**To:** Chan, Janice[Chan.Janice@epa.gov]
**Cc:** Robert Phalen[rphalen@hickmanseggs.com]
**From:** Shari Yeatts
**Sent:** Fri 4/29/2016 10:51:10 PM
**Subject:** RE: Hickman's Egg Ranch Request
Chicken Egg Producttion Facility Flow Diagram.pdf
Value Add Letter from CFO.pdf
Manure Barns Example.pdf
2015 and 2016 Employee Work Hours.pdf

Hi Janice,

I have spoken to our Owners and Chief Financial Officer, we seem to have struggled with the value add piece, I have attached a letter from him. Please read and let me know what if anything we are missing on this.

I have also attached the Chicken Egg Production Facility Flow Diagram as promised, I am happy to walk through this with you if you have any additional questions. Here is the link that is embedded into that document.

There are also a couple of pictures of the Manure Drying Barns that we added to our Tonopah facility to ensure that the manure was enclosed keeping the manure dry so that it does not put off the odor that the wet manure may.

You will find the 2015 – 2016 Employee Work Hours also attached.

Please review and give me a call if you have any questions.

Have a wonderful weekend!

**Shari Yeatts**

Compliance Manager

Cell Phone- 623-692-8451

**From:** Chan, Janice [mailto:Chan.Janice@epa.gov]
**Sent:** Thursday, April 28, 2016 10:05 AM
**To:** Shari Yeatts <syeatts@hickmanseggs.com>
**Cc:** Robert Phalen <rphalen@hickmanseggs.com>
**Subject:** RE: Hickman's Egg Ranch Request

Hi Shari,

Thank you for yesterday's call, and thank you for supplying the SCS for the SEP FS chlorinated defoaming eggwash.

Please keep me updated on the status of the calculations of the values added as well as the workhours of employees and employee equivalents. If you have any questions or concerns about the information I've asked for, please let me know.

Thanks,

Janice

**From:** Shari Yeatts [mailto:syeatts@hickmanseggs.com]
**Sent:** Wednesday, April 27, 2016 4:06 PM
**To:** Chan, Janice <Chan.Janice@epa.gov>
**Cc:** Robert Phalen <rphalen@hickmanseggs.com>
**Subject:** Hickman's Egg Ranch Request

Janice,

Thank you for the call today. Attached you will find the SDS list for the ZEP products used in the Shell Egg Processing. Like Robert stated on the call, the chemical used the most in our shell egg processing is the #3547 Chlor Defoaming Egg Wash.

I have attached that SDS as well for your file.

I will have the property flow diagram finished and emailed to you by end of day Friday.

Have a nice evening,

**Shari Yeatts**

Compliance Manager

Cell Phone- 623-692-8451

**From:** Chan, Janice [mailto:Chan.Janice@epa.gov]
**Sent:** Wednesday, April 27, 2016 8:31 AM
**To:** Shari Yeatts <syeatts@hickmanseggs.com>
**Subject:** RE: Hickman's Egg Ranch Request

Hi Shari,

Thank you for the documents so far. I'm curious about the following information:

•□□□□□□□ 2015/2016 number of workhours from employee for each facility – To clarify, this should be the number of workhours from employees and equivalents, which includes nonemployee laborers. Will you send these along by email, or by mail?

•□□□□□□□ Calculations of the value added of the products shipped for each facility – Can you please clarify whether you are mailing these documents via mail? If so, are they being claimed as CBI?

Thank you,

Janice

**From:** Shari Yeatts [mailto:syeatts@hickmanseggs.com]
**Sent:** Tuesday, April 26, 2016 3:32 PM
**To:** Chan, Janice <Chan.Janice@epa.gov>
**Subject:** RE: Hickman's Egg Ranch Request

Hello,

I also just got this in today from Maricopa County.

Talk to you tomorrow,

**Shari Yeatts**

Compliance Manager

Cell Phone- 623-692-8451

**From:** Shari Yeatts
**Sent:** Tuesday, April 26, 2016 2:33 PM
**To:** 'Chan, Janice' <Chan.Janice@epa.gov>
**Subject:** RE: Hickman's Egg Ranch Request

Hi there, I forgot the fertilizer license.

**Shari Yeatts**

Compliance Manager

Cell Phone- 623-692-8451

**From:** Shari Yeatts
**Sent:** Tuesday, April 26, 2016 12:57 PM
**To:** 'Chan, Janice' <Chan.Janice@epa.gov>
**Cc:** Billy G. Hickman <bghickman@hickmanseggs.com>; Glenn Hickman <ghickman@hickmanseggs.com>; Robert Phalen <rphalen@hickmanseggs.com>; Paul Yeatts <pyeatts@hickmanseggs.com>
**Subject:** RE: Hickman's Egg Ranch Request

Hi Janice,

I apologize for the confusion, I try to ask the experts within my company what if anything they would want classified as CBI. My Environmental Program Manager, Robert Phalen advised me that there is nothing, including the permits that would fall under that classification. I appreciate the information below educating me on the regulation, it was helpful.

I am attaching the following documents:

1. Air permits and equipment lists for Hickman's Egg Ranch:

•□□□□□□□ Equipment List and Permit 040136: 32425 W. Salome Hwy, Arlington

•□□□□□□□ Equipment List and Permit 110069: 6515 S. Jackrabbit Trail, Buckeye

•□□□□□□□ Equipment List and Permit 140062: 41625 W. Indian School Rd., Tonopah

Note: We have permit modifications in house for 040136 and 140062. These revisions are currently in progress.

2. Stormwater Pollution Plans – Best Practices

•□□□□□□□ Arlington Facilities

•□□□□□□□ Tonopah Facility

3. ADEQ General Permits for Stormwater Discharge

4. Arlington North, South and Tonopah Egg Licenses

Let's plan on meeting at 9am tomorrow if that works for you, I would like to at least introduce you to everyone and get any next step action items you need to complete the investigation.

Thank you,

**Shari Yeatts**

Compliance Manager

Cell Phone- 623-692-8451

**From:** Chan, Janice [mailto:Chan.Janice@epa.gov]
**Sent:** Tuesday, April 26, 2016 9:03 AM
**To:** Shari Yeatts <syeatts@hickmanseggs.com>
**Cc:** Billy G. Hickman <bghickman@hickmanseggs.com>; Glenn Hickman <ghickman@hickmanseggs.com>; Robert Phalen <rphalen@hickmanseggs.com>; Paul Yeatts <pyeatts@hickmanseggs.com>
**Subject:** RE: Hickman's Egg Ranch Request

Hi Ms. Yeatts,

Permits are generally not CBI, as they are available to the general public upon request. If there are portions of the permits which Hickman would like to claim as CBI because they contain information that would likely result in substantial harmful effects on the business' competitive position, then you may make the CBI claim. If you make such a claim, then please let us know what those harmful effects would be, why they should be viewed as substantial, and an explanation of the causal relationship between disclosure and such harmful effects. EPA's general CBI regulations are found at 40 C.F.R. Part 2, Subpart B.

Thanks,

Janice

**From:** Shari Yeatts [mailto:syeatts@hickmanseggs.com]
**Sent:** Tuesday, April 26, 2016 8:46 AM
**To:** Chan, Janice <Chan.Janice@epa.gov>; Shari Yeatts <syeatts@hickmanseggs.com>
**Cc:** Billy G. Hickman <bghickman@hickmanseggs.com>; Glenn Hickman <ghickman@hickmanseggs.com>; Robert Phalen <rphalen@hickmanseggs.com>; Paul Yeatts <pyeatts@hickmanseggs.com>

**Subject:** RE: Hickman's Egg Ranch Request

Hi, none that have been submitted thus far, the permits may be claimed, I'll let you know.

Shari

623-692-8451

-------- Original message --------
From: "Chan, Janice" <Chan.Janice@epa.gov>
Date: 04/26/2016 8:40 AM (GMT-07:00)
To: Shari Yeatts <syeatts@hickmanseggs.com>
Cc: "Billy G. Hickman" <bghickman@hickmanseggs.com>, Glenn Hickman <ghickman@hickmanseggs.com>, Robert Phalen <rphalen@hickmanseggs.com>, Paul Yeatts <pyeatts@hickmanseggs.com>
Subject: RE: Hickman's Egg Ranch Request

Hi Ms. Yeatts,

Are any of the submitted documents claimed as CBI? If so, can you please identify them?

Thanks,

Janice

**From:** Shari Yeatts [mailto:syeatts@hickmanseggs.com]
**Sent:** Monday, April 25, 2016 5:57 PM
**To:** Chan, Janice <Chan.Janice@epa.gov>; Shari Yeatts <syeatts@hickmanseggs.com>
**Cc:** Billy G. Hickman <bghickman@hickmanseggs.com>; Glenn Hickman <ghickman@hickmanseggs.com>; Robert Phalen <rphalen@hickmanseggs.com>; Paul Yeatts <pyeatts@hickmanseggs.com>
**Subject:** RE: Hickman's Egg Ranch Request

Hi,

I will get them scanned and emailed tomorrow morning.

Thank you,

Shari

623-692-8451

-------- Original message --------
From: "Chan, Janice" <Chan.Janice@epa.gov>
Date: 04/25/2016 5:53 PM (GMT-07:00)
To: Shari Yeatts <syeatts@hickmanseggs.com>
Cc: "Billy G. Hickman" <bghickman@hickmanseggs.com>, Glenn Hickman <ghickman@hickmanseggs.com>, Robert Phalen <rphalen@hickmanseggs.com>, Paul Yeatts <pyeatts@hickmanseggs.com>
Subject: RE: Hickman's Egg Ranch Request

Hi Ms. Yeatts,

I would still like to have a conference call. If it takes much longer than Tuesday afternoon to get the additional documents to me so that I can review them on time for our call on Wednesday morning, then I may want to reschedule to another time. Let's keep it at the currently scheduled time.

Regarding questions about the NAICS code and multi-establishment facility, based on our review of the documents including the value added of the products and our discussion of the processes, we can determine whether the Tonopah and Arlington facilities are multi-establishment facilities.

Regarding the permits, please send me copies of ALL the local, state, and federal permits which Hickman currently has for each facility. If there is a logistical reason (i.e., time, number of pages, etc.) for not providing the permits at this time, please let me know.

If you have any further questions, please let me know.

Thank you,

Janice

---

Janice Chan

U.S. EPA - R9

Enforcement Division

Air & TRI Section (ENF-2-1)

415-972-3308

Chan.Janice@epa.gov

**From:** Shari Yeatts [mailto:syeatts@hickmanseggs.com]
**Sent:** Saturday, April 23, 2016 8:57 AM
**To:** Chan, Janice <Chan.Janice@epa.gov>
**Cc:** Billy G. Hickman <bghickman@hickmanseggs.com>; Glenn Hickman <ghickman@hickmanseggs.com>; Robert Phalen <rphalen@hickmanseggs.com>; Paul Yeatts <pyeatts@hickmanseggs.com>
**Subject:** Hickman's Egg Ranch Request
**Importance:** High

Hello Janice,

I am attaching the following documents for your review. Please let me know on Monday if you feel that a conference call on Wednesday will still be beneficial to answer any

additional questions that you may have. If so, I will be happy to send a calendar invitation with a dial in code.

- Operating flow diagrams for each of our Arlington and Tonopah Facilities
- Food Systems Environmental Sustainability Plan
- SDS List for Every Facility at Arlington and Tonopah (individual SDS available upon request)
- Layer House Cage System (actual # of layers on each facility)
- NAICS code - **112310**

o We have always used this code, but after looking closer at Page 2 on the "Instructions for Applicability for Multi-facility" you sent out, we can see the possible need for Separate NACIS distinctions. The question is does our company fall under the multi-establishment classification? ***"A multi-establishment facility is a facility that consists of two or more distinct and separate economic units".*** Otherwise the code ID#: 112310 is the code we would use. We can clarify this on the conference call with you on Wednesday. I have attached a possible list of NAICS codes for review.

- Permits (list of all permits available, I can send individual permits upon request)

Please note that Hickman's Egg Ranch does not generate any Hazardous Waste at any of our operations.

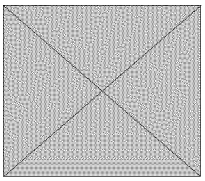
The documentation that will follow early week is:

- 2015/2016 number of workhours from employee for each facility
- Calculations of the value added of the products shipped for each facility

Have a great weekend, and we will talk more next week!

Respectfully,

**Shari Yeatts**

Hickman's Egg Ranch -Compliance Manager

Cell Phone – 623-692-8451 – Office – 623-872-2358