**To:** Salazar, Matt[Salazar.Matt@epa.gov]
**From:** Michael R. Orman
**Sent:** Wed 11/11/2015 4:11:48 PM
**Subject:** FW: ADEQ Response - KJZZ Media Inquiry - RE: Hickman's Egg Farm Tonopah, Maricopa County
Hickman Tonopah 2015 Complaints Up to 10-22-2015.xlsx
Hickman's Tonopah Ag Insp docs 8.10.2015.pdf
Tonopah Map Complaints.png
Hickman Tonopah Ag Insp docs 2-11-15.pdf
Hickman's Checklist 2.2015.pdf
Hickman's Poultry Checklist 8.10.2015.pdf

Hello Matt,

As requested, please see the e-mail below and the attached inspection reports. I've also attached a query of our records that I performed to help respond to the NPR's media request (The resulting article can be found here: http://kjzz.org/content/214892/arizona-residents-spar-hickmans-egg-farms-over-smell-health-concerns). As noted below, ADEQ covers complaint response of dust under the Ag BMP rules. Maricopa County covers complaint response of odor under their stationary source air quality permit. I actually had my first meeting with Maricopa County yesterday and brought up your request for a contact to discuss Hickman's. The best person to reach:

Kim Butler

Compliance and Enforcement Division Manager

kimberlybutler@mail.maricopa.gov

602-506-7939

Kim's super busy. As a secondary contact, try:

Bryan Mandalfino

Air Quality Compliance Supervisor

bryanmandalfino@mail.maricopa.gov

602-506-6714

I mentioned the complaint from STOPP to Maricopa. When you contact Kim or Bryan, I'm sure they would like to have a copy of the complaint as well.

I hope this information helps. I'll be in and out of the office for the rest of this week, but I'll be checking my e-mails. If you need more information, or some specific complaints, let me know! I'll do my best to call Thursday or Friday to check-in.

Sincerely,

Michael R. Orman, E.I.T.

Air Quality Compliance Section Manager

Arizona Department of Environmental Quality

1110 W. Washington Street

Phoenix, AZ 85007

602-771-4406

**From:** Caroline Oppleman
**Sent:** Friday, October 23, 2015 3:13 PM
**To:** Casey Kuhn
**Subject:** ADEQ Response - KJZZ Media Inquiry - RE: Hickman's Egg Farm Tonopah, Maricopa County

Hi Casey,

According to our records, the Arizona Department of Environmental Quality (ADEQ) has received a total of 64 complaints regarding Hickman's Family Farms in Tonopah since January 1, 2015. These complaints were related to odor (for which Maricopa County Air Quality Department has jurisdiction regarding the farms' air quality permit) and agricultural dust (for which ADEQ has jurisdiction regarding agricultural best management practices or AgBMPs).

By way of background, please see the following for more information about AgBMPs from ADEQ's website: Current Activities – The Arizona Agricultural Best Management Practices Committee was established in 1998 by Arizona Revised Statutes (A.R.S) § 49-457 to research and adopt best management practices (BMPs) for agricultural operations that generate dust. The BMPs are designed to reduce emissions of particulate matter of 10 microns or smaller ($PM_{10}$) in the Maricopa County Serious $PM_{10}$ nonattainment area. Periodically the Committee reexamines the BMPs to review effectiveness, modifies them if necessary, or adopts new measures. Beginning in 2006, the Committee reconvened the Technical Workgroup to review the current use of BMPs in Maricopa County. The Workgroup also reviewed other state agricultural programs and additional agricultural practices to make recommendations for changes to the current BMP program. In the fall of 2007, the Committee adopted five additional BMPs and revised the number of BMPs required per agricultural category from one to two BMPs required per category. The Arizona Legislature revised A.R.S. § 49-457 in Section 14 of Senate Bill 1552, first regular session 2007. The Statute was revised to require two BMPs to be implemented per agricultural management category beginning December 31, 2007, and revised the definition of the regulated area for BMPs as the Maricopa County portion of Area A. To reduce $PM_{10}$ emissions for the contribution from agriculture, the Committee adopted five new BMPs, required two BMP per agricultural category, and extended the area for BMPs to Maricopa County portions of Area A. R18-2-610 and 611 were revised to account for these changes and a revision of the 2001 SIP was completed. The SIP revision, Maricopa County $PM_{10}$ Serious Nonattainment Area - Agricultural Best Management Practices, is being prepared for submission to U.S. EPA. For detailed BMP information, a public education document entitled Guide to Agricultural $PM_{10}$ Best Management Practices, Maricopa County, Arizona $PM_{10}$ Nonattainment Area is available. This document includes an overview of the agricultural $PM_{10}$ best management practices program, descriptions of the best management practices, suggestions for implementation and a sample record form sample agricultural BMP general permit record that commercial farmers can use to document compliance.

Of the 64 complaints ADEQ received, 51 were odor-related and therefore, referred to Maricopa County to address. The 13 remaining complaints ADEQ received were related to agricultural dust and for two of these, ADEQ dispatched an ADEQ inspector to conduct an on-site facility inspection to evaluate compliance with Ag BMPs. Both ADEQ inspections found no deficiencies.

For further information, ADEQ's standard process for complaint response involves expeditiously addressing all complaints by phone or e-mail with an average response time of 5-days or less following complaint receipt. Our initial response sometimes includes notifying the facility that we received a complaint and that we will be looking to take appropriate action and other times

ADEQ dispatches an inspector to ascertain compliance at the facility. Also, for situations when ADEQ recently has completed a similar facility inspection, ADEQ will ask the facility to take appropriate corrective action and close the complaint.

If you need further details or supporting documents, please let me know. Thank you and have a great weekend.

Caroline

*Caroline Oppleman*

*Public Information Officer*

*Arizona Department of Environmental Quality*

*1110 W. Washington St.*

*Phoenix, AZ 85007*

*Office: (602) 771-2215*

*Mobile: (434) 386-7212*

*co2@azdeq.gov*

**From:** Casey Kuhn [mailto:ckuhn@rioradio.org]
**Sent:** Thursday, October 22, 2015 12:15 PM
**To:** Caroline Oppleman
**Subject:** Hickman's egg complaints

Hey Caroline,

Just checking in, still haven't heard back from Bob at Maricopa County AQ (yet) so thought I'd give you one more shot.

Could you tell me how many complaints the ADEQ has had that deal specifically with Hickman's egg farms in Tonopah and Arlington?

A number would be fine, but any other detail would be really helpful as well. If there's someone else you could refer me to at the ADEQ who would know, I'd appreciate that contact as well.

Thanks!

Casey

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Casey Kuhn
*Senior Field Correspondent, KJZZ*

Office: 480-774-8357

Cell: 513-508-0663

Twitter: @CaseyAtTheDesk

**From:** Casey Kuhn [mailto:ckuhn@rioradio.org]
**Sent:** Wednesday, October 21, 2015 10:51 AM
**To:** Caroline Oppleman
**Subject:** Hickmans egg farm air quality question

Hello Caroline,

I'm a reporter for KJZZ, the NPR affiliate here in Phoenix and I'm working on a story about a

large egg farm in Tonopah affecting the residents there. I believe there have been a few complaints to the ADEQ about this and was wondering if there is any base to the complaints.

Do you know who I should talk to about that?

Thanks!

Casey

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Casey Kuhn
*Senior Field Correspondent, KJZZ*

Office: 480-774-8357

Cell: 513-508-0663

Twitter: @CaseyAtTheDesk

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