and record the air flow rate and pressure drop on all air blowers at the facility.

**PFRP:** License must require, in crystal clear language, that all composting operations at the facility must comply with the Process to Further Reduce Pathogens (PFRP) standards as defined by ORS and EPA.

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

Thank you for the time and effort you have been putting into this process, along with the hosting of public meetings and publications of needed materials. I would appreciate an acknowledgement of receipt of our feedback, and look forward to the continued work to a reasonable license renewal. Have a wonderful and blessed holiday season!

Brian Craker

◇-----◇

*Brian Craker*

*"Write your plans in pencil, then give God the eraser."  
(Unknown)*

**From:** [Metro Solid Waste Compliance](#)  
**To:**  
**Subject:** RE: Grimm's Fuel Operating License  
**Date:** Friday, November 30, 2018 2:31:00 PM

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Hello,

Thank you for your comment. Metro will respond to comments in the staff report, which will be available online as an update to the Grimm's Fuel Company [public notice webpage](#) after the close of the public comment period.

Thanks again,  
\*Hila

**Hila Ritter**

Solid Waste Authorization Coordinator  
Property and Environmental Services

*My gender pronouns: she, her, hers.*

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**From:** Brian Frainey  
**Sent:** Friday, November 30, 2018 11:15 AM  
**To:** Metro Solid Waste Compliance <[SWICC@oregonmetro.gov](mailto:SWICC@oregonmetro.gov)>  
**Subject:** Grimm's Fuel Operating License

We appreciate the work that Metro has done to help Grimm's Fuel improve and modernize their composting operations. We are grateful for the new aerobic composting and monitoring requirements in the proposed Metro License, however, there are number of key areas where the proposed Metro License is not adequate:

**Operating Plan:** We insist that citizen input be required for approval of both the initial Operating Plan and any subsequent changes to the Operating Plan. We request that any operational parameters that can be included directly in the text of the License be so included, rather than being delegated to the Operating Plan, which has not yet been made public.

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**Input Limit:** Incoming feedstock volumes should be limited to 35,000 tons per year, which will restore production volumes back to their 2011 levels. This input limit must remain in place until the new system has been in operation for one year without offsite dust and/or offsite odor impacts.

**Citizen Odor Monitoring:** We request that Metro provide a Nasal Ranger for community use and provide funding for citizen representatives to be trained and certified for using the Nasal Ranger to monitor offsite odors in residential areas.

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**PFRP:** License must require, in clear language, that all composting operations at the facility must comply with the Process to Further Reduce Pathogens (PFRP) standards as defined by ORS and EPA.

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

Best regards your neighbor

**Brian Frainey**

---

**From:** [Metro Solid Waste Compliance](#)  
**To:**  
**Subject:** RE: Letter for Grimm's Fuel  
**Date:** Friday, November 30, 2018 2:38:00 PM

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Hello,

Thank you for your comment. Metro will respond to comments in the staff report, which will be available online as an update to the Grimm's Fuel Company [public notice webpage](#) after the close of the public comment period.

It is my usual practice to remove names and email addresses before making comments publically available, and I will make concerted effort to honor your request for confidentiality. Thank you for making me aware of this.

Thanks again,  
\*Hila

**Hila Ritter**

Solid Waste Authorization Coordinator  
Property and Environmental Services

*My gender pronouns: she, her, hers.*

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---

**From:**  
**Sent:** Friday, November 30, 2018 12:21 PM  
**To:** Metro Solid Waste Compliance <[SWICC@oregonmetro.gov](mailto:SWICC@oregonmetro.gov)>  
**Subject:** Letter for Grimm's Fuel

Hello,

Attached is my letter, but if you could please leave my name out. I would like to remain anonymous, because I don't want Brett Hamilton to get my email address or contact me.

Thank you.

Sent from [Outlook](#)

Dear Hila,

I am an employee at Grimm's Fuel. I have a family to take care of and I'm very worried about what is going to happen to Grimm's.

From what I have heard and seen I feel like you care more about the disgruntled neighbors who over exaggerate and not the welfare of Grimm's Fuel, it's employees, and customers. I also don't think you realize the magnitude of problems this will have on our residential, landscapers, and garbage haulers if we can't take yard debris anymore. This will impact way more people then you think.

I have also seen Oregon air's list of "demands" and mission statement. I don't think they will ever be happy, even if we were completely odorless. In fact, they are making it their mission to make it impossible for us to do business with their demands. If any of their demands make it into our license I don't think there is a chance of Grimm's surviving. I understand we do smell (sometimes) but not ALL the time, and I don't think that warrants a recycling company to get shut down.

I live by the water treatment plant in Hillsboro, and it stinks sometimes when I go outside, but I understand that those businesses are needed and that we are the ones that moved by them. Would a government entity shut the water treatment plant down because of the smell? I don't think so.

Why can't Grimm's be protected from these vocal neighbors? We are not only a recycling company, but we are a staple to the community as we have been around for 80+ years. In those 80 years we have made so many relationships with our customers, and our community. What about the thousands of people that that support us? I feel like they go in deaf ears.

Please think about the impact this will have if Grimm's can't take yard debris anymore, I hope you take all of our letters of support into consideration for our new license.

**From:** [Metro Solid Waste Compliance](#)  
**To:**  
**Subject:** RE: Proposed license conditions for Grimm's Fuel  
**Date:** Friday, November 30, 2018 2:38:00 PM

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Hello,

Thank you for your comment. Metro will respond to comments in the staff report, which will be available online as an update to the Grimm's Fuel Company [public notice webpage](#) after the close of the public comment period.

Thanks again,  
\*Hila

**Hila Ritter**

Solid Waste Authorization Coordinator  
Property and Environmental Services

*My gender pronouns: she, her, hers.*

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600 NE Grand Ave.  
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**From:** Chris Knutson  
**Sent:** Friday, November 30, 2018 12:50 PM  
**To:** Metro Solid Waste Compliance <[SWICC@oregonmetro.gov](mailto:SWICC@oregonmetro.gov)>  
**Cc:** Chris Knutson

**Subject:** Proposed license conditions for Grimm's Fuel

Hello,

I live less than a mile from Grimm's Fuel and often smell odor from their composting operation. I would like to submit the following request to be in the new licensing requirements.

**GRIMM'S New License Should Include:**

- Odor and dust to be confined to Grimm's property boundaries.
- Oxygen levels in all parts of the composting piles to be no less than 10% as recommended by Green Mountain Technologies.
- Metro to monitor odor by use of a Nasal Ranger device as used by Green Mountain Technologies.

- Metro to respond to all violations with progressive penalties.
- Require that all composting operations meet PFRP.
- Set the License term at 2 years.

Thank you,  
Chris Knutson



**From:** [Metro Solid Waste Compliance](#)  
**To:**  
**Subject:** RE: Odor control  
**Date:** Friday, November 30, 2018 2:38:00 PM

---

Hello,

Thank you for your comment. Metro will respond to comments in the staff report, which will be available online as an update to the Grimm's Fuel Company [public notice webpage](#) after the close of the public comment period.

Thanks again,  
\*Hila

**Hila Ritter**

Solid Waste Authorization Coordinator  
Property and Environmental Services

*My gender pronouns: she, her, hers.*

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503-797-1862

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**From:** cheryl bagby  
**Sent:** Friday, November 30, 2018 1:09 PM  
**To:** Metro Solid Waste Compliance <[SWICC@oregonmetro.gov](mailto:SWICC@oregonmetro.gov)>  
**Subject:** Odor control

We appreciate the work that Metro has done to help Grimm's Fuel ("Operator") work towards improving and modernizing their composting operations. We are grateful for the new aerobic composting and monitoring requirements in Metro's proposed license conditions, however, there are number of key areas where the proposed license conditions are not adequate:

**Operating Plan:** We insist that citizen input be required for approval of both the initial Operating Plan and any subsequent changes to the Operating Plan. We request that any operational parameters that can be included directly in the text of the License be so included, rather than being delegated to the Operating Plan, which has not yet been made public.

**No Offsite Odors:** We demand that the Metro License require no offsite odors. We will not tolerate odors in our homes and on our private property. Metro needs to replace the vague language of "minimize offsite odors" with the clear, objective language of "prevent offsite odors". All weasel words must be removed from the proposed license conditions. The License must include only objective, measurable conditions.

**Oxygen:** A minimum 10% oxygen level must be required in all parts of the active compost piles at all times, as described in the GMT report. If oxygen levels drop below 10%, immediate corrective action must be taken by the Operator to bring oxygen levels back up to 10%. If oxygen levels fall below 5%, Operator must notify Metro immediately, cease accepting incoming feedstocks, and focus all efforts on restoring oxygen levels to the 10% minimum level specified in the GMT report. After such event, Metro must verify that oxygen levels have in fact been restored to their 10% minimum level before Operator may resume accepting incoming feedstocks.

**Time Frame:** We appreciate the due dates that Metro has set in the license conditions for pile height reduction. We propose that all other provisions, requirements, and conditions shall go into full effect on or before 12/31/2019. We request that the term of this new Metro License shall be two (2) years expiring on or before 12/31/2020.

**Input Limit:** Incoming feedstock volumes should be limited to 35,000 tons per year, which will restore production volumes back to their 2013 levels. This input limit must remain in place until the new system has been in operation for one year without offsite dust and/or offsite odor impacts.

**Citizen Odor Monitoring:** We request that Metro provide a Nasal Ranger for community use, and provide funding for citizen representatives to be trained and certified for using the Nasal Ranger to monitor offsite odors in residential areas.

**Third Party Odor Monitoring:** The Metro License must require that a third-party odor monitoring service (“Monitor”) be hired to measure and record any and all offsite odors. Monitor must document the location and D/T ratio of these offsite odors. Monitor must be trained and certified to use the Nasal Ranger and must not have any conflicts of interest. Monitor must perform random odor sampling (Day, Night, Morning, and Evening) and must also be available for incident response odor sampling whenever citizen complaints identify offsite odors.

**Flow Rate:** License must require that Operator monitor, track, and record the air flow rate and pressure drop on all air blowers at the facility.

**PFRP:** License must require, in crystal clear language, that all composting operations at the facility must comply with the Process to Further Reduce Pathogens (PFRP) standards as defined by ORS and EPA.

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

November 30, 2018

**From:** [Metro Solid Waste Compliance](#)  
**To:**  
**Subject:** RE: Letter of Support - Renewal of Grimm's license L-043-18  
**Date:** Friday, November 30, 2018 2:39:00 PM  
**Attachments:** [image001.png](#)

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Hello,

Thank you for your comment. Metro will respond to comments in the staff report, which will be available online as an update to the Grimm's Fuel Company [public notice webpage](#) after the close of the public comment period.

Thanks again,  
\*Hila

**Hila Ritter**

Solid Waste Authorization Coordinator  
Property and Environmental Services

*My gender pronouns: she, her, hers.*

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600 NE Grand Ave.  
Portland, OR 97232-2736  
503-797-1862

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**From:** Eric Anderson  
**Sent:** Friday, November 30, 2018 1:12 PM  
**To:** Metro Solid Waste Compliance <[SWICC@oregonmetro.gov](mailto:SWICC@oregonmetro.gov)>  
**Cc:**  
**Subject:** Letter of Support - Renewal of Grimm's license L-043-18

Good afternoon-

Please find the attached letter of support from Pride Disposal for Grimm's renewal of license L-043-18.

**Eric Anderson**

Controller

13980 SW Tualatin-Sherwood Rd  
PO Box 820  
Sherwood, OR 97140

[www.pridedisposal.com](http://www.pridedisposal.com)





**DISPOSAL COMPANY**

**P.O. Box 820 Sherwood, OR 97140**

**Phone: (503) 625-6177 Fax: (503) 625-6179**

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November 30, 2018

Metro  
600 NE Grand Ave.  
Portland, OR 97232

To Whom It May Concern,

Pride Disposal Company is pleased to submit this letter of support on behalf of Grimm's Fuel Company and their renewal of solid waste license L-043-18.

Grimm's plays a vital role in the collection system as a disposal site for yard debris collected within our jurisdictions. Given the relative few facilities in the region permitted to take yard debris, Grimm's proximity and reasonable rates have helped to keep collection costs down for our residents. Any closure or significant increase in rates at this facility will have a direct negative impact to our residential rate payers as we will be required to have trucks on the road longer, drive greater distances, and pay potentially higher fees for yard debris processing. These factors will lead to increased costs borne by our customers. We are also concerned about the capacity in the region to handle material should Grimm's no longer be allowed to operate.

We thank you for your time and consideration.

Sincerely,

Kristin Lechner  
President

**From:** [Metro Solid Waste Compliance](#)  
**To:**  
**Subject:** RE: Grimms Application Should Not Be Approved  
**Date:** Friday, November 30, 2018 2:40:00 PM

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Hello,

Thank you for your comment. Metro will respond to comments in the staff report, which will be available online as an update to the Grimm's Fuel Company [public notice webpage](#) after the close of the public comment period.

Thanks again,  
\*Hila

**Hila Ritter**

Solid Waste Authorization Coordinator  
Property and Environmental Services

*My gender pronouns: she, her, hers.*

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503-797-1862

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

From: Cathy Holland  
Sent: Friday, November 30, 2018 1:57 PM  
To: Metro Solid Waste Compliance <[SWICC@oregonmetro.gov](mailto:SWICC@oregonmetro.gov)>  
Subject: Grimms Application Should Not Be Approved

The requirements are inadequate and fail to meet the consultants' recommended standards. As written, it allows Grimms to pollute our air. If all this community input means anything, you must deny it. Cathy Holland, Tualatin resident.

Sent from my iPad

## Eric Crandall

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**From:** Metro Solid Waste Compliance  
**Sent:** Friday, November 30, 2018 9:12 AM  
**To:** 'Brett Hamilton'; Metro Solid Waste Compliance  
**Subject:** RE: Grimm's Fuel proposed license conditions

Brett,

I've updated your previous comment with these remark and attachments.

Thanks for you input and have a great weekend, Eric

Eric Balbin Crandall  
Oregon Metro | OregonMetro.Gov  
Program Assistant for SWICC and cPMO Offices  
503-797-1662  
Eric's in the office: M-F 8-4:30

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

From: Brett Hamilton [mailto:brett@simple.be]  
Sent: Friday, November 30, 2018 8:32 AM  
To: Metro Solid Waste Compliance  
Subject: Grimm's Fuel proposed license conditions

Dear Metro,

In consideration of my new understanding about the correct name for the document that we are commenting on, please find attached my revised individual comments (1 page) and the Oregon Air Position Statement (2 pages) regarding the proposed license conditions for Grimm's Fuel. This submission today 11/30 replaces my previous submission made yesterday 11/29.

Please confirm receipt of these new documents. Thank you -Brett

Brett Hamilton  
11430 SW Kalispell Street  
Tualatin OR 97062

29 November 2018

Metro Solid Waste Information Compliance and Cleanup  
600 NE Grand Avenue  
Portland, OR 97232

Re: Grimm's Fuel proposed Metro License

Dear Metro:

Thank you for your help in educating the community about the benefits of aerobic composting. Thank you for hiring Green Mountain Technologies to study the issue with scientific expertise and operational know-how and to provide an expert evaluation of Grimm's operations.

The proposed Metro License is a step in the right direction, but it is lacking in some key areas as outlined in the the attached Oregon Air Position Statement. I concur with the demands outlined by Oregon Air, so I would like to focus my public comments on the most important issue, namely,

#### **THE ODOR.**

I can not emphasize strongly enough how imperative it is that the Metro License define **exactly** what level of odor will be allowable and what level of odor will be a violation. You can not gloss over this issue with vague language. You must address the odor issue directly with courage and specificity. The language in the license must be crystal clear so that all parties involved understand exactly what level of odor is required to comply with the terms of the license. The text of the license must answer all of the following questions:

- What odor level will be allowed?
- What odor level will be a violation?
- How will the odor be measured?
- Who will measure the odor?
- When will the odor be measured?
- How often will the odor be measured?
- Where will the odor be measured?
- What will happen if the odor exceeds the allowable limit?
- What will happen if the odor exceeds 2X the allowable limit?
- What will happen if the odor exceeds 5X the allowable limit?

In order for Metro to enforce the odor provisions of the license, Metro must incorporate an objective measurable odor standard directly into the text of the license. If you do not, the Metro License will have failed to address the most important issue, and there will be consequences for that failure.

Sincerely,

Brett Hamilton



# Oregon Air Position Statement:

We appreciate the work that Metro has done to help Grimm's Fuel ("Operator") work towards improving and modernizing their composting operations. We are grateful for the new aerobic composting and monitoring requirements in the proposed Metro License, however, there are number of key areas where the proposed Metro License is not adequate:

**Operating Plan:** We insist that citizen input be required for approval of both the initial Operating Plan and any subsequent changes to the Operating Plan. We request that any operational parameters that can be included directly in the text of the License be so included, rather than being delegated to the Operating Plan, which has not yet been made public.

**No Offsite Odors:** We demand that the Metro License require no offsite odors. We will not tolerate odors in our homes and on our private property. Metro needs to replace the vague language of "minimize offsite odors" with the clear objective language of "prevent offsite odors". All weasel words must be removed from the License. The License must include only objective, measurable conditions.

**Oxygen:** A minimum 10% oxygen level must be required in all parts of the active compost piles at all times, as described in the GMT report. If oxygen levels drop below 10%, immediate corrective action must be taken by Operator to bring oxygen levels back up to 10%. If oxygen levels fall below 5%, Operator must notify Metro immediately, cease accepting incoming feedstocks, and focus all efforts on restoring oxygen levels to the 10% minimum level specified in the GMT report. After such event, Metro must verify that oxygen levels have in fact been restored to their 10% minimum level before Operator may resume accepting incoming feedstocks.

**Time Frame:** We appreciate the due dates that Metro has set in the License for pile height reduction. We propose that all other provisions, requirements, and conditions of the Metro License shall go into full effect on or before 12/31/2019. We request that the term of this new Metro License shall be two (2) years expiring on or before 12/31/2020.

**Input Limit:** Incoming feedstock volumes should be limited to 35,000 tons per year, which will restore production volumes back to their 2013 levels. This input limit must remain in place until the new system has been in operation for one year without offsite dust and/or offsite odor impacts.

**Citizen Odor Monitoring:** We request that Metro provide a Nasal Ranger for community use and provide funding for citizen representatives to be trained and certified for using the Nasal Ranger to monitor offsite odors in residential areas.

**Third Party Odor Monitoring:** The Metro License must require that a third-party odor monitoring service (“Monitor”) be hired to measure and record any and all offsite odors. Monitor must document the location and D/T ratio of these offsite odors. Monitor must be trained and certified to use the Nasal Ranger and must not have any conflicts of interest. Monitor must perform random odor sampling (Day, Night, Morning, and Evening) and must also be available for incident response odor sampling whenever citizen complaints identify offsite odors.

**Flow Rate:** License must require that the Operator monitor, track, and record the air flow rate and pressure drop on all air blowers at the facility.

**PFRP:** License must require, in crystal clear language, that all composting operations at the facility must comply with the Process to Further Reduce Pathogens (PFRP) standards as defined by ORS and EPA.

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

**From:** [Metro Solid Waste Compliance](#)  
**To:**  
**Subject:** RE: Metro License for Grimms, NO Off-site Odors  
**Date:** Friday, November 30, 2018 2:40:00 PM

---

Hello,

Thank you for your comment. Metro will respond to comments in the staff report, which will be available online as an update to the Grimm's Fuel Company [public notice webpage](#) after the close of the public comment period.

Thanks again,  
\*Hila

**Hila Ritter**

Solid Waste Authorization Coordinator  
Property and Environmental Services

*My gender pronouns: she, her, hers.*

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600 NE Grand Ave.  
Portland, OR 97232-2736  
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**From:**  
**Sent:** Friday, November 30, 2018 2:26 PM  
**To:** Metro Solid Waste Compliance <[SWICC@oregonmetro.gov](mailto:SWICC@oregonmetro.gov)>; ; Duane Altig <[Duane.Altig@oregonmetro.gov](mailto:Duane.Altig@oregonmetro.gov)>  
**Subject:** Metro License for Grimms, NO Off-site Odors

I have reported dozens of incidents of noxious odors from Grimms we have experienced at our beautiful home 2 miles from the composting business. I support the following limits to the Metro license.

Christine Tunstall

Lifelong resident of Tualatin (not including my husband's military duty)

**Position Statement:**

We appreciate the work that Metro has done to help Grimms Fuel ("Operator") work towards improving and modernizing their composting operations. We are grateful for the new aerobic composting and monitoring requirements in Metro's proposed license conditions, however, there are number of key areas where the proposed license conditions are not adequate:

**Operating Plan:** We insist that citizen input be required for approval of both the initial Operating Plan and any subsequent changes to the Operating Plan. We request that any

operational parameters that can be included directly in the text of the License be so included, rather than being delegated to the Operating Plan, which has not yet been made public.

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**Transparency:** We propose that citizen representatives be included in any and all meetings between Metro and Grimms. We request that no last-minute changes be made to the proposed Metro License without informing the citizen representatives as to the substance of such changes prior to issuance.

**From:** [Metro Solid Waste Compliance](#)  
**To:**  
**Subject:** RE: Grimm's license comments  
**Date:** Friday, November 30, 2018 2:42:00 PM

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Hello,

Thank you for your comment. Metro will respond to comments in the staff report, which will be available online as an update to the Grimm's Fuel Company [public notice webpage](#) after the close of the public comment period.

Thanks again,  
\*Hila

**Hila Ritter**

Solid Waste Authorization Coordinator  
Property and Environmental Services

*My gender pronouns: she, her, hers.*

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600 NE Grand Ave.  
Portland, OR 97232-2736  
503-797-1862

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

From: REBECCA maddock  
Sent: Friday, November 30, 2018 2:41 PM  
To: Metro Solid Waste Compliance <[SWICC@oregonmetro.gov](mailto:SWICC@oregonmetro.gov)>  
Subject: Grimm's license comments

Dear Metro officials,

I am writing to let you know how strongly I feel about the odor at Grimms in Tualatin. We have been living here two years, and I am really disappointed and disgusted at the odors we are exposed to in our neighborhood.

This is my home, and it is very embarrassing to have our personal guests smell this repulsive odor in and around our home. This is a highly upsetting issue with me, and my husband, this odor is sickening and putrid.

I am in favor of recycling, but there are ways that Grimms can modernize to have less offensive odor in this area. Other states and other businesses have modernized their operations, and Grimms can too.

There are several issues I would like to mention. The first is that we feel there needs to be more enforcement of the guidelines set for by Metro. Grimms needs to be responsible for their operations being less offensive in smell.

In this age, modernization is part of doing business. Grimms needs to be held accountable for the guidelines recently set up. We all have laws and regulations we must follow, regardless of our desire to do so. We all face tax, and community laws, driving regulations, etc.

There is no reason why Grimms should be exempt from meeting their community regulations.

I think that the Nasal Ranger is a tool that should be available for use, both by citizens our our neighborhood, and by separate agencies as well. I am a retired school teacher, my husband is a retired mechanical engineer. If trained, we could assist in collecting and cataloging data.

We have been following this issue of offensive, repulsive odor and all the agency involvement, through meetings and involvement. This is a complex issue, but laws and regulations are for us all to obey.

It is time for Grimms to meet their community obligations.

This is our neighborhood, we live here, and we live as good citizens of our state and city, and I expect the same from the other residents and businesses in our area.

Please feel free to contact us, by address or phone or email.

Thank you,

Sincerely, Robert and Rebecca Maddock

18333 SW 134th Terrace, Tualatin, Or

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**From:** [Metro Solid Waste Compliance](#)  
**To:**  
**Subject:** RE: Grimm's Fuel Company  
**Date:** Friday, November 30, 2018 2:46:00 PM

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Hello,

Thank you for your comment. Metro will respond to comments in the staff report, which will be available online as an update to the Grimm's Fuel Company [public notice webpage](#) after the close of the public comment period.

Thanks again,  
\*Hila

**Hila Ritter**

Solid Waste Authorization Coordinator  
Property and Environmental Services

*My gender pronouns: she, her, hers.*

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600 NE Grand Ave.  
Portland, OR 97232-2736  
503-797-1862

**From:** Christine Lawrence  
**Sent:** Friday, November 30, 2018 2:45 PM  
**To:** Metro Solid Waste Compliance <[SWICC@oregonmetro.gov](mailto:SWICC@oregonmetro.gov)>  
**Subject:** Grimm's Fuel Company

To Whom it May Concern,

I am writing to express my concerns regarding the proposed license for Grimm's Fuel Company. I have been a resident of the city of Tualatin for almost 10 years and I strongly value the community here. Unfortunately I have been extremely dissatisfied with the recurring odor coming from Grimm's Fuel Company, even though we live 3 miles away. Just yesterday morning I smelled the familiar odor from Grimm's Fuel company as I waited outside with my child and the local neighborhood kids for the morning school bus.

I was encouraged to read in Metro's Proposed License Amendment that Grimm's will be required to make some changes to reduce the odor. However, I think there are still areas for improvement. My concerns regarding Operating Conditions are as follows:

- The odor and airborne particulate levels are not defined. There is no odor or particulate monitoring required. The plan lacks measurable metrics required for proper accountability (what level of debris, what distance from facility, what frequency will it be measured, who is

responsible for confirming measurements, how will it be controlled?). How will this be verified and confirmed? Instead of "minimizing offsite odors" (which again lacks measurable metrics), they should prevent offsite odors and define a numeric value for what this means. Third party odor/air particulate monitoring is recommended. It would be great to have more specific requirements here on how they are to control and minimize odors and air particulate contamination, since this is the main cause of concern for the community.

- Require 10% minimum oxygen level at all times. Stop accepting new loads if the oxygen level falls below 5%. Limit input volume to 35,000 tons per year.

- Many of the details of this plan are not defined explicitly and will need to be further detailed in the Operating Plan that will be controlled by Grimm's. This excludes community review, input, and involvement on these critical details. The Operating Plan should include input from the surrounding communities.

- The license term should be set to 2 years to give an opportunity for the surrounding communities to provide feedback on the improvements thus far, and determine if more odor/air quality mitigations are needed.

Sincerely,

C. Lawrence



**From:** [Metro Solid Waste Compliance](#)  
**To:**  
**Subject:** RE: Grimms Yard Debris License Renewal  
**Date:** Friday, November 30, 2018 3:37:00 PM

---

Hello,

Thank you for your comment. Metro will respond to comments in the staff report, which will be available online as an update to the Grimm's Fuel Company [public notice webpage](#) after the close of the public comment period.

Thanks again,  
\*Hila

**Hila Ritter**

Solid Waste Authorization Coordinator  
Property and Environmental Services

*My gender pronouns: she, her, hers.*

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600 NE Grand Ave.  
Portland, OR 97232-2736  
503-797-1862

**From:** Tim Perri  
**Sent:** Friday, November 30, 2018 3:19 PM  
**To:** Metro Solid Waste Compliance <[SWICC@oregonmetro.gov](mailto:SWICC@oregonmetro.gov)>  
**Subject:** Grimms Yard Debris License Renewal

Metro,

For over 34 years we have been buying **thousands** of yards of garden compost, and mulch products from Grimms Fuel. We have been dropping off our yard debris and picking Grimms' Premium Garden Compost for decades and have always been treated very well and fairly.

I think that a handful of angry, disgruntled, neighbors have stirred up a hornets nest which has made it very difficult and expensive for Grimms to operate as they have for the past 70 years, which is very unfair. It is clear to me that they are making every effort to force Grimms out of the Yard Debris Business completely. The long list of regulations and onerous restrictions combined with the new "Proposed Amendments" are NOT fair, just, or reasonable....see the list below!

This process informed the proposed amendments now available for comment,

which include, among other requirements:

- A limit on the height of compost piles of no more than 14 feet by Dec. 31, 2019
- The operation and maintenance of an aeration system for compost
- Covers for aerobic active composting piles
- Monitoring and recording of oxygen and temperature levels in composting piles
- The establishment of a community engagement plan
- The establishment of a compost operator training plan including continuing education for its qualified operators.

Because Grimms is critical to and handles/processes most of the regions yard waste they should receive special consideration concerning the complaints knowing that they all have originated from the vocal handful of Neighbors.

Asking Grimms to invest MILLIONS of DOLLARS to dramatically change their operation is ridiculously unfair! The timeline to comply is also totally unrealistic....The construction industry is extremely busy and the wait time is frustratingly LONG ... for example--

It takes days to weeks to connect with just one engineer. and longer to find a 2nd engineer for design.

Then you need to seek out and meet with several contractors who have been and who are super busy.

Then you need to meet with the county, city, Metro and the list goes on.

All these things take a great deal of time and money before Grimms can even start breaking ground.

There is so much work in advance of breaking ground...such as rearranging systems and operations adjustments, moving materials ...thousands of yards of materials.

The weather, the rain, the time year all is a challenge while simultaneously running a successful business that operates 7 days a week accommodating the public homeowners, and hundreds of landscapers and contractors and curbside waste haulers. There needs to be some language that allows Grimms to develop a time

A fair, reasonable, and successful plan should allow a realistic time frame for each of the milestones to be completed...this is a multi million dollar expectation/requirement. This huge expectation should be broken down into **achievable phases** so that Grimms can develop a master plan with realistic time frames the they feel they can achieve. i.e...

6 months to gather bids and finish engineering designs.

18 months to move and dig out, excavate and prep for concrete pads

18 months to install and begin operations of the new aeration system

6-12 months to work the kinks out.  
3-4 YEARS is a fair expectation .....not one!

Thanks for the opportunity to be heard.  
Tim Perri

**From:** [Metro Solid Waste Compliance](#)  
**To:**  
**Subject:** RE: Public comment on Grimm's Fuel  
**Date:** Friday, November 30, 2018 3:37:00 PM

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Hello,

Thank you for your comment. Metro will respond to comments in the staff report, which will be available online as an update to the Grimm's Fuel Company [public notice webpage](#) after the close of the public comment period.

Thanks again,  
\*Hila

**Hila Ritter**

Solid Waste Authorization Coordinator  
Property and Environmental Services

*My gender pronouns: she, her, hers.*

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600 NE Grand Ave.  
Portland, OR 97232-2736  
503-797-1862

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

From: Janine W  
Sent: Friday, November 30, 2018 3:30 PM  
To: Metro Solid Waste Compliance <[SWICC@oregonmetro.gov](mailto:SWICC@oregonmetro.gov)>  
Subject: Public comment on Grimm's Fuel

This email serves as public comment for the proposed license for Grimm's Compost operation.

I am hopeful that the lowering of piles and air will resolve the odor and dust I experience several times a week. The contract must state that odor and dust needs to be confined to Grimm's property boundaries.

Metro paid Green Mountain Technologies 50,000 to evaluate and make recommendations. This has been a waste of funding if the contract permits an oxygen level of 5%. Green Mountain's final report states the level should not be less than 10% in any portion on the compost pile. The contract should require oxygen levels above 10%.

Green Mountain also states that the Nasal Ranger confidently measures and quantifies odor. The use of Metro staff, to drive around and sniff is not a scientific method to measure the fowl odor from Grimm's. Metro should purchase the device and the contract should alert Grimm's to Metros

ongoing evaluation for odor control.

The contract should include Metro's progressive discipline for all violations.

Janine Wilson  
Citizen and member of CASE

Sent from my iPad

**From:** [Metro Solid Waste Compliance](#)  
**To:**  
**Subject:** RE: Grimm's  
**Date:** Friday, November 30, 2018 4:06:00 PM

---

Hello,

Thank you for your comment. Metro will respond to comments in the staff report, which will be available online as an update to the Grimm's Fuel Company [public notice webpage](#) after the close of the public comment period.

Thanks again,  
\*Hila

**Hila Ritter**

Solid Waste Authorization Coordinator  
Property and Environmental Services

*My gender pronouns: she, her, hers.*

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600 NE Grand Ave.  
Portland, OR 97232-2736  
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**From:** panmij  
**Sent:** Friday, November 30, 2018 3:57 PM  
**To:** Metro Solid Waste Compliance <[SWICC@oregonmetro.gov](mailto:SWICC@oregonmetro.gov)>  
**Subject:** Grimm's

Hi, My wife & I live in Tualatin & only occasionally smell the odor from Grimm's. We want Grimm's to stay in business & believe they are a valued member of our Community. We would encourage Grimm's to make reasonable changes implemented over a reasonable amount of time & hope that Metro can oversee those changes. I know that many of our neighbors are very vocal in not allowing any offsite odors but we believe that's not reasonable. We also thank you for the hard work Metro does for us. Jim & Lori KNAPP

Sent from my T-Mobile 4G LTE Device

**From:** [Metro Solid Waste Compliance](#)  
**To:**  
**Subject:** RE: Grimms Fuel Company - license L-043-18 renewal  
**Date:** Friday, November 30, 2018 4:36:00 PM

---

Hello,

Thank you for your comment. Metro will respond to comments in the staff report, which will be available online as an update to the Grimm's Fuel Company [public notice webpage](#) after the close of the public comment period.

Thanks again,  
\*Hila

**Hila Ritter**

Solid Waste Authorization Coordinator  
Property and Environmental Services

*My gender pronouns: she, her, hers.*

Metro | [oregonmetro.gov](http://oregonmetro.gov)  
600 NE Grand Ave.  
Portland, OR 97232-2736  
503-797-1862

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**From:** Olivares, John  
**Sent:** Friday, November 30, 2018 4:10 PM  
**To:** Metro Solid Waste Compliance <[SWICC@oregonmetro.gov](mailto:SWICC@oregonmetro.gov)>  
**Subject:** Grimms Fuel Company - license L-043-18 renewal

Republic Services of Clackamas and Washington Counties performs the residential yard debris collection service for the cities of Tualatin and Wilsonville. For years our business has enjoyed the economical and efficiency benefits of the residential "yard debris to compost" operation at Grimm's Fuel Company in Tualatin. The loss of this disposal site would have a substantially negative economic impact on our business. **We are in favor** of solid waste license **L-043-18** renewal.

Thank you.

**John Olivares**

Operations Manager  
Wilsonville / Tualatin  
Lake Oswego / Clackamas & Washington Counties

10295 SW Ridder Rd. Wilsonville OR 97070

w [www.RepublicServices.com](http://www.RepublicServices.com)



We'll handle it from here.™





**From:** [Metro Solid Waste Compliance](#)  
**To:**  
**Subject:** RE: Grimm's Fuel Metro License L-043-18  
**Date:** Friday, November 30, 2018 4:37:00 PM  
**Attachments:** [image001.png](#)

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Hello,

Thank you for your comment. Metro will respond to comments in the staff report, which will be available online as an update to the Grimm's Fuel Company [public notice webpage](#) after the close of the public comment period.

Thanks again,  
\*Hila

**Hila Ritter**

Solid Waste Authorization Coordinator  
Property and Environmental Services

*My gender pronouns: she, her, hers.*

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Portland, OR 97232-2736  
503-797-1862

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**From:** Jeff Grimm  
**Sent:** Friday, November 30, 2018 4:26 PM  
**To:** Metro Solid Waste Compliance <[SWICC@oregonmetro.gov](mailto:SWICC@oregonmetro.gov)>  
**Subject:** Grimm's Fuel Metro License L-043-18

Please find comments from:  
Tim O'Neill  
Engineered Compost Systems  
4220 24th Avenue West  
Seattle, Washington 98199

Jeff Grimm | General Manager

direct 503.636.3623 | fax 503.692.2015 |  
Grimm's Fuel | 18850 SW Cipole Rd | Tualatin, OR 97062  
[www.grimmsfuel.com](http://www.grimmsfuel.com)



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**From:** Tim O'Neill

**Sent:** Tuesday, November 20, 2018 3:07 PM

**To:** Steve Diddy

**Subject:** RE: Metro License

Allowing 12 months to completely re-develop a large active facility with little or no spare ground is, in our opinion, unreasonably aggressive. It is common for a the construction of a new large-scale compost facility to require 8 – 12 months when there are no interference issues with current activities. To plan this development, as opposed relying on guess work and opinions, a comprehensive mass-balance, space planning, and scheduling model should be developed. We are certain that such a model would show that, since only modest portions of the site can be in construction at any one time, more than 12 months will be required.

Tim O'Neill

President

**Engineered Compost Systems**

**From:** [Metro Solid Waste Compliance](#)  
**To:**  
**Subject:** RE: Grimm's Fuel Metro License L-043-18  
**Date:** Friday, November 30, 2018 4:38:00 PM  
**Attachments:** [image001.png](#)

---

Hello,

Thank you for your comment. Metro will respond to comments in the staff report, which will be available online as an update to the Grimm's Fuel Company [public notice webpage](#) after the close of the public comment period.

Thanks again,  
\*Hila

**Hila Ritter**

Solid Waste Authorization Coordinator  
Property and Environmental Services

*My gender pronouns: she, her, hers.*

Metro | [oregonmetro.gov](http://oregonmetro.gov)  
600 NE Grand Ave.  
Portland, OR 97232-2736  
503-797-1862

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**From:** Jeff Grimm  
**Sent:** Friday, November 30, 2018 4:31 PM  
**To:** Metro Solid Waste Compliance <[SWICC@oregonmetro.gov](mailto:SWICC@oregonmetro.gov)>  
**Subject:** Grimm's Fuel Metro License L-043-18

Please find our comments and additions to your revised license conditions attached to this email. We have tried to clarify various technical items and terminology that will be a part of our new license. We have use blue-line to indicate our changes.

Our two biggest issues with the draft are the lack of clear notice of a transitional period for the phasing from a static pile process to ASP and the timeline to accomplish the task.

The December 31, 2019 deadline is especially unrealistic if we are to remain in operation during the transition. If we were to stop receiving material tomorrow, it would take at least 5 months to screen the existing pile and get down to bare ground. Add to that a 9 to 12 month construction phase and you are looking at a completion date of April or May 2020. This ignores the permitting issues and other unforeseen obstacles that we are likely to encounter.

We simply cannot afford to shut down for a year and a half. We are proposing 3 or 4 phases this project. By re-purposing some of our existing area we can conceivably convert 40-60% of our throughput to ASP by August 2019. At that point, a large portion of our existing pile will be gone, and we can begin working

on the final ASP bin phases.

We will diligently work towards that goal and, given cooperation with local governing bodies and Oregon DEQ, believe we can accomplish the transition before December 31, 2020.

Respectfully,

Jeff Grimm | General Manager

direct 503.636.3623 | fax 503.692.2015 |  
Grimm's Fuel | 18850 SW Cipole Rd | Tualatin, OR 97062  
[www.grimmsfuel.com](http://www.grimmsfuel.com)





(Original with Grimm’s edits)

Proposed License Amendments  
Grimm’s Fuel Company  
October 22, 2018

**Definitions:**

~~Aerobic active~~ Aerated static pile (ASP) composting means the managed process of controlled biological decomposition of feedstocks using an aerobic composting process. ~~until pathogen reduction is achieved.~~ A managed process includes, but is not limited to, reducing feedstock particle size, manipulating air through the material utilizing either positive or negative methods, adding moisture, mixing feedstocks, manipulating compost piles, and performing procedures to achieve pathogen reduction.

"Composting" means the managed process of controlled biological decomposition of feedstocks. A managed process includes, but is not limited to, reducing feedstock particle size, adding moisture, mixing feedstocks, manipulating composting piles, and performing procedures to achieve human pathogen reduction.

"Composting" includes both aerobic composting and anaerobic digestion. Other examples of composting include bokashi, fermentation, and vermiculture.

OAR-340-093-0030 (24)

Due dates:

1. Fire Code 40’ pile heights – **January 1, 2019**
2. Updated operating plan – **January 31, 2019**, including:
  - Site plan;
  - Odor minimization plan
3. Community engagement plan – **March 4, 2019**, including such as:
  - Good Neighbor Agreement
  - Open house gathering(s)
  - Flyers
  - Informational tour(s)
4. Oregon Fire Code pile heights – **April 30, 2019**
5. Metro 14’ pile height – ~~December 31, 2019~~ December 31, 2020 depending on local permits and DEQ approvals.

<b>5.0</b>	<b>OPERATING CONDITIONS</b>
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5.1	<b>Assessment of composting operations</b>	<p>The licensee must cooperate in good faith with Metro staff and Metro's consultants related to all aspects of the best practice assessment and recommendations for malodor mitigation project (as described in Metro RFP 3419). As part of that cooperation, licensee must provide access to all areas where it generates, manages, processes, or otherwise stores composting feedstock and retail landscaping products, as well as provide access to all non-financial records (including but not limited to feedstock types, volumes, etc.) that are reasonably necessary to complete the malodor mitigation project.</p>
5.2	<b>Qualified operator</b>	<ol style="list-style-type: none"> <li>1. The licensee must, during all hours of operation, provide an operating staff employed by the facility, and qualified and competent to carry out the functions required by this license and to otherwise ensure compliance with Metro Code Chapter 5.01.</li> <li>2. Facility personnel, as relevant to their job duties and responsibilities, must be familiar with the relevant provisions of this license and the relevant procedures contained within the facility's operating plan.</li> <li>3. A qualified operator must be an employee of the facility with training and authority to reject prohibited waste that is discovered during load checks and to properly manage prohibited waste that is inadvertently received.</li> </ol>
5.3	<b>Fire prevention</b>  <p>We will follow the OFC and agreements with them, see 5.6</p>	<ol style="list-style-type: none"> <li>1. The licensee must provide fire prevention, protection, and control measures, including but not limited to, adequate water supply for fire suppression, and the isolation of potential heat sources and/or flammables from the processing and storage areas.</li> <li>2. <u>The licensee must comply with all applicable Oregon Fire Code requirements including, but not limited to, site access and pile size requirements.</u></li> <li>3. <u>Unless otherwise specified in this license, the licensee must not stockpile materials more than 25 feet in height, 150 feet in width and 250 feet in length after April 30, 2019.</u></li> </ol>

<p><b>5.4</b></p>	<p><b>Adequate vehicle accommodation</b></p>	<p>The licensee must:</p> <ol style="list-style-type: none"> <li>1. Provide <u>on-site</u> access roads of sufficient capacity to adequately accommodate all vehicular traffic. The licensee must maintain access roads to allow the orderly egress and ingress of vehicular traffic when the facility is in operation, including during inclement weather.</li> <li>2. Take reasonable steps to notify and remind persons delivering materials to the facility that vehicles cannot park or queue on public streets or roads except under emergency conditions or as provided by local traffic ordinances.</li> <li>3. Post signs to inform customers not to queue on public roadways.</li> <li>4. Provide adequate on-site parking and queuing for vehicles, including adequate space for on-site tarping and un-tarping of loads.</li> </ol>
<p><b>5.5</b></p>	<p><b>Managing prohibited wastes</b></p>	<ol style="list-style-type: none"> <li>1. The licensee must reject prohibited waste upon discovery and properly manage and dispose of prohibited waste when inadvertently received.</li> <li>2. The licensee must maintain a load-checking program to prevent the acceptance of waste that is prohibited by the license. Load-checking must include at a minimum: <ol style="list-style-type: none"> <li>a) Visual inspection. As each load is tipped, a qualified operator will visibly inspect the load and reject any waste that is prohibited by the license.</li> <li>b) Containment area. A secured and isolated containment area for the storage of prohibited wastes that are inadvertently received. Containment areas must be covered and enclosed to prevent leaking and contamination.</li> </ol> </li> </ol>

		<p>c) Record maintenance. The licensee must maintain records evidencing the training of facility personnel to recognize, properly handle and dispose prohibited waste. The licensee must make these records available for review by Metro.</p> <p>3. Upon discovery, the licensee must remove all prohibited or unauthorized wastes or manage the waste in accordance with DEQ requirements and procedures established in the operating plan. The licensee must remove from the site all prohibited or unauthorized wastes the licensee inadvertently receives and transport the waste to an appropriate destination within 90 days of receipt, unless DEQ or a local government requires that it be removed sooner.</p>
<p><b>5.6</b></p>	<p><b>Storage and exterior stockpiles</b></p>	<p>The licensee must:</p> <ol style="list-style-type: none"> <li>1. Manage, contain, and remove stored materials and solid wastes at sufficient frequency to avoid creating nuisance conditions, vector or bird attraction or harborage, or safety hazards;</li> <li>2. Maintain storage areas in an orderly manner and keep the areas free of litter;</li> <li>3. Position exterior stockpiles within footprints identified on the facility site plan or operating plan; and</li> <li>4. Not stockpile recovered or source-separated materials for longer than 180 days unless such material is composting feedstock that is received and managed in accordance with this license and facility operating plan.</li> <li>5. <a href="#">The licensee must comply with all applicable Oregon Fire Code requirements including, but not limited to, site access and pile size requirements.</a></li> </ol>



<p>5.7</p>	<p><b>Dust, airborne debris and litter</b></p>	<ol style="list-style-type: none"> <li>1. The licensee must operate the facility in a manner that <del>mitigates</del> <u>minimizes controls</u> and <del>mitigates</del> <u>minimizes</u> the generation of dust, airborne debris and litter, and which prevents its migration beyond property boundaries.</li> <li>2. The licensee must: <ol style="list-style-type: none"> <li>a) Take reasonable steps, including signage, to notify and remind persons delivering solid waste to the facility that all loads must be suitably secured to prevent any material from blowing off the load during transit.</li> <li>b) Maintain and operate all vehicles and devices transferring or transporting solid waste from the facility to prevent leaking, spilling or blowing of solid waste on-site or while in transit.</li> <li>c) Maintain and operate all access roads and receiving, processing (including grinding), storage, and reload areas in such a manner as to <del>minimize control</del> <u>minimize control</u> dust and debris generated on-site and <del>prevent minimize</del> <u>prevent minimize</u> such dust and debris from blowing or settling off-site.</li> <li>d) Keep all areas within the site and all vehicle access roads within ¼ mile of the site free of litter and debris generated directly or indirectly as a result of the facility’s operation.</li> <li>e) Maintain on-site facility access roads to <del>prevent or control</del> <u>prevent or control</u> dust and to <del>prevent or control</del> <u>minimize</u> the tracking of mud, gravel or other debris off-site.</li> <li>f) Provide access to the facility for the purpose of uncovered load enforcement. During all times that licensee is accepting solid waste or recyclable materials, licensee must allow authorized representatives of Metro (including law enforcement personnel on contract to Metro) to have access to the facility premises for the purpose of making contact with individuals that Metro representatives have observed transporting uncovered loads of solid waste or recyclable materials on a public road right-of-way in violation of Metro Code Chapter 5.09.</li> </ol> </li> </ol>
<p>5.8</p>	<p><b>Odor</b></p>	<ol style="list-style-type: none"> <li>1. The licensee must operate the facility in a manner that <del>prevents controls and minimizes</del> <u>prevents controls and minimizes</u> off-site <del>mal</del> odors.</li> <li>2. The licensee must establish and follow an odor minimization plan as approved in writing by the Chief Operating Officer.</li> </ol>

5.9	<b>Vectors (e.g. birds, rodents, insects)</b>	<ol style="list-style-type: none"> <li>1. The licensee must operate the facility in a manner that is not conducive to the harborage of rodents, birds, insects, or other vectors capable of transmitting, directly or indirectly, infectious diseases to humans or from one person or animal to another.</li> <li>2. If vectors are present or detected at the facility, the licensee must implement vector control measures.</li> </ol>
5.10	<b>Noise</b>	The licensee must operate the facility in a manner that <b>prevents minimizes</b> noise that causes adverse off-site impacts, and, to the extent necessary, the licensee must meet applicable noise regulatory standards and land-use regulations.
5.11	<b>Water contaminated by solid waste and solid waste leachate</b>	<p>The licensee must operate the facility consistent with an approved DEQ stormwater management plan (or equivalent), and must:</p> <ol style="list-style-type: none"> <li>a) <del>Operate and maintain the facility to prevent contact of solid wastes with</del> <b>Control</b> storm water runoff <del>and precipitation that has contacted compost materials including feedstock;</del></li> <li>b) Dispose of or treat water contaminated by solid waste generated onsite in a manner complying with local, state, and federal laws and regulations.</li> </ol>
5.12	<b>Access control</b>	<ol style="list-style-type: none"> <li>1. The licensee must control access to the facility as necessary to prevent unauthorized entry and dumping.</li> <li>2. The licensee must maintain a gate or other suitable barrier at potential vehicular access points to prevent unauthorized access to the site when an attendant is not on duty.</li> </ol>
5.13	<b>Signage</b>	<p>The licensee must post signs at all public entrances to the facility, and in conformity with local government signage regulations. These signs must be easily and readily visible, and legible from off-site during all hours and must contain at least the following information:</p> <ol style="list-style-type: none"> <li>a) Name of the facility</li> <li>b) Address of the facility;</li> <li>c) Telephone number of facility;</li> <li>d) Emergency telephone number for the facility if different than that listed in subsection (c) above;</li> <li>e) Operating hours during which the facility is open for the receipt of authorized waste;</li> <li>f) Fees and charges;</li> </ol>

		<ul style="list-style-type: none"> <li>g) Metro’s name and telephone number (503) 234-3000;</li> <li>h) A list of authorized and prohibited wastes;</li> <li>i) Vehicle / traffic flow information or diagram;</li> <li>j) Covered load requirements; and</li> <li>k) Directions not to queue on public roadways.</li> </ul>
<b>5.14</b>	<b>Nuisance complaints</b>	<ol style="list-style-type: none"> <li>1. The licensee must respond to all nuisance complaints in a timely manner (including, but not limited to, blowing debris, fugitive dust or malodors, noise, traffic, and vectors), and keep a record of these complaints and any action taken to respond to the complaints, including actions to remedy the conditions that caused the complaint.</li> <li>2. If the facility receives a complaint, the licensee must: <ol style="list-style-type: none"> <li>a) Attempt to respond to that complainant within one business day, or sooner as circumstances may require, and retain documentation of its attempts (whether successful or unsuccessful); and</li> <li>b) Log all such complaints as provided by the operating plan. The licensee must retain each log entry for <del>three</del> <u>one</u> years and it must be available for inspection by Metro.</li> </ol> </li> </ol>
<b>5.15</b>	<b>Access to license document</b>	The licensee must maintain a copy of this license on the facility’s premises, and in a location where facility personnel and Metro representatives have ready access to it.

<b>new</b>	<b>Composting Process and Performance Requirements</b>	
<b>new</b>	<b>Composting Method</b>	<p>The facility must use the <b>aerated static pile (ASP)</b> process of composting utilizing either positive or negative aeration methods, adding moisture, mixing feedstocks, manipulating compost piles and performing procedures to achieve pathogen reduction.</p> <p>If the facility is currently using the static pile process of composting a schedule of the transitional period must be detailed in the operating plan.</p>
<b>new</b>	<b>Pile size</b>	<ol style="list-style-type: none"> <li>1. <b>By December 31, <del>2019</del> 2020, <del>aerobic</del> active ASP composting materials may not exceed 14-feet in height, including any cover material.</b></li> </ol>

		<ol style="list-style-type: none"> <li>By April 30, 2019, all materials onsite, including finished stockpiles, must comply with the Oregon Fire Code. <del>of 25 feet in height, 150 feet in width and 250 feet in length.</del></li> </ol>
<b>new</b>	<b>Cover material</b>	<ol style="list-style-type: none"> <li>The licensee must apply a cover, such as an engineered fabric or 12-inches of porous overs or 4-6 inches of finished composted materials, to all aerobic active ASP composting piles, unless otherwise approved in writing by the COO.</li> <li>The licensee must describe in the operating plan how it will adequately maintain the cover.</li> </ol>
<b>new</b>	<b>Bulk density</b> See Procedure for pile maintenance	The licensee must maintain aerobic active composting piles with adequate bulk density as described in the operating plan and approved in writing by the COO.
<b>new</b>	<b>No disturbance of materials</b>	<ol style="list-style-type: none"> <li>To achieve pathogen odor reduction, the licensee must not disturb materials for a minimum of 15 days upon placement in an aerobic active composting pile.</li> <li>The licensee may only disturb aerobic active composting piles to maintain or achieve optimal conditions as specified in its operating plan.</li> <li>The licensee must keep a log onsite of active composting pile disturbances including date, time, and the reason for the disturbance and make the log available to Metro for inspection upon request.</li> </ol>
<b>new</b>	<b>Aerated system</b>	<ol style="list-style-type: none"> <li>The licensee must design, operate, and maintain an aeration system that provides <del>a minimum</del> an ideal aeration of ten percent oxygen content to all of the aerobic active ASP composting piles.</li> <li>The continuous aeration system, including applicable air cycles, must be described in the operations plan.</li> <li>The licensee must monitor and record oxygen levels at a prescribed frequency as described in the operations plan.</li> </ol>

new	<b>Capture and treatment of air over processing equipment</b>	<ol style="list-style-type: none"> <li>1. The licensee must capture odors at the equipment used for screening and processing of compost to the greatest extent possible.</li> <li>2. The licensee must direct all captured air required under this section to a properly designed and maintained bio-filter.</li> </ol>
new	<b>Oxygen monitoring</b>	<ol style="list-style-type: none"> <li>1. The licensee must describe in the operating plan how it will maintain optimal oxygen levels above five percent in the aerobic active ASP composting piles.</li> <li>2. The licensee must describe in the operating plan what actions it will take if oxygen levels drop below five percent.</li> <li>3. The licensee must describe in the operations plan how and when it will monitor for oxygen levels to ensure optimal levels are being achieved.</li> <li>4. The licensee must maintain a log onsite with these oxygen monitoring records onsite.</li> </ol>

new	<b>Compost monitoring parameters</b> <b>FC: finished compost</b> <b>CP: composting parameters</b>  These parameters should be separated FC/CP	<ol style="list-style-type: none"> <li>1. The licensee must describe in the operating plan the method and frequency in which it will monitor and record composting parameters including:           <ol style="list-style-type: none"> <li>a) Nutrient balance (carbon to nitrogen ratio) FC</li> <li>b) Moisture content CP</li> <li>c) Aeration CP</li> <li>d) Acidity (pH) FC</li> <li>e) Stability FC</li> <li>f) Electrical conductivity FC</li> <li>g) Heavy metals FC</li> <li>h) Temperature CP</li> <li>i) Oxygen CP - same as c) above?</li> <li>j) Fecal coli form and salmonella FC</li> <li>k) Retention time CP</li> </ol> </li> <li>2. The licensee must maintain a record of these composting parameter on site.</li> </ol>
new	<b>Pathogen reduction</b>	<ol style="list-style-type: none"> <li>1. The licensee must describe in the operating plan how it will achieve pathogen reduction on all compost processed at the facility. The plan must include a Process to Further Reduce Pathogens (PFRP) during aerobic active composting.</li> </ol>

		<ol style="list-style-type: none"> <li>2. At a minimum, the active composting piles shall be maintained at a temperature between 131° F and 180° F for a period of 3 days</li> </ol>
<b>new</b>	<b>Temperature monitoring</b>	<ol style="list-style-type: none"> <li>1. The licensee must monitor and record temperatures for each aerobic active ASP composting pile on a daily basis for at least 15 consecutive days.</li> <li>2. The licensee must document the temperature of all composting piles, including curing piles, at least weekly.</li> <li>3. The licensee must describe in the operating plan the measures it will implement when the temperatures are outside of the acceptable range, including but not limited to, the types of equipment used both for temperature readings and performing corrective actions.</li> <li>4. The licensee must maintain a log onsite with these records.</li> </ol>
<b>new</b>	<b>Community engagement plan</b>	<ol style="list-style-type: none"> <li>1. By March 4, 2019, the licensee must establish and submit to Metro a community engagement plan that must be approved in writing by the COO.</li> <li>2. The community engagement plan must describe, at a minimum, how the facility will perform outreach to residents and business located in proximity to the facility (such as good neighbor agreement, informational tours, open house gatherings, flyers, etc.).</li> <li>3. By December 31, 2019, the licensee must either establish a mutually agreed upon plan with local community group(s) or demonstrate to Metro that it made a good faith effort to engage with the local community.</li> </ol>
<b>new</b>	<b>Compost operator training</b>	<ol style="list-style-type: none"> <li>1. The licensee must establish a training program for its qualified operators, including continuing education. The licensee must describe the training program in the operating plan.</li> <li>2. The licensee must maintain a log onsite with training attendance records.</li> <li>3. The licensee must provide copies of training records or certificates to Metro upon request.</li> </ol>

<b>6.0</b>	<b>OPERATING PLAN</b>
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6.2	<b>Plan compliance</b>	The licensee must operate the facility in accordance with an operating plan approved in writing by the COO. The operating plan must include sufficient detail to demonstrate that the facility will comply with this license. The licensee may amend or revise the operating plan from time to time. Revisions to the plan are subject to written approval by the COO.
6.3	<b>Plan maintenance</b>	<ol style="list-style-type: none"> <li>1. The licensee must submit an updated operating plan to the COO by January 31, 2019 as provided in Section 6.0 of this license. The licensee must revise the operating plan as necessary to reflect current facility conditions, procedures, and requirements. The licensee must submit revisions of the operating plan to the COO for written approval before the licensee implements the revisions.</li> <li>2. <b>By January 31, 2019, the licensee must identify the locations of all stockpiles including underlying substrate on a site plan and submit it to Metro.</b></li> </ol>
6.4	<b>Access to operating plan</b>	The licensee must maintain a copy of the operating plan on the facility premises and in a location readily accessible to facility personnel and Metro representatives.
6.5	<b>Procedures for inspecting loads material</b>	<p>The operating plan must include:</p> <ol style="list-style-type: none"> <li>a) Procedures for inspecting incoming loads for the presence of prohibited or unauthorized wastes; and</li> <li>b) A set of objective criteria for accepting and rejecting loads.</li> </ol>
6.6	<b>Procedures for processing and storage of loads material</b>	<p>The operating plan must include procedures for:</p> <ol style="list-style-type: none"> <li>a) Processing authorized materials described in Section 3.0;</li> <li>b) Reloading and transfer of authorized materials described in Section 3.0;</li> <li>c) Managing all material stockpiles within the authorized size requirements as specified in this license;</li> <li>d) Storing authorized materials; and</li> <li>e) Minimizing storage times and avoiding delay in processing of authorized materials.</li> </ol>

<p><b>new</b></p>	<p><b>Procedures for composting operations</b></p> <p>Should be rewritten for just general topics</p>	<p>The operating plan must include procedures for:</p> <ul style="list-style-type: none"> <li>a) Incorporating feedstock into <del>aerobic</del> active composting piles within 24 hours of receipt <del>when possible</del>;</li> <li>b) Covering <del>aerobic active</del> ASP composting piles (e.g. bio-cover);</li> <li>c) Managing the cover appropriately, including but not limited to, ensuring the optimal moisture content range between 40 percent to 60 percent is achieved for a bio-cover;</li> <li>d) Identify criteria and situations necessary for disturbing the <del>aerobic active</del> ASP composting pile, including the types of corrective actions and equipment used;</li> <li>e) Management of malodorous incoming feedstock; and</li> <li>f) Managing feedstocks during all weather conditions and seasonal variability of incoming feedstocks to achieve appropriate nutrient balance (carbon to nitrogen ratio).</li> <li>g) <del>Include a specification of a readily available supply of bulking agents</del></li> </ul>
<p><b>new</b></p>	<p><b>Procedures for pile maintenance</b></p>	<p>The operating plan must include procedures and schedule for:</p> <ul style="list-style-type: none"> <li>a) Maintaining <del>aerobic active</del> ASP composting materials no more than 14-feet in height, including the cover material;</li> <li>b) Applying and maintaining a cover, such as bio-cover comprised of <del>an engineered</del> a mix of porous overs and composted materials applied at a minimum depth of 12-inches and or composted materials applied at a minimum depth of 4-6-inches covering all sides of the piles. The licensee must use a bio-cover unless an alternate cover is pre- a pproved in writing by the COO; <del>and</del></li> <li>c) Maintaining <del>aerobic active</del> ASP composting piles with adequate bulk density. The bulk density should be less than 1,200 lbs/yd<sup>3</sup> and in an ideal range of 800-1000 lbs/yd<sup>3</sup>. The free air space should not drop below 30 percent and</li> <li>d) <del>Maintaining a readily available supply of bulking agents</del></li> </ul>



<p><b>new</b></p>	<p><b>Procedures for oxygen monitoring</b></p>	<p>The operating plan must include procedures for:</p> <ul style="list-style-type: none"> <li>a) Maintaining optimal oxygen levels in the aerobic active aerated composting piles and measures the licensee will take if oxygen levels drop below five percent; and</li> <li>b) Testing oxygen levels, including frequency, to ensure optimal levels, 10 percent and above, are achieved.</li> </ul>
<p><b>new</b></p>	<p><b>Procedures for pathogen reduction</b></p>	<p>The operating plan must include procedures for achieving pathogen reduction on all compost processed at the facility. The plan must include:</p> <ul style="list-style-type: none"> <li>a) A description of the PFRP used at the facility during aerobic active ASP composting;</li> <li>b) At a minimum, the active composting piles shall be maintained at a temperature between 131° and 180° F for a period of 3 days;</li> <li>c) Methods the facility will use for sampling and testing of compost material;</li> <li>d) Procedures the facility will use for handling material that does not meet pathogen reduction standards.</li> </ul>
<p><b>new</b></p>	<p><b>Procedures for temperature monitoring</b></p>	<p>The licensee must describe in the operating plan its procedures for monitoring and tracking temperatures of composting materials. The plan must include:</p> <ul style="list-style-type: none"> <li>a) A description of the equipment the licensee will use to monitor temperatures;</li> <li>b) Procedures for documenting temperatures on a daily basis for each aerobic active ASP composting pile for at least 15 total days;</li> <li>c) Procedures for monitoring and documenting the temperature of all composting piles, including curing piles, at least weekly; and</li> <li>d) Procedures for managing piles in the event the temperatures are outside of the acceptable range including equipment used for corrective actions.</li> </ul>

6.7	<b>Procedures for managing prohibited wastes</b>	<p>The operating plan must include procedures for:</p> <ul style="list-style-type: none"> <li>a) Managing, reloading, and transporting to appropriate facilities or disposal sites each of the prohibited or unauthorized wastes if they are discovered at the facility; and</li> <li>b) Notifying generators not to place hazardous wastes or other prohibited wastes in drop boxes or other collection containers destined for the facility.</li> </ul>
6.8	<b>Procedures for odor minimization plan</b>	<p>The operating plan must include procedures for <b>controlling and minimizing odors</b> generated at the facility from being detected off the premises of the facility. The plan must include:</p> <ul style="list-style-type: none"> <li>a) A management plan that will be used to monitor and manage odors of any derivation including malodorous loads delivered to the facility; and</li> <li>b) Procedures for receiving and recording odor complaints, immediately investigating any odor complaints to determine the cause of odor emissions, and remedying promptly any odor problem at the facility.</li> <li>c) <b>Additional odor-minimizing measures as described in the odor minimization plan and approved in writing by the COO.</b></li> <li>d) <b>Procedures for capturing air during screening and final processing of compost.</b></li> <li>e) <b>Procedures for maintaining the bio-filters at the facility including irrigation, and a media replacement schedule.</b></li> </ul>
6.9	<b>Procedures for dust prevention control</b>	<p>The operating plan must include procedures for preventing dust from blowing off the premises. The plan must include:</p> <ul style="list-style-type: none"> <li>a) A management plan that will be used to monitor and manage dust of any derivation; and</li> <li>b) Procedures for receiving and recording dust complaints, immediately investigating any dust complaints to determine the cause of dust emissions, and remedying promptly any dust problem at the facility.</li> </ul>
6.10	<b>Procedures for emergencies</b>	<p>The operating plan must include procedures to be followed in case of fire or other emergency.</p>

6.11	<b>Procedures for nuisance complaints</b>	<ol style="list-style-type: none"> <li>1. For every nuisance complaint (e.g. odor, dust, vibrations, litter) received, the licensee must record: <ol style="list-style-type: none"> <li>a) The nature of the complaint;</li> <li>b) The date the complaint was received;</li> <li>c) The name, address, email address, and telephone number of the person or persons making the complaint; and</li> <li>d) Any actions taken by the operator in response to the complaint (whether successful or unsuccessful).</li> </ol> </li> <li>2. The licensee must make these records available to Metro inspection upon request. The licensee must retain each complaint record onsite for a period of no less than three years.</li> </ol>
6.12	<b>Closure protocol</b>	<p>As provided in Metro Code Chapter 5.01, the licensee must describe protocol to close and restore the site in the event operations cease. The plan must include procedures for:</p> <ol style="list-style-type: none"> <li>a) Short term closure (duration of time that is more than seven consecutive days but less than 30 consecutive days in length); and</li> <li>b) Long term closure (duration of time that is 30 consecutive days or more in length).</li> </ol>

<b>8.0</b>	<b>RECORD KEEPING AND REPORTING</b>	
8.1	<b>Record keeping requirements</b>	For all materials the licensee is authorized to receive under Section 3.0, including yard debris, the licensee must keep and maintain complete and accurate records of the amount of those materials that the licensee receives, reloads, recovers for delivery for reuse or recycling markets, and disposes.
8.2	<b>Reporting requirements</b>	The licensee must transmit to Metro the records required under Section 8.1 no later than fifteen days following the end of each month in the form and format prescribed by Metro.
8.3	<b>DEQ submittals</b>	If the licensee submits to DEQ any correspondence, exhibits, or documents relating to the terms or conditions of the DEQ solid waste permit or this license, then the licensee must submit copies of that information to Metro within two business days of submitting it to DEQ.

8.4	<b>Copies of enforcement actions provided to Metro</b>	If the licensee receives any notice of violation or non-compliance, citation, or any other similar enforcement action related to the facility's operation from any federal, state or local government (other than Metro), then licensee must send copies of the enforcement action to Metro within two business days of receipt.
8.5	<b>Unusual occurrences</b>	<ol style="list-style-type: none"> <li>1. The licensee must keep and maintain accurate records of any unusual occurrences (such as fires or any other significant disruption) encountered during operation and methods used to resolve problems arising from these events, including details of all incidents that required implementing emergency procedures.</li> <li>2. If a breakdown of the licensee's equipment occurs that will substantially impact the facility's ability to remain in compliance, or create off-site impacts, the licensee must notify Metro within 24 hours of the breakdown.</li> <li>3. The licensee must report any facility fires, accidents, emergencies, and other significant incidents to Metro at (503) 234-3000 within 12 hours of the discovery of their occurrence.</li> </ol>
8.6	<b>Transfer of ownership or control of facility</b>	<ol style="list-style-type: none"> <li>1. The licensee must notify Metro within 10 days if the licensee leases, assigns, mortgages, sells or otherwise transfers the control of the facility to another person, whether whole or in part.</li> </ol>
		<ol style="list-style-type: none"> <li>2. The term for any transferred license is for the remainder of the original term unless the COO establishes a different term.</li> </ol>
new	<b>Records of performance requirements</b>	<ol style="list-style-type: none"> <li>1. The licensee must keep and maintain complete and accurate records of all sampling, testing, monitoring and training on the facility premises and in a location where facility personnel and Metro representatives have ready access to it.</li> <li>2. The licensee must make records of this information available to Metro upon request. The licensee must retain each record for a period of no less than three years.</li> </ol>
new	<b>Records subject to Metro inspection</b>	The licensee must keep and maintain complete and accurate records and required logs subject to Metro inspection upon request.

**From:** [Metro Solid Waste Compliance](#)  
**To:**  
**Subject:** RE: Metro's proposed license conditions for Grimm's Fuel.  
**Date:** Friday, November 30, 2018 4:38:00 PM

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Hello,

Thank you for your comment. Metro will respond to comments in the staff report, which will be available online as an update to the Grimm's Fuel Company [public notice webpage](#) after the close of the public comment period.

Thanks again,  
\*Hila

**Hila Ritter**

Solid Waste Authorization Coordinator  
Property and Environmental Services

*My gender pronouns: she, her, hers.*

Metro | [oregonmetro.gov](http://oregonmetro.gov)  
600 NE Grand Ave.  
Portland, OR 97232-2736  
503-797-1862

**From:** Iancu Family  
**Sent:** Friday, November 30, 2018 4:31 PM  
**To:** Metro Solid Waste Compliance <[SWICC@oregonmetro.gov](mailto:SWICC@oregonmetro.gov)>  
**Subject:** Metro's proposed license conditions for Grimm's Fuel.

I am encouraged by the process in which government agencies are working with Grimm's Fuel to eliminate the offensive odors that have been produced in recent years. I believe that the community relations aspect for Grimm's is extremely important, and needs to be taken quite seriously and professionally in order to cultivate trust with the neighbors (near and far) who are affected by the odor.

I am supportive of the position statement prepared by Oregon Air (<http://www.oregonair.org/position>).

I hope this will be a successful process, with Grimm's continuing to function as a composter for yard debris and with neighborhoods having a pleasant and livable atmosphere.

Martha Iancu  
15715 SW Queen Victoria Pl  
King City, OR 97224

**From:** [Metro Solid Waste Compliance](#)  
**To:**  
**Subject:** RE: Comments on Grimm's Fuel licensing  
**Date:** Friday, November 30, 2018 4:38:00 PM

---

Hello,

Thank you for your comment. Metro will respond to comments in the staff report, which will be available online as an update to the Grimm's Fuel Company [public notice webpage](#) after the close of the public comment period.

Thanks again,  
\*Hila

**Hila Ritter**

Solid Waste Authorization Coordinator  
Property and Environmental Services

*My gender pronouns: she, her, hers.*

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Portland, OR 97232-2736  
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**From:** Andy Wilson  
**Sent:** Friday, November 30, 2018 4:36 PM  
**To:** Metro Solid Waste Compliance <[SWICC@oregonmetro.gov](mailto:SWICC@oregonmetro.gov)>  
**Subject:** Comments on Grimm's Fuel licensing

I am submitting this public comment regarding the proposed license for Grimm's Fuel in Tualatin.

There is a need for composting in the metropolitan area of Portland. As the population increases, there will be a greater need, and greater amounts of green waste. I do not wish to see that need outweigh the human need, for breathable air, clean water, affordable housing and the other services.

In my view, it is Metro that has to solve the equation of providing green waste recycling. It is not the responsibility of an individual, or a business. If a required and necessary service doesn't exist, then the role of Metro should be to facilitate the establishment of the service. Equally, there should be equitable locating of any required and necessary services, so that the burden does not fall unfairly on legacy facilities. Everyone has to contribute, no one community should have to suffer the odor and dust that the residents living within several miles of Grimm's have to endure.

If Metro will not look at the future and reexamine its responsibilities and make a people friendly plan, then waste management will be an increasing source of tension between those who produce it, those who process it, and those who have to live with it. There is no winner here.

The contract for expert advice from Green Mountain Technologies (GMT) was money well spent. The plan clearly provides for processes to measure and improve the livability of the communities surrounding waste management facilities. Metro is well advised to include these recommendations in the license.

I recommend that the license for Grimm's Fuel include the following requirements or conditions:

1. Odor and dust must to be confined to Grimm's property boundaries.
2. The oxygen levels must be managed, and tested, so that the oxygen level does not fall below 10%.
3. Violations of the license must have progressive penalties.
4. Investigation of complaints from the community must be investigated in a timely manner and use scientific criteria for evaluating the existence of a violation. This should include use of the GMT recommended device Nasal Ranger.

I want to recognize and commend the outreach efforts of the Metro team and waste management staff for their professionalism, responses, and approachability. It speaks well of Metro that its employees are professionals serving their community.

Thank you,

Andy Wilson

**From:** [Metro Solid Waste Compliance](#)  
**To:**  
**Subject:** RE: Grimm's fuel public comments  
**Date:** Friday, November 30, 2018 5:09:00 PM

---

Hello,

Thank you for your comment. Metro will respond to comments in the staff report, which will be available online as an update to the Grimm's Fuel Company [public notice webpage](#) after the close of the public comment period.

Thanks again,  
\*Hila

**Hila Ritter**

Solid Waste Authorization Coordinator  
Property and Environmental Services

*My gender pronouns: she, her, hers.*

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**From:** john heaton  
**Sent:** Friday, November 30, 2018 4:59 PM  
**To:** Metro Solid Waste Compliance <[SWICC@oregonmetro.gov](mailto:SWICC@oregonmetro.gov)>  
**Subject:** Grimm's fuel public comments

Hi

I'm a resident of Tigard, have lived by Twality Middle School for 23 years. I've lived in the area for over 40. I've been a customer at Grimm's since the late eighties.

Never have I smelled Grimm's in Tigard. I see on Nextdoor some of my neighbors blaming every phantom smell on Grimm's. These same neighbors live near a sewage treatment plant. Fanno Creek smells like sewage! I lived by it in the eighties! Compost does not smell like sewage.

I've read some of the transcripts of the metro meetings. OMG, these people are crazy!!! That one serial complainer- Brett Hamilton is on a Facebook page called Tualatin moms spreading lies and half truths about a company that is actually is green!

Grimm's is a great local business that really does a community service. Taking in waste and turning into a usable product. I would hate to see them go out of business! Where would the areas green waste go? A landfill? Grabhorn is gone, the mill in Newberg is gone.. The line at



the transfer station in Oregon City is always a block long and at least a half hour wait!  
Compost has an odor no matter how it's produced.. There is no magic pill here.

I'm sure the city of Tualatin would like to see them gone so more brick and glass could be built to increase their tax base! That's just a shame!

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**From:** [Metro Solid Waste Compliance](#)  
**To:** [Metro Solid Waste Compliance](#)  
**Cc:**  
**Subject:** RE: Grimm's Fuel Metro License GMT comments  
**Date:** Friday, November 30, 2018 5:09:00 PM

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Hello,

Thank you for your comment. Metro will respond to comments in the staff report, which will be available online as an update to the Grimm's Fuel Company [public notice webpage](#) after the close of the public comment period.

Thanks again,  
\*Hila

**Hila Ritter**

Solid Waste Authorization Coordinator  
Property and Environmental Services

*My gender pronouns: she, her, hers.*

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**From:** Michael Bryan-Brown

**Sent:** Friday, November 30, 2018 4:59 PM  
**To:** Metro Solid Waste Compliance <[SWICC@oregonmetro.gov](mailto:SWICC@oregonmetro.gov)>  
**Cc:** 'Jeff Gage' <[jeff@compostingtechnology.com](mailto:jeff@compostingtechnology.com)>  
**Subject:** Grimm's Fuel Metro License GMT comments

Dear Metro;

Enclosed are comments for the Grimms license.

## Grimms Fuel Metro License Conditions

*RE: Comments on proposed License amendments for Grimm's Fuel compost facility*

Green Mountain Technologies (GMT) has been closely involved as a contractor to Metro in the review and advice on the odor issues created by Grimm's Fuel and the potential solutions to get their odors under control. We were recently hired by Grimm's Fuel to provide an Aerated Static Pile (ASP) aeration system design and a transition plan and have begun evaluating alternatives. We have reviewed the proposed license amendments and have several concerns about the implementation of the timeline. We hope these comments will help create a basis for workable and effective solutions to significantly reduce odors.

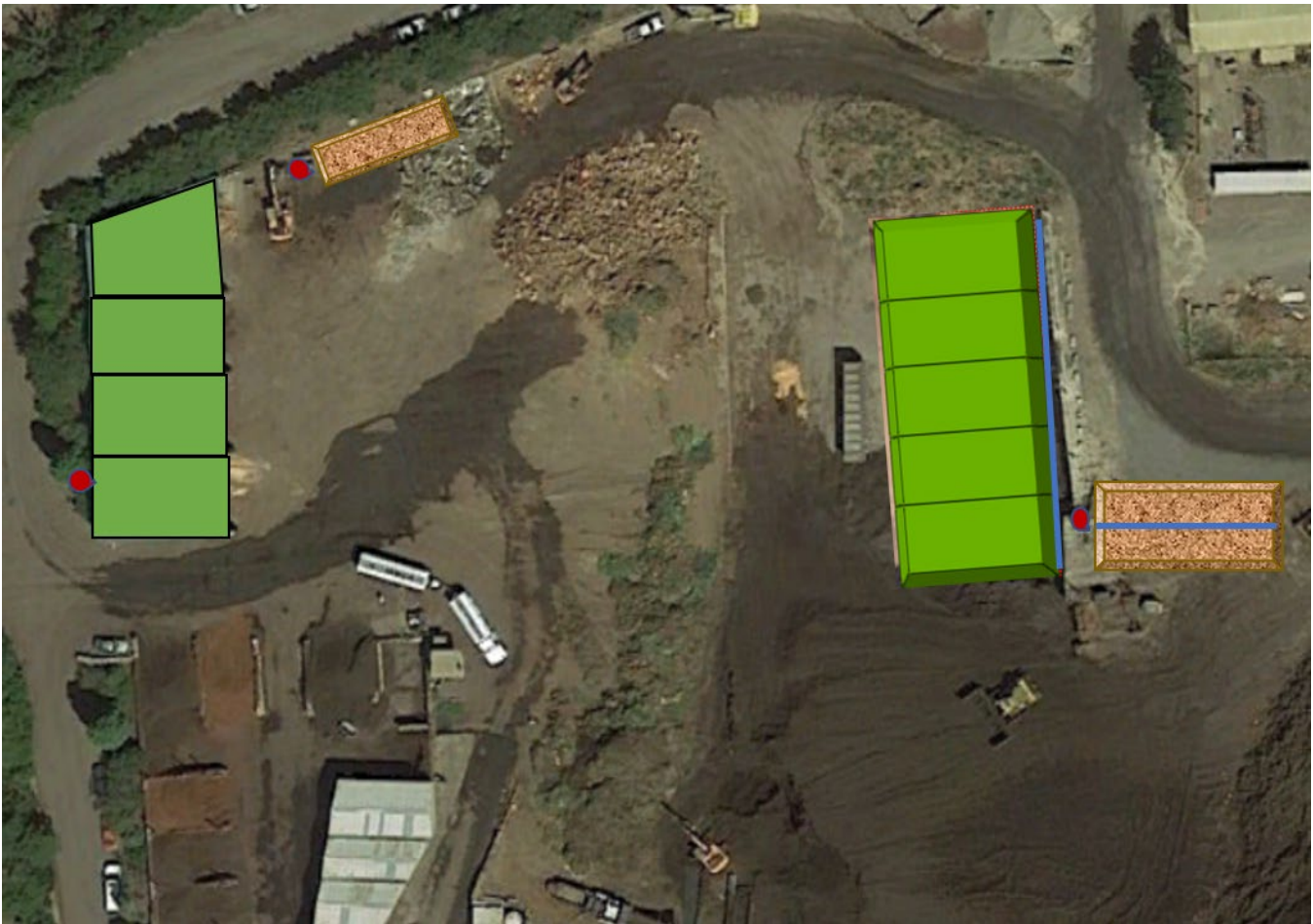
We agree with most of the conditions within the latest draft of the permit. We especially support the use of the forced aeration system and the use of the compost blanket as the primary method to mitigate odors. The proposed use of the aerated static pile(ASP) system will accelerate the degradation of the odor compounds in the fresh yard debris. During active composting in an aerated system, over 80% of the odors are generated and released within the pile in the first 7 to 10 days of composting while the initial degradation takes place.

The challenge will be opening up foot print so the ASP aeration system can be constructed while the facility is still operating. Currently there is an enormous static pile which is in the way of constructing the ASP system. The proposed permit requires a reduction in height of the piles which will prevent Grimm's from opening up foot print for construction because all the screening will be directed to taking compost off the tops of the piles. The Chart below provides the most up to date information and estimates of incoming materials using 2017 winter incoming volumes to estimate the time required to clear out the existing stock pile.

<b>Grimms Fuel Transition Processing Volume Est.</b>				
Existing Stock pile on November 30th 2018	111,000	yards <sup>3</sup>		Estimated
10% Overs recycled back into fresh feedstock	11,100	yards <sup>3</sup>		For bulking
Incoming volume estimate Dec to June, 2019	55,238	yards <sup>3</sup>	75%	After composted
10% Overs recycled back into fresh feedstock	5,524	yards <sup>3</sup>		For bulking
<b>Total material to screen Dec 2018 to June 2019</b>	<b>182,861</b>	yards <sup>3</sup>		
Screener capacity per hour	100	yards <sup>3</sup> /hour		Average
Operating hours per week	64	hours per week		Maximum
Screening capacity per week	6,400	yards <sup>3</sup> /week		Maximum
<b>Screening finish date June 29th</b>	<b>29</b>	<b>weeks</b>		

Grimm's is working double shifts 4 days a week and regular shifts 2 days a week to maximize screenintn to reduce pile size and meet the fire department height requirements and make room for each phase of ASP construction. If all working days work perfectly, the enormous stock pile could be cleared out by the first of July.

We have identified 2 places in the receiving area to construct ASP pads in places not currently impacted by the stock pile as shown below. Grimm's has agreed that they will begin to convert both those areas into functional ASP systems as soon as Metro permits are approved. This can provide 10,000 cubic yards of processing capacity to shorten the composting time to keep the storage requirements minimized. This temporary Wood Bin and Receiving Pit ASP area is enough for a month of receipts in the winter, but inadequate during the spring when over 15,000 cubic yards may be coming in. Barring any permit complications, these pads should be operational by the summer of 2019.



This is then the point when the coordinated construction of the paved aeration pads can be started for the main ASP pads. Barring any permitting delays that would set back the start of this construction, there is a significant amount of construction that will be needed to grade and pave the area, install piping and

drainage, blower and power systems in a sequence that allows the facility to keep processing during construction. The existing deadline of December 31, 2019 creates a strong possibility of being exceeded even with all aspects of construction and operations going as planned. We propose that a graduated timeline be proposed for a certain percentage of the operation be on air by a fixed date with 100% completion in June, 2020.

We would hope that the neighbors and Metro would understand these material handling and construction issues and see that to both bring down the pile size by April and to get enough room for operations and construction, pushes the completion date further than December 2019. The good news is that the temporary aerated systems will be in operation sooner, they just won't be big enough for handling peak capacities until the pads can be constructed where the stock pile is now.

Best Regards,



Michael Bryan-Brown  
President  
Green Mountain Technologies



**From:** [Jeff Grimm](#)  
**To:** [Hila Ritter](#)  
**Subject:** Comments...  
**Date:** Friday, December 14, 2018 11:36:17 AM  
**Attachments:** [grimmsfuel.png](#)

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Dear Ms. Ritter,

Thank you for forwarding the comments from the recent public comment period. We appreciate Metro's efforts to address the concerns of our surrounding neighbors and help us work towards a solution to our recent odor issues. Over the years, we have made many changes to our processing system to lessen our odor impacts. Going forward, we will continue to do everything in our power to lessen those odors.

We are thankful to read the letters in support of our company and hope that our upcoming changes will address the concerns of those who are critical of our operation.

As our once rural corner of Washington County becomes urbanized, the composting methods that have served us so well over the last 40 years are no longer suitable. Over those years we have made many changes to our system in order to lessen our odor impacts and those efforts continue to this day.

We have proactively implemented recommendations from Green Mountain Technologies and have begun the long process of changing our composting method to an aerated system.

We are in the process of re-purposing two of our existing areas to compost yard debris on an aerated surface. When the first phase is completed, 10-15% of our operation will be on an aerated surface.

Planning for the second phase of the project is also in process and when completed, 40-60% of our throughput will be on an aerated surface.

This will free up enough space that we can finally begin working to convert our main processing area to an aerated surface.

I know that this phased approach will take longer than many people would like but it is the only way that we can transition to the new system while continuing to receive yard debris from customers who have come to rely on us. During this transition, I am confident that odors will continue to decrease as the process is updated.

-

While it is impossible to operate a composting facility without producing some odors, we are confident that an aerated system will further lessen our impacts and we look forward to working with the DEQ, Metro and our neighbors.

Sincerely,

Jeff Grimm | General Manager

direct 503.636.3623 | fax 503.692.2015 |  
Grimm's Fuel | 18850 SW Cipole Rd | Tualatin, OR 97062  
[www.grimmsfuel.com](http://www.grimmsfuel.com)

