July 10, 2015

EPA Region 9 Administrator Jared Blumenfeld
USEPA Region 9
75 Hawthorne Street
San Francisco, CA 94105

Re: Concerns about the Hickman's Egg Ranch Concentrated Animal Feed Operations in Maricopa County, Arizona

Dear Administrator Blumenfeld:

Don't Waste Arizona (DWAZ) has received many complaints about the Hickman's Tonopah and Arlington facilities.

Enclosed is a CD with pictures taken very recently by a professional camera person from a helicopter while traveling over the Hickman's facility in Tonopah, Arizona and Arlington, Arizona.

In photo Y5A4123, regarding Hickman's Tonopah facility, the large equipment is shown spraying something that appears to be waste on the ground. But the Nutrient Management Plan for this facility claims there should be NO land application at the facility. DWAZ is very concerned about the potential for groundwater contamination at both the Tonopah and Arlington facilities. This evidently is the nation's largest egg factory operation.

In photo Y5A4197, it appears a truck is loading from the storm water detention basin, dust control basin, and sediment basin. This basin is not included in the Nutrient Management Plan, and appears to be being used for multiple purposes (storm water, dust control and sediments) which would appear to be a violation of the Nutrient Management Plan.

In photo Y5A4194, the impoundment appears to be unlined. Since various hazardous materials are being used at the facility, there is a concern that these are being emitted into the ambient air from these evaporation ponds, as well as what might seep into the groundwater.

I have also included three CDs of photos taken above the Arlington Hickman's facility. Since the manure from the Tonopah facility is being trucked to the Arlington facility, it seems that 40 CFR 122.23(b)(2) would require these two CAFOs be actually registered as one and adhere to the same regulations and waste management plans. This also raises questions about requirements for the facility under the Clean Air Act.

There are many other issues about these facilities and their permits as issued by the Maricopa County Air Quality Department, and I will prepare a separate communication regarding those matters.

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I request that EPA further investigate these facilities, or the facility as it appears to be just one per 40 CFR 122.23(b)(2).

Thank you for your time and attention to this matter.

Sincerely,

Stephen M. Brittle
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