

From: [Metro Solid Waste Compliance](#)
To: [REDACTED]@frontier.com"
Subject: RE: Form submission from: Comment on the draft license for Grimm's Fuel Company
Date: Friday, February 01, 2019 3:51:00 PM

Hello,

Thank you for your comment. More information about Metro's role and activities related to Grimm's Fuel Company can be found on our [website](#).

Thanks again,

*Hila

Hila Ritter
Solid Waste Authorization Coordinator
Property and Environmental Services
My gender pronouns: she, her, hers.
Metro | oregonmetro.gov
600 NE Grand Ave.
Portland, OR 97232-2736
503-797-1862

From: Website feedback form [mailto:feedback@oregonmetro.gov]
Sent: Friday, February 01, 2019 3:35 PM
To: Metro Solid Waste Compliance <SWICC@oregonmetro.gov>
Subject: Form submission from: Comment on the draft license for Grimm's Fuel Company

Submitted on Friday, February 1, 2019 - 3:35pm

First name: Lori
Last name: Birkeland
Email: [REDACTED]@frontier.com
Zip code: 97062

Do you support Metro issuing this license as written? No

Please explain: the proposed license still does not meet the needs of the community therefore this license should not be issued as written.

Do you have a concern that's not addressed in this license? Yes

Please explain: After much honest public feedback at the last meeting, the action plan proposed still skirts the issues and does not focus on a direct solution. Its like still beating around the bush and not requiring them to make permanent solution head on.

Do you have additional input or specific changes to suggest relating to the draft license? Yes

Please explain: See above. Lets quit skirting their obligation to make changes and lets hold their feet to the fire to get them done. Why is this so hard? Everything in this community is changing - life changes. Grimms doesn't get to keep functioning as they did in 1929 - lets get up to the present if you are going to continue to run a business in this area. I don't know why

this is so difficult. every other business that comes into Tualatin I am sure is required to meet standards of TODAY's business requirements not 80 years ago.....Lets get back to Air Quality, Public Health and quit making excuses on why they can't get this up to date.

From: [Metro Solid Waste Compliance](#)
To: ["Brett Hamilton"](#)
Subject: RE: Public Comments
Date: Tuesday, February 05, 2019 10:40:00 AM

Hello,

Thank you for your comment. More information about Metro's role and activities related to Grimm's Fuel Company can be found on our [website](#).

Thanks again,
*Hila

Hila Ritter
Solid Waste Authorization Coordinator
Property and Environmental Services
My gender pronouns: she, her, hers.
Metro | oregonmetro.gov
600 NE Grand Ave.
Portland, OR 97232-2736
503-797-1862

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

From: Brett Hamilton [mailto:[\[REDACTED\]@simple.be](#)]
Sent: Monday, February 04, 2019 1:52 PM
To: Metro Solid Waste Compliance <[\[REDACTED\]@oregonmetro.gov](#)>
Subject: Public Comments

Dear Metro,

Please find attached my public comments regarding the proposed Metro solid waste facility license for Grimm's Fuel in Tualatin.

Sincerely,
Brett Hamilton

February 4, 2019

Solid Waste Authorization Coordinator
Metro Solid Waste Information Compliance & Cleanup
600 NE Grand Avenue, Portland OR 97232

Re: Proposed License for Grimm's Fuel Company

Dear Metro:

Thank you for extending the renewal period by 60 days to allow for further review of the Metro license for Grimm's Fuel. I appreciate the progress that Metro has made in requiring improvements to the operations at the facility, however, there are a number of areas where the proposed license is not adequate, and therefore I do not support the issuance of this license as written.

Minimum Oxygen Content

Under the license heading **Aeration System** (section 6.6.1 in the proposed license) a change was made between the 10/22/2018 proposed license conditions and the 1/4/2019 proposed license. This change in wording weakened the requirement in a meaningful way. Please note the difference between "operating a system that **provides** a minimum aeration" and "operating a system that **is designed to provide** a minimum aeration". I would ask that Metro please revise this wording to clarify the meaning of this requirement.

(BEFORE) "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."

(AFTER) "The licensee must operate and maintain an aeration system that is designed to provide a minimum aeration of ten percent oxygen content to all of the ASP composting piles."

(SUGGESTED EDIT) The licensee must operate and maintain an aeration system that provides a minimum aeration of ten percent oxygen content to all of the ASP composting piles.

Public Health

I am very concerned about the potential health impacts from airborne dust, pathogens, particulates, bioaerosols, gasses, and other emissions from Grimm's Fuel.

In light of the public testimony that has been provided to Metro regarding numerous health symptoms that may be caused by these air emissions, I do not understand why continuous and quantitative air-quality monitoring is not required as a condition of Grimm's solid waste license. Furthermore, I would ask that Metro provide funding for a comprehensive air quality study and a human health risk assessment. The public has a right to know what is in the air that we are breathing, and we have a right to know if the air we breathe contains compounds that are harmful to human health.

Metro Code

Chapter 5 of the Metro code includes specific requirements for the content of a solid waste license. Section 5.01.090(c) says, "The license must require that the facility operate in a manner that meets the following general performance goals:

1. Environment. It is designed and operated to avoid undue threats to the environment including, but not limited to, stormwater or groundwater contamination, air pollution, and improper acceptance and management of hazardous waste asbestos and other prohibited wastes.
2. Health and Safety. It is designed and operated to avoid conditions that may degrade public health and safety including, but not limited to, fires, vectors, pathogens and airborne debris.
3. Nuisances. It is designed and operated to avoid nuisance conditions including, but not limited to, litter, dust, odors, and noise."

After searching the proposed license, I am unable find the words **groundwater** or **pollution**. The phrase **public health** is absent, and I find no reference to **nuisance odors**. A side-by-side comparison of the proposed license with the Metro code leads me to conclude that the license, as currently written, is not in compliance with the Metro code. I respectfully request that the license be revised to include all of the the general performance goals stipulated in section 5.01.090 of the Metro code.

Thank you for your consideration in this matter.

Sincerely,

Brett Hamilton

From: [Metro Solid Waste Compliance](#)
To: ["Brett Hamilton"](#)
Subject: RE: Public Comments from Oregon Air
Date: Tuesday, February 05, 2019 10:40:00 AM

Hello,

Thank you for your comment. More information about Metro's role and activities related to Grimm's Fuel Company can be found on our website.

Thanks again,
*Hila

Hila Ritter
Solid Waste Authorization Coordinator
Property and Environmental Services
My gender pronouns: she, her, hers.
Metro | oregonmetro.gov
600 NE Grand Ave.
Portland, OR 97232-2736
503-797-1862

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

From: Brett Hamilton [[mailto:\[REDACTED\]@simple.be](mailto:[REDACTED]@simple.be)]
Sent: Monday, February 04, 2019 2:05 PM
To: Metro Solid Waste Compliance <[\[REDACTED\]@oregonmetro.gov](mailto:[REDACTED]@oregonmetro.gov)>
Subject: Public Comments from Oregon Air

Dear Metro,

Please find attached the Oregon Air indoor composting proposal and the response from Oregon Air to the proposed solid waste facility license for Grimm's Fuel in Tualatin. We ask that these documents be included in the current public comments period. Thank you.

Sincerely,
Brett Hamilton

Do you support Metro issuing this license as written? No

Do you have a concern that's not addressed in this license? Yes

The proposed license does not adequately address the following concerns:

- Public Health, Human Health Risks, Public Safety
- Leachate Contamination of Stormwater and Groundwater
- Air Pollution and Air Quality Monitoring
- Particulates, Bioaerosols, Odorous Compounds
- Gasses, Air Emissions, VOC's
- Air Quality and Environmental Damage

At an absolute minimum, the license should include all of the performance goals stipulated in Chapter 5 of the Metro Code section 5.01.090(c) specifically (1) Environment (2) Health and Safety and (3) Nuisances. We are unable to find any reference to “groundwater” or “public health” in the proposed license, and we believe that this license is not in compliance with Metro Code. We ask that Metro **not** issue the license as currently written.

Additional input or specific license changes to suggest:

We appreciate the efforts that Metro has made to improve operations at Grimm's Fuel, however, there are a number of areas where the proposed license should be improved:

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

Public Health: We have serious concerns over the potential health impacts from living downwind from this composting operation, and we request a better understanding of all the airborne emissions from the facility. We request that a 24/7 automated air quality monitoring station be setup. We have a right to know what is in the air that we are breathing. We believe that both the regulator and the operator have a moral and ethical responsibility to the community to make sure that the air around the facility is safe to breathe. We live here.

Pile Size: In consideration of the fact that Metro does not have the authority to enforce the fire code, we ask Metro to include a maximum length and width in your pile size limit.

License Term: Although the transition to ASP composting may take 18 months, the proposed license term is 5 years. Unless Metro is willing to shorten the term of the license to match the length of the transition period, we request that Metro put a condition into the license that will require an impact study to be performed after the facility has completed the transition to ASP composting.

Offsite Dust: The dust protections in the proposed license are inadequate. We request that the license require the installation of dust monitoring and sampling equipment in the surrounding neighborhoods and properties.

Offsite Odors: Considering that Metro has declined the opportunity to put any measurable odor standard in the license, we request that the license require no offsite odor. We will not tolerate nuisance odors in our homes and on our private property. Metro needs to replace the vague language of “minimize offsite odors” with an odor standard that is clear, meaningful, and measurable.

Verification: We request that the license describe the process that Metro will use to double check and confirm the veracity of all measurements taken by the operator. Self regulation is not a feasible solution when it creates a conflict of interest.

Groundwater: We demand strong protections for groundwater and stormwater. Contaminated leachate must never be discharged into our local creeks and rivers.

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

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

Transparency: We request 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.

February 4, 2019

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

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

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

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

Metro has included offsite odor restrictions in recent authorizations for other solid waste facilities. We believe that the enclosure requirements and odor performance standards that Metro currently applies to transfer stations should also be applied to composting facilities.

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

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

Grimm's: Reduce odor complaints, increase throughput.

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

Businesses: Protect property values and worker health.

Metro: Increase regional composting capacity, protect the environment.

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

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

Tualatin River: Eliminate rainfall-generated leachate.

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

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

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

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

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

From: [Metro Solid Waste Compliance](#)
To: ["Ryan Madden"](#)
Subject: RE:
Date: Tuesday, February 05, 2019 4:43:00 PM

Hello,

Thank you for your comment. More information about Metro's role and activities related to Grimm's Fuel Company can be found on our [website](#).

Thanks again,

*Hila

Hila Ritter
Solid Waste Authorization Coordinator
Property and Environmental Services
My gender pronouns: she, her, hers.
Metro | oregonmetro.gov
600 NE Grand Ave.
Portland, OR 97232-2736
503-797-1862

From: Ryan Madden [mailto: [REDACTED]@gmail.com]
Sent: Tuesday, February 05, 2019 1:32 PM
To: Metro Solid Waste Compliance < [REDACTED]@oregonmetro.gov >
Subject:

To Whom it May Concern,

I am writing to express my opinion that the proposed license for Grimm's Fuel should not be issued as written, and should be revised and improved to better meet the needs of the surrounding communities. Specifically, my concern is that the proposed license lacks adequate protections for public health, air quality, and both storm and groundwater. In addition, the proposed license is too permissive of contaminated leachate, air pollution and odor emissions. I support the position taken by Oregon Air.

Thank you for your consideration.

Regards,
Ryan Madden Tualatin, OR

From: [Metro Solid Waste Compliance](#)
To: ["Virginia Green"](#)
Subject: RE: Comments regarding Metro License for Grimm's Fuel
Date: Tuesday, February 05, 2019 10:39:00 AM

Hello,

Thank you for your comment. More information about Metro's role and activities related to Grimm's Fuel Company can be found on our [website](#).

Thanks again,
*Hila

Hila Ritter
Solid Waste Authorization Coordinator
Property and Environmental Services
My gender pronouns: she, her, hers.
Metro | oregonmetro.gov
600 NE Grand Ave.
Portland, OR 97232-2736
503-797-1862

From: Virginia Green [mailto:gin-████████@greenbunch.com]
Sent: Sunday, February 03, 2019 8:36 PM
To: Metro Solid Waste Compliance <████████@oregonmetro.gov>
Subject: Comments regarding Metro License for Grimm's Fuel

As a member of CASE I submit the following in comments on Grimms Fuel. Thank you for your consideration of these issues. I live on 135th Terrace in Pony Ridge and the license and its conditions are very important to me.

Sincerely,
Virginia Green

Identified issues:

- Section 1.8: Facility legal description (page 3 of 22) includes five tax lots owned by Grimms. Composting is only permitted on tax lots 1800 and 1900 by the City of Tualatin conditional land use permit (CUP). Tax Lots other than 1800 and 1900 should be deleted from draft license.
- Section 6: A third party qualified technician should be assigned to test

and record accurate measures of oxygen, temperature, moisture, etc.

- Section 7.16, Include: odor complaints received by Metro, to automatically be routed to DEQ, City of Tualatin and Grimm's.

From: [Metro Solid Waste Compliance](#)
To: [REDACTED]@gmail.com
Subject: RE: Form submission from: Comment on the draft license for Grimm's Fuel Company
Date: Tuesday, February 05, 2019 10:48:00 AM

Hello,

Thank you for your comment. More information about Metro's role and activities related to Grimm's Fuel Company can be found on our [website](#).

Thanks again,
*Hila

Hila Ritter
Solid Waste Authorization Coordinator
Property and Environmental Services
My gender pronouns: she, her, hers.
Metro | oregonmetro.gov
600 NE Grand Ave.
Portland, OR 97232-2736
503-797-1862

From: Website feedback form [mailto:[REDACTED]@oregonmetro.gov]
Sent: Tuesday, February 05, 2019 1:32 AM
To: Metro Solid Waste Compliance <[REDACTED]@oregonmetro.gov>
Subject: Form submission from: Comment on the draft license for Grimm's Fuel Company

Submitted on Tuesday, February 5, 2019 - 1:32am

First name: Linda
Last name: Myers
Email: [REDACTED]@gmail.com
Zip code: 97062

Do you support Metro issuing this license as written? Yes

Please explain:

For the record, I have been following this issue on Nextdoor, seeing comments from Brett Hamilton of Oregon Air. I live in Tualatin approximately 1 mile east of Brett.

I noticed some odor from the Grimm's operation last spring - it was obvious numerous times but I was not much bothered by it. I grew up in Pendleton, OR and we would drive through Milton Freewater occasionally. There was a similar smell from the pea vines breaking down after the local harvest, so I identify it as the smell of decaying vegetation.

I am a Master Gardener through the OSU Extension program, and have composted garden waste over the years. Composting is generally odorless if the material is aerated properly, so

the proposed solution will likely be effective if it is designed to handle the quantity and material they process.

I have dropped garden waste at Grimm's and purchased and used their garden compost and soil products for decades. From the testing results I have seen, they produce high quality materials with low levels of contamination. They provide a valuable recycling service and garden material for our area.

I understand that nearby residents will experience the odors at a higher level, and may be concerned about what chemicals exist on the site. It may allay these fears to share testing methods and results.

It is my hope that through implementing the recommendations of expert consultants, the odor can be reduced and Grimm's will be able to retain their operation. I would hate to see them demonized and forced out of business.

In my opinion on a related concern, the previous accusations against local art glass makers were out of proportion to the actual risk from their operations. Unique local businesses were affected - Uroborous Glass was forced to close, and Bullseye Glass underwent costly modifications exceeding government standards, as well as legal and settlement costs.

Forcing Grimms into a "poison pill" of indoor composting or other extreme measures would mean a loss to our community.

Do you have a concern that's not addressed in this license? No

Please explain:

Do you have additional input or specific changes to suggest relating to the draft license? Yes

Please explain: See comments above

From: [Metro Solid Waste Compliance](#)
To: "[REDACTED]@comcast.net"
Subject: RE: Form submission from: Comment on the draft license for Grimm's Fuel Company
Date: Tuesday, February 05, 2019 1:00:00 PM

Hello,

Thank you for your comment. More information about Metro's role and activities related to Grimm's Fuel Company can be found on our [website](#).

Thanks again,

*Hila

Hila Ritter
Solid Waste Authorization Coordinator
Property and Environmental Services
My gender pronouns: she, her, hers.
Metro | oregonmetro.gov
600 NE Grand Ave.
Portland, OR 97232-2736
503-797-1862

From: Website feedback form [mailto:[REDACTED]@oregonmetro.gov]
Sent: Tuesday, February 05, 2019 12:32 PM
To: Metro Solid Waste Compliance <[REDACTED]@oregonmetro.gov>
Subject: Form submission from: Comment on the draft license for Grimm's Fuel Company

Submitted on Tuesday, February 5, 2019 - 12:31pm

First name: Danielle
Last name: Ball
Email: [REDACTED]@comcast.net
Zip code: [REDACTED]
Do you support Metro issuing this license as written? No
Please explain: No further regulations please.
Do you have a concern that's not addressed in this license? No
Please explain:
Do you have additional input or specific changes to suggest relating to the draft license? No
Please explain:

From: [Metro Solid Waste Compliance](#)
To: [REDACTED]@msn.com"
Subject: RE: Form submission from: Comment on the draft license for Grimm's Fuel Company
Date: Monday, January 28, 2019 8:47:00 AM

Hello,

Thank you for your comment. More information about Metro's role and activities related to Grimm's Fuel Company can be found on our [website](#).

Thanks again,

*Hila

Hila Ritter
Solid Waste Authorization Coordinator
Property and Environmental Services
My gender pronouns: she, her, hers.
Metro | oregonmetro.gov
600 NE Grand Ave.
Portland, OR 97232-2736
503-797-1862

From: Website feedback form [mailto:[REDACTED]@oregonmetro.gov]
Sent: Sunday, January 27, 2019 11:15 AM
To: Metro Solid Waste Compliance <[REDACTED]@oregonmetro.gov>
Subject: Form submission from: Comment on the draft license for Grimm's Fuel Company

Submitted on Sunday, January 27, 2019 - 11:15am

First name: Debbie
Last name: Thomas
Email: [REDACTED]@msn.com
Zip code: 97035

Do you support Metro issuing this license as written? No preference

Please explain:

I live in Lake Oswego and was impacted many times last winter because of the outside stench caused by Grimms. This odor problem extends much, much wider than a one mile radius. It is 5.4 miles from my house to the facility. Last year there were many times that I was not able to be outside to work in my yard because of the smell. The smell was so strong, I thought it was coming from my neighbor's yard. I am a master gardener so working in my own yard is very important to me. I understand the new Metro restrictions include providing more oxygen into the piles to prevent the odors.

On February 7, 2018, someone posted on the Next Door social website about it and got 42 replies. This was only our neighborhood Next Door exchange. I can only imagine what other

regional Next Door discussions were. One realtor was showing a house near Wilson High School and both she and her clients could smell it. That is 11 miles away. Some folks reported thinking an animal had died under their deck.

There should be an easier way for the public to make comments on the Grimms website that perhaps go directly to Metro because Grimms never gets back to us. At least that was my experience last year. It was like talking to a wall. I felt that last year, the only way anyone knew there were high odors was after the local TV stations did stories on this. Otherwise, how does Metro know when we've had odors for 5 days in a row?

I do support this facility. I'm not sure what changed last year but I am hoping the restrictions and inspections that Metro imposes will alleviate the problem.

Do you have a concern that's not addressed in this license? No preference

Please explain:

Do you have additional input or specific changes to suggest relating to the draft license? No preference

Please explain:

From: [Metro Solid Waste Compliance](#)
To: [REDACTED]@yahoo.com"
Subject: RE: Form submission from: Comment on the draft license for Grimm's Fuel Company
Date: Tuesday, January 15, 2019 4:16:00 PM

Hello,

Thank you for your comment. More information about Metro's role and activities related to Grimm's Fuel Company can be found on our [website](#).

Thanks again,
*Hila

Hila Ritter
Solid Waste Authorization Coordinator
Property and Environmental Services
My gender pronouns: she, her, hers.
Metro | oregonmetro.gov
600 NE Grand Ave.
Portland, OR 97232-2736
503-797-1862

From: Website feedback form [mailto:[REDACTED]@oregonmetro.gov]
Sent: Tuesday, January 15, 2019 7:38 AM
To: Metro Solid Waste Compliance <[REDACTED]@oregonmetro.gov>
Subject: Form submission from: Comment on the draft license for Grimm's Fuel Company

Submitted on Tuesday, January 15, 2019 - 7:38am

First name: Elaine
Last name: Buchele
Email: [REDACTED]@yahoo.com
Zip code: 97140

Do you support Metro issuing this license as written? No preference

Please explain: I haven't read it which is why I chose no preference but I AM a Sherwood resident. I live in Woodhaven. The rotten smell is awful. My whole family complains. We should not be forced to live with compost smell 24-7 because of a company. My neighborhood is furious.

Do you have a concern that's not addressed in this license? No preference

Please explain: Again, I didn't read it. But I want Grimms to stop stinking up our town.

Do you have additional input or specific changes to suggest relating to the draft license? Yes
Please explain: It's really bad. Please help fix the problem.

From: [Metro Solid Waste Compliance](#)
To: [REDACTED]@frontier.com"
Subject: RE: Form submission from: Comment on the draft license for Grimm's Fuel Company
Date: Tuesday, February 05, 2019 10:42:00 AM

Hello,

Thank you for your comment. More information about Metro's role and activities related to Grimm's Fuel Company can be found on our [website](#).

Thanks again,

*Hila

Hila Ritter
Solid Waste Authorization Coordinator
Property and Environmental Services
My gender pronouns: she, her, hers.
Metro | oregonmetro.gov
600 NE Grand Ave.
Portland, OR 97232-2736
503-797-1862

From: Website feedback form [mailto:[REDACTED]@oregonmetro.gov]
Sent: Monday, February 04, 2019 8:33 PM
To: Metro Solid Waste Compliance <[REDACTED]@oregonmetro.gov>
Subject: Form submission from: Comment on the draft license for Grimm's Fuel Company

Submitted on Monday, February 4, 2019 - 8:32pm

First name: Marius
Last name: Brisan
Email: [REDACTED]@frontier.com
Zip code: 97062
Do you support Metro issuing this license as written? No
Please explain:
Do you have a concern that's not addressed in this license? Yes
Please explain:
The proposed license does not adequately address the following concerns:
Public Health, Human Health Risks, Public Safety
Leachate Contamination of Storm water and Groundwater
Air Pollution and Air Quality Monitoring
Particulates, Bioaerosols, Odorous Compounds
Gasses, Air Emissions, VOC's
Air Quality and Environmental Damage
At an absolute minimum, the license should include all of the performance goals stipulated in

Chapter 5 of the Metro Code section 5.01.090(c) specifically (1) Environment (2) Health and Safety and (3) Nuisances. We are unable to find any reference to “groundwater” or “public health” in the proposed license, and we believe that this license is not in compliance with Metro Code. We ask that Metro not issue the license as currently written.

Do you have additional input or specific changes to suggest relating to the draft license? Yes
Please explain:

We appreciate the efforts that Metro has made to improve operations at Grimm’s Fuel, however, there are a number of areas where the proposed license should be improved:

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

Public Health: We have serious concerns over the potential health impacts from living downwind from this composting operation, and we request a better understanding of all the airborne emissions from the facility. We request that a 24/7 automated air quality monitoring station be setup. We have a right to know what is in the air that we are breathing. We believe that both the regulator and the operator have a moral and ethical responsibility to the community to make sure that the air around the facility is safe to breathe. We live here.

Pile Size: In consideration of the fact that Metro does not have the authority to enforce the fire code, we ask Metro to include a maximum length and width in your pile size limit.

License Term: Although the transition to ASP composting may take 18 months, the proposed license term is 5 years. Unless Metro is willing to shorten the term of the license to match the length of the transition period, we request that Metro put a condition into the license that will require an impact study to be performed after the facility has completed the transition to ASP composting.

Offsite Dust: The dust protections in the proposed license are inadequate. We request that the license require the installation of dust monitoring and sampling equipment in the surrounding neighborhoods and properties.

Offsite Odors: Considering that Metro has declined the opportunity to put any measurable odor standard in the license, we request that the license require no offsite odor. We will not tolerate nuisance odors in our homes and on our private property. Metro needs to replace the vague language of “minimize offsite odors” with an odor standard that is clear, meaningful, and measurable.

Verification: We request that the license describe the process that Metro will use to double check and confirm the veracity of all measurements taken by the operator. Self regulation is not a feasible solution when it creates a conflict of interest.

Groundwater: We demand strong protections for groundwater and storm water. Contaminated leachate must never be discharged into our local creeks and rivers.

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

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

Transparency: We request 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: [REDACTED]@gmail.com"
Subject: RE: Form submission from: Comment on the draft license for Grimm's Fuel Company
Date: Tuesday, February 05, 2019 10:50:00 AM

Hello,

Thank you for your comment. More information about Metro's role and activities related to Grimm's Fuel Company can be found on our [website](#).

Thanks again,

*Hila

Hila Ritter
Solid Waste Authorization Coordinator
Property and Environmental Services
My gender pronouns: she, her, hers.
Metro | oregonmetro.gov
600 NE Grand Ave.
Portland, OR 97232-2736
503-797-1862

From: Website feedback form [mailto:[REDACTED]@oregonmetro.gov]
Sent: Tuesday, February 05, 2019 9:32 AM
To: Metro Solid Waste Compliance <[REDACTED]@oregonmetro.gov>
Subject: Form submission from: Comment on the draft license for Grimm's Fuel Company

Submitted on Tuesday, February 5, 2019 - 9:32am

First name: Marsha

Last name: Stoffer

Email: [REDACTED]@gmail.com

Zip code: 97224

Do you support Metro issuing this license as written? No

Please explain: The current license proposed does not address important environmental issues effectively.

Do you have a concern that's not addressed in this license? Yes

Please explain: Environmental issues.

Do you have additional input or specific changes to suggest relating to the draft license? Yes

Please explain: More rigorous air quality , leaching, and odor controls are needed.

From: [Metro Solid Waste Compliance](#)
To: [REDACTED]@juno.com"
Subject: RE: Form submission from: Comment on the draft license for Grimm's Fuel Company
Date: Tuesday, February 05, 2019 10:49:00 AM

Hello,

Thank you for your comment. More information about Metro's role and activities related to Grimm's Fuel Company can be found on our [website](#).

Thanks again,
*Hila

Hila Ritter
Solid Waste Authorization Coordinator
Property and Environmental Services
My gender pronouns: she, her, hers.
Metro | oregonmetro.gov
600 NE Grand Ave.
Portland, OR 97232-2736
503-797-1862

From: Website feedback form [mailto:[REDACTED]@oregonmetro.gov]
Sent: Tuesday, February 05, 2019 9:16 AM
To: Metro Solid Waste Compliance <[REDACTED]@oregonmetro.gov>
Subject: Form submission from: Comment on the draft license for Grimm's Fuel Company

Submitted on Tuesday, February 5, 2019 - 9:16am

First name: Martha
Last name: Iancu
Email: [REDACTED]@juno.com
Zip code: 97224

Do you support Metro issuing this license as written? No preference
Please explain: I think that this draft is much improved over the previous one. I appreciate how people's concerns were addressed (such as the 10% aeration minimum). I have also looked at the response by Oregon Air to house the composting process in a building, with the promise to help do fundraising to support building costs. I think it would be good for Metro and Grimms to carefully consider the proposal by Oregon Air. I wonder if it would be possible to do both. In the short term, issue the license as drafted, with the commitment to add a building in the future, and maybe require future compost operations throughout the Metro area to be housed in a building. This would prevent community unhappiness about odors, dust, and leachate and make composting a more welcome service in any community.
Do you have a concern that's not addressed in this license? Yes
Please explain: See above.

Do you have additional input or specific changes to suggest relating to the draft license? Yes
Please explain: See above.

From: [Metro Solid Waste Compliance](#)
To: [REDACTED]@yahoo.com"
Subject: RE: Form submission from: Comment on the draft license for Grimm's Fuel Company
Date: Tuesday, February 05, 2019 10:39:00 AM

Hello,

Thank you for your comment. More information about Metro's role and activities related to Grimm's Fuel Company can be found on our [website](#).

Thanks again,

*Hila

Hila Ritter
Solid Waste Authorization Coordinator
Property and Environmental Services
My gender pronouns: she, her, hers.
Metro | oregonmetro.gov
600 NE Grand Ave.
Portland, OR 97232-2736
503-797-1862

From: Website feedback form [mailto:[REDACTED]@oregonmetro.gov]
Sent: Sunday, February 03, 2019 12:13 PM
To: Metro Solid Waste Compliance <[REDACTED]@oregonmetro.gov>
Subject: Form submission from: Comment on the draft license for Grimm's Fuel Company

Submitted on Sunday, February 3, 2019 - 12:13pm

First name: Rachel

Last name: Albers

Email: [REDACTED]@yahoo.com

Zip code: 97062

Do you support Metro issuing this license as written? No

Please explain:

Do you have a concern that's not addressed in this license? Yes

Please explain: Air quality, air pollution leading to lower quality of life and decreased property values.

Do you have additional input or specific changes to suggest relating to the draft license? Yes

Please explain: Stronger provisions to account for increased noxious odors. We've lived in Tualatin for 15 years; however, it's only been in the last few years that the smell has gotten so extreme so frequently. The argument that they've always been here is just a red herring. It never used to be the bad, and we live too far away to have considered this when we bought. Now, I worry we will be the towns that smell too bad to live in (like Albany used to be) and we will stifle all our economic and real estate growth values. When the odor complaints reach as far as Tigard, King City, Tualatin, Portland and beyond, we have reached a critical breaking

point. Thank you for your consideration.

From: [Metro Solid Waste Compliance](#)
To: [REDACTED]@hotmail.com"
Subject: RE: Form submission from: Comment on the draft license for Grimm's Fuel Company
Date: Wednesday, January 23, 2019 9:26:00 AM

Hello,

Thank you for your comment. More information about Metro's role and activities related to Grimm's Fuel Company can be found on our [website](#).

Thanks again,

*Hila

Hila Ritter
Solid Waste Authorization Coordinator
Property and Environmental Services
My gender pronouns: she, her, hers.
Metro | oregonmetro.gov
600 NE Grand Ave.
Portland, OR 97232-2736
503-797-1862

From: Website feedback form [mailto:[REDACTED]@oregonmetro.gov]
Sent: Monday, January 21, 2019 8:43 AM
To: Metro Solid Waste Compliance <[REDACTED]@oregonmetro.gov>
Subject: Form submission from: Comment on the draft license for Grimm's Fuel Company

Submitted on Monday, January 21, 2019 - 8:42am

First name: Robert
Last name: Bosak
Email: [REDACTED]@hotmail.com
Zip code: 97062

Do you support Metro issuing this license as written? Yes

Please explain: Yes. To control the odor, allow Grimms to build a digester which will help with the odor. I have been taking yard material to them for over 20 years. They provide an invaluable service in recycling of material that would otherwise go to landfill.

Do you have a concern that's not addressed in this license? No

Please explain:

Do you have additional input or specific changes to suggest relating to the draft license? No

Please explain:

From: [Metro Solid Waste Compliance](#)
To: [REDACTED]@comcast.net
Subject: RE: Form submission from: Comment on the draft license for Grimm's Fuel Company
Date: Monday, January 28, 2019 8:47:00 AM

Hello,

Thank you for your comment. More information about Metro's role and activities related to Grimm's Fuel Company can be found on our [website](#).

Thanks again,

*Hila

Hila Ritter
Solid Waste Authorization Coordinator
Property and Environmental Services
My gender pronouns: she, her, hers.
Metro | oregonmetro.gov
600 NE Grand Ave.
Portland, OR 97232-2736
503-797-1862

From: Website feedback form [mailto:[REDACTED]@oregonmetro.gov]
Sent: Saturday, January 26, 2019 8:47 PM
To: Metro Solid Waste Compliance <[REDACTED]@oregonmetro.gov>
Subject: Form submission from: Comment on the draft license for Grimm's Fuel Company

Submitted on Saturday, January 26, 2019 - 8:47pm

First name: Janet Hall
Last name: McBride
Email: [REDACTED]@comcast.net
Zip code: 97224

Do you support Metro issuing this license as written? No

Please explain: I believe the aerated static pile requirement is not based on an actual need. I have lived in my house off 99W near Canterbury Lane for over 40 years and have never smelled anything in this area that could be attributed to Grimm's fuel. Even when driving south to Sherwood, I have only noticed a smell when right by Grimm's. Even then, it is just an earthy smell and not unpleasant. I find it annoying that others are really going overboard with their complaints.

Do you have a concern that's not addressed in this license? No

Please explain:

Do you have additional input or specific changes to suggest relating to the draft license? Yes

Please explain:

I am a customer of Pride Disposal who uses Grimm's. Pride Disposal has already had a couple of rate increases due to loss of the China market and probably labor increases. I am sure they will rightfully want to pass on higher costs at Grimm's to me. I am also concerned the small, privately owned landscaping companies will have to pay increased dropoff fees which will affect their profitability. My real concern is that a group of people will not be happy until they are able to close Grimm's completely. This would be a disservice to the whole area. It would affect all of us who rely on Grimm's to drop off yard debris, to have mulch delivered to our homes, to small businesses as I have already mentioned. I hate to think how much Pride will charge me if they have to drive to Yamhill county or beyond. If Grimm's were to close, Metro would have to figure out how to handle all the plastic bags that homeowners would be putting in their trash because they would be forced to buy all their mulch at Home Depot or Lowes. There would be an increase in yard debris piled in homeowners backyards because of increased costs to dispose of it.

(Congratulations on your excellent spell checker!)

From: [Metro Solid Waste Compliance](#)
To: ["Janine W"](#)
Subject: RE: Form submission from: Comment on the draft license for Grimm's Fuel Company
Date: Tuesday, February 05, 2019 10:41:00 AM

Hello,

Thank you for your comment. More information about Metro's role and activities related to Grimm's Fuel Company can be found on our [website](#).

Thanks again,

*Hila

Hila Ritter
Solid Waste Authorization Coordinator
Property and Environmental Services
My gender pronouns: she, her, hers.
Metro | oregonmetro.gov
600 NE Grand Ave.
Portland, OR 97232-2736
503-797-1862

From: Website feedback form [mailto:████████@oregonmetro.gov]
Sent: Monday, February 04, 2019 8:06 PM
To: Metro Solid Waste Compliance <████████@oregonmetro.gov>
Subject: Form submission from: Comment on the draft license for Grimm's Fuel Company

Submitted on Monday, February 4, 2019 - 8:05pm

First name: Janine
Last name: Wilson
Email: ██████████@gmail.com
Zip code: 97062

Do you support Metro issuing this license as written? No

Please explain: I believe the license should be amended to only include the two tax lots in which composting is permitted by the Tualatin CUP. Under "1.8 Facility Legal Description" of the draft license, all five lots owned by Grimms are included. Land use on additional tax lots should only follow public hearings conducted by the City and NOT be sanctioned by Metro at this time.

Do you have a concern that's not addressed in this license? Yes

Please explain: A third party qualified technician should be assigned to test oxygen and temperature. The community needs this independent monitor to assure conformance with license requirements.

Do you have additional input or specific changes to suggest relating to the draft license? Yes

Please explain: Under the odor and dust complaint requirements, Metro should require a

system with a single point of contact to notify Grimms, DEQ and City of Tualatin.

From: [Metro Solid Waste Compliance](#)
To: [REDACTED]@gmail.com
Subject: RE: Form submission from: Comment on the draft license for Grimm's Fuel Company
Date: Friday, February 01, 2019 4:09:00 PM

Hello,

Thank you for your comment. More information about Metro's role and activities related to Grimm's Fuel Company can be found on our [website](#).

Thanks again,

*Hila

Hila Ritter
Solid Waste Authorization Coordinator
Property and Environmental Services
My gender pronouns: she, her, hers.
Metro | oregonmetro.gov
600 NE Grand Ave.
Portland, OR 97232-2736
503-797-1862

From: Website feedback form [mailto:[REDACTED]@oregonmetro.gov]
Sent: Friday, February 01, 2019 4:02 PM
To: Metro Solid Waste Compliance <[REDACTED]@oregonmetro.gov>
Subject: Form submission from: Comment on the draft license for Grimm's Fuel Company

Submitted on Friday, February 1, 2019 - 4:01pm

First name: Leland
Last name: Richey
Email: [REDACTED]@gmail.com
Zip code: 97062

Do you support Metro issuing this license as written? Yes

Please explain: I asked several questions before of the opponents for this new license and never got any satisfactory answers. 1. How many days per year is this a problem? 2. What are the exact boundaries of where the odor is most noticeable and how many homes are affected? 3. Who, exactly has been injured and required a doctor's treatment by these odors? 4. What was the extent and cost of their treatment? 5. How much will Grimms have to raise their prices after any proposed improvements are made? So until those questions are fully answered I fully support Metro issuing this license as written.

Do you have a concern that's not addressed in this license? No

Please explain:

Do you have additional input or specific changes to suggest relating to the draft license? No

Please explain:

From: [Metro Solid Waste Compliance](#)
To: "[REDACTED]@yahoo.com"
Subject: RE: Form submission from: Comment on the draft license for Grimm's Fuel Company
Date: Tuesday, February 05, 2019 12:12:00 PM

Hello,

Thank you for your comment. More information about Metro's role and activities related to Grimm's Fuel Company can be found on our [website](#).

Thanks again,
*Hila

Hila Ritter
Solid Waste Authorization Coordinator
Property and Environmental Services
My gender pronouns: she, her, hers.
Metro | oregonmetro.gov
600 NE Grand Ave.
Portland, OR 97232-2736
503-797-1862

From: Website feedback form [mailto:[REDACTED]@oregonmetro.gov]
Sent: Tuesday, February 05, 2019 12:05 PM
To: Metro Solid Waste Compliance <[REDACTED]@oregonmetro.gov>
Subject: Form submission from: Comment on the draft license for Grimm's Fuel Company

Submitted on Tuesday, February 5, 2019 - 12:04pm

First name: Russell
Last name: Davis
Email: [REDACTED]@yahoo.com
Zip code: 97062

Do you support Metro issuing this license as written? No

Please explain: "Minimize offsite odors" is not acceptable. Other businesses here in Tualatin are not allowed to discharge nuisance odors. Metro needs to establish real, measurable standards for odor.

Do you have a concern that's not addressed in this license? Yes

Please explain: See above.

Do you have additional input or specific changes to suggest relating to the draft license? Yes

Please explain: As long as Grimm's is allowed to be a "nuisance neighbor" there will likely be no development of the properties surrounding it. The potential tax revenue lost by the communities around Grimm's should be sounding alarms.

From: [Metro Solid Waste Compliance](#)
To: [REDACTED]@gmail.com"
Subject: RE: Form submission from: Comment on the draft license for Grimm's Fuel Company
Date: Tuesday, February 05, 2019 4:44:00 PM

Hello,

Thank you for your comment. More information about Metro's role and activities related to Grimm's Fuel Company can be found on our [website](#).

Thanks again,

*Hila

Hila Ritter
Solid Waste Authorization Coordinator
Property and Environmental Services
My gender pronouns: she, her, hers.
Metro | oregonmetro.gov
600 NE Grand Ave.
Portland, OR 97232-2736
503-797-1862

From: Website feedback form [mailto:[REDACTED]@oregonmetro.gov]
Sent: Tuesday, February 05, 2019 2:18 PM
To: Metro Solid Waste Compliance <[REDACTED]@oregonmetro.gov>
Subject: Form submission from: Comment on the draft license for Grimm's Fuel Company

Submitted on Tuesday, February 5, 2019 - 2:18pm

First name: Joyce
Last name: Atkins
Email: [REDACTED]@gmail.com
Zip code: 97062

Do you support Metro issuing this license as written? No

Please explain:

The proposed license does not adequately address the following concerns:

- Public Health, Human Health Risks, Public Safety
- Leachate Contamination of Storm Water and Groundwater
- Air Pollution and Air Quality Monitoring
- Particulates, Bioaerosols, Odorous Compounds
- Gasses, Air Emissions, VOC's
- Air Quality and Environmental Damage

At an absolute minimum, the license should include all of the performance goals stipulated in Chapter 5 of the Metro Code section 5.01.090(c) specifically (1) Environment (2) Health and

Safety and (3) Nuisances. We are unable to find any reference to “groundwater” or “public health” in the proposed license, and we believe that this license is not in compliance with Metro Code. We ask that Metro not issue the license as currently written.

I would like to also say that we at Angel Haven, which is across the street from Grimm's have been smelling this awful smell for the last two years on a daily basis. It is nauseating and hard to be outside doing an activity, gardening or just sitting on your patio deck with company eating. Disgusting. The particulate matter that is going in to the air from the piles being turned can be measured. Everyone's noses are different but so many people even out of our area smell the foul odor. I played tennis with a friend the other day who lives off SW Ibach and SW Boones Ferry Rd in Tualatin by Ibach Park and they neighbors smell it all the time and did not know who to report it too. She does now. In other words it is not just in our neighborhood, a whole lot of others have issues with Grimm's but Metro has not got the word out to people about whom to contact. There are so many businesses and housing developments that were not here when they started their business and they need to improve their facilities forever, not just for a stop gap. Allowing them to have a five year license means without any accountability of what height of the piles could become, control the particulate matter, which they can do, especially if they build an indoor facility, which would solve everyone's concerns.

Thank you.

Do you have a concern that's not addressed in this license? Yes

Please explain: We appreciate the efforts that Metro has made to improve operations at Grimm's Fuel, however, there are a number of areas where the proposed license should be improved:

Do you have additional input or specific changes to suggest relating to the draft license? Yes

Please explain:

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

Public Health: We have serious concerns over the potential health impacts from living downwind from this composting operation, and we request a better understanding of all the airborne emissions from the facility. We request that a 24/7 automated air quality monitoring station be setup. We have a right to know what is in the air that we are breathing. We believe that both the regulator and the operator have a moral and ethical responsibility to the community to make sure that the air around the facility is safe to breathe. We live here.

Pile Size: In consideration of the fact that Metro does not have the authority to enforce the fire code, we ask Metro to include a maximum length and width in your pile size limit.

License Term: Although the transition to ASP composting may take 18 months, the proposed license term is 5 years. Unless Metro is willing to shorten the term of the license to match the length of the transition period, we request that Metro put a condition into the license that will require an impact study to be performed after the facility has completed the transition to ASP composting.

Offsite Dust: The dust protections in the proposed license are inadequate. We request that the license require the installation of dust monitoring and sampling equipment in the surrounding neighborhoods and properties.

Offsite Odors: Considering that Metro has declined the opportunity to put any measurable odor standard in the license, we request that the license require no offsite odor. We will not

tolerate nuisance odors in our homes and on our private property. Metro needs to replace the vague language of “minimize offsite odors” with an odor standard that is clear, meaningful, and measurable.

Verification: We request that the license describe the process that Metro will use to double check and confirm the veracity of all measurements taken by the operator. Self regulation is not a feasible solution when it creates a conflict of interest.

Groundwater: We demand strong protections for groundwater and stormwater. Contaminated leachate must never be discharged into our local creeks and rivers.

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

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

Transparency: We request 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: [REDACTED]@gmail.com"
Subject: RE: Form submission from: Comment on the draft license for Grimm's Fuel Company
Date: Friday, February 01, 2019 1:15:00 PM

Hello,

Thank you for your comment. More information about Metro's role and activities related to Grimm's Fuel Company can be found on our [website](#).

Thanks again,

*Hila

Hila Ritter
Solid Waste Authorization Coordinator
Property and Environmental Services
My gender pronouns: she, her, hers.
Metro | oregonmetro.gov
600 NE Grand Ave.
Portland, OR 97232-2736
503-797-1862

From: Website feedback form [mailto:[REDACTED]@oregonmetro.gov]
Sent: Friday, February 01, 2019 12:55 PM
To: Metro Solid Waste Compliance <[REDACTED]@oregonmetro.gov>
Subject: Form submission from: Comment on the draft license for Grimm's Fuel Company

Submitted on Friday, February 1, 2019 - 12:54pm

First name: Sue
Last name: Davis
Email: [REDACTED]@gmail.com
Zip code: 97062
Do you support Metro issuing this license as written? No
Please explain:
The proposed license lacks adequate protections for:
• Public Health
• Air Quality
• Stormwater and Groundwater

The proposed License is too permissive of:
• Contaminated Leachate
• Air Pollution and Odor Emissions

Do you have a concern that's not addressed in this license? Yes

Please explain: There needs to be a better reporting system in place for odor complaints. Do you have additional input or specific changes to suggest relating to the draft license? Yes Please explain:

We appreciate the efforts that Metro has made to improve operations at Grimm's Fuel, however, there are a number of areas where the proposed license should be improved:

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

Public Health: We have serious concerns over the potential health impacts from living downwind from this composting operation, and we request a better understanding of all the airborne emissions from the facility. We request that a 24/7 automated air quality monitoring station be setup. We have a right to know what is in the air that we are breathing. We believe that both the regulator and the operator have a moral and ethical responsibility to the community to make sure that the air around the facility is safe to breathe. We live here.

Pile Size: In consideration of the fact that Metro does not have the authority to enforce the fire code, we ask Metro to include a maximum length and width in your pile size limit.

License Term: Although the transition to ASP composting may take 18 months, the proposed license term is 5 years. Unless Metro is willing to shorten the term of the license to match the length of the transition period, we request that Metro put a condition into the license that will require an impact study to be performed after the facility has completed the transition to ASP composting.

Offsite Dust: The dust protections in the proposed license are inadequate. We request that the license require the installation of dust monitoring and sampling equipment in the surrounding neighborhoods and properties.

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

Verification: We request that the license describe the process that Metro will use to double check and confirm the veracity of all measurements taken by the operator. Self regulation is not a feasible solution when it creates a conflict of interest.

Groundwater: We demand strong protections for groundwater and stormwater. Contaminated leachate must never be discharged into our local creeks and rivers.

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

Indoor Composting: In order to protect the health, safety, and property of the people who live and work near the facility, and considering the adverse conditions that we have lived under for the past many years, plus the fact that we are being asked to endure even more dust and odor conditions going forward, we respectfully request that the parties take a serious look at indoor

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

Transparency: We request 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: [REDACTED]@yahoo.com"
Subject: RE: Form submission from: Comment on the draft license for Grimm's Fuel Company
Date: Wednesday, January 09, 2019 4:13:00 PM

Hello,

Thank you for your comment. More information about Metro's role and activities related to Grimm's Fuel Company can be found on our [website](#).

Thanks again,

*Hila

Hila Ritter
Solid Waste Authorization Coordinator
Property and Environmental Services
My gender pronouns: she, her, hers.
Metro | oregonmetro.gov
600 NE Grand Ave.
Portland, OR 97232-2736
503-797-1862

From: Website feedback form [mailto:[REDACTED]@oregonmetro.gov]
Sent: Wednesday, January 09, 2019 2:52 PM
To: Metro Solid Waste Compliance <[REDACTED]@oregonmetro.gov>
Subject: Form submission from: Comment on the draft license for Grimm's Fuel Company

Submitted on Wednesday, January 9, 2019 - 2:52pm

First name: Susan Diane
Last name: Rudin
Email: [REDACTED]@yahoo.com
Zip code: 97062

Do you support Metro issuing this license as written? No

Please explain: They need to upgrade their process so that the odor does not come into our neighborhood. It is awful and is usually in my area twice a week.

Do you have a concern that's not addressed in this license? Yes

Please explain: They need to cover the mounds of recycled wood as a modern facility would.

Do you have additional input or specific changes to suggest relating to the draft license? No

Please explain:

From: [Metro Solid Waste Compliance](#)
To: [Ata Saedi \(\[REDACTED\]@hotmail.com\)](#)
Subject: RE: Form submission from: Comment on the draft license for Grimm's Fuel Company
Date: Tuesday, February 05, 2019 10:39:00 AM

Hello,

Thank you for your comment. More information about Metro's role and activities related to Grimm's Fuel Company can be found on our [website](#).

Thanks again,

*Hila

Hila Ritter
Solid Waste Authorization Coordinator
Property and Environmental Services
My gender pronouns: she, her, hers.
Metro | oregonmetro.gov
600 NE Grand Ave.
Portland, OR 97232-2736
503-797-1862

From: Website feedback form [mailto:[REDACTED]@oregonmetro.gov]
Sent: Saturday, February 02, 2019 11:02 PM
To: Metro Solid Waste Compliance <[REDACTED]@oregonmetro.gov>
Subject: Form submission from: Comment on the draft license for Grimm's Fuel Company

Submitted on Saturday, February 2, 2019 - 11:02pm

First name: Ted
Last name: Saedi
Email: [REDACTED]@hotmail.com
Zip code: 97062

Do you support Metro issuing this license as written? No

Please explain: The current draft license does not adequately protect Grimm's neighbors from odor/dust and does not grantee the revival of our livability.

Do you have a concern that's not addressed in this license? Yes

Please explain:

-No throughput limitations

-Compost facilities, such as Grimm's can have unlimited odor repetitions or as strong of an offensive odor with no consequences

-Odor and dust must stay within Grimm's facility boundary

- Metro is not willing to consider emission of malodorous stench as being offensive

-A definite date of each stage of aeration project be determined and be announced, in addition,

any further extension period to these dates not to be allowed.

-An independent and a third party monitoring body be hired by Metro to report progress and completion at each stage.

We believe that by implementing the above two requests, Grimm's neighbors will be more at ease.

-Only an enclosed and covered compost operations should be allowed in a populated residential neighborhood.

Do you have additional input or specific changes to suggest relating to the draft license? Yes
Please explain:

-Section 1.8: Facility legal description (page 3 of 22) includes five tax lots owned by Grimms. Composting is only permitted on tax lots 1800 and 1900 by the City of Tualatin conditional land use permit (CUP). Tax Lots other than 1800 and 1900 should be deleted from draft license.

- Section 6: A third party qualified technician should be assigned to test and record accurate measures of oxygen, temperature, moisture, etc.

-Section 7.16, Include: odor complaints received by Metro, to automatically be routed to DEQ, City of Tualatin and Grimm's.

From: [Metro Solid Waste Compliance](#)
To: [REDACTED]@gmail.com
Subject: RE: Form submission from: Comment on the draft license for Grimm's Fuel Company
Date: Friday, February 01, 2019 3:25:00 PM

Hello,

Thank you for your comment. More information about Metro's role and activities related to Grimm's Fuel Company can be found on our [website](#).

Thanks again,

*Hila

Hila Ritter
Solid Waste Authorization Coordinator
Property and Environmental Services
My gender pronouns: she, her, hers.
Metro | oregonmetro.gov
600 NE Grand Ave.
Portland, OR 97232-2736
503-797-1862

From: Website feedback form [mailto:[REDACTED]@oregonmetro.gov]
Sent: Friday, February 01, 2019 2:48 PM
To: Metro Solid Waste Compliance <[REDACTED]@oregonmetro.gov>
Subject: Form submission from: Comment on the draft license for Grimm's Fuel Company

Submitted on Friday, February 1, 2019 - 2:48pm

First name: June
Last name: Moore
Email: [REDACTED]@gmail.com
Zip code: 97062

Do you support Metro issuing this license as written? No

Please explain:

For Public Health: request setting up a 24/7 automated air quality monitoring station to monitor the air that we are breathing. The air needs to be safe to breathe. There are houses less than one-half mile away who suffer odor fumes and dust particles; unsafe environment. Protect the groundwater by preventing contamination by adding strong protection. Indoor Composting protects the health, safety of the surrounding neighborhood people. Health over profit. Be specific, not vague, in the licensing verbiage.

We need a long term solution. The chemical is hazardous to breathe unless you have lived close by, you don't know what it is like.

Do you have a concern that's not addressed in this license? Yes

Please explain: Offsite dust and Offsite Odors: I have lived across the Grimms website, one-half mile away. The last two years there has been noxious odors and when it is windy, very

hard to breathe. I can't help but feel there are carcinogens not looked at or addressed in this license. If people develop cancer due to lack of public health concerns, but more to do with profit, then that is bad and could be considered liable for damages to human health.

Do you have additional input or specific changes to suggest relating to the draft license? Yes
Please explain:

The proposed license lacks adequate protections for:

- Public Health
- Air Quality
- Stormwater and Groundwater

The proposed license is too permissive of:

- Contaminated Leachate
- Air Pollution and Odor Emissions

From: [Metro Solid Waste Compliance](#)
To: "todd [REDACTED]@outlook.com"
Subject: RE: Form submission from: Comment on the draft license for Grimm's Fuel Company
Date: Wednesday, January 09, 2019 11:13:00 AM

Hello,

Thank you for your comment. More information about Metro's role and activities related to Grimm's Fuel Company can be found on our [website](#).

Thanks again,
*Hila

Hila Ritter
Solid Waste Authorization Coordinator
Property and Environmental Services
My gender pronouns: she, her, hers.
Metro | oregonmetro.gov
600 NE Grand Ave.
Portland, OR 97232-2736
503-797-1862

From: Website feedback form [mailto:[REDACTED]@oregonmetro.gov]
Sent: Wednesday, January 09, 2019 9:42 AM
To: Metro Solid Waste Compliance <[REDACTED]@oregonmetro.gov>
Subject: Form submission from: Comment on the draft license for Grimm's Fuel Company

Submitted on Wednesday, January 9, 2019 - 9:42am

First name: Todd
Last name: Garcia
Email: [todd_\[REDACTED\]@outlook.com](mailto:todd_[REDACTED]@outlook.com)
Zip code: 97224

Do you support Metro issuing this license as written? No

Please explain:

The sections dealing with odor are weak. I feel that a good lawyer will easily find a way around the current wording. A phrase like "control and minimize" (5.7) needw to be strengthened to something like "control and eliminate" or "control and fully contain to the property boundary".

Also several sections state that complaint records need to be kept for 1 year. Since this license is for 4 years, complaint records should be kept for the entire 4 years. The full complaint record will be useful to establish patterns of operating behavior for the next license in 2023.

Do you have a concern that's not addressed in this license? Yes

Please explain: This license does not describe specific goals for odors. Instead it defers them

to a separate document (Odor Minimization Plan). I believe that the specific goals for the next 4 years should be stated in this license and only the implementation details of that plan be described in separate documents. To protect against goals that prove to be too hard to achieve, a waiver system can be implemented too. Without the specific goals (nouns, numbers, dates) in the license, the operator could conceivably fail the approved Odor Min Plan over time but never be in jeopardy of losing their license. This effectively makes the Odor Min Plan and the Odor sections of this license moot.

Do you have additional input or specific changes to suggest relating to the draft license? No
Please explain:

From: [Metro Solid Waste Compliance](#)
To: [REDACTED] [tualatinriverkeepers.org](mailto:[REDACTED]@tualatinriverkeepers.org)
Subject: RE: Form submission from: Comment on the draft license for Grimm's Fuel Company
Date: Tuesday, February 05, 2019 10:51:00 AM

Hello,

Thank you for your comment. More information about Metro's role and activities related to Grimm's Fuel Company can be found on our [website](#).

Thanks again,

*Hila

Hila Ritter
Solid Waste Authorization Coordinator
Property and Environmental Services
My gender pronouns: she, her, hers.
Metro | oregonmetro.gov
600 NE Grand Ave.
Portland, OR 97232-2736
503-797-1862

From: Website feedback form [mailto:[REDACTED]@oregonmetro.gov]
Sent: Tuesday, February 05, 2019 9:59 AM
To: Metro Solid Waste Compliance <[REDACTED]@oregonmetro.gov>
Subject: Form submission from: Comment on the draft license for Grimm's Fuel Company

Submitted on Tuesday, February 5, 2019 - 9:58am

First name: Ashley
Last name: Short
Email: [REDACTED] [tualatinriverkeepers.org](mailto:[REDACTED]@tualatinriverkeepers.org)
Zip code: 97062

Do you support Metro issuing this license as written? No

Please explain: Tualatin Riverkeepers is a community-based organization that protects and restores the Tualatin River watershed. We build watershed stewardship through engagement, advocacy, restoration, access, and education. We appreciate the opportunity to comment on the renewal application for Grimm's Fuel. TRK does not support the license as written because the draft is not as protective of water quality as it should be. Leachate and storm-water run-off are only mentioned briefly in the documents, which is concerning given the level of construction contemplated by the new standards. TRK supports changing the composting facility to an aerobic system but wants to ensure that during the construction and after the construction leachate and storm-water are captured and properly disposed of and/or treated. Do you have a concern that's not addressed in this license? Yes

Please explain: Tualatin Riverkeepers' primary concern is the production and handling of

leachate and storm-water. In the current draft of the license there is no mention of tailored storm-water and leachate plans for the construction that will be needed to implement the aerobic system required by the license. During construction there is likely to be an increased volume of storm-water and possibly an increase in leachate depending on which alternative is picked. The license as written does not specifically require Grimm's to account of this potential increase in storm-water and leachate.

Do you have additional input or specific changes to suggest relating to the draft license? Yes
Please explain: Tualatin Riverkeepers' requests that Metro include language requiring Grimm's Fuel to implement best management practices to ensure leachate is captured and disposed of properly at all times, including during any construction needed to implement the rest of the license. The license should also require storm-water best management practices at all times, including during any construction needed to implement the rest of the license. Additionally, any management and/or treatment processes used for the run-off and leachate should have sufficient capacity to treat or manage a peak storm event. The system used to capture leachate should not be designed to overflow in any circumstance and the license should contain language to that effect.

From: [Metro Solid Waste Compliance](#)
To: [REDACTED]@yahoo.com"
Subject: RE: Form submission from: Comment on the draft license for Grimm's Fuel Company
Date: Tuesday, February 05, 2019 10:53:00 AM

Hello,

Thank you for your comment. More information about Metro's role and activities related to Grimm's Fuel Company can be found on our [website](#).

Thanks again,

*Hila

Hila Ritter
Solid Waste Authorization Coordinator
Property and Environmental Services
My gender pronouns: she, her, hers.
Metro | oregonmetro.gov
600 NE Grand Ave.
Portland, OR 97232-2736
503-797-1862

From: Website feedback form [mailto:[REDACTED]@oregonmetro.gov]
Sent: Monday, February 04, 2019 9:27 PM
To: Metro Solid Waste Compliance <[REDACTED]@oregonmetro.gov>
Subject: Form submission from: Comment on the draft license for Grimm's Fuel Company

Submitted on Monday, February 4, 2019 - 9:27pm

First name: Alison
Last name: Craker
Email: [REDACTED]@yahoo.com
Zip code: 97062

Do you support Metro issuing this license as written? No

Please explain:

Do you have a concern that's not addressed in this license? Yes

Please explain:

The proposed license does not adequately address the following concerns:

Public Health, Human Health Risks, Public Safety
Leachate Contamination of Stormwater and Groundwater
Air Pollution and Air Quality Monitoring
Particulates, Bioaerosols, Odorous Compounds
Gasses, Air Emissions, VOC's
Air Quality and Environmental Damage

At an absolute minimum, the license should include all of the performance goals stipulated in Chapter 5 of the Metro Code section 5.01.090(c) specifically (1) Environment (2) Health and Safety and (3) Nuisances. We are unable to find any reference to “groundwater” or “public health” in the proposed license, and we believe that this license is not in compliance with Metro Code. We ask that Metro not issue the license as currently written.

Do you have additional input or specific changes to suggest relating to the draft license? Yes Please explain:

We appreciate the efforts that Metro has made to improve operations at Grimm’s Fuel, however, there are a number of areas where the proposed license should be improved:

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

Public Health: We have serious concerns over the potential health impacts from living downwind from this composting operation, and we request a better understanding of all the airborne emissions from the facility. We request that a 24/7 automated air quality monitoring station be setup. We have a right to know what is in the air that we are breathing. We believe that both the regulator and the operator have a moral and ethical responsibility to the community to make sure that the air around the facility is safe to breathe. We live here.

Pile Size: In consideration of the fact that Metro does not have the authority to enforce the fire code, we ask Metro to include a maximum length and width in your pile size limit.

License Term: Although the transition to ASP composting may take 18 months, the proposed license term is 5 years. Unless Metro is willing to shorten the term of the license to match the length of the transition period, we request that Metro put a condition into the license that will require an impact study to be performed after the facility has completed the transition to ASP composting.

Offsite Dust: The dust protections in the proposed license are inadequate. We request that the license require the installation of dust monitoring and sampling equipment in the surrounding neighborhoods and properties.

Offsite Odors: Considering that Metro has declined the opportunity to put any measurable odor standard in the license, we request that the license require no offsite odor. We will not tolerate nuisance odors in our homes and on our private property. Metro needs to replace the vague language of “minimize offsite odors” with an odor standard that is clear, meaningful, and measurable.

Verification: We request that the license describe the process that Metro will use to double check and confirm the veracity of all measurements taken by the operator. Self regulation is not a feasible solution when it creates a conflict of interest.

Groundwater: We demand strong protections for groundwater and stormwater. Contaminated leachate must never be discharged into our local creeks and rivers.

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

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

Transparency: We request 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: [REDACTED]
Subject: RE: Form submission from: Comment on the draft license for Grimm's Fuel Company
Date: Tuesday, February 05, 2019 10:53:00 AM

Hello,

Thank you for your comment. More information about Metro's role and activities related to Grimm's Fuel Company can be found on our [website](#).

Thanks again,
*Hila

Hila Ritter
Solid Waste Authorization Coordinator
Property and Environmental Services
My gender pronouns: she, her, hers.
Metro | oregonmetro.gov
600 NE Grand Ave.
Portland, OR 97232-2736
503-797-1862

From: Website feedback form [mailto:[REDACTED]@oregonmetro.gov]
Sent: Monday, February 04, 2019 9:27 PM
To: Metro Solid Waste Compliance <[REDACTED]@oregonmetro.gov>
Subject: Form submission from: Comment on the draft license for Grimm's Fuel Company

Submitted on Monday, February 4, 2019 - 9:27pm

First name: Alison
Last name: Craker
Email: [REDACTED]
Zip code: 97062
Do you support Metro issuing this license as written? No
Please explain:
Do you have a concern that's not addressed in this license? Yes
Please explain:
The proposed license does not adequately address the following concerns:

Public Health, Human Health Risks, Public Safety
Leachate Contamination of Stormwater and Groundwater
Air Pollution and Air Quality Monitoring
Particulates, Bioaerosols, Odorous Compounds
Gasses, Air Emissions, VOC's
Air Quality and Environmental Damage

At an absolute minimum, the license should include all of the performance goals stipulated in Chapter 5 of the Metro Code section 5.01.090(c) specifically (1) Environment (2) Health and Safety and (3) Nuisances. We are unable to find any reference to “groundwater” or “public health” in the proposed license, and we believe that this license is not in compliance with Metro Code. We ask that Metro not issue the license as currently written.

Do you have additional input or specific changes to suggest relating to the draft license? Yes Please explain:

We appreciate the efforts that Metro has made to improve operations at Grimm’s Fuel, however, there are a number of areas where the proposed license should be improved:

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

Public Health: We have serious concerns over the potential health impacts from living downwind from this composting operation, and we request a better understanding of all the airborne emissions from the facility. We request that a 24/7 automated air quality monitoring station be setup. We have a right to know what is in the air that we are breathing. We believe that both the regulator and the operator have a moral and ethical responsibility to the community to make sure that the air around the facility is safe to breathe. We live here.

Pile Size: In consideration of the fact that Metro does not have the authority to enforce the fire code, we ask Metro to include a maximum length and width in your pile size limit.

License Term: Although the transition to ASP composting may take 18 months, the proposed license term is 5 years. Unless Metro is willing to shorten the term of the license to match the length of the transition period, we request that Metro put a condition into the license that will require an impact study to be performed after the facility has completed the transition to ASP composting.

Offsite Dust: The dust protections in the proposed license are inadequate. We request that the license require the installation of dust monitoring and sampling equipment in the surrounding neighborhoods and properties.

Offsite Odors: Considering that Metro has declined the opportunity to put any measurable odor standard in the license, we request that the license require no offsite odor. We will not tolerate nuisance odors in our homes and on our private property. Metro needs to replace the vague language of “minimize offsite odors” with an odor standard that is clear, meaningful, and measurable.

Verification: We request that the license describe the process that Metro will use to double check and confirm the veracity of all measurements taken by the operator. Self regulation is not a feasible solution when it creates a conflict of interest.

Groundwater: We demand strong protections for groundwater and stormwater. Contaminated leachate must never be discharged into our local creeks and rivers.

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

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

Transparency: We request 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: [REDACTED]@gmail.com"
Subject: RE: Form submission from: Comment on the draft license for Grimm's Fuel Company
Date: Tuesday, February 05, 2019 10:52:00 AM

Hello,

Thank you for your comment. More information about Metro's role and activities related to Grimm's Fuel Company can be found on our [website](#).

Thanks again,
*Hila

Hila Ritter
Solid Waste Authorization Coordinator
Property and Environmental Services
My gender pronouns: she, her, hers.
Metro | oregonmetro.gov
600 NE Grand Ave.
Portland, OR 97232-2736
503-797-1862

From: Website feedback form [mailto:[REDACTED]@oregonmetro.gov]
Sent: Monday, February 04, 2019 8:51 PM
To: Metro Solid Waste Compliance <[REDACTED]@oregonmetro.gov>
Subject: Form submission from: Comment on the draft license for Grimm's Fuel Company

Submitted on Monday, February 4, 2019 - 8:50pm

First name: Andy
Last name: Wilson
Email: [REDACTED]@gmail.com
Zip code: 97062

Do you support Metro issuing this license as written? No

Please explain:

The license, as written, does not have adequate community reporting, feedback, and measurement techniques. The residents surrounding Grimm's deserve a fair process, administered by Metro. In addition, the amount of land usable by Grimm's must be consistent across all the agencies in the licensing process.

Do you have a concern that's not addressed in this license? Yes

Please explain: Community reporting is critical to accurately measure the effectiveness of the license conditions. The complaint form on the website is not customer friendly. A process that gathers sufficient information to identify the problem and with robust follow-up with the complainant will increase accuracy, and while being equally useful for Grimm's business

operation.

Do you have additional input or specific changes to suggest relating to the draft license? Yes
Please explain: Tracking odor complaints is not an easily measureable process. Investing in measurement devices that are of modest cost but provide verifiable results would increase the confidence of Grimm's operational procedures and community trust in Metro.

From: [Metro Solid Waste Compliance](#)
To: [REDACTED]@gmail.com"
Subject: RE: Form submission from: Comment on the draft license for Grimm's Fuel Company
Date: Tuesday, February 05, 2019 10:41:00 AM

Hello,

Thank you for your comment. More information about Metro's role and activities related to Grimm's Fuel Company can be found on our [website](#).

Thanks again,

*Hila

Hila Ritter
Solid Waste Authorization Coordinator
Property and Environmental Services
My gender pronouns: she, her, hers.
Metro | oregonmetro.gov
600 NE Grand Ave.
Portland, OR 97232-2736
503-797-1862

From: Website feedback form [mailto:[REDACTED]@oregonmetro.gov]
Sent: Monday, February 04, 2019 7:17 PM
To: Metro Solid Waste Compliance <[REDACTED]@oregonmetro.gov>
Subject: Form submission from: Comment on the draft license for Grimm's Fuel Company

Submitted on Monday, February 4, 2019 - 7:16pm

First name: Kristen
Last name: Eisenman
Email: [REDACTED]@gmail.com
Zip code: 97062

Do you support Metro issuing this license as written? No

Please explain: See my concerns and input in your questions below.

Do you have a concern that's not addressed in this license? Yes

Please explain:

The proposed license does not adequately address the following concerns:

Public Health, Human Health Risks, Public Safety
Leachate Contamination of Stormwater and Groundwater
Air Pollution and Air Quality Monitoring
Particulates, Bioaerosols, Odorous Compounds
Gasses, Air Emissions, VOC's
Air Quality and Environmental Damage

At an absolute minimum, the license should include all of the performance goals stipulated in Chapter 5 of the Metro Code section 5.01.090(c) specifically (1) Environment (2) Health and Safety and (3) Nuisances. We are unable to find any reference to “groundwater” or “public health” in the proposed license, and we believe that this license is not in compliance with Metro Code. We ask that Metro not issue the license as currently written.

Do you have additional input or specific changes to suggest relating to the draft license? Yes
Please explain:

We appreciate the efforts that Metro has made to improve operations at Grimm’s Fuel, however, there are a number of areas where the proposed license should be improved:

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

Public Health: We have serious concerns over the potential health impacts from living downwind from this composting operation, and we request a better understanding of all the airborne emissions from the facility. We request that a 24/7 automated air quality monitoring station be setup. We have a right to know what is in the air that we are breathing. We believe that both the regulator and the operator have a moral and ethical responsibility to the community to make sure that the air around the facility is safe to breathe. We live here.

Pile Size: In consideration of the fact that Metro does not have the authority to enforce the fire code, we ask Metro to include a maximum length and width in your pile size limit.

License Term: Although the transition to ASP composting may take 18 months, the proposed license term is 5 years. Unless Metro is willing to shorten the term of the license to match the length of the transition period, we request that Metro put a condition into the license that will require an impact study to be performed after the facility has completed the transition to ASP composting.

Offsite Dust: The dust protections in the proposed license are inadequate. We request that the license require the installation of dust monitoring and sampling equipment in the surrounding neighborhoods and properties.

Offsite Odors: Considering that Metro has declined the opportunity to put any measurable odor standard in the license, we request that the license require no offsite odor. We will not tolerate nuisance odors in our homes and on our private property. Metro needs to replace the vague language of “minimize offsite odors” with an odor standard that is clear, meaningful, and measurable.

Verification: We request that the license describe the process that Metro will use to double check and confirm the veracity of all measurements taken by the operator. Self regulation is not a feasible solution when it creates a conflict of interest.

Groundwater: We demand strong protections for groundwater and stormwater. Contaminated leachate must never be discharged into our local creeks and rivers.

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

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

Transparency: We request 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: [Hila Ritter](#)
To: [REDACTED]@yahoo.com"
Subject: RE: Form submission from: Comment on the draft license for Grimm's Fuel Company
Date: Wednesday, January 09, 2019 11:17:00 AM

Hello,

Thank you for your comment. More information about Metro's role and activities related to Grimm's Fuel Company can be found on our [website](#).

Thanks again,
*Hila

Hila Ritter
Solid Waste Authorization Coordinator
Property and Environmental Services
My gender pronouns: she, her, hers.
Metro | oregonmetro.gov
600 NE Grand Ave.
Portland, OR 97232-2736
503-797-1862

From: Website feedback form [[mailto:\[REDACTED\]@oregonmetro.gov](mailto:[REDACTED]@oregonmetro.gov)]
Sent: Tuesday, January 08, 2019 6:37 PM
To: Metro Solid Waste Compliance <[\[REDACTED\]@oregonmetro.gov](mailto:[REDACTED]@oregonmetro.gov)>
Subject: Form submission from: Comment on the draft license for Grimm's Fuel Company

Submitted on Tuesday, January 8, 2019 - 6:36pm

First name: Armando
Last name: Sanchez
Email: [REDACTED]@yahoo.com
Zip code: 97062

Do you support Metro issuing this license as written? Yes

Please explain: Is always good to have a place where to take the yard debris this helps a lot of people ,having a place closer saved time and gas so that is money!

Do you have a concern that's not addressed in this license? No preference

Please explain:

Do you have additional input or specific changes to suggest relating to the draft license? No preference

Please explain:

From: [Metro Solid Waste Compliance](#)
To: [REDACTED]@yahoo.com"
Subject: RE: Form submission from: Comment on the draft license for Grimm's Fuel Company
Date: Tuesday, February 05, 2019 10:35:00 AM

Hello,

Thank you for your comment. More information about Metro's role and activities related to Grimm's Fuel Company can be found on our [website](#).

Thanks again,
*Hila

Hila Ritter
Solid Waste Authorization Coordinator
Property and Environmental Services
My gender pronouns: she, her, hers.
Metro | oregonmetro.gov
600 NE Grand Ave.
Portland, OR 97232-2736
503-797-1862

From: Website feedback form [mailto:[REDACTED]@oregonmetro.gov]
Sent: Friday, February 01, 2019 6:27 PM
To: Metro Solid Waste Compliance <[REDACTED]@oregonmetro.gov>
Subject: Form submission from: Comment on the draft license for Grimm's Fuel Company

Submitted on Friday, February 1, 2019 - 6:27pm

First name: Debra
Last name: Crawford
Email: [REDACTED]@yahoo.com
Zip code: 97224

Do you support Metro issuing this license as written? No

Please explain: Issues left unresolved. Air Pollution and Odor Emissions, Contaminated Leachate are of the utmost importance and revisions need to be made. I wake up sick from the Grimms operation, I often did not realize why until I would go outside and smell that smell.

It's causing me many health issues as it is with many others in this community of seniors

Do you have a concern that's not addressed in this license? Yes

Please explain: If the license is passed as is I feel the quality of my life will continue to be affected in a negative way. Public health and air quality will not be reduced.

Do you have additional input or specific changes to suggest relating to the draft license? Yes

Please explain: At an absolute minimum, the license should include all of the performance goals stipulated in Chapter 5 of the Metro Code section 5.01.090(c) specifically (1)

Environment (2) Health and Safety and (3) Nuisances. We are unable to find any reference to “groundwater” or “public health” in the proposed license, and we believe that this license is not in compliance with Metro Code. We ask that Metro not issue the license as currently written.

From: [Metro Solid Waste Compliance](#)
To: [REDACTED]@yahoo.com"
Subject: RE: Form submission from: Comment on the draft license for Grimm's Fuel Company
Date: Tuesday, February 05, 2019 10:47:00 AM

Hello,

Thank you for your comment. More information about Metro's role and activities related to Grimm's Fuel Company can be found on our [website](#).

Thanks again,
*Hila

Hila Ritter
Solid Waste Authorization Coordinator
Property and Environmental Services
My gender pronouns: she, her, hers.
Metro | oregonmetro.gov
600 NE Grand Ave.
Portland, OR 97232-2736
503-797-1862

From: Website feedback form [mailto:[REDACTED]@oregonmetro.gov]
Sent: Monday, February 04, 2019 9:24 PM
To: Metro Solid Waste Compliance <[REDACTED]@oregonmetro.gov>
Subject: Form submission from: Comment on the draft license for Grimm's Fuel Company

Submitted on Monday, February 4, 2019 - 9:24pm

First name: Brian
Last name: Craker
Email: [REDACTED]@yahoo.com
Zip code: 97062

Do you support Metro issuing this license as written? No

Please explain:

Do you have a concern that's not addressed in this license? Yes

Please explain:

The proposed license does not adequately address the following concerns:

Public Health, Human Health Risks, Public Safety
Leachate Contamination of Stormwater and Groundwater
Air Pollution and Air Quality Monitoring
Particulates, Bioaerosols, Odorous Compounds
Gasses, Air Emissions, VOC's
Air Quality and Environmental Damage

At an absolute minimum, the license should include all of the performance goals stipulated in Chapter 5 of the Metro Code section 5.01.090(c) specifically (1) Environment (2) Health and Safety and (3) Nuisances. We are unable to find any reference to “groundwater” or “public health” in the proposed license, and we believe that this license is not in compliance with Metro Code. We ask that Metro not issue the license as currently written.

Do you have additional input or specific changes to suggest relating to the draft license? Yes Please explain:

We appreciate the efforts that Metro has made to improve operations at Grimm’s Fuel, however, there are a number of areas where the proposed license should be improved:

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

Public Health: We have serious concerns over the potential health impacts from living downwind from this composting operation, and we request a better understanding of all the airborne emissions from the facility. We request that a 24/7 automated air quality monitoring station be setup. We have a right to know what is in the air that we are breathing. We believe that both the regulator and the operator have a moral and ethical responsibility to the community to make sure that the air around the facility is safe to breathe. We live here.

Pile Size: In consideration of the fact that Metro does not have the authority to enforce the fire code, we ask Metro to include a maximum length and width in your pile size limit.

License Term: Although the transition to ASP composting may take 18 months, the proposed license term is 5 years. Unless Metro is willing to shorten the term of the license to match the length of the transition period, we request that Metro put a condition into the license that will require an impact study to be performed after the facility has completed the transition to ASP composting.

Offsite Dust: The dust protections in the proposed license are inadequate. We request that the license require the installation of dust monitoring and sampling equipment in the surrounding neighborhoods and properties.

Offsite Odors: Considering that Metro has declined the opportunity to put any measurable odor standard in the license, we request that the license require no offsite odor. We will not tolerate nuisance odors in our homes and on our private property. Metro needs to replace the vague language of “minimize offsite odors” with an odor standard that is clear, meaningful, and measurable.

Verification: We request that the license describe the process that Metro will use to double check and confirm the veracity of all measurements taken by the operator. Self regulation is not a feasible solution when it creates a conflict of interest.

Groundwater: We demand strong protections for groundwater and stormwater. Contaminated leachate must never be discharged into our local creeks and rivers.

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

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

Transparency: We request 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: [REDACTED]@yahoo.com"
Subject: RE: Form submission from: Comment on the draft license for Grimm's Fuel Company
Date: Tuesday, January 15, 2019 4:16:00 PM

Hello,

Thank you for your comment. More information about Metro's role and activities related to Grimm's Fuel Company can be found on our [website](#).

Thanks again,

*Hila

Hila Ritter
Solid Waste Authorization Coordinator
Property and Environmental Services
My gender pronouns: she, her, hers.
Metro | oregonmetro.gov
600 NE Grand Ave.
Portland, OR 97232-2736
503-797-1862

From: Website feedback form [mailto:[REDACTED]@oregonmetro.gov]
Sent: Tuesday, January 15, 2019 11:04 AM
To: Metro Solid Waste Compliance <[REDACTED]@oregonmetro.gov>
Subject: Form submission from: Comment on the draft license for Grimm's Fuel Company

Submitted on Tuesday, January 15, 2019 - 11:04am

First name: Bryre
Last name: Lowe
Email: [REDACTED]@yahoo.com
Zip code: 97140

Do you support Metro issuing this license as written? No preference

Please explain: I'm not quite sure that this license changes ANYTHING regarding the odor??? I've lived here for 15 years and the odor has seemed to have gotten worse the last 3 years??? I want to know why??? Are there harmful chemicals being used that produce such an abhorrent odor?? How is it affecting our health and well being, aside from the smell? We, as constituents, need to be made aware...show us the "science" and allow us to vote...

Do you have a concern that's not addressed in this license? No preference

Please explain:

Do you have additional input or specific changes to suggest relating to the draft license? No preference

Please explain:

From: [Metro Solid Waste Compliance](#)
To: [REDACTED]@gmail.com"
Subject: RE: Form submission from: Comment on the draft license for Grimm's Fuel Company
Date: Tuesday, February 05, 2019 10:40:00 AM

Hello,

Thank you for your comment. More information about Metro's role and activities related to Grimm's Fuel Company can be found on our [website](#).

Thanks again,

*Hila

Hila Ritter
Solid Waste Authorization Coordinator
Property and Environmental Services
My gender pronouns: she, her, hers.
Metro | oregonmetro.gov
600 NE Grand Ave.
Portland, OR 97232-2736
503-797-1862

From: Website feedback form [mailto:[REDACTED]@oregonmetro.gov]
Sent: Monday, February 04, 2019 11:28 AM
To: Metro Solid Waste Compliance <[REDACTED]@oregonmetro.gov>
Subject: Form submission from: Comment on the draft license for Grimm's Fuel Company

First name: Chris
Last name: Krivens
Email: [REDACTED]@gmail.com
Zip code: 97062
Do you support Metro issuing this license as written? No
Please explain: See below
Do you have a concern that's not addressed in this license? Yes
Please explain: See below
Do you have additional input or specific changes to suggest relating to the draft license? Yes
Please explain:
I support exactly what oregonair suggests, as follows:

The proposed license does not adequately address the following concerns:

Public Health, Human Health Risks, Public Safety
Leachate Contamination of Stormwater and Groundwater
Air Pollution and Air Quality Monitoring
Particulates, Bioaerosols, Odorous Compounds
Gasses, Air Emissions, VOC's

Air Quality and Environmental Damage

At an absolute minimum, the license should include all of the performance goals stipulated in Chapter 5 of the Metro Code section 5.01.090(c) specifically (1) Environment (2) Health and Safety and (3) Nuisances. We are unable to find any reference to “groundwater” or “public health” in the proposed license, and we believe that this license is not in compliance with Metro Code. We ask that Metro not issue the license as currently written.

Additional input or specific license changes to suggest:

We appreciate the efforts that Metro has made to improve operations at Grimm’s Fuel, however, there are a number of areas where the proposed license should be improved:

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

Public Health: We have serious concerns over the potential health impacts from living downwind from this composting operation, and we request a better understanding of all the airborne emissions from the facility. We request that a 24/7 automated air quality monitoring station be setup. We have a right to know what is in the air that we are breathing. We believe that both the regulator and the operator have a moral and ethical responsibility to the community to make sure that the air around the facility is safe to breathe. We live here.

Pile Size: In consideration of the fact that Metro does not have the authority to enforce the fire code, we ask Metro to include a maximum length and width in your pile size limit.

License Term: Although the transition to ASP composting may take 18 months, the proposed license term is 5 years. Unless Metro is willing to shorten the term of the license to match the length of the transition period, we request that Metro put a condition into the license that will require an impact study to be performed after the facility has completed the transition to ASP composting.

Offsite Dust: The dust protections in the proposed license are inadequate. We request that the license require the installation of dust monitoring and sampling equipment in the surrounding neighborhoods and properties.

Offsite Odors: Considering that Metro has declined the opportunity to put any measurable odor standard in the license, we request that the license require no offsite odor. We will not tolerate nuisance odors in our homes and on our private property. Metro needs to replace the vague language of “minimize offsite odors” with an odor standard that is clear, meaningful, and measurable.

Verification: We request that the license describe the process that Metro will use to double check and confirm the veracity of all measurements taken by the operator. Self regulation is not a feasible solution when it creates a conflict of interest.

Groundwater: We demand strong protections for groundwater and stormwater. Contaminated leachate must never be discharged into our local creeks and rivers.

Flow Rate: Considering that air flow is crucial to maintaining proper temperature and oxygen levels in the active piles, we request that the license require the operator to monitor, track, and

record the air flow rate and pressure drop on all air blowers at the facility.

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

Transparency: We request 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: ["Yahoo"](#)
Subject: RE: Grimes Fuel
Date: Tuesday, February 05, 2019 10:35:00 AM

Hello,

Thank you for your comment. More information about Metro's role and activities related to Grimm's Fuel Company can be found on our [website](#).

Thanks again,
*Hila

Hila Ritter
Solid Waste Authorization Coordinator
Property and Environmental Services
My gender pronouns: she, her, hers.
Metro | oregonmetro.gov
600 NE Grand Ave.
Portland, OR 97232-2736
503-797-1862

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

From: Yahoo [mailto:[\[REDACTED\]@yahoo.com](#)]
Sent: Friday, February 01, 2019 6:26 PM
To: Metro Solid Waste Compliance <[\[REDACTED\]@oregonmetro.gov](#)>
Subject: Grimes Fuel

I feel that the license by Metro is good as it stands. They have been there far longer than those who are complaining and demanding change. The smell is not all of the time and it is not debilitating. It is unreasonable for those people to make the demands that they are. They won't help foot the cost for change and Grimms has been there far longer than they have. They need to develop tolerance or move. Should have lived with the dog food plant smell. Please don't make it impossible for Grimm's to do business. The complainers need to grow up. Leave Grimms alone.
Sent from my iPhone

From: [Hila Ritter](#)
To: ["LFBE \(Leif Bruce\)"](#)
Subject: RE: Grimm's Fuel
Date: Tuesday, January 08, 2019 4:57:00 PM

Hello,

Thank you for your comment. More information about Metro's role and activities related to Grimm's Fuel Company can be found on our [website](#). I hope this information is helpful to you. I will add your email to the distribution list that Metro has been compiling.

Thanks,
*Hila

Hila Ritter
Solid Waste Authorization Coordinator
Property and Environmental Services
My gender pronouns: she, her, hers.
Metro | oregonmetro.gov
600 NE Grand Ave.
Portland, OR 97232-2736
503-797-1862

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

From: LFBE (Leif Bruce) [mailto:████████@novonordisk.com]
Sent: Saturday, January 05, 2019 7:36 PM
To: Hila Ritter <Hila.████████@oregonmetro.gov>
Subject: Grimm's Fuel

Hila-

We lived in Tigard, on Bull Mountain for over 12 years, moved away for 2017 and back again in 2018. During our hiatus something has changed with the odor emanating from Grimm's.

During our first 12 years it was noticeable only on occasion, but upon our return the smell has been horrible for more than 15 days our our first 4 months in the neighborhood. Because the smell was so irregular before, I never knew where it was coming from. Because of its increased frequency I starting paying attention more closely. It was only tonight that I came across the public document that shared all the public comment and thought I should add my comment as well.

The odor NEEDS to be addressed!

The only reason that more neighbors don't comment and that I haven't commented sooner is that 1) the source wasn't clear 2) the process to complain is not obvious. Please make a greater effort to communicate these things to the neighboring communities.

Regards,

Leif Bruce

Sent from my iPad

From: [Duane Altig](#)
To: [Julie](#); [Jeff Grimm](#)
Cc: [REDACTED] [simple.be](#); [REDACTED] [hotmail.com](#); [Hila Ritter](#); [Eric Crandall](#); [FLEMING Jeremy](#)
Subject: RE: Grimm's Stench - Four Reports
Date: Tuesday, January 22, 2019 6:24:50 AM

Julie thank you for your report(s) and they will be recorded
Thanks again

Duane Altig
Facility Inspector
Solid Waste Information, Compliance & Cleanup
Metro / [oregonmetro.gov](#)
503-797-1694
Fax: 503-813-7544
duane [REDACTED] [oregonmetro.gov](#)

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

From: Julie [[mailto:\[REDACTED\]@frontier.com](#)]
Sent: Tuesday, January 22, 2019 6:22 AM
To: [REDACTED] [simple.be](#); Hila Ritter; Duane Altig; [REDACTED] [hotmail.com](#)
Subject: Grimm's Stench - Four Reports

Hi Duane and Hila,

At Pony Ridge the stench was terrible on:

1. Saturday, 1-19-19 at 11:30 a.m.
2. Saturday, 1-19-19 at 5:30 p m.
3. Monday, 1-21-19 all afternoon
4. Monday, 1-21-19 at 9:00 p m. the stench was still terrible.

There is no way to get rid of this rotten stench unless all of the piles are loaded into dump trucks, train cars, or semi trucks and hauled away to eastern Oregon and spread in the high desert somewhere away from humans and animals. The compost has been allowed to become so rotten that it appears poisonous in my opinion.

Please add this to the public comments.

Julie

From: [Hila Ritter](#)
To: [REDACTED]@frontier.com"
Cc: [Duane Altig](#); [Eric Crandall](#)
Subject: RE: Grimm's Stench - Three Reports
Date: Friday, February 01, 2019 12:40:00 PM

Julie,

Just want to add that this will be recorded as a formal comment as well per your request.

Thanks,
*Hila

Hila Ritter
Solid Waste Authorization Coordinator
Property and Environmental Services
My gender pronouns: she, her, hers.
Metro | oregonmetro.gov
600 NE Grand Ave.
Portland, OR 97232-2736
503-797-1862

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

From: Duane Altig
Sent: Friday, February 01, 2019 7:49 AM
To: Julie <[REDACTED]@frontier.com>; Jeff Grimm <[REDACTED]@teleport.com>
Cc: [REDACTED]@simple.be; Hila Ritter <Hila.[REDACTED]@oregonmetro.gov>; [REDACTED]@hotmail.com; Jeremy Fleming <jeremy.[REDACTED]@state.or.us>; Eric Crandall <Eric.[REDACTED]@oregonmetro.gov>
Subject: RE: Grimm's Stench - Three Reports

Julie - Thank you for the reports and they will be recorded.
Thanks

Duane Altig
Facility Inspector
Solid Waste Information, Compliance & Cleanup Metro / oregonmetro.gov
503-797-1694
Fax: 503-813-7544
duane.[REDACTED]@oregonmetro.gov

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

From: Julie [[mailto:\[REDACTED\]@frontier.com](mailto:[REDACTED]@frontier.com)]
Sent: Thursday, January 31, 2019 4:40 PM
To: [REDACTED]@simple.be; Hila Ritter; Duane Altig; [REDACTED]@hotmail.com
Subject: Grimm's Stench - Three Reports

Hi,

1. Currently (1-31-19) and for the past hour the stench is absolutely horrific!
2. Saturday afternoon (1-26-19) the stench was terrible from 1:00 p.m. and throughout the afternoon.
3. Friday morning (1-25-19) the stench was terrible and I suspect it lasted most of the day.

Truly, absolutely ALL of this rotten, poisonous, particle ridden dusty compost should be removed from the premises and hauled far away (in dump trucks, semi-trucks, or in railroad cars) to eastern Oregon and spread thinly in the desert. It's obvious that NO pile height is acceptable because this compost is rotten!

Please add this to the public comments that are due next Tuesday.

Julie

From: [Hila Ritter](#)
To: "Julie"
Cc: [Duane Altig](#); [Eric Crandall](#); [REDACTED]@hotmail.com; [REDACTED]@simple.be
Subject: RE: Grimm's Stench - Three Reports
Date: Tuesday, February 05, 2019 1:04:00 PM

Hello,

Just confirming that this will be added to the public comments as well.

Thanks,
*Hila

Hila Ritter
Solid Waste Authorization Coordinator
Property and Environmental Services
My gender pronouns: she, her, hers.
Metro | oregonmetro.gov
600 NE Grand Ave.
Portland, OR 97232-2736
503-797-1862

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

From: Julie [[mailto:\[REDACTED\]@frontier.com](mailto:[REDACTED]@frontier.com)]
Sent: Friday, February 01, 2019 6:31 PM
To: Hila Ritter <[Hila\[REDACTED\]@oregonmetro.gov](mailto:Hila[REDACTED]@oregonmetro.gov)>
Cc: Duane Altig <[Duane\[REDACTED\]@oregonmetro.gov](mailto:Duane[REDACTED]@oregonmetro.gov)>; Eric Crandall <[Eric\[REDACTED\]@oregonmetro.gov](mailto:Eric[REDACTED]@oregonmetro.gov)>; [REDACTED]@hotmail.com; [REDACTED]@simple.be
Subject: Re: Grimm's Stench - Three Reports

Yes Hila, as per my request, indeed please record it. Should I be extra concerned in some way that my "public comments" are available publicly? Should we be afraid to voice our concerns?

I am a seriously concerned citizen whose quality of life (and that of several hundred other local residents) is being compromised by the operating procedures of a composting facility. Our quality of life is also being compromised by the lack of the governing agencies to properly issue, regulate and enforce a license that takes all parties into consideration.

Please add the above also to the public comments that are due on Tuesday, February 5th.

Julie

> On Feb 1, 2019, at 12:42 PM, Hila Ritter <[Hila\[REDACTED\]@oregonmetro.gov](mailto:Hila[REDACTED]@oregonmetro.gov)> wrote:
>
> Julie,
>
> Just want to add that this will be recorded as a formal comment as well per your request.
>
> Thanks,
> *Hila
>
> Hila Ritter
> Solid Waste Authorization Coordinator

> Property and Environmental Services
> My gender pronouns: she, her, hers.
> Metro | oregonmetro.gov
> 600 NE Grand Ave.
> Portland, OR 97232-2736
> 503-797-1862

>

>

> -----Original Message-----

> From: Duane Altig
> Sent: Friday, February 01, 2019 7:49 AM
> To: Julie <[REDACTED]@frontier.com>; Jeff Grimm <[REDACTED]@teleport.com>
> Cc: [REDACTED]@simple.be; Hila Ritter <Hila.[REDACTED]@oregonmetro.gov>; [REDACTED]@hotmail.com; Jeremy Fleming
> <jeremy.[REDACTED]@state.or.us>; Eric Crandall <Eric.[REDACTED]@oregonmetro.gov>
> Subject: RE: Grimm's Stench - Three Reports

>

> Julie - Thank you for the reports and they will be recorded.

> Thanks

>

> Duane Altig
> Facility Inspector
> Solid Waste Information, Compliance & Cleanup Metro / oregonmetro.gov
> 503-797-1694
> Fax: 503-813-7544
> duane.[REDACTED]@oregonmetro.gov

>

>

> -----Original Message-----

> From: Julie [[mailto:\[REDACTED\]@frontier.com](mailto:[REDACTED]@frontier.com)]
> Sent: Thursday, January 31, 2019 4:40 PM
> To: [REDACTED]@simple.be; Hila Ritter; Duane Altig; [REDACTED]@hotmail.com
> Subject: Grimm's Stench - Three Reports

>

> Hi,

>

> 1. Currently (1-31-19) and for the past hour the stench is absolutely horrific!

>

> 2. Saturday afternoon (1-26-19) the stench was terrible from 1:00 p.m. and throughout the afternoon.

>

> 3. Friday morning (1-25-19) the stench was terrible and I suspect it lasted most of the day.

>

> Truly, absolutely ALL of this rotten, poisonous, particle ridden dusty compost should be removed from the premises and hauled far away (in dump trucks, semi-trucks, or in railroad cars) to eastern Oregon and spread thinly in the desert. It's obvious that NO pile height is acceptable because this compost is rotten!

>

> Please add this to the public comments that are due next Tuesday.

>

> Julie

From: [Hila Ritter](#)
To: "[REDACTED]@frontier.com"
Cc: [Duane Altig](#)
Subject: RE: Grimm's Stench - Three Reports
Date: Tuesday, February 05, 2019 3:43:00 PM
Attachments: [FW Grimms Stench 8-22-18 Continued](#)[Grimms Stench 8-23-18.msg](#)

Julie,

It is not our practice to formally respond to comments during the open comment period. In regards to your safety, I have attached the email conversation between you and Duane last year when you initially expressed your safety concerns to Metro. I will reiterate that if you feel unsafe that you should contact your local police department and report it.

Thank you for the comment, it will be recorded.

Thanks,
*Hila

Hila Ritter

Solid Waste Authorization Coordinator
Property and Environmental Services

My gender pronouns: she, her, hers.

Metro | oregonmetro.gov
600 NE Grand Ave.
Portland, OR 97232-2736
503-797-1862

From: [REDACTED]@frontier.com [mailto:[REDACTED]@frontier.com]
Sent: Tuesday, February 05, 2019 1:05 PM
To: Hila Ritter <Hila [REDACTED]@oregonmetro.gov>
Cc: Duane Altig <Duane [REDACTED]@oregonmetro.gov>; Eric Crandall <Eric [REDACTED]@oregonmetro.gov>; [REDACTED]@hotmail.com; [REDACTED]@simple.be; Metro Solid Waste Compliance <[REDACTED]@oregonmetro.gov>
Subject: Re: Grimm's Stench - Three Reports

Hello Hila,

Your silence in regards to my question of safety in reporting speaks volumes. I will consider that a yes - that my concern should be heightened because I am an active malodor reporter.

If you recall sometime last fall when the odor was very horrid in the early morning hours, I sent in a report. When Mr. Grimm responded, he essentially denied that the odor existed because he or an employee drove through the neighborhood three times

and didn't smell anything that same morning. Well that completely smacks of the old saying, "That's like the fox guarding the chicken coop."

I responded by saying I would no longer report because I felt it wasn't safe. I stopped reporting for quite some time. Now, here we are again. Please add this to the public comments before 5:00 p.m. today.

Seriously,
Julie Neumann

On Tuesday, February 5, 2019, 10:37:14 AM PST, Hila Ritter <[Hila \[REDACTED\]@oregonmetro.gov](mailto:Hila[REDACTED]@oregonmetro.gov)> wrote:

Hello,

Thank you for your comment. More information about Metro's role and activities related to Grimm's Fuel Company can be found on our [website](#).

Thanks again,

*Hila

Hila Ritter

Solid Waste Authorization Coordinator

Property and Environmental Services

My gender pronouns: she, her, hers.

Metro | oregonmetro.gov

600 NE Grand Ave.

Portland, OR 97232-2736

503-797-1862

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

From: Julie [[mailto:\[REDACTED\]@frontier.com](mailto:[REDACTED]@frontier.com)]

Sent: Friday, February 01, 2019 6:31 PM

To: Hila Ritter <[Hila\[REDACTED\]@oregonmetro.gov](mailto:Hila[REDACTED]@oregonmetro.gov)>
Cc: Duane Altig <[Duane\[REDACTED\]@oregonmetro.gov](mailto:Duane[REDACTED]@oregonmetro.gov)>; Eric Crandall <[Eric\[REDACTED\]@oregonmetro.gov](mailto:Eric[REDACTED]@oregonmetro.gov)>;
[\[REDACTED\]@hotmail.com](mailto:[REDACTED]@hotmail.com); [\[REDACTED\]@simple.be](mailto:[REDACTED]@simple.be)
Subject: Re: Grimm's Stench - Three Reports

Yes Hila, as per my request, indeed please record it. Should I be extra concerned in some way that my "public comments" are available publicly? Should we be afraid to voice our concerns?

I am a seriously concerned citizen whose quality of life (and that of several hundred other local residents) is being compromised by the operating procedures of a composting facility. Our quality of life is also being compromised by the lack of the governing agencies to properly issue, regulate and enforce a license that takes all parties into consideration.

Please add the above also to the public comments that are due on Tuesday, February 5th.

Julie

> On Feb 1, 2019, at 12:42 PM, Hila Ritter <[Hila\[REDACTED\]@oregonmetro.gov](mailto:Hila[REDACTED]@oregonmetro.gov)> wrote:

>

> Julie,

>

> Just want to add that this will be recorded as a formal comment as well per your request.

>

> Thanks,

> *Hila

>

> Hila Ritter

> Solid Waste Authorization Coordinator

> Property and Environmental Services

> My gender pronouns: she, her, hers.

> Metro | oregonmetro.gov

> 600 NE Grand Ave.

> Portland, OR 97232-2736

> 503-797-1862

>

>

> -----Original Message-----

> From: Duane Altig

> Sent: Friday, February 01, 2019 7:49 AM

> To: Julie <[REDACTED]@frontier.com>; Jeff Grimm <[REDACTED]@teleport.com>

> Cc: [REDACTED]@simple.be; Hila Ritter <Hila.[REDACTED]@oregonmetro.gov>; [REDACTED]@hotmail.com; Jeremy Fleming <jeremy.[REDACTED]@state.or.us>; Eric Crandall <Eric.[REDACTED]@oregonmetro.gov>

> Subject: RE: Grimm's Stench - Three Reports

>

> Julie - Thank you for the reports and they will be recorded.

> Thanks

>

> Duane Altig

> Facility Inspector

> Solid Waste Information, Compliance & Cleanup Metro / oregonmetro.gov

> 503-797-1694

> Fax: 503-813-7544

> [duane.\[REDACTED\]@oregonmetro.gov](mailto:duane.[REDACTED]@oregonmetro.gov)

>

>

> -----Original Message-----

> From: Julie [[mailto:\[REDACTED\]@frontier.com](mailto:[REDACTED]@frontier.com)]

> Sent: Thursday, January 31, 2019 4:40 PM

> To: [REDACTED]@simple.be; Hila Ritter; Duane Altig; [REDACTED]@hotmail.com

> Subject: Grimm's Stench - Three Reports

>

> Hi,

>

> 1. Currently (1-31-19) and for the past hour the stench is absolutely horrific!

>

> 2. Saturday afternoon (1-26-19) the stench was terrible from 1:00 p.m. and throughout the afternoon.

>

> 3. Friday morning (1-25-19) the stench was terrible and I suspect it lasted most of the day.

>

> Truly, absolutely ALL of this rotten, poisonous, particle ridden dusty compost should be removed from the premises and hauled far away (in dump trucks, semi-trucks, or in railroad cars) to eastern Oregon and spread thinly in the desert. It's obvious that NO pile height is acceptable because this compost is rotten!

>

> Please add this to the public comments that are due next Tuesday.

>

> Julie

From: [Metro Solid Waste Compliance](#)
To: "R B"
Subject: RE: Grimms
Date: Friday, February 01, 2019 1:15:00 PM

Hello,

Thank you for your comment. More information about Metro's role and activities related to Grimm's Fuel Company can be found on our [website](#).

Thanks again,
*Hila

Hila Ritter
Solid Waste Authorization Coordinator
Property and Environmental Services
My gender pronouns: she, her, hers.
Metro | oregonmetro.gov
600 NE Grand Ave.
Portland, OR 97232-2736
503-797-1862

From: R B [mailto: [REDACTED]@outlook.com]
Sent: Thursday, January 31, 2019 6:02 PM
To: Metro Solid Waste Compliance < [REDACTED]@oregonmetro.gov >
Subject: Grimms

The Clean Air Safe Environment (CASE) Board has identified the following issues and amendments regarding the final Metro's proposed license for Grimms.

Identified issues:

Section 1.8: Facility legal description (page 3 of 22) includes five tax lots owned by Grimms. Composting is only permitted on tax lots 1800 and 1900 by the City of Tualatin conditional land use permit (CUP). Tax Lots other than 1800 and 1900 should be deleted from draft license.

Section 6: A third party qualified technician should be assigned to test and record accurate measures of oxygen, temperature, moisture, etc.

Section 7.16, Include: odor complaints received by Metro, to automatically be routed to DEQ, City of Tualatin and Grimm's.

Thank you,

Rocky Bixby
Pony ridge Neighborhood

From: [Metro Solid Waste Compliance](#)
To: ["Jim"](#)
Subject: RE: Grimms comments
Date: Tuesday, February 05, 2019 10:39:00 AM

Hello,

Thank you for your comment. More information about Metro's role and activities related to Grimm's Fuel Company can be found on our [website](#).

Thanks again,
*Hila

Hila Ritter
Solid Waste Authorization Coordinator
Property and Environmental Services
My gender pronouns: she, her, hers.
Metro | oregonmetro.gov
600 NE Grand Ave.
Portland, OR 97232-2736
503-797-1862

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

From: Jim [mailto:[\[REDACTED\]](#)frontier.com]
Sent: Saturday, February 02, 2019 6:37 PM
To: Metro Solid Waste Compliance <[\[REDACTED\]](#)oregonmetro.gov>
Subject: Grimms comments

There is a group pushing an agenda and unsubstantiated claims regarding Grimms Fuel and the yard debris business. I commented previously, read the materials, and appreciate the extension on the matter.

The "data" is not, by any stretch, aligned with verified scientific methodologies nor conclusive. This issue is being pushed by extremely subjective information. Metro should not make judgements that do not have a preponderance of objective findings.

My wife has lived in Tualatin for 61 years and Me 32. We have a 2/3 acre garden and drop and purchase from Grimms several times a year and at all times of year. Even on site on a hot August day it is not more than a good compost smell. The place existed long before the development of Tualatin. They are a great service to the area. No one should be able to gang up on a long established business because they have a preference to live in some sanitized urban utopia. Metro should not offer a bully pulpit nor act as an agent for any group.

This is regulation gone over the top and I am the Chief Building Official of a large County, my staff knows to be reasonable in code application; Metro should be reasonable not reactive and especially not over reach. metro should have regulated the amount of development around Grimms not

regulate Grimms after allowing such density so close. Grimms should be allowed all the leniency under the regulations to do only the least modifications required under the law and as proven by solid and verified science. I would encourage Grimms to fight any ill conceived hobby science to be applied to this decision.

Jim and Karen Muir 9850 SW Avery St Tualatin 503-████-1871 ██████████ fontier.com

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

From: [Hila Ritter](#)
To: ["Jeff Grimm"](#)
Subject: RE: Grimm's Comments on L-043-19 DRAFT License
Date: Wednesday, February 06, 2019 2:16:00 PM
Attachments: [image001.png](#)

Hello,

Thank you for your comment. More information about Metro's role and activities related to Grimm's Fuel Company can be found on our [website](#).

Thanks again,
*Hila

Hila Ritter
Solid Waste Authorization Coordinator
Property and Environmental Services
My gender pronouns: she, her, hers.
Metro | oregonmetro.gov
600 NE Grand Ave.
Portland, OR 97232-2736
503-797-1862

From: Jeff Grimm [mailto:████████@teleport.com]
Sent: Tuesday, February 05, 2019 4:23 PM
To: Hila Ritter <Hila.████████@oregonmetro.gov>
Subject: Grimm's Comments on L-043-19 DRAFT License

Hila,

Our comments regarding the proposed license are below. Thanks again for all of your work on this issue. Your time and efforts are greatly appreciated.

[Grimm's Comments on L-043-19 DRAFT License](#)

[Page1: Property Owner: Grimm Brothers, LLC.](#)

[Page 3, 1.0: Property Owner: Grimm Brothers, LLC.](#)

[Page 8, 5.6: revise "... and which prevents its migration beyond property boundaries." To: "... and which minimizes its migration beyond property boundaries." We cannot be held to a standard where we are held responsible for any dust blowing near or across our site from any other location \(78.8 acres active farmland directly to the west of Pony Ridge, 2,000 ft Hwy 99 frontage, International Line Builders 1,750 ft to the south has a fully unpaved yard, 436 acres](#)

active farmland south of Hwy 99 bounded by Cipole/Galbreath/Langer Farms, Tigard Sand and Gravel 1.8 miles to the southwest). Paragraph 2(c) is a standard we can meet.

Page 11, 6.1: Grimm's will be using dual composting methods (ASP and semi-static) until the facility is fully converted, the license must acknowledge this and our operating plan will detail each method.

Page 11, 6.2(1): Revise to read "By April 30, 2019, material stockpiles must comply with all applicable Oregon Fire Code and applicable local requirements including, but not limited to, site access and pile size requirements." As noted in the GMT report, "...the finished product piles were not a major contributor to the off-site odors" (pg 16). Due to the seasonal nature of compost use and low fire and odor potential of mature finished compost, should we be required to request a waiver from TVF&R on pile restrictions, we do not want to be negotiating with Metro and DEQ as well. This request does nothing to say we will not adhere to the existing requirement, just that we wish to deal with the principal enforcement organization.

Page 11, 6.6(1): Revise to read "The licensee must operate and maintain an aeration system that is designed to provide a minimum aeration of ten percent oxygen content to all of the ASP composting piles after the initial startup period." The compost must not be disturbed or cooled within the first 4-5 days while the bacteria multiply.

Page 12, 6.8(1): Revise to read "Describe in the operating plan how it will achieve and maintain an optimal oxygen level of ten percent or above in the ASP composting piles after the initial startup period."

Page 11, 6.7: Revise to read "The licensee must capture odors, to the greatest extent possible, at the equipment used for grinding, screening, and conveyance of materials." We will not be able to capture all vapor, odors at the plant.

Page 12, 6.9(1)(f) Carbon to Nitrogen ratio is included in the USCC STA Compost Technical Data Sheet and this parameter should be moved to 6.9(2)(g). We will of course take care to keep a C:N ration of 30-1 of all feedstocks for the composting piles.

Page 14, 7.7(a) Revise to read "Incorporate feedstocks into ASP composting piles within 24 hours of receipt or as soon as feasible;" GMT reported that "Grimm's maintains the receiving area...holding up to 2,000 cubic yards...appears to be emptied on a regular basis. Malodors & dust were not observed from this location and no recommendations for odor control appear to be needed here." The need to stockpile bulking agents directly conflicts with this requirement and 7.7(g). This 24 hour rule would effectively close the facility on the weekends restricting drop off by landscapers and the general public. The old license 5.6(1) seems perfectly adequate.

Page 17, 9.2: Revise to read “...required under Section 9.1...”

Page 18/19, 10.1: Revise to read “... in Section 10.0.”

Page 22, 14.1: Revise to read “By April 30, 2019, material stockpiles must comply with all applicable Oregon Fire Code and applicable local requirements including, but not limited to, site access and pile size requirements.” Due to the seasonal nature of compost use and low fire & odor potential of mature finished compost, should we be required to request a waiver from TVF&R on pile restrictions, we do not want to be negotiating with Metro and DEQ as well. This request does nothing to say we will not adhere to the existing requirement just that we wish to deal with the principal enforcement organization.

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



From: [Metro Solid Waste Compliance](#)
To: ["Kimberly Beck"](#)
Subject: RE: Grimm's Fuel - comment
Date: Tuesday, February 05, 2019 10:41:00 AM

Hello,

Thank you for your comment. More information about Metro's role and activities related to Grimm's Fuel Company can be found on our [website](#).

Thanks again,
*Hila

Hila Ritter
Solid Waste Authorization Coordinator
Property and Environmental Services
My gender pronouns: she, her, hers.
Metro | oregonmetro.gov
600 NE Grand Ave.
Portland, OR 97232-2736
503-797-1862

From: Kimberly Beck [mailto: [REDACTED]@comcast.net]
Sent: Monday, February 04, 2019 5:23 PM
To: Metro Solid Waste Compliance < [REDACTED]@oregonmetro.gov >
Subject: Grimm's Fuel - comment

I have lived in the Apache Bluff area of Tualatin for over 40 years. When we moved here, there was rarely a smell in the air from Grimm's. There was no reason to complain. The last couple of years, I have noticed the odor more often and stronger than before. As an environmentalists at heart, I have to agree with Oregon Air's comments. Our air and water quality are most important for good health.

K Beck

From: [Metro Solid Waste Compliance](#)
To: ["Vicki Madden"](#)
Subject: RE: Grimm's Fuel -- proposed license
Date: Tuesday, February 05, 2019 10:36:00 AM

Hello,

Thank you for your comment. More information about Metro's role and activities related to Grimm's Fuel Company can be found on our [website](#).

Thanks again,

*Hila

Hila Ritter
Solid Waste Authorization Coordinator
Property and Environmental Services
My gender pronouns: she, her, hers.
Metro | oregonmetro.gov
600 NE Grand Ave.
Portland, OR 97232-2736
503-797-1862

From: Vicki Madden [mailto:[\[REDACTED\]@gmail.com](#)]
Sent: Saturday, February 02, 2019 10:16 AM
To: Metro Solid Waste Compliance <[\[REDACTED\]@oregonmetro.gov](mailto:[REDACTED]@oregonmetro.gov)>
Subject: Grimm's Fuel -- proposed license

To Whom it May Concern,

I am writing to express my opinion that the proposed license for Grimm's Fuel should not be issued as written, and should be revised and improved to better meet the needs of the surrounding communities. Specifically, my concern is that the proposed license lacks adequate protections for public health, air quality, and both storm and groundwater. In addition, the proposed license is too permissive of contaminated leachate, air pollution and odor emissions. I support the position taken by Oregon Air.

Thank you for your consideration.

Regards,
Vicki Madden Tualatin, OR

From: [Metro Solid Waste Compliance](#)
To: ["Robyn Shaw"](#)
Subject: RE: Grimm's Fuel Co. proposed license
Date: Tuesday, February 05, 2019 4:44:00 PM

Hello,

Thank you for your comment. More information about Metro's role and activities related to Grimm's Fuel Company can be found on our [website](#).

Thanks again,

*Hila

Hila Ritter
Solid Waste Authorization Coordinator
Property and Environmental Services
My gender pronouns: she, her, hers.
Metro | oregonmetro.gov
600 NE Grand Ave.
Portland, OR 97232-2736
503-797-1862

From: Robyn Shaw [mailto:████████@gmail.com]
Sent: Tuesday, February 05, 2019 1:34 PM
To: Metro Solid Waste Compliance <████████@oregonmetro.gov>
Subject: Grimm's Fuel Co. proposed license

Response to Metro's Proposed License:

Do you support Metro issuing this license as written? No

Do you have a concern that's not addressed in this license? Yes

The proposed license does not adequately address the following concerns:

- Public Health, Human Health Risks, Public Safety
- Leachate Contamination of Stormwater and Groundwater
- Air Pollution and Air Quality Monitoring
- Particulates, Bioaerosols, Odorous Compounds
- Gasses, Air Emissions, VOC's
- Air Quality and Environmental Damage

At an absolute minimum, the license should include all of the performance goals stipulated in Chapter 5 of the Metro Code section 5.01.090(c) specifically (1) Environment (2) Health and Safety and (3) Nuisances. We are unable to find any reference to “groundwater” or “public health” in the proposed license, and we believe that this license is not in compliance with

Metro Code. We ask that Metro **not** issue the license as currently written.

Additional input or specific license changes to suggest:

We appreciate the efforts that Metro has made to improve operations at Grimm's Fuel, however, there are a number of areas where the proposed license should be improved:

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

Public Health: We have serious concerns over the potential health impacts from living downwind from this composting operation, and we request a better understanding of all the airborne emissions from the facility. We request that a 24/7 automated air quality monitoring station be setup. We have a right to know what is in the air that we are breathing. We believe that both the regulator and the operator have a moral and ethical responsibility to the community to make sure that the air around the facility is safe to breathe. We live here.

Pile Size: In consideration of the fact that Metro does not have the authority to enforce the fire code, we ask Metro to include a maximum length and width in your pile size limit.

License Term: Although the transition to ASP composting may take 18 months, the proposed license term is 5 years. Unless Metro is willing to shorten the term of the license to match the length of the transition period, we request that Metro put a condition into the license that will require an impact study to be performed after the facility has completed the transition to ASP composting.

Offsite Dust: The dust protections in the proposed license are inadequate. We request that the license require the installation of dust monitoring and sampling equipment in the surrounding neighborhoods and properties.

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

Verification: We request that the license describe the process that Metro will use to double check and confirm the veracity of all measurements taken by the operator. Self regulation is not a feasible solution when it creates a conflict of interest.

Groundwater: We demand strong protections for groundwater and stormwater. Contaminated leachate must never be discharged into our local creeks and rivers.

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

Indoor Composting: In order to protect the health, safety, and property of the people who live and work near the facility, and considering the adverse conditions that we have lived under for the past many years, plus the fact that we are being asked to endure even more dust and odor conditions going forward, we respectfully request that the parties take a serious look

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

Transparency: We request 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,

Robyn Shaw

From: [Metro Solid Waste Compliance](#)
To: ["ROBYN SHAW"](#)
Subject: RE: Grimm's Fuel Co. propped license
Date: Tuesday, February 05, 2019 4:44:00 PM

Hello,

Thank you for your comment. More information about Metro's role and activities related to Grimm's Fuel Company can be found on our [website](#).

Thanks again,

*Hila

Hila Ritter
Solid Waste Authorization Coordinator
Property and Environmental Services
My gender pronouns: she, her, hers.
Metro | oregonmetro.gov
600 NE Grand Ave.
Portland, OR 97232-2736
503-797-1862

From: ROBYN SHAW [mailto:████████@aol.com]
Sent: Tuesday, February 05, 2019 1:40 PM
To: Metro Solid Waste Compliance <████████@oregonmetro.gov>
Subject: Grimm's Fuel Co. propped license

Dear sir or madam,

I would appreciate your consideration to amend Grimm's Fuel Co. proposed license as follows:

- Section 1.8: Facility legal description (page 3 of 22) includes five tax lots owned by Grimms. Composting is only permitted on tax lots 1800 and 1900 by the City of Tualatin conditional land use permit (CUP). Tax Lots other than 1800 and 1900 should be deleted from draft license.
- Section 6: A third party qualified technician should be assigned to test and record accurate measures of oxygen, temperature, moisture, etc.

- Section 7.16, Include: odor complaints received by Metro, to automatically be routed to DEQ, City of Tualatin and Grimm's.

Thank you,
Robyn Shaw

From: Metro Solid Waste Compliance
To: "Tim Pearson"
Subject: RE: Grimm's Fuel Compost Facility
Date: Tuesday, February 05, 2019 4:45:00 PM
Attachments: image002.png

Hello,

Thank you for your comment. More information about Metro's role and activities related to Grimm's Fuel Company can be found on our [website](#).

Thanks again,
*Hila

Hila Ritter
Solid Waste Authorization Coordinator
Property and Environmental Services
My gender pronouns: she, her, hers.
Metro | oregonmetro.gov
600 NE Grand Ave.
Portland, OR 97232-2736
503-797-1862

From: Tim Pearson [mailto: [REDACTED]@jameskingco.com]
Sent: Tuesday, February 05, 2019 3:34 PM
To: Metro Solid Waste Compliance < [REDACTED]@oregonmetro.gov>
Subject: Grimm's Fuel Compost Facility

Metro:

I'm sure you have all seen the professional crusaders latest propaganda, but just in case I pasted it below. What we have here is one guy who wants to bankrupt a local, multi-generational company by weaponizing the local regulators (that would be you—METRO).

Grimm's provides an important service to our community. I urge you to issue their license as is! I have personally visited their facility (as a concerned neighbor) and I am impressed with their progress towards meeting the requirements of said license.

Respectfully,

Tim Pearson

JUST IN CASE YOU CAN'T THINK FOR YOURSELF, BRETT WILL DO IT FOR YOU! THIS WAS AVAILABLE TO THE 6 PEOPLE THAT ATTENDED THE CRUSADERS LATEST PUBLIC MEETING.

2/1/2019

Nextdoor

Brett
Next Door

Public Comments Needed

In December, Oregon Air stopped Metro from issuing a defective license for Grimm's Fuel. Since then, Metro has made some revisions, but the proposed license still does not meet the needs of the community. Therefore, this license should not be issued as written. Please submit your comments to Metro ASAP. The public comments period closes on Tuesday at 5pm. We need your help.

We recommend that your comments include 5 points:

- 1) Do you support Metro issuing this license as written? No
- 2) Do you have a concern that's not addressed in this license? Yes
- 3) The proposed license lacks adequate protections for:
 - Public Health
 - Air Quality
 - Stormwater and Groundwater
- 4) The proposed license is too permissive of:
 - Contaminated Leachate
 - Air Pollution and Odor Emissions
- 5) Your support for the position taken by Oregon Air:
<http://www.oregonair.org/conditions>

Feel free to use our words or your own words, whatever works best for you. The most important point to make to Metro is that the proposed license should NOT be issued as written. The proposed license needs to be revised and improved.

Submit your comments via email to swicc@oregonmetro.gov or via the Metro website <http://www.oregonmetro.gov/grimms>

Please let us know if you have any questions!! Thanks!

Oregon Air <http://www.oregonair.org/>

From: [Metro Solid Waste Compliance](#)
To: ["Anne Lewis"](#)
Subject: RE: Grimm's Fuel
Date: Tuesday, February 05, 2019 10:39:00 AM

Hello,

Thank you for your comment. More information about Metro's role and activities related to Grimm's Fuel Company can be found on our [website](#).

Thanks again,
*Hila

Hila Ritter
Solid Waste Authorization Coordinator
Property and Environmental Services
My gender pronouns: she, her, hers.
Metro | oregonmetro.gov
600 NE Grand Ave.
Portland, OR 97232-2736
503-797-1862

From: Anne Lewis [mailto: [REDACTED]@gmail.com]
Sent: Saturday, February 02, 2019 1:44 PM
To: Metro Solid Waste Compliance < [REDACTED]@oregonmetro.gov >
Subject: Grimm's Fuel

Hello, I am in total opposition to Grimm's Fuel license renewal. I am just copying the talking points of Oregon Air. However, I feel you need to hear from Grimm's neighbors. I have lived in Tigard for 30 years. Over that time, I can only count a handful of really bad days from the compost odor emanating from Grimm's. However in the last several years it has become an issue more and more, sometimes for days or even weeks in a row. It is absolutely unacceptable for a business to hold it's neighbors hostage. There are days when I cannot even go outside because of the horrible stench. If I created a smell like that on my property, I would be fined and told it needed to stop. WHY are they allowed to pollute like this? It's not right and is lowering my property value as well. If action is not taken, I will be glad to be part of a class action lawsuit against Grimm's as well as the public agencies that are allowing this company to create a health hazard to the neighboring communities. Thanks for listening. Anne Lewis, 8958 SW Waverly Drive, Tigard, OR 97224

Response to Metro's Proposed License:

Do you support Metro issuing this license as written? No

Do you have a concern that's not addressed in this license? Yes

The proposed license does not adequately address the following concerns:

- Public Health, Human Health Risks, Public Safety
- Leachate Contamination of Stormwater and Groundwater
- Air Pollution and Air Quality Monitoring
- Particulates, Bioaerosols, Odorous Compounds
- Gasses, Air Emissions, VOC's
- Air Quality and Environmental Damage

At an absolute minimum, the license should include all of the performance goals stipulated in Chapter 5 of the Metro Code section 5.01.090(c) specifically (1) Environment (2) Health and Safety and (3) Nuisances. We are unable to find any reference to "groundwater" or "public health" in the proposed license, and we believe that this license is not in compliance with Metro Code. We ask that Metro **not** issue the license as currently written.

Additional input or specific license changes to suggest:

We appreciate the efforts that Metro has made to improve operations at Grimm's Fuel, however, there are a number of areas where the proposed license should be improved:

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

Public Health: We have serious concerns over the potential health impacts from living downwind from this composting operation, and we request a better understanding of all the airborne emissions from the facility. We request that a 24/7 automated air quality monitoring station be setup. We have a right to know what is in the air that we are breathing. We believe that both the regulator and the operator have a moral and ethical responsibility to the community to make sure that the air around the facility is safe to breathe. We live here.

Pile Size: In consideration of the fact that Metro does not have the authority to enforce the fire code, we ask Metro to include a maximum length and width in your pile size limit.

License Term: Although the transition to ASP composting may take 18 months, the proposed license term is 5 years. Unless Metro is willing to shorten the term

of the license to match the length of the transition period, we request that Metro put a condition into the license that will require an impact study to be performed after the facility has completed the transition to ASP composting.

Offsite Dust: The dust protections in the proposed license are inadequate. We request that the license require the installation of dust monitoring and sampling equipment in the surrounding neighborhoods and properties.

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

Verification: We request that the license describe the process that Metro will use to double check and confirm the veracity of all measurements taken by the operator. Self regulation is not a feasible solution when it creates a conflict of interest.

Groundwater: We demand strong protections for groundwater and stormwater. Contaminated leachate must never be discharged into our local creeks and rivers.

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

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

Transparency: We request 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.

February 1, 2019

From: [Metro Solid Waste Compliance](#)
To: ["Doug Hutchens"](#)
Subject: RE: Grimm's Fuel
Date: Wednesday, January 09, 2019 4:14:00 PM

Hello,

Thank you for your comment. More information about Metro's role and activities related to Grimm's Fuel Company can be found on our [website](#).

Thanks again,

*Hila

Hila Ritter
Solid Waste Authorization Coordinator
Property and Environmental Services
My gender pronouns: she, her, hers.
Metro | oregonmetro.gov
600 NE Grand Ave.
Portland, OR 97232-2736
503-797-1862

From: Doug Hutchens [mailto:[\[REDACTED\]@coastportland.com](mailto:[REDACTED]@coastportland.com)]
Sent: Wednesday, January 09, 2019 3:06 PM
To: Metro Solid Waste Compliance <[\[REDACTED\]@oregonmetro.gov](mailto:[REDACTED]@oregonmetro.gov)>
Subject: Grimm's Fuel

Grimm's Fuel has been a valuable asset to the business community in this area for a long time. I understand that communities have grown up around Grimm's business and now those who chose to purchase homes in the area are now wanting their neighbor to bend to their will and close its operation. They knew Grimm's Fuel was there when they purchased their property. Now they want Grimm's eliminated. They most likely want a Starbucks and a tanning salon to replace Grimm's so they can slurp their coffee and laugh about how they protested and got their way having Grimm's removed while they are tanning. Will they laugh when someone protests their existence and wants to get rid of them? Who's ox is getting gored is what they should think about.

A business that has served this community for years by recycling tons of yard debris is being forced out of business leaving a void for the service they provide to the area. People will be dumping branches and limbs in ditches at 3:00am because there is no where else to dispose of them at a reasonable cost. People will stuff their Christmas trees in their fireplaces and burn their house down rather than let them stack up in their back yards because there is no where to dispose of them. If every business that has some odor to it was closed or zoned out of business because of their odor then no one could get their septic tank pumped or their sewer line repaired because no smells are allowed. However the smell from the regional government will be deemed to be legal because we know how much government emits odors that are unpleasant.

From: [Metro Solid Waste Compliance](#)
To: ["LuAnne WELLS"](#)
Subject: RE: Grimm's Fuels License
Date: Tuesday, February 05, 2019 10:48:00 AM

Hello,

Thank you for your comment. More information about Metro's role and activities related to Grimm's Fuel Company can be found on our [website](#).

Thanks again,

*Hila

Hila Ritter
Solid Waste Authorization Coordinator
Property and Environmental Services
My gender pronouns: she, her, hers.
Metro | oregonmetro.gov
600 NE Grand Ave.
Portland, OR 97232-2736
503-797-1862

From: LuAnne WELLS [mailto:[\[REDACTED\]@msn.com](#)]
Sent: Monday, February 04, 2019 10:24 PM
To: Metro Solid Waste Compliance <[\[REDACTED\]@oregonmetro.gov](#)>
Subject: Grimm's Fuels License

As a Tualatin resident I have reviewed the proposed license for Grimm's Fuels, and I do not support it as written.

I am concerned with my Air Quality as well as groundwater contamination, among many others.

I believe Metro should be protecting our Environment along with being concerned with our health. As citizens of the greater metro area We should be your main concern.

I understand we need regional composting, but to allow a company to grow to such a large capacity in such a short period of time without much oversight is irresponsible.

Please, we are not asking to put this company out of business as some suggest, we just want a 'Good Neighbor' business that has some oversight and is being monitored and respects the community it exists within.

This can be achieved if we all work together. We know it's done at other facilities, it can be accomplished here as well....before the valley becomes known 'by the smell' rather than it's great opportunities for communities & families to thrive in such a beautiful area.

Thank you for all you've done in getting things moving in the right direction, let's keep it going!

Sincerely,

LuAnne Wells

From: [Metro Solid Waste Compliance](#)
To: ["Julie Nader"](#)
Subject: RE: Grimms
Date: Friday, February 01, 2019 1:15:00 PM

Hello,

Thank you for your comment. More information about Metro's role and activities related to Grimm's Fuel Company can be found on our [website](#).

Thanks again,
*Hila

Hila Ritter
Solid Waste Authorization Coordinator
Property and Environmental Services
My gender pronouns: she, her, hers.
Metro | oregonmetro.gov
600 NE Grand Ave.
Portland, OR 97232-2736
503-797-1862

From: Julie Nader [mailto:julie_ [REDACTED] yahoo.com]
Sent: Friday, February 01, 2019 10:46 AM
To: Metro Solid Waste Compliance < [REDACTED]@oregonmetro.gov>
Subject: Grimms

Hi! I live in Sherwood and for many months have smelled an objectionable stench coming from Grimms.

I am concerned about public health, polluting our creeks (Rock and Chicken) and the Tualatin River.

The license under consideration is absolutely not adequate to address the concerns of the community and not only affects our health but our ability to enjoy the outdoors.

Please include requiring an impact study after Grimms completes the transition to ASP composting. Five years is a LONG time! There also needs to be a clear, meaningful, measurable and enforceable provisions for measuring odors.

Please consider my comments and
I look forward to an improved license.

Have a great day!
Julie

Julie Nader

From: [Metro Solid Waste Compliance](#)
To: ["Sandi Peskin"](#)
Subject: RE: License for Grimm's Fuel
Date: Tuesday, February 05, 2019 10:36:00 AM

Hello,

Thank you for your comment. More information about Metro's role and activities related to Grimm's Fuel Company can be found on our [website](#).

Thanks again,

*Hila

Hila Ritter
Solid Waste Authorization Coordinator
Property and Environmental Services
My gender pronouns: she, her, hers.
Metro | oregonmetro.gov
600 NE Grand Ave.
Portland, OR 97232-2736
503-797-1862

From: Sandi Peskin [mailto: [REDACTED]@gmail.com]
Sent: Saturday, February 02, 2019 9:33 AM
To: Metro Solid Waste Compliance < [REDACTED]@oregonmetro.gov >
Subject: License for Grimm's Fuel

Metro Representatives:

As a Resident in Tigard east of Grimm's Fuel operations, I ask you to revise the current licensing for this company. I support the position of OregonAir and ask that you follow the recommendations they have submitted to you. The potential for environmental harm and the extent of noxious odors is not acceptable. Please do your duty to protect citizens and the environment from harm and craft a better solution.

Respectfully,
Sandi Peskin

From: [Metro Solid Waste Compliance](#)
To: ["Conrad Thomason"](#)
Subject: RE: License Renewal
Date: Tuesday, February 05, 2019 10:37:00 AM

Hello,

Thank you for your comment. More information about Metro's role and activities related to Grimm's Fuel Company can be found on our [website](#).

Thanks again,

*Hila

Hila Ritter
Solid Waste Authorization Coordinator
Property and Environmental Services
My gender pronouns: she, her, hers.
Metro | oregonmetro.gov
600 NE Grand Ave.
Portland, OR 97232-2736
503-797-1862

From: Conrad Thomason [mailto:conrad [REDACTED] gmail.com]
Sent: Saturday, February 02, 2019 11:42 AM
To: Metro Solid Waste Compliance <[REDACTED]@oregonmetro.gov>
Subject: Fwd: License Renewal

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

From: **Conrad Thomason** <[conrad.\[REDACTED\]@gmail.com](mailto:conrad.[REDACTED]@gmail.com)>
Date: Sat, Feb 2, 2019 at 10:51 AM
Subject: License Renewal
To: Conrad Thomason <[conrad.\[REDACTED\]@gmail.com](mailto:conrad.[REDACTED]@gmail.com)>

We are residents of Sherwood, Oregon and object to the license renewal for Grimms fuel co. as proposed.

The compost piles at Grimms expel odor and particles in the air which directly affect the environment in the following areas: Sherwood, Tualatin, Tigard, The Tualatin River National Wildlife Refuge, and Beaverton. The proposed license renewal for Grimms does not address the following effects of these compost piles. The air in these areas smells like manure. The particles carried by the air, therefore still affect public health and, potentially that of wildlife. Storm and ground water is threatened with pollution. The odor, itself, if it persists, will affect property values in these areas. If these conditions continue the quality of life in this valley is compromised.

We support the position taken vis. license renewal for Grimms bu oregonair.org.

Thank you for your consideration.

Conrad and Carolyn Thomason
18183 sw Handley St.
Sherwood, Or 97140

From: [Metro Solid Waste Compliance](#)
To: ["Linda Weiland"](#)
Subject: RE: No permit
Date: Friday, February 01, 2019 4:42:00 PM

Hello,

Thank you for your comment. More information about Metro's role and activities related to Grimm's Fuel Company can be found on our [website](#).

Thanks again,
*Hila

Hila Ritter
Solid Waste Authorization Coordinator
Property and Environmental Services
My gender pronouns: she, her, hers.
Metro | oregonmetro.gov
600 NE Grand Ave.
Portland, OR 97232-2736
503-797-1862

From: Linda Weiland [mailto:[\[REDACTED\]@yahoo.com](#)]
Sent: Friday, February 01, 2019 4:34 PM
To: Metro Solid Waste Compliance <[\[REDACTED\]@oregonmetro.gov](#)>
Subject: No permit

- 1) Do you support Metro issuing this license as written? No
- 2) Do you have a concern that's not addressed in this license? Yes
- 3) The proposed license lacks adequate protections for:
 - Public Health
 - Air Quality
 - Stormwater and Groundwater
- 4) The proposed license is too permissive of:
 - Contaminated Leachate
 - Air Pollution and Odor Emissions
- 5) Your support for the position taken by Oregon Air:
<http://www.oregonair.org/conditions>

Linda

From: [Metro Solid Waste Compliance](#)
To: ["Maria Michalczyk"](#)
Subject: RE: Odor/Polluted Air from Grimms Compost
Date: Wednesday, February 06, 2019 2:22:00 PM

Hello,

Thank you for your comment. More information about Metro's role and activities related to Grimm's Fuel Company can be found on our [website](#).

Thank you for explaining your technology issues, this comment will be considered as part of the formal comment period.

Thanks again,
*Hila

Hila Ritter
Solid Waste Authorization Coordinator
Property and Environmental Services
My gender pronouns: she, her, hers.
Metro | oregonmetro.gov
600 NE Grand Ave.
Portland, OR 97232-2736
503-797-1862

From: Maria Michalczyk [mailto:████████@easystreet.net]
Sent: Tuesday, February 05, 2019 5:15 PM
To: Metro Solid Waste Compliance <████████@oregonmetro.gov>
Cc: Maria Michalczyk <████████@easystreet.net>
Subject: Odor/Polluted Air from Grimms Compost

I am writing this email around the licensing of Grimms Compost. I had written an email just a moment ago and could not get it out of my mobile phone so I hope you will accept this email. I wanted to share that I frequently notice the odor around my home and all around the 97224 area. I am concerned that if the odor is so noticed that there is a health hazard to humans and our environment. I just ask that our officials ensure that this odor is safe for all of us having clean air. Grimms offer a great service and I see this as being a win win for all of our community. Please ensure that the odor is cleaned up so that we all breathe clean air.

Thank you so much.

Maria M

From: [Hila Ritter](#)
To: [REDACTED]@frontier.com"
Subject: RE: Public Comment - Grimm's License Renewal
Date: Tuesday, February 05, 2019 12:59:00 PM

Hello,

Thank you for your comment. More information about Metro's role and activities related to Grimm's Fuel Company can be found on our [website](#).

Thanks again,
*Hila

Hila Ritter
Solid Waste Authorization Coordinator
Property and Environmental Services
My gender pronouns: she, her, hers.
Metro | oregonmetro.gov
600 NE Grand Ave.
Portland, OR 97232-2736
503-797-1862

From: [REDACTED]@frontier.com [mailto:[REDACTED]@frontier.com]
Sent: Tuesday, February 05, 2019 12:55 PM
To: Metro Solid Waste Compliance <[REDACTED]@oregonmetro.gov>; Brett Hamilton <[REDACTED]@simple.be>;
Hila Ritter <Hila.[REDACTED]@oregonmetro.gov>; jneumann <[REDACTED]@frontier.com>; Ata Saedi
<[REDACTED]@hotmail.com>
Subject: Public Comment - Grimm's License Renewal

To Whom it May Concern,

I've have been relentlessly reporting horrid odors and dust particles poisoning the Pony Ridge and Angel Haven neighborhoods for a better part of two years now. As the current version of Metro's proposed license renewal exists, there appears to be NO END in sight to even reduce the noxious odors let alone eliminate them. This is seriously unacceptable!

Grimm's recent efforts to reduce the compost pile height has only exacerbated the problem. Removing and relocating the top of a mountainous compost pile to a different corner of the property only masks the height of the pile and does NOTHING to properly mitigate the poisonous odor and dust particles constantly flying through the air we breathe! Continually screening the middle and bottom portion of the enormous pile solves nothing.

This rotten material needs to be completely removed from the property (train cars, semi trucks, dump trucks) and spread far away from human and animal contact to the

degree that it can be - possibly somewhere in the eastern Oregon desert. Afterwards, an enclosed building with modern equipment to mitigate odor and dust air particles and pollution needs to be built.

We will not accept another two years of this putrid odor emanating from Grimm's and poisoning the air in three counties or more. These serious problems have solutions now and I would expect that Metro, DEQ, the City of Tualatin and the state of Oregon work in the direction of solutions and not masks and excuses.

Let me remind the government entities once again: None of us would be in the predicament we are today had the agencies regulating this type of license done so properly in the first place. Instead, in my opinion there has been an incredible amount of passing the buck and the blame - mostly to the neighbors who have been actively seeking a positive solution.

Seriously,
Julie Neumann

From: [Metro Solid Waste Compliance](#)
To: ["Janet Weber"](#)
Subject: RE: Public Comment on Grimm's License
Date: Tuesday, February 05, 2019 10:49:00 AM

Hello,

Thank you for your comment. More information about Metro's role and activities related to Grimm's Fuel Company can be found on our [website](#).

Thanks again,

*Hila

Hila Ritter
Solid Waste Authorization Coordinator
Property and Environmental Services
My gender pronouns: she, her, hers.
Metro | oregonmetro.gov
600 NE Grand Ave.
Portland, OR 97232-2736
503-797-1862

From: Janet Weber [mailto: [REDACTED]@hotmail.com]
Sent: Tuesday, February 05, 2019 2:37 AM
To: Metro Solid Waste Compliance < [REDACTED]@oregonmetro.gov >
Subject: Public Comment on Grimm's License

Do I support Metro issuing this new license as written? NO!

Do I have a concern that's not addressed in this license? YES! Because the proposed license **does not** adequately address the following concerns:

- Public Health, Human Health Risks, Public Safety
- Leachate Contamination of Stormwater and Groundwater
- Air Pollution **AND** Air Quality Monitoring
- Particulates, Bioaerosols, Odorous Compounds
- Gasses, Air Emissions, VOC's
- Air Quality and Environmental Damage

At an absolute minimum, the license should include **ALL** of the performance goals stipulated in Chapter 5 of the Metro Code section 5.01.090(c) specifically: (1) Environment (2) Health and Safety and (3) Nuisances.

My neighbors and I are unable to find any reference to “groundwater” or “public health” in the proposed license, and we believe that this license **is not** in compliance with Metro Code. We ask that Metro **not** issue the license as currently written.

Here's some additional input and specific license changes suggestions. While my

neighbors and I appreciate the efforts that Metro has made to improve operations at Grimm's Fuel, however, there are a number of areas where the proposed license should be improved, such as:

- **Active Composting:** We request that the license *define* the difference between: (1) active compost piles, (2) curing compost piles, and (3) finished compost piles. We ask that the license include a stability test that uses clear, objective, measurable criteria.
- **Public Health:** We have serious concerns over the potential health impacts from living downwind from this composting operation, and we request a better understanding of all the airborne emissions from the facility. We request that a 24/7 automated air quality monitoring station be setup. We have a right to know what is in the air that we are breathing, **ESPECIALLY** for those of us who suffer from respiratory conditions. We believe that both the regulator and the operator have a moral and ethical responsibility to the community to make sure that the air around the facility is safe to breathe. It is not right to be polluting the air without our permission. We live and work here too!
- **Pile Size:** In consideration of the fact that Metro does not have the authority to enforce the fire code, we ask Metro to include a maximum length and width in your pile size limit.
- **License Term:** Although the transition to ASP composting may take 18 months, the proposed license term is 5 years. Unless Metro is willing to shorten the term of the license to match the length of the transition period, we request that Metro put a condition into the license that will **require** an impact study to be performed after the facility has completed the transition to ASP composting.
- **Offsite Dust:** The dust protections in the proposed license are inadequate. We request that the license **require** the installation of dust monitoring and sampling equipment in the surrounding neighborhoods and properties.
- **Offsite Odors:** Considering that Metro has declined the opportunity to put any measurable odor standard in the license, ***we request that the license require no offsite odor.*** We will not tolerate nuisance odors in our homes and on our private property, especially without our permission! Metro needs to replace the vague language of "minimize offsite odors" with an odor standard that is clear, meaningful, *and* measurable.
- **Verification:** We request that the license describe the process that Metro will use to double check and confirm the veracity of all measurements taken by the operator. Self regulation ***is not*** a feasible solution when it creates a conflict of interest *and* can be easily tampered with.
- **Groundwater:** We demand strong protections for groundwater and stormwater. Contaminated leachate must never be discharged into our local creeks and rivers.
- **Flow Rate:** Considering that air flow is crucial to maintaining proper temperature and oxygen levels in the active piles, we request that the license *require the operator to* monitor, track, and record the air flow rate and pressure drop on all air blowers at the facility.

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

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

Final comments and concerns:

Sustainability: I do not understand for the life of me why Metro spent money on a highly qualified consultant (Green Mountain Technologies) which did an amazing and thorough job of studying and evaluating Grimm's operation which resulted in four plans to compost using safe AND sustainable practices and why NONE of the four options in full are being required of Grimm's. If Metro originally required the entirety of one of these four plans, we wouldn't be where we are right now. Metro could of chosen a plan for Grimm's to adopt with no and's or but's and if they didn't like it, then their license should have been revoked...end of story.

The bottom line is that Grimm's practices are outdated and need to be modernized and sustainable for today's environment and the environment for future Oregonians...its such a simple Oregonian value. As an OSU Master Gardener, I know how important it is to Metro to educate the region in sustainable gardening practices, but it is VERY misleading to the public when it will not stand up to Grimm's and make them practice sustainable composting practices. I am very embarrassed for the Metro Master Gardener program to have a neighbor who doesn't think sustainable and proper composting practices need to apply to them. Yes, I know it costs a great deal of money to make improvements, but why can't Grimm's see that by updating their equipment, practices, and protocol that it will help build their equity, property value, and not to mention longevity of their business in the long run?

The uninformed citizen: I know that other community members are also sending in their comments. Metro needs to realize that there are many people out there thinking that those of us who are pushing for sustainable practices are trying to put Grimm's out of business. This is ludicrous and couldn't be farther from the truth. These people have not spent the time to educate themselves on all of the work that Metro, DEQ, other governmental entities, and public organizations have done as these folks have no clue as to what the nitty-gritty details are of this entire situation. They are uninformed and choose to be. They do not care about Grimm's antiquated practices, the environment, and other people's health and well-being and are closed-minded to learn about sustainability and modernized compost production. I hope that Metro and DEQ can filter these out because they are merely speaking with closed minds and care more about their pocket books. These people show little to no empathy for those of us who are suffering greatly from Grimm's outdated practices.

My Health: I urge Metro and DEQ to seriously consider adding the above mentioned suggestions to the new and updated Grimm's licensure. I shouldn't have to continuously be exposed to this wretched dust and atrocious air quality every time I want to be outside and I shouldn't have to hold my breath walking from my car to my front door, or have to wear a dust mask when I need to go outside and water my plants, nor should I have to be woken up in the

middle of the night during the summer to close my windows because of the odor coming in. As an asthmatic with another respiratory health condition, I should have the right to clean air, just as much as the next person. There isn't a problem with my water, so there shouldn't be a problem with my air. Unfortunately, Grimm's has NEVER asked for my permission if its OK to pollute my air. They do not have my permission, or will they.

Please do the right thing and hold Grimm's accountable for requiring their license to carry out sustainable composting practices with the health of the community and its employees in mind. Thank you.

Sincerely,
Janet

From: [Hila Ritter](#)
To: "[REDACTED]@frontier.com"
Cc: [Ata Saedi](#); [Brett Hamilton](#)
Subject: RE: Public Comments - Grimm's License Renewal
Date: Tuesday, February 05, 2019 4:56:00 PM

Hello,

Thank you for your comment. More information about Metro's role and activities related to Grimm's Fuel Company can be found on our [website](#).

Thanks again,
*Hila

Hila Ritter
Solid Waste Authorization Coordinator
Property and Environmental Services
My gender pronouns: she, her, hers.
Metro | oregonmetro.gov
600 NE Grand Ave.
Portland, OR 97232-2736
503-797-1862

From: [REDACTED]@frontier.com [mailto:[REDACTED]@frontier.com]
Sent: Tuesday, February 05, 2019 4:51 PM
To: Metro Solid Waste Compliance <[REDACTED]@oregonmetro.gov>; Ata Saedi <[REDACTED]@hotmail.com>; Brett Hamilton <[REDACTED]@simple.be>; jneumann <[REDACTED]@frontier.com>; Hila Ritter <Hila [REDACTED]@oregonmetro.gov>
Subject: Public Comments - Grimm's License Renewal

In addition to my previous public comments, a few words must be added regarding **quality of life** in the neighborhoods of Angel Haven and Pony Ridge. Because of the terrible stench nearly everyday (for several months now) being able to enjoy the following is **impossible**:

1. Taking a walk for fun and exercise
2. Opening windows
3. Keeping vehicles dust/particle free
4. Having a BBQ in the yard
5. Shooting hoops, riding bikes, playing outdoor games
6. Visiting with neighbors outdoors

We have many elderly (with compromised health issues), young children and vulnerable pets all suffering from the malodor and polluted particulates in the air because of operating procedures at Grimm's Fuel Company. Surely, that must mean something because it is taking a huge toll on the livability of these neighborhoods!

Seriously,
Julie Neumann

It's not enough to rage against the lie... you've got to replace it with the truth. ~Bono

From: [Hila Ritter](#)
To: [REDACTED]@frontier.com"; [Metro Solid Waste Compliance](#); [Brett Hamilton](#)
Subject: RE: Public Comments Regarding Grimm's Fuel Co. Renewed License
Date: Tuesday, February 05, 2019 10:34:00 AM

Hello,

Thank you for your comment. More information about Metro's role and activities related to Grimm's Fuel Company can be found on our [website](#).

Thanks again,

*Hila

Hila Ritter
Solid Waste Authorization Coordinator
Property and Environmental Services
My gender pronouns: she, her, hers.
Metro | oregonmetro.gov
600 NE Grand Ave.
Portland, OR 97232-2736
503-797-1862

From: [REDACTED]@frontier.com [mailto:[REDACTED]@frontier.com]
Sent: Monday, February 04, 2019 2:50 PM
To: Metro Solid Waste Compliance <[REDACTED]@oregonmetro.gov>; Brett Hamilton <[REDACTED]@simple.be>; jneumann <[REDACTED]@frontier.com>; Hila Ritter <Hila [REDACTED]@oregonmetro.gov>
Subject: Public Comments Regarding Grimm's Fuel Co. Renewed License

To Whom It May Concern:

As a homeowner in the Pony Ridge neighborhood, I know full well that we live almost daily with an extremely foul odor emanating from Grimm's Fuel Company along with air particles that are most likely poisonous due to the pesticides and insecticides used on the material before it even arrives at Grimm's. As currently written, I absolutely do NOT support the license Metro is proposing for Grimm's Fuel Company. Metro can and should write a license that takes all parties and issues into consideration in an equitable manner. When a problem does have a solution, the expectation should be to solve it. Stating it can't be done or it can only minimally be done is counterproductive.

The license does NOT adequately address the following concerns:

- Public Health, Human Health Risks, Public Safety
- Leachate contamination of Stormwater and Groundwater
- Air Pollution and Air Quality Monitoring
- Particulates, Bioaerosols, Odorous compounds

- Gasses, Air Emissions, VOC's,
- Air Quality and Environmental Damage

At an absolute minimum, the proposed license should include all of the performance goals stipulated in Chapter 5 of the Metro Code section 5.01.090(c) specifically (1) Environment (2) Health and Safety and (3) Nuisances. We are unable to find any reference to “groundwater” or “public health” in the proposed license, and we believe that this license is not in compliance with Metro Code. We ask that Metro not issue the license as currently written.

We appreciate the efforts that Metro has made to improve operations at Grimm's Fuel, however, **there are a number of areas where the proposed license should be improved:**

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

Public Health: We have serious concerns over the potential health impacts from living downwind from this composting operation, and we request a better understanding of all the airborne emissions from the facility. We request that a 24/7 automated air quality monitoring station be setup. We have a right to know what is in the air that we are breathing. We believe that both the regulator and the operator have a moral and ethical responsibility to the community to make sure that the air around the facility is safe to breathe. We live here.

Pile Size: In consideration of the fact that Metro does not have the authority to enforce the fire code, we ask that the Metro pile size limit specify a maximum length and width.

License Term: Although the transition to ASP composting may take 18 months, the proposed license term is 5 years. Unless Metro is willing to shorten the term of the license to match the length of the transition period, we request that Metro put a condition into the license that will require an impact study be performed after the facility has completed the transition to ASP composting.

Offsite Dust: The dust protections in the proposed license are not adequate. We request that the license require the installation of dust monitoring and sampling equipment in the surrounding neighborhoods and properties. The license needs to clarify that offsite dust impacts will be a violation.

Offsite Odors: Considering that Metro has declined the opportunity to put any measurable odor standard in the license, we request that the license require no offsite odor. We will not tolerate nuisance odors in our homes and on our private property. Metro needs to replace the vague language of “minimize offsite odors” with an odor standard that is clear, meaningful, and measurable.

Verification: We request that the license describe the process that Metro will use to

double check and confirm the veracity of all measurements taken by the operator. Self regulation is not a feasible solution when it creates a conflict of interest.

Groundwater: We demand strong protections for groundwater and stormwater systems. Contaminated leachate must never be discharged into our local creeks and rivers.

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

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

Transparency: We request 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.

Seriously,
Julie Neumann