

MEYER, FLUEGGE & TENNEY, P.S.

ROBERT C. TENNEY
MARK D. WATSON*
JEROME R. AIKEN*
JOHN A. MAXWELL, JR.
PETER M. RITCHIE**
JAMES C. CARMODY

ATTORNEYS & COUNSELORS
230 SOUTH SECOND STREET, SUITE 101
P.O. BOX 22680
YAKIMA, WASHINGTON 98907-2680

JACOB A. LARA
ROBERT S. URLOCKER
PARDIES ROOHANI
HARLEY MONTOYA
NICHOLAS FRONTIN

*Also admitted in Oregon

**Also admitted in Oregon & Virginia

January 5, 2024

Via Email

Jamey Ayling, Planning Manager
Kittitas County Community Development Services
411 North Ruby Street, Suite 2
Ellensburg, WA 98926
Jamey.ayling@co.kittitas.wa.us

Re: Project Name: File No.: 3BR Custom Cuts (CU-23-00001)
Applicant: Scott Toland (Land Owner)

Dear Mr. Ayling:

We represent Wilson Creek Neighbors¹ and provide this comment on *Notice of Application: Re-Notice* issued on December 19, 2023, with respect to conditional use permit application submitted by Scott Toland for design and construction of an Agricultural Processing Facility located at 3200 Wilson Creek Road, Ellensburg, WA 98926 (Assessor Parcel No. 214534). The project was re-noticed due to significant changes in the design of the Agricultural Processing Facility including the addition of a 50,880 square foot “Aerated Wastewater Storage Pond” and associated treatment processes and facilities.²

We will provide comments on both the process and information provided by the applicant.

A. Comments on Process, Procedures, and Lack of Material Information.

Kittitas County Community Development Services (CDS) issued the *Notice of Application: Re-Notice* at 2:47 p.m. on December 20, 2023.³ Comments were due January 5, 2024. Despite request for an extended

¹ Wilson Creek Neighbors is an unincorporated association comprised of more than fifty (50) landowners and residents directly impacted by the proposed slaughterhouse and associated facilities. These comments will supplement prior comments provided on the project proposal by agencies and property owners as well as additional individual comments submitted with respect to the new information and redesign of the proposed project.

² Applicant characterizes the new waste treatment component as “... a small double-lined and aerated pond to hold irrigation water.” The application does not include required information and reports for On-Site Sewage Disposal System (OSDS) as required by local or state law, including required site plan, determinations of soil characteristics, assessments of groundwater levels, or land application processes, procedures and assessments. None of the information provided with respect to the OSDS has been provided by a professional licensed under Ch. 18.43 RCW or Ch. 18.210 RCW.

³ The *Notice of Application Re: Re-Notice* was referenced as being prepared on December 19, 2023. The notice was not

comment period because of disruptions presented by the holidays, CDS denied the request for extension of the comment period.

By way of background, CDS requested that the Applicant file an amended SEPA Checklist to reflect the updated project details on December 14, 2023. Literally no time was spent by CDS in review of the new material. CDS also filed a *SEPA Preliminary Mitigated Determination of Nonsignificance* on December 20, 2023. The MDNS includes none of the conditions or mitigation proposed by the Applicant. We will provide comments based upon the administrative record as it exists at this point and time.

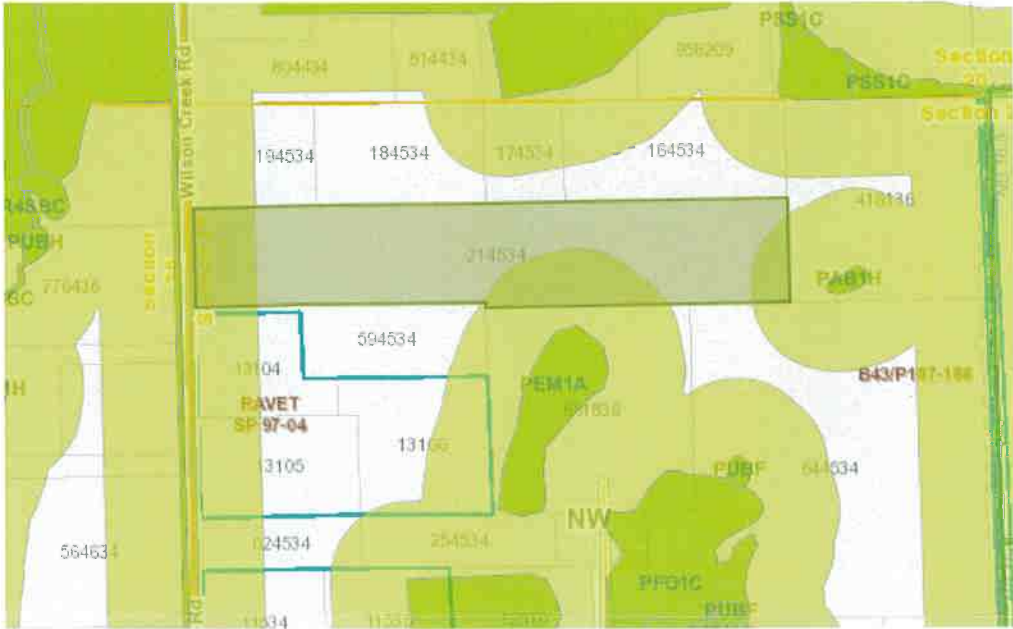
1. Applicant failed to provide an updated site plan for the revised project in accordance with KCC 15A.03.030(2). An applicant is required to submit a compliant site plan with a land use application:

The written application shall be accompanied by a site plan showing the dimensions and arrangement of the proposed development *or changes* including all proposed land uses and structures; points of access, roads and parking areas; septic tank and drain field and replacement areas; areas to be cut or filled; and natural features such as contours, streams, wetlands, hazardous slopes, etc. The administrator may require other drawings, topographic surveys, photographs, or other material essential to an understanding of the proposed use and its relationship to the surrounding properties. (emphasis added).

KCC 15A.03.030(2). The submitted site plan does not identify changes to the original site plan, property lines, setbacks, drain field location, areas for wastewater application, or natural features such as contours, streams, and wetlands. Also ignored were wetlands even though the property include "Wetland Investigation Area". A wetland delineation and report is required for the land use application. Site development and improvements are also located within areas of identified wetlands; a small glimpse of this can be seen in the below .⁴

circulated, however, until email at 2:47 p.m. on December 20, 2023. The email included a correct file number (CU-23-00001), but incorrectly identified the applicant as "The Outpost." Comments were required to be submitted by January 5, 2024. The comment period included both Christmas and New Year holidays which significantly limited the ability to secure necessary information from referenced agencies and otherwise prepare full and complete comments on the revised application. Despite requests for an extension, Kittitas County refused to extend the comment period. This was after allowing the Applicant more than six (6) months to respond to agency and public comments. In addition to the significant delay in providing comment responses, applicant fundamentally and significantly modified their application and introduced an expansive on-site waste treatment system for handling significant volumes of waste. This is important to point out as review, comment, and responsiveness to comments on a draft EIS are the focal point of the State Environmental Policy Act's commenting process for determination of environmental impacts can only be developed as the result of scoping and making final statements. WAC 197-11-500(4).

⁴ Attached hereto as *Attachment A* is a Kittitas County COMPAS Map for Assessor Parcel No. 214534, which shows the site location and its proximity to identified Wetlands (shown in light green) and "Wetland Investigation Areas" (shown in dark green).



2. Notice of Application does not comply with optional SEPA processes under WAC 197-11-550. Kittitas County CDS issued the *Notice of Application: Re-Notice Memo* utilizing the optional DNS process set forth in WAC 197-11-355. Under the optional process, WAC 197-11-355(2)(b) provides that the lead agency "...shall ... list in the notice of application the conditions being considered to mitigate environmental impacts, if a mitigated DNS is expected;" Kittitas County CDS did not identify conditions being considered to mitigate environmental impacts within the *Notice of Application*. The only possible reference is to the draft *Preliminary Mitigated Determination of Nonsignificance* which contains only five (5) general and superficial requirements.

Applicant has proposed a wide range of purported mitigation measures that have direct bearing on environmental review processes. None of those proposed mitigation measures are identified or listed in either the NOA or the preliminary MDNS. The Notice of application should be withdrawn and reissued with a complete itemization of all contemplated mitigation measures.

As a final point, an essential component of environmental review under the State Environmental Policy Act (SEPA) is to identify specifically significant adverse impacts to the environment in order to provide a foundation or basis for mitigation. A land use applicant is required to provide specific mitigation measures it requests to be considered in the context of environmental review. The applicant in this case has not provided that itemization or list of mitigation measures.

B. Comments on Amended SEPA Checklist.

Applicant provided a superficial and incomplete amendment to the SEPA checklist as it relates to project components included in the revised and modified land use application.

1. Incomplete information on soil study and analysis. The amended SEPA checklist includes the following response to soil types found on the site.

- c. What general types of soils are found on the site (for example, clay, sand, gravel, peat, muck)? If you know the classification of agricultural soils, specify them and note any agricultural land of long-term commercial significance and whether the proposal results in removing any of these soils.

Well graded gravel.

The response is incomplete and inadequate with respect to soil types and conditions on the project site. Applicant proposes a massive wastewater treatment pond and septic drain fields within areas of known high water tables and gravelly soils. Applicant is required to prepare a soil survey for areas of wastewater treatment and land applications as prepared by licensed hydrologist for the project site. This information is necessary to evaluate impacts to groundwater, suitability of soil for land application, and development of the wastewater treatment plan and associated facilities.

2. Applicant provides inaccurate and incomplete information with respect to filling, excavation, and grading for the project. Applicant provides the following answer to the following question:

- e. Describe the purpose, type, total area, and approximate quantities and total affected area of any filling, excavation, and grading proposed. Indicate source of fill.

There will be minimal grading and fill for site roadways, building foundations, and limited excavation to install the proposed aerated treatment pond.

This answer is inaccurate and incomplete. In other materials provided, applicant identifies that the wastewater treatment pond will occupy 50,880 square feet (1.17 acres) with cuts totaling 14,120 cubic yards and fill of 11,700 cubic yards. The wastewater treatment pond will have inside slopes of 3:1 and a depth of fourteen (14) feet. Additional side slopes will be prepared surrounding the facility. As an additional note, Applicant states that this aerobic storage pond will provide over 180 days of storage and treatment prior to disposal on the land treatment area.

Applicant fails to provide necessary information about this aspect of the plan or how Applicant will reduce possible adverse impacts such as attracting wildlife (birds, scavengers, predators) onto the property, increased odors, erosion, pollution, and other possible adverse impacts to water, soil, and air.

No grading information is prepared for roadways, processing plant, parking lot or holding pens. Three "boring locations are identified" but no associated material provided with respect to the purpose, scope and extent of such borings and reports. Applicant also makes an indication of a proposed swale alongside the proposed facility, with no information as to grading or excavation.

3. Applicant provides no specific information regarding land application of wastewater.

The Amended SEPA checklist contains no information regarding land application of wastewater. In related materials, applicant states:

The totaling mixed water is then land applied on rotational tall grass land on the applicant's adjacent 28.9⁵ acres for during the growing season of the crop through gated gravity irrigation pipe. This will be supplemental irrigation to the current irrigated grass land. It is estimated that the facility will produce 9.6 acre-feet annually of wastewater. With evaporation in the pond this will be reduced to 7.6 acre-feet annually. This will be the equivalent of 3.1-inches/acre of wastewater applied to the land.

Applicant provides no information with respect to wastewater content, processes, or initial and final effluent levels through pretreatment processes.

It is stated that "...[t]his treated water will be applied and both soil infiltration rates and agronomic required rates on water samples taken quarterly and annual soil samples." No information or data is provided with respect to applicable soil infiltration rates, agronomic required rates, or applicable effluent standards including BOD, total suspended solids (TSS), pH, Ammonia-N, TKN, phosphorus, potassium, conductivity, and flow.

Applicant provides no information or studies as to post treatment water contents and irrigation measures, locations and concentrations. Land application should identify location, proximity to ground and surface waters and crop rotations. No evidence is provided regarding impacts to existing irrigation water (KRD) or water quality implications to existing irrigation water.

Finally, Applicant fails to address Lyle Creek, a fish-bearing creek with native, but intrusive, vegetation. The vegetation results in adverse flood impacts that may directly affect the site location and the property on which it sits.

⁵ This is incorrect. Applicant's adjacent property is 24.47 acres. Unfortunately, discrepancies and inconsistencies seem to persist throughout the entirety of Applicant's revised application and 11.29.2023 Response.

As a final point, Applicant does not have any plan currently secure mitigation water to offset and allow for the permitting of a new water right in order to offset increased water demands at the site location.

4. Applicant provides no specific information on pretreatment processes and facilities.

Applicant has provided no information in the amended SEPA checklist with regard to the specific preliminary and primary treatment processes. A generalized reference is made to "...a wastewater treatment system recommended by the Washington Department of Ecology for small scale meat processing plants."⁶

Applicant proposes a land application that will include grease interceptors to remove grease and solids prior to transfer to an aerobic storage pond that will provide over 180 days of storage and treatment prior to disposal on the land treatment area, "in addition to Ecology's standard requirements." First, Applicant fails to define what the actual system will entail. Secondly, the Department of Ecology has made no recommendations to Applicant. Throughout the application, Applicant has indicated that the Department of Ecology has made various recommendations (for instance, that it "will employ a wastewater treatment system recommended by the Washington Department of Ecology for small scale meat processing plants" and that the facility's "pond will utilize a double lined pond with leak detection as recommended by Department of Ecology.") The Department of Ecology has denied making any such recommendations for this facility. This is simply misleading and inaccurate.

Applicant has attached to its response letter of November 29, 2023, a document entitled "Wastewater Treatment System" purportedly employed by Sunnyside Meats, Inc.⁷ The comment materials identify the operating system as an "Orenco AdvanTex AX 20 System." Applicant provides no details or supporting documentation with respect to the proposed waste treatment system.⁸

⁶ There are two types of individual permits depending on the location of the facilities discharge:

- National Company Pollutant Discharge Elimination System (NPDES) permits cover discharge to surface waters.
- State Waste Discharge permits (SWD) regulate discharge to either groundwater or publicly-owned treatment works (POTW).

Both permits include (1) discharge limits for specific pollutants; (2) monitoring and reporting requirements; and (3) operation and maintenance requirements.

⁷ Sunnyside Meats, Inc., is a corporation operating a small-scale meat packing facility in southwest Colorado. The referenced facility should not be mistaken for Sunnyside Meat Packers, LLC, a Washington limited liability company with principal office at 10 Maple Grove Road, Sunnyside, WA. 98944 (UBI No: 604 645 074).

Additionally, one would believe that a report predicated on measurements and calculations would have their input data correct. This report presents discrepancies in its calculations and misrepresents the site location being located on 16.26 acres of land when it is located on 14.90 acres. While this may be minor, it does call into question the credibility of this report.

⁸ The source of this document is not identified and appears to relate to an installation that occurred more than twenty (20) years ago. It is appropriate to note that Applicant's consultant – Christopher Fuller – was employed by Sunnyside Meats in Durango, Colorado in 2010. A copy of Chris Fuller's biography is attached at *Attachment D*. The biography discloses that Fuller's "...first involvement in meat processing began by working his way up to quickly become the Plant Manager at Sunnyside Meats in Durango, Colorado." *Attachment D*, p. 2. No specific references are provided to establish knowledge or

Orenco Systems, Inc., is an Oregon corporation with offices at 814 Airway Avenue, Sutherlin, Oregon 97479. See www.orenco.com. **Attachment B.** Orenco Systems manufactures wastewater systems and technologies including the “Orenco AdvanTex AX 20 System”. **Attachment C.** The “Orenco AdvanTex AX 20 System is a system designed for household residential use. It is not a “world class” treatment system designed for commercial meat packing facilities.

The SEPA checklist requires the full and complete description of the proposed Wastewater Treatment System together with supporting documentation related to treatment processes, system design and improvements, installation areas and impacts to soil and groundwater, and land application of partially treated wastewater. This is missing.

Applicant has provided no information as to expected contaminant typers or contamination levels. This is necessary information in understanding wastewater processes and land applications. Not only has the Applicant neglected to include information as to contaminant types and levels, but Applicant has failed to disclose any detailed plan or mechanism for treating these expected contaminants. Lyle Creek abuts Applicant’s property and will receive negative impacts as a result of inevitable contamination.

In his “3BR Custom Cuts, LLC Wastewater Treatment Information” report prepared by DeHaan, Grabs & Associates, LLC, Applicant has offered information that the wastewater generated flows by gravity from harvest, fabrication, and holding pens to a pretreatment sump that will then pass waste through a set of 1,000 grease interceptors that will continuously discharge to the proposed aerobic plant. Through this process, Applicant contends that the projected removal efficiency of the grease interceptors is 50% for Biological Oxygen Demand (BOD) and Chemical Oxygen Demand (COD) and 50% for Total Suspended Solids (TSS) and 60% Fats Oil and Greases (FOG). However, Applicant fails to identify what these waste levels are in the first place. Applicant needs to provide a complete listing of anticipated waste levels, including what the contaminants are and what the levels are of each contaminant. These percentages mean nothing without the complete picture. If the levels are excessive, then 50% and 60% may not be sufficient to mitigate the possible harm. Applicant does not identify what levels are appropriate or provide any assurance that this mechanism will achieve the identified, appropriate, levels.

In his “Summary” to the “3BR Custom Cuts, LLC Wastewater Treatment Information” report, Applicant states that “[t]he proposed treatment system is recommended by the Department of Ecology for a small-scale processing facility of this kind.” I spoke with an individual at the Department of Ecology who is responsible for obtaining, reviewing, and approving or denying wastewater discharge permits for meat processing facilities of this kind. This individual confirmed that the Department of Ecology has not received an application for a wastewater discharge permit from Applicant. A wastewater discharge permit is required when a facility, such as Applicant’s proposed facility, disposes of wastewater into any surface or groundwater. In fact, the Department of Ecology has not received a permit application or general plan for wastewater management and treatment from Applicant. Had an application been submitted to the Department of Ecology, the Department would consult with an expert hydrogeologist for review and

expertise with respect to development, construction and operation of Wastewater Treatment Systems and no specific designs were provided for this project.

analysis. Again, this is a high water area that requires expert hydrogeologic analysis of groundwater, soil, and other aspects of hydrogeological morphology. Moreover, Kittitas County has regularly required that test holes and monitoring be conducted in high water areas. There is no information provided by Applicant that this is being done. Simply put, the County needs a report from an expert hydrologist in order to make a determination on a land use application such as this. There is no such report. There is simply too many unanswered questions – still too much that we do not know of Applicant’s land use applicant that we need to learn still.

5. Applicant provides inconsistent information regarding traffic impacts in the area. To begin, Applicant provides no specific transportation or trip generation calculations, concurrency analysis, or parking standards.

In his revised application, Applicant states that “[n]o preexisting noise conditions are expected to affect this project” as it pertains to traffic, equipment, and operation. Yet, Applicant expects heavy equipment and general equipment noise along with vehicle traffic within the facility’s operation hours which will be from 6:00 AM to 4:30 PM Monday through Friday.⁹

Wilson Creek Road provides the only access to and from the site location, yet Applicant expects “50 vehicular trips a day with 80% employees to and from work and 20% cattle drop offs.”¹⁰ Applicant ignores fundamental traffic analysis. A Transportation Impact Analysis (TIA) should be prepared by a licensed traffic engineer.

According to the revised application, Applicant expects to be holding “less than 30 cattle at a time, for just a few hours, in pens on less than 1-acre” with an expanded interior refrigerated room that will hold inedible materials (offal) in sealed drums, “for frequent pick-up.”

The SEPA checklist contains no specific information regarding existing road conditions including Wilson Creek Road. There is no analysis of truck turning movements in and out of the facility or information pertaining to current road condition and capacity. The submitted materials do not provide adequate information to evaluate fire apparatus access including road width, corners, and service areas. It does not appear that the original site plan complies with applicable International Fire Code (IFC) standards for fire apparatus access facilities.

6. Applicant provides no information with respect to the proposed holding pen. Applicant makes generalized comments about a holding pen with capacity for at least thirty (30) animals. The materials do not disclose the precise dimensions of the holding pen, loading and unloading facilities, or manner of holding pen construction other than vague reference to concrete floors. No information is provided with respect to waste processing, treatment, or facilities. There is a suggestion that waste from

¹⁰ Applicant contends that “there are currently no designated parking spaces on the lot” for the completed project, yet clearly designates a parking lot on attachments C3.1–3 of Applicant’s 11.29.2023. This is but one more example of the inconsistencies and misrepresentations that persist in Applicant’s materials.

the holding pen will simple be conveyed to the wastewater pond. Applicant needs to identify waste treatment processes, effluent content, and anticipated treatment levels.

Wilson Creek Neighbors reserve the right to provide and supplement these comments following a more complete review of the application materials.

Very truly yours,
MEYER, FLUEGGE & TENNEY, P.S.


James C. Carmody


Pardies Roohani

- Attachment A: Kittitas County COMPAS Map for Assessor Parcel No. 214534
- Attachment B: Orenco Systems, Inc.
- Attachment C: Orenco AdvanTex AX 20 System
- Attachment D: Chris Fuller's Biography

ATTACHMENT A

Kittitas County COMPAS Map



Date: 1/5/2024

1 inch equals 752 feet



Disclaimer:
 Kittitas County makes every effort to produce and publish the most current and accurate information possible. No warranties, expressed or implied, are provided for the data, its use, or its interpretation. Kittitas County does not guarantee the accuracy of the material contained herein and is not responsible for any use, misuse or representations by others regarding this information or its derivatives.

Kittitas County GIS

ATTACHMENT B

[Home \(https://www.orenco.com/\)](https://www.orenco.com/)

[Applications](#)

[Products \(https://www.orenco.com/products\)](https://www.orenco.com/products)



[Resources](#)

[Training \(https://www.orenco.com/training\)](https://www.orenco.com/training)

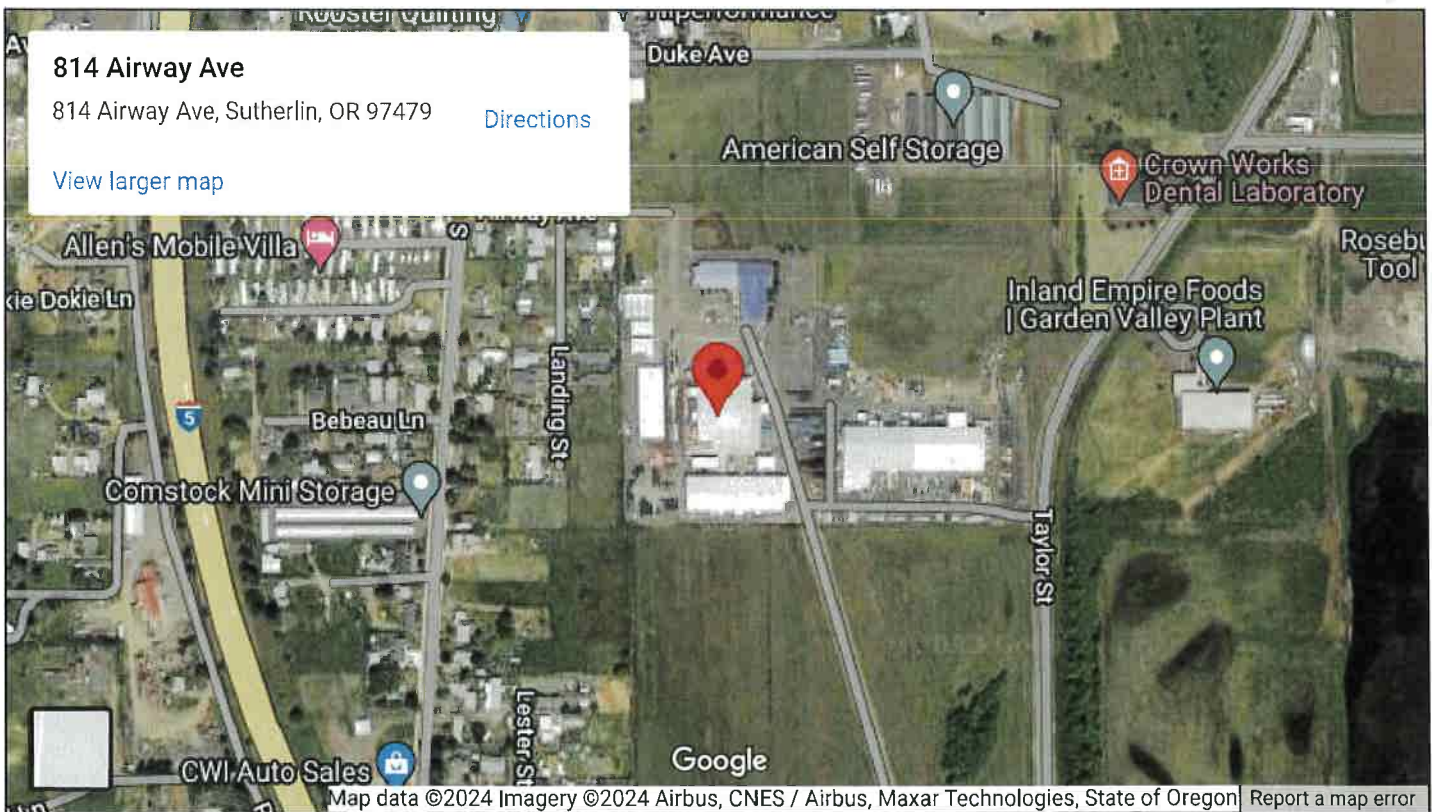
[Distributor Locator \(https://www.orenco.com/distributor-locator\)](https://www.orenco.com/distributor-locator)

[About Us \(https://www.orenco.com/about-us\)](https://www.orenco.com/about-us)



Contact

[Home](#) / [New Products \(/newproducts\)](#) [International \(/international\)](#)
[About Us \(/https://www.orenco.com/about-us\)](#) [Contact \(https://www.orenco.com/about-us/contact\)](#)



Protecting the World's Water

[Learn more about us > \(/about-us\)](#)

[Home \(https://www.orenco.com/\)](https://www.orenco.com/)

[Applications](#)

[Products \(https://www.orenco.com/products\)](https://www.orenco.com/products)

[Resources](#)

[Training \(https://www.orenco.com/training\)](https://www.orenco.com/training)



Our Address

[Distributor Locator \(https://www.orenco.com/distributor-locator\)](https://www.orenco.com/distributor-locator)

814 Airway Ave

Sutherlin, OR 97479 <https://www.orenco.com/about-us>

United States



Phone & Fax

Toll-free: (800) 348-9843
(tel:8003489843)

Phone: +1 (541) 459-4449

Fax: (tel:5414594449)

+1 (541) 459-2884

(tel:5414592884)



E-mail (/inquiry)

Protecting the World's Water ... Every. Single. Day. (/about-us)

(800) 348-9843 (tel:8003489843)
+1 (541) 459-4449 (tel:5414594449)

Home (<https://www.orenco.com/>)

Applications

Products (<https://www.orenco.com/products>)

Resources

Training (<https://www.orenco.com/training>)



Distributor Locator (<https://www.orenco.com/distributor-locator>)

About Us

About Us (<https://www.orenco.com/about-us>)

Since 1981, Orenco Systems, Inc. has researched, designed, and manufactured innovative onsite and decentralized wastewater collection and treatment technologies. Our solutions include community collection systems (/applications/municipal), advanced secondary treatment systems (/products/treatment-systems), watertight fiberglass tanks (/products/gravity-pump-products/basins-and-tanks), and in-tank pumping and filtration systems (/products/gravity-pump-products/pump-vaults-and-packages). We also manufacture high-quality standard, custom, and OEM controls, along with state-of-the-art fiberglass buildings, tanks, and enclosures.

Stay Connected



([https://visitor.r20.constantcontact.com/d.jsp?](https://visitor.r20.constantcontact.com/d.jsp?llr=c8tn7kqab&p=oi&m=1117056847714&sit=7ync5gvib&f=3c2d0b40-6a72-4b51-bf8f-e30534a1bb85)

[llr=c8tn7kqab&p=oi&m=1117056847714&sit=7ync5gvib&f=3c2d0b40-6a72-4b51-bf8f-e30534a1bb85](https://visitor.r20.constantcontact.com/d.jsp?llr=c8tn7kqab&p=oi&m=1117056847714&sit=7ync5gvib&f=3c2d0b40-6a72-4b51-bf8f-e30534a1bb85))

Sign up now and become one of the first to know about new products, upcoming trainings, and industry news.

Copyright 2024 by Orenco® Systems : Terms Of Use (/terms) : Privacy Statement (/privacy)

Website hosted by Foremost Media® (<https://www.foremostmedia.com>) :

Login (<https://www.orenco.com/login?returnurl=%2fabout-us%2fcontact>)

ATTACHMENT C

AdvanTex® Treatment Systems

AX20

Manufactured by **Orenco Systems**®, Inc.



AdvanTex® is one of the most energy-efficient, sustainable wastewater treatment systems available for household use. The filter unit is flush to the ground and blends into landscaping.

Reliable, Energy-Efficient Treatment For Residential Wastewater



Applications:

- Single-family homes
- Small commercial properties
- New construction, repairs
- Tight lots, other site constraints
- Poor soils, shallow bury
- Stringent permit requirements
- Nitrogen reduction, disinfection
- Surface discharge

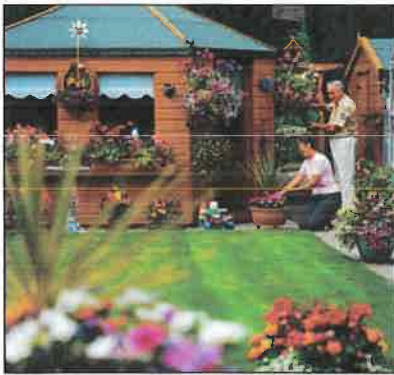
AdvanTex® – Treatment Systems

Finally! Residential Wastewater Treatment – That Works!

Orenco's AdvanTex® Treatment Systems are the ideal solution for environmentally sustainable treatment of residential wastewater flows.

Outstanding Wastewater Treatment

Unlike other onsite wastewater treatment technologies, AdvanTex provides consistent, reliable treatment under real-world conditions. Other systems work okay in a controlled testing environment, but don't hold up to normal household use. AdvanTex does. AdvanTex Treatment Systems process and discharge small amounts of treated wastewater throughout the day. They produce effluent so clean it can be reused for drip or subsurface irrigation (subject to local regulations), or discharged to shallow, inconspicuous trenches.



Fits Small Yards

AdvanTex Treatment Systems require very little space. The filter unit is 7.5 ft x 3 ft x 2.5 ft (2286 mm x 914 mm x 762 mm), small enough to fit under a deck or on top of the processing tank. And some jurisdictions allow a reduction in drainfield area with AdvanTex. So AdvanTex is ideal for small sites, or for homeowners who simply want more use of their yard.

Low Maintenance

AdvanTex Treatment Systems are designed to be easily maintained with an annual service call, thanks to their accessible, cleanable filters and media. And their high-quality, high-head pumps last 20 years or more!* Plus, AdvanTex filters protect your drainfield.

**As seen in the Elkton, Oregon, sewer system.*

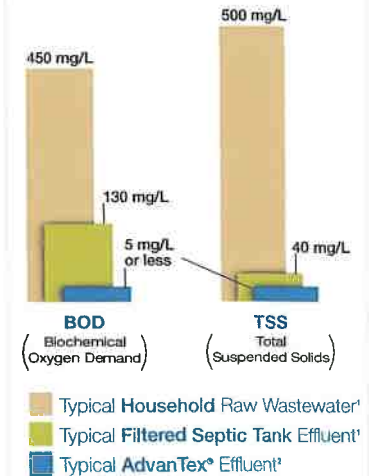
AdvanTex turns household wastewater into clear effluent you can reuse for subsurface irrigation. (subject to local regulations)



AX20 shown here.

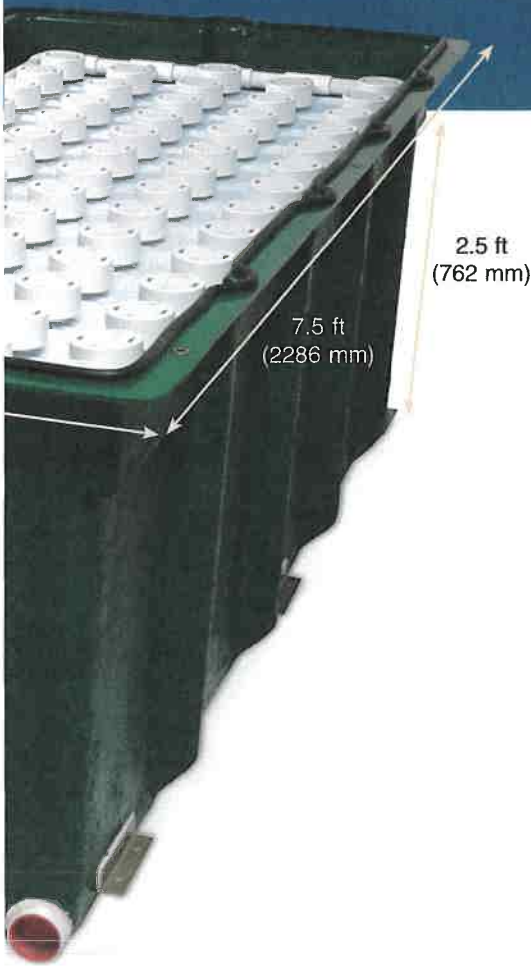
In addition to being compact, AdvanTex® Treatment Systems are easy to operate and maintain. No power-hungry, noisy blowers. No activated sludge to manage or pump. No discharge of untreated sewage during peak flows or emergencies.

AdvanTex® Treatment Systems make raw wastewater up to 98% cleaner ... consistently producing effluent in the 5/5 mg/L range



¹ Source: Derived from *Small and Decentralized Wastewater Management Systems*, Crites & Tchobanoglous, McGraw-Hill, 1998, p. 183.

² Actual performance results, based on a six-month accumulative average from NSF International testing on the AX20N at 500 gpd (1900 L/d), using composite sampling.



AdvanTex Gives You Peace of Mind

Orenco's AdvanTex Treatment Systems are not just a product. They're part of a comprehensive program, for homeowners' peace of mind.

Authorized Dealers and Trained Installers

AdvanTex Treatment Systems are sold by authorized Dealers, who provide ongoing support and warranty service. Dealers ensure that AdvanTex Treatment Systems are set in place by trained installers, following Orenco's instructions.

Trained Service Providers

Like any onsite technology, your AdvanTex Treatment System benefits from regular maintenance by a trained service provider, following Orenco's instructions. Field maintenance report forms are digitally archived for future reference.

Complete, Carefully Engineered Package

Your AdvanTex Treatment System comes as a totally pre-manufactured package, including AdvanTex textile filter, Biotube® pumping package, and "smart" control panel. AdvanTex can be installed on most lots in less than a day.

Low Routine Maintenance Costs

AdvanTex Treatment Systems are easy to service and clean. Since maintenance is minimal, so are the long-term costs. Each system comes with a Homeowner's Manual, with tips for preventive maintenance. And all systems are sized to allow for a minimum of 24 hours of wastewater storage, at average daily flows. So operators can provide "emergency" service during normal working hours, keeping service costs down.

Low Power Costs

AdvanTex uses very little power ... about \$3.60 per month (based on an average cost of thirteen cents per kilowatt-hour). Competing products use 2-5 times that much!¹

Service Provider Notifications

AdvanTex Treatment Systems that are equipped with VeriComm® Control Panels automatically notify service providers of irregular conditions.

Tamper-Resistant

The lid of the AdvanTex filter is affixed with recessed bolts, making it very tamper-resistant.

Warrantied

Orenco Systems®, Inc. provides a limited, multi-year warranty on all materials and workmanship. Length of warranty varies by region, but is at least three years.

Round-the-Clock Monitoring

Your AdvanTex Treatment System may include a control panel with a remote telemetry unit and a round-the-clock, web-based monitoring system, supervised by your service provider. You'll have even more peace of mind, knowing that the VeriComm® Monitoring System is continually and automatically verifying the operation of your system.



Onsite Treatment of Residential Wastewater

For Every Residential Site

There's a standard AdvanTex Treatment System model for every site condition, design flow, and regulatory requirement.

AdvanTex Treatment Systems are particularly well suited for ...

- small sites
- failing systems
- poor soils
- nitrogen reduction
- environmentally sensitive sites
- stringent treatment standards
- pretreatment of moderately high-strength waste



Deschutes County, Oregon

"I specified an AdvanTex Treatment System for a cluster of 12 luxury homes in the Metolius River Resort, along a premier trout stream in eastern Oregon. AdvanTex worked well because the site has an extremely small footprint and the system was easy to install. Also, the treatment unit is right in front of the resort's office, so it was super important that there be absolutely no smell, and there isn't. Plus, we didn't have to search for the right treatment media, since it's all included. I would use AdvanTex any place you'd use a conventional recirculating filter."

Steve Wert, CPSS, WWS
Wert & Associates, Bend, Oregon

Tucson, Arizona

"Nearly 1,000 AdvanTex Treatment Systems have been installed in Arizona, primarily due to poor soils, seasonal high water tables, and/or nitrogen in the groundwater. In Tucson, homeowners and their treatment system designers have also had to deal with limiting site constraints, shallow rock shelves, and small building envelopes. The AdvanTex system, followed by a subsurface drip system, was the answer. Plus, the installed systems go almost unnoticed in yards and landscaping."

Todd Christianson,
Premier Environmental
Products, LLC



Alberta, Canada

"We've installed about 500 AdvanTex Treatment Systems for all sizes of homes, and, typically, the treated wastewater looks just like water. Our winter temperatures can be as low as -38° F (-39° C). In the middle of December, we started up an AdvanTex Treatment System on a 13,000 ft² (1200 m²) home that averages 1200 gpd (4500 L/d). Two weeks after start-up, the owners entertained 30 family members and guests for a full week. It worked great!"

Bruce Silvester, Onsite Specialties, Inc.

Newport, Rhode Island

"I spent six years looking for the right wastewater system for my second home, which is on a small island. Even with seasonal flows, our AdvanTex Treatment System is working great . . . so great, I decided to become a dealer! We entertain often, so we use a lot of water, but we've never had a problem. And the system was easy to transport and install."

Peter Kent, Atlantic Solutions, Ltd.



AdvanTex® – Treatment Systems



Orenco Systems is owned and managed by engineers who develop wastewater systems that work — systems based on sound science.

Clockwise from left:
Eric Ball, P.E., Jeff Ball, P.E., Hal Ball, P.E.,
(front) Terry Bounds, P.E.



AdvanTex® Treatment System
AXN Models meet the
requirements of NSF-ANSI
Standard 40 for Class 1 Systems.



Powered by
Franklin Electric



814 Airway Avenue, Sutherlin, OR 97479 USA

T: 800-348-9843
T: 541-459-4449
F: 541-459-2884

www.orenco.com

ABR-ATX-1

Rev. 5.0, © 03/19, Orenco Systems®, Inc.

Carefully Engineered by Orenco

Orenco Systems has been researching, designing, manufacturing, and selling leading-edge products for decentralized wastewater treatment systems since 1981. The company has become an industry leader, with about 350 employees and about 330 points of distribution in North and Central America, Australasia, Europe, and Africa. Our systems have been installed in more than 70 countries around the world.



Your health is our priority. At Orenco Systems, we are committed to "Protecting The World's Water."



Orenco maintains an environmental lab and employs dozens of civil, electrical, mechanical, and manufacturing engineers, as well as wastewater treatment system operators. Orenco's technologies are based on sound scientific principles of chemistry, biology, mechanical structure, and hydraulics. As a result, our research appears in numerous publications and our engineers are regularly asked to give workshops and trainings.

For More Information

For a short video that explains how AdvanTex treatment works, go to ...
www.orenco.com/training/videos and scroll to "How the AdvanTex System Works."

Distributed by:

ATTACHMENT D



Chris Fuller is the owner and principle advisor at Fuller Consulting. Through Fuller Consulting, Chris helps small meat businesses achieve their goals by producing high quality meat products and services under USDA or state inspection with a focus on product quality, worker safety, humane handling of livestock, and food safety. Efficiency and ease of operation are always worked into each client's plan. Each project is analyzed to ensure profitability during the planning phases.

Chris holds an Associates Degree from Johnson and Wales

University in Culinary Arts and a BS in Anthropology from Fort Lewis College in Durango, CO. Believing in fostering a strong community of butchers in the US, Chris was an early member of the recently defunct Butcher's Guild and now a member of the Butchers of America. Chris is always striving to becoming a better butcher and meat advocate. He is Lean Six Sigma certified through Villanova University.

His first involvement in meat processing began by working his way up to quickly become the Plant Manager at Sunnyside Meats in Durango, Colorado. Always seeking new challenges, Chris moved on to become the GM of a new small meat processing facility in the rural mountains of Virginia.

Beginning in January of 2012, Chris designed, opened and operated the federally inspected Alleghany Meats plant in Monterey, VA. After the

successful launch of Alleghany Meats (which included hiring, training, branding, and establishing the business), and a stint in Los Angeles with renowned chef Christian Page, Chris moved to San Diego County where he now consults on various projects for small processors. As a consultant, he has worked with clients on everything from mobile slaughter units to 100 head per day slaughter and fabrication plants.

Chris lives on 8 acres in the mountains of San Diego and BBQs regularly on his four (for now, maybe five soon) grills. When he's not cutting, smoking, grilling or otherwise working with meat, he can be found raising animals, gardening, watching sports or adventuring outside with his family and dogs.

Recent projects

- Walk-through and review of a plant being considered

for purchase.

- Redesign and reopening, including securing federal inspection, of a defunct slaughterhouse in Northern CA.
- Design of a new slaughter plant in the Pacific Northwest including slaughter, fabrication, and value added production.
- Reworking a HACCP plan for a small slaughterhouse and assisting in their first successful federal review.
- Designing a multi-species nano-scale plant for on-farm processing and further processing.
- Writing HACCP plans for a restaurant program that was breaking down whole animals and making sausage from scratch.

Awards & Memberships

2023 - present member, The Butchers of America

2023 - present member, American Association of Meat Processors, additional membership and sponsor of KY Assoc. of Meat Processors

2011 - 2023 - Member, The Butcher's Guild

2012 Community Economic Development Award - Alleghany Meats, Southern Economic Development Council

2010 Small Business of the Year - Sunnyside Meats, Durango Chamber of Commerce

Media

2-25-2022 *Chilled to the bone*, The National Provisioner

1-22-2021 *Committing to improved slaughter standards*, The National Provisioner

3-14-2017 *Mixers and blenders: Food safety in the mix*, The National Provisioner

6-9-2015 The New Livestock
Farmer, Contributor of livestock
cut sheets for a book written by
Rebecca Thistlethwaite and Jim
Dunlop

8-19-2013 LA I'm Yours, Blog
showing love for Chris and Chef
Tione's Tuesday Grill-outs at
Short Order LA

4-17-2013 Cochon 555 LAX,
LA Magazine pre-event
coverage

3-14-2013 Cochon 555
DC eater DC write up on the
Cochon event

9-2-2012 Know Your Butcher,
an article for Cooking Up a
Story featuring Chris Fuller, by
Rebecca Thistlethwaite of the
blog Honest Meat

7-1-2012 Good Meats, Feature
in Edible Blue Ridge (central VA
Edible Communities magazine)
summer 2012 issue about
Alleghany Meats

6-24-2012 *Slaughterhouse helps Highland farmers make their living*, Front page of the Sunday Staunton Newsleader about opening Alleghany Meats

9-14-2011 Carving for the Carnivorous, Durango Herald article on Camp Carnivore, an introduction to meat cutting class taught by Chris in Durango, CO

12-07-2011 Dishing it Out, Durango Herald article on Links and Drinks, a sausage-making and cocktail pairing class taught by Chris in Durango, CO

3-30-2011 Cochon 555 Butchery Battle, Westword blog's coverage of the Cochon 555 2011 Denver butcher competition

Events

2014 Chef's Collaborative Breakout, Boulder, CO: Demonstration of innovative approach to fabricating and cooking grass fed middle meats.

2014 Speaker, NV Small Farms Conference, Reno, NV: Presentation on food safety and understanding regulations as an on-farm meat business.

2013 Eat Real Festival, Oakland, CA: Runner up in the Master Case Competition; Demonstrated 6 ways to fabricate whole chickens; Demonstrated how to breakdown a whole hog, head-on.

2013 Guest Chef & Butcher partnering with Chef Christian Page at Cochon 555 Los Angeles, CA.

2013 Planned and executed weekly whole animal roasts on the patio of Short Order featuring California sourced pork, lamb, and beef.

2013 Butcher demonstration at Cochon 555 Washington, DC.

2011 Finalist in a head to head butcher competition at Cochon 555 Denver.

2010 Guest Lecturer, Fort Lewis

College: Lectured on the
importance of developing
personal relationships in selling.



Small vertical text or logo on the right edge of the page.