

1. Why is Grimm's allowed to accept so much stuff and have such a huge pile? It never used to stink this bad, what has changed?

- **TVF&R:** On May 2, 2018, TVF&R issued a correction notice requiring Grimm's to reduce the pile size (25' height; 150' width; 250' length) in two phases. The correction order requires Grimm's:
 - Reduce pile height to 40' by December 31, 2018; and
 - Reduce pile to 25' in height, 150' in width and 250' in length by May 1, 2019.
- **Metro:** Grimm's static pile method of composting can result in pockets of anaerobic conditions (lack of oxygen) due to compression. For over 35 years Grimm's have utilized this composting method and during that time the volume of yard debris and pile size has increased. Metro hired a composting consultant (Green Mountain Technologies) to make recommendations for effective operational improvements focusing on odor mitigation. Metro supports the Fire Department pile height restrictions
- **DEQ:** DEQ's rules do not limit incoming feedstocks or dictate the type of composting that is allowed. DEQ's rules require that a compost facility meet performance standards in OAR 340-096-0070(4) which requires, in part, that "All composting facilities must be ... operated in a manner that, to the greatest extent practicable ... controls and minimizes odors that are likely to cause adverse impacts outside the boundaries of the facility." In 2014, DEQ issued a compost permit to Grimm's that included a 30' pile height restriction. Grimm's contested the permit and in response, DEQ revised the permit to instead require an updated odor minimization plan and monitoring of compost parameters to verify minimization of anaerobic conditions. DEQ supports the Fire Department pile height restrictions and will modify the DEQ permit to include these requirements.

2. Why is Grimm's allowed to have a commercial compost operation so close to a residential area and what can be done about traffic congestion, as both a nuisance and safety hazard?

- **City of Tualatin:** Grimm's is located in a Heavy Manufacturing zone which is considered the heaviest manufacturing zone. Grimm's was an existing resource and recovery use beginning in the 1970s. The residential areas had homes there prior to being annexed and developed as a subdivision and a mobile home park. Over time the residential density increased and at the same time it appears that Grimm's operations intensified. Grimm's became part of the City before the subdivision, mobile homes, and apartments came into the City. The residential uses were allowed at the request of the developer of land and were approved by the City Council in the 1990s. Traffic concerns can best be addressed by ODOT regarding 99W and Washington County for Cipole Road.

3. What is being done about the odors and how long is it going to take to implement changes?

- **DEQ:** DEQ is requesting that Grimm's improve its operations plan to address odor concerns. DEQ supports the fire department height restriction and will modify Grimm's permit to add these requirements. DEQ intends to work with Metro and Metro's consultant to identify improvements that Grimm's can implement to minimize odors.
- **Metro:** Metro commissioned Green Mountain Technologies (GMT) to assess Grimm's operations and provide recommendations for process improvements to ensure improved odor mitigation. Metro will present GMT's report and findings at another public meeting in July. Additionally, Metro licenses require compliance with local requirements, including the Fire Department's pile reduction requirement.

4. *What are the potential risks of the site (fire, health, environmental, etc.)?*

- **TVF&R:** Wood chips, mulch and similar organic materials are combustible products, and in large quantities, the heat generated during microbial decomposition of the composting process can lead to spontaneous combustion within the piles. Typically, this results in smoldering within the piles. Spontaneous combustion can be reduced by following certain practices such as maintaining smaller pile sizes, frequent turn-over, aeration, and temperature monitoring. Wood chip and mulch piles also present "surface" fire hazards such as from smoking materials and sparks from equipment.
- **Washington County Health Department:** Odors do not always mean exposure to toxic amounts of chemicals. However, some people might be more sensitive to odors than others. When this happens, it can worsen quality of life. The most commonly reported odor-related symptoms are headache, dizziness, nausea, and light headedness. If you experience these symptoms, they do not necessarily mean that permanent damage is being done to the body. Odor-related symptoms typically go away when the odor goes away. Aside from odors, compost facilities can release into the air a wide range of things collectively called "bioaerosols." The mix of bioaerosols is different from facility to facility. Bioaerosols include things like fungi and fungal spores, bacteria, endotoxin (a structural component of the cell wall from some bacterial cells), dust that contains microbial components, and pieces of fungal cells. Many of the components of bioaerosols are normally occurring in the environment. Bioaerosols disperse and do not travel far from the composting facility. There are no standards or regulatory limits for odors or for bioaerosols in the U.S. There are also no research studies to tell us what level of exposure to bioaerosols can result in symptoms.
- **DEQ:** In the evaluation of Grimm's composting permit application, DEQ identified potential risks to surface water, ground water, and potential offsite odors. DEQ required that Grimm's obtain a full compost permit that includes an operations plan and odor minimization plan. After the February air quality inversion and DEQ's inspection, DEQ is requesting that Grimm's update its operations plan and odor minimization plan to identify additional measures to address odors and leachate. DEQ is working with Metro and TVFR to incorporate their requirements into Grimm's DEQ permit and operation plan. DEQ's air quality program is not requiring air quality permits for compost facilities at this time.
- **Metro:** Metro's authority is specific to the types of wastes (yard debris) that Grimm's accepts and how the wastes are managed. Metro relies on input from its government partners to assess and address other concerns outside of solid waste including but not limited to air and water quality, human health impacts, fire hazards, and land use allowances.

5. *When the odors make me sick or give me headaches, what should I do?*

- **Washington County Health Department:** Talk to a health care provider about your health concerns. Keeping a record of when your symptoms are worse and what things seem to affect your symptoms can help your health care provider with diagnosis and treatment. Opening windows and turning on fans at times when the outdoor odor is less strong and then closing doors and windows when the outdoor odor is strong may help in some situations. Another way to address strong odors is to turn off heating, ventilation or air conditioning (HVAC) systems because these systems draw air from the outdoors and into your home. Frequent cleaning and use of air filters may also help in some situations. Finally, actively reporting when the odor is strongest, where you smell it the most, how long it lasts, and a description of the odor could

help DEQ, Metro, and the facility identify which specific activities at the facility are causing odors so that measures can be taken to address them.

6. *What other methods of (commercial) composting are there?*

- **DEQ and Metro:** Other types of composting include:
 - Aerobic composting, usually in 8-15' piles, with air forced through them and regular turning to ensure complete composting.
 - Anaerobic digestion, a degradation process that breaks down organic material within large vessels under anaerobic conditions (lack of oxygen). Some anaerobic digesters can process yard wastes and some cannot. Oregon does not have any digesters that can accept residential yard waste.
 - Vermicomposting, a small scale process using various species of worms, usually red wigglers, to decompose vegetable or food waste. Vermicompost is a nutrient-rich organic fertilizer and soil conditioner used in small scale farming.

7. *Is Grimm's currently in violation of their licenses and/or permits and what are the odor requirements of their licenses and/or permits?*

- **DEQ:** DEQ identified violations at a February 2018 inspection and issued a pre-enforcement notice to Grimm's requiring corrective actions. Odor requirements are identified in rule and in Grimm's permit. DEQ's rules require that a compost facility meet performance standards in OAR 340-096-0070(4).
- **Metro:** Grimm's current Metro license addresses odors in two places, Section 5.8 and 6.7. Grimm's must operate in a manner that mitigates offsite odors, identify procedures to control and minimize offsite odors including monitoring, managing and mitigating odors, responding to and investigating odor complaints, and required to operate in compliance with its approved operating plan. At this time, Metro has not issued a violation. Metro is working closely with DEQ on its pre-enforcement action and has commissioned Green Mountain Technologies to perform an assessment of this site to inform future license conditions. Metro staff continues to investigate odor complaints and observe area conditions.

8. *How can residents and business owners be involved and does our feedback matter?*

- **DEQ:** DEQ will initiate a public comment period to obtain public input on the proposed changes when it drafts a permit modification. DEQ is available to meet with residents and business owners to discuss regulatory requirements for Grimm's.
- **Metro:** Metro welcomes public input and strives to be responsive to all comments received. Facility complaints are recorded and shared with the facility operator to identify operational issues that may be causing the complaints. Community input has been very important to inform Metro's decision-making process as it relates to Grimm's, and the value of this input cannot be overstated.

9. *What if Grimm's shuts down completely, where will all the yard debris go?*

- **DEQ and Metro:** There are other compost facilities authorized to receive yard debris in the Portland Metro area, but they may not be ready to accept a large volume of material that would be shifted in the event of Grimm's closure. Grimm's provides a valuable service of composting yard debris from the Portland Metro area. If Grimm's were to stop accepting the region's yard debris, materials would be diverted to existing facilities which may be located farther away and

could negatively impact landscape businesses, residents, government jurisdictions, and commercial haulers due to an increase in vehicle miles traveled. An increase in vehicle miles traveled has the potential to negatively impact regional air quality and possibly cause an increase in curbside collection rates across the region.

10. Is composting the highest and best use of that property and do grandfather considerations for facilities that are here first hold water when the facilities' practices negatively impacts its neighbors?

- **City of Tualatin:** The use is allowed in the Heavy Manufacturing zone. So long as the facility is operating a lawful use on the property, they have a legal right to do so. If a violation occurs, the City does not shut down businesses. Rather, the City seeks voluntary compliance, and if that does not work, the City has authority to fine or force compliance with the law.

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