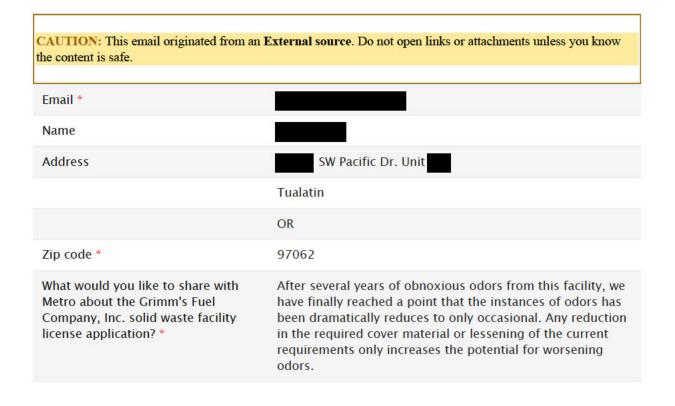
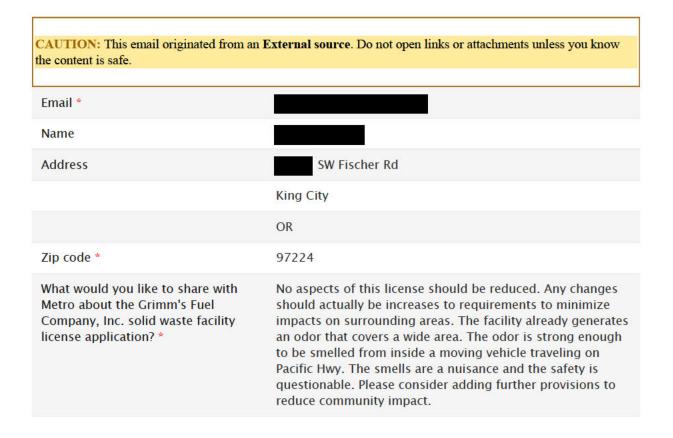
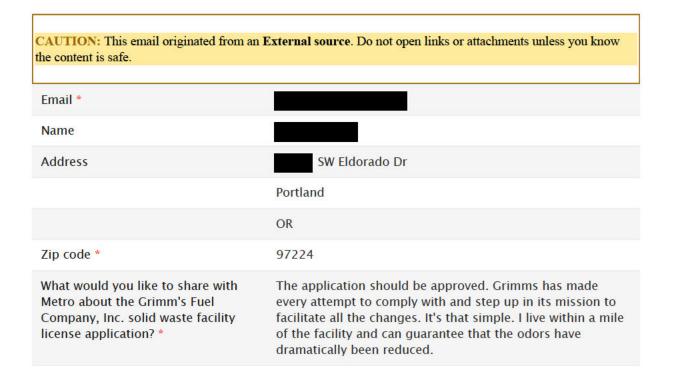
From:	Wufoo
To:	<u>SWICC</u>
Subject:	[External sender]Comment on Grimm's Fuel Company, Inc. 2024 [#2]
Date:	Friday, January 5, 2024 3:45:10 PM



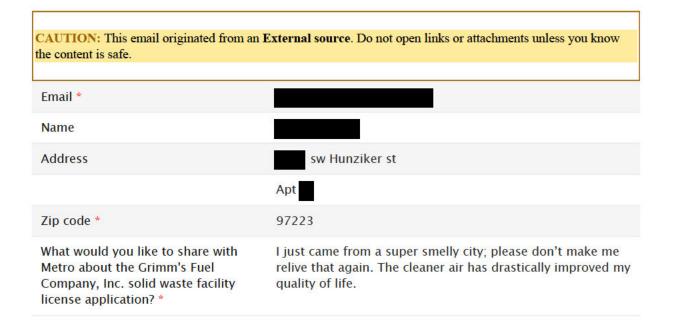
From:	Wufoo
To:	<u>SWICC</u>
Subject:	[External sender]Comment on Grimm's Fuel Company, Inc. 2024 [#3]
Date:	Friday, January 5, 2024 5:37:56 PM



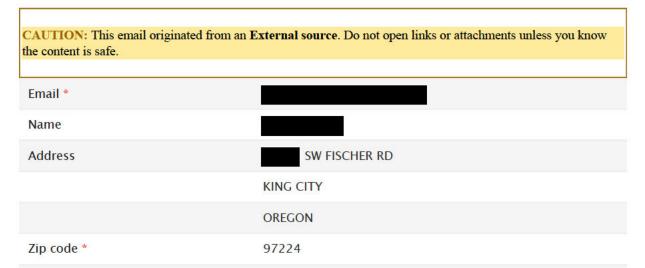
From:	Wufoo
To:	<u>SWICC</u>
Subject:	[External sender]Comment on Grimm's Fuel Company, Inc. 2024 [#4]
Date:	Friday, January 5, 2024 6:42:41 PM



From:	Wufoo
To:	<u>SWICC</u>
Subject:	[External sender]Comment on Grimm's Fuel Company, Inc. 2024 [#5]
Date:	Friday, January 5, 2024 7:53:44 PM



From:	Wufoo
To:	<u>SWICC</u>
Subject:	[External sender]Comment on Grimm's Fuel Company, Inc. 2024 [#6]
Date:	Friday, January 5, 2024 8:31:41 PM



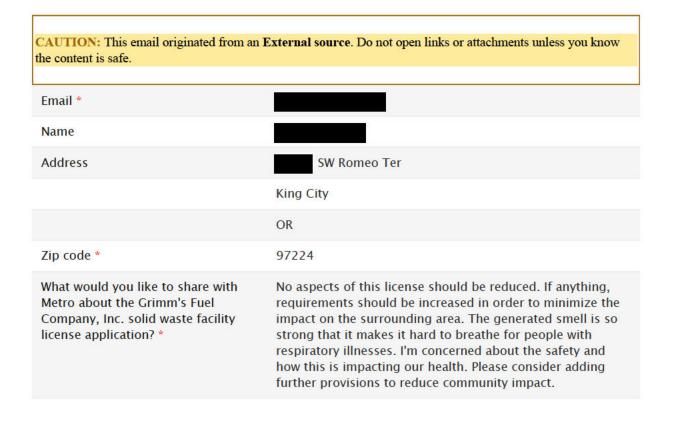
What would you like to share with Metro about the Grimm's Fuel Company, Inc. solid waste facility license application? *

There should be no permissible changes to this license, except addition of monitoring and ensuring ongoing coverage of compostables.

There are vast studies that showcase the health of workers and community members which demonstrate considerable hazards that may be acute and/or chronic respiratory health effects, skin issues and inflammation in even healthy individuals.

The facility already generates an odor that covers a wide area. The odor is strong enough to be smelled from inside a moving vehicle traveling on Pacific Hwy. The smells are a nuisance and the safety, as mentioned, is questionable. Please consider adding further provisions to reduce community impact.

From:	Wufoo	
To:	<u>SWICC</u>	
Subject:	[External sender]Comment on Grimm's Fuel Company, Inc. 2024 [#7]	
Date:	Friday, January 5, 2024 9:05:27 PM	



From:	Wufoo
To:	<u>SWICC</u>
Subject:	[External sender]Comment on Grimm's Fuel Company, Inc. 2024 [#8]
Date:	Saturday, January 6, 2024 6:43:07 AM

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Email *	
Name	
Address	SW Bedford Street
	Tigard
	OR
Zip code *	972241806
What would you like to share with Metro about the Grimm's Fuel Company, Inc. solid waste facility	I support Grimm's Fuel Company's renewal application as proposed.
license application? *	Grimm's is a responsible neighbor and provides a convenient, valuable service to the community.
	Fully support and recommend Metro's approval of license application renewal as presented.

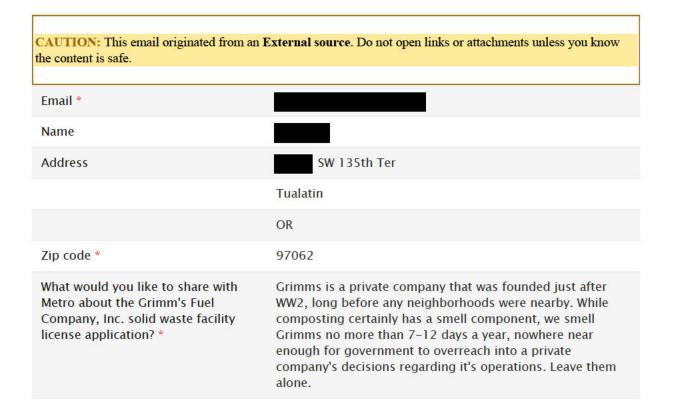
r

From:	Wufoo
To:	<u>SWICC</u>
Subject:	[External sender]Comment on Grimm's Fuel Company, Inc. 2024 [#9]
Date:	Saturday, January 6, 2024 9:11:57 AM

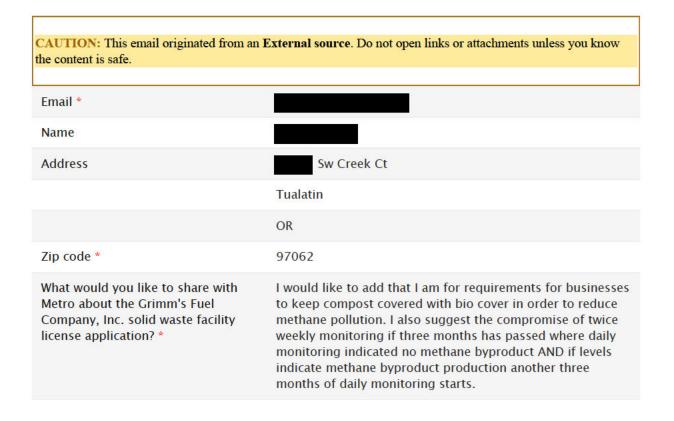
CAUTION: This email originated from an External source. Do not open links or attachments unless you know the content is safe.	
Email *	
Name	
Address	SW King James PL
	King City
	OR
Zip code *	97224
What would you like to share with Metro about the Grimm's Fuel Company, Inc. solid waste facility license application? *	please don't trmove

1

From:	Wufoo
To:	SWICC
Subject:	[External sender]Comment on Grimm's Fuel Company, Inc. 2024 [#10]
Date:	Saturday, January 6, 2024 5:42:37 PM



From:	Wufoo
To:	<u>SWICC</u>
Subject:	[External sender]Comment on Grimm's Fuel Company, Inc. 2024 [#11]
Date:	Sunday, January 7, 2024 1:22:17 AM



From:	Wufoo
To:	<u>SWICC</u>
Subject:	[External sender]Comment on Grimm's Fuel Company, Inc. 2024 [#12]
Date:	Sunday, January 7, 2024 9:03:34 AM

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Email *

Zip code *

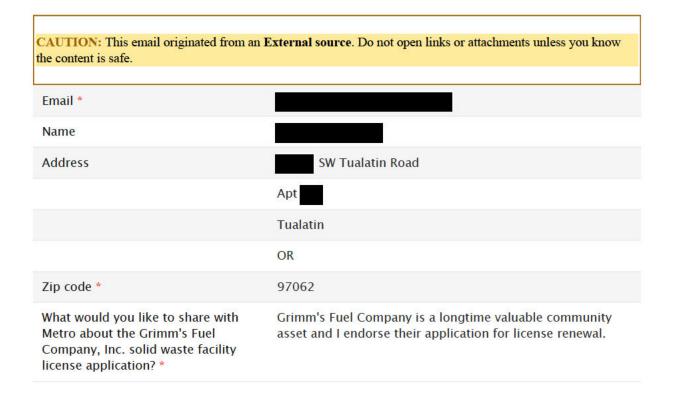
97062

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

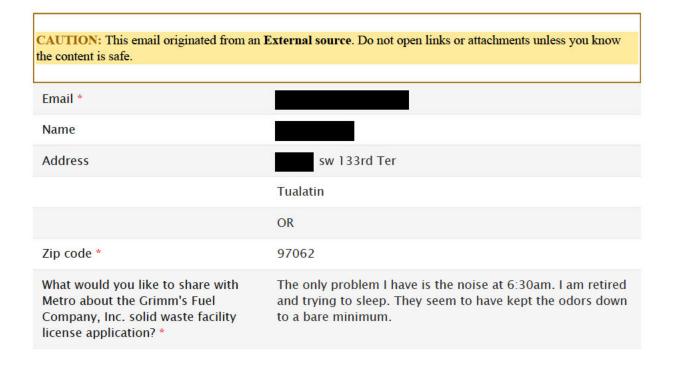
I have no negative comments to write about GRIMM'S Fuel Company. I have not smelled anything coming from this company. This is a locally owned business that has been there for many years and in this day and time after Covid, businesses are closing daily. Shouldn't we support these businesses?

Everything that I have read Grimm's is doing everything they can to suffice these "so called odor's". Also, seems these negative comments are coming from one angry person with too much time on their hands. Maybe someone should investigate about this person. They could be doing this to more than one business.

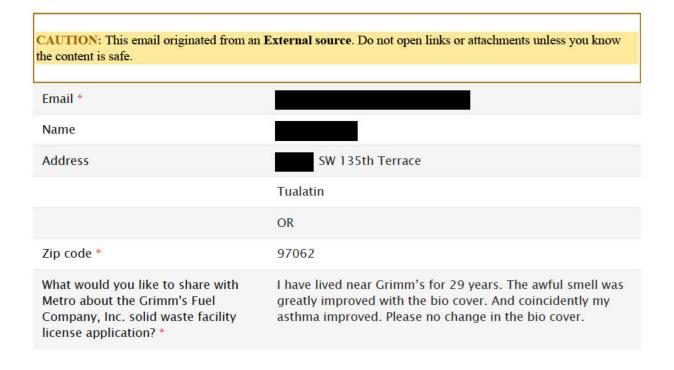
From:	Wufoo
To:	<u>SWICC</u>
Subject:	[External sender]Comment on Grimm's Fuel Company, Inc. 2024 [#13]
Date:	Sunday, January 7, 2024 1:02:50 PM



From:	Wufoo
To:	<u>SWICC</u>
Subject:	[External sender]Comment on Grimm's Fuel Company, Inc. 2024 [#14]
Date:	Monday, January 8, 2024 8:54:13 AM



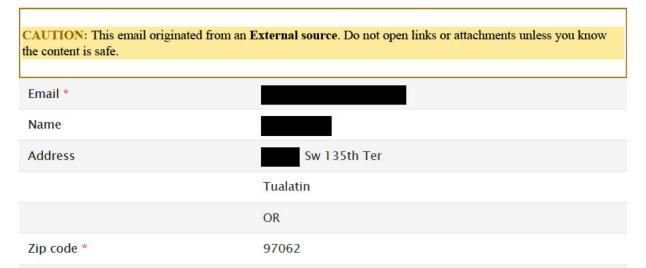
From:	Wufoo
To:	<u>SWICC</u>
Subject:	[External sender]Comment on Grimm's Fuel Company, Inc. 2024 [#15]
Date:	Monday, January 8, 2024 8:59:39 AM



From:	Wufoo
To:	<u>SWICC</u>
Subject:	[External sender]Comment on Grimm's Fuel Company, Inc. 2024 [#16]
Date:	Monday, January 8, 2024 9:19:14 AM

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Email *	
Name	
Address	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? *	The required oxygen monitoring daily NEEDS to be continued. I have asthma and air quality is a medical necessity. Bio cover NEEDS to remain in place. This is so communities nearby Grimm's fuel can reside without constant stench and air quality compromises.

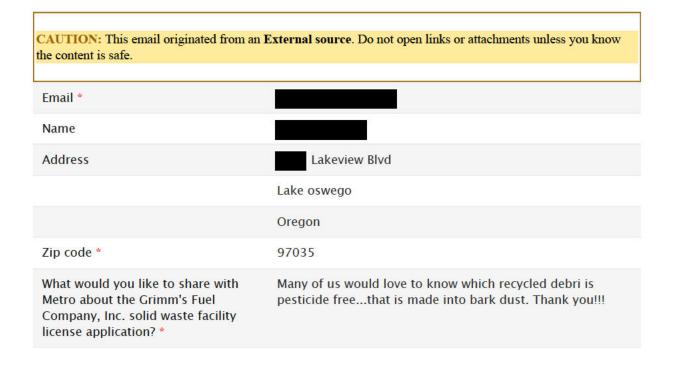
From:	Wufoo
To:	<u>SWICC</u>
Subject:	[External sender]Comment on Grimm's Fuel Company, Inc. 2024 [#17]
Date:	Monday, January 8, 2024 1:06:06 PM



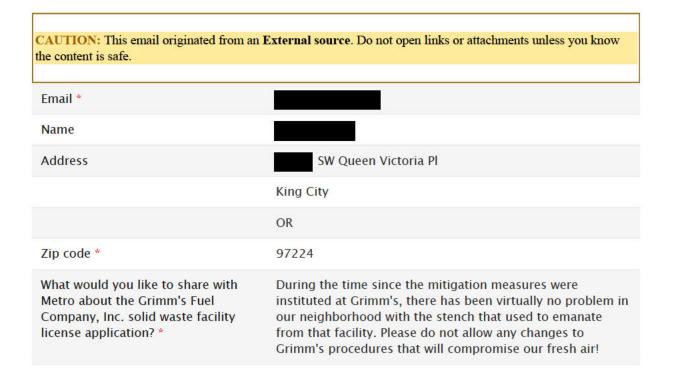
What would you like to share with Metro about the Grimm's Fuel Company, Inc. solid waste facility license application? *

We have been living in the pony ridge neighborhood since 2018 and own the home. Grimms should continue to operate as they currently do. To monitor oxygen daily and keep the 12in bio cover. We live on the far end of the street toward ute and can still smell grimms. Sometimes it's super pungent. We cannot imagine how bad the odor would be reducing these requirements and do not want to find out. We are constantly outside in our yards, and walking dogs like a lot of our neighbors. Having to constantly smell grimms will negatively impact our neighborhood. That's why these requirements were put in place prior. I understand as a business this can get expensive, but its paramount to the local community

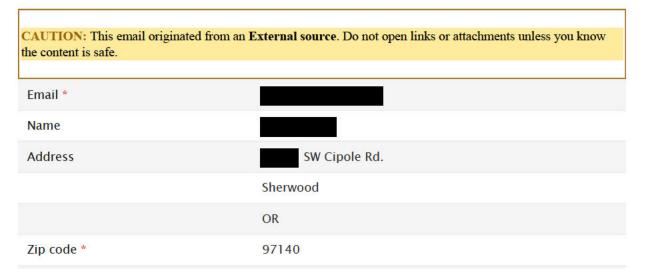
From:	Wufoo
To:	<u>SWICC</u>
Subject:	[External sender]Comment on Grimm's Fuel Company, Inc. 2024 [#18]
Date:	Tuesday, January 9, 2024 2:43:08 PM



From:	Wufoo
To:	<u>SWICC</u>
Subject:	[External sender]Comment on Grimm's Fuel Company, Inc. 2024 [#19]
Date:	Wednesday, January 10, 2024 5:33:07 PM



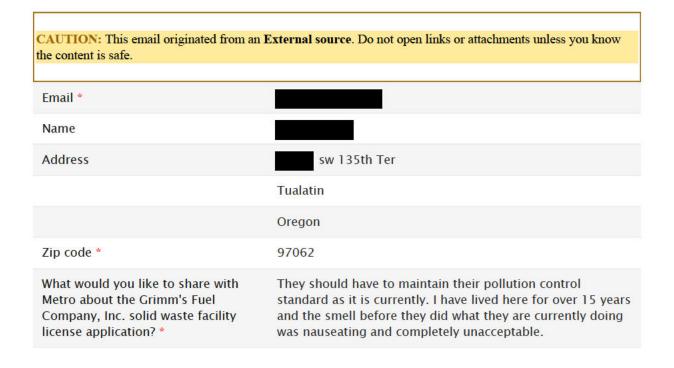
From:	Wufoo
To:	<u>SWICC</u>
Subject:	[External sender]Comment on Grimm's Fuel Company, Inc. 2024 [#20]
Date:	Friday, January 12, 2024 11:52:26 AM



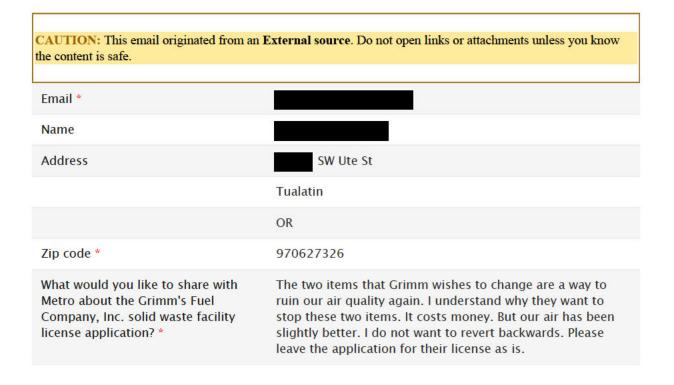
What would you like to share with Metro about the Grimm's Fuel Company, Inc. solid waste facility license application? *

Grimm's fuel established their essential composting portion of their business long before several homes were built closer to their location. Their business is absolutely essential to everyone in the Green Industry as well as so many homeowners. Taking debris and turning it into a sustainable product to enrich the soil is amazing and they need all of our support. My name is **series**, owner of All Oregon Nursery LLC and All Oregon Landscaping, Inc and their neighbor just south of their location on Cipole Rd.

From:	Wufoo
To:	SWICC
Subject:	[External sender]Comment on Grimm's Fuel Company, Inc. 2024 [#21]
Date:	Friday, January 12, 2024 4:24:24 PM



From:	Wufoo
To:	<u>SWICC</u>
Subject:	[External sender]Comment on Grimm's Fuel Company, Inc. 2024 [#22]
Date:	Saturday, January 13, 2024 4:36:00 AM

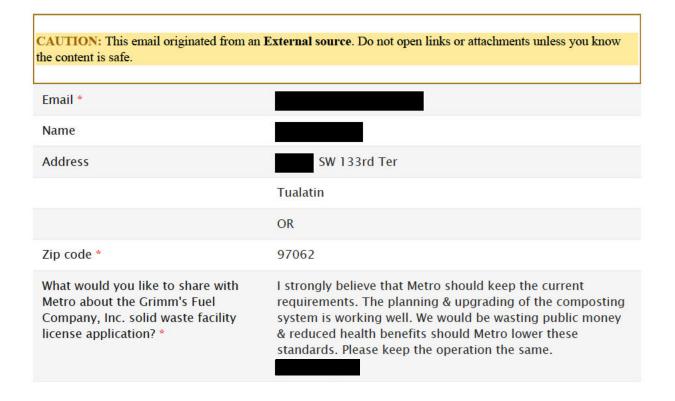


From:	Wufoo
To:	SWICC
Subject:	[External sender]Comment on Grimm's Fuel Company, Inc. 2024 [#23]
Date:	Sunday, January 14, 2024 4:28:44 PM

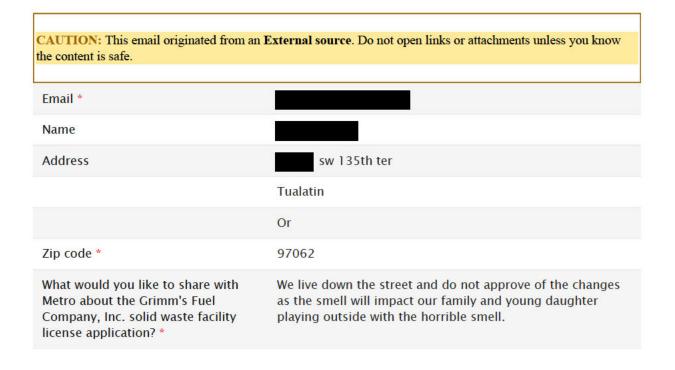
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Email *	
	Sherwood
	Oregon
Zip code *	97140
What would you like to share with Metro about the Grimm's Fuel Company, Inc. solid waste facility license application? *	Grimm's provides an essential service and is strategically located between housing areas and multiple nurseries/landscape companies. The cost of dumping is exorbitant and hopefully the requests made will allow for prices to remain stable. Grimm's has truly minimized all odors. They have responsibly adapted advanced composting methods and their request to adjust procedure and monitoring should be allowed.

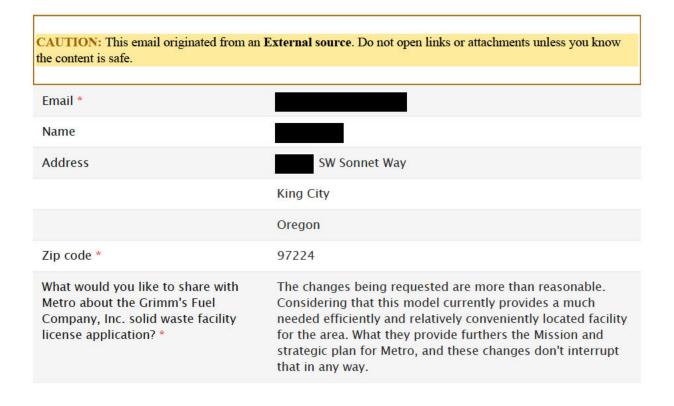
From:	Wufoo
To:	<u>SWICC</u>
Subject:	[External sender]Comment on Grimm's Fuel Company, Inc. 2024 [#24]
Date:	Thursday, January 18, 2024 12:17:59 PM



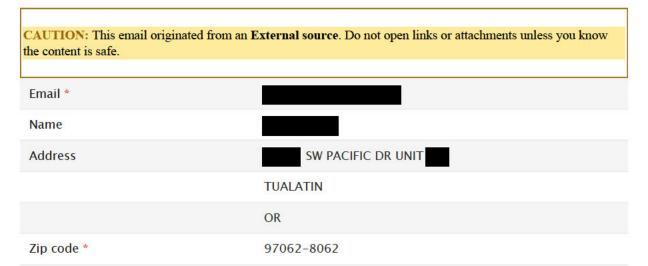
From:	Wufoo
To:	<u>SWICC</u>
Subject:	[External sender]Comment on Grimm's Fuel Company, Inc. 2024 [#25]
Date:	Saturday, January 20, 2024 3:52:09 PM



From:	Wufoo
To:	<u>SWICC</u>
Subject:	[External sender]Comment on Grimm's Fuel Company, Inc. 2024 [#26]
Date:	Monday, January 22, 2024 8:29:00 PM



From:	Wufoo
To:	<u>SWICC</u>
Subject:	[External sender]Comment on Grimm's Fuel Company, Inc. 2024 [#27]
Date:	Tuesday, January 23, 2024 12:35:33 PM



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

We had to put up with that awful smell for a long time before we finally got them to change how they composite. The smell made us sick. Grimm's was not very cooperative to lesson the smell as they did not want to invest money into the project. The reason Jeff gave for one change to the way they want to change the way they do things is to cut down on their personal having to measure the emissions every day as their workers get wet having to go out in the rain to do it. That is their job. No changes as we do not want to have that smell again. We can still smell Grimm's at times and it is not pleasant. Their pile gets as high as the output pipe at times too. They are not good neighbors. Thank you.

From:	Wufoo
To:	<u>SWICC</u>
Subject:	[External sender]Comment on Grimm's Fuel Company, Inc. 2024 [#28]
Date:	Sunday, January 28, 2024 7:48:41 AM

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Email *	
Name	
Address	Angel Haven
Zip code *	97062

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

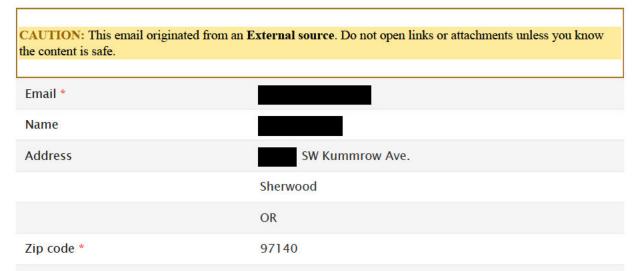
I would like to express my support for Grimm's Fuel and the proposed changes to their composting permit. They are valuable members of our community and they have always been good neighbors. I live in the Angel Haven community, and it has been a long time since we have smelled any compost odors in our neighborhood.

Many years ago, they had odor issues and Grimm's spent millions of dollars to correct the problem. If Grimm's and Green Mountain believe that reducing the number of oxygen readings and the amount of compost cover will not affect their odors, then I am in favor of the changes. They are the composting experts and I'm sure that their opinions on this matter are well thought out and backed up by studies and research.

I believe that Grimm's wouldn't do anything to make odors worse. They have a long record of being proactive and sensitive to our concerns. Odors are bad for their business and if it turns out that these changes do increase odors then they can simply go back to the existing requirements. I have read a lot of false claims and lies on social media about their proposed changes and it's just not fair. The second seco

Finally, why is this even an issue and why do we have to go through this every few years? What is it about this business that requires so much scrutiny? If they aren't creating a problem, then they should be left alone and allowed to conduct their business as they see fit. I don't recall being asked to comment on the operation of the restaurant up the road, or the plating company across the highway or the seamstress running a business out of a garage in a residential area. Metro should give Grimm's a 10 – 15-year license and put a stop to this public comment nonsense. Why should the public have a say in the operation of this business? Thanks for the opportunity to comment.

From:	Wufoo
To:	<u>SWICC</u>
Subject:	[External sender]Comment on Grimm's Fuel Company, Inc. 2024 [#29]
Date:	Sunday, January 28, 2024 4:10:51 PM



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

RE: Grimm's Fuel Company Metro Solid Waste Facility License

From:

SW Kummrow Ave., Sherwood OR 97140 NE Glisan, Portland, Or 97232

and

We are writing to object to Metro's proposed license renewal for Grimm's Fuel Company. Metro needs to leave environmental regulation to DEQ's permitting process and take environmental requirements out of their licenses. Current progress in pollution reduction at Grimm's should not be jeopardized based on unproven assumptions, and DEQ needs to scientifically access the situation before preparing the new permits for the facility.

Our family home is at SW Kummrow Ave., Sherwood Or 97140. Our property begins about a half mile from Grimm's Fuel Company and our home is about a mile away. We remember the property where Grimm's is now located, when it was a stream surrounded by trees. Over the years, as wood recycling filled in the area, replacing the stream and trees, we experienced smoke from uncontrolled fires in the debris piles and smells, particularly a frequent strong sweet smell, dirt, and endless truck traffic on 99W and Cipole Road.

Much has improved in the operation. The road dirt and truck traffic is gone, fires have been controlled, and smells have been greatly reduced. Progress! We still wonder about ground water contamination, and wonder what happened to that stream?

At the beginning of the year we received a Metro Public notice and chance to comment on the renewal of Grimm's Fuel Company Solid Waste License with proposed changes. Our notice was a reopened comment period, in response to public feedback that the first notice did not reach a broad enough audience. That was correct. We are impacted. The postcard directed us to the Metro website,

where we could review the Public Information Webinar meeting on the facility, the proposed license changes, and other documents. Previous public comments and complaints were not listed. No telephone number for further questions was included on the card or at the website.

Please review the Public Information Webinar meeting! It was shockingly information free.

Our later phone attempts to speak to someone at Metro about the license renewal was met only with a suggestion that we write to our Metro councilor, because "they are the ones authorized to speak to the public". So we are writing... and commenting.

Having past involvement with DEQ's Solid Waste and Air Quality Advisory Committees, we are familiar with DEQ's regulatory responsibility. We are astounded that Metro is duplicating DEQ's regulatory role. Further, based on the Public Information Webinar recording, Metro is not competent to waste taxpayer money involving itself in environmental regulation.

The Metro solid waste representative on the Webinar, while earnest and personable, could not answer any technical questions posed by the public. Could not cite any studies supporting the proposed reductions, could not even say how many complaints had been submitted to Metro. He said that the proposed reductions were based on informal, unsanctioned experiments done by their consultant, Green Mountain and Grimm's last summer. He commented that DEQ was not informed or involved in those experiments. He could not cite peer reviewed studies supporting the reductions.

Metro's online form for submitting complaints was discussed. The Metro solid waste representative acknowledged that the online form does not work reliably. He could not provide the questioners with any information about how many complaints had been received. Nor could he say what, if any, followup had been done with complaints, or would be in the future.

Shouldn't all complaints have been directed to DEQ's website? Shouldn't pollution control specifics be left to the DEQ permit? Instead, it appears that Metro has created a make-work black hole to bury complaints and questions about their decisions, and play at being regulators. Why are our tax dollars going to duplicative activities with ill-suited staff?

We support Metro's waste reduction and recycling goals, but see this as a failure to partner with other agencies and an example of ineffective and inefficient administration of our tax dollars.

cc: Via Email

Metro Council DEQ Solid Waste Division Governor Kotek

From:	Wufoo
To:	<u>SWICC</u>
Subject:	[External sender]Comment on Grimm's Fuel Company, Inc. 2024 [#30]
Date:	Sunday, January 28, 2024 7:13:08 PM

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Email *	
Name	
Address	SW 113th Ave
	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? *

Dear Metro:

We have been impacted by the composting operation at Grimm's Fuel for many many yrs 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. I leave in Tualatin by Hazelbrook MS & the smell is awful, even though we are 1.3 miles away. 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

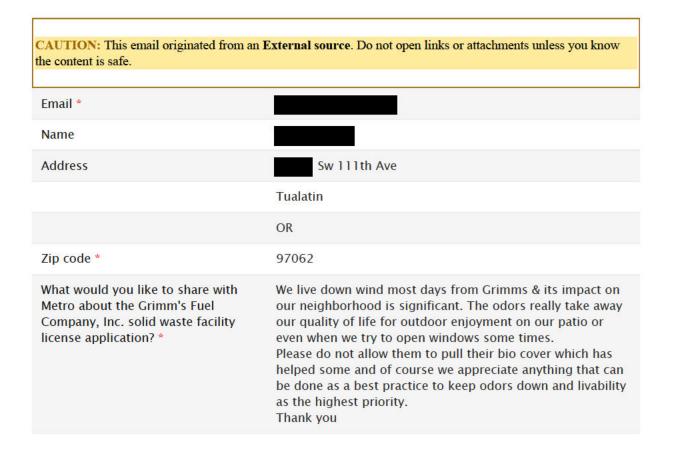
technical difficulties with an odor reporting form that does not always work, combined with the disclaimers, technical hurdles, and warnings that Metro staff has added to this form, each of which would result in a decrease in the number of complaints submitted.

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. All the reasons Mr. Grimm listed for his desired changes are completely not taking into consideration the thousands of people living and working around the facility. He considers the few extra \$\$s he is going to make more important than our health and well being

Thank you for your consideration.

From:	Wufoo
To:	<u>SWICC</u>
Subject:	[External sender]Comment on Grimm's Fuel Company, Inc. 2024 [#31]
Date:	Monday, January 29, 2024 8:22:27 AM



From:	Wufoo
To:	<u>SWICC</u>
Subject:	[External sender]Comment on Grimm's Fuel Company, Inc. 2024 [#32]
Date:	Monday, January 29, 2024 8:49:03 PM

CAUTION: This email originated from an External source . Do not open links or attachments unless you know the content is safe.		
Email *		
Name		
Address	SW 115th Avenue	
	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:

We are impacted by the composting operation at Grimm's Fuel and we insist that Metro maintain & abide by 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 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 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.

It also is unacceptable that the Grimm's have not been using the cover as Metro recorded during their July 18, 2022 inspection. That just happens to be the one time they were caught, it's concerning how often that could actually be occurring. That safeguard was put into place to protect neighbors & increase our quality of life. There is no excuse for violating these terms & for loosening this restriction. I would also implore Metro to do more inspections to ensure they are in compliance.

From:	Wufoo
To:	<u>SWICC</u>
Subject:	[External sender]Comment on Grimm's Fuel Company, Inc. 2024 [#33]
Date:	Tuesday, January 30, 2024 8:40:47 AM

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Email *		
Name		
	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? *

There appears to be no change in the attitude of Metro or nearby residents for the composting upgrades by Grimm's Fuel Company.

After an investment of millions of dollars, as well as a contribution from Metro, there is still no public acknowledgement from Metro, Oregon DEQ, City of Tualatin, Tualatin CIOs or citizen watchdog groups. No "Thank You to Grimm's" or "Congratulations" for their investment and commitment to continue to offer the composting service to the Metro area. Metro has posted no new pictures of the aerobic process, the equipment or composting zones. Metro is stuck in 2018. There are no "then and now" reports from the news media.

Search for 'grimms' on the OregonMetro.gov website and you are presented with a 2018 picture and after two links regarding the current license renewal, links 4,5 & 6 are links to 2018 "putrid smell" articles (1/9/24). Metro, it's time to move forward.

Also stuck in 2018 are a small number of individuals who continue to attempt to restrict operations or try to force closure of all composting operations. It's a tragedy that Metro gives any consideration to this handful of individuals versus the hundreds of small business landscapers who depend on this local yard debris acceptance location.

In 2019 and now, the Tualatin City Council has sent comments to Metro regarding license renewal without asking Grimm's for comment or information. Recently the Tualatin Commercial CIO had an agenda item/presentation regarding license renewal without extending an offer for Grimm's to attend or comment.

It is amazing that Grimm's continues operations against this headwind of regulators and citizen groups who will not acknowledge the changes from modernization.

The upgrade investment has resulted in a dramatic decrease in offsite odors and any remaining

odors are best characterized by the smell of dirt or earth. Don't believe me? Visit Grimm's.

In 1974 Grimm's moved to the furthest limits of the Urban Growth Boundary, near a dairy and Onion Flats. They started composting in 1982 using the large pile composting method. While it takes a bit longer, it creates wonderful compost. It did create some odors, but manageable at the levels of material dropped off, and after all, they were in an agricultural/industrial area.

Odors were not a problem in this location until the mid-90s when the City of Tualatin approved residential developments across Hwy 99, directly in the path of the prevailing southerly wind across the Grimm's property.

Additionally, urban growth boundary extensions and increased regulations resulted in the closure of other local yard debris composters which brought more and more material to the Grimm's facility. The large pile static composting grew to be a problem as Grimm's is the last remaining local facility to accept yard debris. The next closest facility is in Banks or Milwaukie.

Grimm's could not visualize how to upgrade the facility while remaining open to accept the yard debris from the hundreds of small landscapers and local citizens. Green Mountain Technologies (GMT) laid out a blueprint to modernize the facility and Grimm's has been very clear to acknowledge Metro's part in contracting with them.

The pile turning event in February 2018 was not Grimm's choice but scheduled by Metro in adverse conditions. We all know the result of turning the large pile in inversion conditions. Apparently and unfortunately, it seems the memory of that event is the only lasting impression in the minds of the regulators, City of Tualatin, local citizen groups and the news media.

Grimm's is not the "robber baron" as portrayed by those who want it closed or further restricted. A search of the internet will bring up the progression of laws that required diversion from landfills and encouraged composting of green waste. My comments continue after this short quoted section: "A shortage of landfill space encouraged the Oregon legislature to pass the Opportunity to Recycle Act in 1983. The law established solid waste management policies that recognized the environmental benefits of waste prevention, reuse and recycling. The law also required wastesheds to have recycling depots and cities with populations over 4,000 to provide monthly curbside recycling collection service to all garbage service customers."

"The 1991 Oregon Recycling Act (SB 66) strengthened and broadened recycling requirements and added activities to develop markets for recyclable materials. SB 66 set a statewide recovery goal of 50 percent by 2000 and required that DEQ conduct regular waste composition studies and develop a solid waste management plan. SB 66 also created the first eight recycling program elements. The 1997 Oregon Legislature made changes to some of those elements and added a ninth."

"Also in 1997, a coalition of experts developed a strategy to move Oregon's resource recovery efforts beyond recycling. A resulting program offered local governments a two percent recovery rate credit for establishing and maintaining programs in waste prevention, reuse and backyard composting."

Transition to materials management

"In 2011, DEQ convened a workgroup to help develop a long-term vision and framework for responsible materials management in Oregon. The Oregon Environmental Quality Commission adopted the resulting Materials Management in Oregon: 2050 Vision and Framework for Action (2050 Vision). The 2050 Vision is also Oregon's State Integrated Resource and Solid Waste Management Plan. The 2050 Vision guides statewide policy for managing materials throughout their full life cycles, including recovery, reduction, reuse, and recycling." "In June 2015, the Oregon Legislature passed Senate Bill (SB 263). SB 263 better enables DEQ, local governments, and Oregonians to make progress under the 2050 Vision. Among other things, SB 263:

Raised statewide recovery rates;

• Set statewide material-specific recovery rates for food waste, plastic waste, and carpet waste;

• Made wastesheds' self-determined recovery goals voluntary to give local governments more flexibility;

• Increased to thirteen the number of recycling program elements available to local governments (effective Jan. 1, 2018, per rule);

• Amended the expanded education and promotion program element to include a contamination reduction education aspect (effective Jan. 1, 2018, per rule);

• Increased minimum numbers of recycling program elements required for certain cities based on their population sizes and distances from Portland (effective Jan. 1, 2018, per rule);

• Added seven waste prevention education and reuse program elements, requiring minimums ranging from three to five elements depending on cities' populations or location within Metro (effective Jan. 1, 2018, per rule);

• Allows a local government using a DEQ-approved alternative program the flexibility of meeting either the lesser of its recovery goal or recovery levels comparable to similar communities (effective Jan. 1, 2018, per rule);

• Expands statewide the opportunity to recycle to residential and commercial tenants of multitenant properties with collection service (effective July 1, 2022, per statute); and

• Permits DEQ to develop outcome-based recovery goals to measure recovery using methods besides materials' weight, such as energy savings.

• Revenue to fund DEQ expenses directly related to the proposed rules was anticipated during the development of Senate Bill 245 (SB 245), which allowed for increases in tipping fees. The legislature also passed SB 245 in June 2015 as a companion to SB 263."

GMT over-designed the composting system to protect their reputation and provide a positive result for Metro. They designed the system at Grimm's with their prototype air handling system to guarantee maximum effect by the new process. They also included a backup plan, an excessive level of bio-cover over the composting zones, to make sure the maximum reduction of composting odors. Grimm's was the first facility to receive their prototype "H-Damper" air handler system and the 4 air handlers have outperformed expectations. The results have been dramatic.

At the time of licensing in 2019, Grimm's presented Metro article after article concerning "best practices" for requirements and the use of bio-cover on various methods of composting. Metro rejected all industry practice and evidence to impose a 12" requirement of bio-cover for political reasons.

None of the other remaining composters in the Metro area have license restrictions and requirements anything like those imposed on Grimm's. The license requirements on Grimm's is clear government overreach.

Metro, it is time to update your thinking to 2023. Acknowledge the improvements in technology and allow Grimm's license modification request.

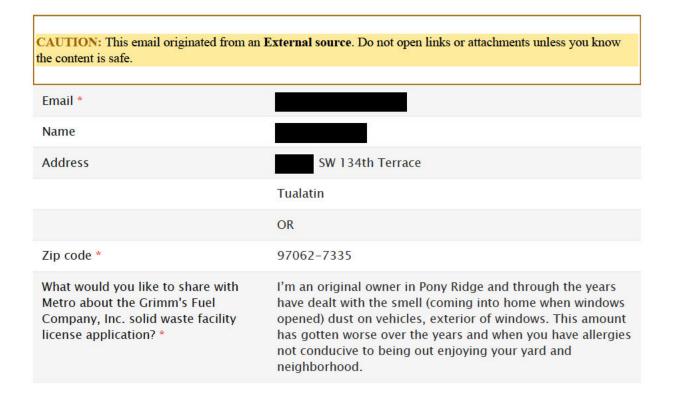
The barrier to entry into the composting business is very high. What legitimate investor would commit millions to a new facility with license conditions that can be modified or revoked at will? What investor would commit millions on a non-exclusive basis with no recourse on the issuing agency, holding the agency harmless from any and all loss, damage, claim or expense with term of only 5 years?

When will Metro extend the license period to a longer time period? 10 years? 15 years? I can imagine Metro might want to limit a new provider to a shorter period to be sure they can perform but the Grimm's have been in the composting business for 42 years.

With the lack of appreciation from Metro and the ever-increasing regulation, in my opinion, the best option for Grimm's Fuel Company is to cease operations, contract with Trammel-Crow to fill their property with concrete tilt-up buildings, then sit home and collect rents. Who in their right mind would try to prevail against this ever increasing and arbitrary regulation?

TOO BAD for the hundreds of small vulnerable landscapers trying to make a living. TOO BAD for the local citizens maintaining their yards and neighborhoods. TOO BAD for Oregon Metro who likes to boast of the levels of material diversion from landfills.

From:	Wufoo	
To:	SWICC	
Subject:	[External sender]Comment on Grimm's Fuel Company, Inc. 2024 [#34]	
Date:	Tuesday, January 30, 2024 12:34:42 PM	



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From:	Wufoo	
To:	<u>SWICC</u>	
Subject:	[External sender]Comment on Grimm's Fuel Company, Inc. 2024 [#35]	
Date:	Tuesday, January 30, 2024 8:28:17 PM	

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Email *		
Zip code *	97062	
What would you like to share with Metro about the Grimm's Fuel Company, Inc. solid waste facility license application? *	Send test.	

From:	Wufoo	
To:	SWICC	
Subject:	[External sender]Comment on Grimm's Fuel Company, Inc. 2024 [#36	
Date:	Tuesday, January 30, 2024 8:57:26 PM	

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97062

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

Your website was unable to take my first submission, it did not work. Please let your IT people know... I spent an hour composing a response on this platform, but you won't ever see it because when I hit the submit button nothing happened... now I am going to try again.

I received a notice from metro about the Grimm's Fuel application. Do not approve these changes. Watched your Dec. 2023 Webinar. I live across the highway from this facility. The smells are awful when they happen. It smells like some sort of combustible gas is in the air, and is especially potent on some of the hottest days of the summer. No one is testing these odors to see if they are toxic or contain harmful fumes. While the current request is narrow, it appears to be two parameters, depth of soil coverage and daily oxygen testing levels. These should remain in place, the odors still occur and need to be eliminated.

Relying on the operator of the business to self regulate never works* he (Jeff Grimm) could not even "quantify" the benefits to his own business or the community as a result of the requested changes...

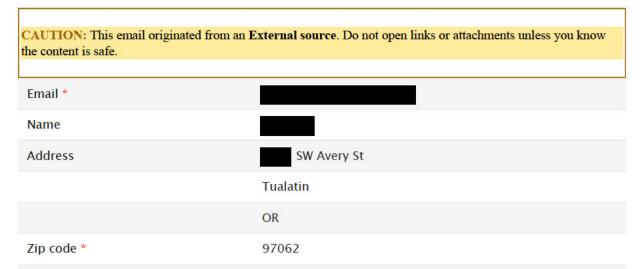
Please help the residents of Pony Ridge, Cedar Ridge Alzheimer's Care, Angel Haven, and Riverwood Senior facility find ways to breathe as clean as possible air

Thank you.

*Reference LA Times article "A Fire Burning Deep Inside An L.A. County Landfill is Raising New Alarms Over Toxic Air" January 30, 2024 by Tony Briscoe.

Than you.

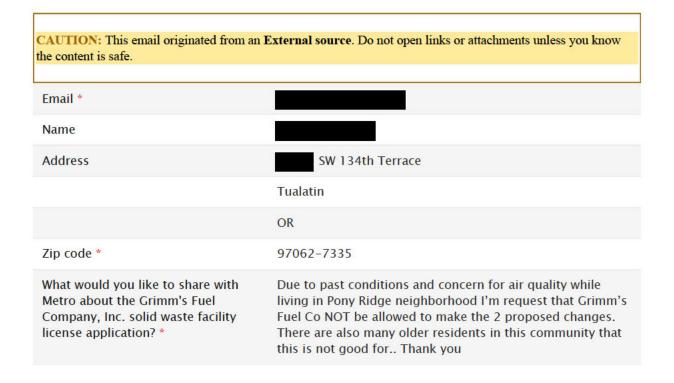
From:	Wufoo
To:	SWICC
Subject:	[External sender]Comment on Grimm's Fuel Company, Inc. 2024 [#37]
Date:	Tuesday, January 30, 2024 11:08:43 PM



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

Grimms has been a valued part of Tualatin, and all of Washington Co. for decades. They have always been considerate operators. To single their operations out when many industries in the area are allowed to pollute odors (Pacific Foods), noise (Falcon), traffic (all manner of truck traffic) is simply not consistent treatment. The activist homeowner group is composed of relative new comers to the city who want some utopian version. We have been taking yard debris and purchasing materials from Grimms for two generations and sure there are odors occasionally, but heck the dog food factory was 100 times worse. The wetland on Teton north of Tualatin Sherwood Rd. stinks to high heaven at times, are you enforcing similar requirements in natural areas? Grimms composting of all our debris is no different than a natural, occasional happenstance. Where will this stop? Are we going to micro manage every business when development gets too tight and close with many businesses? The micro management of Grimms borders on big brother overreach that we, as customers, will all pay for in the end. We request approval of Grimms new plan as submitted. Jim and Karen Muir (our family has been in the same house since 1956

From:	Wufoo
To:	<u>SWICC</u>
Subject:	[External sender]Comment on Grimm's Fuel Company, Inc. 2024 [#38]
Date:	Wednesday, January 31, 2024 10:06:41 AM



From:	Cisco Unity Connection Messaging System	
То:	MRC Public Comment Line	
Subject:	Message from WIRELESS CALL	
Date:	Wednesday, January 31, 2024 10:36:47 AM	
Attachments:	VoiceMessage.wav	

Audio file 20240131 voice message from WIRELESS CALL (

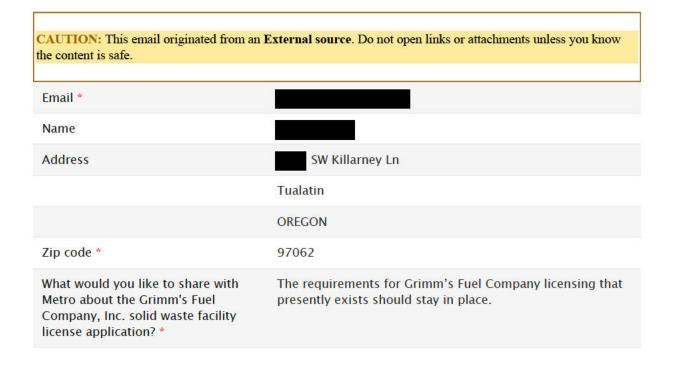
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Received January 31, 2024 at 10:36 am

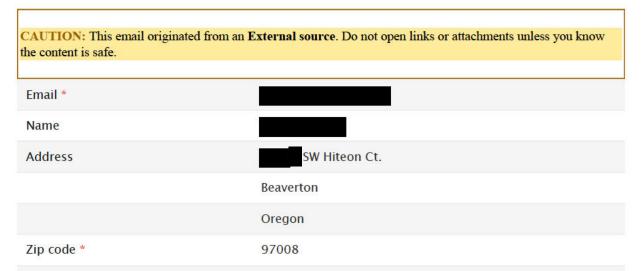
Transcript

. I am calling in regards to Grimm's Fuel Company. It's my Hi, my name is understanding that they are looking to renew or adjust the standards that they have for the bio cover. It's currently 12 inches and they're seeking to lower that to 4 to 6 inches. I had the opportunity to go and walk and tour the full facility at Grimm's with Jeff who showed me, you know, all of the inner workings and discussed in in detail with me December 27th of 2023 and how what was proposed you know would affect their business on things. I am over in Lake Oswego, but I'm very much aware of the stench that can come off of the pile and Grimm's and granted there are other smells that come around, not just Grimm's. With the increase of the debris that is coming into their facility, it is concerning that we would have a backlash of what had been previously too smelly and really disruptive to people's lives and and air quality around their facility. He did say that they were not seeking to take on new forms of composting, but didn't say that they wouldn't either. So I'm opposed to lessening the 12 inches of bio cover that it is now. I know that they had done a trial run, and got some backlash about that and it didn't go well. It was smelly and I could smell it over in my neighborhood. I can't imagine what the neighbors closest to Grimms are going through. And and I'd heard it mentioned that, you know, that Grimm's had been here for so long, and I don't know that that is the argument to take when it comes to the air quality of entire neighborhoods and communities around us. Granted, that may have to do with the increase of product that they're bringing in, which is growing their business. Think it's a great business. My my dad over generations, you know, had Grimm's. I appreciate what they do. But I do have concerns about lowering that cover. The biofilm cover cover anyway. Again, my name is . My number is . If anyone needs reach me has any questions, please feel free to contact me. Have a good day. Bye bye.

From:	Wufoo
To:	<u>SWICC</u>
Subject:	[External sender]Comment on Grimm's Fuel Company, Inc. 2024 [#39]
Date:	Wednesday, January 31, 2024 11:26:08 AM



From:	Wufoo	
To:	<u>SWICC</u>	
Subject:	[External sender]Comment on Grimm's Fuel Company, Inc. 2024 [#40]	
Date:	Wednesday, January 31, 2024 12:02:35 PM	



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

When we first moved to our current home in Beaverton in 2017 there was a terrible acrid smell outside which came mostly during cold weather mornings. It smelled caustic and unhealthy and I worried our family was being exposed to a dangerous air pollutant. Several neighbors said it was a treatment facility, but there are none nearby. Turns out it was Grimm's. The smell dissipated after a year or two and I've been so grateful...and now I know why! Thank you for requiring new aeration and bio-covers...they worked! It has made a difference for our kids with asthma and for the nonhealth-related livability in the area.. Please do not allow ambiguous language regarding the use of bio filters so phrases leave room for expanded reach of that awful air pollution again...please require the continued use of whatever has been required in the recent past (because it is working!), or if Grimm's is allowed to removed the bio-covers or reduce their thickness they must continue to test daily and prove their lesser covers maintain levels of pollution that are the same as or lesser than what has been accomplished over the last several years. Please avoid ambiguous language; it only makes it more difficult to prove compliance or enforce if the smell becomes problematic again, which is not good for Grimm's but is even worse for the community. So if this new method Grimm's is asking to use does not work, it needs to have quick turn-around (lease state actual number of days or hours within which they must reach compliance) and be required again to provide the full 12in thick bio covers. Thank you for your consideration. Our family thanks you!

From:	Wufoo	
To:	<u>SWICC</u>	
Subject:	[External sender]Comment on Grimm's Fuel Company, Inc. 2024 [#41]	
Date:	Wednesday, January 31, 2024 3:59:45 PM	

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

I live very close to Grimm's and walk through the neighborhood daily. Since Monday, January 22nd through at least Monday, January 29th there was a distinctly bad odor coming into the neighborhood everyday. Yesterday was the first day in over a week that I did not smell the bad odor. One wonders if the 12 inch bio-cover requirement on the license has been followed. If it has been, Metro needs to consider increasing the requirement to 15 inches. If it has not been followed, Metro needs to issue Grimm's a financial penalty rather than send them warning letters. Thank you

From:	Wufoo
To:	<u>SWICC</u>
Subject:	[External sender]Comment on Grimm's Fuel Company, Inc. 2024 [#42]
Date:	Wednesday, January 31, 2024 4:15:36 PM

Email *	
Name	
Address	SW Willow St Tualatin 97062
Address	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? *	Please DO NOT allow owner to proceed with replacing the current bio-cover mandate imposed by Metro until they find a much better method for composting, that does not affect the physical/mental health and daily qualities of life of those within the vicinity, and those who pass by daily along highway 99. Current and new residential and commercial businesses near Grimm's Fuel and Recycling should not have to fight for clean breathable air constantly. It must be protected!

From:	Wufoo
To:	SWICC
Subject:	[External sender]Comment on Grimm's Fuel Company, Inc. 2024 [#43]
Date:	Wednesday, January 31, 2024 4:45:07 PM

