To: Shari Yeatts[syeatts@hickmanseggs.com]
Cc: Robert Phalen[rphalen@hickmanseggs.com]
From: Chan, Janice
Sent: Thur 5/5/2016 7:21:19 PM
Subject: RE: Hickman's Egg Ranch Request

Dear Shari,

This message supplies as a respond to your previous email dated April 29, 2016.

Included are the following requests and answers:

- Request for chemical name and their SDS, where applicable.

- SDS list of chemicals used in Hard Cooked Plant process

- SDS list of chemicals used in Liquid Egg Process

- Glycol used in Glycol Unit Conveyor at the Hard Cooked Plant. Is that ethylene glycol? Please provide a SDS.

- What chemical/product is used at the Cold Storage for Eggs for them to reach proper pH in the Hard Cooked Plant flow chart?

- What is the difference in the chemicals/products, if any, used between the "washer" and the "sanitizer" in shell egg production? When is the ZEP used – in both steps? Please provide the SDS where applicable (if it isn't the SEP SDS you already provided)

- Are any chemicals/products used to clean the machines used during the shell egg, liquid egg, or hard cooked plant processes? If so, what are the chemicals/products, and where are they used? Please provide a SDS.

- What is the chemical name/product of the citric acid/stabilizer that is added to raw whole eggs in the liquid egg process? When is it used if it isn't always used? Please provide a SDS.

- What are the chemical names/products of the action fact and anise added to the chicken manure in the windrow? Please provide a SDS.

- Regarding the Manure Barns, can you describe how the manure is dried by the exhaust air from the layer barns? Is the manure turned in the manure barn?

- Response to Mr. Jim Mano regarding the value added calculations, below.

Mr. Jim Manos

Chief Financial Officer

Hickman's Family Farms

6515 S. Jackrabbit Trail

Buckeye, AZ 85326

Dear Mr. Manos,

Thank you for providing a letter regarding the calculations for value added for products in order for the U.S. Environmental Protection Agency (EPA) to determine whether Hickman's Family Farms' (Hickman's) facilities in Arlington and Tonopah are may be subject to coverage under EPCRA 313. I would like to clarify what I have asked for regarding the calculations for value added to for products shipped, or services provided from each establishment within the facility.

As I understand, there are three general types of distinct products that are ultimately sold from the Hickman facilities. To my understanding, the products are as follows: (1) fresh whole eggs distributed to grocery stores for sale and consumption; (2) processed egg products via liquid eggs and cooked eggs; and (3) fertilizer. These three categories may be considered different types of establishments within each Hickman facility. For some of these categories, a monetary amount from an added ingredient, by-product, or product may increase the value of the product throughout its production cycle.

An example of the production cycle is with the processed egg products via liquid eggs and cooked eggs. As I understand, Hickman uses eggs produced from its own layer hens at the Arlington and Tonopah facilities for liquid or cooked egg processing. These eggs include those that may be left out of the whole egg distribution for whatever reason Hickman has. Added to these eggs are the ones which Hickman purchases from different licensees around the nation, such as from Hickman's facility in Colorado and other Hickman licensees. Hickman then processes the liquid or cooked eggs for sale or distribution to another company or vendor. If any additional value was put into the processing prior to sale or distribution, that is a value added. Once the products are sold and distributed, there is a certain cumulative price for each product. This total amount should take into account the value added, and possibly more.

Another example would possibly be through the pasteurization process within your egg processing lines.

Other examples would be through services added to the processing lines. This includes, but is not limited to, heat treatment, sanitizing (including chemicals used), additives, packaging materials, delivery trucks where applicable, etc. All these practical services add a benefit to the final product.

I understand that while products are shipped for sale or distribution for each of these three categories, Hickman would be keeping an account of what is sold and how much income is generated from these products. If you have purchase records and sales records of all the ingredients, as well as a monetary value to the whole eggs, the liquid or cooked eggs, and the compost, then they can be used to generate a calculation for the values added for each product.

Sincerely,

Janice

Janice Chan

Environmental Protection Specialist

U.S. Environmental Protection Agency, Region 9

Enforcement Division

Air & TRI Section (ENF-2-1)

75 Hawthorne Street

San Francisco, CA 94105

415-972-3308

Chan.Janice@epa.gov

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From: Shari Yeatts [mailto:syeatts@hickmanseggs.com]
Sent: Friday, April 29, 2016 3:51 PM
To: Chan, Janice <Chan.Janice@epa.gov>
Cc: Robert Phalen <rphalen@hickmanseggs.com>
Subject: RE: Hickman's Egg Ranch Request

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