6515 S. Jackrabbit Trail, Buckeye, AZ 85326

To:
Environmental Protection Agency
Janice Chan
Kathleen H. Johnson

Date: 10/7/2016

From:
Shari Yeatts - Hickman's Egg Ranch
6515 S. Jackrabbit Trail
Buckeye, AZ 85326

Re: Cover Letter for HER Request - EPA follow up to 114 Request

Janice,

Attached to this email are the documents that are referenced in the below responses.

1. *This question pertains to Request 1. Clarify the identities of all the process streams for feed, **(DOC # 200).** Waste water, **(DOC # 202).** Dust control, **(DOC # 201).** Air flow, **(DOC # 203).** And other processes applicable to the raising of poultry, processing of eggs, **(DOC # 220- video will be received via mail on the memory stick)** Manufacturing and processing of compost and fertilizer, **(DOC # 205 & DOC # 215).***

2. *These questions are for Request 2.*

*a. Responses to 2.b. and 2.c. Your responses used the language "date construction began" and "birds first installed". Does this language correspond to when the construction of each facility commenced (per Request 2.b.) and when the construction was completed (per Request 2.c.)? **(DOC # 206).***

*b. Responses to 2.e. we asked for information regarding the design capacity of each facility in terms of maximum number of poultry. For 2.f., we asked for the maximum number of poultry actually housed at any time since the construction through May 31, 2016. In document DOC # 0008, does the column labeled "MAX # of HENS PER House EVER Housed" reflect the maximum number of poultry based on the design capacity per Request 2.e, or does that column respond to the actual number birds housed per Request 2.f.? Is each facility designed to house more poultry than indicated in DOC # 0008? **(DOC # 207).***

*c. Responses to 2.h. We asked for engineering designs or calculations used for air flow rates or volumes. The responsive document DOC # 0009 does not include engineering designs or calculations use for air flow rates or volumes. **(DOC # 208), (DOC # 0100 and DOC # 0101).***

*d. Responses to 2.i. We asked for information regarding equipment used to control, reduce or mitigate emissions of particulate matter, volatile organic compounds, and oxides of nitrogen, carbon monoxide, and ammonia. The responsive document DOC # 0010 includes a standard operation procedure (SOP) for the sampling and hydrogen sulfide (H2S) and corrective actions for samples indicating noncompliance. The response seems insufficient in responding to the request. For the purpose of clarity, does Hickman have equipment used to control, reduce or mitigate emissions from the poultry houses, including equipment to control, reduce or mitigate the emission of H2S? What is the compliance plan used as a corrective action in the event there is a sample indicating noncompliance for H2S, as referenced to in DOC # 0010? **(DOC # 211, DOC # 212, and DOC # 213).***

3. *The following question pertains to Request 4*

*a. Responses to 4.f. We asked for equipment used to control, reduce or mitigate emissions of particulate matter, volatile organic compounds, oxides of nitrogen, carbon monoxide, and ammonia for thermal processing of chicken litter and/or manure at the Facilities[1]. Hickman responded with DOC # 0018, which indicates that two rotary dryers manufactured by Vulcan Systems (identified in DOC # 14 to in response to 4.c.) are used to control, reduce or mitigate emissions from thermal processing of chicken litter and/or manure. Do these dryers have any equipment to control emissions from the stack? Also, specify whether there are any additional equipment used to control, reduce or mitigate emissions (if any) from other sources identified under 4c in DOC # 0018, identified sources are identified below: **(DOC # 217)***

i. California Pellet Mill Model 3020
ii. California Pellet Mill Model 7000
iii. Seattle Boiler
iv. Engineered Systems & Equipment EX 10 Drying Oven

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4. The following question pertains to Request 5.

a. Responses to 5.e. We asked for the equipment used for manure turning, including number and purpose of each type of vehicle / device. Hickman provided DOC # 0018. Specify the number of equipment. ***(DOC # 216)***

b. Responses to 5.f. We asked for engineering designs or calculations used for air flow rates or volumes for the ma nure barns, manure windrows, manure turning, and related buildings and structures. Hickman responded with DOC # 0018, which provides emissions estimations for NOx, CO, SO2, TOCs, PM, and CO2 for the rotary dryers manufactured by Vulcan Systems. Specify whether these are emissions from the engine from which the rotary dryer operates only. Does this include emissions from the rotary dryer's stack? Are there engineering designs or calculations used for air flow rates or volumes for the manu re barns, for the manure windrows, and for the manure turning? ***(DOC # 216 & DOC # 215)***

c. Responses to 5.g. We asked for a description of practices used to control, reduce or mitigate emissions from manure barns, manure windrows, manure turning and manure handling operat ions. Hickman responded with DOC # 0018, under 5g. Clarify whether Hickman uses emissions controls for emissions of particulate matter, volatile organic compounds, and oxides o f nitrogen, carbon monoxide, and ammonia from the manure. ***(DOC # 216 & DOC # 215)***

5. This question pertains to Request 6. We asked Hickman to provide total monthly production of compost / fertilizer for each month from January 2011 through May 2016 for each Facility. Hickman responded with DOC # 19. However, DOC #19 does not identify this information for each of the Facilities. Also, explain the formula used referencing the "Max Number of birds". Is the "Amount of Birds" based on the "Max Number" of birds the maximum capacity which the facility can hold, or is it the maximum number of birds which Hickman has actually housed? ***(DOC # 210- per our phone conversation, I have broken the calculations out per site and it reflects the actual number of birds housed)***

6. This question pertains to Request 8. We asked for results of all source testing conducted at the Facilities for emission of particulate matter, volatile organic compounds, oxides of nitrogen, carbon monoxide, and ammonia. Hickman provided DOC # 30, which includes only Hickman's Hydrogen Sulfide SOP, Hickman's Light Density & Ammonia Level Verification Policy, and light and ammonia readings from the barns dated February 15, 2016. The response seems insufficient in responding to the request.

a. Specify whether Hickman has any additional measurements from source testing from January 2011 through May 2016.

b. In addition, based on your responses, EPA understands that ADEQ has required monthly monitoring measurements from the rotary dryer covered under the recent Arizona Agricultural Best Management Practices (Ag BMP) permit provided to Hickman. Provide all copies of those measurements. FOR 6.a and 6.b - ***(DOC # 218 & DOC # 219 and DOC # 221)***

7. This question pertains to Request 12. We asked whether Hickman believes that the Facilities are subject to the Ag BMP requirements, and to explain the legal and factual basis for this position. Hickman provided DOC # 21. EPA understands that there was an inspection conducted by ADEQ on June 13, 2016, and tha t the Ag BMP procedures were reviewed with Hickman staff, and an Ag BMP permit was provided to Hickman on the same day. Provide a map situating the Hickman facilities in relation to the areas where the Ag BMP requirements apply under the Arizona SIP. In a narrative, explain the legal and factual basis for Hickman's coverage under the Ag BMP requirements. ***(DOC # 209).***

The memory stick with supporting documents will be mailed out first thing Monday morning, 10/10/2016. If you have any additional questions please contact Robert Phalen or myself anytime.

Sincerely,

Shari Yeatts
Compliance Manager / HACCP Coordinator
Hickman's Family Farms
32425 W. Salome Hwy Arlington, Arizona 85322
623-872-2358- office - 623-692-8451- cell