Via email

November 6, 2015

Jared Blumenfeld, Administrator
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RE: Additional air pollution concerns regarding Hickman's Egg Ranch, Inc. of Arlington, Arizona

Dear Administrator Blumenfeld:

This is a follow up to a letter submitted to USEPA Region 9, dated October 6, 2015, on behalf of the undersigned organizations regarding the Hickman's egg-laying operation in Arlington, Arizona. We have additional immediate concerns that we are requesting USEPA to address.

Many of our STOPP, Inc. - Save Tonopah Oppose Poultry Plant – and Don't Waste Arizona members attended and made comments at the Hickman's Arlington facility's minor air permit modification hearing conducted by the Maricopa County Air Quality Department (MCAQD) at Arlington Elementary School, 9410 S. 355th Avenue, Arlington, AZ on October 21, 2015. When we were leaving the school after the hearing, at about 7:30PM, the strong odor of ammonia was pervasive and almost overwhelming. (The school is less than three miles from the Hickman's Arlington facility, which is located at 32425 Salome Highway Arlington, Arizona.)

We recognize that the Hickman's Arlington facility's ammonia emissions and particulate matter that the ammonia bonds to are carried upwards during the day settle back towards ground level after nightfall. But the ammonia is being released at the Hickman's Arlington facility 24 hours a day, seven days a week. The ammonia will and does infiltrate into the school buildings, where it can become a chronic health risk, and perhaps a threat of imminent and substantial endangerment. Certainly, when children go outside of the school, and perhaps in and outside of their own homes, they are also being exposed to dangerous levels of ammonia.

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The ATSDR (Agency for Toxics Substances and Disease Registry) has relevant data on its website about ammonia and ammonia's health hazards, and information about how children are at a disproportionate risk. A close review of the data shows that if a person can smell ammonia, which has an odor threshold of 5 ppm, then that person is at risk. An MRL (Minimal Risk Level) of 1.7 ppm has been derived for acute-duration inhalation exposure (14 days or less) to ammonia. **An MRL of 0.1 ppm has been derived for chronic-duration inhalation exposure (365 days or more) to ammonia.** The ammonia odor at Arlington School that evening was very high and very irritating to human respiratory systems. ATSDR also insists that children are disproportionately affected by chemical exposures. In emergency response situations involving ammonia, 300ppm is the IDLH (Immediate Danger to Life and Health) standard, so air monitoring should be conducted especially at night to ensure this is not exceeded. With seasonal temperature inversions that trap air pollution near the ground, there could also be a dangerous condition.

The affected children attending Arlington Elementary never get away from the ammonia, and we request EPA investigation and intervention before there is a public health catastrophe. There needs to be air monitoring at and around the Arlington School, and appropriate action taken.

If Hickman's had complied with its requirements for reporting ammonia releases through EPCRA Sections 304 and 313 as we alleged, there would be publicly available data that could be used to model the area of impacts and the rate of infiltration into the Arlington Elementary School. Normally, if a facility commits an EPCRA Section 304/CERCLA 103 violation, part of the penalty determination is the adverse impact on public health, and remediation is required if public health is at risk.

We appreciate your time and consideration in this matter.

Sincerely,

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cc: AZ Governor Doug Ducey
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Phillip McNeely, Director, Maricopa County Air Quality Department
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- Steve Chucri, District 2 Supervisor and Chairman
- Andy Kunasek, District 3 Supervisor
- Clint L. Hickman, District 4 Supervisor
- Steve Gallardo, District 5 Supervisor

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