

Memo



Metro

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Date: February 25, 2019
To: Roy W. Brower, Interim Property and Environmental Services Director
Through: Warren Johnson, Interim Solid Waste Information, Compliance, and Cleanup Director *WJ*
From: Hila Ritter, Interim Solid Waste Compliance Manager *HR*
Subject: Renewal of Solid Waste Facility License No. L-043-19 for Grimm's Fuel Company

Attached for your signature is renewed Solid Waste Facility License No. L-043-19 for Grimm's Fuel Company (Grimm's) which renews its authorization to compost yard debris. The proposed license contains substantial changes and new conditions in order to address anaerobic composting conditions and associated impacts to the surrounding community. Specifically, it includes new provisions that require Grimm's to significantly reduce compost pile sizes and implement an aerated static pile method of composting. This memo provides information on the proposed renewed license and recommends that Metro issue the license as attached. The proposed license becomes effective on March 1, 2019 and expires on December 31, 2023.

BACKGROUND

The applicant, Grimm's, is a locally owned and operated yard debris composting facility that is regulated by both Metro and Oregon Department of Environmental Quality (DEQ). The facility primarily accepts yard debris and leaves for composting, and is also authorized to accept incidental amounts of source-separated, pre-consumer vegetative food waste for composting (such as pumpkins or other garden waste), incidental amounts of horse manure, clean untreated wood waste for the production of hogged fuel, and inert materials (such as rock).

In early 2017, Metro invited public input from the surrounding community regarding the upcoming license renewal. Grimm's license was initially set to expire on June 30, 2017 (License No. L-043-12), and Metro extended the term of the license until December 31, 2017 (License No. L-043-12B), to ensure that residents and businesses surrounding the facility had sufficient opportunity to provide input on the proposed license renewal. As a result of that process, Metro solicited proposals for a third-party to perform an independent assessment of Grimm's composting operations to identify best management practices and odor mitigation recommendations to better inform potential license provisions. Metro subsequently renewed Grimm's license for an additional one year (License No L-043-18) to allow time for Metro's selected contactor, Green Mountain Technologies (GMT), to perform the site assessment and provide Metro with recommendations for operational improvements with an emphasis on odor mitigation at the facility. That one-year license carried forward all of the provisions in the previous license with an added provision requiring Grimm's to allow site access and to cooperate with GMT during the site assessment. GMT produced an 80-page report that described alternative approaches to managing compost piles, and provided recommendations for objective regulatory tools. The report is available at oregonmetro.gov/grimms.

Since June 2017, Metro has hosted four community conversations with the public to solicit input from residents and businesses around the facility, provide information about Metro's authorization process, bring together government agencies with similar yet distinct authority or expertise as it relates to Grimm's to answer questions and share information with the public, provide access to GMT's findings and recommendations, and provide an opportunity for the public to comment on proposed license

amendments.¹ Metro evaluated the information provided by GMT, and in concert with additional feedback from Grimm's, other government organizations, the community, and other local compost operators, released a draft of proposed license conditions for Grimm's for a 30-day public comment period, which included a public meeting in October 2018. After the close of the comment period on November 30, Metro received feedback from community leaders and city of Tualatin requesting that Metro extend Grimm's current license for an additional two months to allow for public review of the proposed license in its entirety, and to meet again with community leaders to discuss the proposed license conditions. In response to this request, Metro extended Grimm's current license for two months (License No. L-043-18A). The short-term extension carried forward all of Grimm's previous provisions and expires on February 28, 2019. Metro then hosted a meeting for community leaders on January 23, 2019 to review Metro's actions to date and discuss the proposed changes to the license.

A timeline of Metro's actions from 2017 to December 2018, is included as attachment A.



Photo 1: Community conversation, May 7, 2018 – Sherwood Center for the Arts

METRO CODE RENEWAL CRITERIA

Metro Code Section 5.01.110 states that:

The Chief Operating Officer must approve a solid waste facility license renewal unless the Chief Operating Officer determines that the proposed license renewal is not in the public interest. The Chief Operating Officer may attached conditions to any renewed license

Metro Code provides that the COO will renew a solid waste facility license unless the COO determines that the proposed renewal is not in the public interest. Grimm's currently processes about 60 percent of the region's yard debris for composting. Facilities like Grimm's play an important role in the region's solid

¹ (1) June 12, 2017 – Tualatin Public Library (2) May 7, 2018 – Sherwood Center for the Arts, (3) July 19, 2018 – Sherwood Center for the Arts, (4) October 30, 2018 Juanita Pohl Community Center Tualatin

waste recovery efforts because they compost yard debris and recycle wood waste that might otherwise be disposed at a landfill or burned.

COMPLIANCE HISTORY OF THE APPLICANT

Metro has an obligation to the public to ensure that the waste intended for reuse, recycling and other purposes is handled properly and sent to appropriate markets, and that all other waste is safely managed and disposed. In carrying out its oversight responsibilities, Metro balances the need to preserve yard debris composting capacity in or near the region with the needs of the local communities that live and work near these facilities. In 2017, Metro staff conducted seven routine inspections and 26 odor audits of Grimm's and the surrounding area. In 2018, Metro staff conducted eight routine inspections and 29 odor audits of Grimm's and the surrounding area.

According to DEQ, the agency issued a Notice of Civil Penalty Assessment and Order (Notice) to Grimm's on July 12, 2018. The Notice cited the following violations: 1) failing to collect leachate in a containment structure that has adequate capacity to collect and contain the leachate; 2) failing to conduct monitoring of the three active compost cells in compliance with the schedule prescribed in the facility's Operation Plan; 3) failure to report open burning to DEQ within 24 hours; 4) allowing the compost pile to exceed Oregon Fire Code height limit of 25 feet; and 5) turning the compost piles during the February 2018 weather inversion. Grimm's has appealed the Notice and as of the date of this report, the violation is pending.

City of Tualatin Community Development Department staff have indicated that the facility is in compliance with local land use regulations.

PUBLIC NOTICE AND OPPORTUNITY TO COMMENT

Metro released a revised draft license, in its entirety, for an additional 30-day public comment period beginning on January 4, 2019. By the close of the comment period on February 5, 2019, Metro received 60 comments from 51 individuals. Metro received 29 out of the 60 comments via a web-form created to acquire comments and 31 comments via email. On the web-form, Metro invited commenters to answer these three questions with space provided to explain one's position:

1. Do you support Metro issuing this license as written?
2. Do you have a concern that's not addressed in this license?
3. Do you have additional input or specific changes to suggest relating to the draft license?

Metro asked the above questions in order to solicit additional feedback and to provide a broader perspective on the overall license. Staff reviewed the comments in their totality to identify any new information that had not previously been considered by Metro. Many of the comments that Metro received during this timeframe were similar to those that were previously addressed in Metro's response to comments on January 4, 2019 (see attachment B). The additional input that Metro received during this latest comment period is further discussed in this staff report.

SUMMARY OF WRITTEN PUBLIC COMMENTS AND METRO'S RESPONSE

The public comments that Metro received during this comment period are summarized in nine categories:

1. Land Use
2. The proposed conditions are too stringent
3. The proposed conditions need to be stronger

4. The proposed license does not meet Metro Code requirements
5. Environmental monitoring
6. Economic impacts
7. Community involvement in regulation and enforcement needs to increase
8. Health impacts of compost
9. Odors

Metro provided the redacted public comments (received January – February 2019) to Grimm's on February 21, 2019. Grimm's then submitted a response to comments to Metro. Grimm's response to comments are included as attachment D.

All of these public comments are included in full as attachment C. Metro's responses address each category in no particular order.

1. **Land Use** – Metro received a range of comments about land use issues including that:
 - Facility legal description (page 3 of 22 in L-043-19) includes all five tax lots owned by Grimm's, although only two of those tax lots (1800 and 1900) are authorized for composting per city of Tualatin conditional land use permit. Therefore, the other tax lots should be removed from license.
 - Grimm's was operating before substantial residential housing came into the area and it should be allowed to continue.
 - Residential housing shouldn't be allowed so close to a compost facility.

Metro's response #1 – Land use:

Metro primarily relies on local governments, such as the city of Tualatin, for land use determinations. According to the city of Tualatin, Grimm's is located in a "Heavy Manufacturing" zone and it holds the necessary land use approval for yard debris composting operations on two tax lots (1800 and 1900). Grimm's began its composting operations in Tualatin in the 1970s. Over time, the nearby residential density increased while Grimm's operations intensified by accepting larger volumes of yard debris. In the 1990s, the city of Tualatin allowed residential uses near the Grimm's site at the request of a land developer.

The eastern parcels of Grimm's property (lots 2100, 2190 and 2202) are used for storage of products, including finished compost piles. Metro's proposed license includes conditions restricting the pile sizes for all compost piles, including finished compost. All five tax lots are included in the proposed license to include oversight of material storage areas in addition to active composting operations.



Photo 2: Aerial photo of Grimm's Fuel Company Tualatin properties with tax lots outlined in blue.

2. The proposed license conditions are too stringent.

- Grimm's is being treated unfairly.
- Requiring an ASP system is not necessary.
- Opposition to Oregon Air's proposal to require compost operation inside a building.
- Grimm's provides a valuable service to local residents and businesses.
- Allow Grimm's to build a digester.
- Any changes should be the least allowable under the law and proven by science.
- Metro should allow a 4-5 day start-up period for the compost to activate before applying air.
- Defer pile size maximum determinations to Fire Department for finished product stockpiles.

Metro response #2 - Proposed license conditions too stringent:

To better inform potential license changes, Metro contracted GMT to independently assess Grimm's composting operations and identify best management practices and recommendations for odor mitigation opportunities. Metro also solicited comments from DEQ, Grimm's, and several unaffiliated compost facility operators about the draft general performance requirements. Metro used all these sources, in addition to the legal counsel of the Office of Metro Attorney, to propose practical and effective conditions in the Grimm's license. Metro provided technical assistance to Grimm's by using GMT to consult for operational improvements and Grimm's has since hired GMT to design its aerated static pile composting system.

Grimm's did not apply to Metro to either conduct its composting operations inside a building or propose to build an anaerobic digester. Based on the recommendations of GMT, Grimm's can reconfigure its operations to effectively address off-site odor issues without constructing a building. In addition, anaerobic digestion is not the most effective method to manage large quantities of yard debris.

3. The proposed license conditions need to be stronger or need to be supplemented with additional requirements. Suggestions for requirements included the following:
- Establish a maximum amount of material the facility can accept for processing.
 - Require the operator to monitor, track and record the air flow rate and pressure drop.
 - Set objective, measureable criteria in performance and odor, dust, and other emissions monitoring.
 - Require a third-party odor monitoring service and/or provide the equipment and training for local residents to perform odor monitoring.
 - Require a third-party provider to monitor oxygen, temperature, moisture, etc. or otherwise verify accuracy of sampling.
 - Concerns that not all of GMT's recommendations being implemented.
 - Reduce term of license to 18 months (to align with completion of ASP system).
 - Require Grimm's to perform composting operations inside a building.
 - Require zero off-site odor and monitor using a third party hired by Metro.
 - Require Grimm's to truck existing material to another location.
 - Include maximum pile length and width in pile size limits.
 - Determine and announce the stages of construction of the ASP composting system and do not allow any changes to the construction timeline.
 - Require Grimm's to cover compost piles.
 - Requirements of proposed license are antiquated.
 - Define the types of compost piles on site (such as active, finished, etc.) and test for stability.

Metro's response #3 - Proposed license conditions need to be more stringent:

Grimm's current large static pile method of composting is insufficient to control odors as was documented by GMT and noted by the community. While the decomposition of organic material will always generate some odor, it is difficult to objectively quantify the composition of odors to any high degree. Therefore, Metro requires compost facilities, including Grimm's, to control and minimize odors. Metro has recently initiated a multifaceted study to evaluate and inform potential region-wide compost facility standards including odor and product quality.

Metro's current and near term focus at Grimm's is to improve operation and material management practices to reduce odors and dust, including: reducing the amount of material on site, lowering pile heights, improving oxygen levels in the piles, using bio covers and bio filters, and aerating composting piles. Properly implemented operational changes made in a timely manner will result in less odor and fewer other offsite impacts. It is critical to keep the Grimm's operation focused on investing in and implementing these operational changes and meeting the timelines set forth in the proposed license. Staff finds that it is premature to require specific odor standards or require a particular olfactometer to measure off-site odors at this time. Similarly it is premature to require Grimm's to fully enclose its composting operations within a building. The required operational changes and increased monitoring requirements, including mandatory corrective action if thresholds are not met will provide reduced odors and off-site impacts. As mentioned above, Metro is performing additional research and plans to propose additional regulatory standards in the future. Metro and DEQ are responsible for regulatory oversight of composting facilities and will continue to perform facility inspections, review composting parameter records, and complaint investigations in neighboring areas surrounding the facility.

In addition, Metro evaluated GMT's recommendations and incorporated all of them into the proposed license, with the exception of four recommendations as explained in the response to comments in attachment B.

The proposed license will expire at the end of 2023. This term is necessary to give the operator sufficient time to secure and make the investments needed to reduce local impacts. Metro may limit the flow of incoming materials if timely progress is not made in the conversion to an ASP composting method. Metro may also modify the provisions of the license should it become necessary.

Metro does not rely on third parties to conduct monitoring of solid waste sites. Metro will continue its practice of unannounced inspections to ensure sufficient and timely progress is being made by Grimm's in the conversion to the ASP composting method. Metro will also continue to record and respond to complaints as appropriate.

4. The proposed license does not meet Metro code requirements:

- The license does not meet Metro Code 5.01.090(c) requirements because the words "groundwater" "pollution" "public health" and "nuisance odors" are missing.

Metro's response #4 - Metro Code requirements:

The Metro Code is accessible at oregonmetro.gov/metrocode.

Metro Code section 5.01.090(c) states, in part:

(c) 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.

The Metro Code does not require that a license contain any specific words. Rather, the Code simply requires that the license provisions, collectively, ensure that the solid waste facility will *operate* in a manner that avoids undue threats to the environment, avoids conditions that degrade public health and safety, and avoids nuisance conditions. This proposed license has several conditions that implement these performance goals, including, but not limited to, conditions within sections 3, 4, 5, 6, 7, 9, 10, and 13. With respect to this specific proposed license, the Office of Metro Attorney has concluded that the proposed license provisions comply with the requirements and with goals set forth in section 5.01.090(c) as described above.

In addition and as a further safeguard, Metro also requires that an applicant for a Metro solid waste license provide a "copy of all applications for necessary DEQ permits, any other information required by or submitted to DEQ, and a copy of any DEQ permits." (Metro Code 5.01.070(c)(2)). Finally, the applicant must provide Metro with "[a]ny current permit and a list of anticipated permits that a governmental agency may require." (Metro Code 5.01.070(6)). Metro requires all applicants to provide copies of these other applications and permits before authorizing a facility to operate to ensure that the applicant has addressed the health, safety and environmental requirements of any other government agencies that regulate the facility.

Once a license is issued, Metro will continue to independently monitor and enforces its own legal requirements, and also coordinate with other governmental agencies — including DEQ, special districts, cities, and counties — to ensure the licensee complies with other applicable governmental regulations

regarding environmental, health, safety and nuisance requirements. Moreover, Section 13.D1 of the proposed license requires that “[a]ny condition imposed on the facility’s operation by federal, state, regional or local governments or agencies having jurisdiction over the facility is deemed part of this license as if specifically set forth in the license.”

5. Environmental monitoring.

- Metro should require continuous, full time air monitoring. Some think this should be done by designated residents from the surrounding area, while others suggested Metro hire a third party contractor.
- Metro should monitor storm water and leachate, and require a monitoring plan during construction to convert to ASP system.
- Leachate capture system should never be allowed to overflow, and stronger storm water and groundwater controls at all times including during construction of ASP system.
- Dust monitoring and sampling equipment should be installed in surrounding areas and properties.
- Concern about chemicals used and contamination.

Metro response #5 – Environmental monitoring:

As stated previously, Metro’s current and near term focus at Grimm’s is on successful implementation of appropriate and timely operational changes which, if properly implemented, will result in fewer odors and other offsite impacts such as dust. As previously explained, it is premature to require the measurement of offsite odors and the use of a particular olfactometer to perform this task. Grimm’s is also regulated by DEQ which is responsible for ensuring that the facility complies with the state’s environmental requirements. Metro relies on DEQ and its agent, Clean Water Services, to monitor and enforce ground water, storm water, and air quality requirements at the site. Metro shared all of the public comments that it received with DEQ. Metro generally conducts more frequent inspections of Grimm’s and will continue to refer applicable matters to other agencies when appropriate.

6. Economic impacts:

- The proposed requirements will result in increased costs for residential and/or commercial customers of Grimm’s.
- Concern that increased costs will lead to illegal dumping of yard debris, or unsafe burning.
- Grimm’s provides economic benefit to the community as an employer and local recycling infrastructure.
- Concerns regarding decreased home values due to Grimm’s negative neighborhood impacts.
- Oregon Air offered to participate in community fundraising efforts to help finance its proposal to require Grimm’s to perform composting operation inside a building.

Metro Response #6 - Economic impacts:

With respect to rates, it is not Metro’s intent to cause any facility to close — including Grimm’s — due to regulation. Yard debris composting is valued as an important method to recover and recycle organic materials. Metro does not currently regulate rates that private facilities charge their customers. Metro has a strong interest in the success of the private sector at creating, expanding, preserving and broadening efforts that advance waste prevention, reuse, recycling and energy recovery. If the community or the facility engages in fundraising efforts, this activity is outside of the scope of the requirements of the Community Engagement Plan.

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

- Request that Metro provide improved complaint reporting system that simultaneously notifies all regulatory entities (Metro, DEQ, city of Tualatin) and Grimm's.
- It is not clear who to report odor and other complaints to and how to submit them.
- Citizen input being required for approval of both the initial Operating Plan and updates to the Operating Plan, and citizen representation required at all meetings between Metro and Grimm's.
- There is no mechanism for ongoing community input and there should be.
- Complaint records should be required to be kept for longer than one year.

Metro's response #7 – community involvement in regulation and enforcement:

As described above, Metro's current and near term focus at Grimm's is on successful implementation of appropriate and timely operational changes which, if properly implemented, will result in fewer odors and other offsite impacts such as dust.

Currently, complaints about any Metro regulated solid waste facility (including Grimm's) can be submitted to Metro in the following ways, listed in order of effectiveness:

1. oregonmetro.gov/facilitycomplaints
2. Email: SWICC@oregonmetro.gov
3. Call: 503-234-3000 Mon-Sat 8:30 a.m. to 5 p.m.

To stay current on Metro updates regarding Grimm's please visit: oregonmetro.gov/grimms.

Metro employs two full time solid waste facility inspectors that generally perform seven or eight inspections of each regulated facility each year. Metro performs an increased amount of both announced and un-announced facility inspections and complaint investigations in neighboring areas surrounding a facility when greater attention is needed due to operational issues or complaints. Metro will continue to evaluate and update its complaint management system and information sharing processes with government agencies.

The proposed license requires that Grimm's take additional steps to engage with the local community in a more proactive manner. In particular, the license requires Grimm's to develop a "Community Engagement Plan" to outline how it will engage nearby residents and businesses during the conversion of the site to aerated static pile composting and into the future.

Metro will continue to review and assess operating plans for effectiveness and retain approval authority. Metro will continue to meet with regulated entities, and invite public participation when appropriate. This includes, but is not limited to, public comment opportunities for new solid waste licenses and license renewals but does not normally include reviews of a facility's operations plan.

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

- Emissions from composting should be identified and monitored.
- Odors generated at Grimm's and/or dust are a health concern.
- Odors generated at Grimm's and/or dust are exaggerated by a small group of people and/or people who are new to the area.
- Existing material on-site is negatively impacting public and/or environmental health in the surrounding community (odors, bioaerosols, Volatile Organic Compounds, etc.)
- People opposing the license should be required to demonstrate harm, such as providing the number of days per year the odor is a problem, the exact boundary of the problem, who has been injured by odors requiring doctor's treatment, the extent and cost of treatment, etc.

- Require an impact study after conversion to ASP system complete.

Metro's response #8 – Health impacts of compost:

Metro relies on the Oregon Health Authority (OHA), and local health departments like Washington County Health Department, and DEQ to address health risks due to exposure to compost odors and/or dust. Metro does not have the staff expertise to monitor or evaluate health concerns near facilities.

The Oregon Health Authority, Washington County Public Health, and DEQ released a document titled: *Frequently Asked Questions about Grimm's Fuel Compost Facility*, and it is included as attachment E that provides some general information about compost and health impacts.

9. Comments describing odors:

- Odors coming from the facility are negatively impacting people near Grimm's and surrounding areas, including embarrassment, restricting outdoor activities and causing negative health impacts or leading to concern about the potential for negative health impacts.
- Odors occur but are not negatively impacting people near Grimm's and surrounding areas.
- Odor complaints are exaggerated from a small vocal minority and/or people new to the area.

Metro's response #9 - Odors:

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

CHANGES TO PROPOSED LICENSE IN RESPONSE TO PUBLIC COMMENT

In response to the feedback Metro received during the previous public comment period which commenced in October 2018, Metro revised the draft conditions that were initially released. This draft license is available on Metro's website at oregonmetro.gov/grimms, as of January 4, 2019. Metro made specific changes based on feedback which included:

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

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

Metro made a few additional changes to the proposed license based on comments received during the most recent public comment period, which commenced in January 2019. (See attachment F for a red-line

version of the license to see these changes in detail.) Metro revised the compost monitoring parameter for carbon to nitrogen ratio sampling to a measurement for finished compost rather than active composting. Metro also added a new operating plan condition that requires the facility to describe procedures it will use for achieving an ideal carbon to nitrogen ratio during pile construction and throughout the composting process. Additionally, Metro made some edits and non-substantive changes for improved accuracy and clarity. In conclusion, the proposed license significantly increases requirements from the license currently in place. Among other provisions, the proposed license will require Grimm's to:

- Limit the height of compost piles to no more than 25 feet by April 30, 2019, and no more than 14 feet by July 1, 2020
- Operate and maintain an aeration system for all active compost piles effective July 1, 2020
- Cover active aerobic composting piles
- Monitor and record oxygen and temperature levels and other monitoring parameters in compost piles
- Establish and implement a community engagement plan
- Establish and implement a compost operator training plan including continuing education for its employees

STAFF RECOMMENDATION

The proposed license renewal includes new provisions that requires Grimm's to significantly reduce compost pile sizes and implement the aerated static pile method of composting. Approval of the proposed license will renew Grimm's current authorizations for four years and ten months. The proposed license becomes effective on March 1, 2019, and will expire on December 31, 2023.

Attachments:

A: Timeline actions February 2017 – February 2019

B: Metro response to public comments, January 4, 2019

C: Public comments submitted to Metro Jan. – Feb. 2019

D: Grimm's Fuel Company response to public comments, February 22, 2019

E: Frequently Asked Questions about Grimm's Fuel Compost Facility, OHA, WA County, DEQ, January 2019

F: Red-line version of proposed license (License No. L-043-19_red-line), February 25, 2019

HR
Attachments
Queue

