



**City of Portland, Oregon**  
**Bureau of Development Services**  
**Land Use Services**


FROM CONCEPT TO CONSTRUCTION

Dan Saltzman, Commissioner  
Paul L. Scarlett, Director  
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November 22, 2011

**Memorandum**

TO: Portland City Council

FROM: Sheila Frugoli, Senior Planner, BDS Land Use Services 

RE: LU 10-194818 CU AD (Recology): Minor Revisions to Tentatively Adopted Conditions of Approval

You will note that the 18 tentatively adopted conditions of approval have been reorganized. The order of the conditions were changed in order to follow similar themes such as building permit requirements, operational limits and nuisance mitigation and code enforcement.

After your deliberations on October 5, 2011 for the Recology appeal, Commissioner Fritz's office contacted me and asked that two of the tentatively adopted conditions be revised to address her concerns. The changes to the conditions are minor, but add clarity for BDS code enforcement purposes. Below are the modified conditions. The bold text identifies the additional language that Commissioner Fritz has requested.

Condition N.

Recology (or any successor in interest) must document all nuisance complaints that are received, including but not limited to: litter, noise, odors, dust, traffic and vectors. For every nuisance complaint received, the facility will record, in a complaint log, the following information:

- The nature of the complaint; and
- The date and time the complaint was received; and
- The name, address and telephone number (if provided) of the person or persons making the complaint; and
- The Recology (or any successor in interest) employee who received the complaint; and
- Any actions taken by Recology (or any successor in interest) employee(s) to resolve the complaint.

A record of all complaints and action taken must be maintained at the facility for a minimum of one (1) year. Annually, **and upon request**, a copy of the complaint log must be delivered by mail to the Lents Neighborhood Association Chairperson (per Office of Neighborhood Involvement website information), the East Portland Neighborhood Office **and to the BDS Code Compliance Division**. Recology (or any successor in interest) will provide Department of Environmental Quality Solid Waste representatives, Metro Solid Waste

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representatives, and the Bureau of Development Services access to review the complaint log and other required logs, records and reports.

Condition Q

**Between the hours of 7 am and 10 pm, Recology (or any successor in interest) shall operate in compliance with the City's Noise Control Title 18.** Before Recology (or any successor in interest) may conduct the processing, sorting, grinding and cleaning operations during nighttime hours 10 pm to 7 am, they must submit to the City of Portland Noise Control Officer and the Bureau of Development Services Code Compliance Division, additional noise analysis from a licensed engineer demonstrating compliance with Title 18, **specifically pertaining to reduced sound levels applicable between 10 pm and 7 am. BDS verification of violations of Title 18 shall be subject to immediate issuance of Noise Citation civil penalties.**

The tentatively approved findings and conclusion before you, include these modified conditions.

cc: Karla Moore-Love, City Council Clerk  
Kathryn Beaumont, City Attorney



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October 31, 2011

***Memorandum***

TO: Portland City Council

FROM: Sheila Frugoli, Senior Planner, BDS Land Use Services

RE: LU 10-194818 CU AD (Recology): Need to Reschedule Final Adoption of Findings

Recology's attorney, Mr. Michael Robinson has not yet submitted the draft findings and conclusions that support the Council's tentative decision of approval. Prior to submittal, the findings must be reviewed and approved by the City Attorney. Mr. Robinson intends to submit the draft decision to me and Kathryn Beaumont later today.

Council Clerk Karla Moore-Love has rescheduled this item to November 16<sup>th</sup> at 10:00 am.

## Parsons, Susan

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**From:** Parsons, Susan  
**Sent:** Wednesday, August 10, 2011 1:38 PM  
**To:** Grumm, Matt; Ansary, Raihana; Schmanski, Sonia; Watters, Cary; Edwards, Kenneth; Adams, Sam; Commissioner Fish; Commissioner Fritz; Leonard, Randy; Saltzman, Dan  
**Cc:** Rees, Linly; McKinney, Susan; Esau, Rebecca; Moore-Love, Karla; Frugoli, Sheila  
**Subject:** RE: LU 10-194818 CU AD Appeal (Recology SE 101st Ave) BDS memo to City Council - Response to Information Submitted into the Record  
Rescheduled date: September 8, 2011 at 2:00 p.m.

Memo is entered into the record.

### **Sue Parsons**

Assistant Council Clerk

City of Portland

503.823.4085

*please note new email address:*

Susan.Parsons@portlandoregon.gov

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**From:** Frugoli, Sheila  
**Sent:** Wednesday, August 10, 2011 1:25 PM  
**To:** Moore-Love, Karla; Parsons, Susan  
**Cc:** Rees, Linly; McKinney, Susan; Esau, Rebecca  
**Subject:** LU 10-194818 CU AD Appeal (Recology SE 101st Ave) BDS memo to City Council - Response to Information Submitted into the Record

Karla and Sue,

Please enter this memo into the record and transmit a copy to the Mayor and Commissioners.

Today, I will send an electronic copy to the appellants' and applicant's attorneys. I will also alert them to the rescheduled date/time when Council intends to deliberate on this case.

Thanks,

Sheila

**Sheila Frugoli, Sr. Planner**

Land Use Services Division

Bureau of Development Services

503-823-7817

8/10/2011



**City of Portland, Oregon**  
**Bureau of Development Services**  
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#736

Emailed  
8-10-11  
Hard copy  
8-12-11  
cc L. Rees

August 10, 2011

**Memorandum**

TO: Portland City Council

FROM: Sheila Frugoli, Senior Planner, BDS Land Use Services

RE: LU 10-194818 CU AD (Recology): Staff Response to Additional Testimony and Information Submitted into the Appeal Record

Staff has reviewed the letters and documents submitted into the City Council record for the appeal of LU 10-194818 CU AD. The record includes a myriad of documents from both the applicants and appellants as well as letters of support and opposition from interested citizens. The record also includes three separate memos from BDS staff.

Staff finds that there is no new information that should warrant a reversal of the Hearings Officer's decision of approval, with conditions. However, based upon the issues raised by the opponents and the additional information provided by the applicant, staff is recommending that City Council amend the Hearings Officer's decision. This memo will address the type of food waste accepted at the facility and parameters that can be imposed to limit truck traffic and other possible off-site impacts. Further, staff is recommending conditions that speak to monitoring and inspections and a Good Neighbor Agreement.

**1. Residential and Commercial Source Food Waste:** One of the July 27, 2011 memos submitted from BDS staff to City Council called attention to the distinction between "Commercial source food waste" and "Residential food waste mixed with yard debris". As noted in the memo, Dave Dutra's (Recology) testimony to Council on July 13, 2011 included a statement that the facility would accept food waste from small commercial uses such as restaurants. In the additional information submitted from the applicant (submitted July 27, 2011), page 8 of the "Recology Operations Plan, July 1, 2011" states the "facility may accept loads of source separated food wastes from either commercial or residential collection efforts".

Staff and the Hearings Officer did not evaluate potentially large amounts of food, such as garbage collection trucks filled with food from numerous commercial businesses coming to the site. Therefore, staff recommends that the City Council decision specifically approve only residential source food waste mixed with yard debris being accepted at this facility. (See Revised Decision - Alternative 1, below)

Alternatively, if Council finds that applicable approval criteria can be met for both types (sources) of food waste being accepted at the facility, staff recommends conditions be imposed that require the applicant to document, via the Building Permit submittal, that their leachate collection system—piping and tank and the biofilter system are adequately sized to address a greater percentage of food material. (See Revised Decision - Alternative 2 and revised conditions, below)

**Revised Decision - Alternative 1:** Approval of a Conditional Use to establish a Waste-Related use that accepts Residential-source food waste mixed with yard debris, within a fully-enclosed building, as described in Exhibits A.1- A.6.

**Revised Decision - Alternative 2:** Approval of a Conditional Use to establish a Waste-Related use that accepts both Residential food waste mixed with yard debris and Commercial source food waste, within a fully-enclosed building.

**Recommended Revision to Condition C:** An aeration and biofilter system, that is designed by a certified engineer must be installed, via a Building Permit, to negate food waste odors and must be designed to address potentially large volumes of commercial source food waste—up to 35 garbage trucks with commercial-source food waste, per day.

**Recommended Revision to Condition D.** An internal drain and containment system must be installed to collect the liquid waste (leachate) inside the food waste processing building. The collection system and tank must be sized to accommodate liquids from commercial and residential source deliveries and truck and equipment washing. The containment system must be reviewed and approved by Bureau of Environmental Services plan review staff. The collected leachate must be taken to an off-site location for appropriate disposal.

**2. Level of Intensity: Traffic, Waste-Volume and Operations:** Commissioner Leonard raised concerns that the Hearings Officer's decision would allow the facility to expand its operations, i.e. its volume of trucks and waste and therefore create unanticipated off-site impacts. The Condition Use decision approved the facility—a 6.2 acre ground lease area and an approximate 46,000 square foot industrial building. Expansion of either, by more than 1,500 square feet (Zoning Code Section 33.815.040.B), will require a Conditional Use Review. The site size and building area are more than ample to accommodate significant amounts of waste being delivered to the site for transfer to the off-site composting facility. It is unlikely that the facility would need to be expanded. If Council wishes to set implementable limits to the intensity of the use, there are means available through specific conditions.

Both Metro and the Department of Environmental Quality (DEQ) review local decisions and base their approved licenses/permits on the parameters set forth by the local jurisdiction. Record-keeping, such as the material type and origin, dates, net weight is required by both Metro and DEQ. Therefore, information will be readily available to verify compliance with conditions. Compliance inspectors can easily review if a maximum limit of garbage collection trucks coming to the site per day is met. Therefore, staff recommends Council apply a condition that applies both a maximum number of garbage trucks coming to the site and a maximum number of Recology trucks used to transport waste.

Also, imposing specific hours when loads will be accepted at the facility will result in controlling the intensity of the use. Unfortunately, the information provided in the original land use review application differs from other information submitted into the record. The original Conditional Use Review application stated the hours of operation for the facility would be 7:00 am to 5:00 pm Monday-Friday and 8:00 am to 5:00 pm on Saturday. However, the submitted draft Good Neighbor Agreement states the facility currently operates Monday – Friday 6:00 am to 5:00 pm and Saturday 8:00 am to 12:00 pm. It also states that Recology may need to adjust its hours of operation. Further, Mr. Dave Dutra testified to Council that the hours of operation differ during different seasons. He stated that at times during the summer season, the SE 101<sup>st</sup> Avenue facility operates between 6:00 am to 6:00 pm, six days a week. The applicant's submitted Nuisance Mitigation Plan states, "The facility may operate more than 12 hours to accommodate incoming waste if necessary." Finally, it should be noted that the applicant's submitted noise study (see below) stated the facility would begin operations at 7 am in order to comply with City noise standards. (See below for more information regarding the facilities operations and noise impacts.) Given the varied information, staff sees

the need to impose a condition that leaves no question as to the days and times waste deliveries may occur.

So that the intensity level--traffic and noise impacts--remain within the original proposed limits and match the limits that were analyzed by the applicant's professional engineers, staff recommends the following conditions:

**Recommended New Condition:** Recology (or any successor in interest) will limit the number of garbage hauler trucks delivering food waste to the facility, to a maximum of 35 trucks per day. To transport the materials off-site, Recology is allowed up to 10 truck trips to and from the site per day.

**Recommended New Condition:** Recology (or any successor in interest) will accept food waste deliveries/deposits only between the hours of 7 am to 5 pm, Monday through Friday and 8 am to 5 pm on Saturdays.

**3. On-Going Monitoring/Unannounced Inspections:** As noted above the applicant submitted into the record an Operations Plan, which is required by Metro and DEQ. Also submitted on July 27 was a Nuisance Mitigation Plan. In the applicant's July 27 cover letter to City Council, Mr. Michael Robinson suggested a condition that would require Recology to allow BDS access to the site for "surprise" inspection visits. One of the memos submitted into the record from staff, describes DEQ's, Metro's and the City's regulatory oversight and enforcement/inspection authority. Both Metro and DEQ agencies have trained staff that are dedicated to implementing solid waste regulations. To fully utilize their technical knowledge and ability and to promptly respond to problems and complaints, the Recology suggested condition should also allow unannounced visits/inspections by all City, Metro and DEQ staff, as recommended below:

**Recommended New Condition:** Recology (or any successor in interest) will allow unscheduled/unannounced visits into the facility by Department of Environmental Quality Solid Waste representatives, Metro Solid Waste representatives, and City of Portland code inspectors.

**Recommended Revision to Condition G:** Recology (or any successor in interest) must document all nuisance complaints that are received, including but not limited to: litter, noise, odors, dust, traffic and vectors. For every nuisance complaint received, the facility will record, in a complaint log, the following information:

- The nature of the complaint; and
- The date and time the complaint was received; and
- The name, address and telephone number (if provided) of the person or persons making the complaint; and
- The Recology (or any successor in interest) employee who received the complaint; and
- Any actions taken by Recology (or any successor in interest) employee(s) to resolve the complaint.

A record of all complaints and action taken must be maintained at the facility for a minimum of one (1) year. Annually, a copy of the complaint log must be delivered by mail to the Lents Neighborhood Association Chairperson (per Office of Neighborhood Involvement website information) and the East Portland Neighborhood Office. Recology (or any successor in interest) will provide Department of Environmental Quality Solid Waste representatives, Metro Solid Waste representatives, and the Bureau of Development Services access to review the complaint log and other required logs, records and reports.

**4. Noise:** The City of Portland Noise Control Officer Paul Van Orden has reviewed the Noise Study prepared by DSA Engineers, submitted to City Council on July 13, 2011. Mr. Van Orden agrees with firm's conclusion that if they are operating the facility during the daytime (7 am to 10 pm) using the prescribed equipment and operating in an indoor environment, they should be able to maintain compliance with the City's Noise Code, Title 18. However, he has concerns the noise controls would be exceeded if Recology were to conduct activities such as moving or grinding materials during the nighttime (between the hours of 10 pm to 7 am). He recommends a condition be imposed to require more noise analysis from a licensed engineer demonstrating compliance with Title 18, if they wish to expand their operations during nighttime.

**Recommended New Condition:** Before Recology (or any successor in interest) may conduct the processing, sorting, grinding and cleaning operations during nighttime hours 10 pm to 7 am, they must submit to the City of Portland Noise Control Officer and the Bureau of Development Services Code Compliance Division, additional noise analysis from a licensed engineer demonstrating compliance with Title 18.

**5. Stormwater Management and Tire "Track Out" Concerns:** The appellants submitted into the record a letter from Dave Seluga, Shaw, a World of Solutions to the Springwater Corridor Preservation Society, dated July 20, 2011. The letter recommends the City Council require washing of trucks and tires before they leave the facility to minimize track out and odors. Given the applicant intends to construct a barrier which will preclude trucks and vehicles from driving into the food-waste (organic) transfer area, staff does not believe there will be tire "track out" problems that will enter the storm drains, affect the public right-of-way or the Springwater Corridor. The applicant intends, rather than use a sewer connection, to collect and dispose of all liquid waste from the facility. The applicant's submitted Nuisance Mitigation Plan states that "organics collection trucks are provided fresh water to rinse off any residual food wastes from the exterior of their vehicle on the concrete aerated floor after loading." Also it explains, "The only equipment that will encounter organics will be the loader used to move, bulk, and load the organics. This loader will be washed down with water as needed before it leaves the aerated concrete pad. The rinse water will be captured by the leachate collection system and stored within the liquid storage tank." Lastly, in the applicant's submitted Operations Plan, the applicant states, "Water used to mist loads, wash equipment and wash down floors is contained inside the facility".

To receive Bureau of Environmental Services approval for proposed improvements via a required Building Permit, the plans must show that the food material liquids are fully isolated and that the collection system is designed and sized appropriately. To address The BES Stormwater Management Manual, BES will require secondary containment systems for both the leachate tank and the biofilter in order to preclude leaks or ruptures that will then enter into the stormwater system. And, BES staff will verify that all washing activities will be confined within the building in the designated food-waste transfer area. Given these technical requirements are required via the Building Permit, no additional condition is needed to address stormwater and environmental resource impacts. The BES staff has the technical skills and regulatory authority to evaluate the proposed building containment area and leachate collection system.

**6. Emergency Flood Management Plan:** The applicant stated a willingness to develop a flood response plan and agree to not operate the facility if SE 101<sup>st</sup> Avenue is flooded. A condition that requires a plan be developed would be ineffective. If the City Council is concerned that flood situations would create significant pollution impacts, staff recommends the following condition be applied:



**Recommended New Condition:** Recology (or any successor in interest) must remove all food-waste materials and collected leachate from the site prior to flooding. The site may not accept food waste until the City of Portland determines that the Johnson Creek high-water level has dropped below flood stage at the Recology facility location.

**7. Good Neighbor Agreement (GNA):** Both the applicant and the Lents Neighborhood Association submitted a draft GNA and stated their intent to complete their work and formally enter into an agreement. Recology participated in and signed a GNA with the St. Johns Neighborhood Association for their North Suttle facility (a copy of the agreement was submitted into the record by the applicant). Prior to the Conditional Use Review hearing, the St. Johns Neighborhood Association and Recology completed the GNA. Because the agreement had already been developed, the Hearings Officer determined that a condition requiring an agreement did not need to be imposed through the land use review.

Because the work between the two parties has not been completed, staff recommends the following condition:

**Recommended New Condition:** Prior to occupancy of the food-waste processing building, Recology must finalize a Good Neighborhood Agreement with the Lents Neighborhood Association.

Staff does not support a condition that requires compliance with the agreement. BDS does not have the legal authority, through a land use review decision, to enforce sections of the private agreement such as draft section 5.05 that requires the City to require Recology to cease operations if DEQ receives 10 legitimate complaints within a 45 day period. DEQ, Metro and the City have requirements/codes/statutes and procedures that give each respective agency authority to address violations. A Good Neighbor Agreement cannot effectively supersede or amend the applicable regulations and protocol.

cc: Karla Moore-Love, City Council Clerk  
Sue Parsons, Assistant Council Clerk  
Linly Rees, City Attorney  
Appellants Representative, Thomas Rask  
Applicants Representative, Michael Robinson



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July 27, 2011

**Memorandum**

TO: Portland City Council

FROM: Sheila Frugoli, Senior Planner, BDS Land Use Services

RE: LU 11-194818 CU AD (Recology): Commercial Source-Separated Food Waste

During the appeal hearing before City Council on July 13, 2011, the Recology representative, Mr. Dave Dutra stated that the facility will accept food waste from small commercial uses such as restaurants. Staff has had previous discussions with Metro regarding commercial source food waste. For the other Recology facility, approved at N. Suttle Road, Metro staff asked if the Hearings Officer's approval was only for residential food waste mixed with yard debris at that site. If the City Council upholds the Hearings Officer's decision, Council should be aware that BDS staff and the Hearings Officer determined that the proposal, as described in the application, does not include the acceptance of commercial source-separated food waste.

If Council determines that the Conditional Use approval should allow commercial source separate food waste to be accepted at the SE 101<sup>st</sup> Avenue facility, their decision should clearly state so, and findings will need to be revised.

As background, the Metro "Solid Waste Regulatory Guidance Bulletin: Solid Waste Reloading and Processing Facilities Accepting Food Waste from the Metro Region" describes commercial source separated food waste as:

**"Commercial food waste":** refers to source-separated, pre-and post-consumer food waste, including meat and dairy products and waxed cardboard packaging that are typically generated in restaurants, cafeterias, grocery stores, produce warehouses, and food processing or packaging plants.

In contrast, Metro describes the other as:

**"Residential food waste mixed with yard debris":** refers to source-separated, post consumer food waste, including vegetative food waste and meat and dairy products that are generated by residences and mixed with residential yard debris in roll-cart containers. The region is starting to see residential recycling programs that promote the co-collection of food waste with yard debris in the same container. For example, the City of Portland is currently implementing a phased approach to rolling out such a program city-wide. However, once residential yard debris is mixed with food waste it is regarded by Metro to be food waste and not yard debris.

For the N. Suttle Rd facility, staff reviewed the case file (LU 10-203967 CU AD) and met with Hearings Officer Gregory Frank. In BDS's review of the file, staff found no reference to commercial source-separated food waste. The application and memos from the applicant specifically referred to the material as "food waste mixed with green (yard) waste". There was no mention of potentially large amounts of separated food being hauled from uses such as

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restaurants, grocery stores and food processing plants being delivered to the facility. Subsequently the decision did not evaluate any possible impacts.

Mr. Frank reviewed his notes from the hearing and found no notation that the applicants described a plan to accept source-separated commercial food waste. Mr. Frank explained to staff that his decision to approve the use and particularly the Adjustment allowing the facility to be open (not fully enclosed) was based upon the applicant's oral and written testimony that 95 percent of the mixed material would be yard debris and 5 percent would be food. For these reasons, BDS informed Metro that the Suttle Road facility was only allowed to accept the residential food waste-yard debris blend.

Staff is submitting this information while the record is open so that we may provide, in the next two weeks, additional comments to City Council. We will submit additional analysis and potential recommendations that respond to anticipated impacts and nuisance controls needed for a facility that accepts both Commercial and Residential sources of food waste.



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July 27, 2011

**Memorandum**

TO: Portland City Council

FROM: Sheila Frugoli, Senior Planner, BDS Land Use Services

RE: LU 10-194818 CU AD (Recology): Waste-Related Use Regulatory Oversight by the Department of Environmental Quality (DEQ), Metro and the City of Portland

At the July 13, appeal hearing City Council asked questions about the Land Use Review decision and on-going monitoring and inspections of the proposed Waste-Related Use and operations of this Recology site. The purpose of this memo is to respond to this topic, and provide City Council with additional background information. Because some of this information is new, staff is submitting this information while the record is open.

In order to operate a waste-related facility in the City of Portland, an operator must receive Conditional Use Review approval on an industrially-zoned site. Once permitted, the Waste-Related Use must operate in compliance with the Land Use Review decision, Conditions of Approval and the Zoning Code development standards found in Chapter 33.254, *Mining and Waste-Related Uses*. Further, Metro requires the operator to obtain a Metro solid waste facility license or franchise. In addition, the Department of Environmental Quality (DEQ) also requires a permit to be obtained. Both the DEQ and Metro have designated staff that issue permits and monitor compliance of permitted Waste-Related facilities.

The Conditional Use Review and Zoning Code standards address the adequacy of public services, including transportation-related impacts, water, sewer and stormwater capacity, fire and police response. Impacts to the surrounding industrial area, desired character and environmentally sensitive areas are also considered. The Bureau of Development Services is responsible for Zoning Code/Land Use Review implementation and enforcement. The Bureau of Environmental Services (BES) monitors compliance for source control permits.

Nuisances such as vectors, odor and health and safety impacts are specifically addressed by the City of Portland Zoning Code as well as through the permit requirements of DEQ and Metro. Below is a summary of each agency's monitoring and enforcement role.

**Department of Environmental Quality – Solid Waste**

The documents attached to this memo include DEQ's *Fact Sheet: Procedures and Criteria for Solid Waste Disposal Permits* and *Instructions: Permit Application for Material Recovery Facilities and Transfer Stations* which describe the DEQ permitting requirements. The Recology facility is classified as a Material Recovery Facility because it conducts sorting operations of authorized waste to recover items that can be reused or recycled.

The application for a DEQ permit requires a description of wastes accepted, site layout, and operations. Applicants are required to submit an Operations Plan with their application materials. The application information requires a plan to describe how the facility will operate

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in compliance with applicable regulations and must include operational requirements in addition to details about standard operation procedures such as hours, staffing, training, etc.

Once DEQ approves the plan, it is an enforceable document that the facility is required to comply with. The facility is required to keep the plan updated to reflect current operations and site conditions. If complaints are received and/or at inspection, when DEQ staff observes problems, the facility is notified that it must immediately address the issue and/or modify its operational plan.

DEQ has the authority to require actions/improvements to address odor and vector complaints. Facilities failing to operate in compliance with an approved Operations Plan or failing to maintain the plan as required, may receive a Warning Letter with an Opportunity to Correct (an enforcement letter). Rarely is a permit revoked. In most instances, facilities resolve the problems.

**Vehicle Trip and/or Quantity Limits:** DEQ does not typically set limits on tonnage, number of loads or truck trips. However, when necessary, DEQ can, and has, set such limits to protect human health and the environment due to poor operations, poor compliance or documented repeated violations. The size of the facility will limit how much waste an operator can realistically accept and process. Operators that exceed the capacity of their facility will have operational issues often resulting in compliance issues and possible enforcement actions. As far as loads and number of truck trips, these are not commonly limited by DEQ's solid waste permit. In the past local government agencies have set operation restrictions through land use, licenses or franchise agreements and the DEQ permit, if appropriate, will mirror or reference these restrictions. DEQ requires the applicant to complete local land use processes to determine whether or not the acceptance of food waste is compliant with local land use regulations.

DEQ will review the design and specifications of facility improvements (leachate collection system, biofilters, etc.). Applicants have to provide the details and design basis of their proposed plans. DEQ reviews the plans to determine whether the facility's proposal is reasonable given the proposed operations. DEQ will look at the design and size of the leachate collection system when a Waste-Related facility receives City approval and the applicants submit a complete application.

**Inspections:** Solid waste facilities must submit information about waste accepted, recycled and disposed annually. DEQ conducts unannounced inspections. Given certain circumstances DEQ will conduct scheduled site visits but compliance inspections are unannounced.

**Inter-governmental coordination:** DEQ and Metro coordinate regularly as the agencies have overlapping authorities. DEQ and Metro consult on permit applications, permit and license requirements, operational concerns, inspections, and enforcement matters. DEQ and Metro discuss mutual matters regularly, and sometimes daily when warranted. Further, when issues are observed, DEQ staff will notify the local enforcement agency of possible violations to the local requirements such as a Land Use Review decision and associated Conditions of Approval.

#### **Metro Solid Waste Compliance and Clean-Up Program**

The attached documents, *RGB9 SW Reloading and Processing Facilities Accepting Food Waste* and an e-mail from Bill Metzler, Senior Solid Waste Planner at Metro to Arianne Sperry, Bureau of Planning and Sustainability describe Metro's role in regulating solid waste facilities in the Portland region. Metro supports the region's sustainability and waste reduction goals by ensuring that reloading and processing facilities are appropriate, safe, and well-operated. Metro is responsible for authorizing, monitoring and regulating the operations of solid waste facilities and ensuring that such facilities meet applicable regulatory, operational, environmental, contractual, and financial requirements.

Facilities must receive Metro authorization before accepting food waste generated in the Metro region. Applications for such authorization require that the facility submit detailed design and operation plans. Facilities must be designed and operated to preclude:

- Environment. Threats to the environment including but not limited to, stormwater or groundwater contamination, air pollution, and improper acceptance of hazardous or prohibited waste.
- Health and safety. Conditions that may degrade public health and safety, including but not limited to, fires, vectors, pathogens and airborne debris.
- Nuisances. Conditions, including but not limited to, litter, dust, malodors and noise.

Facilities must also meet the following performance goals:

- Processing. Food waste must be processed in a timely manner and the end-products are safe and marketable.
- Reloading. The reloading and transfer of food waste to a Metro authorized processing facility is conducted rapidly and in a manner that precludes the creation of off-site odor or nuisance impacts.
- Record keeping. Facilities shall keep and maintain complete and accurate records of the amount of all solid waste and recyclable materials that are received, recycled, reloaded, processed and disposed. This information must be submitted to Metro on a monthly basis.

Metro has broad authority to apply conditions before issuing licenses and franchises to ensure that performance goals are met and also has staff dedicated to monitor and inspect solid waste facilities. If a facility is not meeting performance goals, Metro may take a range of enforcement actions, including revoking the facility's license or franchise.

### **City of Portland**

**Bureau of Development Services:** The Bureau of Development Services Code Compliance section generally responds to development-related complaints. BDS has enforcement officers who respond to possible violations to the various codes that implement building, zoning, housing and noise regulations. Scheduled or unannounced inspections are not offered unless a complaint is received regarding a possible violation.

Code Compliance staff can best respond to violations if a Land Use Review decision has imposed measurable/verifiable requirements such as floor area limits, installation of mechanical and plumbing facilities and documentation of activities/actions such as logs.

Generally, the first step in documenting compliance with Land Use Review decisions is at building permit review. In order to evaluate a proposed biofilter system, the BDS Plan (Mechanical) Review staff must have manufacturing cut sheets and specifications. To evaluate a negative air flow system, building floor plans and air flow calculations must be submitted. The plans should be prepared by a licensed mechanical engineer.

BDS has tools that can measure noise. It does not have a tool to measure malodors. Generally, when technical analysis is required to address a complaint such as excessive noise or the detection of malodors, BDS can contract with an independent expert to perform such measurements. The City may accept measurements made by an independent expert hired by the controller or operator of the off-site impact source. If the City contracts to have measurements made and no violation is found, the City will bear the expense, if any, of the measurements. If a violation is found, City expenses will be charged to the violator. Applicants

may request changes to an approved Conditional Use through the same Land Use Review. The proposed change will be evaluated with the same approval criteria.

*Bureau of Environmental Services:* The Source Control Division of BES conducts annual, scheduled inspections of sites with National Pollutant Discharge Elimination System (NPDES) permits. The Freeway Land (Jameson Partners) site has an NPDES permit. The NPDES permit requires water quality monitoring and sets parameters for activities allowed at the site. The permit would not specifically regulate/limit food waste activities. At Building Permit review, the Bureau of Environmental Services implements the Stormwater Management Manual. Specifically, Chapter 4 of the manual requires containment and isolation of liquids such as leachate from entering the City stormwater system. The BES staff has the technical skills and regulatory authority to evaluate the proposed building containment area and leachate collection system.

## Fact Sheet

# Procedures and Criteria for Solid Waste Disposal Permits

### Background

This fact sheet describes the procedures and criteria the Oregon Department of Environmental Quality (DEQ) uses to review applications and decide whether to approve or deny permits for solid waste disposal sites.

### Applicability

A facility must apply for a Solid Waste Disposal Permit, registration, or letter authorization prior to operation if it plans to store, receive, process, treat, land apply, or landfill any garbage, demolition waste, industrial waste, land clearing debris, or sludge. Permits are issued under Oregon Revised Statutes 459.005 to 105, and 459.205 to 459.385, Oregon Administrative Rules (OAR) 340-093 to 340-097, and 40 Code of Federal Regulations Part 258.

### Facilities that require Solid Waste Disposal Permits include:

- Landfills for municipal solid waste.
- Landfills for non municipal solid waste, including:
  - Wood waste landfills
  - Industrial waste landfills
  - Construction and demolition landfills
- Energy recovery facilities.
- Incinerators receiving solid waste from the public or a collection service.
- Regulated composting facilities.
- Sludge disposal sites.
- Land application disposal sites.
- Transfer stations.
- Non-exempt material recovery facilities.
- Solid waste treatment facilities.

### Solid Waste Permit Fees

Application Processing and Annual Solid Waste Permit Fees vary depending upon the type of facility and volume of material handled. The DEQ office listed on the back can provide you with detailed information about the fees that will be required for your facility. This information can also be

accessed on DEQ's Solid Waste Permitting Fees Web page:  
[www.deq.state.or.us/lq/sw/permitfees.htm](http://www.deq.state.or.us/lq/sw/permitfees.htm)

### Application Process

The application process for Solid Waste Disposal Permits generally includes:

1. The applicant contacts the appropriate DEQ regional office for answers to questions, and to begin the application process.
2. The applicant completes the Solid Waste Disposal Permit application which can be found at:  
[www.deq.state.or.us/lq/sw/permits.htm](http://www.deq.state.or.us/lq/sw/permits.htm)  
or by contacting your regional DEQ office.

### Supplemental requirements include:

- A Land Use Compatibility Statement signed by the local land use authority.
  - Demonstration of the need for a new, modified or expanded facility.
  - Evidence of compatibility with the local waste management plan.
  - A Site Characterization Report.
  - Detailed plans and specifications.
  - A recommendation from the local solid waste planning authority..
  - A certificate of business registry.
  - Identification of any other known or anticipated permits.
  - Depending on the type of facility to be constructed, other information may also be requested.
3. The applicant submits the application and the required fees to DEQ. If the application is incomplete, DEQ notifies the applicant of missing information or documents. DEQ may reject an incomplete application.
  4. A permit is drafted after receipt of a complete application.
  5. For new disposal sites with a known high level of public interest, a public meeting to solicit input may be held before the permit is in the draft stage.



State of Oregon  
Department of  
Environmental  
Quality

Land Quality Division  
Solid Waste Policy and  
Program Development  
811 SW 6<sup>th</sup> Avenue  
Portland, OR 97204  
Phone: (503) 229-5913  
(800) 452-4011  
Fax: (503) 229-6977  
Contact: Loretta Pickerell  
[www.oregon.gov/DEQ/](http://www.oregon.gov/DEQ/)

07-LQ-043  
Updated: 07/10/2007  
By: Lissa Druback



6. DEQ posts a 30 or 35-day public notice, according to the environmental and public health significance of the proposed facility, inviting the public to comment on the proposed permit. If the public shows significant interest, or if DEQ deems it necessary, a hearing is held.
7. Based on the submitted information and public input, DEQ decides whether to issue, deny, or modify the permit.
8. After construction is finished, DEQ may require a Construction Certification, signed by the project engineer or manager, stating that the construction was completed in accordance with the approved plans.

**Average Processing Time:**

180 days (less time for material recovery facility, transfer station and composting facility permits).

**Criteria for Evaluating a Permit Application**

DEQ uses the criteria in Oregon laws and administrative rules in determining whether to issue or deny a permit application for a disposal site. Chapter 340, Divisions 93 through 97 of Oregon Administrative Rules provide detailed criteria for how disposal sites must be constructed and operated to protect human health and the environment. Criteria include location restrictions, design and operating requirements, and closure and post-closure care requirements.

DEQ will review the application and accompanying documents described above to determine whether the criteria have been satisfied. Your regional DEQ office can provide you with a copy of the statutes and rules that apply to your proposed facility. The applicable statutes and rules are also available on DEQ's Web site at <http://www.deq.state.or.us/regulations/rules.htm>.

**Typical Permit Requirements**

The Solid Waste Disposal permit may impose requirements to assure the site is protective of human health and the environment.

**Typical requirements imposed by a Permit include:**

- Use of "best management practices" to prevent contamination of the surrounding environment.
- Groundwater monitoring and corrective action.
- Provision of a recycling collection site.
- Vector and bird control.
- Quarterly reporting.
- Gas emissions monitoring and control.
- Closure and post-closure plans
- Financial assurance.

**Note:** A permit from the Division of State Lands may also be required if any part of a disposal site is constructed in a wetland or into any waterway. Contact DSL at (503) 378-3805 for more information.

**Alternative Formats**

*Alternative formats of this document can be made available. Contact DEQ Public Affairs for more information (503) 229-5696.*

**Additional information**

Additional solid waste program information can be found on the DEQ's Solid Waste Web site, or directly at:

DEQ Northwest Region  
Solid Waste Permit Coordinator  
2020 SW Fourth Avenue, #400  
Portland, OR 97201  
(503) 229-5353

DEQ Western Region  
Solid Waste Permit Coordinator  
750 Front Street NE, Suite 120  
Salem, OR 97301  
(503) 378-5047 x85047

DEQ Eastern Region  
Solid Waste Permit Coordinator  
400 East Scenic Drive, #307  
The Dalles, OR 97058  
(541) 298-7255 x21



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### Land Quality

### Solid Waste

*DEQ Home > Land Quality > Solid Waste > Permits > Instructions: Permit Application for Material Recovery Facilities and Transfer Stations*

 Sign up to receive e-mail updates from the Solid Waste Program.

### Permits

#### Instructions: Permit Application for Material Recovery Facilities and Transfer Stations

- Prevention and Reuse
- Recovery and Compost
- Disposal
- Educational Materials
- Resources
- Solid Waste Forum and News
- Conferences, Training & Workshops

#### Introduction

Oregon Revised Statutes (ORS 459) require that material recovery facilities and transfer stations apply to DEQ for a Solid Waste Disposal Permit prior to starting operation.

#### Application Process

The following documentation must be submitted in writing to DEQ in order for the permit application to be complete. There has to be a clear demonstrated need for the proposed new, modified or expanded disposal site or for the proposed change in the method or type of disposal.

A complete application should include the following items:

- **Items 23 through 28 on the permit application.** As a reminder these items are listed below.
  - Completed and signed Land Use Compatibility Statement (LUCS).
  - Written recommendation from the local solid waste planning authority.
  - A Certificate of Business Registry.
  - Identifications of any other known or anticipated permits.
  - Application fee and compliance fee (if required).
  - Any other information DEQ deems necessary.
- **Detailed Plans and Specifications**

Details to be included in the plans and specifications are described on the following page. The types of plans used to describe the site specific facility information are as follows:

  - Design and Construction Plans are used to show how the facility will be designed and constructed. The details to include in the plan are described on the following pages.
  - Operational Plans are used to show how the facility will be operated. The details to be included in the operational plan are described on the following pages.

#### Detailed Plans and Specifications

### **Purpose of the Detailed Plans and Specifications**

The purpose of the required plans and specifications is to describe in detail:

- What you are proposing to have permitted,
- What wastes the facility will receive,
- How wastes will be screened to avoid acceptance of hazardous wastes,
- Where waste, if any remaining, will be shipped (or sent) for final disposal,
- How you propose to operate the site without polluting the waters of the state,
- What will be the facility layout,
- What will need to be built to operate the site in an environmentally safe manner,
- What equipment (and backup, if required) will be used or installed, and
- Any other details unique to your proposal.

Once approved, these plans become an enforceable part of your permit.

### ***What to include in the Plans and Specification***

Plans and specifications for a fixed or permanent transfer station or material recovery facility must include a Design and Construction Plan and an Operational Plan. These plans are used to describe the location and physical features of the facility as well as address specific details about the facility. These details can be illustrated with a map and in writing. Additional details to be contained in each plan are described on the following pages.

### **Design and Construction Plans**

These types of plans are used to describe in detail what you intend to construct at your facility.

- Construction cannot begin until the Department has approved the plans.
- Once approved, the Department must approve of any modifications.
- In most cases, plans must be prepared and stamped by an engineer registered in the State of Oregon.

The design and construction plan must meet the following requirements;

<b>Requirements</b>	<b>Description</b>
Waste Water Discharge	There must be no discharge of wastewater to public waters except in accordance with permits from the Department, issued under ORS 468B.050.
Access Roads	All weather roads must be provided from the public highways or roads, to and within the disposal site and must be designed and maintained to prevent traffic congestion, traffic hazards and dust and noise pollution.
Drainage	The site must be designed such that surface drainage will be diverted around or away from the operational area of the site.
Fire Protection	Fire protection must be provided in accordance with plans approved in writing by the Department and in compliance with pertinent state and local fire regulations.
Fences	Access to the site must be controlled by means of a complete perimeter fence and gates which may be locked.
Solid Waste Disposal	Sanitary waste disposal must be accomplished in a manner approved by the Department or state or local health agency

	having jurisdiction.
Truck Washing Facilities	Truck washing areas, if provided, must be hard surfaced and all wash waters must be conveyed to a catch basin, drainage and disposal system approved by the Department or state or local health agency having jurisdiction.

### Operational Plans

This type of plan is used to describe how you intend to operate your facility in compliance with the applicable regulations. In addition to describing normal facility operations (such as hours, staffing and daily operations) the facility must comply with the following operational requirements;

Requirements	Description
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Storage	All solid waste deposited at the site must be confined to the designated dumping area. Accumulation of solid wastes must be kept to minimum practical quantities.
Salvage	A permittee may conduct or allow the recovery of materials such as metal, paper and glass from the disposal site only when such recovery is conducted in a planned and controlled manner approved by the Department in the facility's operations plan. Salvaging must be controlled so as to not create unsightly conditions or vector harborage. All salvaged material must be stored in a building or enclosure until it is removed from the disposal site in accordance with a recycling program authorized in the operations plan.
Nuisance Conditions	Blowing debris must be controlled such that the entire disposal site is maintained free of litter. Dust, malodors and noise must be controlled to prevent air pollution or excessive noise as defined by ORS Chapters 467 and 468 and rules and regulations.
Health Hazards	Rodent and insect control measures must be provided sufficient to prevent vector production and sustenance. Any other conditions that may result in transmission of disease to man and animals must be controlled.
Records	The Department may require such records and reports as it considers are reasonably necessary to ensure compliance with conditions of a permit or OAR 340, Divisions 93-97. If ownership of the permitted facility changes, the new permittee is responsible for ensuring that the records are transferred from the previous permittee and maintained for the number of years required by the Department.

If you have any questions or need more information, please contact the regional solid waste permit coordinator in your area.

- solid waste permit coordinators

*Disclaimer: These instructions are provided so potential permittees can more easily understand DEQ's requirements for material recovery facilities and transfer stations in Oregon. For complete rule language and definitions, refer to Oregon Administrative Rules (OAR) Chapter 340, Divisions 93, 96, and 97.*

[print version]

For more information about **DEQ's Land Quality Division and its programs**, see the contact page.

**Oregon Department of Environmental Quality**

Headquarters: 811 SW Sixth Ave., Portland, OR 97204-1390

Phone: 503-229-5696 or toll free in Oregon 1-800-452-4011

Oregon Telecommunications Relay Service: 1-800-735-2900 FAX: 503-229-6124

The Oregon Department of Environmental Quality is a regulatory agency authorized to protect Oregon's environment by the State of Oregon and the Environmental Protection Agency.

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**Frugoli, Sheila**

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**From:** Sperry, Arianne  
**Sent:** Tuesday, July 26, 2011 10:13 AM  
**To:** Frugoli, Sheila  
**Subject:** FW: summary of Metro's regulatory oversight re: facilities receiving food waste  
**Attachments:** RGB9\_SW Reloading and Processing Facilities Accepting Food Waste.pdf

Here is some information from Metro that we may want to submit into the record.

Arianne Sperry  
Solid Waste & Recycling  
City of Portland  
Bureau of Planning & Sustainability  
503-823-6664

Please note my new email address: [arianne.sperry@portlandoregon.gov](mailto:arianne.sperry@portlandoregon.gov)  
and the City's new web domain: [www.portlandoregon.gov](http://www.portlandoregon.gov).

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**From:** Bill Metzler [mailto:Bill.Metzler@oregonmetro.gov]  
**Sent:** Tuesday, July 26, 2011 8:50 AM  
**To:** Sperry, Arianne  
**Cc:** Roy Brower  
**Subject:** [Approved Sender] RE: summary of Metro's regulatory oversight re: facilities receiving food waste

Arianne:

This email is intended to address your inquiry about Metro's regulatory role in managing impacts associated with solid waste facilities – including food waste reloading facilities similar to that proposed by Recology at the Foster Road Recovery Facility.

Metro is responsible for managing the regional solid waste system to ensure that it is maintained in a sustainable, economically healthy, and environmentally sound manner. In that regard, Metro is responsible for authorizing, monitoring and regulating the operations of private solid waste facilities -like the proposed Recology food waste reload at the Foster Road Recovery Facility - and to ensure that such facilities meet applicable regulatory, operational, environmental, contractual, and financial requirements.

Metro's regulatory oversight of the solid waste system consists primarily of monitoring private solid waste operations and enforcing compliance with the Metro Code, administrative procedures, performance standards, Metro-granted authorizations (i.e. licenses and franchises), and flow control instruments (i.e. non-system licenses and designated facility agreements). Metro's regulatory program would conduct periodic unannounced facility inspections of the proposed Recology Foster Road Recovery Facility. Metro inspectors ensure that the region's solid waste facilities comply with the Code and other applicable franchise standards. Metro inspections are conducted at most facilities several times per year and more frequently depending upon the individual facility.

Metro inspectors document their field observations, compliance findings, and other pertinent site information. In the event that violations are discovered during an inspection, the circumstances related to the discovery of the violation, nature of the violation, and any other pertinent information are documented in the Inspection Report in order to support an enforcement action if necessary. Metro may initiate enforcement actions in response to violations of the Code or Metro-granted authorizations including assessment of penalties as

7/26/2011

appropriate. In cases where violations of local, state, or federal laws are identified, the Metro staff coordinates with the appropriate regulatory agency for further investigation and follow-up.

I have attached a copy of a Metro regulatory guidance bulletin for food waste facilities that provides solid waste facility operators with an overview of the considerations that guide Metro's regulatory decisions about food waste facilities. I hope you find the bulletin informative.

Bill Metzler  
Senior Solid Waste Planner  
Finance and Regulatory Services  
Email: [bill.metzler@oregonmetro.gov](mailto:bill.metzler@oregonmetro.gov)  
Tel: 503-797-1666

[www.oregonmetro.gov](http://www.oregonmetro.gov)  
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**From:** Sperry, Arianne [<mailto:Arianne.Sperry@portlandoregon.gov>]  
**Sent:** Monday, July 25, 2011 7:43 PM  
**To:** Bill Metzler  
**Subject:** summary of Metro's regulatory oversight re: facilities receiving food waste

Bill

I am looking for a summary of Metro's regulatory oversight with regards to facilities that receive food waste. If you have a document you can provide, that would be great.

Specifically I am wondering:

- How broad is Metro's regulatory authority?
- What criteria does Metro consider when issuing the license?
- What types of conditions may Metro impose on facilities?
- Can you describe the tools Metro uses to ensure that the facilities are operated as described and do not result in off-site impacts? For example: How often do you visit facilities? Can you conduct unannounced inspections? Is your enforcement team hampered by budget cuts and staff reductions?

Thank you so much, Bill! I appreciate any help you can provide.

Arianne Sperry  
Solid Waste & Recycling  
City of Portland  
Bureau of Planning & Sustainability  
503-823-5664

Please note my new email address: [arianne.sperry@portlandoregon.gov](mailto:arianne.sperry@portlandoregon.gov)  
and the City's new web domain: [www.portlandoregon.gov](http://www.portlandoregon.gov).

7/26/2011



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# Metro Solid Waste Regulatory Guidance Bulletin

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GB 9

JUNE 2011

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## **Solid Waste Reloading and Processing Facilities Accepting Food Waste from the Metro Region**

(Applicable to Both In-Region and Out-of-Region Facilities)

*Metro's solid waste regulatory system supports the region's sustainability and waste reduction goals by ensuring that waste generated in the Metro region is delivered to appropriate, safe, and well-operated reloading and processing facilities. Metro routinely coordinates and consults with local governments and the Oregon Department of Environmental Quality (DEQ) about facilities, whether they are located inside or outside the region.*

### **I. Introduction**

This Metro regulatory guidance bulletin has been developed to provide solid waste facility owners and operators an overview of the considerations that will guide Metro's regulatory decisions about food waste reloading and processing facilities that seek to accept food waste from the Metro region. Facilities intending to reload or process food waste, including composting, anaerobic digestion and reloading facilities must obtain Metro approval and comply with the requirements in the Metro Code, including but not limited to:

- 1) Provide proof that the applicant has received local land use approval;
- 2) Demonstrate that the food waste will be responsibly and safely managed;
- 3) Minimize the creation of negative impacts on adjacent communities and businesses; and
- 4) Ensure that the end-product is safe and marketable.

The most common feedstocks used for producing compost in the Metro region are yard debris and wood waste. However, a number of composting facilities in Oregon are now obtaining DEQ permits to accept all types of food waste, including meat and dairy products. This bulletin addresses two general categories of food waste that are shaping Metro's regulatory decisions about food waste reloading and processing, and are important to achieving the region's solid waste recovery goals: **commercial food waste and residential food waste mixed with yard debris.**

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*Metro Solid Waste Regulatory Guidance Bulletin  
Solid Waste Processing and Reload Facilities Accepting Food Waste from the Metro Region*

1  
June 2011

Metro Solid Waste Compliance and Cleanup, 600 NE Grand Avenue, Portland, OR 97232  
(503) 797-1835

<p><b>TO REPORT ILLEGAL DUMPING</b> <b>CALL (503) 234-3000 or report via Internet at <a href="http://www.oregonmetro.gov">www.oregonmetro.gov</a></b></p>
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These two categories are described below:

**"Commercial food waste"**: refers to source-separated, pre-and post-consumer food waste, including meat and dairy products and waxed cardboard packaging that are typically generated in restaurants, cafeterias, grocery stores, produce warehouses, and food processing or packaging plants.

**"Residential food waste mixed with yard debris"**: refers to source-separated, post-consumer food waste, including vegetative food waste and meat and dairy products that are generated by residences and mixed with residential yard debris in roll-cart containers. The region is starting to see residential recycling programs that promote the co-collection of food waste with yard debris in the same container. For example, the City of Portland is currently implementing a phased approach to rolling out such a program city-wide. However, once residential yard debris is mixed with food waste it is regarded by Metro to be food waste and not yard debris.

To ensure that malodors and other nuisance impacts associated with deliveries of decomposing food wastes do not become problems for nearby homes and businesses, a facility that accepts food waste will be required to meet more stringent odor control standards than a facility accepting only yard debris. Existing yard debris reloading and composting facilities will need to obtain the necessary additional authorizations from Metro to accept residential food waste mixed with yard debris or commercial food waste.

## II. Metro's Regulatory Approval Process

Facilities must receive Metro authorization before accepting food waste generated in the Metro region. Applications for such authorization require that the facility submit detailed design and operation plans.

### In-region reloading or processing facility (located inside the Metro boundary)

In order to operate inside the Metro region, a food waste reload or processing facility must submit an application to Metro in order to obtain a Metro solid waste facility **License or Franchise**. An existing Metro licensed yard debris reload or yard debris composting facility must apply for and receive Metro authorization prior to accepting any food waste – even if it is comingled with yard debris. Metro Code Chapter 5.01 governs solid waste facility regulation and describes the application process and regulatory requirements.

### Out-of-region reloading or processing facility (located outside the Metro boundary)

A processing facility located outside the Metro region that seeks to accept food waste generated from inside the Metro region on an ongoing basis may wish to seek approval to become a **Designated Facility** by the Metro Council. Upon approval, the facility would then enter into an agreement with Metro called a **Designated Facility Agreement (DFA)**. The DFA authorizes the facility to receive and process source-separated food waste from the Metro region under specific terms and

conditions that address facility design standards, operating conditions and reporting obligations.

A hauler (transporter), generator, reloading facility, or transfer facility that seeks to deliver food waste from the Metro region directly to an out-of-region facility that has not obtained a Metro DFA, must apply for and obtain a **Non-System License (NSL)**. An NSL may be granted by the Metro Council for up to two years. Metro Code Chapter 5.05 governs solid waste that leaves the Metro region and describes requirements for obtaining an NSL or a DFA.

An application for a Franchise, Designated Facility Agreement, or a Non-System License is subject to Metro Council approval. The Metro Chief Operating Officer approves Licenses to operate food waste reloads that do not conduct food waste processing activities. The Metro application process requires that any facility seeking to accept Metro-area food waste must participate in a pre-application meeting with Metro and submit an application in accordance with the applicable Metro Code requirements. These requirements include proof of local land use approval and compliance with permitting requirements of the DEQ (or its out-of-state equivalent).

### III. General Performance Goals

The following performance goals describe Metro's general expectations for any food waste processing and reload facility. These goals are similar to those adopted by Metro for all material recovery facilities. Each of the goals listed below must be addressed as part of the application process for both in-region and out-of-region facilities, including applications for NSLs:

- 1) *Environment.* Facilities must be designed and operated to preclude the creation of undue threats to the environment including but not limited to, stormwater or groundwater contamination, air pollution, and improper acceptance and management of hazardous waste and other prohibited waste.
- 2) *Health and safety.* Facilities must be designed and operated to preclude the creation of conditions that may degrade public health and safety, including but not limited to, fires, vectors, pathogens and airborne debris.
- 3) *Nuisances.* Facilities must be designed and operated to preclude the creation of nuisance conditions, including but not limited to, litter, dust, malodors and noise.
- 4) *Processing.* Facilities processing food waste must be designed and operated to assure that the food waste is processed in a timely manner and the end-products are safe and marketable.
- 5) *Reloading.* Facilities conducting food waste reloading shall be designed and operated to assure that the reloading and transfer of food waste to a Metro authorized processing facility is conducted rapidly and in a manner that precludes the creation of off-site odor or nuisance impacts.

- 6) *Record keeping.* Facilities shall keep and maintain complete and accurate records of the amount of all solid waste and recyclable materials that are received, recycled, reloaded, processed and disposed. This information must be submitted to Metro on a monthly basis.

#### IV. General Operating Guidelines

The following operating guidelines clarify some of Metro's key expectations regarding odor management practices at food waste processing and reloading facilities. In particular, the following facility design and operating concerns must be addressed as part of the application process for both in-region and out-of-region facilities, including applications for NSLs:

##### Food Waste Processing Facilities

- A. *Feedstock intake building required.* Food waste, especially large volumes of commercial food waste, has the potential to create malodor releases at the feedstock intake and preparation area where the food wastes are initially delivered and mixed with other feedstocks (e.g., yard debris, compost overs, wood chips) to prepare an optimum blend for composting.

Feedstock preparation or processing might include the following types of activities:

- Removing contaminants (includes opening and removing bags).
- Feedstock grinding and blending to set optimum particle size, porosity, and carbon to nitrogen ratio.
- Blending and mixing the feedstocks with compost overs, finished compost or other additives to control odors or improve biological activation.

The feedstock intake and preparation activities must be conducted inside a roofed structure, enclosed on at least three sides with the ability to effectively enclose the fourth side to contain malodors. Further, the building must have an effective negative air circulation system that can be routed to an effective biofilter, or an alternative method for preventing odors from being released from the building. Alternatives to this management method may be considered on a case-by-case basis and would depend on the details of the specific proposal.

- B. *Alternative management methods for a feedstock intake building.* The suitability of a proposed alternative management method will be evaluated based on: 1) the processing site location (urban or rural and proximity of residences and businesses to the facility), 2) the volume, type and condition of food waste feedstocks, 3) the on-site processing and odor control methods, and 4) the record of the facility (or owner/operator) in effectively managing feedstocks and malodors. For example, if the processing site is located in a relatively isolated rural area and the odor control and processing methods are proven to be highly effective – then an on-site intake and mixing building may not be required by Metro. However, the intake building may be a necessary feature that will be required by

Metro if the facility cannot control odors associated with intake and feedstock preparation.

Examples of two alternative management options are outlined below.

Option 1 - No intake building at processing facility. Food waste deliveries and food waste feedstock preparation activities are not conducted in an enclosed building. The facility location and odor management methods preclude and prevent off-site odor impacts. This option could be considered for existing yard debris composting facilities that seek to accept residential food waste mixed with yard debris provided that such deliveries are managed in accordance with an effective facility odor control plan.

- *Site location and processing.* The processing facility is located in a rural or rural/urban edge area with sufficient buffer zones that adequately mitigate impacts on surrounding communities. On-site processing and odor management methods must meet or exceed industry standards and are proven to be effective.
- *Volume, condition and source of food waste.* Food waste volumes can be highly variable, ranging from low volume deliveries of fresh food waste collected from local sources (e.g. deliveries in a packer truck or front end loader), to very large volumes collected, consolidated and reloaded in urban areas from further away. Large volumes of food waste deliveries (e.g. deliveries in containers other than a packer truck or front end-loader) to less isolated processing sites might require off-site feedstock preparation in an enclosed building to stabilize food waste odor potential prior to reloading and delivery to the processing site (see Option 2 below).

Option 2 - Off-site intake and feedstock preparation building. Like Option 1, an intake and feedstock preparation building may not be required at the processing site. However, large volumes of commercial or residential food waste that are typically collected in urban areas could be delivered to a separate reload facility that controls odors associated with intake and feedstock preparation. The purpose is to adequately prepare large volumes of food waste feedstocks so that they arrive at the processing facility in a state that is unlikely to generate odors, will minimize additional handling and allow feedstocks to be immediately placed into the composting system.

- *Site location and processing.* Under this option, the processing site might be located near an urban area with insufficient buffer zones to adequately mitigate negative impacts associated with feedstock intake and preparation activities. For example, nearby residences or businesses could be adversely impacted by malodors released from deliveries of large volumes of reloaded urban food wastes. The on-site processing and odor management methods must meet or exceed industry standards that are proven to be effective.
- *Volume, condition and source of food waste.* Food waste volumes under this option can be highly variable, ranging from low volume deliveries of fresh food

waste collected from local sources, to very large volumes collected, consolidated and reloaded in urban areas. Smaller volumes collected fresh from local food waste sources that are delivered in packer trucks or front-end loaders might not require any off-site feedstock preparation in an enclosed building. Such deliveries could be managed in accordance with an effective facility odor control plan. Loads of fresh food waste will result in less odor issues than food waste that has started to decompose.

- C. Processing systems. The building requirements for the feedstock intake and preparation activities have already been addressed in the preceding section. Processing facilities must prepare and implement a Metro approved facility operating plan that addresses processing procedures such as: inspecting incoming loads, managing prohibited waste, odor control, dust prevention, vector control, emergencies, and nuisance complaints. Applications for Metro food waste processing facility authorizations also require that facility design and operating plans address the following:

*Biofilters.* Facilities proposing to use a biofilter must provide the design criteria and specifications for the biofilter in the facility design plan to effectively control odors.

*Leachate management.* Facilities must manage leachate to avoid off-site impacts. Food wastes can release large amounts of liquid. In addition to causing odors, these liquids contain nutrients and pathogens that must be managed in accordance with the rules and regulations of the DEQ or applicable local regulations.

*Stormwater management.* Facilities must ensure stormwater is controlled to minimize contamination with raw food waste feedstocks and liquids that have not undergone pathogen reduction. Stormwater must be managed in accordance with the DEQ or applicable local regulations.

*Pathogen reduction.* Facilities must implement procedures to safeguard and protect human health and the environment because food waste contains human pathogens, fungi and bacteria. The DEQ has regulations to address pathogen reduction at composting facilities that vary depending on the processing method used by the facility. To ensure that the finished product is safe to use, pathogen reduction procedures must be addressed in the facility operating plan.

The following are examples of two types of food waste processing systems that would be addressed in Metro's application process:

*Forced aeration composting system.* Most food waste processing systems include some form of composting that uses forced aeration with pumps that typically pull air through the pile core (negative aeration) and divert it to a biofilter to remove odors. In addition, facilities processing food waste typically cover compost piles with breathable fabrics or other equivalent products or structures to help contain malodors. Since covered and aerated composting systems are

known to effectively reduce the production of malodors, Metro considers these to be the minimum standard for composting facilities accepting the region's food waste. Alternatives to this composting method may be considered on a case-by-case basis and would depend on the details of the specific proposal, the type of material, processor experience and the site location.

*Passive pile or windrow composting.* Virtually all of the Metro region's five licensed yard debris composting facilities process large volumes of yard debris utilizing a passive composting system. Rather than a forced aeration system, compost piles or windrows are aerated when they are turned on a regular schedule using equipment such as a bucket loader or specialized turning machinery. This type of passive composting system is not suitable for managing large volumes of food waste, as the piles can quickly turn anaerobic and create malodors when they are turned. Existing Metro licensed yard debris facilities will need to obtain additional Metro authorization prior to accepting food waste. The facility design, operating and odor control plans will need to be updated to describe how the food waste will be managed to avoid anaerobic conditions and preclude the production of malodors that can be detected off-site.

*Anaerobic digestion systems.* Most anaerobic digestion systems are designed so that food wastes are processed inside an enclosed building and within an in-vessel system. Metro standards for anaerobic digestion systems are similar to composting facilities that receive and process food waste. In particular, the same standards apply for receiving waste, feedstock management, odor control, biofilters, leachate and stormwater management. In addition, biogas production and management would also need to be addressed (including methane and hydrogen sulfide). Pathogen reduction requirements would depend on the processing system and disposition of the by-products. Additional guidance will be provided to these facilities based on the proposed method of processing, operator experience and the facility site location.

#### Food Waste Reloading Facilities

Facilities that receive commercial food waste or residential food waste mixed with yard debris must consolidate, reload and transport these materials to a Metro authorized or designated facility or under authority of a Metro non-system license. In order to minimize the generation of malodors, food waste and food waste mixed with yard debris must be reloaded and taken to an off-site processing facility after it has been received – generally within 24 hours of receipt. Such reloading activities must be conducted inside a roofed structure that is enclosed on at least three sides (for additional odor management, a fourth side and a negative aeration system and biofilters should be considered in urban locations). Transport containers must have watertight seals and be covered. Leachate and stormwater must be managed in accordance with DEQ requirements (and/or applicable local requirements). Reloading food waste does not include processing activities such as sorting, grinding, composting or other feedstock preparation.

## V. Record Keeping & Reporting

Metro's regulatory authorizations and agreements allowing the acceptance of food waste will include record keeping and reporting requirements. Complete and accurate records must be kept for all transactions including the ticket or slip number, material category type, date the load was accepted, the net weight of the load, material origin, and the fee charged by the facility. Monthly records must be provided in an electronic format prescribed by Metro. These records provide a basis for regional solid waste planning, compliance, and monitoring operational activities.

## VI. Metro Fees & Taxes

Metro's Regional System Fee and Excise Tax (fees and taxes) are not currently paid on source-separated food waste that is delivered and successfully processed at a Metro-approved facility. However, waste that is not recovered, and is subsequently disposed, is subject to full fees and taxes. Metro's regulatory authorizations and agreements include the terms and conditions for when fees and taxes must be paid. For example, if the facility accepts food waste that does not meet its acceptance criteria or the facility fails to process the material as required, the facility would be liable for payment of fees and taxes for each ton of waste delivered to a solid waste disposal site.

## VII. Conclusion

In summary, facilities proposing to accept food waste from the Metro region must be able to address the performance goals and operating guidelines by submitting a facility design plan, a facility operating plan, and a comprehensive odor management plan as part of its application to Metro. Effective and reliable odor management controls are essential characteristics of a viable, sustainable and long-term food waste processing strategy for the Metro region.

### Questions or Concerns

If you have questions about the information in this regulatory guidance document or would like more information, please contact Bill Metzler, Senior Planner, Metro Finance and Regulatory Services, Solid Waste Compliance and Cleanup Program at 503-797-1666 or email at [bill.metzler@oregonmetro.gov](mailto:bill.metzler@oregonmetro.gov).

*This regulatory guidance bulletin is advisory only, and is intended to provide assistance in understanding certain Metro solid waste requirements. The information contained in the bulletin is not an administrative procedure, rule or performance standard as set forth in Metro Code Section 5.01.132.*

BM:bjl  
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**City of Portland, Oregon**  
**Bureau of Development Services**  
**Land Use Services**

FROM CONCEPT TO CONSTRUCTION

Dan Saltzman, Commissioner  
Paul L. Scarlett, Director  
Phone: (503) 823-7300  
Fax: (503) 823-5630  
TTY: (503) 823-6868  
[www.portlandoregon.gov/bds](http://www.portlandoregon.gov/bds)

July 27, 2011

**Memorandum**

TO: Portland City Council

FROM: Sheila Frugoli, Senior Planner, BDS Land Use Services *SP*

RE: LU 10-194818 CU AD: Recology's North Plains Facility - Record-Keeping and Monitoring

A letter of support for the project was sent to City Council from Melanie McCandless. In a follow-up e-mail to Commissioner Fritz, Ms. McCandless called attention to the opponents' website information which states that the North Plains site has had 69 odor complaints. Ms. McCandless states that most of the complaints were determined to not be associated with the Recology North Plains facility (also known as Nature's Needs).

Staff is submitting into the record information from Department of Environmental Quality staff, Stephanie Rawson. The information documents complaints received by the Recology North Plains facility since 2008. Ms. Rawson notes that Washington County documented the origin of many odor complaints was from a neighboring grain elevator company. DEQ also transmitted copies of letters that document Recology's response to odor complaints.

FROM CONCEPT TO CONSTRUCTION



**Frugoli, Sheila**

---

**From:** RAWSON Stephanie [Rawson.Stephanie@deq.state.or.us]  
**Sent:** Monday, July 25, 2011 3:47 PM  
**To:** Frugoli, Sheila  
**Cc:** Sperry, Arianne; RAWSON Stephanie  
**Subject:** RE: Rebuttal to Springwater Trail Preservation Society appeal of Recology Land Use Permit  
**Attachments:** 20100901-1445-VanDyke-26Aug2010SiteVisit-Odor.pdf; FW: Nature's Needs - Updated Information; Complaints\_ Nature's Needs.xlsx

Sheila,

The attached spreadsheet is the list of complaints received since April 2008, when Recology began operating Nature's Needs. The spreadsheet simply lists the date the complaint was received, when it was observed, and the comments from the complainant. I email you separately (due to size) several recent emails from Recology documenting their response to the received complaints.

As Ms. McCandless states below, Washington County Staff did document that the odor complained about was from the neighboring grain elevator company. DEQ has provided technical assistance to the grain elevator company. I have attached an email chain from Washington County indicating that this particular odor occurrence(s) were a result of the activities at the neighboring business and DEQ's site visit memo at the grain elevator company.

Let me know if you have any questions.

**Stephanie Rawson | Solid Waste Compliance**  
 Oregon DEQ | Northwest Region  
 2020 SW 4th Ave., Ste. 400, Portland, OR 97201  
 ☎ 503.229.5562 | [rawson.stephanie@deq.state.or.us](mailto:rawson.stephanie@deq.state.or.us)

*Messages to and from this e-mail address may be available to the public under Oregon Public Records Law.*



Is it necessary to print this e-mail?

---

**From:** Frugoli, Sheila [mailto:Sheila.Frugoli@portlandoregon.gov]  
**Sent:** Monday, July 25, 2011 2:40 PM  
**To:** RAWSON Stephanie  
**Cc:** Sperry, Arianne  
**Subject:** FW: Rebuttal to Springwater Trail Preservation Society appeal of Recology Land Use Permit

Stephanie,

See below. Does DEQ have record of the complaints/action taken for Recology's North Plains facility. Any further information/clarification would be helpful.

Thanks,

Sheila

---

**From:** Melanie McCandless [mailto:melanie.mccandless@gmail.com]  
**Sent:** Monday, July 25, 2011 7:14 AM  
**To:** Commissioner Fritz  
**Cc:** Frugoli, Sheila; Moore-Love, Karla  
**Subject:** RE: Rebuttal to Springwater Trail Preservation Society appeal of Recology Land Use Permit

Commissioner Fritz,

7/26/2011

Thank you for the opportunity for further comment. Should I direct others to include Ms. Frugoli and Ms. Moore-Love on any comments submitted? As I understand it, the deadline for public comment is this Wednesday 7/27 -- please let me know if that is correct.

The odor complaints at North Plains were discussed at Thursday's open community forum, and as I understand it, only a handful of the complaints were actually associated with Recology's operations; several of them may have been related to the grain silo storing fish meal at the same industrial site. I also learned on Thursday that Recology has added a negative airflow system (similar to the Foster Rd facility proposal, but perforated pipes directly underneath the windrows instead of a perforated concrete slab) earlier this year and has received no odor complaints since.

Additionally, we learned more details of the odor control biofilters proposed at the Foster Rd. facility. They were originally designed to remove volatile organic compounds (VOCs) from the air to protect the building; the odor control is an added benefit since the Recology staff did not expect any significant odor issues to begin with.

As I understand it, the biofilters will consist of wood chips inoculated with microorganisms; I've found some citations of other applications:

General overview: <http://en.wikipedia.org/wiki/Biofilter>

Use in wastewater treatment: [www.odor.net/images/Biofilters.pdf](http://www.odor.net/images/Biofilters.pdf)

Treatment of odors from swine farrowing house: [www.ipic.iastate.edu/reports/01swinereports/asl-1785.pdf](http://www.ipic.iastate.edu/reports/01swinereports/asl-1785.pdf)

Since the biofilter technology was effective at controlling odors associated with a swine facility -- which is more noisome than the proposed food compost material -- I am confident that there will be no odor concerns associated with Recology's Foster Rd. facility.

Thank you,  
--Melanie

On Sun, 2011-07-24 at 21:16 -0700, Commissioner Fritz wrote:

Dear Melanie,

Thank you for your thoughtful comments. I am copying the planner, Sheila Frugoli, and Council Clerk, Karla Moore-Love, to ensure your testimony is in the record.

You linked the [thisdoesntsmellright.org](http://thisdoesntsmellright.org) site, which states that Recology's North Plains site has received 69 odor complaints. Please comment for the record on this assertion and your opinion with regard to it, since odor control is one of the key approval criteria in the case. Comments are due this week (Sheila or Karla can tell you exactly when). Thank you for participating in this land use review.

Sincerely,

Amanda

Amanda Fritz

Commissioner, City of Portland

*The City of Portland is a fragrance free workplace. To help me and others be able to breathe, please avoid using added fragrances when visiting City offices.*

To help ensure equal access to City programs, services and activities, the City of Portland will reasonably modify policies/procedures and provide auxiliary aids/services to persons with disabilities. Call 503-823-2036, TTY 503-823-6868 with such requests or visit [http://www.portlandonline.com/ADA\\_Forms](http://www.portlandonline.com/ADA_Forms)

7/26/2011

State of Oregon  
Department of Environmental Quality

Memorandum

**To:** Van Dyke Grain Elevators, Inc.  
9620 NW 307<sup>th</sup> Avenue, North Plains  
Washington County

**Date:** September 1, 2010

**From:** Stephanie Rawson, Solid Waste Permitting and Compliance Specialist  
Patricia Huback, Air Quality Specialist

**Subject:** August 26, 2010 Site Visit

On Thursday August 26, 2010, Patricia Huback and I conducted a site visit at Van Dyke Grain Elevators, Inc. located at 9320 NW 307<sup>th</sup> Avenue in North Plains. Van Dyke's is located to the west of Nature's Needs, a DEQ permitted composting facility. The purpose of this site visit was to gain a better understanding of Van Dyke's operations in an effort to assist the company minimize their odors.

In July 2010, DEQ and Washington County received odor complaints with regard to Nature's Needs operations. While conducting complaint response inspections, Washington County Code Enforcement staff determined that the source of some of the received odor complaints was Van Dyke's, not Nature's Needs. In a recent DEQ site visit (August 5, 2010) to Nature's Needs, DEQ staff detected odors on westbound Highway 26 near Van Dyke's. DEQ staff determined the fishy odors detected were from Van Dyke's. The fishy odor was detected along NW 307<sup>th</sup> in front of Van Dyke's. The odor appeared to be coming from the open southern door in Building 1.

Patricia and I arrived at Van Dyke's at approximately 9:03 a.m. We met with Dan Van Dyke and Dave Van Domelen. Before walking around the facility we discussed Van Dyke's operations. Mr. Van Domelen escorted Patricia and me during the walk through of the facility.

Mr. Van Dyke explained that the grain elevator company was founded in 1962. The facility does not use silos but instead uses flat storage in two large buildings. Each building is approximately 47,000 square feet. The North Plains location is an intermediate facility used for storage and distribution of grains. Mr. Van Dyke said farmers bring in oats and wheat primarily in August and September. Van Dyke's also works with Wilbur Ellis to store and distribute their grains (lamb, fish, and venison meals) used to produce pet foods and other products.

At the time of the site visit Van Dyke's operations were not occurring. Van Dyke's was not accepting loads or loading trailers for shipment.

Mr. Van Domelen said the facility operations occur mostly inside the two buildings on site. Building 1 is used for storage of oats, wheat, and fish meal (salmon, tuna, etc.). Incoming loads of wheat and oats are unloaded in two outside pits along the westside of Building 1. As the oats and wheat are unloaded in the pits, the grains are moved inside Building 1 by grain elevators and

augers. Oats and wheat are unloaded in separate pits. Oats are unloaded in the north pit and wheat in the south pit.

The two pits are only used about 30 days out of the year. Spilled grain and water accumulate in the pits. Mr. Van Domelen said the pits are usually cleaned out right before harvest. A sump pump is used to remove spilled grains and accumulated water. Approximately 3-5 five gallons buckets of water are accumulated. This past July, the pits were not cleaned out as needed which resulted in saturated, moldy grains. The saturated, moldy grains created odors and were stockpiled on the east side of the property. Water that is removed from the pit is drained overland on the parking lot and infiltrates into the ground.

About two thirds of Building 1 is used for wheat storage. Oats are moved into bunkers after they are transported into the building by the grain elevator. Fish meal is stored in the northern third of the building separate from the wheat and oats.

The outbound trailers are loaded inside Building 1. During the loading of the outbound trailers the west and south doors are open to provide ventilation. The ceiling of Building 1 vents to provide additional ventilation.

Building 2 is used to store the ruminant materials such as lamb and venison meals. The ruminant materials are required by the Oregon Department of Agriculture to be stored separately from non-ruminant materials. The lamb and venison meals are stored separately inside the building. The unloading and loading of these meals occur inside the building. Depending on customer preference, the lamb meal is screened to remove contaminants such as metal and bone. The screened-out contaminants are disposed of in the facility trash. The venison meal is always delivered and stored in totes (large plastic super sacks).

Building 2 has four wind-driven ceiling fans for ventilation. There is one door in Building 2 which is frequently open. The door faces west.

Van Dyke's mixes Diatomaceous Earth with the grains as necessary. Diatomaceous Earth is used as a pesticide and as well as an anti-caking agent for grain storage. Mixing of grains and Diatomaceous Earth occurs inside the buildings.

#### **Recommendations:**

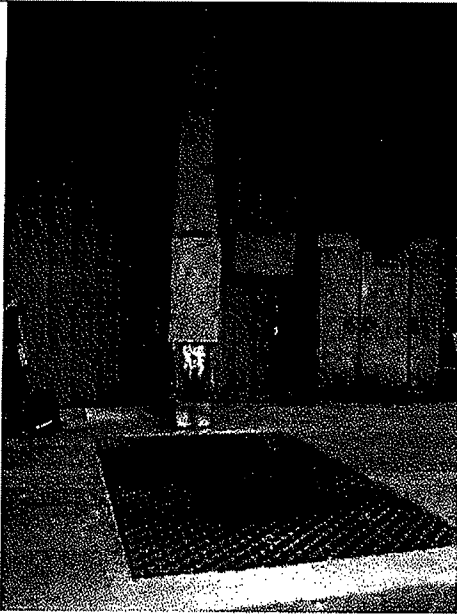
During the site visit odors were not detected outside the buildings. The fish meal in Building 1 has a strong odor associated with it. In the past, fish meal odors were detected outside the southern door in Building 1 and along Highway 26. Keeping facility operations indoors help to minimize odors. Below are recommendations to further minimize nuisance conditions:

- Keep doors closed as often as feasible to control blowing dust and odors;
- Wind appears to move through Building 1 when both doors are open and moves the fish meal odors out the southern door. Keep the southern door closed as often as possible;
- Consider weather conditions, such as temperatures and wind, when opening doors;
- Provide additional ventilation near the fish meal storage to prevent trapping odorous air from collecting so that odors are minimized once doors are opened;

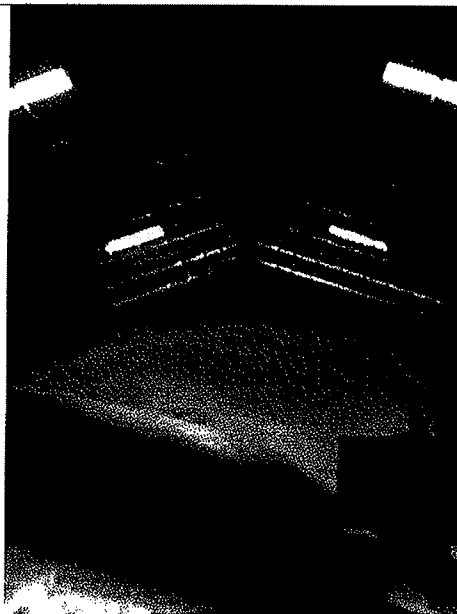
- Clean pits under grain elevators as often as needed;
- Pits are only used about 30 days of the year. Pits should be cleaned out before and after use;
- Do not let water accumulate in pits to the point the grains are moldy and an odor has developed; and
- Do not stockpile saturated grains from the pit; properly dispose of the saturated grains immediately.

**Photos:**

Below are photos from the walk through of the facility.



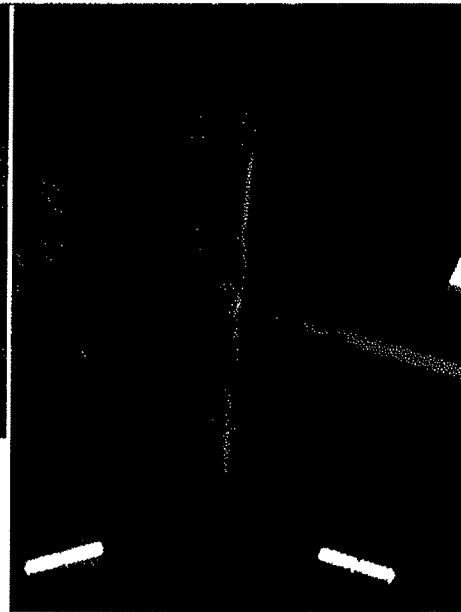
P8260001.JPG: Southern pit outside Building 1; facing East. Grate on the surface covers the pit where grains are unloaded. The black arrow points the grain elevator.



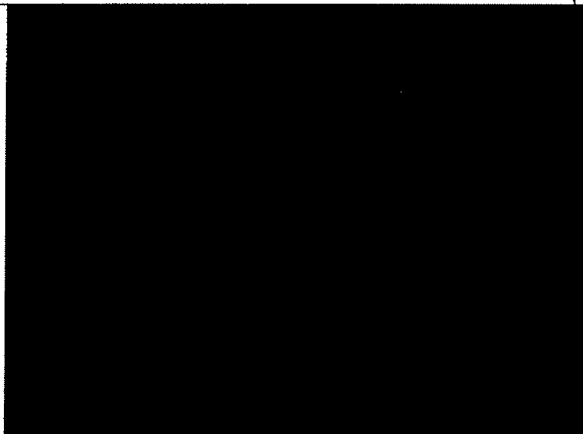
P8260003.JPG: The wheat stockpile in Building 1; facing South. The south facing door of Building 1 is on the other side of the wheat pile; note the four ceiling vents.



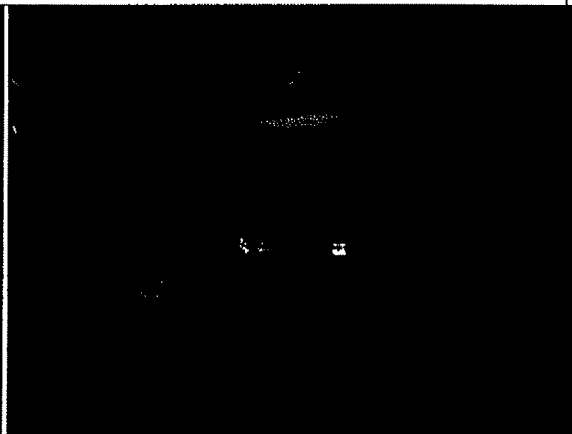
P8260005.JPG: Facing South from the fish meal storage area; wheat pile is in background. The west facing door in Building 1 is behind and to the right of the fish meal totes.



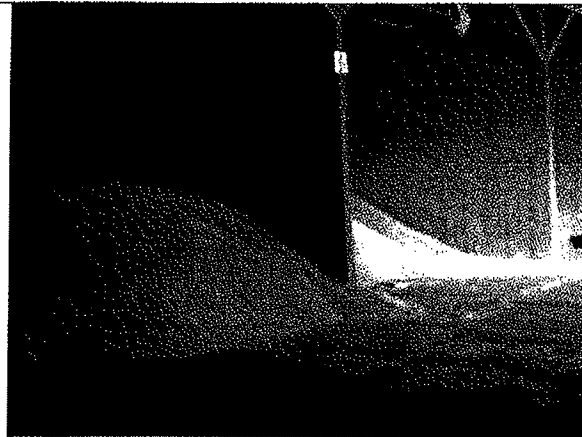
P8260009.JPG: Auger system that transports the grains from the grain elevator to inside Building 1.



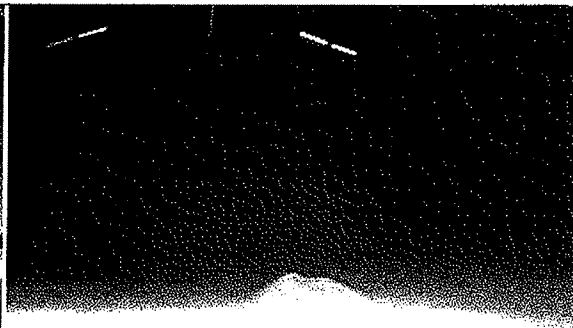
P8260006.JPG: Photo of the northeast corner of Building 1; tuna meal pile. (Photo was brightened to make visible.)



P8260007.JPG: West facing door at north end of Building 1



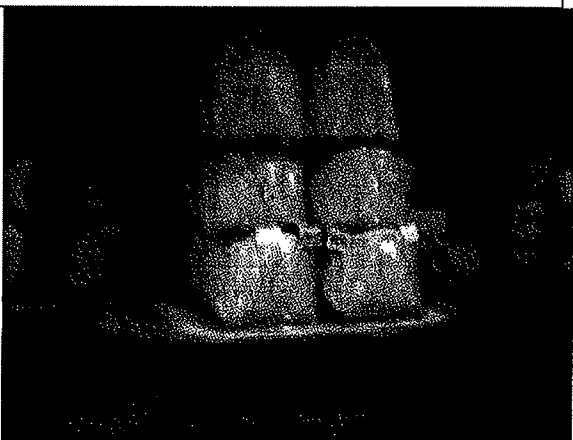
P8260011.JPG: Oat storage south of the fish meal storage in Building 1.



P8260012.JPG: Facing North into Building 1 from the southern door towards the wheat pile. Fishy odors have been detected emanating from this door in the recent past.



P8260013.JPG: Facing South from Building 1 southern door. White arrow points to Highway 26 and black arrow points to NW 307<sup>th</sup> Avenue.



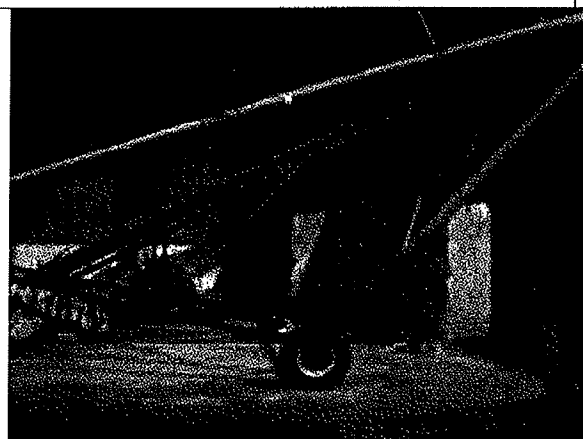
P8260015.JPG: Venison meal totes in Building 2. Building 2 is used for ruminant material storage only.



P8260018.JPG: Wind powered ceiling fan in Building 2 used for ventilation.



P8260020.JPG: Lamb meal storage in Building 2.



P8260021.JPG: Lamb meal screening operation in Building 2 and a pile of screened lamb meal.



Van Dyke's Grain Elevators August 26, 2010 Site Visit  
Washington County  
Page 7 of 7



Van Dyke's Grain Elevators (marked with balloon A) and Nature's Needs (to the east).. Source: Google Maps

**Frugoli, Sheila**

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**From:** Jerry Green [Jerry\_Green@co.washington.or.us]  
**Sent:** Tuesday, July 27, 2010 1:22 PM  
**To:** RAWSON Stephanie  
**Subject:** FW: Nature's Needs - Updated Information  
Stephanie,

I wanted to forward along this recent communication string with Don Otterman related to Nature's Needs. I thought it would be of interest to the DEQ team.

Jerry Green  
Program Coordinator  
Washington County  
Solid Waste & Recycling Program  
155 N. 1st Avenue, MS#5  
Hillsboro, OR 97124  
Phone: (503) 846-3665  
Fax: (503) 846-4490  
[jerry\\_green@co.washington.or.us](mailto:jerry_green@co.washington.or.us)  
[www.co.washington.or.us](http://www.co.washington.or.us)

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**From:** Jerry Green  
**Sent:** Tuesday, July 27, 2010 1:03 PM  
**To:** 'Don Otterman'  
**Cc:** Theresa Koppang  
**Subject:** RE: Nature's Needs - Updated Information

Don,

As a follow up to my email of yesterday, I wanted to provide you with some additional information related to the cleaning of the grain storage silos at Van Dyke Grain Elevator earlier this month. This additional information may provide some more insight to your inquiry about what caused the odor complaints the other days.

Kelee Hirn-Sheppard, one of our code enforcement officers, visited the Nature's Needs site today at approximately 9:30 a.m. as part of her ongoing program of random checks at Nature's Needs. During her visit, the NN site manager, Pedro, brought to her attention a large pile of decomposing seed material that had been piled near the western edge of the NN property. Kelee inspected the pile and determined that the pile was not on NN property but instead was on Van Dyke Grain Elevator property. As such, she inquired at Van Dyke Grain Elevator about this pile. Employees at Van Dyke indicated that this material was the slurry that had been pumped out of the bottom of the storage silo earlier in July. Accordingly, it appears that the material has been sitting in this location for over three weeks (since July 8). The material was malodorous, but did not emanate a strong odor. Kelee clarified that she had no authority over this material as it was inside the city limits of North Plains, but suggested that they may want to do something with the material due to the odor that was coming from it. In response, the employees from Van Dyke indicated that they would address the problem through an appropriate odor-mitigation treatment.

Please let me know if you need additional information related to this recent event.

Jerry Green

7/26/2011

Program Coordinator  
Washington County  
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[www.co.washington.or.us](http://www.co.washington.or.us)

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**From:** Jerry Green  
**Sent:** Monday, July 26, 2010 3:48 PM  
**To:** 'Don Otterman'  
**Cc:** Theresa Koppang  
**Subject:** RE: Nature's Needs

Don,

In response to your email dated July 23, 2010, the current franchise agreement calls for materials received to be placed into windrows by the end of the day received. Windrows are then to be covered immediately and remain covered for a period of at least 3 weeks except for when they are being turned.

In terms of other complaints, I refer you to the observation/complaint logs I routinely send out. The only recent complaints that we have been able to corroborate were linked to Van Dyke Grain. There was one other complaint that our code enforcement staff corroborated that was associated with fish meal on site. When the code enforcement officer stopped at Van Dyke he specifically smelled a "fishy" odor and confirmed with staff at Van Dyke that they were processing a load of fish meal.

Several of the odors reported in the complaints that have been filed were detected at the same time and in the same general location that County staff were present as part of our regular, random monitoring efforts. The reports filed by these staff, myself included, for those concurrent times and dates indicated that there were no mal odors detected at any of the several points which were monitored.

We will continue to provide you with the observation logs and you can track the findings related to both complaints and the regular monitoring of the site and surrounding vicinity of Nature's Needs.

Jerry Green  
Program Coordinator  
Washington County  
Solid Waste & Recycling Program  
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[www.co.washington.or.us](http://www.co.washington.or.us)

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**From:** Don Otterman [<mailto:don@northplains.org>]  
**Sent:** Friday, July 23, 2010 9:12 AM  
**To:** Jerry Green  
**Cc:** Theresa Koppang

7/26/2011

**Subject:** Nature's Needs

Jerry

I visited Nature's Needs yesterday and toured the operations. While I was there a large truck brought in yard debris and dumped it. We went up to the pile to see it closer and I noticed a strong odor of "dirty diapers", that is the best way to describe it. Pedro told me that it had not gone anaerobic, that was just the way it smelled. I could see how there could be complaints if several loads were received in a short period of time.

Are there any regulations regarding how fast the input has to be put in wind rows and covered?

I also talked with Dan Van Dyke at the grain facility. He told me about the issues with the underground storage facilities and that it took 4 days to clean them up. My question is what caused the odor complaints the other days? They had fish meal on site and it did not smell.

Again, I think it comes down to how much do we have to put up with. Maybe it does not meet the county's definition of a malodor, but it smells none the less.

There was an article in the Argus on July 16 regarding a facility in the Corvallis area. It does quote the operators of that facility saying that the type of use should not be in an urban area.

Don Otterman, City Manager  
City of North Plains  
31360 NW Commercial Street  
North Plains, OR 97133  
Phone: (503) 647-5555  
Fax: (503) 647-2031  
E-Mail: [Don@NorthPlains.org](mailto:Don@NorthPlains.org)  
Web Site: [www.northplains.org](http://www.northplains.org)

7/26/2011

Complaint	Date Received	Time Recd	Observed
NWR-2009-0153	06/11/2009	12:42	On Going
NWR-2009-0177	06/24/2009	8:27	June 23rd@5:00pm
NWR-2009-0305	07/16/2009	17:08	June 23rd@5:00pm
NWR-2009-0306	07/23/2009	15:01	today@2:41p
NWR-2009-0315	08/03/2009		7/29/09 8:00 pm
NWR-2009-0316	08/03/2009		7/30/09 6:50 pm
NWR-2009-0317	08/03/2009		7/31/09 10:30 pm
NWR-2009-0318	08/03/2009		8/1/09 10:45 pm
NWR-2009-0324	08/19/2009	8:50	8:30 AM
NWR-2009-0325	08/24/2009	11:50	8/29 6:09 PM
NWR-2009-0345	08/31/2009	17:45	8/31 6:25 AM
NWR-2009-0526	12/15/2009	13:19	12/15/09
NWR-2009-0530	12/16/2009		12/15/09 14:38
NWR-2009-0531	12/16/2009		12/15/09 21:45
NWR-2010-0003	12/28/2009		12/27/2009 6:40 pm
NWR-2010-0004	12/28/2009		12/28/2009 4:45 pm
NWR-2010-0375	05/13/2010	8:30	now
NWR-2010-0378	05/17/2010	12:00	5/14/10 @ 4:50p
NWR-2010-0453	05/27/2010		5/26 10:30 pm
NWR-2010-0422	06/04/2010	12:00	6/4/10@4:22p
NWR-2010-0454	06/11/2010		6/11 3:15 pm
NWR-2010-0456	06/22/2010		6/22 8:30 pm
NWR-2010-0455	06/22/2010		6/22 1:53 pm
NWR-2010-0457	06/23/2010		Past 3 wks
NWR-2010-0486	06/25/2010	15:45	
NWR-2010-0461	06/25/2010		various days
NWR-2010-0491	06/26/2010	14:25	
NWR-2010-0492	06/28/2010	17:45	
NWR-2010-0476	06/30/2010	13:22	on going
NWR-2010-0487	06/30/2010	16:50	
NWR-2010-0488	07/02/2010	13:56	
NWR-2010-0489	07/02/2010	13:52	
NWR-2010-0596	07/03/2010	20:22	
NWR-2010-0490	07/06/2010	16:00	
NWR-2010-0493	07/07/2010		
NWR-2010-0494	07/12/2010	11:50	

NWR-2010-0523	07/23/2010		
NWR-2010-0524	07/23/2010		16:02
NWR-2010-0531	07/29/2010	15:45	
NWR-2010-0716	09/13/2010	8:40	
NWR-2010-0779	09/23/2010	22:00	10 pm to 7 am
NWR-2010-0780	09/24/2010	7:30	
NWR-2011-0082	02/03/2011		6:16 pm
NWR-2011-0384	05/13/2011	13:10	
NWR-2011-0385	05/13/2011	8:00	AM & PM
NWR-2011-0386	05/20/2011	7:30	
NWR-2011-0387	05/24/2011	17:18	
NWR-2011-0389	05/26/2011	8:37	
NWR-2011-0388	05/26/2011	7:39	
NWR-2011-0409	06/06/2011	9:00	before church
NWR-2011-0410	06/06/2011	17:30	
NWR-2011-0427	06/09/2011	18:40	
NWR-2011-0444	06/15/2011	16:19	
NWR-2011-0459	06/20/2011	8:39	
NWR-2011-0463	06/20/2011	16:00	
NWR-2011-0462	06/21/2011	8:00	
NWR-2011-0476	06/21/2011	7:00	
NWR-2011-0478	06/21/2011	18:24	
NWR-2011-0477	06/22/2011	7:00	
NWR-2011-0530	07/05/2011	8:00	
NWR-2011-0529	07/05/2011	8:00	

Description
Offensive Odors
Offensive Odors
A citizen complained regarding a very strong odor right now and very strong smell yesterday morning she was on Hwy 26 across from the Nature's Needs
Passer-by on Hwy 26 just called and said the smell was very bad and it smelled as if something was dead 2:41p
Complainant noticed "really bad odors" while driving. Complaint relayed by City of N Plains.
Complainant noticed "really bad odors" while driving. Complaint relayed by City of N Plains.
Complainant noticed "really bad odors" while driving. Complaint relayed by City of N Plains.
Complainant noticed "really bad odors" while driving. Complaint relayed by City of N Plains.
Anonymous odor complaint, relayed by City of North Plains
Relayed by City of North Plains: "Citizen complained of really bad odors while driving."
Relayed by City of North Plains: "Citizen complained of really bad odors from location here in town, around 6:25
Sour/vinegary odor. Complaint relayed by Washington County Solid Waste & Recycling prog.
"Chemical" odor--"putrid/acid." Complaint relayed by Washington County SW Dept--City of North Plains.
"Chemical" odor--"putrid/acid." Complaint relayed by Washington County SW Dept--City of North Plains.
"Rotten garbage" odor
"Garbage" odor
can smell them from parking lot of City Hall
"Chemical" odor--"putrid/acid." Complaint relayed by Washington County SW Dept--City of North Plains.
Pungent, putrid, fishy
"Chemical" odor--"putrid/acid." Complaint relayed by Washington County SW Dept--City of North Plains.
"pungent"
Rotting garbage
Rotten
Sour/vinegary
Odor like "dirty diapers;" complainant says "have inspected site--smells like the odor control berm not working --
"Rotten garbage"
"Drove around to verify smell"
"Compost pile--turned--no odor control working--biofilter not effective"
Odor of "dirty diapers"
"Pungent"
"Repeat odors. Fear it will get worse. North Plains stinks!"
"Rotten garbage"
"Recology is reeking again"
Rotten garbage, uncontrolled compost odor
Dirty diapers
Woody, skunky, dirty diapers
Just a reminder the smell still exists
"Foul, nasty, nasty, strong!"
"Skunky, woody"
"Like odor control not working. Smells not as strong as in past but definitely nasty."
"rotten mulch"
"bad but has been worse"

Woody, nasty, pungent, "dirty diapers." Other dates noted:
7/14/10 15:45
7/15/10 06:20
7/15/10 15:40
7/16/10 17:50
7/19/10 15:45
7/20/10 18:24
7/21/10 18:20
7/22/10 15:45
"Ongoing serious problem--Biofilter (odor control) not working--need better control."
"Hot NASTY smell all its own"
Really ripe today--dirty diapers
Sour/vinegary
Sweet sickly heavy odor.
Sweet sickly heavy odor.
Bad smell. Usually at night when you cannot make a complaint.
Just stinks!
Reported odor in AM n way to work & PM on way home from work--LEFT MSG.
Already called DEQ and spoke with Stephanie Rawson. Spoke with Jessica at Recology
Cheri called this morning (approx 9 AM) and spoke with Jessica.
Rotting trash odor
Especially strong this morning
Odor very strong.
Odor very strong.
Full of ROT!
Stinks
Stinks!
Really bad at 4 PM
Bad at 6:40 PM
Nature's Needs stink in air
Smells bad coming up the hill
Bad!
Smells bad coming up the hill
Odor description: Putrid/fishy, standard Nature's Needs odor.
Odor described as "'throw-up,' hideous, unacceptable!" Odor perceived "home this morning, everywhere




**Frugoli, Sheila**

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**From:** RAWSON Stephanie [Rawson.Stephanie@deq.state.or.us]  
**Sent:** Monday, July 25, 2011 3:49 PM  
**To:** Frugoli, Sheila  
**Cc:** Sperry, Arianne; RAWSON Stephanie  
**Subject:** RE: Rebuttal to Springwater Trail Preservation Society appeal of Recology Land Use Permit  
**Attachments:** Revised Odor Complaint Letter; Odor complaint response letter ; Odor Complaint Response  
Attached are examples of how Recology has responded to odor complaints at Nature's Needs.

Stephanie Rawson | Solid Waste Compliance  
Oregon DEQ | Northwest Region  
2020 SW 4th Ave., Ste. 400, Portland, OR 97201  
☎ 503.229.5562 | [rawson.stephanie@deq.state.or.us](mailto:rawson.stephanie@deq.state.or.us)

*Messages to and from this e-mail address may be available to the public under Oregon Public Records Law.*

 Is it necessary to print this e-mail?

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**From:** Frugoli, Sheila [mailto:Sheila.Frugoli@portlandoregon.gov]  
**Sent:** Monday, July 25, 2011 2:40 PM  
**To:** RAWSON Stephanie  
**Cc:** Sperry, Arianne  
**Subject:** FW: Rebuttal to Springwater Trail Preservation Society appeal of Recology Land Use Permit

Stephanie,

See below. Does DEQ have record of the complaints/action taken for Recology's North Plains facility. Any further information/clarification would be helpful.

Thanks,

Sheila

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**From:** Melanie McCandless [mailto:melanie.mccandless@gmail.com]  
**Sent:** Monday, July 25, 2011 7:14 AM  
**To:** Commissioner Fritz  
**Cc:** Frugoli, Sheila; Moore-Love, Karla  
**Subject:** RE: Rebuttal to Springwater Trail Preservation Society appeal of Recology Land Use Permit

Commissioner Fritz,

Thank you for the opportunity for further comment. Should I direct others to include Ms. Frugoli and Ms. Moore-Love on any comments submitted? As I understand it, the deadline for public comment is this Wednesday 7/27 -- please let me know if that is correct.

The odor complaints at North Plains were discussed at Thursday's open community forum, and as I understand it, only a handful of the complaints were actually associated with Recology's operations; several of them may have been related to the grain silo storing fish meal at the same industrial site. I also learned on Thursday that Recology has added a negative airflow system (similar to the Foster Rd facility proposal, but perforated pipes directly underneath the windrows instead of a perforated concrete slab) earlier this year and has received no odor complaints since.

Additionally, we learned more details of the odor control biofilters proposed at the Foster Rd. facility. They were originally designed to remove volatile organic compounds (VOCs) from the

7/26/2011

air to protect the building; the odor control is an added benefit since the Recology staff did not expect any significant odor issues to begin with.

As I understand it, the biofilters will consist of wood chips inoculated with microorganisms; I've found some citations of other applications:

General overview: <http://en.wikipedia.org/wiki/Biofilter>

Use in wastewater treatment: [www.odor.net/images/Biofilters.pdf](http://www.odor.net/images/Biofilters.pdf)

Treatment of odors from swine farrowing house: [www.ipic.iastate.edu/reports/01swinereports/asl-1785.pdf](http://www.ipic.iastate.edu/reports/01swinereports/asl-1785.pdf)

Since the biofilter technology was effective at controlling odors associated with a swine facility -- which is more noisome than the proposed food compost material -- I am confident that there will be no odor concerns associated with Recology's Foster Rd. facility.

Thank you,  
--Melanie

On Sun, 2011-07-24 at 21:16 -0700, Commissioner Fritz wrote:  
Dear Melanie,

Thank you for your thoughtful comments. I am copying the planner, Sheila Frugoli, and Council Clerk, Karla Moore-Love, to ensure your testimony is in the record.

You linked the [thisdoesntsmellright.org](http://thisdoesntsmellright.org) site, which states that Recology's North Plains site has received 69 odor complaints. Please comment for the record on this assertion and your opinion with regard to it, since odor control is one of the key approval criteria in the case. Comments are due this week (Sheila or Karla can tell you exactly when). Thank you for participating in this land use review.

Sincerely,

Amanda

Amanda Fritz

Commissioner, City of Portland

*The City of Portland is a fragrance free workplace. To help me and others be able to breathe, please avoid using added fragrances when visiting City offices.*

To help ensure equal access to City programs, services and activities, the City of Portland will reasonably modify policies/procedures and provide auxiliary aids/services to persons with disabilities. Call 503-823-2036, TTY 503-823-6868 with such requests or visit [http://www.portlandonline.com/ADA\\_Forms](http://www.portlandonline.com/ADA_Forms)

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From: Melanie McCandless [mailto:[melanie.mccandless@gmail.com](mailto:melanie.mccandless@gmail.com)]

Sent: Thursday, July 21, 2011 10:39 AM

To: Adams, Sam; Commissioner Fritz; Commissioner Fish; Leonard, Randy; Commissioner Saltzman

Subject: Rebuttal to Springwater Trail Preservation Society appeal of Recology Land Use Permit

Hello,

I am a Lents resident and member of the community group Green Lents. Green Lents' role is to promote education, volunteerism, and leadership opportunities for sustainable actions in Lents and

7/26/2011

outer SE Portland. The following comments are from me as an individual and do not represent all of Green Lents. Green Lents' stance is summarized here:

<http://www.greenlents.com/9/post/2011/07/composting-in-portland-the-lents-recology-debate.html>

Personally, I am in support of Recology's land use permit request to process compostable food scraps at their Foster Rd location. Below is the form letter generated by the (newly incorporated, heavily-funded, non-representative) group "Springwater Trail Preservation Society" owners of [thisdoesntsmellright.org](http://thisdoesntsmellright.org) and my comments thereupon.

I urge you to recognize that this group does NOT represent Lents and they shouldn't be allowed to overrun the public process with their attorneys & PR scare tactics.

Sincerely,  
--Melanie McCandless  
8819 SE Ellis St #8  
LENTS, 97266

Dear Mayor Adams and Commissioners,

I wanted to bring to your attention a critically important matter that the council will be considering at your upcoming meeting on July 13. Neighbors in the Lents community

They have not been part of any neighborhood events prior to this (to my knowledge). And, not many 'neighbors in the Lents community' have the sort of \$ needed to run this campaign.

recently appealed a Conditional Use Permit and Adjustment that was granted to Recology back in April. This permit allows Recology to process rotten food and other wet waste at its facility on Southeast 101st, a site fully surrounded by neighborhoods, parks, a major bike path, and other important assets to our community.

The greater Freeway Lands Company site could meet this description, but Recology's only leasing a part of the land. They will be surrounded by other *industrial businesses*, not a pristine environment as they imply.

You have the opportunity to put a stop to Recology's outrageous plans.

Recycling food waste and yard debris is certainly a positive way to cut down on the large volumes of garbage produced each day; however, it is not appropriate to allow this type of facility to operate in the middle of a metropolitan area. The putrid odors of rotting meat and decomposing food scraps will be unbearable for local neighbors and will cause our home values to decline substantially.

This is purely speculative hyperbole. The additional operations at Recology's facilities are unlikely to have a significant change in the impact of the other industrial land uses on the Freeway Lands site (in my opinion).

With an estimated four hundred trips in and out of Recology's plant each day,

As I understand it, this is the maximum number of trips that the site could handle --

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NOT the expected number of trips. Again, they are using hyperbole to scare people into reactionary opposition.

neighborhood children and bicyclists using the Springwater Trail will be put at risk.

As a cyclist who has commuted out to Gresham via the Springwater Trail for the past three years, I can absolutely say that the 10st crossing is one of the safest. In fact, it is the *only* crossing where vehicles have always given me the right-of-way. This argument is nonsense and indicates to me that none of these people spend a significant amount of time on the Springwater Trail.

Noise and pollution are also concerns of ours.

Recology has a history of operating outside environmental standards

No citation is given.

and we are worried that our community will be infested with flies, rats, and other disease-carrying vermin.

This will be addressed by DEQ. I know that DEQ has had a proactive and firm inspection program operating on the Freeway Lands site and I trust them to do their job. This is outside the scope of a land use permit.

Additionally, the proposed site is located in the flood plains of Johnson Creek.

According to FEMA, it's not in the 100 yr floodplain. See attached -- it's the most recent fema map overlaid on google's satellite imagery.

Contamination from runoff on rainy days is a minor concern when you consider the pollution that neighborhoods and parks will suffer from the next time Johnson Creek floods.

Clearly Recology's plans pose a variety of environmental, health, and public safety concerns to the entire community surrounding the site. We are passionate about protecting our neighborhood

Usually, passionate people would find other ways to be involved -- like volunteering on the land use committee of the neighborhood association -- yet I have seen none of these people before. They actually berated David Hyde, our land-use chair, publicly at the last LNA general meeting.

and will not stand to be taken advantage of by an out of state company that doesn't respect the livability of the local community. That is why we are asking for your help, as our elected leaders, to put a stop to Recology's plans to stink up our community and deny their permit.

In summary, please approve Recology's permits since the claims made by this NIMBY group are invalid.



May 16, 2011

Mr. Jerry Green  
Program Coordinator  
Washington County Solid Waste and Recycling  
155 N First Ave, Suite 160, MS-5  
Hillsboro, OR 97124

Re: Odor Complaints Received May 13, 2011 and May 16, 2011

Dear Mr. Green,

This letter is in response to two recently received odor complaints.

The first complaint was received on May 13, 2011, filed by Mr. Charles Rogers. The complaint filed by Mr. Rogers indicates that an offensive odor was detected while "driving by on Highway 26" at 1:10 PM. An investigation of the complaint was conducted as detailed on the attached Odor Complaint Investigation Form (attached). At the time of the complaint, the wind direction was variable, with a wind speed of approximately 3.5 mph, as shown on the Hourly Observations Log (attached). The description of the odor given by Mr. Rogers was vague, only saying that it "just stinks."

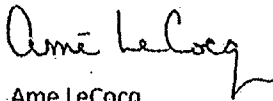
Site Supervisor Pedro Campuzano conducted a physical assessment of the conditions onsite at the time the complaint was received. Odors were detected within the immediate surrounding areas of the active windrows, however, these odors were not detectable once Mr. Campuzano traveled away from the area. No odors from the composting process were detected offsite by Mr. Campuzano.

The second complaint was received on May 16, 2011 at 8:53 AM, filed by Ms. Cheri Olson. The complaint filed by Ms. Olson indicates that an odor was detected while "on the way to and from work in North Plains" on May 13, 2011, however no specific time was indicated (see attached). Since this complaint was not received until three days after the alleged odor was detected, and no specific descriptors were given to describe the odor, it is difficult for site staff to confirm the odor was generated by Nature's Needs.

Over the past three weeks the facility has been in transition, as construction of leachate collection systems (catch basins) were installed. During this period, procedures were implemented to minimize the possibility of odors escaping the facility. We believe that our efforts have been successful so far.

Recology Oregon Compost will continue to minimize the potential for the generation and migration of odors. Odor minimization is one of the main objectives of any further site development. Recology is committed to resolving all nuisance odor conditions. Please contact me at (503) 226-6161 if you have any questions or require further information.

Sincerely,



Ame LeCocq  
Regional Environmental Compliance Manager  
Recology Oregon Compost  
Nature's Needs

Cc: Stephanie Rawson, Oregon DEQ

Attachments: Washington County Odor Compliant Forms  
Natures Needs Odor Complaint Investigation Forms  
Weather data

## **Odor Complaint Investigation Form**

### **Nature's Needs Compost Facility**

**Date of Complaint:** 5/13/11

**Time of Complaint:** 1:10 pm (complaint faxed to Nature's Needs at 1:01 pm)

**Microclimate Conditions:** (see attached sheet)

**Name of Person Filing Complaint:** Charles Rogers

**Phone Number:** (503) 429-9107

**Location of Nuisance:** 31360 NW Commercial St., North Plains

**Discussion (Include time of occurrence):** We received a call from Stephanie Rawson of DEQ, she informed us that North Plains City Hall faxed a Complaint Form issued by Charles Rogers. Charles Rogers did not specify a specific odor description, just stated that it "just stinks" when he was driving by on Hwy 26 at 1:10 pm. When ROC Nature's Needs Site Supervisor Pedro Campuzano was notified of the complaint he walked around the active windrows to assess the area. Pedro determined that the odors near the active windrows dissipated as he walked away from the active windrow area & moved towards the highway.

**Determination by site Personnel:** It was determined that the odors in the active windrow area were not anaerobic & were not detected near Hwy 26.

**Is Nature of Odor Short or Long Term?** N/A. The nature of the odor is undetermined.

**If Odor is Evident, What Steps Will be Taken to Reduce Odors?** There is no evidence of anaerobic conditions on site. Incoming feed stock unloaded onto the tipping pad is processed in a timely manner to minimize any anaerobic bacteria that may be present in the feedstock.

Additionally, there is also a pile of a carbon source (wood chips) near the tipping area available for immediate use to incorporate into an incoming load of feedstock if it contains a high concentration of nitrogen (grass clippings). The added carbon base creates a more porous environment increasing aeration & promoting the growth of beneficial bacteria, offsetting the growth of anaerobic bacteria.

Had there been any anaerobic activity present on site the source would be identified, marked, & additional procedures would be implemented to increase the growth of beneficial aerobic bacteria.



## WASHINGTON COUNTY, OREGON Solid Waste and Recycling Program

### ODOR COMPLAINT FORM

(This form is to be used for receiving any and all complaints that may be related to offensive odors.  
Please forward all such complaints to the Office of the Washington County Solid Waste and Recycling Program and  
to the Nature's Needs Composting Facility as noted below.)

Date Complaint Received: 5/13/11

Date Offensive Odor Detected by Complainant: 5/13/11

Time of day Offensive Odor detected: 1:10 ☐ a.m. ☒ p.m.

Name of Person Filing Complaint: Charles Rogers

Telephone Number of Person Filing Complaint: (503) 429-9107

Address of Person Filing Complaint: 31360 NW Commercial NP

Location of Offensive Odor: Driving by on Hwy 26

Description of the Odor: ☐ Sour/vinegary ☐ Putrid/fishy ☐ Woody  
☐ Rotten eggs ☐ Skunky ☐ Piney/musty  
☐ Other: Please specify \_\_\_\_\_

Other Information: Just stinks.

**Please file complaint with both of the following offices:**

Nature's Needs Composting Facility fax number: (503) 647-8485

Washington County Solid Waste fax number: (503) 846-4490

155 N. First Street, MS 5 • Hillsboro, OR 97124  
Phone: (503) 846-8609 • Fax: (503) 846-4490, [www.co.washington.or.us](http://www.co.washington.or.us)  
[www.recyclewisec.org](http://www.recyclewisec.org)



## Hourly Observations:

Time (PDT)	Temp.	Dew Point	Humidity	Sea Level Pressure	Visibility	Wind Dir	Wind Speed	Gust Speed	Precip	Events	Conditions
12:53 AM	44.1 °F	39.9 °F	85%	30.27 in	10.0 miles	West	3.5 mph		N/A		Clear
1:53 AM	43.0 °F	39.0 °F	86%	30.26 in	10.0 miles	WNW	4.6 mph		N/A		Clear
3:53 AM	39.9 °F	37.9 °F	93%	30.24 in	10.0 miles	Calm	Calm		N/A		Clear
4:53 AM	41.0 °F	37.9 °F	80%	30.22 in	10.0 miles	Calm	Calm		N/A		Clear
5:53 AM	41.0 °F	37.9 °F	80%	30.19 in	10.0 miles	Calm	Calm		N/A		Clear
6:53 AM	44.1 °F	39.0 °F	82%	30.16 in	10.0 miles	Calm	Calm		N/A		Clear
8:53 AM	48.9 °F	41.0 °F	74%	30.12 in	10.0 miles	Calm	Calm		N/A		Clear
9:53 AM	53.1 °F	43.0 °F	69%	30.08 in	10.0 miles	Variable	6.9 mph		N/A		Clear
10:53 AM	57.9 °F	43.0 °F	58%	30.04 in	10.0 miles	NW	8.1 mph		N/A		Partly Cloudy
11:53 AM	62.1 °F	39.9 °F	44%	29.99 in	10.0 miles	Calm	Calm		N/A		Partly Cloudy
12:53 PM	66.0 °F	37.9 °F	36%	29.97 in	10.0 miles	Variable	3.5 mph		N/A		Scattered Clouds
1:53 PM	68.0 °F	39.8 °F	36%	29.94 in	10.0 miles	Variable	3.5 mph		N/A		Mostly Cloudy
2:53 PM	69.1 °F	39.9 °F	35%	29.92 in	10.0 miles	Variable	3.5 mph		N/A		Scattered Clouds
3:53 PM	71.1 °F	37.9 °F	30%	29.89 in	10.0 miles	Variable	3.5 mph		N/A		Clear
4:53 PM	72.0 °F	39.0 °F	30%	29.87 in	10.0 miles	ENE	5.8 mph		N/A		Partly Cloudy

## **Odor Complaint Investigation Form**

### **Nature's Needs Compost Facility**

**Date of Complaint:** 5/13/11

**Time of Complaint:** No specific time specified (complaint faxed to Nature's Needs 5/16/11)

**Microclimate Conditions:** (see attached sheet)

**Name of Person Filing Complaint:** Cheri Olson

**Phone Number:** (503) 647-0899

**Location of Nuisance:** 31360 NW Commercial St., North Plains

**Discussion (Include time of occurrence):** We received the Odor Complaint Form submitted by Cheri Olson via fax from North Plains City Hall on 5/16/11 at 8:53 am. Cheri Olson did not specify a specific odor description or any specific time frame. She reported an odor on her way to work in the am & on her way home from work in the pm.

On 5/13/11 ROC Nature's Needs Site Supervisor Pedro Campuzano was notified of a previous complaint submitted Charles Rogers (please see Odor Investigated 5/13/11 Charles Rogers). That afternoon, when he was notified, Pedro walked around the active windrows to assess the area. He determined that odors near the active windrows dissipated as he walked away from the active windrow area.

When notified of Cheri's odor complaint Pedro drove the loop around North Plains (Glencoe Rd- West Union Rd-Jackson School Rd- & both W. & N. bound on Hwy 26 between the Jackson School Rd. & North Plains exit). He did not detect any mal odors. At 9:15 am this morning we also received a visit from Kelee Him-Sheppard, Wa. County Code Enforcement Officer. She noted that there were no mal odors as she drove onto the Nature's Needs site.

**Determination by site Personnel:** On 5/13/11 it was determined that the odors in the active windrow area were not anaerobic & dissipated as you moved away from the area.

**Is Nature of Odor Short or Long Term?** N/A. Due to the lack of detail & late processing it would be difficult to determine the nature of odor.

**If Odor is Evident, What Steps Will be Taken to Reduce Odors?** There is no evidence of anaerobic conditions on site. Incoming feed stock unloaded onto the tipping pad is processed in a timely manner to minimize any anaerobic bacteria that may be present in the feedstock.

Additionally, there is also a pile of a carbon source (wood chips) near the tipping area available for immediate use to incorporate into an incoming load of feedstock if it contains a high concentration of

nitrogen (grass clippings). The added carbon base creates a more porous environment increasing aeration & promoting the growth of beneficial bacteria, offsetting the growth of anaerobic bacteria.

Had there been any anaerobic activity present on site the source would be identified, marked, & additional procedures would be implemented to increase the growth of beneficial aerobic bacteria



## WASHINGTON COUNTY, OREGON

### Solid Waste and Recycling Program

#### ODOR COMPLAINT FORM

(This form is to be used for receiving any and all complaints that may be related to offensive odors. Please forward all such complaints to the Office of the Washington County Solid Waste and Recycling Program and to the Nature's Needs Composting Facility as noted below.)

Date Complaint Received: 5/16/11

Date Offensive Odor Detected by Complainant: 5/13/11

Time of day Offensive Odor detected: \_\_\_\_\_ ☒ a.m. ☒ p.m.

Name of Person Filing Complaint: Cheer Olson

Telephone Number of Person Filing Complaint: (503) 647-0899

Address of Person Filing Complaint: 31118 NW Commercial  
North Plains, OR 97133

Location of Offensive Odor: On way to & from work in North Plains

Description of the Odor: ☐ Sour/vinegary ☐ Putrid/fishy ☐ Woody  
☐ Rotten eggs ☐ Skunky ☐ Piney/musty  
☐ Other: Please specify \_\_\_\_\_

Other Information: Reported odor in AM on way to work  
& in P.M. on way home from work - left msg.

Please file complaint with both of the following offices:

Nature's Needs Composting Facility fax number: (503) 847-9485

Washington County Solid Waste fax number: (503) 846-4490

165 N. First Street, MS S • Hillsboro, OR 97124  
Phone: (503) 846-8609 • Fax: (503) 846-4490, [www.co.washington.or.us](http://www.co.washington.or.us)  
[www.recyclewco.org](http://www.recyclewco.org)

Time (PDT)	Temp.	Dew Point	Humidity	Sea Level Pressure	Visibility	Wind Dir	Wind Speed	Gust Speed	Precip	Events	Conditions
12:53 AM	44.1 °F	39.0 °F	85%	30.27 in	10.0 miles	West	3.6 mph		N/A		Clear
1:53 AM	43.0 °F	39.0 °F	86%	30.26 in	10.0 miles	WNW	4.6 mph		N/A		Clear
3:53 AM	39.9 °F	37.0 °F	93%	30.24 in	10.0 miles	Calm	Calm		N/A		Clear
4:53 AM	41.0 °F	37.9 °F	89%	30.22 in	10.0 miles	Calm	Calm		N/A		Clear
5:53 AM	41.0 °F	37.9 °F	89%	30.19 in	10.0 miles	Calm	Calm		N/A		Clear
6:53 AM	44.1 °F	39.0 °F	82%	30.18 in	10.0 miles	Calm	Calm		N/A		Clear
8:53 AM	48.0 °F	41.0 °F	74%	30.12 in	10.0 miles	Calm	Calm		N/A		Clear
9:53 AM	63.1 °F	43.0 °F	69%	30.08 in	10.0 miles	Variable	6.9 mph		N/A		Clear
10:53 AM	67.9 °F	43.0 °F	68%	30.04 in	10.0 miles	NW	6.1 mph		N/A		Partly Cloudy
11:53 AM	62.1 °F	39.9 °F	44%	29.99 in	10.0 miles	Calm	Calm		N/A		Partly Cloudy
12:53 PM	68.0 °F	37.0 °F	35%	29.97 in	10.0 miles	Variable	3.6 mph		N/A		Scattered Clouds
1:53 PM	68.0 °F	39.9 °F	36%	29.94 in	10.0 miles	Variable	3.6 mph		N/A		Mostly Cloudy
2:53 PM	69.1 °F	39.9 °F	35%	29.92 in	10.0 miles	Variable	3.6 mph		N/A		Scattered Clouds
3:53 PM	71.1 °F	37.9 °F	30%	29.89 in	10.0 miles	Variable	3.6 mph		N/A		Clear
4:53 PM	72.0 °F	39.0 °F	30%	29.87 in	10.0 miles	ENE	5.8 mph		N/A		Partly Cloudy
5:53 PM	69.1 °F	44.1 °F	40%	29.86 in	10.0 miles	ENE	4.6 mph		N/A		Mostly Cloudy
6:53 PM	69.9 °F	46.0 °F	47%	29.85 in	10.0 miles	Calm	Calm		N/A		Mostly Cloudy
7:53 PM	62.1 °F	46.9 °F	58%	29.86 in	10.0 miles	WNW	18.4 mph		N/A		Overcast
8:53 PM	67.9 °F	45.0 °F	62%	29.88 in	10.0 miles	WNW	19.8 mph		N/A		Overcast
9:53 PM	66.9 °F	43.0 °F	62%	29.90 in	10.0 miles	WNW	9.2 mph		N/A		Overcast
10:53 PM	63.1 °F	43.0 °F	69%	29.88 in	10.0 miles	West	9.2 mph		N/A		Clear
11:53 PM	63.1 °F	43.0 °F	69%	29.87 in	10.0 miles	WNW	10.4 mph		N/A		Clear



June 17, 2011

Mr. Jerry Green  
Program Coordinator  
Washington County Solid Waste and Recycling  
155 N First Ave, Suite 160, MS-5  
Hillsboro, OR 97124

Re: Odor Complaints Received June 13, 2011 and June 15, 2011

Dear Mr. Green,

This letter is in response to two recently received odor complaints.

The first complaint was filed by Ms. Charlyn Newton, and indicated that an offensive odor was detected while driving "east on Highway 26 by Glencoe Road" at 6:40 PM on June 9, 2011. However, the complaint was not filed until the morning of June 13<sup>th</sup>. The description of the odor given by Ms. Newton was vague, only stating "full of rot." A proper follow up investigation of the complaint could not be conducted, as the complaint was received four days after the odor was detected. Weather data from the time of the complaint indicates a northeast wind was present at roughly 11.5 mph (please see attached Odor Complaint Investigation Map).

The second complaint was filed by Ms. Cheri Olson, and indicated that an offensive odor was detected while driving "West on Highway 26 at Glencoe Road" at 4:19 PM on June 15, 2011. The description of the odor given by Ms. Olson was vague, only stating "stinks."

An investigation of the complaint was conducted as detailed on the attached Odor Complaint Investigation Form (attached). Shortly after the complaint was received, Recology Vice President Chris Choate and California Composting General Manager Greg Pryor conducted an on and offsite odor investigation. After travelling both east and west along Highway 26, they were unable to detect any odors. A review of the weather data from the time of the complaint indicates a west-northwest wind was present at roughly 16 mph (please see attached Odor Complaint Investigation Map). This would indicate that the wind was blowing in the opposite direction of the complaint location. Operational conditions were evaluated at the site, and no anaerobic conditions were identified.

Odor minimization will continue to be one of the main objectives of any further site development. Please contact me at (503) 226-6161 if you have any questions or require further information.

Administrative Office: 235 North First Street | Dixon, CA 95620-3027 | T: 800.208.2371 | F: 707.678.5148  
Site Location: Compost Oregon | 8712 Aumsville Hwy SE | Salem, OR 97317 | T: 503.249.3117  
Site Location: Nature's Needs | 9570 NW 307th Ave | North Plains, OR 97133 | T: 503.647.9489

RecologyOregonCompost.com



Sincerely,

A handwritten signature in dark ink, appearing to read 'Amé LeCocq', with a stylized flourish at the end.

Amé LeCocq  
Regional Environmental Compliance Manager  
Recology Oregon Compost  
Nature's Needs

Cc: Stephanie Rawson, Oregon DEQ

Attachments: Washington County Odor Compliant Forms  
Natures Needs Odor Complaint Investigation Forms  
Odor Complaint Investigation Maps  
Weather data



# WASHINGTON COUNTY, OREGON Solid Waste and Recycling Program

## ODOR COMPLAINT FORM

(This form is to be used for receiving any and all complaints that may be related to offensive odors. Please forward all such complaints to the Office of the Washington County Solid Waste and Recycling Program and to the Nature's Needs Composting Facility as noted below.)

Date Complaint Received: 6/13/11

Date Offensive Odor Detected by Complainant: 6/9/11

Time of day Offensive Odor detected: 6:40 ☐ a.m. ☒ p.m.

Name of Person Filing Complaint: Charlyn Newton

Telephone Number of Person Filing Complaint: (503) 516-6558

Address of Person Filing Complaint: 10260 NW 313th  
NP OR 97133

Location of Offensive Odor: East on 26th by Glencoe

Description of the Odor: ☒ Sour/vinagary ☐ Putrid/fishy ☐ Woody  
☐ Rotten eggs ☐ Skunky ☐ Piney/musty  
☐ Other: Please specify \_\_\_\_\_

Other Information: Full of ROT!

Please file complaint with both of the following offices:

Nature's Needs Composting Facility fax number: (503) 647-9485

Washington County Solid Waste fax number: (503) 846-4490

155 N. First Street, MS 5 - Hillsboro, OR 97124  
Phone: (503) 846-8609 • Fax: (503) 846-4490, [www.co.washington.or.us](http://www.co.washington.or.us)  
[www.recyclewise.org](http://www.recyclewise.org)



# Nature's Needs Compost Facility

## Odor Complaint Investigation Map

Date of Complaint: 6/9/2011

Time of Complaint: 6:40 PM

Odor Description: Full of Rot

**A. Nature's Needs LLC**

9570 Northwest 307<sup>th</sup> Ave

North Plains, OR

(503) 647-9489

**B. Complaint Location:**

East on Hwy 26 by Glencoe Road



## **Odor Complaint Investigation Form**

### **Nature's Needs Compost Facility**

**Date of Complaint:** 6/9/2011

**Time of Complaint:** 6:40 pm

**Microclimate Conditions:** (see attached sheet)

**Name of Person Filing Complaint:** Charlyn Newton

**Phone Number:** (503) 647-0899

**Location of Nuisance:** East on Hwy 26 by Glencoe Rd.

**Discussion (Include time of occurrence):** The Odor Complaint Form submitted by Charlyn Newton was received on Monday, June 13<sup>th</sup>, 4 days after the complaint was noted. Mrs. Newton's odor descriptor was "full of rot". Due to receiving the Odor Complaint Form several days after the odor was cited by Mrs. Newton we are not able to conduct a formal odor investigation.

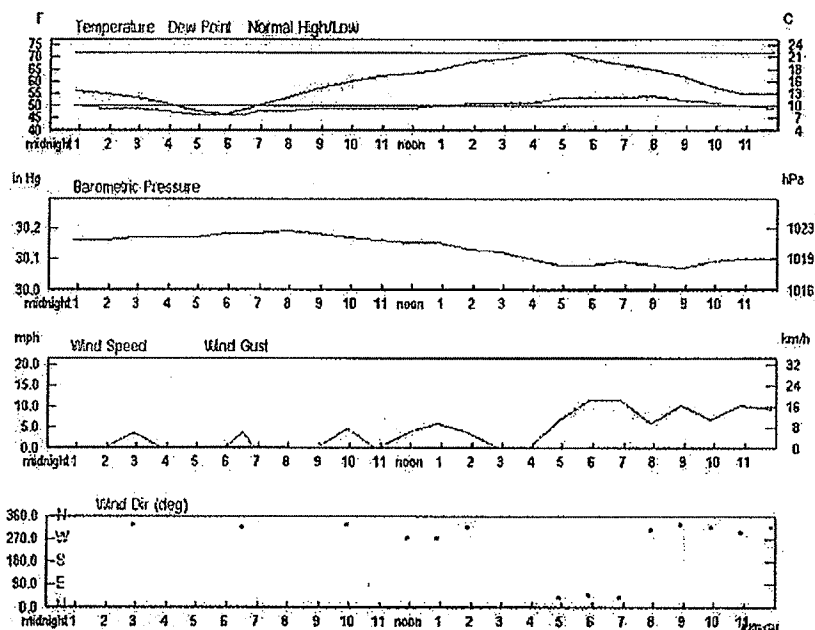
**Determination by site Personnel:** No anaerobic bacteria were being generated on site.

**Is Nature of Odor Short or Long Term?** Nature of the odor is undetermined.

**If Odor is Evident, What Steps Will be Taken to Reduce Odors?**

There is no evidence of anaerobic conditions on site. Incoming feed stock unloaded onto the tipping pad is processed in a timely manner to minimize any anaerobic bacteria that may be present in the feedstock.

Additionally, there is also a pile of a carbon source (wood chips) near the tipping area available for immediate use to incorporate into an incoming load of feedstock if it contains a high concentration of nitrogen (grass clippings). The added carbon base creates a more porous environment increasing aeration & promoting the growth of beneficial bacteria, offsetting the growth of anaerobic bacteria.



Certify This Report

### Hourly Observations

JUNE 9, 2011

Time (PDT)	Temp.	Dew Point	Humidity	Sea Level Pressure	Visibility	Wind Dir	Wind Speed	Gust Speed	Precip	Events	Conditions
12:53 AM	55.9 °F	50.0 °F	80%	30.16 in	10.0 miles	Calm	Calm	-	N/A		Overcast
1:53 AM	55.0 °F	48.9 °F	80%	30.16 in	10.0 miles	Calm	Calm	-	N/A		Overcast
2:53 AM	53.1 °F	48.9 °F	86%	30.17 in	10.0 miles	NNW	3.5 mph	-	N/A		Overcast
3:53 AM	51.1 °F	48.0 °F	89%	30.17 in	10.0 miles	Calm	Calm	-	N/A		Mostly Cloudy
4:53 AM	48.0 °F	46.0 °F	93%	30.17 in	10.0 miles	Calm	Calm	-	N/A		Clear
5:53 AM	46.9 °F	46.0 °F	97%	30.18 in	10.0 miles	Calm	Calm	-	N/A		Partly Cloudy
6:29 AM	48.2 °F	46.4 °F	93%	30.18 in	10.0 miles	NW	3.5 mph	-	N/A		Scattered Clouds
6:53 AM	50.0 °F	48.0 °F	93%	30.18 in	10.0 miles	Calm	Calm	-	N/A		Scattered Clouds
7:53 AM	53.1 °F	48.0 °F	83%	30.19 in	10.0 miles	Calm	Calm	-	N/A		Partly Cloudy
8:53 AM	57.0 °F	48.9 °F	74%	30.18 in	10.0 miles	Calm	Calm	-	N/A		Partly Cloudy
9:53 AM	60.1 °F	48.9 °F	67%	30.17 in	10.0 miles	NNW	4.6 mph	-	N/A		Scattered Clouds
10:53 AM	62.1 °F	48.9 °F	62%	30.16 in	10.0 miles	Calm	Calm	-	N/A		Scattered Clouds
11:53 AM	63.0 °F	48.9 °F	60%	30.15 in	10.0 miles	West	3.5 mph	-	N/A		Clear
12:53 PM	64.9 °F	50.0 °F	58%	30.15 in	10.0 miles	West	6.8 mph	-	N/A		Scattered Clouds
1:53 PM	68.0 °F	51.1 °F	55%	30.13 in	10.0 miles	NW	3.5 mph	-	N/A		Clear
2:53 PM	69.1 °F	51.1 °F	53%	30.12 in	10.0 miles	Calm	Calm	-	N/A		Partly Cloudy
2:53 PM	71.1 °F	51.1 °F	49%	30.10 in	10.0 miles	Calm	Calm	-	N/A		Clear
4:53 PM	72.0 °F	53.1 °F	51%	30.08 in	10.0 miles	NE	6.9 mph	-	N/A		Partly Cloudy

5:53 PM	69.1 °F	53.1 °F	57%	30.08 in	10.0 miles	NE	11.6 mph	-	N/A	Clear
* 6:53 PM	66.9 °F	53.1 °F	61%	30.09 in	10.0 miles	NE	11.5 mph	-	N/A	Scattered Clouds
7:53 PM	64.9 °F	54.0 °F	68%	30.08 in	10.0 miles	NW	5.8 mph	-	N/A	Clear
8:53 PM	62.1 °F	52.0 °F	70%	30.07 in	10.0 miles	NNW	10.4 mph	-	N/A	Partly Cloudy
9:53 PM	57.9 °F	51.1 °F	78%	30.09 in	10.0 miles	NW	6.9 mph	-	N/A	Partly Cloudy
10:53 PM	55.0 °F	50.0 °F	83%	30.10 in	10.0 miles	WNW	10.4 mph	-	N/A	Clear
11:53 PM	55.0 °F	48.9 °F	80%	30.10 in	10.0 miles	NW	9.2 mph	-	N/A	Partly Cloudy
Show full METARS   METAR FAQ   Comma Delimited File										



## WASHINGTON COUNTY, OREGON

### Solid Waste and Recycling Program

#### ODOR COMPLAINT FORM

*(This form is to be used for receiving any and all complaints that may be related to offensive odors. Please forward all such complaints to the Office of the Washington County Solid Waste and Recycling Program and to the Nature's Needs Composting Facility as noted below.)*

Date Complaint Received: 6/15/11

Date Offensive Odor Detected by Complainant: 6/15/11

Time of day Offensive Odor detected: 4:19 ☐ a.m. ☒ p.m.

Name of Person Filing Complaint: Cheri Olson

Telephone Number of Person Filing Complaint: (503) 647-0899

Address of Person Filing Complaint: 31118 NW Commercial St.  
NP, OR 97133

Location of Offensive Odor: Going W. on 26th @ Glencoe

Description of the Odor: ☐ Sour/Vinegary ☐ Putrid/fishy ☐ Woody  
☐ Rotten eggs ☐ Skunky ☐ Piney/musty  
☐ Other: Please specify \_\_\_\_\_

Other Information: Stinks

**Please file complaint with both of the following offices:**

Nature's Needs Composting Facility      fax number: (503) 647-9485

Washington County Solid Waste      fax number: (503) 846-4490

155 N. First Street, MS 5 • Hillsboro, OR 97124  
Phone: (503) 846-8609 • Fax: (503) 846-4490, [www.co.washington.or.us](http://www.co.washington.or.us)  
[www.recyclewise.org](http://www.recyclewise.org)

## Nature's Needs Compost Facility

### Odor Complaint Investigation Map

Date of Complaint: 6/15/2011

Time of Complaint: 4:19 PM

Odor Description: Stinks

**A. Nature's Needs LLC**

9570 Northwest 307<sup>th</sup> Ave

North Plains, OR

(503) 647-9489

**B. Complaint Location:**

Going West on Hwy 26 at Glencoe Road



## **Odor Complaint Investigation Form**

### **Nature's Needs Compost Facility**

**Date of Complaint:** 6/15/2011

**Time of Complaint:** 4:19 pm

**Microclimate Conditions:** (see attached sheet)

**Name of Person Filing Complaint:** Cheri Olson (former Mayor of North Plains)

**Phone Number:** (503) 647-0899

**Location of Nuisance:** Going West on Hwy 26 at Glencoe Rd.

**Discussion (Include time of occurrence):** We received an Odor Complaint Form submitted by Cheri Olson at 4:20 pm. Recology Oregon Compost Site Supervisor at Nature's Needs Pedro Campuzano, Recology VP Chris Choat & Recology California Composting GM Greg Pryor were immediately notified of the complaint. They drove to the indicated sites noted on odor complaint form & the surrounding areas to assess the air for any odors.

No "stinky"/mal odors were detected by Pedro, Chris or Greg. It was also noted that the wind was blowing in the opposite direction of the complaint location.

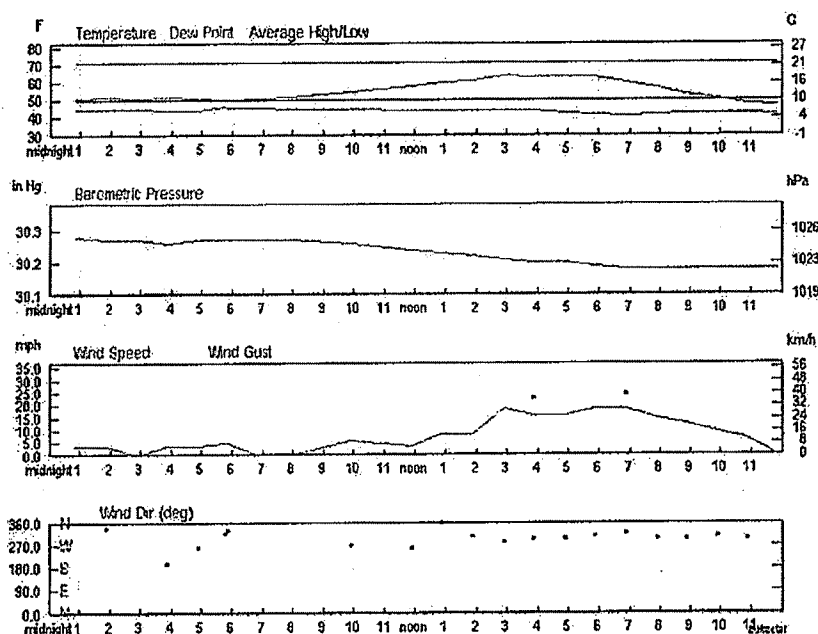
**Determination by site Personnel:** No anaerobic bacteria were being generated on site.

**Is Nature of Odor Short or Long Term?** Nature of the odor is undetermined.

**If Odor is Evident, What Steps Will be Taken to Reduce Odors?**

There is no evidence of anaerobic conditions on site. Incoming feed stock unloaded onto the tipping pad is processed in a timely manner to minimize any anaerobic bacteria that may be present in the feedstock.

Additionally, there is also a pile of a carbon source (wood chips) near the tipping area available for immediate use to incorporate into an incoming load of feedstock if it contains a high concentration of nitrogen (grass clippings). The added carbon base creates a more porous environment increasing aeration & promoting the growth of beneficial bacteria, offsetting the growth of anaerobic bacteria.



Certify This Report

## Hourly Observations

JUNE 15, 2011

Time (PDT)	Temp.	Dew Point	Humidity	Sea Level Pressure	Visibility	Wind Dir	Wind Speed	Gust Speed	Precip	Events	Conditions
12:53 AM	51.1 °F	45.0 °F	80%	30.28 in	10.0 miles	NE	3.5 mph	-	N/A		Mostly Cloudy
1:53 AM	52.0 °F	45.0 °F	77%	30.27 in	10.0 miles	NNW	3.5 mph	-	N/A		Overcast
2:53 AM	51.1 °F	45.0 °F	80%	30.27 in	10.0 miles	Calm	Calm	-	N/A		Overcast
3:53 AM	52.0 °F	44.1 °F	74%	30.26 in	10.0 miles	SSW	3.5 mph	-	N/A		Overcast
4:53 AM	51.1 °F	44.1 °F	77%	30.27 in	10.0 miles	West	3.5 mph	-	N/A		Overcast
5:48 AM	50.0 °F	46.4 °F	87%	30.27 in	7.0 miles	NW	4.6 mph	-	0.00 in	Rain	Light Rain
6:53 AM	60.0 °F	46.0 °F	86%	30.27 in	8.0 miles	NNW	4.6 mph	-	0.00 in	Rain	Light Rain
6:53 AM	51.1 °F	46.0 °F	83%	30.27 in	10.0 miles	Calm	Calm	-	0.00 in		Overcast
7:53 AM	52.0 °F	45.0 °F	77%	30.27 in	10.0 miles	Calm	Calm	-	N/A		Overcast
9:53 AM	55.0 °F	45.0 °F	69%	30.26 in	10.0 miles	West	5.8 mph	-	0.00 in		Overcast
11:53 AM	57.9 °F	44.1 °F	60%	30.24 in	10.0 miles	West	3.5 mph	-	N/A		Overcast
12:53 PM	60.1 °F	44.1 °F	55%	30.23 in	10.0 miles	North	8.1 mph	-	0.00 in	Rain	Light Rain
1:53 PM	61.0 °F	44.1 °F	54%	30.22 in	10.0 miles	NW	8.1 mph	-	0.00 in		Overcast
2:53 PM	64.0 °F	44.1 °F	48%	30.21 in	10.0 miles	WNW	18.4 mph	26.5 mph	N/A		Mostly Cloudy
3:53 PM	63.0 °F	44.1 °F	50%	30.20 in	10.0 miles	WNW	16.1 mph	23.0 mph	N/A		Scattered Clouds
4:53 PM	63.0 °F	43.0 °F	48%	30.20 in	10.0 miles	WNW	16.1 mph	-	N/A		Clear
5:53 PM	63.0 °F	42.1 °F	46%	30.19 in	10.0 miles	NW	18.4 mph	23.0 mph	N/A		Overcast
6:53 PM	60.1 °F	41.0 °F	49%	30.18 in	10.0 miles	NW	18.4 mph	24.2 mph	N/A		Scattered Clouds
7:53 PM	57.0 °F	42.1 °F	57%	30.18 in	10.0 miles	WNW	15.0 mph	-	N/A		Scattered Clouds





July 18, 2011

Mr. Jerry Green  
Program Coordinator  
Washington County Solid Waste and Recycling  
155 N First Ave, Suite 160, MS-5  
Hillsboro, OR 97124

Re: Odor Complaints Received July 5, 2011

Dear Mr. Green,

This letter is in response to two recently received odor complaints.

The first complaint, filed on July 5, 2011 by Ms. Connie Baron, indicated that an offensive odor was detected at her home at 8:00 am that morning. The odor quality was described as "throw-up". The second complaint was also filed the morning of July 5, 2011 also for an odor detected at 8:00 am on NW Commercial Street. This complaint was filed by Ms. Angie Lehnert and describes the odor as putrid/fishy.

Weather data from the time of these complaints indicates a mild to moderate (4 mph) winds from the south-southeast (please see attached weather data and Odor Complaint Investigation Map).

An investigation of the complaints was conducted as detailed on the attached Odor Complaint Investigation Form (attached). Between 7:30 and 8:00 am the morning of July 5<sup>th</sup>, Jessica Campuzano, Nature's Needs personnel was conducting daily off-site odor monitoring during which she noted only a slight grassy/yard debris smell in the area of the complaints.

In addition to the offsite investigations, the onsite operational conditions were evaluated. No anaerobic conditions were identified, and all Best Management Practices were implemented. Later in the morning (around 10:20 am), Washington County Code Enforcement Officer, Andre Bjornskov walked the site with Nature's Needs Site Supervisor, Pedro Campuzano during which no significant odor issues were observed.

Odor minimization will continue to be one of the main objectives of any further site development. Please contact me at (503) 226-6161 if you have any questions or require further information.



Sincerely,

A handwritten signature in dark ink, appearing to read 'Ame LeCocq', with a stylized flourish at the end.

Ame LeCocq  
Regional Environmental Compliance Manager  
Recology Oregon Compost  
Nature's Needs

Cc: Stephanie Rawson, Oregon DEQ

Attachments: Washington County Odor Compliant Forms  
Natures Needs Odor Complaint Investigation Forms  
Odor Complaint Investigation Maps  
Weather data

**WASHINGTON COUNTY, OREGON**  
**Solid Waste and Recycling Program****ODOR COMPLAINT FORM**

*(This form is to be used for receiving any and all complaints that may be related to offensive odors. Please forward all such complaints to the Office of the Washington County Solid Waste and Recycling Program and to the Nature's Needs Composting Facility as noted below.)*

Date Complaint Received: 7/5/11Date Offensive Odor Detected by Complainant: 7/5/11Time of day Offensive Odor detected: 8 ☒ a.m. ☐ p.m.Name of Person Filing Complaint: Connie BaronTelephone Number of Person Filing Complaint: 503-647-2627Address of Person Filing Complaint: 10826 NW McKay Creek Ct.  
North PlainsLocation of Offensive Odor: Her home this morning.  
Everywhere (incl. 26) all monthDescription of the Odor: ☐ Sour/vinegary ☐ Putrid/fishy ☐ Woody  
☐ Rotten eggs ☐ Skunky ☐ Piney/musty  
☒ Other: Please specify "Throw-up" hideous,  
unacceptable!

Other Information: \_\_\_\_\_

**Please file complaint with both of the following offices:**

Nature's Needs Composting Facility

fax number: (503) 647-9485

Washington County Solid Waste

fax number: (503) 648-4490

155 N. First Street, MS 5 • Hillsboro, OR 97124  
Phone: (503) 846-8609 • Fax: (503) 846-4490, [www.co.washington.or.us](http://www.co.washington.or.us)  
[www.recyclewise.org](http://www.recyclewise.org)

**WASHINGTON COUNTY, OREGON**  
**Solid Waste and Recycling Program****ODOR COMPLAINT FORM**

(This form is to be used for receiving any and all complaints that may be related to offensive odors. Please forward all such complaints to the Office of the Washington County Solid Waste and Recycling Program and to the Nature's Needs Composting Facility as noted below.)

Date Complaint Received: 7/5/2011Date Offensive Odor Detected by Complainant: 7/5/2011Time of day Offensive Odor detected: 8:00 ☒ a.m. ☐ p.m.Name of Person Filing Complaint: ANGIE LEHNERTTelephone Number of Person Filing Complaint: (503) 647-5555Address of Person Filing Complaint: 31360 NW COMMERCIAL  
NORTH PLAINS, OR 97133Location of Offensive Odor: SAME

Description of the Odor: ☐ Sour/vinegary ☒ Putrid/fishy ☐ Woody  
☐ Rotten eggs ☐ Skunky ☐ Piney/musty  
☐ Other; Please specify \_\_\_\_\_

Other Information: STANDARD NATURE'S NEEDS ODOR**Please file complaint with both of the following offices:**

Nature's Needs Composting Facility

fax number: (503) 647-9485

Washington County Solid Waste

fax number: (503) 846-4490

155 N. First Street, MS 5 - Hillsboro, OR 97124  
Phone: (503) 846-8609 - Fax: (503) 846-4490, [www.co.washington.or.us](http://www.co.washington.or.us)  
[www.recyclewisc.org](http://www.recyclewisc.org)

Recology Natures Needs 7/05/11

Date	Time	Temp Out	Hi Temp	Low Temp	Out Hum	Dew Pt.	Wind Speed	Wind Dir	Wind Run	Hi Speed	Hi Dir	Wind Chill	Heat Index	THW Index	THSW Index	Bar	Rain	Rain Rate	Solar Rad.
7/05/11	4:20a	50.7	50.9	50.7	90	47.9	0.0	---	0.00	0.0	---	50.7	50.9	50.9	---	30.108	0.00	0.00	---
7/05/11	4:25a	50.6	50.7	50.6	91	48.1	0.0	---	0.00	0.0	---	50.6	50.9	50.9	---	30.110	0.00	0.00	---
7/05/11	4:30a	50.6	50.7	50.6	91	48.1	0.0	NNE	0.00	1.0	NNE	50.6	50.9	50.9	---	30.111	0.00	0.00	---
7/05/11	4:35a	50.5	50.6	50.5	91	48.0	0.0	NNE	0.00	2.0	NNE	50.5	50.8	50.8	---	30.110	0.00	0.00	---
7/05/11	4:40a	50.5	50.6	50.5	92	48.3	0.0	NNE	0.00	1.0	NNE	50.5	50.8	50.8	---	30.114	0.00	0.00	---
7/05/11	4:45a	50.4	50.5	50.4	92	48.2	0.0	NNE	0.00	2.0	NNE	50.4	50.7	50.7	---	30.113	0.00	0.00	---
7/05/11	4:50a	50.3	50.4	50.3	92	48.1	0.0	NNE	0.00	1.0	NNE	50.3	50.7	50.7	---	30.113	0.00	0.00	---
7/05/11	4:55a	50.1	50.3	50.1	92	47.9	0.0	NNE	0.00	1.0	NNE	50.1	50.5	50.5	---	30.115	0.00	0.00	---
7/05/11	5:00a	50.0	50.1	50.0	92	47.8	0.0	NNE	0.00	1.0	NNE	50.0	50.4	50.4	---	30.116	0.00	0.00	---
7/05/11	5:05a	49.9	50.0	49.9	92	47.7	0.0	---	0.00	0.0	---	49.9	50.3	50.3	---	30.117	0.00	0.00	---
7/05/11	5:10a	49.9	49.9	49.8	93	48.0	0.0	---	0.00	0.0	---	49.9	50.3	50.3	---	30.117	0.00	0.00	---
7/05/11	5:15a	49.9	49.9	49.8	93	48.0	0.0	NNE	0.00	1.0	NNE	49.9	50.3	50.3	---	30.117	0.00	0.00	---
7/05/11	5:20a	49.9	49.9	49.9	93	48.0	0.0	NNE	0.00	1.0	NNE	49.9	50.3	50.3	---	30.116	0.00	0.00	---
7/05/11	5:25a	49.7	49.9	49.7	93	47.8	0.0	NNE	0.00	1.0	NNE	49.7	50.1	50.1	---	30.117	0.00	0.00	---
7/05/11	5:30a	49.7	49.7	49.7	93	47.8	0.0	---	0.00	0.0	---	49.7	50.1	50.1	---	30.119	0.00	0.00	---
7/05/11	5:35a	49.7	49.7	49.7	93	47.8	0.0	---	0.00	0.0	---	49.7	50.1	50.1	---	30.122	0.00	0.00	---
7/05/11	5:40a	49.7	49.7	49.7	93	47.8	0.0	---	0.00	0.0	---	49.7	50.1	50.1	---	30.123	0.00	0.00	---
7/05/11	5:45a	49.8	49.8	49.7	93	47.9	0.0	---	0.00	0.0	---	49.8	50.2	50.2	---	30.124	0.00	0.00	---
7/05/11	5:50a	49.9	49.9	49.7	93	48.0	0.0	---	0.00	0.0	---	49.9	50.3	50.3	---	30.125	0.00	0.00	---
7/05/11	5:55a	50.1	50.1	49.9	92	47.9	0.0	NNE	0.00	2.0	NNE	50.1	50.5	50.5	---	30.124	0.00	0.00	---
7/05/11	6:00a	50.2	50.2	50.1	92	48.0	1.0	NNE	0.08	2.0	NNE	50.2	50.6	50.6	---	30.126	0.00	0.00	---
7/05/11	6:05a	50.3	50.3	50.2	91	47.8	0.0	NNE	0.00	1.0	NNE	50.3	50.6	50.6	---	30.125	0.00	0.00	---
7/05/11	6:10a	50.6	50.6	50.3	92	48.4	0.0	NNE	0.00	2.0	NNE	50.6	50.9	50.9	---	30.125	0.00	0.00	---
7/05/11	6:15a	50.8	50.8	50.6	91	48.3	1.0	NNE	0.08	2.0	NNE	50.8	51.1	51.1	---	30.127	0.00	0.00	---
7/05/11	6:20a	51.0	51.0	50.8	90	48.2	0.0	NNE	0.00	2.0	NNE	51.0	51.2	51.2	---	30.129	0.00	0.00	---
7/05/11	6:25a	51.3	51.3	51.0	90	48.5	0.0	NNE	0.00	1.0	NNE	51.3	51.5	51.5	---	30.130	0.00	0.00	---
7/05/11	6:30a	51.7	51.7	51.4	90	48.9	0.0	NNE	0.00	2.0	NNE	51.7	51.9	51.9	---	30.129	0.00	0.00	---
7/05/11	6:35a	52.2	52.2	51.7	99	49.1	0.0	NNE	0.00	1.0	NNE	52.2	52.3	52.3	---	30.132	0.00	0.00	---
7/05/11	6:40a	52.6	52.6	52.2	88	49.1	0.0	---	0.00	0.0	---	52.6	52.7	52.7	---	30.130	0.00	0.00	---
7/05/11	6:45a	53.1	53.1	52.6	88	49.6	0.0	NNE	0.00	2.0	NNE	53.1	53.1	53.1	---	30.128	0.00	0.00	---
7/05/11	6:50a	53.5	53.5	53.1	87	49.7	1.0	NNE	0.08	2.0	NNE	53.5	53.5	53.5	---	30.128	0.00	0.00	---
7/05/11	6:55a	53.8	53.8	53.5	87	50.0	1.0	NNE	0.08	2.0	NNE	53.8	53.8	53.8	---	30.131	0.00	0.00	---
7/05/11	7:00a	54.1	54.1	53.8	86	50.0	1.0	NNE	0.08	2.0	NNE	54.1	54.0	54.0	---	30.129	0.00	0.00	---
7/05/11	7:05a	54.6	54.6	54.1	86	50.5	1.0	NNE	0.08	2.0	NNE	54.6	54.5	54.5	---	30.128	0.00	0.00	---
7/05/11	7:10a	55.0	55.0	54.6	86	50.9	0.0	NE	0.00	2.0	NE	55.0	54.9	54.9	---	30.126	0.00	0.00	---
7/05/11	7:15a	55.9	55.9	55.0	84	51.1	0.0	ENE	0.00	2.0	NE	55.9	55.8	55.8	---	30.126	0.00	0.00	---
7/05/11	7:20a	56.4	56.4	55.9	83	51.3	1.0	NE	0.08	3.0	NE	56.4	56.2	56.2	---	30.126	0.00	0.00	---
7/05/11	7:25a	56.8	56.8	56.4	83	51.7	0.0	NE	0.00	1.0	NE	56.8	56.6	56.6	---	30.125	0.00	0.00	---
7/05/11	7:30a	57.5	57.5	56.8	82	52.0	0.0	NE	0.00	2.0	NE	57.5	57.3	57.3	---	30.126	0.00	0.00	---
7/05/11	7:35a	58.6	58.6	57.5	79	52.1	0.0	NE	0.00	1.0	NE	58.6	58.3	58.3	---	30.126	0.00	0.00	---
7/05/11	7:40a	59.4	59.4	58.6	80	53.2	0.0	NE	0.00	2.0	NE	59.4	59.2	59.2	---	30.125	0.00	0.00	---
7/05/11	7:45a	59.6	59.6	59.4	76	52.0	0.0	ESE	0.00	2.0	ESE	59.6	59.2	59.2	---	30.125	0.00	0.00	---
7/05/11	7:50a	60.2	60.2	59.6	74	51.9	1.0	SSE	0.08	3.0	SSE	60.2	59.8	59.8	---	30.128	0.00	0.00	---
7/05/11	7:55a	60.6	60.6	60.2	73	51.9	1.0	SSE	0.08	4.0	SE	60.6	60.2	60.2	---	30.128	0.00	0.00	---
7/05/11	8:00a	60.9	60.9	60.6	73	52.2	2.0	SSE	0.17	4.0	SE	60.9	60.5	60.5	---	30.128	0.00	0.00	---
7/05/11	8:05a	61.1	61.1	60.9	73	52.4	2.0	SE	0.17	4.0	S	61.1	60.7	60.7	---	30.130	0.00	0.00	---
7/05/11	8:10a	61.4	61.4	61.1	73	52.7	2.0	SE	0.17	4.0	SE	61.4	61.0	61.0	---	30.131	0.00	0.00	---
7/05/11	8:15a	62.0	62.0	61.4	72	52.9	2.0	SSE	0.17	4.0	SE	62.0	61.6	61.6	---	30.130	0.00	0.00	---
7/05/11	8:20a	62.3	62.3	62.0	71	52.8	2.0	SSE	0.17	5.0	SSW	62.3	61.9	61.9	---	30.131	0.00	0.00	---
7/05/11	8:25a	62.3	62.3	62.3	69	52.0	3.0	SSW	0.25	6.0	SSW	62.3	61.8	61.8	---	30.131	0.00	0.00	---
7/05/11	8:30a	62.6	62.6	62.3	66	51.1	3.0	SE	0.25	5.0	SE	62.6	62.0	62.0	---	30.130	0.00	0.00	---

Recology Natures Needs 7/05/11

Date	Time	Temp Out	Hi Temp	Low Temp	Out Hum	Dew Pt.	Wind Speed	Wind Dir	Wind Run	Hi Speed	Hi Dir	Wind Chill	Heat Index	THW Index	THSW Index	Bar	Rain	Rain Rate	Solar Rad.
7/05/11	8:35a	62.7	62.7	62.6	66	51.2	3.0	SSW	0.25	6.0	S	62.7	62.1	62.1	---	30.130	0.00	0.00	---
7/05/11	8:40a	62.9	62.9	62.7	66	51.4	4.0	SSW	0.33	7.0	SSW	62.9	62.3	62.3	---	30.129	0.00	0.00	---
7/05/11	8:45a	63.2	63.2	62.9	66	51.6	3.0	SW	0.25	5.0	SW	63.2	62.7	62.7	---	30.132	0.00	0.00	---
7/05/11	8:50a	63.7	63.7	63.2	67	52.5	3.0	S	0.25	6.0	SSW	63.7	63.3	63.3	---	30.133	0.00	0.00	---
7/05/11	8:55a	64.1	64.1	63.7	67	52.9	1.0	ENE	0.08	3.0	SSW	64.1	63.7	63.7	---	30.132	0.00	0.00	---
7/05/11	9:00a	64.6	64.6	64.1	65	52.6	3.0	SSE	0.25	6.0	SE	64.6	64.2	64.2	---	30.132	0.00	0.00	---
7/05/11	9:05a	64.9	64.9	64.6	64	52.4	2.0	SE	0.17	4.0	SSE	64.9	64.5	64.5	---	30.134	0.00	0.00	---
7/05/11	9:10a	65.1	65.1	64.9	64	52.6	3.0	SSE	0.25	5.0	ESE	65.1	64.7	64.7	---	30.131	0.00	0.00	---
7/05/11	9:15a	65.8	65.8	65.1	64	53.3	1.0	ESE	0.08	4.0	ESE	65.8	65.5	65.5	---	30.128	0.00	0.00	---
7/05/11	9:20a	66.2	66.2	65.9	63	53.2	4.0	SSE	0.33	7.0	SE	66.2	65.8	65.8	---	30.133	0.00	0.00	---
7/05/11	9:25a	66.1	66.2	66.1	63	53.1	4.0	SE	0.33	7.0	SE	66.1	65.7	65.7	---	30.129	0.00	0.00	---
7/05/11	9:30a	66.1	66.1	66.0	61	52.3	2.0	SE	0.17	5.0	SSE	66.1	65.5	65.5	---	30.129	0.00	0.00	---
7/05/11	9:35a	66.6	66.6	66.1	60	52.3	3.0	SSE	0.25	5.0	E	66.6	66.0	66.0	---	30.128	0.00	0.00	---
7/05/11	9:40a	66.9	66.9	66.6	61	53.0	2.0	SSW	0.17	5.0	SSW	66.9	66.5	66.5	---	30.127	0.00	0.00	---
7/05/11	9:45a	67.2	67.2	66.9	58	51.9	3.0	SE	0.25	5.0	ESE	67.2	66.6	66.6	---	30.127	0.00	0.00	---
7/05/11	9:50a	67.4	67.4	67.2	60	53.0	3.0	S	0.25	6.0	S	67.4	67.0	67.0	---	30.129	0.00	0.00	---
7/05/11	9:55a	67.2	67.4	67.2	60	52.8	3.0	SW	0.25	6.0	SSW	67.2	66.7	66.7	---	30.124	0.00	0.00	---
7/05/11	10:00a	67.4	67.4	67.3	60	53.0	3.0	SE	0.25	6.0	SE	67.4	67.0	67.0	---	30.123	0.00	0.00	---
7/05/11	10:05a	67.8	67.8	67.4	58	52.5	3.0	SSE	0.25	5.0	SE	67.8	67.3	67.3	---	30.122	0.00	0.00	---
7/05/11	10:10a	68.3	68.3	67.8	57	52.5	1.0	E	0.08	4.0	SE	68.3	67.6	67.6	---	30.121	0.00	0.00	---
7/05/11	10:15a	69.0	69.0	68.3	57	53.1	3.0	S	0.25	5.0	S	69.0	68.2	68.2	---	30.117	0.00	0.00	---
7/05/11	10:20a	69.1	69.1	69.0	57	53.2	1.0	SSE	0.08	4.0	SSE	69.1	68.2	68.2	---	30.119	0.00	0.00	---
7/05/11	10:25a	69.9	69.9	69.1	56	53.5	2.0	E	0.17	5.0	E	69.9	68.7	68.7	---	30.117	0.00	0.00	---
7/05/11	10:30a	69.9	70.0	69.9	56	53.5	3.0	S	0.25	5.0	S	69.9	68.7	68.7	---	30.116	0.00	0.00	---
7/05/11	10:35a	70.0	70.0	69.8	50	54.5	2.0	SSE	0.17	4.0	SSE	70.0	69.0	69.0	---	30.115	0.00	0.00	---
7/05/11	10:40a	70.7	70.7	70.1	56	54.2	3.0	ESE	0.25	5.0	E	70.7	69.7	69.7	---	30.115	0.00	0.00	---
7/05/11	10:45a	71.1	71.1	70.8	55	54.1	3.0	S	0.25	7.0	SE	71.1	70.1	70.1	---	30.117	0.00	0.00	---
7/05/11	10:50a	71.2	71.2	71.1	54	53.7	2.0	ENE	0.17	4.0	ESE	71.2	70.2	70.2	---	30.116	0.00	0.00	---
7/05/11	10:55a	71.6	71.6	71.2	55	54.6	1.0	SE	0.08	3.0	E	71.6	70.9	70.9	---	30.113	0.00	0.00	---
7/05/11	11:00a	72.3	72.3	71.6	53	54.2	3.0	E	0.25	5.0	E	72.3	71.8	71.8	---	30.113	0.00	0.00	---
7/05/11	11:05a	72.8	72.8	72.3	52	54.1	1.0	E	0.08	3.0	NE	72.8	72.4	72.4	---	30.112	0.00	0.00	---
7/05/11	11:10a	73.6	73.6	72.8	53	55.4	0.0	E	0.00	3.0	E	73.6	73.5	73.5	---	30.109	0.00	0.00	---
7/05/11	11:15a	73.5	73.9	73.5	51	54.3	2.0	WSW	0.17	5.0	WSW	73.5	73.2	73.2	---	30.108	0.00	0.00	---
7/05/11	11:20a	73.6	73.6	73.3	54	55.9	2.0	W	0.17	6.0	SSE	73.6	73.6	73.6	---	30.108	0.00	0.00	---
7/05/11	11:25a	73.0	73.6	73.0	53	54.9	3.0	SSW	0.25	6.0	S	73.0	72.8	72.8	---	30.109	0.00	0.00	---
7/05/11	11:30a	73.1	73.1	73.0	53	54.9	2.0	SSW	0.17	6.0	SSW	73.1	72.9	72.9	---	30.106	0.00	0.00	---
7/05/11	11:35a	73.9	73.9	73.1	50	54.1	2.0	ESE	0.17	5.0	ESE	73.9	73.6	73.6	---	30.105	0.00	0.00	---
7/05/11	11:40a	74.4	74.4	73.9	51	55.1	1.0	E	0.08	3.0	S	74.4	74.4	74.4	---	30.104	0.00	0.00	---
7/05/11	11:45a	74.9	74.9	74.4	52	56.1	2.0	W	0.17	4.0	W	74.9	75.1	75.1	---	30.105	0.00	0.00	---
7/05/11	11:50a	75.2	75.2	74.9	49	54.7	2.0	NW	0.17	4.0	W	75.2	75.2	75.2	---	30.104	0.00	0.00	---
7/05/11	11:55a	75.8	75.8	75.2	49	55.3	1.0	N	0.08	4.0	SSW	75.8	75.7	75.7	---	30.100	0.00	0.00	---
7/05/11	12:00p	76.3	76.3	75.9	48	55.2	2.0	SW	0.17	4.0	SSW	76.3	76.1	76.1	---	30.095	0.00	0.00	---
7/05/11	12:05p	76.5	76.5	76.4	46	54.2	2.0	W	0.17	6.0	WSW	76.5	76.1	76.1	---	30.096	0.00	0.00	---
7/05/11	12:10p	77.4	77.4	76.5	45	54.4	1.0	NW	0.08	4.0	NNW	77.4	76.9	76.9	---	30.092	0.00	0.00	---
7/05/11	12:15p	77.9	77.9	77.5	44	54.2	3.0	N	0.25	6.0	N	77.9	77.4	77.4	---	30.095	0.00	0.00	---
7/05/11	12:20p	78.3	78.3	78.0	42	53.3	5.0	WNW	0.42	8.0	WNW	78.3	77.6	77.6	---	30.093	0.00	0.00	---
7/05/11	12:25p	78.9	78.9	78.4	40	52.5	4.0	N	0.33	9.0	NNW	78.9	78.1	78.1	---	30.090	0.00	0.00	---
7/05/11	12:30p	79.0	79.0	78.9	39	51.9	4.0	NW	0.33	8.0	NW	79.0	78.1	78.1	---	30.089	0.00	0.00	---
7/05/11	12:35p	79.1	79.1	78.9	39	52.0	6.0	NNW	0.50	9.0	N	79.1	78.2	78.2	---	30.086	0.00	0.00	---
7/05/11	12:40p	79.3	79.3	78.9	38	51.5	2.0	NW	0.17	7.0	NNW	79.3	78.3	78.3	---	30.085	0.00	0.00	---
7/05/11	12:45p	80.8	80.8	79.3	38	52.8	4.0	NNW	0.33	8.0	ENE	80.8	79.5	79.6	---	30.084	0.00	0.00	---

## **Odor Complaint Investigation Form**

### **Nature's Needs Compost Facility**

**Date of Complaint:** 7/5/2011 (all month)

**Time of Complaint:** 8:00 am

**Microclimate Conditions:** (see attached sheet)

**Name of Person Filing Complaint:** Connie Baron

**Phone Number:** (503) 647-2627

**Location of Nuisance:** 10826 NW McKay Creek Ct, North Plains, OR/Everywhere, including HWY 26

**Date of Complaint:** 7/5/2011

**Time of Complaint:** 8:00 am

**Microclimate Conditions:** (see attached sheet)

**Name of Person Filing Complaint:** Angie Lehnert

**Phone Number:** (503) 647-5555

**Location of Nuisance:** 31360 NW Commercial, North Plains, OR (North Plains City Hall)

**Discussion (Include time of occurrence):** We received two Odor Complaint Forms from N. Plains City Hall submitted by Connie Baron & Angie Lehnert. Mrs. Baron described the odor she noted as "throw-up" hideous/unacceptable & Mrs. Lehnert noted a putrid/fishy odor.

Between 7:30 am & 8:00 am ROCNN site personnel, Jessica Campuzano, drove to the current Nature's Needs Monitoring Checkpoints (see attached). Jessica noted a slight grassy/yard debris odor at the N. Plains City Hall address & on Glencoe Rd. though it was notable, it was faint, <2 using the Nasal Ranger.

At 10:20 am Code Enforcement Officer of Wa. County, Andre Bjornskov, arrived at the NN facility. He walked the site with ROCNN Site Supervisor Pedro Campuzano for approx. 20 minutes. After walking around the active piles Andre concluded that he did not detect nor smell any obnoxious odors.

**Determination by site Personnel:** No anaerobic bacteria were being generated on site.

**Is Nature of Odor Short or Long Term?** Nature of the odor is undetermined.

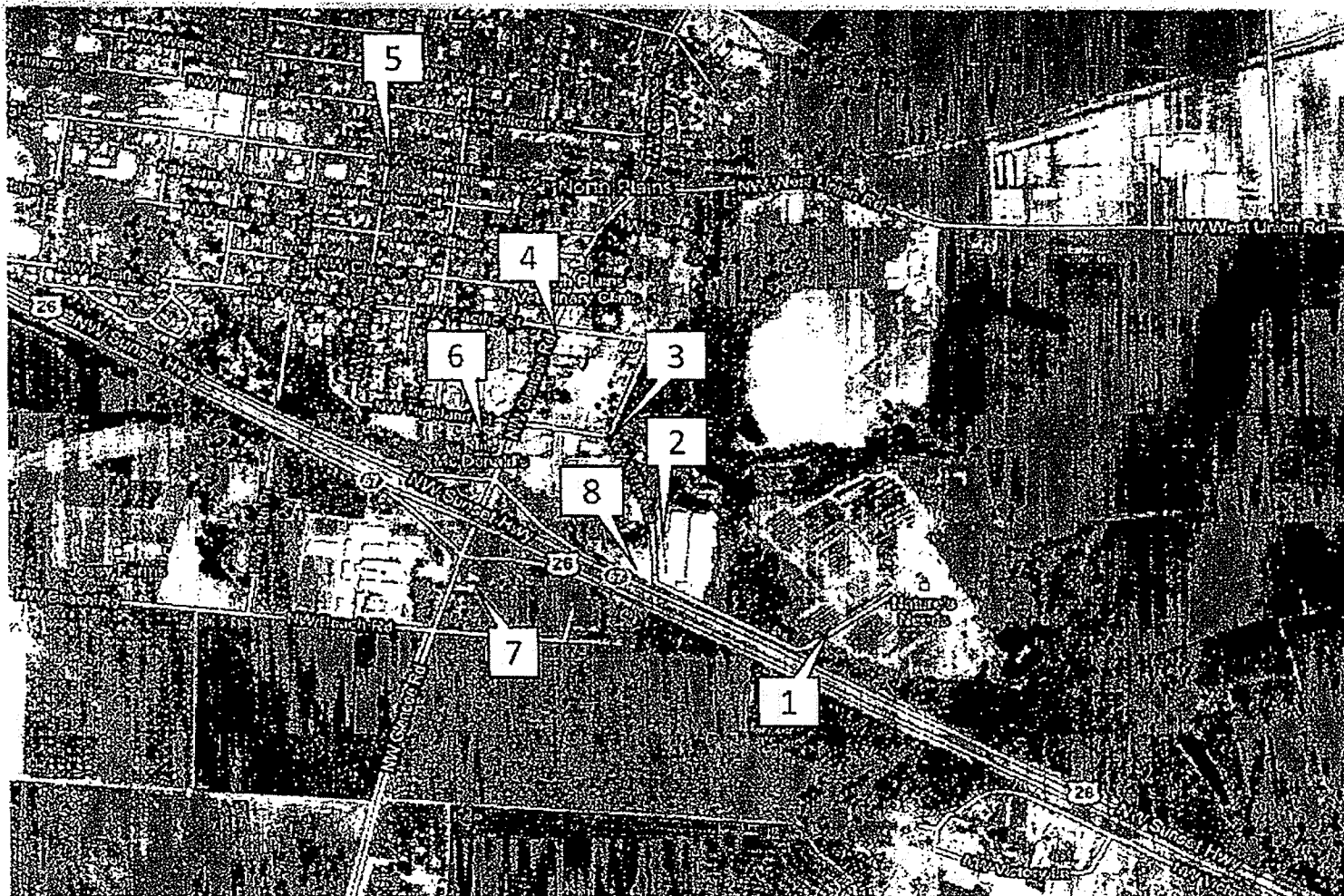
**If Odor is Evident, What Steps Will be Taken to Reduce Odors?**

There is no evidence of anaerobic conditions on site. Incoming feed stock unloaded onto the tipping pad is processed in a timely manner to minimize any anaerobic bacteria that may be present in the feedstock.

Additionally, there is also a pile of a carbon source (wood chips) near the tipping area available for immediate use to incorporate into an incoming load of feedstock if it contains a high concentration of nitrogen (grass clippings). The added carbon base creates a more porous environment increasing aeration & promoting the growth of beneficial bacteria, offsetting the growth of anaerobic bacteria.

Had there been any anaerobic activity present on site the source would be identified, marked, & additional procedures would be implemented to increase the growth of beneficial aerobic bacteria





### Nature's Needs Monitoring Checkpoints

1 = Facility Entrance

4 = King Torta Restaurant

7 = AmPm across 26 on Glencoe

2 = Van Dyke Grain Elevator

5 = City Hall/Library Area

8 = Parking lot adjacent to highway 26 off ramp

3 = Corner of 307th & Highland Court

6 = McDonalds

\*Also drive to next exit and note any odor on Highway

## ODOR MONITORING DATA SHEET

DATE: 7/5/11

TIME	LOCATION	NO	DESCRIPTION	COMMENTS
7:30 am	1			
to	2			
8:00 am	3			
	4		40% - GRASSY (MID DEBRIS CONTAINER)	
	5		↓	
	6			
	7			
	8			
	* HWY 26 E. + W. BOUND ACROSS FROM GATE.		CHEESEY	

<b>Weather Conditions</b> <input checked="" type="checkbox"/> Mostly Sunny <input type="checkbox"/> Partly Cloudy <input type="checkbox"/> Mostly Cloudy <input type="checkbox"/> Overcast <input type="checkbox"/> Hazy	<b>Precipitation</b> <input checked="" type="checkbox"/> None <input type="checkbox"/> Fog <input type="checkbox"/> Rain <input type="checkbox"/> Sleet <input type="checkbox"/> Snow	<b>Wind Direction (Blowing From)</b> <div style="text-align: center;">         N          NW <u>NE</u> E          SW SE          S       </div>	<b>Wind Speed</b> <input checked="" type="checkbox"/> Calm <input type="checkbox"/> Light Breeze (1-5 mph) <input type="checkbox"/> Moderate Wind (5-15 mph) <input type="checkbox"/> Strong Winds (15 mph or higher)
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Temperature: 57.5 °F      Relative Humidity: 82 %      Barometric Pressure: 30.126

Notes: \_\_\_\_\_

7/15/11  
Date

JESSICA CAMPUZANO  
Name

J. Campuzano  
Signature