To: Rios, Gerardo[Rios.Gerardo@epa.gov]; Chen, Eugene[Chen.Eugene@epa.gov]; Christenson, Kara[Christenson.Kara@epa.gov]; Alkon, Margaret[Alkon.Margaret@epa.gov]
From: McKaughan, Colleen
Sent: Wed 4/19/2017 2:47:49 PM
Subject: FW: Petition for Environmental Sampling and Public Health Assessment
Hickmans Summary of NH3 and H2S preliminary Modeling for Hickman.doc
Hickmans Replacement Continuous Release Reporting Forms- Hickman Family Farms.pdf
Hickmans Estimation of Emissions from Arizona Layer Sites Heber 4-7-17.pdf

Steve Brittle also sent me this but this would be EPCRA or TRI, wouldn't it?

From: Steve Brittle [mailto:smbrittle@yahoo.com]
Sent: Tuesday, April 18, 2017 10:37 PM
To: McKaughan, Colleen <McKaughan.Colleen@epa.gov>
Subject: Fw: Petition for Environmental Sampling and Public Health Assessment

The Hickman's continuous release report is attached, as well as our expert's report, and ADEQ's modeling and calculations

----- Forwarded Message -----

From: Don't Waste Arizona <dwaz@fastq.com>

To: "svr1@cdc.gov" <svr1@cdc.gov>

Cc: "bgerhardstein@cdc.gov" <bgerhardstein@cdc.gov>

Sent: Tuesday, April 18, 2017, 10:34:34 PM MST

Subject: Petition for Environmental Sampling and Public Health Assessment

Via Email to svr1@cdc.gov and bgerhardstein@cdc.gov and US Mail

April 17, 2017

Sven Rodenbeck, Ph. D.

Environmental Engineer

Petitions Coordinator

Agency for Toxic Substances and Disease Registry

4770 Buford Hwy, NE

Atlanta, GA 30341

Re: Petition for Environmental Sampling and Public Health Assessment

Don't Waste Arizona (DWAZ) is a state-wide non-profit environmental organization dedicated to the protection and preservation of the environment in Arizona. DWAZ is a 501 c 3 charitable organization with members in Tonopah and Arlington, Arizona. DWAZ is especially concerned and involved with emergency response to chemical incidents.

STOPP is a non-profit organization formed to protect and educate the public about the pollution from the Hickman's Family Farms facility in Tonopah and Arlington, Arizona. STOPP has members that live, work, and attend school in close proximity to both Hickman's locations.

DWAZ and STOPP recently became aware that there are large amounts of ammonia being released by the Hickman's Egg Ranch facilities in Arlington and Tonopah, Arizona. In October 2015, after an air permit hearing at the Arlington Elementary School, located at 9410 S 355th Ave, Arlington, AZ 85322, about three miles west of the Hickman's Family Farms' Arlington facility, a strong, almost overcoming odor of ammonia was detected. There is also a residential community very near the school where many students live that is even closer to the Hickman's Arlington facility.

In October 2016, the Arizona Department of Environmental Quality (ADEQ) modeled the dispersion of ammonia from the Hickman's facilities, and released the modeling to the public in March 2017. But there are questions about whether the ammonia releases were modeled using

the correct amounts of ammonia being released from the Hickman's Arlington and Tonopah facilities. The modeling does show that areas around Arlington and the Arlington Elementary School are above the screening level for ammonia exposure. An MRL of 0.1 ppm has been derived for chronic-duration inhalation exposure (365 days or more) to ammonia by ATSDR, and an MRL of 1.7 ppm has been derived for acute-duration inhalation exposure (14 days or less) to ammonia. It also showed that areas in and around Tonopah Arizona show levels that are above the screening level for ammonia. These numbers cited in the modeling give STOPP and the Tonopah community reason for concern because there are people who work and live adjacent to the Hickman's Tonopah facility, up to 500 within a one-mile radius, and that ammonia levels are above the screening for chronic ammonia exposure in that locale also.

There are three different reports regarding the amounts of ammonia being released at these Hickman's facilities. Hickman's Egg Ranch has just recently filed a continuing release notification for ammonia with the USEPA that has a different amount than ADEQ's. Also, an expert for an EPCRA enforcement action commenced by DWAZ has calculated different and very much higher amounts of these daily ammonia releases.

Meanwhile, there are health concerns from residents, students, parents, workers, and other members of the public. People are reporting symptoms that correlate with chronic ammonia exposure. There are times when the odor of ammonia is often detectable, and even quite strong.

We petition ATSDR to determine what the actual local exposures are to the ammonia being released by conducting environmental sampling and to provide a public health assessment based on the results of the air sampling. A copy of the ADEQ ammonia dispersion modeling is attached, as well as the continuous release reports provided by the Hickman's Egg Ranch facilities in Arlington, Arizona, and the report from the expert for the DWAZ EPCRA enforcement action.

Thank you for your consideration in the matter.

Sincerely,

Stephen M. Brittle

President

Don't Waste Arizona

2934 West Northview Avenue

Phoenix, AZ 85051

Dan Mack

Chairman

STOPP

PO Box 1075

Tonopah, Arizona 85354

cc: Ben Gerhardstein, MPH

ATSDR, Region 9

ATTACHMENTS