



# Oregon

Kate Brown, Governor

## Department of Environmental Quality

Northwest Region

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Via email: jefgfc@teleport.com

May 4, 2018

Grimm's Fuel Company  
Jeff Grimm  
18850 SW Cipole Road  
Tualatin, OR 97062

Dear Mr. Grimm:

Thank you for meeting with DEQ and Metro at Grimm's yesterday. I wanted to summarize topics that we discussed during the site visit. Several of the items will require action from Grimm's and are noted in bold.

- 1) DEQ will be initiating a permit modification to include the 25-foot maximum pile height fire code requirement as a condition of the permit. DEQ considers this to be a substantive modification to the permit and will initiate a public notice to receive comments on the proposed modification. Grimm's will need to submit updated operations and odor minimization plans as well as facility design and construction plans to meet the pile height reductions. Before Grimm's updates these plans, DEQ requests that Grimm's work closely with DEQ, Metro and Metro's consultant to determine the best approach for completing the pile height reduction while minimizing offsite odors and impacts to neighbors.
- 2) The March 13, 2018 Pre-Enforcement Notice (PEN) from DEQ requested Grimm's to make facility improvements to prevent the potential discharge of leachate to the stormwater system and to update the Operations Plan accordingly by April 15, 2018. The March 15, 2018 PEN response letter from your consultant, Roger Smith Associates, states that the leachate overflow pipe has been capped and an updated Operations Plan will be submitted to DEQ for review by April 15, 2018. DEQ did not receive an updated plan by April 15, 2018. On May 3, 2018 during a site visit, DEQ observed that the overflow has not been capped and the system still allows for overflow of the leachate system into the stormwater system. **By no later than May 15, 2018, please complete facility improvements and provide documentation to DEQ that the overflow has been capped and provide a revised operations plan describing these changes for DEQ's review and approval.** DEQ has referred the violations identified in the PEN to DEQ's Office of Compliance and Enforcement. Grimm's response to the PEN will be taken into account as the Office of Compliance and Enforcement proceeds with enforcement evaluation.
- 3) In the July 2017 Operations Plan that DEQ approved, Grimm's changed the minimum Oxygen operating parameter from 5% to 0.5%. DEQ did not realize that this parameter

range was changed. DEQ is withdrawing approval of the minimum oxygen content in section 6.1(d) page 10 of the July 2017 Operations Plan. An oxygen range of 0.5% to 20% is not adequate to assure proper aerobic composting. Grimm's must modify the operations plan to identify a minimum oxygen operating value of 5%. This was the value previously identified in the Operations Plan dated January 2016. **Please provide a revised Operations Plan updating section 6.1(d) to reflect an oxygen range of 5% to 20% for DEQ review and approval by May 15, 2018.**

- 4) Based on recent detection of offsite odors and evaluation of Grimm's work practices, Grimm's must further revise the Operation Plan and Odor Minimization Plan to increase actions to reduce offsite odor impacts. DEQ is available to meet with Grimm's to discuss additional actions that Grimm's can take to further reduce offsite odor impacts.

Please let me know if you have any questions. I can be reached at 503-229-5590 or by email at [fleming.jeremy@deq.state.or.us](mailto:fleming.jeremy@deq.state.or.us). DEQ looks forward to working with you on these issues.

Sincerely,



Jeremy Fleming  
Solid Waste Compliance Specialist

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