

**Comment #1**

**From:** Cisco Unity Connection Messaging System  
**To:** [MRC Public Comment Line](#)  
**Subject:** Message from [REDACTED]  
**Date:** Thursday, November 16, 2023 2:04:04 PM  
**Attachments:** [VoiceMessage.wav](#)

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Audio file  
20231116 VoiceMessage from [REDACTED]).wav

Received November 16, 2023, 2:02 pm

**Transcript**

Yes, I'm my name is [REDACTED]  
[REDACTED] And I'm calling on the Grimm fuel solid waste renewal application. I am in favor of reducing the oxygen check to weekly. I think they've really cleaned up their act and but I think they should keep the blower piece to maximize the speed with which the material goes through the system. Again, my name is [REDACTED] and I'm calling on Grimm's application, and I'm calling in the public comment period. Thank you.

## Comment #2

**From:** Wufoo  
**To:** [SWICC](#)  
**Subject:** [External sender]Comment on Grimm's Fuel Company, Inc. [#3]  
**Date:** Thursday, November 16, 2023 4:03:41 PM

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**CAUTION:** This email originated from an **External source**. Do not open links or attachments unless you know the content is safe.

Email *	[REDACTED]
Name	[REDACTED]
	Hillsboro
Zip code *	97123
What would you like to share with Metro about the Grimm's Fuel Company, Inc. solid waste facility license application? *	Grimm's is a important, one of a kind operation in our area that provides the vital service of receiving, processing, composting and selling back to the public, biological matter ready for use a fertilizer or mulch. Without Grimm's, tons of biowaste would have to be trucked to over-subscribed sanitary landfills. Please keep Grimms open.

### Comment #3

**From:** Wufoo  
**To:** [SWICC](#)  
**Subject:** [External sender]Comment on Grimm's Fuel Company, Inc. [#4]  
**Date:** Friday, November 17, 2023 2:44:30 PM

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**CAUTION:** This email originated from an **External source**. Do not open links or attachments unless you know the content is safe.

Email *	[REDACTED]
Name	[REDACTED]
Address	[REDACTED] SW 133rd Terrace
	Tualatin
	Oregon
Zip code *	97062

What would you like to share with Metro about the Grimm's Fuel Company, Inc. solid waste facility license application? \*

Grimm's wants to eliminate the requirement for 12" of bio cover to allow for more composting volume. What will this do for continuing to reduce the odors and dangers of compost fires? The way Grimm's currently runs it's compost program has lowered the complaints down 98%. This is great and neighbors appreciate it. Please don't go back to mass piles with odors contaminating the surrounding neighborhoods. Complaints will rise, and possible fires may occur. Thank you all for working with your neighbors. We all use Grimm's and support their services, but we also have to live in the neighborhood. Let's respect each other's rights.

## Comment #4

**From:** Wufoo  
**To:** [SWICC](#)  
**Subject:** [External sender]Comment on Grimm's Fuel Company, Inc. [#5]  
**Date:** Sunday, November 19, 2023 7:50:17 PM

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**CAUTION:** This email originated from an **External source**. Do not open links or attachments unless you know the content is safe.

Email *	[REDACTED]
Name	[REDACTED]
Address	[REDACTED] SW 133rd Terrace Tualatin OR 97062
Zip code *	97062
What would you like to share with Metro about the Grimm's Fuel Company, Inc. solid waste facility license application? *	The upgrades at Grimm's have made a WORLD of difference!!! The odor is gone, the dust is gone, and the headaches are gone! The Grimm family has also done a terrific job keeping the community up to date and treats us very well when we come over to use the facility. The family has gone over and above to be a good neighbor. If they feel they can make these changes in good faith, then our family supports them.

**Comment #5**

**From:** Wufoo  
**To:** [SWICC](#)  
**Subject:** [External sender]Comment on Grimm's Fuel Company, Inc. [#6]  
**Date:** Thursday, November 30, 2023 12:41:31 PM

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Email *	[REDACTED]
Name	[REDACTED]
Address	[REDACTED] SW 133rd TER Tualatin OR 97062
Zip code *	97062
What would you like to share with Metro about the Grimm's Fuel Company, Inc. solid waste facility license application? *	We live across 99W from Grimm's. Only problem we have with them is the noise of large metal plates (or metal containers) being moved around at 6am. Altho it may be coming from the RV sales company across 99W from them. Odors have been very minimal, and could be coming from a lot of areas around here. Let them continue business. They are a benefit to our community.

## Comment #6

**From:** Wufoo  
**To:** [SWICC](#)  
**Subject:** [External sender]Comment on Grimm's Fuel Company, Inc. [#7]  
**Date:** Thursday, November 30, 2023 1:42:36 PM

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Email *	[REDACTED]
Name	[REDACTED]
Address	[REDACTED] SW Wapato St
	Sherwood
	OR
Zip code *	97140
What would you like to share with Metro about the Grimm's Fuel Company, Inc. solid waste facility license application? *	I moved here from out of state in 2018 and that smell was horrible. I could not believe it was allowed to smell that way. If you drove by the facility with your windows down the smell would not leave your car for days and made me psychically sick. I was so worried about where I moved to. I was happy that the regulation was put into place. It has made a major difference in allowing us to enjoy clean smelling air. A big reason why we stayed in Oregon over our previous state.

## Comment #7

**From:** Wufoo  
**To:** [SWICC](#)  
**Subject:** [External sender]Comment on Grimm's Fuel Company, Inc. [#8]  
**Date:** Thursday, November 30, 2023 2:21:52 PM

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**CAUTION:** This email originated from an **External source**. Do not open links or attachments unless you know the content is safe.

Email \* [REDACTED]

Name [REDACTED]

Address [REDACTED] SW Rickard Pl

Sherwood

Oregon

Zip code \* 97140-8221

What would you like to share with Metro about the Grimm's Fuel Company, Inc. solid waste facility license application? \*

I am very concerned that Grimm's is asking to change the license agreement for the business to undo the progress made about 5 yrs. ago!

The level of particulates and nasty, overwhelming odors has been much improved as the business now is run. Why change the process that is working?

The health of our communities, property value decrease as well as the livability of the entire area would be threatened if Grimm's is granted a changed license.

Thanks for taking this issue seriously and recognizing the impact on our communities.

**Comment #8**

**From:** Wufoo  
**To:** [SWICC](#)  
**Subject:** [External sender]Comment on Grimm's Fuel Company, Inc. [#9]  
**Date:** Thursday, November 30, 2023 10:50:58 PM

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**CAUTION:** This email originated from an **External source**. Do not open links or attachments unless you know the content is safe.

Email *	[REDACTED]
Name	[REDACTED]
Address	[REDACTED] SW ELDORADO DR TIGARD OR
Zip code *	97224-2080
What would you like to share with Metro about the Grimm's Fuel Company, Inc. solid waste facility license application? *	The system is working great as is. Why change it? We suffered for a long time with air that stunk and burned your eyes and infiltrated our homes. We had to fight hard to get Grimms to fix it. If Grimms gets a 5 year contract to operate at their proposed levels and it doesn't work, they will not correct it voluntarily, Maybe a trial period for 6 months? The odor did vary, depending on weather and season.



## Comment #9

**From:** Wufoo  
**To:** [SWICC](#)  
**Subject:** [External sender]Comment on Grimm's Fuel Company, Inc. [#10]  
**Date:** Saturday, December 2, 2023 10:23:27 AM

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**CAUTION:** This email originated from an **External source**. Do not open links or attachments unless you know the content is safe.

Email *	[REDACTED]
Name	[REDACTED]
Address	[REDACTED] SW 135th Terrace
	Tualatin
	OR
Zip code *	97062

What would you like to share with Metro about the Grimm's Fuel Company, Inc. solid waste facility license application? \*

I live close to Grimms. I am not in favor of the two proposed changes in their operations they would like to make for 2024. Ever since the change in 2020 the air quality has been so much better . Our health related issues because of unacceptable air quality diminished. {lease do not change these two operations:Reduce the frequency of oxygen monitoring from daily to weekly.  
Reduce the requirement for the use of a bio-cover from 12 inches to as needed to minimize odors.  
Respectfully [REDACTED]

**Comment #10**

**From:** Wufoo  
**To:** [SWICC](#)  
**Subject:** [External sender]Comment on Grimm's Fuel Company, Inc. [#11]  
**Date:** Sunday, December 3, 2023 2:45:10 PM

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**CAUTION:** This email originated from an **External source**. Do not open links or attachments unless you know the content is safe.

Email *	[REDACTED]
Name	[REDACTED]
Address	[REDACTED] SW 135th Terrace
	Tualatin
	OR
Zip code *	97062
What would you like to share with Metro about the Grimm's Fuel Company, Inc. solid waste facility license application? *	As a 12 year resident of Pony Ridge I do NOT approve of proposed changes by Grimms regarding Oxygen monitoring and the bio cover

## Comment #11

**From:** Cisco Unity Connection Messaging System  
**To:** [MRC Public Comment Line](#)  
**Subject:** Message from [REDACTED]  
**Date:** Tuesday, December 5, 2023 2:41:27 PM  
**Attachments:** [VoiceMessage.wav](#)

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Audio file

20231205 VoiceMessage from B [REDACTED]).wav

Received December 5, 2023, 2:41 pm

### Transcript

Hello, my name is [REDACTED] and I live across the street across Hwy. 99 from Grimm's Waste Management. I understand that they are trying to change trying to lower the standards of odor mitigation and I am calling to request that that change not be made. It finally doesn't stink in this neighborhood. And I hope that the odor problems can be minimized. I would like to request that there be no change to the existing odor mitigation procedures.

**Comment #12**

**From:** Wufoo  
**To:** [SWICC](#)  
**Subject:** [External sender]Comment on Grimm's Fuel Company, Inc. [#12]  
**Date:** Saturday, December 9, 2023 4:54:44 PM

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Email *	[REDACTED]
Name	[REDACTED]
Address	[REDACTED] SW Cole Court
	Tualatin
	Oregon
Zip code *	97062
What would you like to share with Metro about the Grimm's Fuel Company, Inc. solid waste facility license application? *	Several years ago, I noticed a distinct odor and that was caustic and I was very concerned. Evidently, I was not allowed! This past year, I have not noticed as much it but I am very concerned that these reductions will potentially cause health issues to adjacent neighbors. Reducing the testing is a mistake as is the reduction of the bio cover.

### Comment #13

**From:** Wufoo  
**To:** [SWICC](#)  
**Subject:** [External sender]Comment on Grimm's Fuel Company, Inc. [#13]  
**Date:** Saturday, December 9, 2023 6:41:05 PM

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**CAUTION:** This email originated from an **External source**. Do not open links or attachments unless you know the content is safe.

Email *	[REDACTED]
Name	[REDACTED]
Address	[REDACTED] sw 107th ave Tualatin
	Or
Zip code *	97062
What would you like to share with Metro about the Grimm's Fuel Company, Inc. solid waste facility license application? *	I believe this permit should be approved. This business has been a good neighbor and business in the community for a long time. They have made changes to operations through out the years to meet requirement. They are a great source for yard debris disposal and mulch in return.  Please approve.

**Comment #14**

**From:** Wufoo  
**To:** [SWICC](#)  
**Subject:** [External sender]Comment on Grimm's Fuel Company, Inc. [#14]  
**Date:** Saturday, December 9, 2023 6:46:17 PM

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Email *	[REDACTED]
Name	[REDACTED]
Address	[REDACTED] Sw Carriage Oaks Ln
	Wilsonville
	OR
Zip code *	97070
What would you like to share with Metro about the Grimm's Fuel Company, Inc. solid waste facility license application? *	Grims is a great place to recycle debris city even ahold by to dump debris

**Comment #15**

**From:** Wufoo  
**To:** [SWICC](#)  
**Subject:** [External sender]Comment on Grimm’s Fuel Company, Inc. [#15]  
**Date:** Saturday, December 9, 2023 7:08:11 PM

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**CAUTION:** This email originated from an **External source**. Do not open links or attachments unless you know the content is safe.

Email *	[REDACTED]
Name	[REDACTED]
Address	[REDACTED] SW 111th Ave Tualatin OR 97062

What would you like to share with Metro about the Grimm's Fuel Company, Inc. solid waste facility license application? \*

Dear Metro:

It’s important to not lose sight of the fact that the business Grimm’s Fuel Co. is a neighbor too, pays property taxes and payroll etc. so we need to remain reasonable and respectful when making requests for them to change/make improvements.

Thank you for the changes you’ve helped get implemented so far. The horrible smell is much improved this past year compared to what it had been previously. It would be great if there was a scientific way to detect, record and report the impact on air quality that the piles at Grimms emits. Thanks again for all you do!

We are impacted by odors from the composting operation at Grimm’s Fuel and we insist that Metro maintain the existing requirement of 12–inches of bio–cover on all sides of the compost piles. The license requirement is reasonable, feasible, and necessary for the following reasons:

- Short distance between the compost piles and nearby residential areas
- The large radius of current odor impacts
- An expected increase in Grimm’s future composting volume
- The bio–cover is currently working and it is effective
- Green Mountain Technologies recommended a minimum of 12–inches of bio–cover

Current odor impacts exceed one mile in distance, which is more than 4 times Metro’s standard quarter–mile radius for mailing public notice postcards. The bio–cover is currently reducing the frequency, severity, and duration of odor impacts on the surrounding community. We are not interested in going backwards or enduring any increase in odor.

Jeff Grim, the owner of Grimm's Fuel, stated at the Metro info session on December 5th, that they are only using about 50% of total system capacity in February. That means that even with the current regulations in place, February odor impacts could double.

Reducing the oxygen monitoring requirement from daily to weekly is reasonable, as long as the new license includes a provision that if the oxygen level dips below normal, monitoring should go back to daily until the cause of the dip is isolated and resolved.

The current complaint-driven operational model is flawed, due to a number of factors, including the technical difficulties with an odor reporting form that does not always work, combined with the disclaimers, technical hurdles, and warnings that Metro staff has added to this form, each of which would result in a decrease in the number of complaints submitted.

Rather than using odor complaints to monitor air quality, a more scientific approach is needed. We are asking Metro to install automated air quality monitoring equipment at the fence line and hire an independent air quality consultant to perform an air quality and odor survey over a period of at least 12 months to take into account all atmospheric conditions. We have a right to know what is in the air that we are breathing. The health impacts of living downwind from this facility have never been studied, and it is time to address this issue.

Metro has an obligation to protect the public from both current and future impacts. The bio-cover is necessary, it is currently working, and its removal would be negligent and unjustified.

Thank you for your consideration.

<https://www.oregonmetro.gov/news/public-notice-opportunity-comment-grimm-s-fuel-company-inc-solid-waste-facility-license-renewal>



## Comment #16

**From:** Wufoo  
**To:** [SWICC](#)  
**Subject:** [External sender]Comment on Grimm's Fuel Company, Inc. [#16]  
**Date:** Sunday, December 10, 2023 8:40:37 AM

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**CAUTION:** This email originated from an **External source**. Do not open links or attachments unless you know the content is safe.

Email *	[REDACTED]
Name	[REDACTED]
Address	[REDACTED] sw 70th ave Tualatin OR 97062

What would you like to share with Metro about the Grimm's Fuel Company, Inc. solid waste facility license application? \*

We are impacted by odors from the composting operation at Grimm's Fuel and we insist that Metro maintain the existing requirement of 12-inches of bio-cover on all sides of the compost piles. The license requirement is reasonable, feasible, and necessary for the following reasons:

- Short distance between the compost piles and nearby residential areas
- The large radius of current odor impacts
- An expected increase in Grimm's future composting volume
- The bio-cover is currently working and it is effective
- Green Mountain Technologies recommended a minimum of 12-inches of bio-cover

Current odor impacts exceed one mile in distance, which is more than 4 times Metro's standard quarter-mile radius for mailing public notice postcards. The bio-cover is currently reducing the frequency, severity, and duration of odor impacts on the surrounding community. We are not interested in going backwards or enduring any increase in odor.

Jeff Grim, the owner of Grimm's Fuel, stated at the Metro info session on December 5th, that they are only using about 50% of total system capacity in February. That means that even with the current regulations in place, February odor impacts could double.

Reducing the oxygen monitoring requirement from daily to weekly is reasonable, as long as the new license includes a provision that if the oxygen level dips below normal, monitoring should go back to daily until the cause of the dip is isolated and resolved.

The current complaint-driven operational model is flawed, due to a number of factors, including the technical difficulties with an odor reporting form that does not always work, combined with the disclaimers, technical hurdles, and warnings that Metro staff has added to this form, each of which

would result in a decrease in the number of complaints submitted.

Rather than using odor complaints to monitor air quality, a more scientific approach is needed. We are asking Metro to install automated air quality monitoring equipment at the fence line and hire an independent air quality consultant to perform an air quality and odor survey over a period of at least 12 months to take into account all atmospheric conditions. We have a right to know what is in the air that we are breathing. The health impacts of living downwind from this facility have never been studied, and it is time to address this issue.

Metro has an obligation to protect the public from both current and future impacts. The bio-cover is necessary, it is currently working, and its removal would be negligent and unjustified.

## Comment #17

**From:** Wufoo  
**To:** [SWICC](#)  
**Subject:** [External sender]Comment on Grimm's Fuel Company, Inc. [#17]  
**Date:** Sunday, December 10, 2023 8:50:42 AM

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**CAUTION:** This email originated from an **External source**. Do not open links or attachments unless you know the content is safe.

Email *	[REDACTED]
Name	[REDACTED]
Address	[REDACTED] SW 133RD TER TUALATIN
	State
Zip code *	97062-7332
What would you like to share with Metro about the Grimm's Fuel Company, Inc. solid waste facility license application? *	Do not allow the proposed changes. I live in the Pony Ridge development across highway 99 the odor is prevalent at times even after the last required revamp

**Comment #18**

**From:** Wufoo  
**To:** [SWICC](#)  
**Subject:** [External sender]Comment on Grimm’s Fuel Company, Inc. [#18]  
**Date:** Sunday, December 10, 2023 9:17:20 AM

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**CAUTION:** This email originated from an **External source**. Do not open links or attachments unless you know the content is safe.

Email *	[REDACTED]
Name	[REDACTED]
Address	[REDACTED] SW ELDORADO DR
	TIGARD
	OR
Zip code *	97224-2080

What would you like to share with Metro about the Grimm's Fuel Company, Inc. solid waste facility license application? \*

pacted by odors from the composting operation at Grimm’s Fuel and we insist that Metro maintain the existing requirement of 12-inches of bio-cover on all sides of the compost piles. The license requirement is reasonable, feasible, and necessary for the following reasons:

- Short distance between the compost piles and nearby residential areas
- The large radius of current odor impacts
- An expected increase in Grimm’s future composting volume
- The bio-cover is currently working and it is effective
- Green Mountain Technologies recommended a minimum of 12-inches of bio-cover

Current odor impacts exceed one mile in distance, which is more than 4 times Metro’s standard quarter-mile radius for mailing public notice postcards. The bio-cover is currently reducing the frequency, severity, and duration of odor impacts on the surrounding community. We are not interested in going backwards or enduring any increase in odor.

Jeff Grim, the owner of Grimm’s Fuel, stated at the Metro info session on December 5th, that they are only using about 50% of total system capacity in February. That means that even with the current regulations in place, February odor impacts could double.

Reducing the oxygen monitoring requirement from daily to weekly is reasonable, as long as the new license includes a provision that if the oxygen level dips below normal, monitoring should go back to daily until the cause of the dip is isolated and resolved.

The current complaint-driven operational model is flawed, due to a number of factors, including the technical difficulties with an odor reporting form that does not always work, combined with the disclaimers, technical hurdles, and warnings that Metro staff has added to this form, each of which

would result in a decrease in the number of complaints submitted.

Rather than using odor complaints to monitor air quality, a more scientific approach is needed. We are asking Metro to install automated air quality monitoring equipment at the fence line and hire an independent air quality consultant to perform an air quality and odor survey over a period of at least 12 months to take into account all atmospheric conditions. We have a right to know what is in the air that we are breathing. The health impacts of living downwind from this facility have never been studied, and it is time to address this issue.

Metro has an obligation to protect the public from both current and future impacts. The bio-cover is necessary, it is currently working, and its removal would be negligent and unjustified.

Thank you for your consideration.

**Comment #19**

**From:** Wufoo  
**To:** [SWICC](#)  
**Subject:** [External sender]Comment on Grimm's Fuel Company, Inc. [#19]  
**Date:** Sunday, December 10, 2023 3:03:17 PM

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**CAUTION:** This email originated from an **External source**. Do not open links or attachments unless you know the content is safe.

Email *	[REDACTED]
Name	[REDACTED]
Zip code *	97062
What would you like to share with Metro about the Grimm's Fuel Company, Inc. solid waste facility license application? *	I've lived in tualatin for over 20 years and Grimms has been a great business. As more houses are built they are encroaching on businesses such as Grimms and Tricounty gun club. People know the businesses are there when they buy their house. I support local businesses. Please do not impact the business because of whiny people who knew what they were getting into.

## Comment #20

**From:** Wufoo  
**To:** [SWICC](#)  
**Subject:** [External sender]Comment on Grimm's Fuel Company, Inc. [#20]  
**Date:** Sunday, December 10, 2023 9:55:01 PM

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Email *	[REDACTED]
Name	[REDACTED]
Address	[REDACTED] SW 133rd Terrace
	Tualatin
	OR
Zip code *	97062

What would you like to share with Metro about the Grimm's Fuel Company, Inc. solid waste facility license application? \*

Hello Joanna and Chris,

Thank you for hosting the Webinar and Q and A this past week. I will also be submitting my comments on your on-line form but after discussions during the webinar about technical difficulties; I decided to cover all my bases. As I mentioned in my comments that evening, your 1/4 mile radius metric for mailing information to people who are directly impacted by the odors and dust particles from Grimm's is wholly inadequate. Every resident in the Pony Ridge and Angel Haven neighborhoods needs to be notified. That includes Pacific Drive, 133rd Terrace, 134th Terrace, 135th Terrace and Ute Streets. To not notify these key places that are impacted regularly is negligent in my opinion. There is some serious history with this situation and unless you have read every past comment from five plus years ago or smelled the stench day in and day out, you can't begin to understand.

Had it not been for the people who were aware of Grimm's license renewal notifying us, this whole process would have been completed under the radar; which is totally unacceptable. Removing the 12 inch bio-cover is also unacceptable. That requirement needs to remain in place. The twelve inch bio-cover is working to mitigate a good portion of the odor. Even with the bio-cover, there are still days when it is bad. Makes one wonder if the current bio-cover requirement is being adhered to everyday. While walking through my neighborhood, the odors were bad on December 1st, 2nd, 4th, and 8th. Having a bio-cover on an "as needed" basis is not even scientifically measurable. "As needed" in whose opinion? This is a slippery slope phrase. It's just convenient for Grimm's but to the detriment of the neighbors. There is NO benefit to the local community if the bio-cover is reduced to any degree. What would be the purpose in taking a regressive action on the license renewal? What is going to happen to the odors and dust particles when Grimm's reaches full operating capacity? Thank you for reading and seriously considering our public comments.

**Comment #21**

**From:** Wufoo  
**To:** [SWICC](#)  
**Subject:** [External sender]Comment on Grimm's Fuel Company, Inc. [#21]  
**Date:** Sunday, December 10, 2023 10:32:59 PM

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**CAUTION:** This email originated from an **External source**. Do not open links or attachments unless you know the content is safe.

Email \*

[REDACTED]

Zip code \*

97062

What would you like to share with Metro about the Grimm's Fuel Company, Inc. solid waste facility license application? \*

This location is quiet but is awful with the smells. In summer it's unbearable and we can't have our windows open. It smells as if there is a sewer leak mixed with rotting garbage. It's a shame that the smell is so bad. It also makes going to the animal preserve across 99 unpleasant to go to. Please have stricter rules or not renew



## Comment #22

**From:** Wufoo  
**To:** [SWICC](#)  
**Subject:** [External sender]Comment on Grimm's Fuel Company, Inc. [#22]  
**Date:** Tuesday, December 12, 2023 10:35:52 AM

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**CAUTION:** This email originated from an **External source**. Do not open links or attachments unless you know the content is safe.

Email \*

Name

Zip code \*

97224

What would you like to share with Metro about the Grimm's Fuel Company, Inc. solid waste facility license application? \*

Jeff Grimm admitted at the Metro Info session that his company would double its composting operations in 2024. This means only one thing: an increase in the severity and frequency of the odor-emitting compost. Yet, the company wants to change the existing requirement of 12-inches bio-cover to "as needed", whatever that means. Current pollution levels drift more than 1 mile away with worse to come if Metro's current bio-cover requirement is changed so that covering the compost is solely in Grimm's discretion. Such a change, particularly given Grimm's increased production, means increased intensity of odor pollution and decreased air quality which will affect more and more citizens in a larger area around the plant in a residential population which is growing. The requested change will also mean possible adverse health consequences and hazards, particularly for the aging citizens immediately adjacent to the plant. Changing Metro's current regulation will also decrease the use and enjoyment, as well as the market value, of each resident's homestead. Grimm's increased production next year (now at 50%) will certainly increase its profits; it should use some of those increased profits to fund continuous use of the bio-covers rather than cut back their use. It is the continuous use of these covers which can stabilize and protect air quality. The requested change can only diminish air quality. Metro's current regulation is reasonable and the need for its continuation unchanged far outweighs any claimed inconvenience to Grimm's. Jeff Grimm and his family, unlike us citizens, do not live nearby the plant.

**Comment #23**

**From:** Wufoo  
**To:** [SWICC](#)  
**Subject:** [External sender]Comment on Grimm's Fuel Company, Inc. [#23]  
**Date:** Tuesday, December 12, 2023 2:29:06 PM

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Email *	[REDACTED]
Name	[REDACTED]
Address	[REDACTED] SW 135th Terrace
	Tualatin
	OR
Zip code *	97062
What would you like to share with Metro about the Grimm's Fuel Company, Inc. solid waste facility license application? *	I HAVE LIVED NEAR GRIMM'S FOR 27 YEARS. PLEASE DON'T LET US GO BACK TO THE STENCH IT WAS YEARS AGO. IT'S BAD ENOUGH NOW. REMEMBER OUR OREGON ENVIRONMENTAL PRIDE. PLEASE!

## Comment #24

**From:** Sherilyn Lombos  
**To:** [Joanna Dyer](#); [SWICC](#)  
**Cc:** [Council](#); [Megan George](#); [Steve Koper](#); [Kim McMillan](#)  
**Subject:** [External sender]Public Notice - Grimm's Fuel Company, Inc.  
**Date:** Wednesday, December 13, 2023 2:21:26 PM  
**Attachments:** [Grimms-LetterToMetroRelicense121123.pdf](#)

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**CAUTION:** This email originated from an **External source**. Do not open links or attachments unless you know the content is safe.

Hello Joanna and team,

At the December 11, 2023 City Council meeting, the Tualatin City Council discussed the Grimm's Fuel license renewal and directed me to send the attached comment letter.

If you have any questions, please feel free to reach out.

Sincerely,

*Sherilyn Lombos*

Tualatin City Manager

Desk: 503.691.3010 | Mobile: 971.998.4127

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**From:** Oregon Metro Solid Waste Compliance <[swicc@oregonmetro.gov](mailto:swicc@oregonmetro.gov)>  
**Sent:** Thursday, November 16, 2023 9:09 AM  
**To:** Sherilyn Lombos <[slombos@tualatin.gov](mailto:slombos@tualatin.gov)>  
**Subject:** Public Notice - Grimm's Fuel Company, Inc.

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Metro logo



## Public Notice - Grimm's Fuel Company, Inc. license renewal

Comment by 5pm on December 15, 2023

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Hello,

You are receiving this message because you or your organization is located near Grimm's Fuel Company, Inc. (Grimm's), a Metro-licensed compost facility located at 18850 SW Cipole Road in Tualatin, or because you previously indicated interest in receiving general updates about garbage and recycling matters in the Metro region.

Grimm's submitted an application to Metro to renew its solid waste facility license to operate a compost facility that receives and processes source-separated yard debris, land clearing debris, horse manure and stable bedding. The facility does not accept food waste. Grimm's completed the installation of an aerated static pile (ASP) system in September 2020, which led to a 98 percent reduction in the number of odor-related complaints received by Metro about the facility. The ASP system uses pressure blowers and distribution pipes to push or pull air through compost piles to maintain the ideal oxygen rates and temperatures for composting, which minimizes odors.

Grimm's has proposed two changes to the facility's current operation in its license renewal application:

1. Reduce the frequency of oxygen monitoring from daily to weekly.
2. Reduce the requirement for the use of a bio-cover from 12 inches to as needed to minimize odors.

For additional information on this facility, the proposed changes and to view the application submitted, visit the [Grimm's Fuel Company public notice webpage](#). Additional public notices are available on the [Metro solid waste public notice webpage](#).

**Metro is providing the opportunity for the public to review and comment on Grimm's application from Thursday, Nov. 16 to Friday, Dec. 15, 2023.**

Metro will consider the comments received during the public notice period when determining whether to approve the application and the proposed changes to the operation. If approved, the renewed license would take effect on January 1, 2024 and remain in effect for five years.

Comments may be submitted [online](#) or by calling 503-505-5587. In an effort to include more voices in Metro's solid waste facility public comment process, the

phone line features recorded messages in English, Spanish, Russian, Vietnamese, Korean and Mandarin. Please note that the phone line is used for receiving public comments only. All messages received will be transcribed and Metro will respond to comments in a staff report that will be posted on the Grimm's public notice webpage when available.

### **Public information session**

Metro will host a virtual information session on the proposed license renewal for Grimm's at **6 p.m. on Tuesday, December 5, 2023**. This is an optional information session and is not required to submit comments. During the session, you will receive an overview of the facility, learn more about the requested changes to operation and have the opportunity to ask questions. Metro will not accept public comments on the application during the meeting. You must [register in advance](#) to participate.

Please forward this to your networks. If you no longer wish to receive this kind of message, please click the unsubscribe link below.

Thank you,

Joanna Dyer

Solid Waste Authorization Coordinator

Metro

Waste Prevention and Environmental Services

[joanna.dyer@oregonmetro.gov](mailto:joanna.dyer@oregonmetro.gov)

---

**[Signup to receive updates on the Waste Prevention and Environmental Services work that matters to you.](#)**

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# City of Tualatin

[www.ci.tualatin.or.us](http://www.ci.tualatin.or.us)

Metro, Waste Prevention and Environmental Services

Attn: Joanne Dyer

600 NE Grand Ave

Portland OR 97232

[Joanna.dyer@oregonmetro.gov](mailto:Joanna.dyer@oregonmetro.gov)

RE: Public Comment on Grimm's Fuel Company, Inc. Solid Waste Facility License Renewal

The City of Tualatin appreciates the opportunity to comment on Grimm's application to renew its license. The Tualatin community has lived side-by-side with Grimm's Fuel for decades, at various times and seasons Tualatin residents have experienced episodes of foul odor emanating from Grimm's Fuel, generating myriad complaints to the City, Metro, and DEQ. The issue came to a head in 2018 when odor events were increasingly noxious, lengthy, and regular. The Tualatin City Council was inundated with hundreds of complaints about the smell. It was the subject of numerous neighborhood meetings, letter-writing campaigns, and research into industry trends.

In response to the outpouring of community feedback, Metro required Grimm's to install an aerated static pile system. That, along with the other measures required during the license renewal process, drastically reduced the foul odor that caused severe livability issues in and around the Grimm's facility. By all accounts, odor control at the facility has been outstanding, for which the entire community is thankful.

We strongly encourage that neither of the requirements be modified as requested. No one wants to be back where we were in 2018. The investments in the Grimm's facility have paid off, returning quality of life to the surrounding community, and it is imperative that the status quo be maintained, if not enhanced.

Of particular concern is the request to remove the 12-inch bio-cover requirement. In the materials that Green Mountain Technologies submitted they recommend that "*enough bio-cover materials be readily available to apply if conditions change and a persistent offsite odor event occurs.*" Instead of being proactive, as has been the case, that recommendation is reactive, suggesting that the piles would be covered in the case of a "persistent offsite odor event." The Tualatin community deserves better than a plan that reacts only after an event occurs.

Thank you for the opportunity to comment and thank you in advance for your consideration.

A handwritten signature in blue ink that reads "Frank Bubenik".

Frank Bubenik

Mayor

**Comment #25**

**From:** Wufoo  
**To:** [SWICC](#)  
**Subject:** [External sender]Comment on Grimm’s Fuel Company, Inc. [#24]  
**Date:** Wednesday, December 13, 2023 4:20:29 PM

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Email *	[REDACTED]
Name	[REDACTED]
Zip code *	97062

What would you like to share with Metro about the Grimm's Fuel Company, Inc. solid waste facility license application? \*

The experts have flip-flopped.

In 2018, GMT consultants, hired by Metro, prepared a report that included making a recommendation for 12 inches of bio cover and that requirement is currently in effect. Now the same consultants, after being hired by Grimm’s, have completely changed their opinion without any reasonable justification. GMT consultants, which were formerly hired by Metro, have flip-flopped since they are now paid by Grimm’s and that is a huge conflict of interest.

Also, at the webinar held on Dec. 5, 2023, the only response that Jeff Grimm gave to reduce the bio cover is the heat and fatigue of the employees. The well being of the citizens surrounding Grimm’s and the air quality far outweigh this. The cost to Grimm’s of maintaining the bio cover at 12 inches is far less than the benefits to the community as a whole. But in reality, Metro has already given Grimm’s \$750,000 in the past for a grant and now, Grimm’s, after hiring GMT to reverse their opinion, should not deprive the community of the bio covers which has improved air quality and minimized health hazards since it was 1st required.

Basically, Grimm’s is asking Metro, without adequate justification and reliable evidence to reverse course of protecting public interest thru removal of the continuous use of the 12 inch bio cover. Allowing Grimm’s to make their own decisions about when to use the bio covers and when not to use them is unacceptable. The cost benefits to the citizens far outweigh the cost to Grimm’s to continue to comply with GMT consultants original opinion. Do not give Grimm’s a blank check to make their own decisions about when to use the bio covers and when not to use them.

Dear Metro:

We are impacted by the composting operation at Grimm’s Fuel and we insist that Metro maintain the existing requirement of 12-inches of bio-cover on all sides of the compost piles. The license requirement is reasonable, feasible, and necessary for the following reasons:

- Short distance between the compost piles and nearby residential areas
- The large radius of current odor impacts
- An expected increase in Grimm’s future composting volume

- The bio-cover is currently working and it is effective
- Green Mountain Technologies recommended a minimum of 12-inches of bio-cover

Current odor impacts exceed one mile in distance, which is more than 4 times Metro's standard quarter-mile radius for mailing public notice postcards. The bio-cover is currently reducing the frequency, severity, and duration of odor impacts on the surrounding community. We are not interested in going backwards or enduring any increase in odor.

Jeff Grim, the owner of Grimm's Fuel, stated at the Metro info session on December 5th, that they are only using about 50% of total system capacity in February. That means that even with the current regulations in place, February odor impacts could double.

Reducing the oxygen monitoring requirement from daily to weekly is reasonable, as long as the new license includes a provision that if the oxygen level dips below normal, monitoring should go back to daily until the cause of the dip is isolated and resolved.

The current complaint-driven operational model is flawed, due to a number of factors, including the technical difficulties with an odor reporting form that does not always work, combined with the disclaimers, technical hurdles, and warnings that Metro staff has added to this form, each of which would result in a decrease in the number of complaints submitted.

Rather than using odor complaints to monitor air quality, a more scientific approach is needed. We are asking Metro to install automated air quality monitoring equipment at the fence line and hire an independent air quality consultant to perform an air quality and odor survey over a period of at least 12 months to take into account all atmospheric conditions. We have a right to know what is in the air that we are breathing. The health impacts of living downwind from this facility have never been studied, and it is time to address this issue.

Metro has an obligation to protect the public from both current and future impacts. The bio-cover is necessary, it is currently working, and it's removal would be negligent and unjustified.

Thank you for your consideration.



## Comment #26

**From:** Wufoo  
**To:** [SWICC](#)  
**Subject:** [External sender]Comment on Grimm's Fuel Company, Inc. [#25]  
**Date:** Thursday, December 14, 2023 10:56:04 AM

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Email *	[REDACTED]
Name	[REDACTED]
Address	[REDACTED] SW MacBeth Drive
	King City
	Oregon
Zip code *	97224

What would you like to share with Metro about the Grimm's Fuel Company, Inc. solid waste facility license application? \*

I live in the Roseberry neighborhood, off Fischer Rd and 131st Ave. I've been in this area for 8 years and remember well the stench emanating from Grimm's Fuel Company prior to the current mitigation measures. It was unpleasant but when really bad, kept us indoors with our windows shut. Neighbors with asthma or other respiratory issues were even more deeply impacted. The changes requested by Grimm's should be denied. What is in place now is working, keeping smells and pollution from their facility to a minimum – why change that? Metro has an obligation to protect us from the negative impacts of businesses like Grimm's and should absolutely deny any changes to current licensure. Grimm's is a local business and I want it to thrive as well – it seems to be doing fine under its current restrictions so I cannot see any justification to allowing changes that will certainly negatively impact the greater community. Thank you

## Comment #27

**From:** Wufoo  
**To:** [SWICC](#)  
**Subject:** [External sender]Comment on Grimm's Fuel Company, Inc. [#26]  
**Date:** Thursday, December 14, 2023 2:23:45 PM

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Email *	[REDACTED]
Name	[REDACTED]
Address	[REDACTED] SW 93rd Ter
	Tualatin
	OR
Zip code *	97062

What would you like to share with Metro about the Grimm's Fuel Company, Inc. solid waste facility license application? \*

Up until recently we lived in our townhouse in the core of Tualatin next to the Lake of the Commons. We were miles away from Grimm's. I VERY frequently smelled the Grimm's odor in my home, outside, or across the street in Community Park. It took me a long while to realize I could report it. And even then, there were barriers. With the changes at Grimm's, the odors were greatly reduced. PLEASE require Grimm's to keep the required 12" of biocover. And PLEASE require a system of monitoring that isn't complaint driven. We now live in a home in South Tualatin. It is my hope we never have to smell Grimm's here. Please keep what's in place for ALL the citizens of Tualatin, especially those in neighborhoods closer to Grimm's.

**Comment #28**

**From:** Wufoo  
**To:** [SWICC](#)  
**Subject:** [External sender]Comment on Grimm's Fuel Company, Inc. [#27]  
**Date:** Thursday, December 14, 2023 5:55:36 PM

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Email *	[REDACTED]
Name	[REDACTED]
Address	[REDACTED] SW Garrett Ct
	Tigard
	OR
Zip code *	97223
What would you like to share with Metro about the Grimm's Fuel Company, Inc. solid waste facility license application? *	Current mitigation requirements are working. Why make adjustments? If a business requests to be licensed in a prime residential location it should be understood additional requirements should be met so as to not infringe on the livability & comfort of others. We must pay Grimms to recycle yard & vegetation and they in turn treat and resell various products from the recycled material. Pretty good business model.

**Comment #29**

**From:** Wufoo  
**To:** [SWICC](#)  
**Subject:** [External sender]Comment on Grimm's Fuel Company, Inc. [#28]  
**Date:** Thursday, December 14, 2023 6:21:28 PM

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Email *	[REDACTED]
Name	[REDACTED]
Address	[REDACTED] SW Century Oak Drive
	Tigard
	Oregon
Zip code *	97224
What would you like to share with Metro about the Grimm's Fuel Company, Inc. solid waste facility license application? *	I am opposed to any changes in the current requirements for Grimm's Fuel Company. The persistent smell has all but disappeared since the current requirements were enacted. I am asking that Metro act in the best interests of the larger community and reject changes to Grimm's licensing requirements.

**Comment #30**

**From:** Wufoo  
**To:** [SWICC](#)  
**Subject:** [External sender]Comment on Grimm's Fuel Company, Inc. [#29]  
**Date:** Thursday, December 14, 2023 7:04:09 PM

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Email *	[REDACTED]
Name	[REDACTED]
Address	[REDACTED] Southwest Dakota Circle Tualatin
	OR
Zip code *	97062
What would you like to share with Metro about the Grimm's Fuel Company, Inc. solid waste facility license application? *	Please keep the current standard in place. I have lived in Tualatin from 1979–1987 and 2006 to present and have experienced the stench when the current standards were not in place. I appreciate Grimms but I also appreciate clean air. Thank you!

**Comment #31**

**From:** Wufoo  
**To:** [SWICC](#)  
**Subject:** [External sender]Comment on Grimm's Fuel Company, Inc. [#30]  
**Date:** Thursday, December 14, 2023 8:02:10 PM

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Email *	[REDACTED]
Name	[REDACTED]
Address	[REDACTED] sw umiat Tualatin Oregon
Zip code *	97062
What would you like to share with Metro about the Grimm's Fuel Company, Inc. solid waste facility license application? *	Grimm's has been around a long time and what they do does not harm any one or any thing and they have actually helped are environment by every one using there facility to recycle there yard and farm debris, before every one use there back yards and burn every thing and there was so much smoke at times it was terrible, I feel that Grimm's has done an excellent job in maintaining their facility and also supplying the Washington County with their yard supplies, LEAVE THEM ALONE

**Comment #32**

**From:** Wufoo  
**To:** [SWICC](#)  
**Subject:** [External sender]Comment on Grimm's Fuel Company, Inc. [#31]  
**Date:** Thursday, December 14, 2023 8:51:41 PM

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Email *	[REDACTED]
Name	[REDACTED]
Zip code *	97062

What would you like to share with Metro about the Grimm's Fuel Company, Inc. solid waste facility license application? \*

Dear Metro:

We are impacted by the composting operation at Grimm's Fuel and we insist that Metro maintain the existing requirement of 12-inches of bio-cover on all sides of the compost piles. The license requirement is reasonable, feasible, and necessary for the following reasons:

- Short distance between the compost piles and nearby residential areas
- The large radius of current odor impacts
- An expected increase in Grimm's future composting volume
- The bio-cover is currently working and it is effective
- Green Mountain Technologies recommended a minimum of 12-inches of bio-cover
- Current odor impacts exceed one mile in distance, which is more than 4 times Metro's standard quarter-mile radius for mailing public notice postcards. The bio-cover is currently reducing the frequency, severity, and duration of odor impacts on the surrounding community. We are not interested in going backwards or enduring any increase in odor.

Jeff Grim, the owner of Grimm's Fuel, stated at the Metro info session on December 5th, that they are only using about 50% of total system capacity in February. That means that even with the current regulations in place, February odor impacts could double.

Reducing the oxygen monitoring requirement from daily to weekly is reasonable, as long as the new license includes a provision that if the oxygen level dips below normal, monitoring should go back to daily until the cause of the dip is isolated and resolved.

The current complaint-driven operational model is flawed, due to a number of factors, including the technical difficulties with an odor reporting form that does not always work, combined with the disclaimers, technical hurdles, and warnings that Metro staff has added to this form, each of which would result in a decrease in the number of complaints submitted.

Rather than using odor complaints to monitor air quality, a more scientific approach is needed. We are asking Metro to install automated air quality monitoring equipment at the fence line and hire an

independent air quality consultant to perform an air quality and odor survey over a period of at least 12 months to take into account all atmospheric conditions. We have a right to know what is in the air that we are breathing. The health impacts of living downwind from this facility have never been studied, and it is time to address this issue.

Metro has an obligation to protect the public from both current and future impacts. The bio-cover is necessary, it is currently working, and its removal would be negligent and unjustified.

Thank you for your consideration.

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### Comment #33

**From:** Wufoo  
**To:** [SWICC](#)  
**Subject:** [External sender]Comment on Grimm's Fuel Company, Inc. [#32]  
**Date:** Thursday, December 14, 2023 9:09:06 PM

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Email *	[REDACTED]
Name	[REDACTED]
Address	[REDACTED] SW Pawnee Path Tualatin OR
Zip code *	97062
What would you like to share with Metro about the Grimm's Fuel Company, Inc. solid waste facility license application? *	I like Grimm's Fuel Company's current program to reduce smells. It is working well for me and my family. I remember what it was like before the current action plan was put into place and it was stinky.

**Comment #34**

**From:** Wufoo  
**To:** [SWICC](#)  
**Subject:** [External sender]Comment on Grimm's Fuel Company, Inc. [#33]  
**Date:** Thursday, December 14, 2023 9:35:38 PM

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Email *	[REDACTED]
Name	[REDACTED]
Address	[REDACTED] SW Rayborn Ct Tualatin OR
Zip code *	97062
What would you like to share with Metro about the Grimm's Fuel Company, Inc. solid waste facility license application? *	Please do not allow reduction of the biocover. There has been poor air quality at times by my home because of Grimms.

## Comment #35

**From:** Wufoo  
**To:** [SWICC](#)  
**Subject:** [External sender]Comment on Grimm's Fuel Company, Inc. [#34]  
**Date:** Thursday, December 14, 2023 11:51:17 PM

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Email *	[REDACTED]
Name	[REDACTED]
Address	[REDACTED] SW Springtooth Lane
	Sherwood
	OR
Zip code *	97140
What would you like to share with Metro about the Grimm's Fuel Company, Inc. solid waste facility license application? *	I don't support the request for changes. I drive between Sherwood and King City twice each weekday and there are occasions when the smell from Grimms is quite pungent. Reducing requirements would just make these occurrences more frequent.

**Comment #36**

**From:** Wufoo  
**To:** [SWICC](#)  
**Subject:** [External sender]Comment on Grimm's Fuel Company, Inc. [#35]  
**Date:** Friday, December 15, 2023 1:41:40 AM

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Email *	[REDACTED]
Name	[REDACTED]
Zip code *	97224

What would you like to share with Metro about the Grimm's Fuel Company, Inc. solid waste facility license application? \*

I moved to Summerfield almost 5 years ago and smell drove me to attend a couple of public hearings. I was glad to learn that solutions were in the works because I recognize the need for facilities/business like Grimms. I rarely smell the composting these days, so the easy answer is 'They should keep doing what they are doing.' But I want Grimm to continue to meet our community's needs.

For O2 readings, how quickly do these numbers change. The "18% average O2 Level" statistic doesn't help decide if a weekly reading is frequent enough to predict an "event" in time to mitigate it.

Perhaps an oxygen test schedule of every 3 day might be a better first step?

As for the second proposed change, that seems dangerously vague. "As needed" – defined how? Are there objective indicators for when the bio-cover might be needed, or is going to be based on how many complaints are coming in to the county? I think I would want more clear rules dictating the use, rather than someone's subjective determination of "need."

Thank you for taking feedback on this issue. It clearly is a quality of life issue for many of us.

---

**Comment #37**

**From:** Wufoo  
**To:** [SWICC](#)  
**Subject:** [External sender]Comment on Grimm's Fuel Company, Inc. [#36]  
**Date:** Friday, December 15, 2023 10:31:47 AM

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**CAUTION:** This email originated from an **External source**. Do not open links or attachments unless you know the content is safe.

Email *	[REDACTED]
Name	[REDACTED]
Address	[REDACTED] SW 135th Ter Tualatin OR 97062

What would you like to share with Metro about the Grimm's Fuel Company, Inc. solid waste facility license application? \*

I serve as the President of Riverpark Community Involvement Organization, the closest residential CIO to Grimm's. Our membership includes and reaches out to approximately 3,000 homes. Our Board supports members by working with the City of Tualatin and other government agencies when questions, ideas or complaints are brought to our attention. Prior to the modernization of Grimm's, there were hundreds upon hundreds of complaints regarding the putrid odor experienced almost daily by residents.

Public notice to comment on the new license has been limited to mailings within 1/4 mile from Grimm's. Pony Ridge and Angel Haven are directly across 99W from the composting facility. That means that less than 60 of the 253 closest neighbors have received notice.

Grimm's new modern system of composting is much improved, with only intermittent offsite odors. IT WORKS! Any change that lessens the modernization process by ignoring daily oxygen levels and removing the bio cover requirements are not in the best interest of our community.

**Comment #38**

**From:** Wufoo  
**To:** [SWICC](#)  
**Subject:** [External sender]Comment on Grimm's Fuel Company, Inc. [#37]  
**Date:** Friday, December 15, 2023 10:49:32 AM

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Email *	[REDACTED]
Name	[REDACTED]
Address	[REDACTED] SW 135th Terrace
	Tualatin
	Oregon
Zip code *	97062

What would you like to share with Metro about the Grimm's Fuel Company, Inc. solid waste facility license application? \*

I am one of the many Tualatin residents that live or work around the Grimm's facility, and was active in the permitting process several years ago.

Grimm's has operating requirements as a result of the changing standards for residents and overall livability for residents and workers for miles around the facility. People do not want to be around the industrial produced gases and fumes, however much needed. In the case of Grimm's, a proven and safe method was put in place that overcame the unpleasant and unhealthy smells of rotting vegetation. If not kept under control, then the larger community will no doubt again start the process of advocating for even stricter conditions.

I would support Grimm's introducing automated processes that create a historical record of meeting the standards currently in place. This would provide a factual base which may suggest other changes, or improvements, that benefit residents or Grimm's business management.

Keep what works or strengthens protections for people.

[REDACTED]

**Comment #39**

**From:** Brett Hamilton  
**To:** [SWICC](#)  
**Cc:** [Joanna Dyer](#)  
**Subject:** [External sender]Public Comments  
**Date:** Friday, December 15, 2023 12:57:40 PM  
**Attachments:** [BHPC2023121502.pdf](#)  
[MET2022110301.pdf](#)  
[OAPC2023121401.pdf](#)

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Dear Metro,

Attached please find my public comments in regards to Grimm's license renewal, including the Oregon Air response and Metro's November 2022 warning letter.

Thank you, [REDACTED]

Dear Metro,

Thank you for making public the letter of support submitted by Green Mountain Technologies (GMT) and for providing an opportunity to respond. There are a number of problematic statements in that letter that I would like to address.

Back in 2018, Metro contracted with GMT to produce a comprehensive and detailed report that made evidence-based recommendations for specific license conditions including:

“Minimum Biocover Thickness Of 12-inches Over All Surfaces Of Active And Curing Piles” (Slide 47 of the GMT Presentation)

This bio-cover provides a number of practical benefits including odor control and a reduction in VOC emissions. The bio-cover is also a crucial part of the Process To Further Reduce Pathogens:

“To meet PFRP they [the piles] must be insulated with a biocover (usually older compost and overs) and achieve more than 131° F for 3 days throughout the pile.”  
(GMT Report Page 13)

However, in their letter of support, GMT now calls this very same bio-cover requirement “unnecessary and excessive” without addressing their past statements or their current conflict of interest. As Jeff Grimm mentioned last week, “their position has changed quite often I think.”

There is no objective odor standard in the current Metro license. Attempting to use odor reports as the primary air-quality metric is a flawed approach, especially when the operator continues to deny that the odors are coming from his facility. GMT’s letter claims that odors that are manure or chemical in nature are not attributable to Grimm’s:

“Fifteen of these complaints were either up-wind of the compost site, chemical or manure odor and not attributable to the Grimm’s.”

However, records show that Grimm’s accepts manure and animal bedding as an incoming feedstock, and GMT previously described the odor from Grimm’s compost pile as “chemical”:

Once sampling from within the pile began, using the sampling pumps, the odors changed substantially in character to “oily rag”, “chemical”, “paint thinner”, and “icky”  
(GMT Report Page 47)

In their letter, GMT lists three facilities that run positive-only aeration without a bio-cover, but none of these facilities are comparable to Grimm’s due to the much longer distance separating these facilities from their nearest residential neighbors. The way airborne odors mix with fresh air, distance from the source determines the intensity, duration, and frequency of odor impacts.

The distance between Grimm’s compost piles and the nearest residence is 650ft. At the Pierce County Recycling Facility in Purdy Washington, that distance is 1,670 feet (more than 2.5X Grimm’s distance) and the compost piles in Purdy are sheltered under a roof in a wooded area. The distance at Allwood Recyclers in Troutdale OR is 2,612 feet (3.9X) and at Vision Recycling (Livermore, CA) the distance is 8,976 feet (13X).

In consideration of these issues, plus those outlined in the Oregon Air response, I ask that Metro deny the current proposal and do not modify the bio-cover requirement. 12-inches of bio-cover is effective, feasible, justified, and appropriate for this site.

Thank you for your consideration.







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

November 3, 2022

**\*\*EMAIL TRANSMISSION ONLY\*\***

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

RE: Warning Letter (No. WL-446-22)  
*Failure to comply with license conditions; apply bio-cover at minimum depth of 12 inches covering all sides of the piles.*

Dear Jeff Grimm:

This letter is to notify you that Grimm's Fuel Company (Grimm's) failed to comply with its license conditions when it performed an unauthorized trial of compost operations without a bio-cover in April, June and July 2022. This Warning Letter is not a Notice of Violation.

Metro Code Section 5.01.320(a) states in part that any person who fails to comply with a license condition is subject to the fines and penalties set forth in that chapter.

Solid Waste Facility License No. L-043-19, Section 7.8 b, Procedures for pile maintenance states: *Applying and maintaining a cover, such as bio-cover comprised of a designed mix of porous overs and composted materials applied at a minimum depth of 12-inches and covering all sides of the piles. The licensee must use an approved bio-cover unless an alternate cover is pre-approved in writing by Metro.*

As you are aware, in August 2022, Grimm's submitted to Metro and Oregon Department of Environmental Quality (DEQ) proposed changes to its Operations Plan to change the requirement to cover *all active compost piles* with 12" of finished compost or compost overs ("bio-cover"), to instead covering active piles on an *as needed* basis to minimize odors and decrease oxygen readings from daily to weekly. In its letter to Metro dated August 11, 2022, Grimm's described that the facility conducted two separate and unauthorized trials in April and June of 2022, supported by Green Mountain Technology who designed Grimm's system, during which it operated without the use of bio-cover on active compost piles as required by its Metro license.

On July 18, 2022, while on site for a regular unannounced inspection, Grimm's informed Metro Facility Inspector Chris Papinsick that it was operating without the required 12-inch bio-cover. Metro instructed Grimm's to immediately cover each active pile with bio-cover as required, which Grimm's began that same day and completed the following day as reported to Metro via email. An unannounced follow-up inspection was performed on August 12, 2022, and Grimm's was actively

Grimm's Fuel Company

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applying bio-cover to recently turned piles and all other piles had appropriate bio-cover as required.

Metro informed Grimm's that updating its Operating Plan is insufficient to implement the changes as requested, and it must apply for a change of authorization to amend its license provisions to implement its proposed changes. Grimm's Metro issued license will expire December 31, 2023, and its DEQ permit expires November 2023, therefore Metro encourages Grimm's to continue to apply bio-cover and monitor oxygen as required and re-submit its proposed changes and supporting documentation during its license renewal application.

In the future, Grimm's may be subject to enforcement action including civil penalty if the facility fails to comply with license conditions.

Thank you for your attention to this matter.

Sincerely,

DocuSigned by:



A6212F1279BB4C8...

**Warren Johnson**

**Standards and Compliance Manager**

Cc: Pam Peck, Metro

Hila Ritter, Metro

Chris Papinsick Metro

Audrey O'Brien, Oregon DEQ

Dear Metro:

We are impacted by the composting operation at Grimm's Fuel and we insist that Metro maintain the existing requirement of 12-inches of bio-cover on all sides of the compost piles. The license requirement is reasonable, feasible, and necessary for the following reasons:

- Short distance between the compost piles and nearby residential areas
- The large radius of current odor impacts
- An expected increase in Grimm's future composting volume
- The bio-cover is currently working and it is effective
- Green Mountain Technologies recommended a minimum of 12-inches of bio-cover

Current odor impacts exceed one mile in distance, which is more than 4 times Metro's standard quarter-mile radius for mailing public notice postcards. The bio-cover is currently reducing the frequency, severity, and duration of odor impacts on the surrounding community. We are not interested in going backwards or enduring any increase in odor,

Jeff Grim, the owner of Grimm's Fuel, stated at the Metro info session on December 5th, that they are only using about 50% of total system capacity in February. That means that even with the current regulations in place, February odor impacts could double.

Reducing the oxygen monitoring requirement from daily to weekly is reasonable, as long as the new license includes a provision that if the oxygen level dips below normal, monitoring should go back to daily until the cause of the dip is isolated and resolved.

The current complaint-driven operational model is flawed, due to a number of factors, including the technical difficulties with an odor reporting form that does not always work, combined with the disclaimers, technical hurdles, and warnings that Metro staff has added to this form, each of which would result in a decrease in the number of complaints submitted.

Rather than using odor complaints to monitor air quality, a more scientific approach is needed. We are asking Metro to install automated air quality monitoring equipment at the fence line and hire an independent air quality consultant to perform an air quality and odor survey over a period of at least 12 months to take into account all atmospheric conditions. We have a right to know what is in the air that we are breathing. The health impacts of living downwind from this facility have never been studied, and it is time to address this issue.

Metro has an obligation to protect the public from both current and future impacts. The bio-cover is necessary, it is currently working, and it's removal would be negligent and unjustified.

Thank you for your consideration.

**Comment #40**

**From:** Wufoo  
**To:** [SWICC](#)  
**Subject:** [External sender]Comment on Grimm’s Fuel Company, Inc. [#38]  
**Date:** Friday, December 15, 2023 4:10:32 PM

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**CAUTION:** This email originated from an **External source**. Do not open links or attachments unless you know the content is safe.

Email *	[REDACTED]
Name	[REDACTED]
Address	[REDACTED] SW 115th Ave. #5
	Tualatin
	OR
Zip code *	97062

What would you like to share with Metro about the Grimm's Fuel Company, Inc. solid waste facility license application? \*

Dear Metro:

My health is impacted by the composting operations performed at Grimm’s Fuel and I insist that Metro maintain the existing requirement of 12–inches of bio–cover on all sides of the compost piles. The current license requirement is reasonable, feasible, and necessary for the following reasons:

- Short distance between the compost piles and nearby residential areas
- The large radius of current odor impacts
- An expected increase in Grimm’s future composting volume
- The current bio–cover requirement is currently working and it is effective
- Green Mountain Technologies recommended a minimum of 12–inches of bio–cover

Current odor impacts exceed one mile in distance, which is more than 4 times Metro’s standard quarter–mile radius for mailing public notice postcards. The bio–cover is currently reducing the frequency, severity, and duration of odor impacts on the surrounding community. My neighborhood and I are not interested in going backwards or enduring any increase in odor.

Jeff Grimm, the owner of Grimm’s Fuel, stated at the Metro info session on December 5th, that they are only using about 50% of total system capacity in February. That means that even with the current regulations in place, February odor impacts could double.

Reducing the oxygen monitoring requirement from daily to weekly is reasonable, as long as the new license includes a provision that if the oxygen level drops below normal, monitoring should go back to daily until the cause of the drop is isolated and resolved.

The current complaint–driven operational model is flawed, due to a number of factors, including the

technical difficulties with an odor online reporting form that does not always work, combined with the disclaimers, technical hurdles, and warnings that Metro staff has added to this form, each of which would result in a decrease in the number of complaints submitted, which is not acceptable.

Rather than using odor complaints to monitor air quality, a more scientific approach is needed. I am asking Metro to install automated air quality monitoring equipment at the fence line and hire an independent air quality consultant to perform an air quality and odor survey over a period of at least 12 months to take into account all atmospheric conditions. As a person living with pulmonary issues, I have a right to know what is in the air that I am breathing. The health impacts of living downwind from this facility have never been studied, and it is time to address this issue.

Metro has an obligation to protect the public from both current and future impacts, regardless of what or who the culprit is which causes negative impacts. The bio-cover is extremely necessary, it is currently working, its more sustainable and its removal would be negligent and unjustified. While Grimm's complained at the December meeting that it takes time and money to put a bio-filter in place, there is no reason why they can't increase what they charge customers who do business with them to off-set costs.

Thank you for your consideration,

[REDACTED]

Tualatin, OR

**Comment #41**

**From:** Wufoo  
**To:** [SWICC](#)  
**Subject:** [External sender]Comment on Grimm's Fuel Company, Inc. [#39]  
**Date:** Friday, December 15, 2023 4:28:02 PM

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	[REDACTED] SW 111th Ave.
	Tualatin
	OR
Zip code *	97062

What would you like to share with Metro about the Grimm's Fuel Company, Inc. solid waste facility license application? \*

Most of the change sounds reasonable enough. the vagueness of this wording concerns me a little: "readily available to apply should a persistent offsite odor event occur. " What constitutes "persistent"?

We have now enjoyed years of odor free living (just a mile from Grimms) and appreciate how effective their efforts have been. The prospect of enduring several days in a row of odor is disappointing.

## Comment #42

**From:** Wufoo  
**To:** [SWICC](#)  
**Subject:** [External sender]Comment on Grimm's Fuel Company, Inc. [#40]  
**Date:** Friday, December 15, 2023 4:35:19 PM

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Email *	[REDACTED]
Name	[REDACTED]
Address	[REDACTED] sw 111th ave. Tualatin OR 97062
Zip code *	97062
What would you like to share with Metro about the Grimm's Fuel Company, Inc. solid waste facility license application? *	My concern is with the following statement: "maintain bio-cover materials on site so that they are readily available to apply should a persistent offsite odor event occur." Who decides that the odor has reached pervasive offsite odor level? Does the affected community have to again register complaints? This is vague. The current practice is working. Action needs to be preventative so that a persistent odor never occurs. We don't want to live with that odor issue again.