Attachment A

Summary and response to comments to public notice for the draft solid waste permit for Grimm's Fuel company composting facility

Public Comment Period:
September 30, 2013 to November 20, 2013,
including public hearing on Oct. 30, 2013

The Oregon Department of Environmental Quality (DEQ) received 55 written comments, including one signed by 22 residents of the Pony Ridge subdivision. At the public hearing twenty people provided verbal comments and DEQ received two written comments. DEQ also received a document containing 453 signatures from people who are supportive of Grimm's composting permit.

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

Land Use:

Comment 1*: All of the conditional use permits are specific to tax lots 1800 and 1900. The DEQ permit covers both of these plus additional tax lots of 2000 and 2100. Lots 2000 and 2100 don't have CUP (conditional use permit) approval from the city, and the city shouldn't have given that impression, on the land use compatibility statement. (Joelle Davis, Oct. 30, 2013 and Nov. 20, 2103)*

DEQ Response: The proposed draft permit covers tax lots 1800 to 2100 to allow DEQ regulatory access over the entire site and operation, from the feedstock receiving area to that of the finished product, as well as the stormwater discharge area.

DEQ relies on local governments to make land use determinations and to verify land use approval when the local government signs a land use compatibility statement. DEQ received a completed Land Use Compatibility Statement (LUCS) from the City of Tualatin dated May 8, 2012 as part of Grimm's permit application. On September 30, 1997, the City of Tualatin received an application from Grimm's to review compliance with the conditions of Conditional Use Permit (CUP) 94-11. This documentation is under CUP-97-03. CUP-97-03 addresses surface water management requirements and clarifies the nature of the company's activities on the other properties. CUP 94-11 allows resource recovery yard debris recycling and composting on tax lots 1800 and 1900.

Comment 2: *The water quality treatment system was constructed on tax lot 2100 to be used for storage purposes starting in 1994, or sometime earlier. Composting activity was not supposed to take place on that lot. I have concerns that composting may actually be occurring today, based on our observations, aerial photos, and the fact that the water quality facility was built on that property and not on the 1800 and 1900 tax lots which are where the bulk of the composting activity seems to take place. I have concerns about the compatibility of these operations with the surrounding uses.* (Joelle Davis, Oct. 30, 2013 and Nov. 20, 2013)

DEQ Response: DEQ relies on the local planning jurisdiction to determine compatibility of the permitted activity with surrounding land uses. As part of DEQ's permitting process, DEQ requests a land use compatibility statement signed by the local planning jurisdiction. This process allows the planning jurisdiction an opportunity to review and address site activities that are occurring on the property. The City of Tualatin is responsible for land use decisions and DEQ relies upon their expertise to assure compatibility. Grimm's obtained an updated land use compatibility statement signed by the City of Tualatin on May 8, 2012. That land use compatibility statement references CUP-97-03 which takes into account activities occurring on tax lots 2000 and 2100 as well as tax lots 1800 and 1900.

Comment 3: Several people voiced concern that even though Grimm's has been here since 1975, the character of the surrounding neighborhood has changed. There are numerous businesses that have moved into the area. Several residential subdivisions have been built close by. They suggest that Grimm's should relocate to a more rural area.

> *Isn't it time for them to move altogether from this area, rather than requesting for an additional permit that will only worsen the situation for the children or the elderly? What is the reason they are staying here, only 50 families verses 500 families? (Hamid Rad, October 30, 2013)*
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> *I understand that Grimm's has been around for years but I also know that when it was originally located here, this was a rural environment. Our housing development was built just across OR99W from Grimm's around 1997 and there are now apartment complexes, other housing developments and several large buildings constructed for office space and manufacturing. Seven of these have been built in just the last few years. Unfortunately, most of these are currently sitting vacant. As the City has allowed this area of Tualatin to become more urbanized I feel that with the amount of odor emanating from Grimm's as well as other associated hazards that this is no longer a viable location for their process. I don't like the idea of a business closing or relocating but I can't help but feel that one of the reasons that these seven new facilities are now largely unoccupied is due to the odor produced from Grimm's. (John and Kathy Maher, Nov. 19, 2013)*
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> *My hope would be that this Grimm's facility would relocate to a more rural area as other excessive odor producing businesses have had to in other instances of urban expansion as I feel that it is unacceptable to have a facility like this so close to residential areas and professional business offices. I think it is appalling that a facility like this cannot be located near a school yet it is considered acceptable to have it near residential areas where individuals ranging from children to the elderly are exposed to the noxious odor and ill health effects twenty-four hours a day. (John and Kathy Maher, Nov. 19, 2013)*

These food composting activities should be done in less populated areas and not near homes and businesses. (FunTimeRVInc., Nov. 3, 2013, similar comment from Bob Pike, Nov. 7, 2013)

I have heard it said many times that Grimm's was here first, as if that should excuse all of the environmental, water quality, odor and dust concerns. The area around this operation has changed significantly since it began. Homes have been built, retirement facilities have been constructed, and a new business district has been created. All of these are negatively impacted by this operation, and it will only get worse if these new type 3 feedstocks are permitted. I understand that business owners in the Leveton district are unhappy with the ongoing odor problems, which currently hinder new development and will only deter business from locating in the area should the odors worsen from site expansion and/or type 3 feedstock processing- see the Class A office building sitting empty now for years. With the coming changes to transit on 99W, we expect to see great development opportunities open up along this area, but no one is going to want to develop and improve with the odor and dust they would be subjected to from this operation. It is my belief that the current and future use of this property is incompatible with the surrounding land uses, both current and future. (Joelle Davis, Oct. 30, 2013 and Nov. 20, 2013)

I understand the Tualatin City Council has approved this. Once again, they have demonstrated either lack of caring or do not have technical knowledge. The DEQ can't rely on the City Council to protect us. They haven't in the past and it looks like they aren't doing so again. (Elizabeth Piazza, Nov. 20, 2013)

DEQ Response: DEQ received a completed LUCS from the City of Tualatin dated May 8, 2012 as part of Grimm's permit application. DEQ relies on local governments to make land use determinations and to verify land use approval when the local government signs a land use compatibility statement. DEQ does not have jurisdiction over land use determinations to determine if an operation is no longer compatible with surrounding land uses. The local jurisdiction, the City of Tualatin, is responsible for land use planning decisions.

All compost facilities have some odors associated with them. Grimm's has been operating under an old permit that does not reflect new performance standards and requirements for compost facilities. The new DEQ permit requires Grimm's to comply with these performance standards including operating its composting processes and implementing best management practices that will minimize offsite odors. DEQ intends to issue the new permit to ensure that Grimm's meets these performance standards.

Comment 4: Several commenters voiced concern that the odors from Grimm's Fuel composting operations has diminished their property values.

The smell has degraded our quality of life in this beautiful community not to mention having a negative impact on our property values. (Pony Ridge Residents, Oct. 30, 2103)

Grimm's will have a monetary impact on the value of my home. No one is going to want to buy a house where it smells. (Virginia Green, Oct. 30, 2013)

The odors are having a negative impact on our property values, market values and the opportunity to lease property. Adding the Feedstock 3, as it's currently in the code, has raised all kinds of concerns about the impact on the property market value. I am unable to rent my home due to the smell so there is diminished value there. Who will compensate me for that diminished value when I go to sell my home? (Andy Stirling, Oct. 30, 2013)

We do not want a composting station in or near Tualatin that will diminish our investment. It will only become much worse, devaluing the property we own in the area. (Grace and Dave Cargni, Nov. 2, 201, similar comment from Virginia Green, Oct. 30, 2013 and Melvin Jackson, Gair Properties, LLC, Nov. 8, 2013)

Try to picture it if you and your family lived next to a cattle farm. Smelling manure all day or at least weekly is too much. We should have the right to live here in this area and not have to move because of the smell from Grimm's. Our homes in this area are valued anywhere from $245,000-$265,000. Our values will drop if this area becomes unlivable due to the smells coming from Grimm's. (Rocky and Cheryl Bixby, Nov. 19, 2013)

DEQ Response: DEQ relies on local planning agencies to determine if a business is compatible with surrounding land use and zoning requirements. The City of Tualatin is also responsible for growth in and around these types of businesses. Impacts on property values are not assessed by DEQ or under DEQ's regulatory authority.

All compost facilities have some odors associated with them. Grimm's has been operating under an old permit that does not reflect new performance standards and requirements for compost facilities. The new DEQ permit requires Grimm's to comply with these performance standards including operating its composting processes and implementing best management practices that will minimize offsite odors. DEQ intends to issue the new permit to ensure that Grimm's meets these performance standards.

Odor:

Comment 5: Several people commented that odors from Grimm's existing compost operations can be very strong and noxious. Several commenters requested that DEQ either shut down the existing compost operations or ensure that the existing compost operations be performed better so that there are no observable odors. Several commenters oppose any expansion of the current composting facility because the odors are bad now and will only get worse.

I have tolerated and tell any and all of our customers that complain that that's the way it is. Some days it can permeate so badly and the smell goes home with me in my nose. I oppose any approval of composting at Grimm's Fuel. (Stephen Scott, Funtime RV, Inc. Oct. 30, 2013)

The smell is awful. It smells like being next to the dump. It is very nasty for new customers. The smell is between an unsafe toxic odor and one that gags you. The

recreational vehicles arrive from the factory with that new RV smell but after a few times exposed to this odor, the RVs smell like used RVs. (Joel McKaig, Oct. 30, 2013; similar comment from Bob Hugh, Oct. 30, 2013)

It stinks, right now. Sometimes outside on a beautiful day, you can't be out there because, the air smells bad. (Virginia Green, Oct. 30, 2013)

Many times the odor becomes so overwhelming that we are forced to close our windows. The odor even seeps through closed windows. It was expected that Grimm's would have modified the operations and mitigated the odor emissions by now, but, regretfully, the problems still persists. The stink has restricted our outdoor activities. (Pony Ridge Residents, Oct. 30, 2013; similar comment from Virginia Green, Oct. 30, 2013, from Callie Loser, Oct. 30, 2013, Brett Hamilton, Oct. 30, 2013, and Mark Eberhart, Oct. 30, 2013)

Sometimes the odor is so nasty that we run to close the windows, and often we are not successful because it had already filled the house. (Ted Saedi, Oct. 30, 2013)

Odor has been a problem and there is concern that the odor is not yet under control. (Gene and ViAnn Austin, Nov. 9, 2013)

There have been no improvements to the odor issue since 1999. I have owned, lived for numbers of years, and developed my land for commercial use just across 99W from Grimm's Fuel since 1969, thirty years prior to their development in 1999. My water source was then and remains today from a domestic well on my property. The air source until 1999 was wonderful and normal. All the monitoring for compliance, including your changes in 2009 and 2013 has not been successful. (Jan Fourier, Nov. 19, 2013)

Our neighborhood is full of young children who are already affected by the current odor levels. It smells like dog poop. Just in the last three months, there have been weeks where the smell has been horrible four out of seven days. I can't fathom the smell getting any worse. (Emily Gonzalez, Oct. 30, 2013)

We are good neighbors to Grimm's and are expecting Grimm's to respect and value the quality of life of its neighbors. (Pony Ridge Residents, Oct. 30, 2013)

The odor has been a continuous problem. With only about 25% of all the subject property being used for composting, I can't imagine how much worse it will get with approval from DEQ to employ all tax lots, and then add type 3 feedstocks to the composting mix. (Joelle Davis, Nov. 20, 2013)

The draft DEQ composting Permit, for Grimm's Fuel should not be considered further as the draft permit does not include operating conditions and performance standards which are adequate to provide the necessary assurance to the community that odors will be minimized and retained within the boundaries of the property. OAR 340-96-0070, 0090, 0150. (Jan Giunta, Oct. 30, 2013)

If DEQ moves ahead with granting such a permit, DEQ should consider OAR 340-096-0150 (2) which allows for DEQ to require the facility to modify operations and otherwise implement all reasonable and practicable measures determined necessary by the Department to control and minimize adverse impacts of odors outside the boundaries of the facility. So if DEQ does issue a permit, then DEQ has the right and the obligation to the community to require Grimm's to modify its operations and implement all reasonable and practicable measures to minimize odor. (Jan Giunta, Oct. 30, 2013)

Grimm's Operation Plan should not be accepted by DEQ as the plan, Section 4 is inadequate to provide the necessary information and assurances that the composting facility will comply with required performance standards regarding odor emissions. Based on the approximate 100 complaints of odor emissions occurring beyond the facility boundaries in just the last two years, the present operation fails to meet the standard. The Plan continues the use of past failed practices, so DEQ and the community do not have the required assurance that the odor performance standard will be met in the future. Further though it is accepted best management practice to track wind direction and locate a specific cause for an isolated odor, neither of these activities constitute a viable odor minimization program. (Jan Giunta, Oct. 30, 2013)

The last paragraph of the risk assessment screening results letter is talking about Grimm's plan for odor control. This plan must be easily accessible to the public and I am hoping that the plan is a fundamental change to the processing technique and goes beyond monitoring wind direction. (Ted Saedi, Oct. 30, 2013)

The City has not received an odor minimization plan, despite the increase in complaints about the odor. One would think that the owner would not wait until feedstock approval was granted, but would proactively work to reduce odors TODAY, with the current compost mix. (Joelle Davis, Nov. 20, 2013)

DEQ Response: DEQ regulations require composting facilities to implement measures and methods to control and minimize adverse odor impacts outside facility boundaries. DEQ recognizes that composting is not an odor free operation and that a properly managed composting operation will have odors. Here are the rule requirements that Grimm's must comply with:

OAR 340-096-0070(4) All composting facilities must be designed, constructed, and operated in a manner that, to the greatest extent practicable, consistent with proper facility design and operation, controls and minimizes odors that are likely to cause adverse impacts outside the boundaries of the facility.

OAR 340-096-0090(1) requires that the permittee submit and DEQ approve an operations plan. OAR 340-096-0090(1)(d) Odor control. The Operations Plan must describe the methods and procedures the facility will use to comply with OAR 340-096-0070(4) and with 340-096-0150: Odors.

OAR 340-096-0150(1) The department recognizes that the microbial metabolic activity in composting piles and anaerobic digestion operations causes odors, and that composting facilities cannot completely eliminate all odors. All composting facilities must be designed, constructed, and operated in manner that, to the greatest extent practicable consistent with proper facility design and operation, controls and minimizes odors that are likely to cause adverse impacts outside the boundaries of the facility.

OAR 340-096-0150(2): The department may require a facility to prepare an Odor Minimization Plan under section (5) of this rule, and may further require the facility to modify operations and otherwise implement all reasonable and

practicable measures determined necessary by the department to control and minimize adverse impacts of odors outside the boundaries of the facility. In deciding whether to require an Odor Management Plan, the department will consider the frequency, duration, strength and intensity of odors; the number and frequency of complaints; and the number of people impacted.

According to OAR 340-096-0150(5), An odor minimization plan must include:
(a) A management plan for malodorous feedstocks;
(b) Procedures for receiving and recording odor complaints, immediately investigating any odor complaints to determine the cause of odor emissions, and promptly remedying any odor at the facility that does not meet the performance standards under OAR 340-096-0070(4);
(c) Additional odor-minimizing measures, which may include the following:
(A) Avoidance of anaerobic conditions in processes that are designed for aerobic composting;
(B) Use of mixing for favorable composting conditions;
(C) Formation of windrow or other composting piles into a size and shape favorable to minimizing odors;
(D) Use of end-product compost as cover to act as a filter during early stages of composting;
(E) Specification of a readily available supply of bulking agents, additives or odor control agents;
(F) Procedures for avoiding delay in processing and managing feedstocks during all weather conditions; and
(G) Methods for taking into consideration the following factors prior to turning or moving composting material:
(i) Time of day;
(ii) Wind direction;
(iii) Percent moisture;
(iv) Estimated odor potential; and
(v) Degree of maturity.

The new permit includes these new performance standards and gives DEQ the ability to enforce composting rule requirements regarding composting operations and odor controls. There are many components to the composting process that, if not operated properly, can create upset conditions generating odors. In response to the concerns noted in these comments, DEQ has modified the permit to require that Grimm's submit an updated operations plan identifying how the performance standards in these rules will be met. As part of that updated operations plan, DEQ is requiring that Grimm's Fuel develop and implement a compost pile height reduction plan as well as an updated odor minimization plan. The new permit conditions are:

4.3	**Updated Operations Plan**	Within 60 days of permit issuance, the permittee must update the Operations Plan and include a revised Odor Minimization Plan, and submit the updated plans for DEQ review and approval. Reference: Permit conditions 4.4 and 4.5
4.4	**Compost pile height reduction plan**	As part of the updated Operations Plan required under permit condition 4.3, the permittee must submit a plan identifying measures to reduce active compost pile heights at or below 30 feet. The plan must include sufficient details describing the measures the permittee will implement to reduce pile heights **by September 30, 2014** and must include methods to monitor and measure the pile to ensure the height is maintained at or below 30 feet. The permittee must maintain compost pile heights at or below 30 feet on an ongoing basis unless otherwise allowed or restricted by DEQ based on necessary composting parameters and compliance with the Performance Standards under OAR 340-096-0070. Reference: Permit condition 1.4

4.5	**Odor Minimization Plan**	As part of the updated Operations Plan required in condition 4.3, the permittee must prepare a revised Odor Minimization Plan that identifies how the permittee will modify operations to control and minimize adverse impacts of odors outside the boundaries of the facility. The odor minimization plan must include: A. A management plan for how malodorous feedstocks will be accepted, ground and incorporated into the composting piles as soon as practicable within the same day received; B. Procedures for receiving and recording odor complaints, immediately investigating any odor complaints to determine the cause of odor emissions, and promptly remedying any odor at the facility that does not meet the performance standards under OAR 340-096-0070(4); C. Additional odor-minimizing measures, including the following: i. Avoidance of anaerobic conditions in the composting processes; ii. Use of mixing for favorable composting conditions; iii. Formation of windrow or other composting piles into a size and shape favorable to minimizing odors; iv. Use of end-product compost as cover to act as a filter during early stages of composting; v. Specification of a readily available supply of bulking agents, additives or odor control agents; vi. Procedures for avoiding delay in processing and managing feedstocks during all weather conditions; and D. Methods for taking into consideration the following factors prior to turning or moving composting material: i. Time of day; ii. Wind direction; iii. Percent moisture; iv. Estimated odor potential; and v. Degree of maturity. Reference: OAR 340-096-0150(5)
4.6	**Odor Minimization Plan implementation**	The permittee must implement the Odor Minimization Plan upon DEQ approval.
4.7	**Updated Odor Minimization Plan**	The permittee must review and update the Odor Minimization Plan as needed to reflect changing conditions or upon DEQ request. The updated plan must be submitted to DEQ for review and approval.

The DEQ solid waste permit also requires that Grimm's respond to complaints in permit condition 9.15:

9.15 Complaints

The permittee must attempt to resolve all complaints it receives regarding facility operations by doing the following:

- Contact the complainant within 24 hours to discuss the problem;
- Keep a record of the complaint, name and phone number of the complainant (when possible), date complaint was received and date of, and response by, the facility operator; and
- Immediately initiate procedures at the facility, when possible, to resolve the problem identified by the complainant.

For odor, litter or dust complaints, the permittee must report to DEQ as soon as complaints are received at the facility from five (5) different businesses and/or individuals about a given event or if an odor event lasts longer than 24 hours without resolution or mitigation.

DEQ will inspect and evaluate Grimm's composting operations to ensure compliance with DEQ's composting requirements. As necessary, DEQ will require facility improvements to address documented operational concerns and compliance issues.

Composting method:

Comment 6: Commenters requested that DEQ require Grimm's to use a different composting process such as an anaerobic digester or covered windrows with forced air similar to the process used at Nature's Needs.

> *The composting process of open air, pile it high does not work now to control or reduce odors as evidence by the hundred complaints in the last two years. As our homes are only 350 yards from Grimm's facility, a proven composting system which truly minimizes odors must be used by Grimm's. Grimm's, in order to be a good neighbor, must alter the composting process of a large-pile method. Grimm's must adopt the current best practices, such as anaerobic digester or covered windrows with forced-air similar to that used by Nature's Needs in North Plains. (Pony Ridge Residents, Oct. 30, 2013)*
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> *A modern composting method needs to be requested where compost piles are located so close to the residents. (Ted Saedi, Oct. 30, 2013)*
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> *The present use of large pile composting processes and the use of a Caterpillar D-9 do not constitute measures and operations which meet the standards of this section as evidenced by the continued odor emissions beyond facility boundaries over the last two years. Until Grimm's changes its big pile process and the primary aeration system of a D-9, odor emissions beyond the facility boundaries will continue. (Jan Giunta, Oct. 30, 2013)*
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> *What I question in the existing permit, is the use of Type 3 feedstocks. And I object to a permit that would allow that just through modification of the operating plan as opposed to looking at the technology involved. EPA has a best management practices guidance document that talks about methods for composting food waste. They are basically forced-air piles or turned windrows, neither of which technique I think is done at Grimm's now. I did read the draft permit and operating plan and EPA recommends keeping track of particle size, oxygen, moisture, carbon-to-nitrogen ratio and temperature. I really only saw discussion of temperature in the operating plan. (Chad Darby, Oct. 30, 2013)*
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> *-Washington County Citizen Action Network is supportive of neighbors who are objecting to an expansion of Grimm's permit. There are better solutions than just ongoing expansions of big, smelly, offensive projects in your own neighborhood. There are other ways we could be handling solid wastes. We could be doing it anaerobically. We could be doing it on a distributed basis instead of hauling all of it off to one great big place and compounding the air problems and the water problems and the soil problems for the people who have to be near that one big place. Some of these ideas are way outside the framework of what's currently our regulatory system, but people working together can, over time, influence what those regulatory systems provide. I invite you to join with us*

and some of the things that we can do together to bring about change that really will protect our environment, will protect our health and will protect our quality of life in ways that the current regulatory structure doesn't seem to be quite doing. (Linda Peters, Oct. 30, 2013)

DEQ Response: DEQ rules do not identify the type of composting required to meet the regulatory performance standards. There are many different composting methods used around the state and one method is not necessarily better than the other. A composter may use static piles, aerated windrows, anaerobic digestion or other composting techniques as long as the composting operation meets performance standards. DEQ compost rules establish performance standards that composting operations must meet. Ultimately, it is the composting facility's responsibility to demonstrate to DEQ that operations meet applicable requirements. If DEQ determines and documents that a facility's methods are not meeting performance standards including controlling and minimizing odor adverse impacts, DEQ will require the facility to implement necessary changes.

As discussed above, DEQ has modified the permit to require an updated operations plan, an odor minimization plan, and is requiring a phased in approach to accepting residential food waste feedstocks. Please see the responses to comments #5 and #7.

Feedstocks:

***Comment 7*:** DEQ received a substantial number of comments opposing acceptance of food waste (Type 3 feedstocks) due to odor concerns.

Grimm's produces a terrible, sickening smell from their operation as it exists now. They should not be allowed to process rotten food. (Bob Barnes, Oct. 30, 2013)

The possibility of adding Type 3 feedstocks is really concerning, now or in the future. If we increase the kinds of feedstocks that includes dead animals, that makes me really concerned. (Virginia Green, Oct. 30, 2013; similar comment from John Fettig, Oct. 30, 2013)

It seems like vegetative matter has a certain type of effect or level, but once you add lipids or fats from animal product, meat, fat, other organics that would come from Type 3 feedstocks, I think the odor level would go up and I don't think it should. (Mark Eberhart, Oct. 30, 2013)

Until Grimm's updates it composting process, they should not be allowed to receive Type 3 residential feedstocks. Our community does not need to go through the same experience as the North Plains community did in 2012-2013. Grimm's needs to fix the current odor problem before accepting Type 3 feedstocks. The allowance of Type 3 feedstocks should be deleted from this proposed permit, as Grimm's has yet to resolve their repeated current odor problems with the current permit for Type 1 and Type 2 feedstocks. (Pony Ridge Residents, Oct. 30, 2013; similar comment from Ted Saedi, Oct. 30, 201, Cliff Herbison, Oct. 30, 2013; Cindy Phillips, Oct. 30, 2013 and Aracely Drlik, Oct. 30, 2013)

I can't fathom the smell getting any worse from a compost pile that contains Type 3 feedstock, which includes meat and dairy food waste and dead animals. (Emily Gonzalez, Oct. 30, 2013; similar comment from Cindy Phillips, Oct. 30, 2013))

Under no conditions should Grimm's be allowed to accept commercial Type 3 feedstocks. Based on the number of odor complaints in the last 2 years and the reality that the present composting process does not control odors as required by the State of Oregon performance standards for composters, that Grimm's should not be allowed to receive type 3 residential feedstocks. (Jan Giunta, Oct. 30, 2013; Pony Ridge Residents, Oct. 30, 2013, Kat Taylor, Nov. 19, 2013)

It will only get worse if they are allowed to bring in composting from Portland. I am totally opposed of permitting any Type 3 feedstocks. (similar comment from Jan Fourier, Nov. 19, 2013, Elizabeth Piazza, Nov. 20, 2013)

We will be infested with flies, beyond our imagination, if food waste is allowed to be recycled in our city. (FunTimeRVInc, Nov. 3, 2013)

North Plains citizens are dealing with this very issue and we do not want to take on this nightmare. Didn't you learn anything from what happened in North Plains? These food composting activities should be done in less populated areas and not near homes and businesses. (Kat Taylor, Nov. 19, 2013, Elizabeth Piazza, Nov. 20, 2013)

Why in the world would you allow something like food waste to be processed near homes, care facilities, and other businesses? (Elizabeth Piazza, Nov. 20, 2013; similar comment from Annie Vigileos, Nov. 18, 2103)

I understand the permit will be awarded but I am hopeful that the conditions of the permit are such that it would be impossible for this facility to expand. (John and Kathy Maher, Nov. 19, 2013)

It is of great concern that Grimm's Fuel be allowed to compost Type 3 feedstocks without greater regulations. Allowing noxious odors can affect the health and well being of our employees and would have an impact on our ability to retain and hire employees. (Theo Treske, Oct. 30, 2013)

If you do permit this activity to occur with this Type 3 food waste, then please make sure that there's checkpoints involved where citizen comment is taken and considered, and so that we have the opportunity to come and talk about our experiences, if they're not complying with their permit. Please don't let this facility accept Type 3 food waste. It's not appropriate for this location or this facility. (Andy Stirling, Oct. 30, 2013)

Please do not allow dead animal and food waste composting. This poses a hazard to groundwater and surface water, can jeopardize the health of domestic livestock, wildlife and pets in addition to the horrible smells that we already detect a mile away. (Toni Anderson, Nov. 2, 2013; similar comment from Melvin Jackson, Gair Properties, Nov. 8, 2013; Ginnie Pearsall, Gair Properties LLC, Nov. 18, 2013)

This reminds me of the Redland dump when I-205 was new. I used to drive by it, try to hold my breath, but the smell would still be in my nose for hours afterward. I'm concerned this will pollute our town for years to come. (Toni Anderson, Oct. 30, 2013)

DEQ Response: Grimm's received land use approval to accept Type 3 feedstocks, specifically residential food waste, through a conditional use permit from the City of Tualatin. After receiving land use approval, Grimm's updated their DEQ permit application to seek authorization to accept residential food waste. Grimm's also updated their operations plan providing information to DEQ on how residential food waste would be accepted, handled and processed. After reviewing the comments received, DEQ has modified the compost permit to require that Grimm's demonstrate compliance with performance standards and update their composting operations showing how they will reduce odor impacts outside the boundaries of their facility. Please see the response to comment #5 above.

In addition, DEQ will modify the permit to clarify that the only Type 3 feedstock that is authorized is residential food waste mixed with yard debris.

Grimm's did not request authorization to accept dead animals (a Type 3 feedstock) in this DEQ permitting process. Based on the public concerns regarding the potential for Grimm's to accept dead animals, DEQ has included a permit condition prohibiting the acceptance of dead animals.

DEQ has also modified the permit to require that Grimm's phase in composting of Type 3 feedstocks by starting with a small amount of residential food waste, up to 200 tons per month and complete a demonstration project documenting that composting of residential food waste can be done in a manner verifying compliance with the performance standards prior to expanding and demonstrate that following permit conditions. Permit language that is underlined indicates new permit language and language with a strikethrough ~~strikethrough~~ indicates deleted permit language.

1.1	**In this section**	This section describes the activities the permittee is authorized to conduct, including: • Authorization to receive ~~specific types of~~ Types 1-3 feedstocks; • Criteria for residential food waste authorization; • Residential food waste demonstration project; • Authorization to receive other feedstocks or amendments; • Authorization of other activities; and • Water quality activities.

1.2 Authorization to receive Types 1 – 3 feedstocks

This permit authorizes the facility to accept the following feedstocks (Note: a detailed list of authorized feedstocks is listed in the Department-approved Operations Plan for this site.):

A. Types 1 and 2 Feedstocks are authorized to be accepted at this facility.

~~B.~~ The only Type 3 feedstocks authorized to be accepted at this facility is curbside collected residential food waste mixed with yard debris. Type 3 Feedstocks cannot be accepted unless Grimm's receives prior written approval from DEQ. ~~and only after Grimm's Fuel Company obtains a Metro franchise agreement as part of an approved organics collection program. If the permittee receives these approvals, then Type 3 feedstocks may be used to meet up to 25% of the composting volume. .~~

Reference: Permit conditions 1.3, 1.4, 2.2and 3.2

1.3 Criteria for residential food waste authorization

The permittee must complete the following prior to receiving DEQ written approval to accept residential food waste:

A. Facility compost operations must be in compliance with the permit conditions and applicable compost regulations;
B. Submit updated Operations Plans for DEQ review and approval. The updated plan must address the demonstration project requirements in permit section 1.4 and the following:
   i. accepting, managing and processing residential food waste;
   ii. incorporating incoming residential food waste in a timely manner into compost piles to control and minimize odors and prevent vectors;
   iii. implementing additional odor control measures to control and minimize odors from the acceptance and management of residential food waste;
   iv. monitoring compost piles for oxygen, C:N ratio, moisture content, and other necessary composting parameters;
   v. formation of compost piles to prevent anaerobic conditions including maintaining pile heights at or below 30 feet;
   vi. leachate management including preventing formation of leachate puddles, reducing leachate generation, leachate collection and odor controls for leachate collection and spray system;
   vii. monitoring pile and weather conditions prior to turning piles to control and minimize odors and dust; and
   viii. recordkeeping to track and monitor incoming residential food waste tonnage.
C. Submit facility complaint records and facility response for the last six months prior to date of submittal; and
D. Submit documentation indicating the permittee has written approval from Metro to accept residential food waste.

Reference: Permit conditions 1.2, 1.4 and 4.4

1.4 Residential food waste demonstration project

The permittee must demonstrate an effective and efficient compost operation for residential food wastes that complies with the conditions of this permit and applicable DEQ regulations by conducting a demonstration project with DEQ approval.

A. Prior to initiating the demonstration project of residential curbside collected composting program, the permittee must prepare an updated Operations Plan explaining how residential food waste mixed with yard debris will be accepted, incorporated into the composting process, and how the composting process will be conducted and evaluated to ensure compliance with the Performance Standards under OAR 340-096-0070.

B. The permittee may accept up to **200 tons per month** of residential food waste at the facility during the demonstration project unless DEQ otherwise approves or restricts.

C. Prior to increasing the amount of residential food waste that may be accepted, the permittee must submit to DEQ for review and approval a written report evaluating the demonstration project. The permittee may submit the written report after accepting and composting residential food waste for at least 90 days.

D. The written evaluation report must include, at a minimum:
   i. a summary of the residential food waste compost operations;
   ii. a summary of the wastes accepted for the compost operations;
   iii. a summary of how the incoming wastes are incorporated in a timely manner to control and minimize odors;
   iv. an evaluation of the effectiveness of the composting method for properly managing residential food wastes including but not limited to odors, anaerobic conditions, leachate prevention and management, dust control and vectors;
   v. a description of any problems encountered and measures taken to address and resolve the problems;
   vi. verification that acceptance, sorting, grinding, storage and transport to and from the site are conducted in a manner to prevent offsite dust, odors or runoff problems. Verification may include submittals of daily logs verifying that the site has been swept and watered, all complaints addressed, and photo documentation of operations;
   vii. any recommended changes to the Operations Plan or composting method to address operations problems encountered; and
   viii. a detailed request documenting effective and sufficient operations to allow for an increase in residential food waste tonnage.

E. DEQ will evaluate the written report and facility operation to determine if operations are being conducted to successfully demonstrate compliance with DEQ rules and permit requirements including meeting performance standards of condition 3.2 regarding control of dust, odors, runoff or other water pollution concerns. If DEQ determines that performance standards are being met, DEQ may authorize an increase in the amount of residential food waste accepted by the permittee. DEQ may require that the demonstration project continue with this increased amount of residential food waste and require a new written evaluation per 1.4 D. above.

F. The demonstration project timeframe is 180 days unless DEQ in writing requires a continued demonstration project phase, determines that residential food waste cannot be accepted or approves acceptance of food waste on an ongoing basis.

G. The permittee may not expand the residential food waste operations beyond the demonstration project without written approval of DEQ.

Reference: Permit conditions 1.2, 1.3, 2.2 and 3.2

1.~~3~~5	**Authorization to receive other feedstocks or amendments**	Feedstocks or amendments excluded from the above authorization may not be accepted unless DEQ has approved in writing an updated site Operations Plan which describes the new feedstocks or amendments~~ as well as the procedures to make sure that Type 3 feedstocks remain below 25% of composting volume~~. DEQ may require a demonstration project similar to that identified in conditions 1.3 and 1.4 above prior to allowing acceptance of additional feedstocks.

2.2 Prohibited feedstocks or wastes

The permittee is prohibited from accepting materials for composting that are not specifically authorized in Section 1.2 of this permit, unless the materials have been approved in accordance with the requirements of Section ~~1.3~~ 1.5 of this permit.

The permittee must not accept dead animals at the facility.

The permittee must not accept any wood waste that does not meet the definition of wood waste in OAR 340-093-0030.

The permittee must not accept unsorted, mixed domestic solid waste as a feedstock or for disposal at the composting facility.

The permittee must not accept any materials that are listed in OAR 340-093-0040, as prohibited from disposal at solid waste disposal sites, including but not limited to hazardous waste as defined in ORS 466.005 and OAR 340, Division 101.

Comment 8: *Metro recommends that DEQ withhold its conditional inclusion of Type 3 feedstocks. Granting such premature approval of Type 3 feedstock would indicate that Grimm's Fuel has already submitted acceptable facility design plans and operating procedures to the DEQ (and Metro) that fully address management of these feedstocks. However, it is Metro's understanding that Grimm's Fuel has not developed nor submitted such plans to DEQ (and has not submitted such plans to Metro). In addition, no local jurisdictions in Washington County are currently planning to implement a residential food waste and yard debris collection program in the near future.*

Metro supports a permit renewal for Grimm's Fuel which does not include the Type 3 feedstocks, even if restricted to residentially generated food scraps mixed with yard debris. Rather, the DEQ should require the facility to apply for a future permit modification and provide the public with an opportunity to comment at that time. It is important that Grimm's Fuel develop and submit a satisfactory facility design and operating plan for managing any Type 3 feedstock when that type of feedstock is more likely to be available.

It is important for Metro and DEQ to be consistent in both timing and substance when issuing authorizations for facilities to manage new materials, especially feedstocks, such as food waste that present additional operational and processing challenges. (Scott Robinson, Metro, Nov. 12, 2013)

DEQ Response: DEQ agrees that Grimm's must demonstrate that composting food waste can be done so in compliance with regulatory performance standards. To address the concerns that DEQ has heard during the public comment period, DEQ has modified the proposed permit to require that Grimm's provide an updated operations plan including an updated odor minimization plan. DEQ has modified the permit to prevent acceptance of commercial food waste and dead animals. DEQ has added a permit condition that requires that Grimm's conduct a demonstration project and phase in acceptance and composting of residential food waste. Prior to initiating the demonstration project, Grimm's must meet several requirements as identified in the modified condition 1.4. One of the requirements is that Grimm's must submit documentation indicating written approval from Metro to accept residential food waste. Please see DEQ's response to comment #7 above.

DEQ agrees that Metro and DEQ must work cooperatively together when issuing authorizations for facilities to manage new materials and weighs that effort in making final determinations regarding permit issuance. In this case, DEQ considers the additional permit conditions to address the concerns Metro has raised about ensuring that Grimm's has the capability to operate its compost facility effectively currently and as Grimm's considers adding in food waste to the composting process. If needed, DEQ can modify the permit to address timing or substance issues related to managing new feedstocks, and the need for additional operational controls and parameters.

Comment 9*: The public should be informed and granted a public comment period if Grimm's Fuel makes the decision to accept Class A sewage sludge for composting at this facility. If the company goes ahead to seek a permit for non-Class A sewage sludge, DEQ must do much more robust public outreach to discuss the concern. (Cassie Cohen, Nov. 16, 2013)*

DEQ Response: Grimm's has not asked to accept sewage sludge. DEQ has modified permit condition 2.5 to require a permit modification if Grimm's desires to accept any type of sewage sludge. In addition, Grimm's would be required to apply for the applicable water quality permit. As part of any permit modification to allow acceptance of sewage sludge, DEQ would conduct a public involvement effort including at least a formal public comment period for such a permit modification. Permit language that is underlined indicates new permit language and language with a strike through ~~strikethrough~~ indicates deleted permit language.-The revised language is:

2.5	**Sewage sludge (biosolids)**	The permittee must not accept any sewage sludge for composting at this facility~~, except Class A exceptional quality biosolids~~. If the permittee wishes to accept sewage sludge, ~~other than Class A exceptional quality biosolids,~~ then the permittee must request a permit modification of this solid waste permit and obtain the applicable water quality permit, ~~in lieu of this solid waste permit,~~ as required under ORS 468B and OAR 340-050.

Permit Conditions:

Comment 10: Commenters felt that a 10 year permit is too long.

> *The proposed time period of ten years is not acceptable without public comment periods built into it at critical junctures. (Pony Ridge Residents, Oct. 30, 2013)*
>
> *I don't think the permit should be granted period, but granting it for a 10 year period is ridiculous. (Annie Vigileos, Nov. 18, 2013)*
>
> *A ten year period is excessive. I recommend a trial period of only two years in order to assess conformance with the required performance standards. (Jan Giunta, Oct. 30, 2013)*

DEQ Response: Oregon law, Oregon Revised Statute (ORS) 459.245 authorizes DEQ to issue composting permits for a period up to ten years. DEQ intends to issue this permit for the maximum ten year time period. DEQ may initiate modifications to a permit at any time to include new regulatory changes or other conditions as appropriate. DEQ has modified the permit to require an updated operations plan and an updated odor minimization plan, as well as a demonstration project for acceptance of residential food waste feedstocks to make sure that if Grimm's accepts residential food waste, the facility can do so in a way that demonstrates compliance with performance standards. DEQ has also specifically identified in the permit the performance standards that compost facilities need to meet by rule. Permit language that is underlined indicates new permit language and language with a strike through ~~strikethrough~~ indicates deleted permit language.-Revised permit condition 3.2:

3.2 Performance Standards

The composting facility must be operated in conformance with the performance standards identified in OAR 340-096-0070:

(1) All composting facilities must be designed, constructed, and operated in a manner that does not cause a discharge of leachate, liquid digestate, or stormwater from the facility to surface water, except when such discharge is in compliance with a discharge permit issued by the department.

(2) All composting facilities that collect and dispose of leachate, liquid digestate, or stormwater in engineered structures must comply with the applicable requirements of OAR 340-096-0130: Special Rules Pertaining to Composting: Biogas, Liquid Digestate and Leachate Collection Design and Management Requirements.

(3) All composting facilities must be designed, constructed, and operated in a manner that does not cause a likely adverse impact to groundwater under OAR 340 Division 40. All composting facilities proposing to use infiltration in soil as a method for managing leachate, liquid digestate, or stormwater must comply with OAR 340-096-0120: Groundwater Protection.

(4) All composting facilities must be designed, constructed, and operated in a manner that, to the greatest extent practicable, consistent with proper facility design and operation, controls and minimizes odors that are likely to cause adverse impacts outside the boundaries of the facility.

(5) All composting facilities must be designed, constructed, and operated in a manner that achieves human pathogen reduction as required by OAR 340-096-0140: Pathogen Reduction.

(6) All composting facilities must be designed, constructed, and operated in a manner that controls (6) All composting facilities must be designed, constructed, and operated in a manner that controls or prevents propagation, harborage, or attraction of vectors, including but not limited to rats, birds, and flies.

(7) All composting facilities that produce, collect or store biogas must be designed, constructed, and operated to meet state and local fire regulations to address the potential for fire and explosions.

(8) All composting facilities that collect, store and manage liquid digestate must demonstrate adequate capacity to store or remove the digestate. For facilities that land apply, storage must be provided for periods when the production of liquid digestate exceeds the capacity of the soil to use the digestate at agronomic rates including during wet winter months.

(9) All composting facilities must comply with all other applicable laws and regulations.

Comment 11*: Paragraph 9.15 is mandating Grimm's to report if complaints for every incident where odor last for 24 hours. I think every complaint, for every event that lasts more than two hours deserves reporting to DEQ. (Ted Saedi, Oct. 30, 2013)*

DEQ Response: This permit condition captures rule language from OAR 340-096-0150 which requires a permittee to notify DEQ when odor, dust or litter complaints are received from five different businesses or individuals for a particular incident or if an odor incident lasts longer than 24 hours without resolution or mitigation. The permit also contains a condition that Grimm's maintain a complaints log for each complaint received regardless of the duration of the odor event or other event that triggers the complaint. In the complaints log, Grimm's must document the steps taken to address the complaints. DEQ will review the complaints log during periodic inspections. In addition, citizens may file a complaint with DEQ through the DEQ complaints intake system. DEQ forwards complaints about permitted facilities to the permittee to address and the complaints must be captured in the permit required complaint log. DEQ also will follow up on complaints that DEQ receives.

When DEQ receives odor complaints about a DEQ permitted facility, DEQ will independently seek to verify odor sources. DEQ will evaluate whether to apply its nuisance odor strategy. DEQ will ask the complainant to provide detailed information about the odor in a telephone interview or through the submission of an Odor Intake form. DEQ does not assume that a permittee is in violation based solely on the existence of complaints. DEQ will apply a progressive evaluation of odor complaints that seeks to identify odor sources and evaluate whether the source of odors is doing what is required by rules and permits. If this is the case, then DEQ will first seek to resolve ongoing odors through cooperative voluntary remedies prior to moving to an enforcement strategy.

More information on how to make an environmental complaint can be found at this link:

http://www.deq.state.or.us/complaints/rep.htm

More information on DEQ's nuisance strategy can be found at this link:

http://www.deq.state.or.us/programs/enforcement/docs/complaints/NOSfs.pdf

Comment 12: *Concerning the 25% volume of compost, I suggest the draft to be modified to start from say, 10%. (Ata (Ted) Saedi, Oct. 31, 2013)*

DEQ Response: DEQ has modified the conditions of Section 1 to require a demonstration project for the acceptance of residential food waste. The volume limitation has been removed altogether because the rules require that the facility must meet performance standards. Achieving performance standards will dictate how much of a particular feedstock type a facility can accept.

See the modified permit conditions in the response to comment # 7 above.

Complaints Reporting and Monitoring:

Comment 13: Several people commented that they were unaware of DEQ's complaints intake system and how to make an environmental complaint. Others felt that they should not have to make complaints but instead DEQ should be actively verifying compliance.

Nobody knew that there was a reporting system in place, nobody knew what to do. I didn't know there was a way to get a complaint registered. (Emily Gonzalez, Oct. 30, 2013; similar comment from Andy Stirling, Oct.30, 2013)

Many residents learned of the reporting process in 2011, which is why there has been an uptick in complaints. Many residents rely on a few individuals to make those complaints on behalf of their neighborhoods, as we all have busy lives and cannot spend every day on the phone with regulatory authorities. (Joelle Davis, Nov. 20, 2013)

Why should we, as homeowners or business owners, have to be the vigilant ones who have DEQ on speed dial? If the odors spoil a special occasion back yard party, what good will a call do then? The damage will already have been done. Does DEQ rely solely on complaint based reports to know if one suspects lack of compliance, or will DEQ regularly monitor the facility? (Jonathan Crane, Oct. 31, 2013)

I want to submit about 52 complaints. I'd like these entered into the record. (Jan Giunta, Oct. 30, 2013)

DEQ Response: DEQ recommends that people who observe odors or offsite dust file complaints directly with a permitted facility as well as to DEQ. The DEQ solid waste permit requires that the permittee investigate any complaint that the permittee receives, keep a log and identify what action is taken in response to the complaint. Reporting complaints directly to the facility requires the operator to log and address the reported concerns quickly. In addition, DEQ takes complaints about facilities. DEQ may refer a complaint to a permitted facility for follow up or may determine that DEQ needs to investigate the complaint. DEQ tracks complaints and uses the complaint information to determine if DEQ needs to take additional action regarding a facility such as conducting more frequent inspections, requiring a facility to undertake additional best management practices, or requiring a facility to undertake additional controls. If the complaints are about odors, DEQ will evaluate and determine whether to initiate DEQ's nuisance strategy to address the odors. In addition to complaint response, DEQ conducts regular inspections at permitted facilities. Please also see the response to comment #11 above.

***Comment 14**: The results of Grimm's testing and inspections should be easily accessible to the public. The odor control plan should be easily accessible to the public also.*

DEQ Response: Testing results, inspection reports, the operations plan and other information in DEQ files are public records and can be accessed through a public records request. For information about the public records request process or to request records, please see the following DEQ webpage; http://www.deq.state.or.us/records/recordsRequestFAQ.htm .

Air Quality:

***Comment 15**:* Several commenters requested that DEQ require an air quality permit of this compost facility to address air emissions and toxic air pollutants.

Washington Department of Ecology requires air permits for food waste composting facilities. They recently did a study of composting facilities on the east side and west side of the state and what they found was that in the wetter climate there are significantly more hazardous air pollutants emitted from food waste composting facilities. From their study there was one facility that emitted over eleven tons of acetaldehyde emissions, in addition to formaldehyde, benzene, and other compounds, as well as odor-causing compounds. That would require an air quality permit in the State of Oregon. Under OAR 340-216-0020, Air Contaminant Discharge Permits, Tables 1 & 2, it talks about types of facilities that require air permits. There is a category for facilities that have the potential to emit more than 10 tons of a single hazardous air pollutant and one for "all other sources not listed herein that DEQ determines an air quality concern exists or one which would emit significant malodorous emissions. Both of those would trigger air permitting. What is Oregon doing about air permitting if Type 3 feedstocks are allowed? (Chad Darby, Oct. 30, 2013)

We firmly believe that DEQ should consider air quality standards and the need for an air quality permit in this case. The gases emitted in the composting process could include toxic or otherwise harmful or dangerous (think explosions) gases. Something that smells this bad can't possibly be healthy for human exposure. I fail to see how DEQ has failed to include an air quality standard, since odor is essentially a gas. (Joelle Davis, Nov. 20, 2013)

DEQ Response: The proposed permit is a DEQ solid waste permit. DEQ's Solid Waste Program has referred these comments and the data provided to DEQ's Air Quality Program. DEQ's Air Quality Program is evaluating this data as well as data from California and Washington to determine if compost facilities in Oregon should be required to obtain DEQ air quality permits. In the meantime, DEQ will issue the DEQ solid waste composting permit to Grimm's. If DEQ's Air Quality Program determines composting operations require air permits, DEQ will work with each composting facility, as appropriate, to comply with applicable air quality requirements.

Dust:

Comment 16: DEQ received comments voicing concern about dust from composting as well as concern that the dust may contain pathogens.

I also wanted to comment on the opacity. 250 microns is visible dust. However, it's not respirable or inhalable. The thing that concerns me about Type 3 foodstocks is they carry something that the current feedstocks don't carry and that is human-borne pathogens, including viruses and bacterias, which require very careful monitoring of temperature and oxygen levels, etc. to make sure that those are adequately destroyed. I currently buy all my soil there now, but unfortunately, I probably won't in the future just because of the coner4 about food-borne pathogens if Type 3 foodstocks are accepted there. Inhalable particles are PM10 and less. PM2.5 is the primary concern. Bacteria, spores, viruses can be found in larger particles but they won't be detectable through just visibility so dust monitoring for accepting Type 3 feedstocks needs to be ratcheted up. (Chad Darby, Oct. 30, 2013)

I have concerns if Type 3 feedstocks are accepted just because of the concern about food-borne pathogens. I constantly have to wash the roofs of our RV's. (Jerry Fisk, Oct. 30, 2013)

I am concerned about the dust and spores and what those spores contain that the wind would carry into our neighborhood from a compost pile that contains Type 3 feedstock, which includes meat and dairy food waste and dead animals. (Emily Gonzalez, Oct. 30, 2013)

The same wind that carries the odor and particulates are also going to carry whatever materials are being generated from the putrefaction of these carcasses. What is going to be invading my house, and my body through, you know, breathing it, if what we're also having is putrefying dead animals wafting through the breezes? (Cindy Phillips, Oct. 30, 2013)

Adding food waste and the possible airborne human pathogens could harm the vulnerable residents living at Farmington Square. (Elizabeth Piazza, Nov. 20, 2013)

How does DEQ know if a facility is out of compliance for dust? How does DEQ measure/monitor that; against what standards? (Jonathan Crane, Oct. 31, 2013)

DEQ Response: There are several processing areas where dust may be created such as grinding, compost turning, screening, and transferring of material to the curing pile. Dust can be a concern regarding public health if not properly controlled. Dust controls and best management practices are key elements to Grimm's operations plan to ensure that public health is being protected.

DEQ regulations for composting facilities require facilities to have effective methods to reduce or avoid dust from operations and to prevent dust on facility roads from vehicle traffic. Facilities are prohibited from emitting particulate matter larger than 250 microns in size at sufficient duration or quantity resulting in observable deposition upon another person's property. DEQ requires that the facility address these requirements through best management practices as identified in the operations plan that DEQ approves. Facilities are required to take reasonable precautions to prevent dust from becoming airborne through operational and best management practices such as applying water while conducting operations (turning of piles or grinding feedstocks), cleaning trucks before they leave the facility, and sweeping roads.

DEQ has modified Grimm's permit to require an updated operations plan (permit condition 4.3) to demonstrate how dust will be controlled. In addition, DEQ will require a demonstration project of residential food waste feedstocks and an evaluation of how the performance standards will be met (permit conditions 1.3 and 1.4).

DEQ does not require monitoring equipment to verify compliance with this performance standard. DEQ conducts regular inspections at compost facilities and also responds to complaints. DEQ will visually inspect the site to determine if dust is a concern and require corrective action if dust is observed leaving the site.

Please also see the responses to comments #5 and #7 above.

Water Quality:

Comment 17*: It also concerns me about the quality of our water. This poses a hazard to groundwater and surface water which can jeopardize the health of domestic livestock, wildlife and pets. (Toni Anderson, Nov. 2, 2013)*

DEQ Response: When DEQ evaluated Grimm's composting operations, DEQ determined that their composting operations posed a potential environmental risk to groundwater and surface water. DEQ is not saying that Grimm's is currently creating water quality impacts only that Grimm's operations are capable of creating impacts if not properly managed. This is the reason for requiring a full composting permit which includes oversight of potential water quality impacts.

Environmental monitoring:

Comment 18*: Grimm's Fuel should be responsible for paying for monitoring of environmental risks, every 6 months, and provide DEQ and the Tualatin public with ongoing surface water testing, groundwater testing, odor and air quality testing. (Cassie Cohen, Nov. 16, 2013)*

The result of testing and inspections should be easily accessible to the public. (Ted Saedi, Oct. 30, 2013)

DEQ Response: Grimm's operates under a NPDES (National Pollutant Discharge Elimination System) storm water discharge permit which requires that surface water samples be collected quarterly. Grimm's is responsible for paying for the monitoring. The data collected is used by DEQ to assure surface water protection. The data will also be evaluated by DEQ's Solid Waste staff for groundwater concerns. These samples are required to be analyzed for general parameters such as oil and grease, pH and sector specific parameters such as phosphorus and nitrogen compounds.

DEQ does not require separate testing for odor or air quality. If the DEQ nuisance strategy is triggered, then DEQ may conduct odor surveys around the facility.

DEQ will conduct regular inspections of Grimm's to determine compliance with its solid waste permit. All inspection results and testing results are public record and available for anyone from the public to request. Depending on the size of the request, there may be a fee for locating and copying records.

Environmental Justice:

Comment 19*: We insist that DEQ review its Environmental Justice (EJ) Plan and priorities for this particular case, and respond to me and Rodolfo about how you will address these priorities for this permitting case. (Cassie Cohen, Nov. 16, 2013)*

The residents impacted by the dust and odors of this operation are skew to low income and elderly populations. In addition to the residential property owners, many residents are renters, as one of Tualatin's largest low-income housing developments is less than 1/4 mile away as the crow flies, as the wind blows. These families are entitled to clean air and water just as much as the rest of Tualatin and our surrounding communities. (Joelle Davis, Nov. 20, 2013)

DEQ Response: DEQ is committed to the principles of environmental justice and to ensuring that the agency's actions – including permitting, cleanup, policy and planning, outreach and education, and compliance and enforcement – address the interests of Oregon communities, especially minority, low-income and other traditionally underrepresented communities, as much as state and federal laws allow. DEQ agrees that everybody is entitled to clean air, water and land. DEQ's rules are implemented for the protection of public health and the environment for all people. By having oversight of existing composting operations DEQ is providing public health protection for all Oregonians.

DEQ is committed to including Oregonians through DEQ's public involvement process in permitting actions by providing an opportunity to express their views, concerns, values, and ideas. DEQ's public process is set up to address DEQ's Environmental Justice issues by conducting outreach through our public notification process. DEQ undertook a thorough public involvement process for the draft compost permit for Grimm's providing information to 83 neighbors located within a quarter mile of the proposed facility, DEQ's established mailing lists (1,890 people interested in DEQ's solid waste permits), and to key citizens that also had email lists who would share DEQ's public notice with their email groups. DEQ notified these groups of the public comment period, the public hearing, and the extended public comment period. In addition, DEQ published its notices in the Oregonian and on DEQ's public notice webpage.

DEQ has determined that the final solid waste compost permit for Grimm's Fuel is protective of public health and the environment. DEQ expects the owners/operators of the Grimm's facility to meet the conditions in the permit to ensure compliance with Oregon's solid waste regulations.

Permit Denial:

Comment 20: Many commenters requested that DEQ deny the permit application and not issue a DEQ solid waste compost permit to Grimm's.

> *We request that DEQ withhold authorization in its entirety. (Beverly Jackson Lake, Gair Property LLC, Nov. 15, 2013; similar comment from Melvin Jackson, Gair Property LLC, Nov. 8, 2013, Gail Tornquist, Nov. 15, 2013; Annie and George Vigileos, Nov. 18, 2013)*
>
> *My fear is that DEQ will perform in a manner it is gaining a reputation for -- essentially, providing only perfunctory oversight, acting as nothing more than a shallow speed bump for the well-connected beneficiaries of its 'decisions'. But my hope is that DEQ will dump the rubber stamp, and regulate honestly, fairly and transparently. Public sentiment is not only overwhelmingly opposed to this permit, public sentiment is in the right in opposing it. The proposed composting operation permit, at this time, at this location, is conspicuously misplaced. (George Vigileos, Nov. 18, 2013)*

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

Please also see the response to comments #5 and #7 above.

Comment 21: DEQ received a request from Cathy Holland to extend the public comment period to allow several businesses the opportunity to submit comments.

DEQ Response: DEQ agreed to extend the public comment period and issued a public notice extending the comment period until Nov. 20, 2013.

Comments in Support of Grimm's and Issuance of the Composting Permit:

Comment 22: DEQ received many comments supporting the issuance of the composting permit for Grimm's and supporting the service that Grimm's provides.

> *The attempt to paint Grimm's Fuel as the "new Nature's needs in 2014, is irresponsible at best. They provide a service that's been mandated by Oregonians in an ever-increasingly regulated environment. I would like to thank Grimm's Fuels for their efforts to recycle the area's yard waste, construction materials, concrete, etc. I urge DEQ to renew their permit. (Stephen Titus, Oct. 30, 2013)*

> *Grimm's is a valued member of our community and provide us with much needed recycling services. We are confident that Grimm's Fuel will maintain practices that will avoid harm to human health or the environment, and that they will continue to comply with all DEQ regulations. The services Grimm's Fuel provides our region are much needed, and the fifty-plus jobs that they supply the local families' truly make a difference in our community. And we thank you for that. (Linda Moholt, Tualatin Chamber of Commerce, letter Oct. 29 and verbal comments Oct. 30, 2013)*

I am glad to have them so close to my residence to take advantage of their yard debris drop off, along with their bark dust, soil and gravel products.(Joe Shroyer, Oct. 22, 2013)

We support the renewal of Grimm's Fuel Company's composting Permit. They provide us with a reasonably priced and local facility to recycle our wood and yard debris. (Chad Bentley, Oct. 17, 2013; Similar comment received from Tim Perri, Oct. 29, 2013 Similar comment from Robert and Mae Heide, Oct. 28, 2013, Charles Gorder and Carol Griest, Oct. 27, 2013, Robert and Mary Todd, Oct. 26, 2013, Doug Slead, Nov. 10, 2013)

I've been taking my landscape debris there for over 20 years. Seems like an efficient operation. (Steve Farrar, Oct. 17, 2013)

It's really handy having a recycle operation close by. Grimm's yard debris and recycling is an important service for the community and in my opinion should remain. (John Eastman, Oct. 21, 2013. Similar comment from Chad Bentley, Oct. 17, 2013, Joe Shroyer, Oct. 22, 2013)

We have been neighbors since 1998 and have not found their operation to be offensive in any way. (Tim Pearson, Oct. 21, 2013)

It would be a hardship to transport our compost and wood waste to a different location. (Norman Russell, Oct 22, 2013. Similar comment from Steve Patarozzi, Oct. 24, 2013)

Grimm's Fuel Company is a great business that provides a needed service for the local community and I support their efforts. (Ryan Sale, Oct. 22, 2103. Similar comment received from Kevin and Tiffanie Wheeler, Nov. 5, 2013)

I am an OSU Master Gardener and believe they provide a very valuable resource to both commercial landscaping companies and home gardening enthusiasts, such as myself. What else would we be doing with our organic garden debris if we have no place to properly dispose of it. They take our garden material and make it into a useful product to be reused in our gardens and landscaping. Besides, their company provides employment to a number of fellow citizens. I do hope you give full consideration to Grimm's Fuel application and renew their permit. (Bill Carver, Oct. 25, 2013)

I support continued operation of Grimm's composting. This facility has been located here for years and is a vital part of our region's recycling program. I have watched as new homes have encroached into the farm lands in this area and have wondered how they would deal with the odors from this site. The slight odor was there long before these homes were built and the new residents were certainly aware of the smells they were buying into when they moved in. I would rather see these homes go away and farms restored than impose any more limits on Grimm's operation. (George Helm, Oct. 29, 2013)

Their facility is in a very convenient location for Sherwood, Tualatin and Tigard residents. I have made many trips to their facility for both dropping off yard debris and

picking up product for our landscaping needs. While at their facility I have noticed nothing offensive, in any way, only a professional environment for the public and their employees. (Rob Gamache, Oct. 30, 2013)

I am in favor of the food compositing as long as Grimm's follows the outlined conditions for protecting our water ways. (Megan Boden Alvey, Nov. 2, 2013)

I have never felt that there is an odor problem with Grimm's in all the years I have been a customer and a neighbor. You can smell rotting plant materials which is like a manure smell but only when you are right there. Grimm's does a great job managing their site. (Brad Parker, Nov. 6, 2013)

We are all aware of the cost savings to businesses, residents and municipalities when our recycling programs are within our neighborhood's reach. It is important to notice that Grimm's has been a successful recycling company; a major player in bringing to fruition and maintaining the environmentally sustainable and natural resource recovery programs that Grimm's has participated in since the mid 1980's. McFarlane's Bark, Inc. is a proponent for the reinstatement of the Grimm's Fuel Company DEQ permit. (Kathleen McFarlane, Oct. 23, 2013)

DEQ also received a petition containing 453 signatures from people who support renewal of Grimm's permit. *(Jeff Grimm, Nov. 20, 2013)*

DEQ Response: Comments of support noted.

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Public Hearing: Grimm's Fuel proposed composting permit
October 30, 2013
Juanita Pohl Center, 8513 SW Tualatin Rd, Tualatin OR 97062

Transcript of oral comments

DANIEL HOUGH: OK, so I will now call the public hearing to order. Today is Wednesday, October 30, 2013, and the current time is 7:12 p.m. My name is Daniel Hough. I also work with the DEQ Northwest Region office, and I'll be the Presiding Officer for this hearing.

The purpose of the hearing, as you know, is to take comments on the proposed DEQ Solid Waste composting permit for the Grimm's Fuel Company—for the Grimm's Fuel Company composting facility.

I will call people to come up to comment one-by-one. This meeting is being recorded, and by signing up to provide verbal comments, you are consenting to be recorded.

DEQ will consider your comments, and any suggested changes you make, to the extent that DEQ rules and laws allow. Please be aware that you might raise issues that are outside the scope of our authority. Following the close of the public comment period, DEQ will prepare a response to comments. That document will be provided by an on-line posting and email sent to all people who commented. If you didn't put your email address on the sign-in sheet, please do that if you would like a copy of the comments.

Please come to the table when you are called, state your name, and speak into the microphone so your comments will be recorded. Please respect the rights of individuals who are making formal comments, and do not interrupt while they are speaking.

OK, so when I call you up, I will also call the person who is on deck, we will be taking comments in the order that people signed in tonight. So I'll call the name of the person who will be giving comments, and the next person, so that they can prepare, if they don't remember where their spot coming into the room was. Uh, you have three minutes to comment. We have a lot of people commenting tonight. We have 17 comments, people wanting to comment on the list. Once you get to 30 seconds, uh, prior to the end of your three minutes, I'll just raise my hand to remind you that you have 30 seconds left to wrap up, and at three minutes I'll go ahead and ask you to finish.

I can also take written comments here, or as has been mentioned here, we can take written comments in a number of other ways.

OK! So, Stephen Titus is first in line and Virginia Green will be after Stephen.

STEPHEN TITUS : Are you ready?

DANIEL HOUGH: [*room noise*] I am almost ready. OK. So just for the record, if you could go ahead and state your name, that would be great.

STEPHEN TITUS: My name is Stephen Titus. I'm a resident of the northern part of Tualatin. I'm here in part because I received a newsletter from my local CIO [*citizen involvement organization*] with an unbelievable amount of slander regarding Grimm's Fuel and their composting operation. The attempt to paint Grimm's Fuel as the "new Nature's Needs in 2014" is irresponsible at best.

I believe in citizen involvement, but not the current format of the CIOs. We have small groups of citizens, in private meetings, who then try to represent their ideas as the consensus of the larger community. I've shared my views on CIOs with our city council in public meetings.

Grimm's Fuel was a pioneer in the efforts to recycle, and one of the original pilot projects of large scale composting in 1975. In 1983, Oregonians passed the Opportunity to Recycle Act which mandated that every community set up a system to provide opportunity to recycle the sorts of materials that Grimm's processes. In 1991, Oregonians extended the mandate with Senate Bill 66, and further expanded the requirements with the Omnibus Recycling Bill in 1997. In 2001, House Bill 3744 set the goals to 50% recovery of material that in the past had been burned into the atmosphere or dumped into our landfills. In 2010, Metro confirmed that we are meeting those goals.

I met the Grimms when they were amending their CUP [*conditional use plan*] with the city in 2011. They seem like honest people trying to provide a service that's been mandated by Oregonians in an ever-increasingly regulated environment. I'd like to thank Grimm's Fuels for their efforts to recycle the area's yard waste, construction materials, concrete, etc. I urge you to renew their permit.

Thank you for your time.

DANIEL HOUGH: Thank you for your comment. OK, so Virginia Green is next, and then following that, Colin Green.

VIRGINIA GREEN: OK, I don't speak very loudly. I hope you can hear me.

DANIEL HOUGH: Hang on a second; we have a microphone for you.

VIRGINIA GREEN: OK. All right, I'll see if that works.

DANIEL HOUGH: And if you could go ahead and state your name, too, that would be great.

VIRGINIA GREEN: My name is Virginia Green, and I live on 135th Terrace, in Pony Ridge. And it's a lovely little neighborhood, with tree-lined streets and lots of kids, and—but sometimes, it stinks, right now. And sometimes, outside on a beautiful day, you can't be out

there because the air smells bad. And sometimes in the middle of the night, I have to close my windows against the odor. And that's not pleasant to live with.

I know we have to have composting, but we also have to have rules that control odor for the people who live in the community. And he was here a long time, and I respect that. But we are here now, too. And we need to work really hard so that we don't have to have that kind of smell, in the best possible way.

The possibility of adding Type 3 foodstocks is really concerning, um, now or in the future. The potential increase in odors could further affect the quality of my life, and it could also increase the odors, um, for us living at, for our—I'm sorry, I'm losing my track here. Uh, it could also affect the monetary, have a monetary impact on the value of my home. No one is going to want to buy a house where it smells. When I bought this house I didn't realize that it was a problem. And right now, you know, it's an unpleasant problem, but it's still livable. But if we increase to the kinds of foodstocks we're talking about—dead animals—that makes me really concerned.

So, um, I think we should be careful to take a close look at this ten-year permit, and not go ahead until we have more information as to potential impact on the community, and assurance that the best methods to control odor are going to be used now and in the future.

Thank you.

DANIEL HOUGH: Thank you. [*paper noise*] Colin.

COLIN GREEN: Um, I'm actually not reading for myself. I'm reading a letter from the neighborhood—

DANIEL HOUGH: Right—

COLIN GREEN: I don't know how you want—

DANIEL HOUGH: So, I have you doing two comments, one [*crosstalk*]

DANIEL HOUGH: So, if you don't mind holding the microphone, and if you could just state your name, and that you're reading a letter on behalf of the residents—

COLIN GREEN: My name's Colin Green, and I live in Pony Ridge. And I'm reading a letter from residents which I did not draft; I'm just the orator.

UNIDENTIFIED AUDIENCE MEMBER: We can't hear you.

COLIN GREEN: OK. Uh, this is a letter that was drafted by the residents of Pony Ridge—I'm just the orator, I did not draft it. I am a signer, but I did not draft it. I'm just reading it for them. My name is Colin Green.

We, the residents of Pony Ridge, the closest residential community of Grimm's Fuel Company facility, 350 yards [*away*] per Google Map, have the following problems with the current state of Grimm's operations and troubles concerning the recent proposed permit.

Problems with the current state of operation: Many times the odor becomes so overwhelming that those of us closer to compost piles are forced to close our windows. The odor even seeps through the closed windows. The stink has restricted our outdoor activities, such as having a barbecue, being in the back yard, or walking around the block, especially during times when the compost piles are being turned. In general, this awful smell has degraded our quality of life in this beautiful community, not to mention having a negative impact on our property values. It was expected that Grimm's would have modified the operations and mitigated the odor emissions by now, but regretfully, the problem still persists. The composting process of, uh, open air, quote, pile-it-high, unquote, does not work now to control or reduce odors as evidenced by the hundred complaints in the last two years. As our homes are only 350 yards from Grimm's facility, a proven composting system which truly minimizes odors must be used by Grimm's. Such current processes are used by compost companies in the Portland Metro area and have demonstrated that odors can be controlled and significantly minimized.

Problems with the proposed DEQ draft permit: The proposed time period of ten years is not acceptable without public comment periods built into it at critical junctures. The allowance of Type 3 feedstocks should be deleted from this proposed permit, as Grimm's has yet to resolve their repeated current odor problems with the current permit for Type 1 and Type 2 feedstocks. Until Grimm's updates its composting process, they should not be allowed to receive Type 3 residential feedstocks. [*paper noise*]

If DEQ per—uh, grants the proposed permit against our recommendations, under no circumstances should Grimm's Fuel be permitted to receive and process Type 3 commercial feedstocks. Our community does not need to go through the same experience as North Plains community did in 2012-2013. The end result is obvious.

In conclusion: We and the community want to maintain a good relation with Grimm's Fuel Company. We have been good neighbors to Grimm's and are expecting Grimm's to respect and value the quality of life of its neighbors. Grimm's, in order to be a good neighbor, must alter the composting process of a large-pile method. Grimm's must adopt the current best practices, such as anaerobic digester or covered windrows with forced-air AD—aeration systems similar to that used by Nature's Needs in North Plains.

Respectfully signed by [*inaudible*][*paper noise*]

DANIEL HOUGH: OK, thank you. Next we have Ted Saedi, followed by Joelle Davis. And if you could just state your name.

TED SAEDI: My name is Ted Saedi. I live in Pony Ridge, 135th. And I've been living in Pony Ridge for the past 15 years. Earlier years, we were detecting some odors but did not know where

it's really coming from. We thought it's some livestock farm, or something in our vicinity. The odor was not any[*thing*] close to what we are experiencing in past few years. Sometimes the odor is so nasty that we run to close the windows, that the smell, you know, is already filled the house. And often we are not successful.

Going through this permit, of allowing the process, to process Type 3 feedstock, will worsen the situation. Therefore I am opposing the expansion of the current permit. Furthermore, on the proposed permit, one—the, the result of testing and inspection to be easily accessible to the public. Two, paragraph 9.15 is mandating Grimm's to report if complaints for every incident reaches five, or odor lasts for 24 hours. I think every complaint, or every event lasted more than two hours deserves report to DEQ.

And the compost operations description—a more modern method of composting needs to be requested, where compost piles are located so close to the residents.

Last paragraph of Risk Assessment is talking about submitted Grimm's plan for odor control—uh, for odor control. This plan is to be easily accessible to the public also. And I'm hoping that the plan is uh, a fundamental change to the processing technique, and goes beyond monitoring the wind.

Uh, before we talk about this proposed compost permit for Type 3 feedstocks, Grimm's needs to fix the current odor problem with the existing permit of Type 1 and Type 2 feedstocks.

Thank you.

DANIEL HOUGH: Thank you for your comment.

TED SAEDI: Do you need this one?

DANIEL HOUGH: Uh, yeah, next we have Joelle Davis, followed by Cathy Holland. [*Pause*] Hi.

JOELLE DAVIS: Hi. My name is Joelle Davis. I'm a member of the City Council in Tualatin, but I'm here tonight as a citizen, and the views expressed tonight are my own. Other members of Council may agree or disagree with my views tonight, and I expect that to happen.

I have been a resident of north Tualatin, on the far west end, for going on fourteen years, and when we moved in, and for years past, I always wondered exactly what the smell was, but until 2011, I never knew exactly what it was or where to report on it. And I along with many other residents understood what the reporting process was. Starting in 2011, which is when we saw an uptick in, ah, in complaints about the odors. Many residents in our neighborhood and Pony Ridge and other impacted places rely on a few individuals to make those complaints on behalf of their neighborhoods, as we all have busy lives and can't spend every day on the phone with the regulatory authorities. So my understanding is that the original conditional use permit was granted in 1994, at least the ones that I have been provided. There was a second one in 1997 and

a third in 2011. All of these conditional use permits are specific to tax lots 1800 and 1900. The DEQ permit request covers both of those plus additional tax lots of 2000 and 2100. These lots don't have CUP approval from the city, and the city shouldn't have given that impression, on the Land Use Compatibility Statement, that those lots have approval for that type of use, in my opinion. The conditional use permits require a water treatment system to be constructed, and such a facility was built. According to city records, it was reviewed and approved in 1998—fifteen years ago. The city doesn't have further records that I have been provided, that the system has been inspected or reviewed since that time. And, of note, the system—the water quality treatment system—was constructed on tax lot 2100 despite the fact that the conditional use permit does not apply to that tax lot and the composting activity was never permitted to take place on that lot. The city allowed tax lot 2100 to be used for storage purposes starting in 1994, or some time earlier, um, that record is fuzzy. Composting activity was not supposed to take place on that lot. But I have concerns that that may actually be occurring today, based on our observations, aerial photos, and the fact that the water quality facility was built on that property and not on the 1800 and 1900 tax lots which are where the bulk of the composting activity seems to take place.

DANIEL HOUGH: [*whispering*] You have about thirty seconds.

JOELLE DAVIS: OK. Um, so—As a resident, the odor has been a continuous problem with only 25 percent of all the subject property being used for composting right now. I have grave concerns about how much worse it will get with approval of this permit to employ all of the tax lots that are being requested in this permit, and then adding Type 3 feedstocks on top of that.

Um, we have a lot of changes coming to this area. The area has changed significantly since the time that these operations were begun. And that's not Grimm's fault that the area has changed. It's just that this is the way the development happened. And, um, I don't—I have concerns about the compatibility of these operations with the surrounding uses.

DANIEL HOUGH: OK. Thank you for your comments. Cathy Holland, followed by Emily Gonzales.

CATHY HOLLAND: Thank you, Mr. [*pause*]H-Huff. "Huff?"

DANIEL HOUGH: Correct.

CATHY HOLLAND: [*laughs*] My name is Cathy Holland. I'm a resident of Tualatin. Uh, I'm here tonight to ask if the DEQ will consider extending the written comment period by seven days from November 5th to November 12th, to allow some business property owners an opportunity to respond. In the Q-and-A portion tonight, which was not recorded, uh, the discussion of what is in the application for feedstock, uh, 3, is more narrow than the way the permit currently reads—as others have read it. And they wanted time to be able to evaluate it and then send their comments in. Uh, they also want to say that the Grimm's are fantastic people. This has nothing to do with the property owner, the operator, or the applicant. They are quality people. But the odor has been a problem. And there is a concern that the odor ha—is not yet under control with

feedstocks 1 and 2, which is similar to comments you just heard from the residents. Adding the Feedstock 3, as it's currently in the code, has raised all kinds of concerns about the impact on the market value, the property value, uh, the lease, uh, the opportunity to lease property. And although there's lots of reasons for property to be vacant, I think sometimes the Grimm's get blamed for things. So in any case, that's our comment and our request.

DANIEL HOUGH: Thank you. [*pause*] And I—I had you for an, an additional comment, does that cover both of your comments?

CATHY HOLLAND: Yeah—Oh, yeah, that's the only comment I have.

DANIEL HOUGH: OK. So, um, Andy Stirling is next.

UNIDENTIFIED VOICES: Emily. Emily Gonzales.

DANIEL HOUGH: Oh! I'm sorry.

UNIDENTIFIED VOICE: I got you, on [*unintelligible*] number two.

DANIEL HOUGH: Thank you. OK. Sorry about that.

UNIDENTIFIED VOICE: We'll do them both right now?

DANIEL HOUGH: Yeah, we'll them both.

EMILY GONZALEZ: I'll do mine first.

DANIEL HOUGH: And Andy Stirling will be next.

EMILY GONZALEZ: My name is Emily Gonzalez. I live on 134th in Pony Ridge. Um, my family moved into Pony Ridge three months ago, and we immediately, upon our second day there, were hit with the smell. We didn't know what it was until we started speaking with our neighbors and we quickly realized that, um, a lot of the neighbors didn't know what to do about it. Nobody knew that there was a reporting system in place, nobody knew what to do until went to a block party, and met some of the other neighbors who were more involved.

But I'm here today to speak on behalf of the children in Pony Ridge. Our neighborhood is <u>full</u> of young children who are already affected by the current odor levels. Some days are so bad my three children can't play outside. My three- and six-year-old complain that it smells like dog poop. If Grimm's is allowed to accept Type 3 feedstock, the children of Pony Ridge will lose even more time outdoors. Just in the last three months, there have been weeks where the smell has been <u>horrible</u> four out of seven days. I can't fathom the smell getting any worse.

I'm also concerned about the dust and spores that were mentioned in the question and answer period, um, about what those spores contain that the wind would carry into our neighborhood

from a compost pile that contains Type 3 feedstock, which includes meat and dairy food waste, and dead animals. Um, and, um, that concludes my personal one.

DANIEL HOUGH: OK. And if you'll just say what—who will your comment be on behalf of?

EMILY GONZALEZ: I am reading a letter on behalf of Treske Precision Machining.

Treske Precision Machining is located at 14140 SW Galbraith Drive in Sherwood about a mile southwest from Grimm's Fuel. The company has been at this location since 1999 and is surrounded by many businesses in this industrial sector. Noxious odors from Grimm's reach our facility at least three times per week. Though in most cases the odors are tolerable, there are occasions where the fumes are much worse. Treske employs over 100 persons, all of whom would be affected should Grimm's be allowed to compost Type 1 through Type 3 feedstocks. As a business that has to comply with stringent regulations—local, federal, and even international—for products that we manufacture, it is of great concern that Grimm's Fuel be allowed to compost such feedstocks without greater regulations. Businesses such as ours would be greatly affected by the noxious odors that could emanate from Grimm's if they compost Type 3 feedstocks. It can have an effect on the health and wellbeing of our employees, and would have an impact on our ability to retain and hire employees, thus ultimately affecting the performance of our business. As a business owner, I understand Mr. Grimms's rationale for obtaining this permit. However, it is also up to Grimm's to ensure that their business practice [*sic*] do not impact the businesses and communities that it is near to. For Grimm's to accept any feedstock waste, it should be held to tighter standards and sanitation regulations to ensure minimal impact to its neighbors. We respect his desire to increase his business, but only ask that the DEQ and Grimm's seriously consider the impact that composting feedstocks would have in the immediate area.

DANIEL HOUGH: Thank you. Uh, Andy Stirling? And next will be Callie.

ANDY STIRLING: Good evening. I'm Andy Stirling. I live on 134th Terrace in Pony Ridge. Um, I'm a head, a head of a household of five. I have three children that live with me there. I unfortunately live 850 feet north of Grimm Fuel's northern compost heap. Um, I want to start off by saying I'm an advocate of small business. I think it's the backbone of society, it's, American society. I'm a firm believer that it's important. But along with that prosperity comes responsibility to the neighbors and the environment. My neighbors have already mentioned in this forum, um, how the different odors have affected them, in their lives and their families' lives. I'd like to mention, on a person note, how it has negatively affected my property value. There was a short period of time last year where I needed to rent my home for three months. I tried to get my sister to rent the home for three months. And she stated two reasons she didn't want to. One, the yard wasn't big enough (of no fault to Mr. Grimm). The second was because I "live next to a manure plant." Now, she is not as enlightened as we are, in that this is not a manure plant. However she thought it was because the smell is so bad. So there is diminished value there. I would like to know who will compensate me for that diminished value when I go to sell my home. Is it going to be Mr. Grimm? Is it going to be DEQ, for are allowing this to happen? I've been a tolerant neighbor in the past, and I have not been vocal or complained about the smells and odor I've smelled. Like Emily mentioned before me, I didn't know, um, there was

a, an event to actually get that complaint registered. Now I do, and I'll be sharing that with my neighbors to make sure that they also know.

The most important thing I'd like to leave DEQ with, is that please, please, if you do permit this activity to occur, with this Type 3 food waste—and I hope that you don't, but if you do—please make sure that there's checkpoints involved where citizen comment is taken and considered, and so that we have the opportunity to come and talk about our experiences, if they're not complying with their permit.

That's all I have.

DANIEL HOUGH: Thank you. Callie? And then I have Mark Eberhart next.

CALLIE LOSER: Hi.

DANIEL HOUGH: Hi

CALLIE LOSER: Hello?

DANIEL HOUGH: If you could state your name, too.

CALLIE LOSER: Oh, oh yeah. OK. My name is Callie Loser. I'm a resident of North Tualatin. I live, uh, we live near Hazelbrook Middle School where—we live up on the east side, really close to Hazelbrook Middle School. And you know, I just want to make a brief comment that we smell the noise, uh, we smell the smell, the odor from where we live. And it does get bad, I have to shut the windows. Uh, it could be a nice spring day. So it's annoying. I think it's just not only me, I hear all of these other people and I'm also thinking about the middle school. I'm [*laughs*] right next to the middle school. So I know they smell it as well. So I'm just concerned about, um, about adding Type 3 feed lot material to the existing permit. I think more work has to be done to control the odors or don't extend the permit.

Thank you very much.

DANIEL HOUGH: Thank you. Mark, followed by Chad Darby.

MARK EBERHART: Hi, let me know when you're ready.

DANIEL HOUGH: I'm ready for you. Just state your name, that would be great

MARK EBERHART: My name is Mark Eberhart. I live in David's Fox Run, also next to Hazelbrook School. I had not planned on commenting tonight, but since I had the opportunity, I decided I would, mainly because I agree with the comments that have been given so far this evening. Uh, there, when we first moved in, uh, there was a period of time, things were fine, then all of a sudden we have this very sickly, kind of sweet, unusual strange smell permeating the whole area. Ah, I thought, well, we're next to Lamb, we're next to JE, I thought, maybe it's

some industrial outgassing that happens at night, or something. But it was widespread. And then it happened again, and then again. And then one time I got in my car, and said [*laughs*] "I'm going to go try and find what's going on," and drove around. And I st—I have—To be accurate, I can't 100 per cent say I was able to pinpoint it, but it just seemed to be stronger, more toward Cipole Road, and Grimm's, and all that stuff. I'm having to make the assumption that it's the composting.

So if it is, simply, my comment would be that, that the level of activity that they do now is enough, as in, it has enough impact on us, we smell it a lot. It affects our activities. Uh, Callie and I exercise a lot, we walk a lot, bicycle a lot. We want to be outside. And there's been quite a few times when I've gone outside and went, "Ugh! Not tonight! Let's forget it!" You know, because it's just—a smell that, uh, it doesn't, like, stop you in your tracks, but it's stuff, you just don't want to be in it. You don't want to smell it.

From my limited knowledge of composting, uh, it seems like vegetable matter has a certain type of effect or level, but once you add uh, lipids or fats from animal products, uh, meat, uh fat, whatever, other organics, that would come from the Type 3 that's been discussed, I think the odor level would go up, go up probably a lot. And I don't think it should. It's enough as it is right now.

And that's about all I have to say.

DANIEL HOUGH: Thanks for your comments.

MARK EBERHART: OK, thank you.

DANIEL HOUGH: So, Chad, followed by Jan.

CHAD DARBY: I'm Chad Darby. I'm an air quality engineer, with twenty-two years of experience. And first of all, I love Grimm's Fuel. I think I'm there just about every Saturday buying soil or getting rid of yard debris, so, uh, I think I should have direct deposit of my paycheck there. [*audience laughter*]

What I question in the existing permit, however, is the use of Type 3 foodstocks. And I object to a permit that would allow that just through modification of the operating plan as opposed to looking at the technology involved. EPA—and I've got some things I'll hand in for the record here—has a best management practices guidance document that talks about methods for composting food waste. And they're basically forced-air piles or turned windrows, neither of which technique I think is done at Grimm's now, but, uh, that I don't know. However, I did read the draft permit and operating plan, and, you know, EPA recommends keeping track of particle size, oxygen, moisture, carbon-to-nitrogen ratio, and temperature. And I really only saw discussion of oxygen— excuse me, of temperature in that operating plan. So, this is the EPA guidance.

Washington Department of Ecology, which is the equivalent of Oregon DEQ across the river, requires air permits currently for food waste composting facilities. They recently did a study of composting facilities on the east side and west side of the state, and what they found was that in the wetter climate, there was significantly more hazardous air pollutants emitted from food waste composting facilities. What they found at one facility was over eleven tons of acetaldehyde emissions, in addition to formaldehyde, benzene, and other compounds, as well as odor-causing compounds. That would require an air quality permit in the state of Oregon.

There is another reason why food waste composting may trigger air permitting requirements. Under OAR 340-216-0020, Air Contaminant Discharge Permits, Tables 1 and 2, it talks about types of facilities that require air permits. One of the listed facilities is not food waste composting. However, there is a category that does require air contaminant discharge permits, and that is "all sources having the potential to emit more than 10 tons of a single hazardous air pollutant." The other category is, um, "all other sources not listed herein that DEQ determines an air quality concern exists or one which would emit significant malodorous emissions." Both of those would trigger air permitting. And I didn't see anything in the record discussing what Oregon DEQ is doing about air permitting if Type 3 foodstocks are allowed.

So, I also wanted to comment on the opacity. I talked about fugitive dust, and I agree that 250 microns is visible dust. However, it's not respirable or inhalable. And the thing that concerns me about Type 3 foodstocks is they carry something that the current feedstocks don't carry, and that is human-borne pathogens, including viruses and bacterias, which require very careful monitoring of temperature and oxygen levels, et cetera, to make sure that those are adequately destroyed. I currently buy all my soil there now, but unfortunately I probably won't in the future, just because of the concern about food-borne pathogens if Type 3 foodstocks are accepted there.

Inhalable particles are PM_{10} and less. $PM_{2.5}$ is the primary concern. Bacteria, spores, viruses are not found in—well, they can be found in larger particles, but they wouldn't be detectable through, just through visibility, so I think that the dust monitoring for accepting Type 3 foodstocks needs to be ratcheted up.

Thanks.

DANIEL HOUGH: Thank you. OK, Jan, and then Linda Peters.

JAN GIUNTA: I have to follow him? [*audience laughter*]

I'm Jan Giunta. I live in North Tualatin. And the first thing I want to do is submit about 52 complaints, and I apologize, um, we did—I did mail these to Stephanie [*Rawson*], but I think they were lost in between the time we were doing the traditional logging and then the new on-site. So there's the old-fashioned log-in type, I'm not sure they've been counted by DEQ in the complaints. In addition to that, I've received two more complaints today, so I'd like to have those admitted into the record as well.

I have five points to make. Some of them are technical, and I won't get into that, I'll just submit my record.

Point number one, the draft DEQ composting permit for Grimm's Fuel, should not be considered further, as the draft permit does not include operating conditions and performance standards which are adequate to provide the necessary assurance to the community that odors will be minimized and retained within property boundaries. And I won't get into the OARs that support that. If DEQ does indeed move ahead granting such a permit, the DEQ should consider OAR 340-096-0150 part 2. And I will read that. "DEQ may further require the facility to modify operations and otherwise implement all reasonable and practicable measures determined necessary by the Department to control and minimize adverse impacts of odors outside the boundaries of the facility." We as residents do not consider the pile-it-high method, uh, to be acceptable in today's environment, with the buildup in the urban area, and the ar—primary aray—[*laughs*] primary aeration system being proposed and currently used by Grimm's is a Caterpillar D9—as acceptable.

Second point. Grimm's operation plan should not be accepted by DEQ. As a plan, Section 4 is inadequate to provide the necessary information and assurances that the composting facility will comply with the required performance standards regarding odor emissions. And that's in—blah-blah-blah [*sic*]—point 007. Based on the approximate one hundred complaints of odor emissions and their—and the complaints tonight, occurring beyond the facility boundaries in just the last two years, the present operation fails to meet the standard. The plan continues the use of past failed practices, so DEQ and the community do not have the required assurance that the odor performance will be—will be, uh, met in the future.

Point three. If DEQ and Metro do grant the necessary permits and agreements allowing Grimm's to accept Type 3 foodstocks, under no conditions should Grimm's be allowed to accept commercial Type 3 feedstocks. And this category should be explicitly excluded from any permit or agreement.

Point four. If DEQ and Metro do grant the necessary permits and agreements, then based on the number of odor complaints in the last two years and the reality that this present composting process does not control odors as required—as required by the state of Oregon performance standards for composters, that Grimm's not be allowed to receive Type 3 residential feedstocks as well.

Point five. If DEQ does grant the permit, then a ten-year period is excessive, based on the above points. I recommend a trial period of only two years in order to assess conformance with the required standards.

Thank you.

DANIEL HOUGH: Thank you. Linda, and then, uh, John Fettig. [*pause*] Whenever you're ready.

LINDA PETERS: OK. Good evening. My name is Linda Peters and I live in North Plains, actually, not North Tualatin. [*laughs*] You may not even know where North Plains is. And I'm not actually in town, but I'm close enough to have, uh, suffered through the, the ordeal with Recology and the food composting operation there. And, uh, I'm here tonight to represent an organization called Washington County Citizen Action Network [CAN], of which Jan and I are board members. It's an organization that links up people from a variety of groups who are active in Washington County about various different aspects of our quality of life. And it turns out that, um, air quality seems to be a really important unifying factor. We are now—Washington County CAN is, is supportive of the neighbors who are objecting to an expansion of Grimm's permit. We are, uh, involved right now in working with Intel and DEQ on a lot of the questions surrounding their air quality permit for their new plants. Our hope is that if enough people who have enough concerns about the problems that are going on in their own neighborhoods and the projects that are proposed for those neighborhoods that are gonna impact their air quality, your, uh, water quality, whatever it is that you feel is threatened—if we, we from various parts of the county can be in communication with one another and support one another in our efforts to stop some of the, some of the worst offenses, um, we all benefit.

And so, again, I encourage you to keep pressing for better solutions than just ongoing expansions of big, smelly, offensive, um, projects in your own neighborhood. There are other kinds of solutions. There are other ways we could be handling solid wastes. We could be doing it anaerobically. We could be doing it on a distributed basis instead of hauling all of it off to one great big place and compounding the air problems and the water problems and the soil problems for the people who have to be near that one big place. Some of these ideas are way outside the framework of what's currently our regulatory system, but people working together can, over time, influence what those regulatory systems provide. And I invite you to join with us, [*laughing*] those of you who are fighting this fight. And some of the things that we can do together to, to bring about change that really will protect our environment, will protect our health, and will protect our quality of life in ways that the current regulatory don't seem to be quite doing.

Thank you.

DANIEL HOUGH: Thank you. John, followed by Linda Moholt.

JOHN FETTIG: [*sighs*]

DANIEL HOUGH: Whenever you're ready.

JOHN FETTIG: I'm John Fettig. I've been working in the commercial real estate industry in Tualatin for nearly thirty years and represent many, many business owners and property owners, tenants, and prospective business—businesses that might have interest in moving to the Tualatin and Pacific Northwest areas. And in polling my customers and listening to their viewpoint on the smell associated with Grimm's Fuel, like any logical person making an informed decision, it's not positive. Grimm's serves a purpose. Most of us probably utilize the services, buy the products, drop our recycled goods to their operation.

Adding components that increase the aroma, I think is a mistake. I have property located around Grimm's, unfortunately downwind, with the prevailing southwest winds. It doesn't take a scientist to go up on Pacific Avenue and just open your window or walk out there and smell the smell. As we recruit companies to the area, they want to put a medical facility, an office building, some sort of complex that draws outside air for conditioning, those customers walk away real fast when that smell occurs. So I see, I see a balance, but I also see respect. If I had a business that impacted many, many people, impacted air quality, uh, logic tells me I might want to change my method of operation if the technology allows. I may want to relocate components of my company to more rural and appropriate areas. So logic, respect, and trying to get along, and, and, you know, being a—I'm not a resident in Tualatin, and I sure would feel bad with a window open and a prevailing southwest wind, if I was located north of the site. And it's bad today, and I don't see it getting better, if they're allowed to, uh, deposit the food and the dead—dead animals, that's, uh, not a good thought. So, I'm not in favor of it. Most of my customers are not either. But I would look for a solution to improve the problem.

Thank you.

DANIEL HOUGH: Thank you. Linda.

LINDA MOHOLT: Good evening. I'm Linda Moholt with the Tualatin Chamber of Commerce and also a twenty-six year resident. I'll get—grab my glasses. I have a letter of support.

The Tualatin Chamber of Commerce is submitting a letter of support for Grimm's Fuel with regards to the renewal of their current composting permit of Type 1 and Type 2 feedstocks. Grimm's Fuel moved to Tualatin in 1975 and has been processing yard debris and green waste since 1980. They have been a valued member of our community, providing much-needed composting services. Care is taken throughout all stages of their operation to ensure that the highest levels of environmental safety and DEQ standards are upheld to minimize the potential environmental risk. As performance standards and regulations have evolved over the years, Grimm's has continued to update their processes to stay abreast of those changes. We are confident that Grimm's Fuel will maintain practices that will avoid harm to human health or the environment, and that they will continue to comply with all DEQ regulations.

Thank you for allowing us to weigh in and support a very important and valued business in our community. That Grimm's—The services that Grimm's Fuel provides our region are much-needed, and the fifty-plus jobs that they supply the local families truly make a difference in our community. And we thank you for that.

DANIEL HOUGH: Thank you, Linda. Is there anyone else that wants to provide a comment that didn't get a comment card in at the beginning? OK, can we go ahead and do that?

BRETT HAMILTON: My name is Brett Hamilton. I moved here three years ago. This is our first house that I've ever bought—my wife and I, after we got married. And, uh, it's disappointing, to say the least, to live somewhere where you take a trip north, south, east or west, and you open

your window, and you go "Wow, Oregon, smells so great!" And you come home, and it's like, "All right, it smells like you-know-what." So I would encourage DEQ to not let the problem get worse, and to encourage them to do whatever it takes to limit the impact of the business's air pollution to the air around—that's contained by their property and not impact miles away. Thank you.

DANIEL HOUGH: Thank you. [*off-mic*] I'm going to need to pull that up, too, thanks. [*on-mic*] Did you have a comment also?

CLIFF HERBISON: I do.

DANIEL HOUGH: If you could go ahead and state your name.

CLIFF HERBISON: My name is Cliff Herbison, and I live about a hundred yards from Grimm's. And I think the only thing I really want to say is if they can't control the odor that they have now and have had—uh, there was a comment made that they continually are upgrading and changing and trying to provide means to make things better, and I don't see that that's happened. I've lived here only about five years. So I guess the comment is that if they can't control the odor they have now, how do you expect to control with more added to that, that facility?

DANIEL HOUGH: OK.

CLIFF HERBISON: Thank you.

DANIEL HOUGH: Thank you. Other comments? Uh, I'll take this hand, and then if you want to come up?

UNIDENTIFIED VOICE: I'll fill out the card.

DANIEL HOUGH: Yeah. Uh, yeah, we need, uh, if you just commented, I need you to fill out a card, I need you to fill your name out here for me, thank you.

HAMID RAD: My name is Hamid Rad. Good evening, everyone. What I'm hearing from the folks [*that*] live in the community, except for the last letter that was stated, is that this already bad for the community. I bought—I purchased a property here in 2001. Only tonight I learn that they've been operating since 1975, were property as 1975. There was nothing these residentials around, especially eld—elderly, you know, residential, you know, north of the premises. My question is that, isn't it time for them to move altogether from this area, rather than requesting for an additional, uh, permit that [*will*] only worsen the situation for the children. And not only the children, but also the elderly living, or the community. Was the, you know, the reason they are staying here, only 50 family against maybe, you know, 500 families? And when I am hearing the odor goes all the way to Tualatin, you can imagine what it does 200 feet, or 200 feet across from them.

Thank you.

DANIEL HOUGH: Thank you. Will you fill this out for me? He had a comment here.

CINDY PHILLIPS: Good evening. My name is Cindy Phillips. And when I came here tonight, I had no intention of speaking, because I really hate speaking in public hearings. However, um, in, in listening to some of the comments that are being made, and some of the, uh—and looking at the Administrative Rule which talks about the feedstocks, I feel that I have to say something. First of all, I'd like to say for the record that I, I agree very much with the gentleman in the red coat, Mr., uh, Herbison? And that is, if you can't control the odors now, how are you going to control them when they get even worse? But, the other thing I wanted to point out is this issue about the feedstocks. Apparently, if this permit is granted, Grimm's will be able to not only put in their, um, uh, compost piles uh, yard and garden waste, wood waste, agricultural crop residues, wax coated cardboard, uh, vegetative food waste, things like that—Those are Type 1 foodstocks, all right? They will *also* be able to put in—excuse me, I'm trying to do this with a, with my smart phone and it's not being very smart tonight. They will also be able to include manure and bedding and other materials the Department determines poses a low risk [*pause*]—and I don't—low risk from hazardous substances— [*audience member hands her paper copy of regulations*] Oh, thank you so much! [*audience laughter*] Sometimes you need paper! Um, —and other physical contaminants. Now, I don't know if any of you have ever actually worked around manure or bedding, but I have, because I have horses, and I muck their stalls all the time. And I can tell you that it is nasty. and I was not aware, until tonight, that Grimm's now can —can compost Type 2 feedstocks, which include manure and, and animal bedding.

But now they're talking about adding Type 3 feedstocks, which include dead animals, and the only dead animal they can't use is apparently a cow or their entrails that has actually, um, uh, shown that they are, uh, uh, showing evidence that they have mad cow disease. In other words, you can put dead deer in there, you can put dead dogs, you can put dead horses, dead donkeys—and again, um [*sighs*] it just bothers me.

We are complaining about the odor at this point in time. But that very same wind that carries the odor and particulates are [*sic*] also going to carry whatever materials are being generated from the putrefaction of these carcasses. And it is making me sick to even think about it.

Um, I'm very lucky. Where I live, uh, the wind doesn't come to me as often. But I can tell you, the first time I noticed that sickly smell, I thought the city of Tualatin had put out, uh, you know, like unfinished steer manure as fertilizer or something. It was awful, and I was so glad that I was getting in my car and going to work, because I wouldn't have to smell it. And that smell lasted for days.

Um, what is going to be invading my house and my body through, you know, breathing it, if what we're also having is putrefying dead animals wafting through the breezes?

Thank you very much.

DANIEL HOUGH: Thank you for your comment. Is—oh, I need you to fill this out for me, sorry. Is there anyone else that would like to provide a comment? Yes. If you could just state your name for me?

ARACELY DRLIK: Hi, my name is Aracely Drlik. I also did not have any intentions of speaking tonight. I live in Pony Ridge. As you've heard from some of my other neighbors, we live really close to Grimm's and the smell is, um, pretty bad. And I've lived there for six years now. It is also my first home, so I would say I was really excited to have this house. Throughout the years, the smell has gotten worse and worse, and basically what I'm gathering from this altogether is, um, I propose that DEQ tries to set with Grimm to analyze the current, um, procedures that they have to try to, um, review, like, the quality of the--how it smells, and all that kind of stuff, review those processes and implement new ones how they can fix the current ones before they start passing and adding other things.

That's all.

DANIEL HOUGH: Thank you.

JERRY FISK: Hi, I'm Jerry Fisk. I have the business across the street on Highway 99, um, the FunTime RV. I was—I'm kind of pro-business, like to see people expand and such, but this—it does—it's already impacted my business as it is. I've had customers, uh, become nauseous and leave, and not want to buy an RV or such that uh, because of the smells. That's—it happens only rarely, at times, but I can't see it, with the smells getting any worse, that uh with the composting of uh, of uh, of food waste and such, would be a lot worse than it is. So I'm totally against that.

And [*as*] far as the dust particles, I really didn't think about it until they were talking about it, is: Our RVs have white roofs, and we constantly have to wash the roofs because we <u>are</u> getting dusted all the time. So [*pause*], I'm against the, uh, expansion.

DANIEL HOUGH: OK, thank you. Any other comments? [*pause*] If you commented and are currently filling out a card, a comment sign-up card, if you could just make sure I get it so that we can—so we know who you are, and—Not seeing any other comments, I will go ahead and close the hearing. The time is currently 8:10 p.m. And we want to thank you for all of your comments tonight.

AUDREY O'BRIEN: All right, so thank you, everyone, very much for coming. We will stay around if people want to, uh, we have the room until 9:00. We'd like to start packing up around 8:30 or so. We're happy to stay around for a little bit, if people want to have ongoing questions and discussions. We can do that in a small group if that works for folks. Thank you <u>very</u> much for taking the time to come tonight and give us your comments.

Our next step will be to, uh, continue to receive written comments until the end of the comment period. And we will go back and evaluate whether we'll extend the comment period or not. I can't commit to that tonight, but we'll go ahead and evaluate whether we can do that. And we'll

let you know. We'll do another notification through our Gov Docs mailing if we do decide to extend the comment period.

And then our next step will be to evaluate the comments we received, and go through and decide what changes we might want to make to the permit. And then we'll notify you about how we're going to respond to all of the comments that we've received tonight. We'll let you know what the changes to the permit might be made, and then we'll move forward with—after that. So thank you very much for taking [*room noise*].

So are there people who do want to stay around for a while? Or do you want to head out? [*room noise*] To those who want to stay around, Stephanie and Larry are here.

Grimms Fuel Hearing

Daniel Huff - Hearings Officer

Written comments by 6:00 Nov 6

Introduction

Andy Stirling

18383 SW 134th terrace

Head of a family of 5.

850' north of the closest ~~heap~~ compost

Advocate of small business, believe it is the backbone of America.

Along with prosperity. Responsibility to neighbors and environment

My neighbors have mentioned .... how odors affect lives

I would like to focus on diminished home value, my family's biggest investment. Raise family, call it home

Provide specific example of Sister who ...

"Manure plant"

Go to sell. Person passes because of the smell...

There is diminished value there and I would like to know how affected people are to be compensated.

By who, Mr. Grimm, DEQ???

Tolerant neighbor. In the past I have not been vocal or complained ... call to duty protect my family. + home value.

Find others who, when affected adversely will do the same. Small percentage speaking out at this time.

My most important point I would like to leave you with is not to give a blanket approval.

It is important that there are check points in the permit where citizen comment is considered.

Please, Please don't let this facility accept ~~food~~ type III waste. It's not the appropriate ~~place~~ for it.

location or facility

Jan Giunta

From: bobfrances@comcast.net
Sent: Wednesday, October 30, 2013 2:39 PM
To: Jan Giunta
Subject: RE: Bob Barnes replied to your post

Jan,
Yes, you have my permission to say Grimm`s should not be allowed to process food waste. Didn`t we learn anything from the bad experience from the company out by Hillsboro?
Bob and Frances Barnes
----- Original Message -----
From: Jan Giunta <jan.giunta@gmail.com>
To: 'bob barnes' <bobfrances@comcast.net>
Sent: Wed, 30 Oct 2013 17:58:55 -0000 (UTC)
Subject: RE: Bob Barnes replied to your post
Do I have your permission to submit this into the record tonight?
-----Original Message-----
From: Nextdoor Riverpark CIO1 [mailto:reply@nextdoor.com]
Sent: Wednesday, October 30, 2013 10:56 AM
To: jan.giunta@gmail.com
Subject: Bob Barnes replied to your post
Hi Jan,
Bob Barnes just commented on your post. He wrote:
"Jan,
Grimm`s produces a terrible, sickening smell from their operation as it exists now. They shouldn`t be allowed to process rotten food !
Bob"

in response to:
"DEQ public hearing tonight Juanita Pohl Center, 6:30. Should Grimms Fuel Co take Portland area food waste."

To view this conversation, or respond with a comment, visit:
https://riverparkcio1.nextdoor.com/news_feed/?post=2709392&s=ce
To send a message to Bob, visit:
https://riverparkcio1.nextdoor.com/news_feed/?message_to=77745&s=ce&post=270
9392
You can also leave a comment by simply replying to this e-mail.

To unsubscribe or change your email settings, please visit:
https://riverparkcio1.nextdoor.com/email_prefs/?panel=n
This message was intended for jan.giunta@gmail.com.
Nextdoor, 101 Spear Street, Suite 230, San Francisco, CA 94105

RE: Draft Permit for composting by Grimms Fuel Co. 10/30/2013

Grimms is located in a high density urban area. The facility is surrounded on the east with high-end industry at their property line and to the north businesses and residential subdivisions are within 350 yards. Four cities are affected to differing degrees by the Grimms Fuel Co composting activities: Tigard, King City, Tualatin, and Sherwood.

1. The draft DEQ composting Permit, for Grimms Fuel should **not** be considered further as the draft permit does not include operating conditions and performance standards which are adequate to provide the necessary assurance to the community that odors will be minimized and retained within the boundaries of the property. OAR 340-96-0070, 0090, 0150.

If DEQ moves ahead with granting such a permit, then DEQ should consider OAR 340-96-150, Part 2: Special Rules Pertaining to Composting: Unacceptable Odors
The provision allowed in this rule is DEQ

"may further require the facility to modify operations and otherwise implement all reasonable and practicable measures determined necessary by the department to control and minimize adverse impacts of odors outside the boundaries of the facility. ..."

So if DEQ does issue a permit, then DEQ has the right and the obligation to the community to require Grimms to modify its operations and implement all reasonable and practicable measures to minimize odor. The present use of large pile composting processes and the use of a Caterpillar D-9 do not constitute measures and operations which meet the standards of this section as evidenced by the continue odor emissions beyond facility boundaries over the last 2 years.

2. Second, Grimms Operation Plan should **not** be accepted by DEQ as the Plan, Section 4 is inadequate to provide the necessary information and assurances that the composting facility will comply with required performance standard regarding odor emissions. Based on the approximate 100 complaints of odor emissions occurring beyond the facility boundaries in just the last 2 years the present operation fails to meet the standard. The Plan continues the use of past failed practices, so DEQ and the community do **not** have the required assurance that the odor performance standard will be met in the future.

An example is found in Grimms submitted Operations Plan, Section 4: Grimms states concerning the cause of any complaints due to odor emissions:

"People are justifiably concerned that our neighborhood is going to become the next North Plains. These fears are helping to fuel our current rash of complaints. If a complaint is received, we document as much information as possible, including who, what, when and where. Wind speed and direction is noted before thoroughly investigating the cause of the odor. Odors can generally be traced to either an unusual circumstance at the facility (i.e. spontaneous combustion fire, receipt of mushroom compost, etc.) or a neighbor (i.e. rendering plant, abandoned sewage treatment pond, plastics manufacturer, etc.)"

In this statement Grimms Fuel Co. does not accept its responsibility for the continuing odor emissions. The reason Grimms states for the complaints is due to North Plains has heightened people's concerns-not Grimms repeated odor releases. Grimms states that odor can be generally traced to other sources which of course that is not true as except for only minor events the odor emissions are clearly from Grimms Fuel. Further, though it is accepted BMP to track wind direction and locate a specific cause for an isolated odor, neither of these

activities constitute a viable odor minimization program. Until Grimms changes its big pile process and the primary aeration system of a D-9, odor emissions beyond the facility boundaries will continue.

3. If DEQ and METRO do grant the necessary permits and agreements allowing Grimms to accept type 3 feedstocks, under **NO** conditions, should Grimms be allowed to accept commercial type 3 feedstocks. And this category should be explicitly excluded from any permit or agreement.

4. If DEQ and METRO do grant the necessary permits and agreements, then based on the number of odor complaints in the last 2 years and the reality that the present composting process does not control odors as required by the State of Oregon performance standards for composters, that Grimms **not** be allowed to receive type 3, residential feedstocks as well.

5. If DEQ does grant the permit, then a 10 year period is excessive based on the above points. I recommend a trail period of only 2 years in order to assess conformance with the required standards.

Thank you for consideration,

Jan Giunta
22 year resident of north Tualatin
17655 SW Shawnee Trail
Tualatin, OR 97062

Date: October 30, 2013
To: Holly Pence & Stephanie Rawson,
Solid Waste Permit Coordinator, DEQ
From: Pony Ridge Residents, Tualatin

Re: Proposed Composting Permit For Grimm's Fuel Co.

We, the residents of Pony Ridge, the closest residential community to the Grimm's Fuel Co. facility (350 yards per Google Map) have the following problems with the current state of Grimm's operations and troubling concerns about the recent proposed permit.

Problems with the current state of operation:

- Many times, the odor becomes so overwhelming that those of us closer to the compost piles are forced to close our windows. The odor even seeps through the closed windows.
- The stink has restricted our outdoor activities, such as having barbeque, being in our backyards or walking around the block, especially during turning compost piles
- In general this awful smell has degraded our quality of life in this beautiful community not to mention having a negative impact on our property values.
- It was expected that Grimm's would have modified the operations and mitigate the odor emission by now, but regretfully, the problem still persists
- The composting process of open-air "pile it high", does not work now to control or reduce odors as evidenced by about 100 complaints in the last two years. As our homes are only 350 yards away from Grimm's facility, a proven composting system which truly minimizes odors must be used by Grimm's. Such current processes are in use by compost companies in the Portland-metro area and have demonstrated that odors can be controlled and even significantly minimized.

Problems with the DEQ Proposed Draft Permit:

- The proposed time period of 10 years is not acceptable without public comments periods built in at critical junctions.
- The allowance of type 3 feedstocks should be deleted from this proposed permit, as Grimm's has yet to resolve the repeated current odor problem with the current permit for type 1 and 2 feedstocks. Until Grimm's updates its composting processes they should not be allowed to receive type 3 residential feedstocks.

- If DEQ grants the proposed composting permit against our recommendation:Under no circumstances should Grimm's Fuel Co be permitted to receive and process type 3 commercial feedstocks. Our community does not need to go through the same experience as N. Plains community did in 2012/13. The end result of approving this draft is obvious.

We, in the community want to maintain a good relationship with Grimm's Fuel Company. We have been good neighbors to Grimm's and are expecting Grimm's to respect and value the quality of life of it's neighbors. Grimm's in order to be a good neighbor must alter the composting process of the large pile method. Grimm's must adopt the current best management practices such as anaerobic digester or covered windrows with forced air aeration system similar to that used by Nature's Needs in North Plains, OR.

Respectfully:

Ted Saedi	atasaedi@hotmail.com
Mahvash Saedi	mahvashsaedi@hotmail.com
Virginia Green	gin-frank@comcast.net
Colin Green	electroncricket@gmail.com
Emily Gonzalez	luxil18@gmail.com
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Hamid Rad	rad.hamid@gmail.com
Malihe Razavi	rad.hamid@gmail.com
George Moua	resident of 135th Terrace
Travis Boyce	resident of 135th Terrace
Marvel Dunlop	resident of 135th Terrace
Jack Acebo	resident of 134th Terrace
Marcha Acebo	resodent of 134th Terrace

My name is Stephen Titus and I'm a resident of the northern part of Tualatin. I'm here in part because I received a newsletter from my local CIO with an unbelievable amount of slander regarding Grimm's Fuel and their composting operation. The attempt to paint Grimm's Fuel as the new Nature's Needs of 2014 is irresponsible at best.

I believe in citizen involvement but not the current format of the CIOs. We have small groups of citizens in **private** meetings who then try to represent their ideas as the consensus of the larger community. I have shared my views on CIOs with our City Council in ***public*** meetings.

Grimm's Fuel was a pioneer in the efforts to recycle and one of the original pilot projects of large scale composting in 1975.

In 1983 Oregonians passed the "Opportunity to Recycle Act" which mandated that every community set up a system to provide the opportunity to recycle the sorts of materials that Grimm's processes.

In 1991 Oregonians extended the mandate with Senate Bill 66 and further expanded requirements with the "Omnibus Recycling Bill" in 1997.

set the goals to 50% recovery

In 2001 [redacted] House Bill 3744 [redacted] of material - that in the past - had been burned into the atmosphere or dumped into our landfills. In 2010, Metro confirmed that we are meeting those goals.

I met the Grimm's when they were amending their CUP with the city in 2011. They seem like honest people trying to provide a service that has been mandated by Oregonians in an ever increasingly regulated environment.

I'd like to thank Grimm's Fuel for their efforts to recycle the area's yard waste, construction materials, concrete, etc.

I urge you to renew their permit. Thank you for your time.

I have been living in Pony Ridge for past 15 years. Earlier years we were detecting some odors, but did not know where it is coming from. We thought, it must have been some livestock farm somewhere in the vicinity. The odor was not any close to what we are experiencing in past few years. Sometimes the odor is so nasty that we run to close the windows before the smell fills the house, but often unsuccessful. Going through with this permit of allowing to process type III feedstock, will worsen the situation. Therefore, I am oppose of the expansion of the current permit.

Furthermore, on the proposed permit:

1) The result of testing and inspections to be easily accessible to public.
2) Paragraph 9.15 is mandating Grimm's to report if complaints for every incident reaches 5 or odor lasted for 24 hours. I think every complaint or every event lasted more than 2 hours deserves a report to DEQ
3) Under Compost Operation Description, a more modern method of composting needs to be requested, where compost piles are located so close to the residence.
4) Last paragraph of Risk Assessment, is talking about submitted Grimm's plan for odor control, this plan to be easily accessible to public and I am hoping that the plan is a fundamental change to the processing technique and goes beyond the monitoring wind.
5) Before we talk about Proposed Composting Permit for type III feedstocks, Grimm's needs to fix the current odor problem with the existing permit of type I & II feedstocks.

Regards,

Ted Saedi
18397 SW 135th Ter
Tualatin, OR
97062

TRESKE
PRECISION MACHINING

Date: October 30, 20013

To: Holly Pence, DEQ

Subject: Proposed Composting Permit for Grimm's Fuel

Dear Holly,

Treske Precision Machining is located at 14140 SW Galbreath Dr. in Sherwood, about a mile southwest from Grimm's Fuel. The company has been at this location since 1999, and is surrounded by many businesses in this industrial sector. Noxious odors from Grimm's reach our facility at least three times per week. Though in most cases the odors are tolerable, there are occasions where the fumes are much worse.

Treske employs over 100 persons; all of whom would be affected should Grimm's be allowed to compost Type 1 through Type 3 feedstocks. As a business that has to comply with stringent regulations, local, federal, and even international for products that we manufacture, it is of great concern that Grimm's Fuel be allowed to compost such feedstocks without greater regulations. Businesses such as ours would be greatly affected by the noxious odors that could emanate from Grimm's if they compost feedstocks. It can have an effect on the health and wellbeing of our employees and would have an impact on our ability to retain and hire employees; thus ultimately affecting the performance of our business. As a business owner, I understand Mr. Grimm's rationale for obtaining this permit; however, it is also up to Grimm's to ensure that their business practices do not impact the businesses and communities it is near to. For Grimm's to accept any feedstock waste, it should be held to tighter standards and sanitation regulations to ensure minimal impact to its neighbors. We respect his desire to increase his business, but only ask that the DEQ and Grimm's seriously consider the impact that composting feedstocks would have in the immediate area.

Respectfully,

Theo Treske
President
Treske Precision Machining
14140 SW Galbreath Dr.
Sherwood, OR 97140

Jan Giunta

From: Toni Anderson [tntand@gmail.com]
Sent: Wednesday, October 30, 2013 5:12 PM
To: 'Jan Giunta'
Subject: Food waste processing at Grimm's on 99w in Tualatin???!!! NO!

Food waste processing at Grimm's on 99w in Tualatin???!!! NO!
This triggers my memories of the Redland dump, around the time I-205 was new.
I used to drive by it, try to hold my breath, but the smell would still be in my nose for hours afterward.
I'm concerned this will pollute our town for YEARS to come. – Toni Anderson 17790 SW Cheyenne Way; Tualatin

1

DEQ
State of Oregon Department of Environmental Quality

Comment Sign-up/Comment Card

Name: Stephen Titus
Address: 10170 SW SEDLAK CT
City: TUALATIN Zip: 97062
E-mail: sntitus@gmail.com
Comments:

2

DEQ
State of Oregon Department of Environmental Quality

Comment Sign-up/Comment Card

Name: Virginia Green
Address: 18363 SW 135th terrace
City: Tualatin Zip: 97062
E-mail: Jin-Frank@comcast.net
Comments:
Wish to Speak

(3)

DEQ
State of Oregon Department of Environmental Quality

Comment Sign-up/Comment Card

Name Colin Green
Address 18363 SW 135th Terrace
City Tualatin Zip 97062
E-mail: electronnickel@gmail.com
Comments

(3b)

DEQ
State of Oregon Department of Environmental Quality

Comment Sign-up/Comment Card

Name Colin Green
Address 18363 SW 135 Terrace
City Zip
E-mail:
Comments Reading aloud letter from residence.

4

Comment Sign-up/Comment Card

Name TED SAEDI
Address 18397 SW 135TH TER
City TUALATIN Zip 97062
E-mail: ATASAEDI@HOTMAIL.COM
Comments

5

Comment Card

Name Joelle Davis
Address 17910 SW 115th Ave
City Tualatin Zip 97062
Email: Joelle.d.davis@gmail.com

(6)

DEQ
State of Oregon Department of Environmental Quality

Comment Sign-up/Comment Card

Name Cathy Holland
Address 10740 SW Lures Dr
City Tualatin Zip 97062
E-mail: catherine.p.holland@gmail.com
Comments Oppose commerical feedstock – need more time to submit written comment

Request 1 week extension from Nov 5 to Nov 12 for written comments.

(7)

DEQ
State of Oregon Department of Environmental Quality

Comment Card

Name Emily Gonzalez
Address
City Zip
Email:

DEQ
State of Oregon Department of Environmental Quality

Comment Card

(7b)

Name Emily Gonzalez on behalf of Treske Precision Machining
Address
City Zip
Email:

DEQ
State of Oregon Department of Environmental Quality

Comment Card

(8)

Name Andy Stirling
Address 18383 SW 134th Ter
City Tualatin OR Zip 97062
Email: andystirling32.2@gmail.com

(9)

DEQ
State of Oregon Department of Environmental Quality

Comment Sign-up/Comment Card

Name CALLIE LOSER
Address 17700 SW 111th AVE
City Tualatin Zip 97062
E-mail: ~~[illegible]~~ callie-mark@frontier.com
Comments

(10)

DEQ
State of Oregon Department of Environmental Quality

Comment Sign-up/Comment Card

Name MARK EBERHART
Address 17700 SW 111th Ave.
City TUALATIN OR Zip 97062
E-mail: callie-mark@frontier.com
Comments

DEQ
State of Oregon Department of Environmental Quality

(11)

Comment Card

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

DEQ
State of Oregon Department of Environmental Quality

(12)

Comment Card

Name Jan Giunta
Address 17655 SW Shawnee Tr
City Tualatin Zip
Email: janogiunta@gmail.com

DEQ
State of Oregon Department of Environmental Quality

Comment Card

(13)

Name Linda Peters
Address 25440 NW Dairy Creek Rd.
City North Plains OR Zip 97133
Email: lindabpeters@gmail.com

DEQ
State of Oregon Department of Environmental Quality

Comment Card

(14)

Name John Fettig
Address 805 SW Broadway
City Portland OR. Zip 97205
Email: johnfettig@capacitycommercial.com

(15)

DEQ
State of Oregon Department of Environmental Quality

Comment Card

Name Linda Mohalt
Address 18791 SW. Martinazzi
City Tualatin **Zip** OR.
Email: linda@tualatinchamber.com

DEQ
State of Oregon Department of Environmental Quality

Comment Card

Name BRETT HAMILTON
Address 11430 SW KALISPELL ST
City TUALATIN **Zip** 97062
Email: brett@simple.be

(17)

DEQ
State of Oregon
Department of
Environmental
Quality

Comment Sign-up/Comment Card

Name Cliff Herbison
Address 13335 S.W. UTE St
City Tualatin OR Zip 97062
E-mail: Cliff.Herbison@Evergreenairlines.Com
Comments Grims cant control the odor now so why would you think they could control odor in the future by adding Type 3 Feedstocks. I think Grime should be put on probation for the next 5 years to clean up the current smell before granting any new permit.

(18)

DEQ
State of Oregon
Department of
Environmental
Quality

Comment Sign-up/Comment Card

Name Hamid Rad
Address 13335 SW UTE ST.
City TUALATIN, OR Zip 97062
E-mail: rad.hamid@gmail.com
Comments

The current odor is already jeperdizing the lives of residents, I don't think if they can't control the odor now, how are they proposing to add a process plant for "DEAD" animals ??

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PENCE Holly

From: Elizabeth Piazza [piazzaelizabeth3118@gmail.com]
Sent: Wednesday, November 20, 2013 15:53
To: PENCE Holly
Subject: Grimm's Fuel DEQ Application

I am writing to strongly urge the DEQ not to grant permission for Grimm's Fuel to add food waste to their feedstock. My friends have told me about this and I wanted to let you know that there are many of us who can't believe this is happening to our neighborhood.

I am a resident of Tualatin. My two grown children and their families live in Tualatin. We all live within 2 miles of the facility. I am writing on their behalf as well. We want to ask - Didn't you learn anything from what happened in North Plains? This kind of processing needs to be far away from residential areas. Grimm's Fuel is too close.

All of us have had to deal with the smell from Grimm's Fuel. Now, it is not every day. But it often enough to drive people out of our neighborhood. I am sure the people at Grimm's are nice people but they can't manage their existing odors. They should not be allowed to add spoiled dairy and meat. Everyone knows they contain more germs.

But this is not the only reason I am urging you to not issue this expanded permit. My husband is very ill. The kind people at Farmington Square are taking care of him. Farmington is within 1,500 feet of Grimm's. One of his only pleasures is walking outside with help. The bad smell from Grimm's already robs him from this pleasure. Adding food waste and the possible airborne human pathogens could harm him and other vulnerable residents at Farmington.

Why in the world would you allow something like food waste to be processed near homes, care facilities, and other businesses? I am very worried about air quality and I hope you will reexamine your standards to see if you haven't made a terrible mistake. I understand the Tualatin City Council has approved this. Once again, they have demonstrated either lack of caring or do not have technical knowledge. The DEQ can't rely on the City Council to protect us. They haven't in the past and it looks like they aren't doing so again.

Remove food waste from Grimm's Fuel permit.

Mrs. Elizabeth Piazza
Tualatin, Oregon

From: Dan Grimm
To: PENCE Holly
Subject: We support Grimms
Date: Wednesday, November 20, 2013 10:51:14

Holly,
Attached are 453 signatures from people who are supporting the renewal of our composting permit. I would like to submit these for the record as part of the public comment process.
Thanks,
Jeff Grimm
Grimm's Fuel Company

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

Name	Address	Phone
1. Rachel McCowin	580 SW 1st St Lake Oswego OR	619-746-3334
2. Ken Welch	457 S. 26th Av Cornelius OR 97113	503 681 3004
3. [illegible]	3690 SW 73rd Ave, Portland 97225	503-292-6553
4. T C S	Lawn Servises	503.569.5853
5. [illegible]		503 318 2539
6. Jesus Zacarias		503 839 9574
7. Randy Palmore		503-459-6300
8. Stephanie Pierce	10044 SW Palmer Cir. Ptld	503-452-4486
9. Steve High	3240 NW 101st Port. 97229	503 292 3936
10. Mike Gephart	20947 SW 87th ct	971-207-4463
11. Fui Naaniumatu	21267 S.W Ladyfern DR Sherwood 97140	
12. [illegible]	16440 SW Gleneagle DR Sherwood 97140	
13. Bruce Swola	14725 SW Sunset Blvd. Sherwood, OR. 97140	
14. Randy Rabusin	1941 S.W. Canby St. Ptld OR	971-344-2734
15. Frida Gephart	20947 SW 87th ct	503-957-2011
16. [illegible]	8072 S.W [illegible]	
17. [illegible]	8120 SW 155 Beav 97007	
18. Armando Sanchez	8060 SW Avery St Tualatin OR 97062	
19. Ted Magnuson	14405 SW High Tor Portland 97224	
20. Robert Y Cole	2540 SW 91st Beaverton 97225	
21. Adam Badsiger	10335 SW 70th Tigard OR 97223	(503) 475-5913
22. Dan Conner	10650 S.W. Kiowa Ct Tualatin, Or	503-691-0558
23. Bruce Andrus-Hughes	17045 SE 108th Ave, Tualatin OR 97062	

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

Name	Address	Phone
1. Rachel McCowin	580 SW 1st St Lake Oswego OR	619-746-3334
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5. [illegible]		503 318 2539
6. Jesus Zacarias		503 839 9574
7. Randy Palmore		503-459-6300
8. Stephanie Pierce	10044 SW Palmer Cir. Ptld	503-452-4486
9. Steve High	3240 NW 101st Port. 97229	503 292 3936
10. Mike Gephart	20947 SW 87th ct	971-207-4483
11. Fui Naaniumatu	21267 S.W Ladyfern DR Sherwood 97140	
12. [illegible]	16440 SW Gleneagle DR Sherwood 97140	
13. Bruce Svola	14725 SW Sunset Blvd. Sherwood, OR. 97140	
14. Randy Rabouzu	1941 S.W. Canby St. Ptld OR	971-344-2734
15. Erika Gephart	20947 SW 87th ct	503-957-2011
16. [illegible]	8072 S.W [illegible]	[illegible]
17. B Jean Clauson	8120 SW 155 Beav 97007	
18. Armando Sanchez	8060 SW Avery St Tualatin OR 97062	
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23. Bruce Andrus-Hughes	17045 SE 108th Ave, Tualatin OR 97062	

2

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

	Name	Address	Phone
1.	[illegible]	PORTLAND OR	503 245 1526
2.	Ivan Henrejon Jr	16405 Burnside ST pt 114 portland	503 770 0745
3.	Dennis Gofield	9265 SW Washin DR. Tigard	503 452-7563
4.	Tom Connilly	28400 S.W Cindd Hill Sherwood	503 625-3042
5.	[illegible]	10675 SW Black Diamond Way	503 86-05
6.	[illegible]	Willson Ville, OR	503-318-3280
7.	Rod Cook	1010 Elm Dundee OR	503 939 1849
8.	EDUARDO Leiva	11436 SW 115th Tigard	
9.	[illegible]	11835 S.W Summer Crest Dr. Tigard	97223
10.	Enrique PEAK Landscape.		
11.	[illegible] Kays	2235 Willamette falls dr West Linn	
12.	[illegible]	7130 S.W Barbara Lane Tigard	503 505 8412
13.	DONAVAN DICHTER	2009 SW BROADWAY DR	97223
14.	RAMIRO CALLETANO SALEM		503 8712332
15.	[illegible]		503) 933-7119
16.	William JONES / JHP	P.O. Box 1243 Lake Oswego, OR	97035
17.	[illegible]	9323 SW TONOPAH TUALATIN OR	
18.	[illegible]	7410 SW Oleson Rd #223 PDX, OR 97223	503 977 1867
19.	Craig Bateman	11125 S.W. 123rd PL Tigard	97223 828-8723
20.	John E. Hyde	17060 SW Chatelain Dr. Aloha OR.	97006
21.	Pam Davis	12865 SW Glen Drive Beaverton OR 97008	503-469-1566
22.	Doug Slaughter	3218 SW Hunter St Portland, OR	97219
23.	John SLAUGHTER	9445 SW Brentwood Place Tigard, OR	503-234 5975 97224

503-639-1336

3

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

	Name	Address	Phone
1.	David Kawaszki	19376 SW Winslow Dr Beaverton OR 97007	503-649-5036
2.	Jeff McKenzie	8675 SW Garden Home Rd	(503) 407-4742
3.	Roberto Barakas	14425 SW Whitter Rd Beaverton	(971) 292-4583
4.	Keith Lowe	18189 SW Fitch Dr Sherwood	5036259078
5.	Edward Smith	4542 SW Taylors Ferry RD Portland	503 245 6229
6.	Jamie Filley	6348 SW Seymour PDX	503-297-2280
7.	Cindi Haidet	12041 SW Tooze Rd Sherwood OR	503-570-8059
8.	Jessalyn Sutterlund	12041 SW Tooze Rd Sherwood, OR	503-781-7591
9.	Jimmy R Brown	5005 SW Murray Blvd Beaverton	503 443 6519
10.	Tyson E. Hailey	11865 SW Tualatin RD 104 Tualatin OR	97062
11.	ARTEMIO CHAVEZ	509 S. Meridian St Newberg	503-472-0748
12.	Mark Taylor	2412 Glen Eagles Rd Lake Oswego, OR	503-313-4835 97034
13.	Deren Minor	16410 SW Sunset Blvd. Sherwood, OR	
14.	Dawn O'Leary	21487 SW Roelich Ave Sherwood OR	503 984-1841
15.	Rainer M Corbin	4118 SW Idaho Ter Portland	97221
16.	Susan M Corbin	4118 SW Idaho Ter Portland OR	503-313-2261 97221
17.	Christopher HADFIELD	8253 SW Woody End Durham, OR	97224
18.	Sharon Tietsort	23760 SW Scott Ridge Terr Sherwood, OR	97140
19.	Lindsay Sanders	11146 SW Koller St. Tualatin, OR	97062
20.	TOM ANDRICH	8400 SW WOODSIDE DR PORTLAND	503.427.2721 97225
21.	Armando Bernal	18641 SW McCarey DR #12	503-734-5943
22.	Gregory Scal Ferro	7315 SW 104th Ave 97001	503 643 0826
23.	[illegible]	15120 SW Cinq Bird Bev OR	97005

4

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

Name	Address	Phone
1. Jose Jon Ruiz	10633 SW Murdock ST Tigard OR 97224	971-226-5117
2. Alejandro Ruiz	5830 SW Erickson Ave Beam	503-330-1829
3. [illegible]	Grim 2 [illegible]	639-0692
4. [illegible] Rosel	9645 SW 107th DAKOTA	887-4972
5. Kurt Putnam	8120 SW Chestnut St. Tigard, OR	503-244-2561
6. Ken Haymond	11705 SW Lancaster Rd Portland	503-516-0664
7. Josh Salaets	6379 SW 177th Place Aloha OR 97007	541-915-2100
8. Brandon Bennins	17841 SW Heatherwood LN Sherwood, OR 97140	503-927-4721
9. Daniel Beshears	12140 SW Betts Ct Beaverton, OR 97008	503-[illegible]-8705
10. [illegible]	48 Touchstone Lake Oswego OR	503 699 1379
11. [illegible] Hajoo	15967 SW Emmet Tigard OR	503-590-1621
12. Richard Tomes	15179 SW 84TH Ave Tigard OR	503 630-7359
13. Thomas E Freni	9430 SW McDonald St Tigard OR 97224	503-314-6259
14. Nikolas Frenis	14135 SW 93rd Av. Tigard OR 97224	503-319-2092
15. Brent Peterson	14360 Amberwood Circle Lake Oswego 97035	503 670-4948
16. Larry L Paulsen	17690 SW Shawne Tr Tualatin	503-691-2226
17. [illegible] Parker	818 SW 3RD AVE [illegible] Portland Or	503-758-7410
18. Jim SIEHL	9670 SW Eagle Lane Beaverton Or. 97008	503-644-0990
19. Kathryne Psihogios	830 SW Burlingame Terrace, Pdx OR 97239	503 516-7100
20. JOHN RICHEN	6903 SW 36TH PORTLAND, OR 97219	
21. Terri Ward	20541 SW 103rd Ave. Tualatin, OR 97062	
22. [illegible]	13515 SW 129th TIGARD	503-579-5053
23. Linda Yoresa	13515 SW 129th Tigard	539-3100

5

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

	Name	Address	Phone
1.	[illegible]	Lake Oswego OR	503 816 6050
2.	Cecilia Moule, FAS	Moule Landscape	503 267.9534
3.	[illegible]	Mario Nieto 455 NE Canby OR 97013	(503 983 3943)
4.	MIKE RASMUSSEN	4623 SW IDAHO 97221	503 245-8862
5.	Jose Ayala	Tualatin OR.	971 235-74-92
6.	[illegible]	9310 SW 175th Beaverton	503-840-9573
7.	Jill Valdenegro	Parrott Mtn	503 625 6458
8.	Jennifer Holman	8514 SW 46th Ave	503) 490-4141
9.	[illegible]	Espinosa	503 530 6071
10.	JASON SAGEN		503 863 7146
11.	JAMES M PENSE	8205 S.W. OAK ST. TIGARD	503 245-0251
12.	L.E. BOSS	10040 SW PAVLINA TUALATIN, OR 97062	9712553121
13.	[illegible]	6479 SW Burlingame Portland OR 97239	
14.	[illegible]	13010 S.W. Carmel ST. King City, OR 97224	
15.	[illegible]	15745 SW Bobwhite CRL Beaverton Ore 97007	
16.	Juan Carlos	11823 NE Carl Rd #	503 984 2793.
17.	KEITH HUNTER	9720 SW DURHAM Rd 97224	503-997-3600
18.	Dan Ettelstein	23773 Scott Ridge Terrace	503-625-9316
19.	Willy Chavez	11611 S.W. TOOZE Rd Wilsonville OR 97070	
20.	Anthony Henderson	4499 SW Stoddard dr. Aloha Ore 97007	5035473205
21.	[illegible]	14340 SW 164th Ave Tigard 97224	503-590-9981
22.	Mark McDonnell	3069 SW Dickinson PDX 97219	503-295 1031
23.	Chad McCord	16596 SW 10th St Sherwood 97140	

6

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

	Name	Address	Phone
1.	[illegible]	Tualatin	503-679-0503
2.	[illegible]	Tigard	503-956-3939
3.	[illegible]	Beaverton	503-524-4108
4.	Francisco Fregoso		503-515-4991
5.	Jose Luis Gomez		503 977 53 99
6.	Jill Rogers	Tualatin	503 702 2185
7.	NICOBERTO GARCIA	PHON	503 538 4501
8.	Jose Lopez	Beaverton	503 501 8202
9.	Lorenzo Angel		503 998-75-36
10.	Bonnie [illegible]	Tualatin	503-421-0719
11.	JEFF STEWART	BEAVERTON	503-244-7599
12.	RICH CLARK	BEAV.	503-635-0773
13.	Francisco Jimenez	TIGARD	503 422-0887
14.	M WETZEL	PORTLAN	503 245-7749
15.	Rolando HERERA		503 443 5314
16.	Reye Robles	Beaverton	503 952-6497
17.	OMAR MOLINA	Tigard	503 664 6913
18.	Dmitriy Yevseyev	Tigard	503-927-7099
19.	Victor Ulloa	Tigard	503-706-7328
20.	Lázaro Pérez	Beaverton	503-706-7064
21.	ANDRE VAOGHAN	TIGARD	503 330 5802
22.	Jorge Ponce	Tigard	503 702 2438
23.	KURT SORY	TIGARD	503-705-5139

7

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

	Name	Address	Phone
1.	Sonia Estrada	6725 SW Queenlan Beaverton OR	(503) 995-1694
2.	Tom Nair	13430 SW Ute Tualatin	97062
3.	Basilio Ramirez	802 E 9TH ST #1104 NWBG	(503) 954-0344
4.	Martin Garfias	Aloha	
5.	John Behrends	Portland, OR	
6.	Babak Rad	Lake Oswego OR	
7.	Mark Tedder	Tigard, OR	
8.	Keith Collins	Sherwood, OR.	
9.	Nadine Johnson	Tigard, OR	
10.	Kerry Benedict	Tualatin OR	
11.	Pedro Gamez	503-656-0848	
12.		Gladstone OR	
13.	[illegible]	Portland Oregon	(503) 351 2000
14.	Victor Vargas	Tigard	503 9976821
15.	Felipe Gonzalez	7934 SW Portland	5039014237
16.	Gabriel Garcia	12515 SW Pathfinder Ct Tigard	503 875-1325
17.	Elvir Nova	Beaverton	(503) 7402615
18.	[illegible]	2633 SW Huber St Port	503 452-9312
19.	[illegible]	9840 SW 55 Ave Portland	
20.	Steve Curran	Sherwood OR	503-334-7465
21.	Everardo Mendez	Beaverton OR	503-4811590
22.	Bill Williams	Beaverton OR	5037405678
23.	[illegible]	Woodburn OR	970717 503 9803208

8

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

	Name	Address	Phone
1.	Jeff Anderson	14800 SW 144th Ave, Tig	503-277-9845
2.	Joseph Atkinson	10850 SW. 60th Ave 97219	503 246-2961
3.	Geoff Boice	Tigard, OR 97224	503-579-4507
4.	Omar Torres	Woodburn OR	503-470-57-12
5.	STEVE FARRAR	20400 SW. BOONES FERRY	
6.	"	Rd, 503 3149243	
7.	Shel Reed	14235 SW 89th Tigard OR, 97224	503-348-4551
8.	Charles Adelmann	Portland OR 97221	503-737-9700
9.	Jesus A. Gongora	Ballote Hillsboro or. 97123	(503) 844-49-80
10.	David Aguilar	Beaverton	(503) 5737064
11.	Richard Dickson	18325 FERNBROOK ct. L.O.	503-639-5719
12.	Bill Rodby	14240 SW, Pacific Hwy Tigard	503-684-2727
13.	John Lauckin	2420 SW. CREEKDALE, PAX, OR	503-297-1957
14.	Scott Rankin	Portland, OR 97223	5033619130
15.	Luis Atilano	217 S locust st	503 984 5730
16.	Omar Rivas	1102 Springbrook ~~Newberg~~ rd Newberg	971 276 9829
17.	Juan J Brad	Sherwood, OR	503 582-97-00
18.	PAUL JACOBSON	7025 SW IVY LANE PORTLAND	503 267 3785
19.	Mark Ochsen	238 5TH Street Lake Oswego OR	503 697-7916
20.	Tom Collins	6670 SW Princess Ave Beaverton OR 97008	(503) 900 0541
21.	EDGAR OADILLA	11595 SW 117TH BEAVERTON OR. 97005	
22.	Chris Hald	16316 SW Luke Lane, Tigard, OR 97223	
23.	GEORGE RICH	7879 NE 56TH AVE, HILLSBORO, OR 97124	

9

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

Name	Address	Phone
1. Miguel Guzman	Hillsboro OR	503-7509560
2. Sione Naaniumpt	10450 SW McDonald St #35	
3.	Tigard ore. 97224	
4. Saul Espinoza	13111 SE Nixon Ave Milwaukie 97222	503-764-7049
5. Dook Goo Lee	11695 SW Nicoli Pl. Tigard or.	1971-503-3626
6. Juan Garcia	303 Cambridge dr Newberg OR	503-317-4256
7. Pablo Garcia	303 Cambridge dr Newberg OR	
8. Bruce A. Knudsen	7712 SW Ashford St	503-706-9134
9. David Bjerg	9065 SW 77th Tigard OR 97223	503-244-8195
10. Sele Flores	705 SW Concord way Beaverton Or 97006	503 2709297
11. Jose Santos Fernandes		503-951-3935
12. Greg Wagner	6210 SW Lake View Blvd.	503-740-3463
13. John Carter	11295 SW Churchill Wilsonville	503-410-1501
14. Salvador Delgado	8581 SW Merlyne Ct Tigard Or. (503) 319-3184	
15. Ken Johnson	13620 Beef Bend Rd #6	503-524-2075
16. Ed Becker	1058 SE Leander St Hillsboro	503-310-2268
17. Kimberly Wheeler	7925 SW Nyberg Rd Tualatin	5037137097
18. George M Lopez	5647 SW Wilbard ave 97219 PDX	
19. [illegible]	11763 Daffodil 97140	503 828 4421
20. John [illegible]	1125 Campbell Ave	
21. [illegible]	12268 SW Rembrandt Ln Tigard OR 97224	503 5962409
22. Chris [illegible]	5628 SW Garden Home Rd	503 656-6469
23. Vicente Durazo		503-449-5727

10

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

Name	Address	Phone
1. Kris Carlisle	16016 SW Westminster Drive Tigard	(541) 543-9563
2. Francisco Salah	19774 SW 67th Ave Tualatin	(503) 531-1550
3. Michael Long	401 NE 12th Ave, Canby, OR 97013	503 263-7423
4. Erich Brenner	8880 SW Hillman Ter. Port. OR 97225	503-729-7089
5. Pat MOAR	4114 SW Flower St Portland OR	503 244 3018
6. MARTI Lituczy	4114 SW Flower ST Portland OR 97221	503 244-3088
7. Steve Mercer	12252 SW Quail Creek LN Tigard, Or	503-261-3128
8. KARL HOFFSES	19836 SW GASSNER RD BEAV. OR 97007	
9. Landscaping gardening	16611 umbenhauer LN Aurora OR	503 981-2358
10. Sam Lockling	17445 SW 131st Ave, Kingcity	
11. TOM STOTT	15365 TWIN FIR RD L.O. OR	503-709-0700 503-968-1071
12. BRUCE REDDICK	8655 SW BRIDLETRAIL AVE BEAVERTON	(503) 476-5414
13. Lance Trantham	24500 NE Hummingbird Cr. Newberg OR	(503) 537-4047
14. Larry Fleischman	8108 SW 187 St Ave Beaverton OR	503-692-3735
15. Juan Carlos	P.O. BOX 23022 Tigard OR 97281	9712265596
16. STAN APPERSON	3500 SW 44th PDX 97221	503-292-1815
17. EARL BURNSIDE	1020 NW 9TH Ave Portland	
18. JOHN MORRISSEY	14175 S.W. CHERRY HILL DR BEV. 97008	
19. PAT MORAN	12710 SW JENNETT CT BEAVERTON	503-701-9387
20. Scott Bruckner	16170 SW Pollard Ln Tigard	503-259-0906
21. ALFONSO ELIAS	503-572-4368 10240 SW NIMBUS AVE L7 PORTLAND OR 97223	
22. Paul Strickland	503-880-3548 13455 SW Cougar Ct.	
23. Helen Wu	503-706-1276, 9023 SW Terwilliger Blvd.	

11

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

Name	Address	Phone
1. Patti McKeen	17820 SW Heatherwood Lane Sherwood OR	503 341 6191
2. Travis Nordseth	19009 SW Gassner Rd Beaverton	971 226 [illegible]
3. Carolyn Richmond	15028 SW Scarlett Dr Tigard	503-524-4391
4. [illegible]	4707 SW MAPLEWOOD RD PORTLAND OR	
5. CHARLES GRIFFIN	14175 SW 93RD TIGARD, ORE 97224	
6. Jonathan Digby	10090 SW Serena way Tigard, OR	503 327-1558
7. Eric V [illegible]	6525 SW Lowell St Tigard OR	503-452-2424
8. Chris Zimmerman	6289 Carman Dr Lake Oswego	503 890 8974
9. Jeff Roberts	14908 SW Scholls FY RD. 1803- 97007	
10. Abel Cisneros	3399 SW 125th ave Beaverton OR 97005	503 616-0077
11. All Seasons Guardening Ser	P.O. Box. 5576 Beaverton OR 97007	503 593 6277
12. Ed Habelle	One Bunerman Dr. Beaverton	503-671-2618
13. ROBERT KAPELA	45 NW 101st PORTLAND OR	503-291-7943
14. Kay F Shulman	11450 SW Jackie Ct Tigard OR	503 591 5223
15. R. [illegible]	11450 SW Jackie Ct Tigard OR	503 591-5223
16. Sophal Sam	12010 SW Treeview Ct.	(503) 639-2798
17. Chris Krivens	22464 SW 107th Ave Tualatin OR	503 691 6108
18. [illegible]	22497 SW 107th Ave Tualatin, OR	(503) 691 9707
19. Rick Apan	14890 SW. Junvicula	503.590.4165
20. Tom Brynelson	6365 SW Shakespeare LO 97035	(503) 620-7527
21. ANDREW CONRAD	12925 SW 132ND AVE TIGARD OR 97223	541 740 5224
22. William Britton	15385 SW 79TH AVE. TIGARD.	503 598 8478
23. Cheryl McGinlay	12640 SW 135 Tigard	503 709 3340

12

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

	Name	Address	Phone
1.	Daniel Gransdahl	7582 SW 195th PL	97007
2.	Mark Fieldhouse	9285 SW. Inez St.	97224
3.	John Etzel	10836 SW Dover Ct Tigard, OR	97224
4.	Dan Lamb	15880 SW 79th Tigard OR	97224
5.	Michael Donovan	8080 SW Larch St Tigard OR	97223
6.	Roger Spriggs	13240 SW Burnham Ct Tigard OR	97223
7.	Adam Craig	16464 SW Cornus Ct Sherwood OR	97140
8.	Reggie Stymeier	221 NE 3rd Ave Canby OR	97013
9.	[illegible]	13345 SW BARBERY LN, BENERTON	97008
10.	[illegible]	6040 SW Cross Ck Dr Aloha OR	97007
11.	[illegible]	1147 NW. Weybridge Way Bend OR	97006
12.	[illegible]	11580 SW Greenburg Rd Port OR	97223
13.	[illegible]	15025 SW CABERNET DR. TIGARD, OR	97224
14.	Tony Fidanzo	16603 NE Umbenhour Ln Aurora OR	97002
15.	[illegible]	3316 SW Arnold Hghts	97219
16.	Joe Godfrey	8950 SW Reiling St. Tigard OR	97224 503 624 2374
17.	Russ Sprouse	17780 SW SHANNEE TRL. TUALATIN,	97062
18.	Juan L Torres	1426 NE GRANDHAVEN ST McMINNVILLE	7128
19.	[illegible]	3360 STEVEN ST Woodburn OR	97071
20.	Brian Bartunek	3339 N.E. SCHUYLER	971-302-8514
21.	Katie Stenkel	730 SE 88th Port OR	97216 503-309-7202
22.	[illegible]	4778 Avery Lane LD	97035 503-744-0959
23.	Benjamin Ruiz	(503) 754-5888	

13

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

	Name	Address	Phone
1.	Matt Goddard	P.O. Box 36 Corbett	97019
2.	Kathryn Tenhoopen	48000 Larch Lnt, Rd. Corbett	97019
3.	Chuck Farse	12855 SW 113th Tigard	97223
4.	Doug Biladoa	12895 SW 113th Tigard	97223
5.	Bob Meurisse	14145 SW 164th Tigard	97224
6.	Derrene Meurisse	14145 SW 164th Ave Tigard	97224
7.	[illegible]	2524 SW Troy St Portland	97219
8.	Jorge DeLeon	15125 SW Viking Ct Beav.	97005
9.	Mike Ober	12650 SW Pacerway Beaverton	97008
10.	Robert Meath	17910 NW Tora St	97006
11.	Theodore Hamilton	15380 SW 109th Ave	97224
12.	Phil Poole	12250 SW King Arthur Port	97224
13.	Ed Anderson	14005 High Tor Drive Tigard, OR	97224
14.	Bill Dwyer [illegible]	6600 SW Ventura Dr Portland	97223
15.	Rich Turner	7059 SW Barbara La Tigard, OR	97223
16.	Drew Stampley	501 Pinehurst Dr. Newberg OR	97132
17.	[illegible]	(971) 732-0514	
18.	Hugo Saavedra	(971 570 1310)	
19.	Patrick Carter-North	(503-333-7384)	
20.	Robert Stirton	503-641-3755	
21.	Kevin Finck	22118 SW Hail Pl Sherwood Or	
22.	Terrence Boyd	14390 SW 130th Ave. Tigard	97224
23.	John Gronsdahl	7582 SW 195th Pl, Beaverton	97007

14

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

	Name	Address	Phone
1.	[illegible]	16763 DAFFODIL ST SHERWOOD OR 97140	503 828 4421
2.	Steve Jensen	9995 SW Garnett ST Tigard	503 805 0502
3.	[illegible]	PO Box 20882 Keizer OR 97303	503 9828824
4.	[illegible]	5971 SW BRUGGER ST, PDX.	503 956-2923 97219
5.	[illegible]	7614 SW OAK ST, TIGARD	97223
6.	JUSTIN SNODGRASS	14680 SW 83rd Ave Tigard	97224
7.	Tony Zamora	1115 SE Morgan Rd VANC. WASH.	503 754 5975
8.	Kelly Fitzpatrick	9350 SW 175th Ave, Beaverton	97007
9.	Jose Avila	22665 SW Cochran OR	503 476 5785
10.	Vicki Paneban	11750 SW 9th Beaverton OR	97005
11.	J J Blum	6145 S.W. McEwan Rd L.O.	
12.	[illegible]	6348 SW Seymour ST	97221
13.	[illegible]	6705 SE Drake Hills [illegible]	
14.	[illegible]	9915 SW 80th Ave	97223
15.	[illegible]	17977 SW FREDERICK LN	97140
16.	Anne Fertitech	8755 SW 80th Ave Portland, OR	97223
17.	A. Easley	965 D ST NE SALEM OR	97301 480-9110
18.	Damon Sarant	13194 SW Yarrow Way Tigard	503-226-6627 97223
19.	[illegible]	14150 SW 162nd Ave TIGARD OR	97224
20.	[illegible]	12395 SW Corylus Ct., Tigard OR,	97224 James Walker
21.	[illegible]	15065 SW 103rd Ave, Tigard OR	97224 503-704-3973
22.	[illegible]	15065 SW 103rd Ave Tigard OR	97224
23.	[illegible]	9955 SW Sattler ST Tigard OR	97224

15

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

	Name	Address	Phone
1.	Dan Johnson	2506 S.W Moss St	503-330-8745
2.	Julie Klink	8514 SW 46th Ave	503-754-9332
3.	RAY ROSS	4413 THUNDER VISTA LO.	503 318 3385
4.	Victor Vertrees	8265 SW Carmel Ct Ptld	503 245 3809
5.	Phyllis Vertrees	8265 S.W. Carmel Cr Ptld	503-245-3809
6.	Perry Taylor	6118 SW Nevada Ct	503-439-6866
7.	Zach Price	9027 SW 52nd Ave	503-522-2233
8.	Keith Nelson	16350 SW Palermo Ln	503-962-0908
9.	Jacob Wells	16350 SW Palermo Ln.	503 756-7569
10.	Max Leon	25180 SW 65th Ave Tualatin	503 730 0653
11.	JAMES FORSTER	16164 N. PARKER LO 97035	503-320-5584
12.	BEN ROOT	9100 SW IBACH CT TUALATIN 97062	503-810-2095
13.	Julian Bautista	14145 Butteville Rd. Woodburn OR 97071	503 989-1940
14.	Gordon Hickey	11931 SW Dickinson Ct, Ptld, OR 97232	503-475-4283
15.	Brian Thoma	2721 SW Humeci Portland OR 97219	503 8665366
16.	[illegible]	30773 SW LAURELVIEW RD, HILLSBORO	503-628-4248
17.	[illegible]	16120 SW Grimson Ct Tigard	
18.	[illegible]	9590 SW HIALEAH DR BEAVERTON, OR 97008	
19.	Luis Joel Garcia	12850 SW Allen Blvd #D Beaverton OR 97005	
20.	Ken Cook	10710 SW North Dakota St Tigard OR 97223	
21.	David Schick	10230 SW Anderson Ct Tualatin OR 97062	
22.	Rosina Schick	10230 SW Anderson Ct Tualatin 97062	503-885-7806
23.	KARL SCHULTZ	12450 SW FISCHER #136	503-957-4254

16

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

	Name	Address	Phone
1.	Jose Velasco F/Ores	14862 SW 106 Av. Tigard OR.	(503) 502-8251
2.	Armando Hernandez	10115 SW Walnut St Portland OR	503 780 1764
3.	Gero Lopez	341 SW 13th St Dundee OR 97115	503 538 7072
4.	Jose Oregon	10405 SW Denney Rd #84, Beaverton OR. 97008	(503) 332-010
5.	Steve Schoffler's	17381 SW Kemmer Rd, Beaverton OR 97007	503 579 5753
6.	David G McLean	1230 SW Freeman St Portland OR 97219	503 977 2054
7.	Joseph Csige	15011 NW 21st Ave Vancouver WA 98685	503 505-8442
8.	Dean Kampfer	3114 Douglas Circle	503.344.6653
9.	Tracy Kneger	23358 SW Pine St Sherwood	971-832-2664
10.	Carol Briggs	14619 SW Brickyard Dr	503 935-0983
11.	Scott Slanosky	13675 SW Pommel Cd Bvtn.	503-419 7600
12.	[illegible]	11228 SW Morgan Ct Tigard	97223
13.	[illegible]	20405 SW 216th PL Sherwood	92140
14.	Jill Faulmann	20405 SW 216th PL Sherwood OR	97140
15.	Juan Bautista	798 Evergreen Rd 49 Woodburn OR	97071
16.	Victor Unkow	4255 SW 91st Ave. Portland OR	97225
17.	Mark Cederberg	10567 S.W. Kent Tigard Or	97224
18.	Cindy Cederberg	10567 SW Kent St Tigard Or	97224
19.	Roy C Hyde	17060 S.W. Chatelain, Aloha OR	97006
20.	Diner Brown	18375 SW Delores Ln Beaverton OR	97007 503-935 7586
21.	[illegible]	8685 [illegible] Sargent St #48	
22.	Heather M. Baldwin	750 SW 83rd Portland OR 97225	Waterloo OR 97066 503 6147163
23.	[illegible]	14915 SW 102 Tigard OR	503 8870390

17

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

	Name	Address	Phone
1.	michael a Musselman	22183 SW Kelsey Ct	(503) 625-5335
2.	Jose Del Cid	5771 SW Oleson RD	971 645 8659
3.	Cesar Alegria	5771 SW Oleson RD	971 226-4504
4.	Andrew Dutra Sr	17665 SW Elderview Dr Sherwood	971 255 7484
5.	Andrew Gilliland	8674 Teton Rd.	971 888-3879
6.	[illegible]	8320 SW 41	503-244-3722
7.	Robert [illegible]	10687 SW Blackmarsh Tigard	503 810-0597
8.	[illegible]	6905 SW 158th Ave, Beaverton, Or.	503 644-3674
9.	Kathi Kennedy	5575 Bonita Lake Oswego	503-702-8162
10.	[illegible]	P.O Box 284 Newberg	503-953-8648
11.	Ismael Arias	P.O. Box. 224 Hubbard Or.	97032
12.	Jim Sollers	PO Box 44 Lake Oswego	(503) 951-3935 503 984-7719
13.	Raul Vargas		
14.	Gabriel	Guonaca	
15.	Jose Segura	1658 Lucinda Ave Ne Keizer Or.	503-608-0494
16.	Juan Saavedra	11983 Tualatin rd Apt 826	(503) 270-1248
17.	Manuel Mandujaro	11775 SW 134th Terrace Tigard Or	(503) 351-2205
18.	[illegible]	(503) 312 4155	
19.	[illegible]	(503) 3 3305513	
20.	[illegible]	18503 NW Heritage PKWY #203, Sos	8666112
21.	[illegible]	9527 SW Brooklyn Lane Tigard OR 97224	
22.	Chris [illegible]	11760 SW [illegible] Beaverton OR 97005	
23.	SILVIO ALVAREZ	(971) 2120629	

18

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

Name	Address	Phone
1. R. D. MARTIN	3115 SW CAROLINA ST. PORTLAND OR. 97239	503 452-5704
2. Scott Eppinger	5150 SW Dover Lane Portland	503 970 8777
3. Glenna Dreboy	4320 SW Stoddard Dr Aloha	503-208-0909
4. Greg Garrison	8443 S.W. 35th Ave Portland OR 97219	503 756-7777
5. B. R. LaFord	10925 SW 58th Ave Portland OR 97219	503-246-1440
6. William E. Whitehead III	9230 SW View Terrace, Tigard, OR 97224	
7. MILTON H CRUTCHFIELD	5200 SW alfred st Portl. OR	
8. Chris Miller	8345 SW Colony Creek Ct Tigard	971-270-8595
9. KEVIN SWEET	1045 SW TAYLORS FERRY RD PORTLAND 97219	503 332 4171
10. Brad Lindsley	1057 NE LINCOLN ST	971-244-3780
11. Casey Muchmore	13240 SW Roy rogers rd	(503) 756-2110
12. Scott Rowland	8790 SW Turquoise Loop 97007	503-504-1037
13. ADRIAN CHACON	6615 SW CANYON LN BEAVERTON OR 97225	
14. Miguel Jaquez	12625 SW HALL BLVD TIGARD	
15. Pat Allaire	9255 SW Inez St. Tigard	97224
16. David Soulis	8017 SW Pine Tigard	97214
17. Ray Dingfield	P.O. Box 4944 TIGARDVILLE	503 250 1346
18. Heart of Landscape Yard Care LLC	owner DAN CNZ	(503) 431-1793
19. Trevor Thompson	4375 19th Ave Cornelius, OR	503-839-4774
20. Jeff Nokes	14600 SW 103rd Tigard OR	503 639 1467
21. [illegible]	17313 S.W. Sugar Plum Ct 97007	503-916-9167
22. Philip Hickey	P.O. Box 4524 Tualatin 97062	503-356-5556
23. Jeffery McCardin	580 SW 1st St #1 Lake Oswego OR	619-890-[illegible]

19

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

Name	Address	Phone
1. Howard Hermanson Jr.	9738 NW Ash St. Port	503-807-8282
2. James Davis	6535 S.W. Miles CT	503 980 5972
3. [illegible] Bopp	10270 SW Davies Beaverton	503-579-4141
4. Jeanette Bopp	10270 SW Davies R. Bea	503 579-4144
5. Jered Coates	14270 SW 97th Ave	503-898-9453
6. John Nicholas	1987 SW Montgomery Pl Portland 97201	503-232-1299
7. Joe Tesadula	22396 SW 111th Ave Tualatin	503 486-5484
8. Jeremy Meyer	8769 SW Hamlet St Tigard	503 575-5704
9. James R. Berg	6015 S.W. 90th Portl.	503-292-8263
10. Ralph B. Berg	" " "	
11. Taylor Davis	6975 SW Barbara Ln Tigard OR 97223	503-407-6477
12. Travis Rosenquist	9945 NW St Helens PDX 97231	
13. David Roys	10135 SW 135th ave Butn, OR	503-619-5011
14. Rick Barton	13840 SW 31st ct Butn OR 97008	503 730 9137
15. Kevin Paul	7035 SW 54th Ave PDX 97219	
16. Eric Anderson	5161 S.W. Mitchell Portland OR	
17. Casey Martin	6969 N Montana PDX 97217	
18. Jim Rosel	9645 SW North Dakota Tigard 92223	
19. Kim Vandeberg	17675 S. Cottonwood Alpha 97007	
20. Chris Olson	8925 SW Camille Terr., Portland OR 97223	
21. Jim McCullough	18980 S. Springwater Estacada	
22. Ryan Frazier	6912 SW Taylors Ferry 97223	
23. [illegible]	3654 SE Grogan Ave 97222	503-975-2331

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

	Name	Address	Phone
1.	Brian Welsh	6522 SW Florence Ln	503-804-7223
2.	[illegible]	10365 SW Coaville Dr	503-467-1402
3.	[illegible]	20676 SW Elk Horn	503-692-9206
4.	JEFFREY SCHULTZ	5741 SW PASADENA DR. PORTLAND 97219	503-504-3264
5.	Warren Sullivan	17705 SW 112 TUALATIN OR 97062	971-227 2634
6.	Jenn Sullivan	17705 SW 112th Ave Tualatin 97062	503-686-5249
7.	Wally Meinrodes	58688 Louie Ct St Helen 97051	503 913-0434
8.	DUSTIN UPPIN	8824 SW TALANA DR TUALATIN OR 97062	(503) 883 8880
9.	Chris Barker	6400 SW 46th Ct. Portland 97221	503-740-0001
10.	John Hone	9563 SW Ings Tigard OR	503 327 5059
11.	Kyle Holland	9936 SW Alsea Dr Tualatin	989-2671
12.	Richard Anderson	11553 SW Shoreview Pl Tigard	579-2140
13.	Douglas E. Muench	30950 SW Fir Ave. Wilsonville	382-7594
14.	Steve Brady	10200 SW Wasco Way Tualatin	503 757 2420
15.	Donald Matson	9540 SW Killarney Tualatin	503 692 3917
16.	KURT AUSTIN	12285 SW [illegible] Ct. TIGARD	503 590-3764
17.			
18.			
19.			
20.			
21.			
22.			
23.			

21

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

	Name (full signature)	Address	Phone
1.	Robert Stirten	11770 S.W. 13th St.	503-641-3755
2.	Brian Stanfill	14990 SW 137th Pl. 97224	503-805-1141
3.			
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23.			

PENCE Holly

From: John & Kathy [maherjk@comcast.net]
Sent: Tuesday, November 19, 2013 19:55
To: PENCE Holly
Subject: Public Comment for Grimm's Fuel Permit

Holly,

Thank you for extending the comment period on this matter. My wife Kathy and I attended the public hearing and must say that it was very eye-opening and we were happy to see that there are a number of individuals in the Tualatin area that share our concern around the composting permit for Grimm's Fuel. We know the odor itself is a problem which seems to be getting worse but it was very concerning for us when we heard of the possible health effects of living here and the potential health effects associated with the addition of other feedstock at this facility is downright frightening.

After retiring from the military my wife and I moved to Oregon in 2004. Tualatin sounded like a wonderful location to live and we bought our current home that year. You should know that if we had known about the frequent odors, not to mention, and especially, the potential adverse health effects that come from Grimm's Fuel Company we never would have bought at this location.

I understand that Grimm's has been around for years but I also know that when it was originally located here it this was a rural environment. Our housing development was built just across OR99W from Grimm's around 1997 and there are now apartment complexes, other housing developments and several large buildings constructed for office space and manufacturing. Seven of these have been built in just the last few years. Unfortunately, most of these are currently sitting vacant.

As the City has allowed this area of Tualatin to become more urbanized I feel that with the amount of odor emanating from Grimm's as well as other associated hazards that this is no longer a viable location for their process. I don't like the idea of a business closing or relocating but I can't help but feel that one of the reasons that these seven new facilities are now largely unoccupied is due to the odor produced from Grimm's. This thought was given support by a realtor during the public hearing.

Even if this permit is renewed, I sincerely hope that their operation is not allowed to expand in any way. There are already too many days, beautiful days, when we cannot even open our windows to let in fresh air due to the poor air quality caused by the odor from Grimm's. My hope would be that this Grimm's facility would relocate to a more rural area as other excessive odor producing businesses have had to in other instances of urban expansion as I feel that it is unacceptable to have a facility like this so close to residential areas and professional business offices. I think it is appalling that a facility like this cannot be located near a school yet it is considered acceptable to have it near residential areas where individuals ranging from children to the elderly are exposed to the noxious odor and ill health effects twenty-four hours a day. We have already discussed the option of selling our home here and moving somewhere else before there is no market for homes in this area. This should be a concern for the City…the health and livability of all of their citizens.

Thank you for your consideration and I hope that the DEQ will make a responsible determination on this matter. I understand the permit will be awarded but I am hopeful that the conditions of the permit are such that it would be impossible for this facility to expand.

John & Kathy Maher

FAX COVER SHEET

Jan Fourier
P.O. Box 1032
Lafayette, Oregon 97127

503 435-2956 Office
503 435-2747 FAX
503 550-2296 Cell

Send to: DEQ Northwest Region	From: Jan Fourier
Attention: Holly Pence	Date: 11-19-13
Office Location: Portland	Office Location: McMinnville, Ore
FAX Number: 503-229-6957	Phone number:

Total pages including cover: 3

Comments:

Public Comment Grimm's Fuel Compost Site

Tuesday November 19th, 2013

Holly Pence
Solid Waste Permit Coordinator
DEQ Northwest Region 2020 SW 4th Avenue., Ste. 400
Portland, Oregon 97201

Grimm's Fuel Compost Site

I appreciate the opportunity to make comments on the proposed changes to the Grimm's Fuel Composting Permit.

I am adamantly opposed to changing their composting permit to include additional waste.

In your information (About the facility) you talk about an updated operations plan to prevent environmental issues including offsite odors. Since the start in 1999, and including changes in 2009 and 2013, there has been NO improvement in offsite odors.

In your compliance paragraph you talk about water quality and odor issues, that should be resolved "to the maximum extent practicable". Again, since 1999 there have been NO improvements to the ordor issue, practicable or not.

If a person buys land and builds a home or business next door to a dairy, then they shouldn't complain about a dairy order. Such is not the case here. I have owned, lived for numbers of years, and developed my land for commercial use just across 99W from Grimm's Fuel since 1969. Thirty years prior to their development in 1999. My water source was then, and remains today from a domestic well on my property. The air source until 1999 was wonderful and normal. All the monitoring for compliance, including your changes in 2009 and 2013 has not been successful. Come by and take a smell sometime.

If you lived or worked next to Grimm's your statements on compliance would be of little comfort to you and your family for they have been much less than successful.

There are numbers of homes and families, a mobile home park, an Old Age facility and numbers of businesses located within the ordor area of Grimms as it is today. Please don't make an already bad situation worse and turn this area into something you only hear about on 60 Minutes.

Thank you for your consideration.

I represent Map 2S121A - 01700
Map 2S121AB 900
Map 2S121AB 800
Map 2S121AB 700
Map 2S121A 01200

Properties located directly across Hwy 99W from Grimm's Fuel

Jan J Fourier
503-560-2298

PENCE Holly

From: R B [rockybixby@hotmail.com]
Sent: Tuesday, November 19, 2013 12:53
To: PENCE Holly
Subject: Grimm Fuel

Holly i know you are probably tired of receiving emails about Grimms, but please help us at pony Ridge. Try to picture it if you and your family lived next to a cattle farm. Smelling manure all day atleast weekly is to much. We should have the right to live here in this area, and not have to move because of the smell from Grimm's. Our homes in this aeea are valued anywhere from $245,000-$265,000. Our values will drop if this area becomes unliveable due to the smells coming from Grimm's. It is embarrassing to have friends or family visit and it smells like a pasture outside. Please we are begging you not to allow Grimm's to be allowed any license to make our living conditions any worse. We would like to be kept abreast of any updates regarding this issue.

Thank you,

Rocky & Cheryl Bixby
18126 sw 133rd terrace
Tualatin,Oregon 97062

PENCE Holly

From: Kat Taylor [katinoregon@gmail.com]
Sent: Tuesday, November 19, 2013 10:13
To: PENCE Holly
Subject: Grimm's Fuel Co. - Food Composting Application Denial Request

I am writing as a homeowner in the Pony Ridge Development in Tualatin. My home is across Highway 99W from Grimm's Fuel Co. I am affected on a daily basis by malodorous smells emanating from this site.

As such, I am requesting you to not allow Grimm's Fuel to accept and/or process any food waste whatsoever.

Since purchasing my home seven years ago the number of days where there is a foul odor have increased markedly. It has affected my quality of life in my neighborhood. The putrid smelling odor affects my ability to use and enjoy the outdoor areas of my home.

North Plains citizens are dealing with this very issue and we do not want to take on this nightmare. These food composting activities should be done in less populated areas and not near homes and businesses.

Until the technology exists to eliminate ALL odors I vote for denial of all food composting activities in urban areas and especially at Grimm's Fuel Co.

Thank you,

KAT

PENCE Holly

From: George Vigileos [vigileos1@yahoo.com]
Sent: Monday, November 18, 2013 21:25
To: PENCE Holly
Subject: Grimm's Fuel Application for Solid Waste Composting Permit

To: DEQ Northwest Region
Re: Grimm's Fuel (expanded) Composting Operation

I must assume that we are among a significant number of impacted citizens expressing our concern and opposition to the issuance of a new permit, and urge that DEQ not approve this permit for Grimm's Fuel Company.

Most of the open questions and concerns expressed by impacted residents and businesses have already been substantiated to be well-founded. No less troubling, some open questions remain unresolved, and there has been no credible argument put forth to dispel even those scenarios with worst case outcomes.

My fear is that DEQ will perform in a manner it is gaining a reputation for -- essentially, providing only perfunctory oversight, acting as nothing more than a shallow speed bump for the well-connected beneficiaries of its 'decisions'. But my hope is that DEQ will dump the rubber stamp, and regulate honestly, fairly and transparently.

Public sentiment is not only overwhelmingly opposed to this permit, public sentiment is in the right in opposing it. The proposed composting operation permit, at this time, at this location, is conspicuously misplaced.

Please reject this permit request.

Respectfully,

George Vigileos
18230 SW Shawnee Trail
Tualatin, OR
503-612-6994

PENCE Holly

From: ann vigileos [anniekv7@yahoo.com]
Sent: Monday, November 18, 2013 19:20
To: PENCE Holly
Subject: Grimm's Fuel Permit - Public Comment

Thank you for this opportunity to voice my opinion on the proposed composting permit for Grimm's Fuel in Tualatin.

I have lived in Tualatin for 10 years, on the north side near the corner of Herman Road and Tualatin Road. Many of my local errands bring me to Hwy 99, either to drive to Tigard or to Sherwood. I have experienced, first hand, the odors coming from Grimm's both here at my home, when walking the nearby neighborhoods, and also when driving along Hwy 99. At certain times of the year and certain times of the day, those odors are very strong and noxious.

It is my understanding that this proposed permit will allow Grimm's to add Type 3 Feedstock to what they already do there now. This is a **mistake**, as probably anyone in North Plains will tell you. As you must be aware, Grimm's is not located out in the country, miles away from anybody and anything - they are located in a populated area, and what they do in the way of composting and the resulting odors has a definite and negative effect on those who live and work nearby. This odor problem can be a real problem with just the type of composting they do now - I shudder to think of what it will be if they add the Type 3 Feedstock. I live here, this is my home, and I'd like to be able to enjoy my back yard and my neighborhood walks without having to smell all variety of rotting things.

I have read through the Draft Site Permit, and I do see that some checks and balances are in place - most of which have to do with intermittent testing and responding to odor complaints. But why should we, as homeowners or business owners, have to be the vigilant ones who have DEQ on speed dial? And, if I complain about odor that has chased away a prospective buyer for my house, what good will that do? If the odors spoil a special occasion back yard party, what good will a call do then? The damage will already have been done. Additionally, I do see that this permit will be effective for 10 years. I don't think it should be granted **period**, but granting it for a 10 year period is ridiculous. There are lots of ugly things that can get a toe hold in Tualatin (smells, rodents, groundwater contamination, etc.) in ten years that might never be eradicated.

I ask that you **deny** this composting permit.

Thank you.

Annie Vigileos
18230 SW Shawnee Road
Tualatin, OR

PENCE Holly

From: lowerpugetsound [lowerpugetsound@comcast.net]
Sent: Monday, November 18, 2013 10:07
To: PENCE Holly
Subject: DEQ Draft Composting Permit, Grimms Fuel Co. Tualatin, OR
Attachments: Tualatin-Grimm-DEQ 11-18-2013.doc

2222 63rd Ave NW
Olympia, Washington 98502
360 866 9201

November 18, 2013

Holly Pence
Solid Waste Permit Coordinator
DEQ Northwest Region
2020 SW 4th Ave, Suite 400
Portland, OR 97201

Subject: DEQ Draft Composting Permit, Grimm's Fuel Company, Tualatin, OR

Dear Ms. Pence,

I am writing on behalf of members of Gair Properties LLC (GP, LLC) opposing the proposed permit, authorizing Grimm's to compost "Type 3 Feedstocks," to go forward. GP, LLC owns a parcel of land directly across Highway 99W from Grimm's boarded by Cipole Road. Our property is downwind of Grimm's open air composting business. At present time the odors are noxious, which only would get extremely worse if dead animal carcasses can be added to the mix of composting.

The present activities of Grimm have proven adverse in our efforts in selling our property. Our property is zoned for medical, dental, retail developers, or any office type companies. When a perspective buyer visits our parcel they are put off by the noxious odor that blows onto our site from Grimm's place of composting business, they walk away. Therefore we are in extreme opposition of expanding Grimm's petition of expanding their operations to include "Type 3 Feedstock"

We appreciate the fact that Grimm wants to expand their business; but they are now in an urban area, which affects more people. Since they have an outdated open-air composting method with no plan of odor control we request, as immediate neighbor landowners, that the application of expansion/addition of animal parts be denied by DEQ.

Yours truly,

Ginnie Pearsall
Manager Gair Properties LLC

600 NE Grand Ave.
Portland, OR 97232-2736
www.oregonmetro.gov

DEPT OF ENVIRONMENTAL QUALITY
RECEIVED
NOV 8
NORTHWEST REGION

DEPT OF ENVIRONMENTAL QUALITY
RECEIVED
NOV 18 2013
NORTHWEST REGION

Metro | *Making a great place*

November 12, 2013

Holly Pence
Solid Waste Permit Coordinator
DEQ Northwest Region
2020 SW 4th Ave., Ste. 400
Portland, OR 97201

RE: Proposed DEQ Solid Waste Permit for Grimm's Fuel Company Composting Facility

Dear Ms. Pence:

Thank you for the opportunity to comment on the DEQ's proposed Solid Waste Permit for Grimm's Fuel Company Composting Facility (Grimm's Fuel). Metro shares the DEQ's interest in ensuring that facilities managing the region's waste and recyclable materials do so in ways that protect the environment and public health while minimizing nuisance impacts on the communities in which they are located.

Metro recommends that DEQ withhold its conditional inclusion of Type 3 feedstocks in Section 1.2 B in the proposed permit for Grimm's Fuel. Granting such premature approval of Type 3 feedstock would indicate that Grimm's Fuel has already submitted acceptable facility design plans and operating procedures to the DEQ (and Metro) that fully address management of these feedstocks. However, it is Metro's understanding that Grimm's Fuel has not developed nor submitted such plans to the DEQ (and have not submitted such plans to Metro). In addition, no local jurisdictions in Washington County are currently planning to implement a residential food waste and yard debris collection program in the near future.

At this time, Metro supports a permit renewal for Grimm's Fuel which does <u>not</u> include the Type 3 feedstocks, even if restricted to residentially generated food scraps mixed with yard debris. Rather, the DEQ should require the facility to apply for a future permit modification and provide the public with an opportunity to comment at that time. It is important that Grimm's Fuel develop and submit a satisfactory facility design and operating plan for managing any Type 3 feedstock when that type of feedstock is more likely to be available.

It is important for Metro and DEQ to be consistent in both timing and substance when issuing authorizations for facilities to manage new materials, especially feedstocks, such as food waste, that present additional operational and processing challenges.

Sincerely,

Scott Robinson
Deputy Chief Operating Officer
RB/SR:bjl
cc: Craig Dirksen, Metro Councilor
Kathryn Harrington, Metro Councilor
M:\rem\regaff\confidential\brower\Letters\DEQ Permit Comment Ltr November 2013rbsr.docx Queue

PENCE Holly

From: Cassie Cohen [cassiecohen@gmail.com]
Sent: Saturday, November 16, 2013 16:26
To: PENCE Holly
Cc: rodovale
Subject: Public Comments on

Public Comments from Cassie Cohen and Rodolfo Valentin:

- My partner and I believe the public should be informed and granted a public comment period if Grimm's Fuel makes the decision to accept Class A sewage sludge for composting at this facility.
- Furthermore, if the company goes ahead to seek a permit for non-Class A sewage sludge, DEQ must do much more robust public outreach to discuss the concern.
- Grimm's Fuel should be responsible for paying for monitoring of environmental risks, every 6 months, and provide DEQ and the Tualatin public with ongoing surface water testing, groundwater testing, odor and air quality testing.
- We insist that DEQ review its Environmental Justice (EJ) Plan and priorities for this particular case, and respond to me and Rodolfo about how you will address these priorities for this permitting case.

Thank you,

Cassie Cohen
503.816.4342

PENCE Holly

From: Gail T. [grandmagail@centurylink.net]
Sent: Friday, November 15, 2013 12:38
To: PENCE Holly
Cc: Ginnie ; Bev and John; Mel & Emi; Wendy White
Subject: Holly Pence

Opposition to Grimm Composting permit

Holly Pence
Solid Waste Permit Coordinator
DEQ Northwest Region
2020 SW 4th Ave, Suite 400
Portland, OR 97201

November 15, 2013

Subject: DEQ Draft Composting Permit, Grimms Fuel Company, Tualatin, OR

Dear Ms. Pence,

I am a property owner across hwy 99 from the Grimms Fuel Compost site. I would like to voice my opinion opposing the existing obnoxious activity currently in place and I oppose any additional disposal items such as dead animals and food based products that would obviously make the situation much worse.

Because of the terrible odor from Grimms Fuel and Compost site, there has been a significant devaluation of our commercial property that we are trying to sell. This has had a very negative affect from prospective medical, dental and office companies along with retail developers and users considering a location that is down-wind from the stinky recycling operation. It will only get worse if negative impacts of the draft DEQ Composting permit is granted.

Sincerely,

Gail Tornquist
195 Tornquist Road
McCleary, WA 98557

Member of "Gair Properties LLC"

PENCE Holly

From: John and Bev [johnandbev98584@gmail.com]
Sent: Friday, November 15, 2013 09:43
To: PENCE Holly
Subject: DEQ Draft Composting Permit, Grimm's Fuel Co. Tualatin, OR

Dear Ms.Pence,

Our business is located in the vicinity of Grimm's fuel in Tualatin I believe the recent DEQ proposed permit letting Grimm's to compost "Type 3 feedstock" should not go forward, we are bothered by the smell of noxious odors that comes from the Grimm 's fuel property some days are worse than others it would be even worse with the type 3 garbage . I don't believe it is in the best interest of for our workers and community for the DEQ to authorize this.

I'm supportive of recycling and a clean environment. But, Grimm's is located in a urban area uses of outdated open area composting method with no plan of odor control. I'm requesting that the DEQ withhold the authorization in its entirety.

Sincerely,
Beverly Jackson Lake
Gair Property LLC
johnand bev98585@gmail.com
phone 360-426-0676 Shelton
928-927-8313 arizone
mobile phone 360-463-1267
12bev62

PENCE Holly

From: OBRIEN Audrey
Sent: Monday, November 11, 2013 12:36
To: RAWSON Stephanie; BROWN Larry
Cc: PENCE Holly
Subject: FW: request regarding Updates from Cindy

fyi

From: OBRIEN Audrey
Sent: Monday, November 11, 2013 11:38 AM
To: 'lou@louogden.com'; 'slombos@ci.tualatin.or.us'
Cc: DECONCINI Nina
Subject: RE: request regarding Updates from Cindy

To: Lou Ogden and Sherilyn Lombos,

Currently Grimm's Fuel Company composting site is allowed to take types 1 (source-separated yard and garden wastes, wood wastes, agricultural crop residues, wax-coated cardboard, vegetative food wastes) and type 2 feedstocks (mostly manure and animal bedding). The draft permit conditionally allows the future acceptance of type 3 feedstocks. Type 3 feedstocks are defined to include dead animals, meat and source-separated mixed food waste and industrially produced non-vegetative food waste. The draft permit does not specify which type 3 feedstocks Grimm's is allowed to accept. The draft DEQ permit requires that prior to accepting any type 3 feedstocks, Grimm's must demonstrate compliance with the performance standards, and update the facility operations plan to address proper management of type 3 feedstocks for DEQ review and approval and obtain a Metro franchise.

DEQ's draft permit includes by reference Grimm's application and the City of Tualatin's land use approval. The conditional use permit allows only residential food waste and allows for a pilot of commercial food waste. Grimm's draft operations plan states:

> At this time GFC has no plans to accept and compost any type of Type 3 food waste; but, would like the ability to incorporate residential food waste in our composting activities in the future if we obtain a franchise agreement with Metro as part of an approved organics collection program....Prior to accepting Type III feedstocks, the facility will need to obtain a Metro franchise and explicit written permission from Metro. Should the facility begin processing these types of materials they will be accepted under the following provisions:.... Type III feedstocks will only be accepted from commercial haulers in conjunction with an approved curbside collection program where the type III feedstocks is mixed with Type I feedstocks (yard debris). It is estimated that less than 10% of these loads will be Type III materials.

At the public hearing on October 30, 2013, DEQ heard comments asking DEQ to not allow Grimm's to accept commercial food waste, to allow Grimm's to only accept residential food waste, and to not allow Grimm's to accept any Type 3 feedstock. DEQ also received many comments stating that odors should be addressed for the current compost operations prior to allowing any new feedstocks. At the close of the comment period which ends November 20, 2013 at 5 pm, DEQ will evaluate and determine what changes to make to the permit to be clearer on what Grimm's is authorized to accept and will also evaluate any changes to make to authorizations based on comments received.

Please let me know if you need any additional information or clarification.

Sincerely,

Audrey O'Brien
Manager, Environmental Partnerships Section
Oregon Department of Environmental Quality
Northwest Region-Portland Office
2020 SW Fourth Avenue, Suite 400
Portland, Oregon 97201
(503) 229-5072 office
(503) 209-9182 blackberry
(503) 229-6945 fax

From: DECONCINI Nina
Sent: Sunday, November 10, 2013 11:04 AM
To: 'lou@louogden.com'
Cc: 'slombos@ci.tualatin.or.us'; OBRIEN Audrey
Subject: Re: Updates from Cindy

Understood! We agree.

Nina

From: Louogden [mailto:lou@louogden.com]
Sent: Saturday, November 09, 2013 10:08 AM
To: DECONCINI Nina
Cc: slombos@ci.tualatin.or.us <slombos@ci.tualatin.or.us>; OBRIEN Audrey
Subject: Re: Updates from Cindy

Thx for the help on this. I just want to be certain if folks are broadcasting information that it is 100% accurate

Thanks,

Lou Ogden
Resource Strategies Planning Group
Group Benefits & Life, Health, Disability, & Long Term Care Insurance for
Businesses and Individuals
21040 SW 90th Ave. Tualatin, OR 97062
Phone 503.692.0163; Fax 503.385.0320
lou@louogden.com

On Nov 8, 2013, at 10:48 PM, DECONCINI Nina <DECONCINI.Nina@deq.state.or.us> wrote:

> Hi Lou,
>
> I have cc'd one of my managers to confirm.
>
> Audrey, can you reply to Lou and Cindy? Please see below.

Thanks!

Nina

From: Lou Ogden [mailto:lou@louogden.com]
Sent: Friday, November 08, 2013 08:49 PM
To: DECONCINI Nina
Cc: slombos@ci.tualatin.or.us <slombos@ci.tualatin.or.us>
Subject: FW: Updates from Cindy

Hello Nina,

Is this post from one of our CIO's accurate?
"The permit is continue current composting operations at the site and to increase the types of materials to include such things as dead animal carcasses, residential and commercial food waste, etc."

Thanks,

Lou Ogden
Resource Strategies Planning Group
Group Benefits & Life, Health, Disability, & Long Term Care Insurance for Businesses and Individuals
21040 SW 90th Ave. Tualatin, OR 97062
Phone 503.692.0163; Fax 503.385.0320
lou@louogden.com

From: Nextdoor CIO District 4 [mailto:nextdoor@nextdoor.com]
Sent: Friday, November 8, 2013 1:06 PM
To: lou@louogden.com
Subject: Updates from Cindy

<image001.png> Daily digest for CIO District 4

<image002.png> **Help CIO District 4 get to 150 members!**
119 members
Invite your neighbors

Recent activity from nearby neighborhoods <image003.png>

<image004.jpg> Cindy Phillips from Riverpark CIO1 on 02 Nov
Couldn't make DEQ meeting re: Grimm's composting permit? You can still submit comments.
DEQ has extended the comment period to 5 p.m. Weds. Nov. 20, 2013 for the proposed composting permit for Grimm's Fuel, operating at 18850 SW Cipole Rd. in

Background: On Sept. 30, 2013, DEQ opened a public comment period for the proposed composting permit for Grimm's Fuel. The comment period included a public hearing held Oct. 30 at the Juanita Pohl Center in Tualatin. The permit is continue current composting operations at the site and to increase the types of materials to include such things as dead animal carcasses, residential and commercial food waste, etc. For more info and instructions on how to submit comments, click here: http://www.deq.state.or.us/news/publicnotices/uploaded/131101_1639_201311011433-PNWeb-Pkg.pdf

<image005.png>Shared with Riverpark CIO1 and 12 nearby neighborhoods in General

View or reply · Thank · Private message

View all 3 replies

<image006.jpg> Cindy Phillips from Riverpark CIO1
at 8:37 PM

Tigard Times article on Grimm's permit application: http://www.pamplinmedia.com/ttt/89-news/200398-neighbors-wary-of-grimms-fuel-composting-plans

Thank

Not interested in messages from nearby neighborhoods? Turn them off.

Unsubscribe or change your e-mail settings.

This message was intended for lou@louogden.com.
Nextdoor, 101 Spear Street, Suite 230, San Francisco, CA 94105

<image007.gif>

PENCE Holly

From: Doug Slead [dtslead@hotmail.com]
Sent: Sunday, November 10, 2013 08:48
To: PENCE Holly
Subject: Grimms Fuel

As a landscape contractor, the location and the reasonable fees charged by Grimms for accepting the yard debris generated by my business, is extremely desirable! It is one of the positive items that helps me stay in business. I am sure others feel the same. The garden mulch generated by Grimms processing this yard debris, is a terrific product. I have used it many times for a variety of uses. I think that Grimms does a good job of running their site, and the yard is well organized. If they were forced to move, I'm sure they would lose many customers, some of which would find other more clandestine places to dump their debris. Grimms and their yard debris processing operation is a valuable asset to SW Portland and all of the area cities and communities.
Thank you for keeping Grimms in business.

Doug C Slead

PENCE Holly

From: ViAnn Austin [austinsinpdx@webtv.net]
Sent: Saturday, November 09, 2013 11:06
To: PENCE Holly
Subject: Grimms Fuel

We only live across highway 99W from Grimms and we have had to live with the noxious odors they produce. Too often we can't even enjoy our yard or patio because the offensive odors make us nauseous and gives us headaches. Our guests have been so offended by the odors that they wouldn't even get out of their cars to visit us! They said: "Let's meet somewhere else." Acceptance of food waste will only make it worse!! Please, please help by doing something to make our neighborhood more livable. Resolve these odor issues. Thank you for your consideration. Gene and ViAnn Austin,18304 SW 134 th Terr. Tualatin OR 97062.
Ron and Carol Mulder-Millspaugh, 18326 SW 134th Terr., Tualatin, OR 97062

PENCE Holly

From: Mel Jackson [meljack@gibralter.net]
Sent: Friday, November 08, 2013 09:29
To: PENCE Holly
Subject: DEQ Draft Composting Permit, Grimm's Fuel Co. Tualatin OR

Holly Pence
Solid Waste Permit Coordinator
DEQ Northwest Region
2020 SW 4th Ave, Suite 400
Portland, OR 97201

Dear Ms. Pence:

Gair Properties, LLC (GP, LLC) owns commercial property at US 99 and Cipole Road. This property is down wind from, and in very close proximity to, Grimm's Fuel Company in Tualatin. In agreement with other members of the Corporation and other affected persons/business entities, I voice strong opposition to allowing the recent DEQ proposed permit authorizing Grimm's to compost "Type 3 feed stocks" to go forward. The obnoxious "odor pollution" caused by Grimm's composting operations has significantly devalued our commercial property at this location. Prospective medical, dental, other office type companies, as well as, retail developers and other possible users considering use of this valuable location are quickly put off by the noxious odors from the current operations. Permitting even more odors to escape from Grimm's through composting of dead animals and food based products would significantly increase the negative impact, not only on GP, LLC's ability to put the property to its best and highest use, but to all the homes and businesses in the area.

In the best interests of those who would be most negatively affected, it is strongly recommended that DEQ withhold the permit authorization in its entirety.

Sincerely,
/s/
Melvin J. Jackson
Member
Gair Properties, LLC

PENCE Holly

From: Robert Pike [pikefamily123@gmail.com]
Sent: Thursday, November 07, 2013 20:27
To: PENCE Holly
Subject: Dead Animal Composting

If this is true then I am totally against it. This must only be done in very rural areas like maybe eastern Oregon. What can I do to stop this?

Bob Pike

PENCE Holly

From: Tiffanie Wheeler [tifwheel@comcast.net]
Sent: Thursday, November 07, 2013 10:18
To: PENCE Holly
Subject: Letter in support of Grimms Fuel permit
Attachments: Grimms permit.doc

November 5, 2013

Holly Pence
Solid Waste Permit Coordinator
DEQ Northwest Region
2020 SW 4th Ave. Suite 400
Portland, Or 97201

Dear Holly,

I am writing this letter in support of Grimm's Fuel and the current allegations concerning the odor. My husband and I live in Tigard directly across the Tualatin River from the Pony Ridge subdivision. We have lived in our home for the past 17 years and have never been concerned about an occasional odor from Grimm's.

In those 17 years, we have never heard of any concerns of the occasional odor from any of the many parents and friends that we associate with in this neighborhood. If there were environmental toxins produced by Grimm's, we believe problems would have evidenced themselves by now. Our daughter plays outside on a regular basis and is a normal, healthy, thriving 9 yr. old as well as all of her friends.

Grimm's provides jobs, quality landscape supplies and much needed recycling services to our community. They are avid supporters of youth athletics in the area.

Therefore, we would like it to go on record that we believe there is no basis for the current allegations against Grimm's Fuel and we support the renewal of their permit.

Sincerely,

Kevin and Tiffanie Wheeler
17100 S.W. 131st Ave.
Tigard, OR 97224
(503) 684-2505

PENCE Holly

From: Brad Parker [bparker@lazyboyportland.com]
Sent: Wednesday, November 06, 2013 15:48
To: PENCE Holly
Subject: Grimm's Fuel

My name is Brad Parker and I'm the owner and operator of La-Z-Boy Furniture Galleries in Tualatin Oregon with 7 locations around Oregon. I also live in North Tualatin and have for 18years. My business and neighborhood are both within a mile from Grimm's. I can't imagine living in the west side of Portland without Grimm's. I grew up going there on big yard work days and continue to make at least 5 trips a year to Grimms. I also bike by Grimms regularly as I am an avid cyclist. I have never felt that there is an odor problem with Grimms in all the years I have been a customer and a neighbor. Sure you can smell rotting plant materials, which is like manure smell, but it is only when you are right there. Grimms does a great job managing their site and they provide a very valuable service to this community. I am writing this letter to show my strong support for DEQ to continue to allow them to operate and provide a needed resource for recycling in the community. Please keep Grimms open we need them here.

Regards,

Brad

Brad Parker
President and CEO
La-Z-Boy Furniture Galleries
503-691-4440
bparker@lzbpdx.com

PENCE Holly

From: DEQ Online Subscriptions [ordeq@public.govdelivery.com]
Sent: Tuesday, November 05, 2013 14:17
To: PENCE Holly
Subject: DEQ News Release: DEQ extends comment period to Nov. 20 on proposed composting permit for Grimm's Fuel in Tualatin

DEQ has extended the comment period to 5 p.m. on Wednesday. Nov. 20, 2013 for the proposed permit for Grimm's Fuel composting site, operating at 18850 SW Cipole Rd. in Tualatin. For more information and instructions on how to comment, please visit DEQ's website.

For more information, please see the news release:

http://www.oregon.gov/deq/docs/110513grimmCommentNR.pdf

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This email was sent to pence.holly@deq.state.or.us using GovDelivery, on behalf of the Oregon Department of Environmental Quality (DEQ) · 811 SW 6th Avenue · Portland OR 97204 · 503-229-5696

State of Oregon Department of Environmental Quality

Oregon Department of Environmental Quality

News Release

Release Date: Nov. 5, 2013

Contact:
Stephanie Rawson, Solid Waste Program, Portland, 503-229-5562

DEQ extends comment period to Nov. 20 on proposed composting permit for Grimm's Fuel in Tualatin

DEQ has extended the comment period to 5 p.m. on Wednesday. Nov. 20, 2013 for the proposed permit for Grimm's Fuel composting site, operating at 18850 SW Cipole Rd. in Tualatin. For more information and instructions on how to comment, please visit DEQ's website.

On Sept. 30, 2013, DEQ opened a public comment period for the proposed composting permit for Grimm's Fuel. The comment period included a public hearing held Oct. 30 at the Juanita Pohl Center in Tualatin. Attendees requested an extension of the comment period beyond the original Nov. 6 deadline.

For more information about the facility and how to comment on the proposed permit, see the public notice.

DEQ is proposing to issue a new solid waste compost permit for Grimm's Fuel to reflect updated compost rule requirements. In reviewing Grimm's application, DEQ determined that Grimm's composting facility may pose a potential risk to surface waters and has the potential to generate offsite odors. The proposed permit includes requirements to control and minimize these risks.

The permit also requires Grimm's to operate according to a DEQ approved operations plan that identifies how the compost operation will meet performance standards, protect water quality and reduce odors.

###

PENCE Holly

From: FunTimeRVInc [funtimervnoinc@gmail.com]
Sent: Sunday, November 03, 2013 10:55
To: PENCE Holly
Subject: no on expanding to food waste in the future

ps...dont forget that we will be infested with flies , beyond our imagination , if food waste is allowed to be recycled in our city...should be located somewhere in the country...thank you.

PENCE Holly

From: dave cargni [davecargni@gmail.com]
Sent: Saturday, November 02, 2013 19:21
To: PENCE Holly
Cc: Toni Anderson Anderson
Subject: No composting station in Tualatin.

I have it from a very very reliable source (a garbage company owner), that we do not want a composting station within close proximity to our city as it will SMELL and it WILL attract unwanted animals (who in turn will breed, more unwanted animals).

How could this possible benefit Tualatin?..... we do not want to have a smelly city reputation. This could quite possibly lower our property values, and make Tualatin a less than desireable place for some to want to live in.

We have invested 22 years of our lives to this city, resently have spent $35,000 dollars in updates to our home and we do not want a composting station in or near Tualatin that will diminish our investment.

Respectfully,

Grace and Dave Cargni.

PENCE Holly

From: doc.meg.2009@gmail.com
Sent: Saturday, November 02, 2013 15:20
To: PENCE Holly
Subject: In favor of food composting at Grimms

After reading the proposed permit, I am in favor of the food compositing as long as Grimms follows the outlined conditions for protecting our water ways. I recognize that there will be some smells coming from the plant. I am accepting of that because we mist have more efficient ways of dealing with our waste. Thank you, Megan Boden Alvey, PsyD
Sent from my HTC One™ X+, an AT&T 4G LTE smartphone

PENCE Holly

From: Toni Anderson [tntand@gmail.com]
Sent: Saturday, November 02, 2013 09:40
To: PENCE Holly
Subject: Please do NOT allow dead animal & food waste composting in Tualatin

This poses a hazard to groundwater and surface water. Can jeopardize the health of domestic livestock, wildlife and pets in addition to the horrible smells that we already detect a mile away. It will only become much worse, devaluing the property we own in the area.

PENCE Holly

From: DEQ Online Subscriptions [ordeq@public.govdelivery.com]
Sent: Friday, November 01, 2013 10:41
To: PENCE Holly
Subject: DEQ extends comment period for Grimm's Fuel proposed composting permit

DEQ has extended the comment period to **5 p.m. Weds. Nov. 20, 2013** for the proposed composting permit for Grimm's Fuel, operating at 18850 SW Cipole Rd. in Tualatin. For more information and instructions on how to comment, please see this link.

Background: On Sept. 30, 2013, DEQ opened a public comment period for the proposed composting permit for Grimm's Fuel. The comment period included a public hearing held Oct. 30 at the Juanita Pohl Center in Tualatin. Attendees requested an extension of the comment period beyond the original Nov. 6.

This message was sent by Holly Pence, DEQ Northwest Region, pence.holly@deq.state.or.us or 503-229-5353.

View this and other public notices in all program areas at http://www.deq.state.or.us/news/publicnotices/pn.asp.

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This email was sent to pence.holly@deq.state.or.us using GovDelivery, on behalf of the Oregon Department of Environmental Quality (DEQ) · 811 SW 6th Avenue · Portland OR 97204 · 503-229-5696

State of Oregon Department of Environmental Quality

PENCE Holly

From: DEQ Online Subscriptions [ordeq@public.govdelivery.com]
Sent: Friday, November 01, 2013 10:40
To: STEVENS-SCHWENGER Joanie; DANAB Marcia; KNIGHT William; THOMPSON Michele; HOLMAN Fran; PENCE Holly; WHITE Brian; MAKICHEN Mary-Frances; SVELUND Greg; BROWN Trina
Subject: Courtesy Copy: DEQ extends comment period for Grimm's Fuel proposed composting permit

This is a courtesy copy of an email bulletin sent by Holly Pence.

This bulletin was sent to the following groups of people:

Subscribers of Solid Waste Permits (1890 recipients)

DEQ has extended the comment period to **5 p.m. Weds. Nov. 20, 2013** for the proposed composting permit for Grimm's Fuel, operating at 18850 SW Cipole Rd. in Tualatin. For more information and instructions on how to comment, please see this link.

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PENCE Holly

From: Jonathan Crane [jon@tualatinlife.com]
Sent: Thursday, October 31, 2013 16:37
To: OBRIEN Audrey
Cc: PENCE Holly
Subject: RE: Followup question from Grimm's hearing

Thank you, Audrey. I also asked if your agency relies solely on complaint based reports to know if one suspects lack of compliance, or will DEQ regularly monitor the facility, so I'm hoping that can be added to my questions.

Thank you,

Jonathan Crane

Tualatin Life

(503) 692-9215
jon@tualatinlife.com

From: OBRIEN Audrey [mailto:Obrien.Audrey@deq.state.or.us]
Sent: Thursday, October 31, 2013 10:25 AM
To: 'jon@tualatinlife.com'
Cc: PENCE Holly
Subject: RE: Followup question from Grimm's hearing

Jonathan,

Thank you for calling today to provide additional questions for DEQ to answer. You have asked about dust and how to know if a facility is out of compliance for dust? You also asked that DEQ explain how do we measure/monitor that? Against what standards?

DEQ will add these comments to those received last night at the public hearing and will respond to these together with other comments received when the comment period closes.

Sincerely,

Audrey O'Brien
Manager, Environmental Partnerships Section
Oregon Department of Environmental Quality
Northwest Region-Portland Office
2020 SW Fourth Avenue, Suite 400
Portland, Oregon 97201
(503) 229-5072 office
(503) 209-9182 blackberry
(503) 229-6945 fax

1A 33
Public Comment

RAWSON Stephanie

From: Ata Saedi [atasaedi@hotmail.com]
Sent: Thursday, October 31, 2013 4:54 PM
To: RAWSON Stephanie
Subject: Grimm's Proposed Permit

Hi Stephanie,
It was nice meeting you in person last night and thank you for arranging the hearing. I have one more comment to add and that is concerning the 25% volume of compost. I was suggesting the draft to be modified to start from say, 10%.
As I have pointed out in my testimony, I am totally opposed of permitting any type III feedstocks.

Regards, Ata(Ted) Saedi

Public Notice

Extension of public comment period—draft solid waste composting permit for Grimm's Fuel compost site

DEQ is extending the public comment period until November 20, 2013 and invites the public to comment on the proposed composting permit for Grimm's Fuel, a facility in Tualatin, OR.

Summary

At the public hearing held on October 30, 2013, DEQ received a request to extend the public comment period. DEQ has extended the comment period until November 20, 2013 at 5 pm.

DEQ issued the first solid waste compost permit to Grimm's in 1999. DEQ revised compost rules in 2009 and again in 2013 and proposes to issue a new permit to Grimm's that incorporates these rule requirements. In preparing the draft permit, DEQ has determined that Grimm's Fuel composting site can meet the rules and requirements to receive a permit from DEQ and DEQ proposes to issue the new compost permit for this composting site.

How do I participate?

You may submit written comments on the proposed permit. Send written comments by mail, fax or email to:

Holly Pence
Solid Waste Permit Coordinator
DEQ Northwest Region
2020 SW 4th Ave., Ste. 400
Portland OR 97201

Email: Pence.Holly@deq.state.or.us
Fax: 503-229-6957

Written comments due:
5 p.m., Wednesday, November 20, 2013

About the facility

DEQ has evaluated the planned composting operation and determined that it has the potential to pose risks to surface waters and has the potential to generate offsite odors. The proposed permit includes an updated operations plan that identifies how Grimm's plans to prevent environmental impacts and offsite odor impacts.

What types of waste would the permit regulate?

The draft permit does allow acceptance of food waste as a feedstock at some point in the future after DEQ receives an operations plan demonstrating that food waste can be accepted and managed to meet DEQ's requirements and after receiving approval and a franchise from Metro. The facility produces about 35,000 tons of compost per year. The draft permit does not include a physical expansion of the compost area.

How does DEQ determine permit requirements?

DEQ evaluates the potential waste produced, the type and amount of wastes involved, the location of the facility, and its methods of operation.

How does DEQ monitor compliance with the permit requirements?

DEQ must approve an operations plan that identifies how the compost operation will be designed, constructed and operated to meet performance standards and address potential risks of water quality and odor impacts. DEQ inspects full-permit composting facilities at regular intervals to verify compliance. The permit may also require the facility to perform analytical testing of water quality, and to investigate and resolve any odor issues to the maximum extent practicable.

Where can I get more information?

On-line: View the public notice, draft permit, and DEQ permit evaluation at
http://www.deq.state.or.us/news/publicnotices/PN.asp

In person: View the application and related documents at the DEQ Northwest Region office, 2020 SW 4th Ave. in Portland, OR. For a review appointment, contact Holly Pence:

Phone: 503-229-5353 or 1-800-452-4011 (toll free in Oregon)
Email: pence.holly@deq.state.or.us
Fax: 503-229-6957

Accessibility information

DEQ is committed to accommodating people with disabilities. Please notify DEQ of any special physical or language accommodations or if you need information in large print, Braille or another format.

To make these arrangements, contact DEQ Communications and Outreach in Portland at 503-229-5696 or call toll-free in Oregon at 800-452-4011; fax to 503-229-6762; or email deqinfo@deq.state.or.us.

People with hearing impairments may call 711.

State of Oregon
Department of Environmental Quality

Northwest Region
Land Quality Division
2020 SW 4th Ave Ste 400
Portland OR 97201

Phone: 503-229-5353
800-452-4011
Fax: 503-229-6957
Contact: Holly Pence
pence.holly@deq.state.or.us

www.oregon.gov/DEQ

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

DEQ provides documents electronically whenever possible in order to conserve resources and reduce costs.

If you received a hard copy of this notice, please consider receiving updates via e-mail instead. Send your request to: subscriptions@deq.state.or.us

Please include your full name and mailing address so that we can remove you from our print mailing list.

Last Updated: 10/31/2013
By: Holly Pence

PENCE Holly

From: Stephen Scott - Funtime RV [stephen@funtimervinc.com]
Sent: Wednesday, October 30, 2013 14:43
To: PENCE Holly
Subject: Grimm's Fuel hearing

To whom it may concern,

I'm sure that Grimm's is following any DEQ requirements thus far...although the business that they conduct is smelly. I have tolerated and tell any and all of our customers that complain about it that that's the way it is. Some days it can permeate so bad and the smell goes home with me in my nose.

If additional composting is allowed across the street I can imagine how much more smell there would be. That amount could be intolerable!
I appose any approval of composting at Grimm's Fuel

Thank you

Stephen Scott, Service Director
Funtime RV Inc.
18605 SW Pacific Dr.
Tualatin, OR. 97062
503-925-9620

PENCE Holly

From: Joel [joel@funtimervinc.com]
Sent: Wednesday, October 30, 2013 14:01
To: PENCE Holly
Subject: NO on COMPOSTING

hello...my name is joel mckaig...I work at funtime rv across the highway from grimms fuel...I worked at this location off and on, over the last 20 years...if you have ever been in the area then you already know that the smell is AWFUL...it smells like being next to the DUMP ! all of us knows what it smells like but its always very nasty for each new customer that arrives...the smell is between an unsafe toxic odor and one that gags you just before you feel like throwing up...most of our RV s arrive from the factory just 30 miles away with that kind of new rv smell or new car smell., but after a few times exposed to this odor the new rv s smell like used rv s in need of emptying the toilet tank...this a serious matter and I hope it wont get further out of hand...thank you so much...

Sincerely.
Joel McKaig
FunTimeRV
Toll Free 1-866-925-9620
www.funtimervinc.com
joel@funtimervinc.com

PENCE Holly

From: Rlhughs [rlhughs@gmail.com]
Sent: Wednesday, October 30, 2013 12:37
To: PENCE Holly
Subject: Grimm's Fuel Hearing

Dear Holly Pence,

I work across from Grimm's Fuel and wanted to let you know that we already have quite an odor as it is. I've had clients that thought we had Recreational Vehicles that had not been cleaned.
It will only get worse if they are allowed to bring in composting from Portland.
It also concerns me about the quality of our water.

In this economy we need advantages with out clients not disadvantages.

Please take our situation into consideration.

Sincerely,

Bob Hugh's

Funtime RV Inc.
Tualatin, Oregon 97062

Cell 951-236-5968
Toll Free 866-925-9620

Sent from my iPad

PENCE Holly

From: Rob Gamache [rgamache@orepac.com]
Sent: Wednesday, October 30, 2013 07:10
To: 'pence.holly@deq.state.or.us'
Subject: GRIMM'S Fuel Co.

Holly,

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

Thank you,

Rob Gamache

PENCE Holly

From: Tim Perri [timperri@gmail.com]
Sent: Tuesday, October 29, 2013 14:27
To: PENCE Holly
Subject: Composting Permit

Dear Holly, I just wanted to comment concerning Grimms Composting Company. We have been using Grimms for landscape supplies, yard debris recycling, and compost/mulch for many years. Grimms has done an excellent job as a "Green Recycling co." turning our leaves, grass and branches into a wonderful garden compost that is a real benefit to gardens and yard. Their prices are fair and the service they provide to the county and city are tremendous. They have been doing this longer than anyone else as far as i know and they are truly a fine family and community business providing a significant service to all. Thank you for considering my comments. Tim and Anne Perri 503-860-5150

PENCE Holly

From: Linda Moholt [linda@tualatinchamber.com]
Sent: Tuesday, October 29, 2013 09:10
To: PENCE Holly
Cc: Jeff Grimm
Subject: Grimm's Fuel
Attachments: 10-28-13 Grimms Letter of Support.pdf

Dear Holly,

Please see the attached letter of support for Grimm's Fuel. They are a valued member of our community and provide us with much needed recycling services. We are confident that they will comply with all DEQ regulations and continue to maintain the highest standards at their Tualatin facility. In addition, I will be attending the DEQ hearing on Wednesday night to provide further support. Thank you and kind regards,

Linda Moholt, CEO
Tualatin Chamber of Commerce
Office #503-692-0780
Cell #503-686-0878
www.tualatinchamber.com

Tualatin
CHAMBER OF COMMERCE
BUSINESS AND COMMUNITY WORKING TOGETHER

Tualatin
CHAMBER OF COMMERCE
BUSINESS AND COMMUNITY WORKING TOGETHER

October 28, 2013

Holly Pence
Solid Waste Permit Coordinator
DEQ Northwest Region
2020 SW 4th Ave. Suite 400
Portland, OR. 97201

Dear Holly,

The Tualatin Chamber of Commerce is submitting a letter of support for Grimm's Fuel with regard to the renewal of their current composting permit for type "1 and 2 feedstocks". Grimm's Fuel moved to Tualatin in 1975 and has been processing yard debris and other green waste since 1980. They have been a valued community member providing much needed composting services. Care is taken throughout all stages of their operation to ensure that the highest levels of environmental safety and DEQ standards are upheld to minimize the potential environmental risk. As performance standards and regulations have evolved over the years, Grimm's has continued to update their processes to stay abreast of those changes.

We are confident that Grimm's Fuel will maintain practices that will avoid harm to human health or the environment and that they will continue to comply with all DEQ regulations.

Thank you for allowing us to weigh in and support an important and valued business in our community. The services that Grimm's Fuel provides our region are needed and the 50 plus jobs they supply our families truly makes a difference in the Tualatin area.

Sincerely,

Linda Moholt

Linda Moholt, CEO, IOM
Linda@TualatinChamber.

PO Box 701
18791 SW Martinazzi Ave.
Tualatin, OR. 97062

Phone: 503-692-0780
Chamber@tualatinchamber.com
www.TualatinChamber.com

PENCE Holly

From: Robin and George Helm [helm@europa.com]
Sent: Tuesday, October 29, 2013 08:59
To: PENCE Holly
Subject: Permit for Grimm's Fuel Tualatin

I support the continued operation of Grimm's composting on Cipole Road. This facility has been located here for years and is a vital part of our region's recycling program. I have watched as new homes have encroached into the farm lands in this area and have wondered how they would deal with the odors from this site. The slight odor was there long before these homes were built and new residents were certainly aware of the smells they were buying into when they moved in. I would rather see these homes go away and farms restored than impose any more limits on Grimm's operation.

George Helm
11118 SW 51st Ave
Portland OR 97219

PENCE Holly

From: Bob & Mae Heide [rmheide@comcast.net]
Sent: Monday, October 28, 2013 23:17
To: PENCE Holly
Subject: Grimm's Fuel Company

Holly Pence,

We have been customers at Grimm's Fuel ever since we moved here in Tualatin four years ago. Upon the recommendation of our neighbors we came out to Grimm's to dispose of yard debris that first summer. We were so pleased with how easy it was to drop it off, and we were thrilled to find out that we could buy mulch to put around our bushes.

We had driven by on Highway 99W, and we didn't even know this company was there until we were told. We are satisfied customers.

Robert and Mae HEIDE
10375 SW Kiowa Street
Tualatin, OR 97062 503.486.5272

PENCE Holly

From: Charles Gorder and Carol Griest [gorder@comcast.net]
Sent: Sunday, October 27, 2013 11:30
To: PENCE Holly
Subject: Grimm"s Fuel Company

Ms. Pence:

We support the renewal of Grimm's Fuel Company's DEQ Composting permit. Grimm's provides a valuable service in collecting and processing excess yard debris in the Tigard-Tualatin-Sherwood area. We have been taking our excess yard debris to Grimm's for over 20 years. Don't know what we would do without them!

Thanks for your consideration.

Best regards,

Charles Gorder and Carol Griest
Tigard

PENCE Holly

From: Robert and Mary Todd [rmtodd@interserv.com]
Sent: Saturday, October 26, 2013 14:30
To: PENCE Holly
Subject: Grimms Fuel DEQ Composting Permit

We support Grimms and granting them the permit.

Thank you,

Robert and Mary Todd
Sherwood OR

PENCE Holly

From: Bill Carver [gardenguy@pacifier.com]
Sent: Friday, October 25, 2013 08:25
To: PENCE Holly
Subject: DEQ Composting Permit for Grimm's Fuel Company

Dear Ms. Pence. My name is Bill Carver and I have been a long-time customer of Grimm's Fuel Company at their Cipole Rd. location. I use it to recycle my garden debris and to purchase the recycled garden mulch and other soils.

I understand that Grimm's Fuel is looking to renew their Composting Permit and is seeking public comment to support their application. I am an OSU Master Gardener and believe they provide a very valuable resource to both commercial landscaping companies and home gardening enthusiates, such as myself. What else would we be doing with our organic garden debris if we have no place to properly dispose of it. They take our garden material and make it into a useful product to be reused in our gardens and landscaping. Besides, their company provides employement to a number of fellow citizens.

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

Thank you.

Bill Carver
10155 SW Hoodview Dr.
Tigard, OR. 97224

McFarlane's Bark, Inc.
13345 S.E. Johnson Road
Milwaukie, OR 97222
503-659-4240

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DEPT OF ENVIRONMENTAL QUALITY
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October 23rd, 2013

Holly Pence
Solid Waste Permit Coordinator
DEQ Northwest Region
2020 SW 4th Avenue, Suite 400
Portland, OR 97201

Dear Ms. Pence,

We are all aware of the cost savings to businesses, residents and municipalities when our recycling facilities are within our neighborhood's reach. In addition, our recycling programs work so well, that many Processors have an abundance of incoming feedstock and manufactured product, thus we will be prepared for the projected market increases.

It is important to notice that Grimm's Fuel has been a successful recycling company; a major player in bringing to fruition and maintaining the environmentally sustainable and natural resource recovery programs that Grimm's has participated in since the mid 1980's. Their part in being one of the bedrock foundations of these programs continues to provide the ability of sustaining management of a huge metropolis' green waste. Thus, Grimm's has proven, over and over, their continued ability to maintain their integral and heavy responsibilities as a Processing member of this state. The "icing on this cake" is being a part of a great example for showing that the State of Oregon takes responsibility for our own waste with the use of these proven engineered operations.

McFarlane's Bark, Inc. is a proponent for the reinstatement of the Grimm's Fuel Company DEQ permit.

Sustainably,

Kathleen McFarlane

Kathleen McFarlane
Co Owner and Public Relations Manager
McFarlane's Bark, Inc.
503-659-4240
kmcfarlane@mcfarlanesbark.com

PENCE Holly

From: steve@greenleafportland.com
Sent: Thursday, October 24, 2013 09:05
To: PENCE Holly
Subject: Grimm's Fuel

Holly,

Please update Grimm's DEQ composting permit as they perform an extremely valuable service to our community. Our company uses Grimm's often and we would hate to not have them available to us in the future.

Thanks.

Steve Patarozzi
Owner/Partner
Green Leaf Irrigation & Landscape

PENCE Holly

From: Ann Lawson [alawson@russellconstruction.com]
Sent: Wednesday, October 23, 2013 11:57
To: PENCE Holly
Cc: Norman Russell
Subject: Letter of Support for Grimm's Fuel Company
Attachments: Grimm Fuel Recommendation Letter.pdf

Good Afternoon, Holly,

Attached is a letter of support for Grimm's Oregon DEQ Composting Permit update. We have been loyal customers for over 30 years. We are fully in support of renewing their composting permit.

Thank you,

Ann Lawson
Project Manager Assistant

Russell Construction
"Building a Tradition of Quality"
20915 SW 105th Ave
Tualatin, OR 97062-9511
(503) 692-9002 ph
(503) 692-9008 f
www.russellconstruction.com

RUSSELL CONSTRUCTION INC

"Building a Tradition of Quality"

October 22, 2013

Holly Pence
Solid Waste Permit Coordinator
DEQ Northwest Region
2020 SW 4th Ave., Suite 400
Portland, OR 97201

Dear Holly Pence,

Russell Construction has been a loyal customer of Grimm's Fuel Company for over 30 years. We use their services for recycling, composting and lumber debris disposal. They are locally owned and conveniently located. It would be a hardship to transport our compost and wood waste to a different location. We hope you seriously consider renewing their Oregon DEQ Composting Permit.

Sincerely,

Norman Russell
President

20915 SW 105th Avenue / Tualatin, Oregon 97062-9511 / Office 503.692.9002
Fax 503.692.9008 / www.RussellConstruction.com / ccb#58918

PENCE Holly

From: ryanoc5@gmail.com on behalf of Ryan Sale [ryans@starkstreet.com]
Sent: Tuesday, October 22, 2013 12:58
To: PENCE Holly
Subject: Grimms Fuel Co

I am writing to support a fellow local small business in their composting permit application process. Grimms Fuel Company is a great business that provides a needed service for the local community and I support their efforts.

--
Ryan Sale
Stark Street Lawn and Garden
www.starkstreet.com

PENCE Holly

From: Joe Shroyer [jshroyer@mitchellewis.com]
Sent: Tuesday, October 22, 2013 10:05
To: PENCE Holly
Subject: Grimms Fuel-Sherwood, Oregon

Ms Spence,
Good morning.
I am responding to a request by my local Grimm's Fuel Company, to drop you line, to encourage your approval of their compost permit renewal.

They are great to have locally, because of all the yard work and leaves that the Sherwood area enjoys.
They seem to run a popular, clean, safe and well coordinated operation.
They are in an industrial area of the county, so they pose no problem to neighborhoods or other retailers.

I am glad to have them so close to my residence to take advantage of their yard debris drop off, along with their bark dust, soil and gravel products.

Regards,
Joe Shroyer

Joe Shroyer
Territory Manager
Mitchell Lewis & Staver
9925 S.W. Commerce Circle
Wilsonville, OR 97070
Off-- 503-682-1800
Fax-- 503-682-0529
Cell-- 503-329-7707

PENCE Holly

From: eastmanlandscape [eastmanlandscape@comcast.net]
Sent: Monday, October 21, 2013 14:27
To: PENCE Holly
Subject: Grimm's fuel

Eastman Landscape, Inc.
Po Box 2248
Lake Oswego, Or 97035
503.636.4888

Grimm's yard debris and recycling is an important service for the community and in my opinion should remain.

Sincerely,

John Eastman
Eastman Landscape, Inc.

PENCE Holly

From: Tim Pearson [tpearson@jameskingco.com]
Sent: Monday, October 21, 2013 09:45
To: PENCE Holly
Subject: Grimm's Fuel Co.

From: Tim Pearson
Date: October 21, 2013
To: Holly Pence, Solid Waste Permit Coordinator
Subject: Grimm's Fuel Co.

Ms. Pence

As a local business owner of James King & Co, Inc. at 19939 SW Cipole Rd. in Sherwood, I am writing you in support of Grimm's Fuel Co. Recycling operation that is located just up the road from us on Cipole Rd. We believe it is a positive thing to have a recycling operation in our community. They provide a valuable service, jobs and add a value to the sustainable living in our community.

We have been neighbors since 1998 and have not found their operation to be offensive in any way.

Thank you for your consideration.

Tim Pearson
President
James king & Co., Inc
503-924-0408

PENCE Holly

From: kilosteve [kilosteve@gmail.com]
Sent: Thursday, October 17, 2013 18:36
To: PENCE Holly
Subject: Grimm's Fuel composting permit

I saw that their permit was up for renewal and wanted to express my hope that they stay in your good graces. I've been taking my landscape debri there for over 20 years. Seems like an efficient operation. It's really handy having a recycle operation close by. I recycle everything that I can find a spot for.
Steve Farrar 503-314-9243 . P.o. Box 3481, Tualatin

Sent from my Verizon Wireless 4G LTE Smartphone

PENCE Holly

From: Chad Bentley [cbentley@hardwoodind.com]
Sent: Thursday, October 17, 2013 14:02
To: PENCE Holly
Subject: Grimm's Fuel Company Composting Permit

Holly,
We here at Hardwood Industries support the renewal of Grimm's Fuel Company's composting Permit. They provide us with a reasonably priced and local facility to recycle our wood and yard debris.

Thanks

Hardwood Industries Inc.
Operations Manager
Chad Bentley
20548 Sw Wildrose Place
Sherwood Or 97140
503-692-6620 ext 1126
503-849-5204 Cell
503-884-7706 Fax
cbentley@hardwoodind.com