To: Blumenfeld, Jared[BLUMENFELD.JARED@EPA.GOV]
Cc: McKaughan, Colleen[McKaughan.Colleen@epa.gov]
From: Don't Waste Arizona
Sent: Thur 7/9/2015 6:08:19 PM
Subject: Hickman's Egg Ranch in Tonopah and problems with the Maricopa County Air Quality Department (MCAQD)

Dear Administrator Blumenfeld:

I believe this video documents an attempt by MCAQD staff to defraud the public. It is on-line now at https://www.youtube.com/watch?v=jwZ5mu609GE&feature=youtu.be

At about thirty minutes into this, the county air agency staff do a slide show presentation and at that point, allude to an Arizona Revised Statute that prohibit the agency from enforcing the odor issues from Hickman's.

I have searched the ARS for the phrase, Normal Farm Cultural Practices, which was what was presented in the slide show, and I only found ARS 49-504, which deals with dust, not odors.

I did find that phrase within MCAQD Rule 310, but again, that applies to dust from tillage, not odors. In fact, in that rule, Section 211, the language clearly does not mention operations like Hickman's. It states,
"NORMAL FARM CULTURAL PRACTICE – All activities by the owner, lessee, agent, independent contractor, and/or supplier conducted on any facility for the production of crops and/or nursery plants. Disturbances of the field surface caused by turning under stalks, tilling, leveling, planting, fertilizing, or harvesting are included in this definition."

The odor issues are federally enforceable, and since the MCAQD will do what they do in this video instead of protecting the public, I am asking EPA to step in and protect the public. I fear a health disaster is about to occur in the area around Tonopah.

Also, I will be soon mailing you a stick with a number of pictures taken over Hickman's by a professional photographer in a helicopter, and there are many issues I believe are identified. It appears that Hickman's is dumping a manure slurry into ditches by the road adjacent to the facility in Tonopah, and then there is the issue of the "blood pond," which appears to be just a pipe that drains chicken blood into an open air pond at the facility. These issues were pointed out to me by local Tonopah residents.

After I review the pictures on the stick, I will send a detailed analysis of what I have seen, as other issues will be identified.

Thank you for your time and attention to this very serious matter.