To: Timothy Franquist Jr.[FranquistJr.Timothy@azdeq.gov]
From: Salazar, Matt
Sent: Thur 12/11/2014 5:06:02 PM
Subject: FW: Hickman's Egg Factory in Tonopah, Arizona; Request for Investigation and Enforcement as Needed

Hi Tim,

Hope your holidays are going great so far. We're still plugging away at the confidentiality agreement and making some finishing changes on our SRF draft and we'll hopefully share both soon.

We got this from Don't waste Arizona. Have you looked into this facility?

Thanks,

Matt

Subject: Hickman's Egg Factory in Tonopah, Arizona; Request for Investigation and Enforcement as Needed

November 18, 2014

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

Re: Hickman's Egg Factory in Tonopah, Arizona; Request for Investigation and Enforcement as Needed

Don't Waste Arizona is very concerned about the Hickman's egg factory being constructed and operated in Tonopah, Arizona. The facility is taking extraordinary measures to avoid any sort of regulatory scrutiny, and doesn't even have any building permits for any of its construction, much less any other environmental permits. It has deliberately worked to create a dearth of information about its on-site activities, but local residents have documented some of what appears to be going on at the facility, which has commenced construction and is a phased-in operation. It already is operating while continuing its construction.

There already is a Hickman's egg factory in Arlington, Arizona, which has some of the requisite environmental permits in place or in process, but this Tonopah facility will eventually hold many millions more chickens than the Arlington facility, and yet appears to have none.

It appears that the Hickman's Tonopah facility will need to have a number of environmental

permits as there are or will be a number of industrial operations at this facility, so it appears that it will need many, including at a minimum:

- dust control permits;
- permits for milling and grinding feed;
- permits for the grinding and processing of millions of chickens (disposal);
- permits regarding the control of particulates, which include ammonia and other chemicals emanating from its enormous barns;
- permits for the milling, grinding and processing of manure and chicken carcasses into pellets for sale.

There is also no evidence of any specific permit, permit application/request, Notice of Intent (NOI), or any other type of notice/document regarding the facility's compliance with the state/federal AZPDES program; a Nutrient Management Plan to protect groundwater from nitrate and nitrite pollution; and/or any Notice of Intent (NOI) filed by Hickman to fall under the AZPDES General permit for CAFO's;

The Arlington facility generates a stench that stings the nose and eyes for quite a distance from its fence line, and it seems that the Tonopah facility will generate a stench with a wider range, which appears to also violate the AZ SIP regarding odors.

Don't Waste Arizona requests EPA Region 9 commence an investigation into the facility's compliance with all environmental permitting requirements within EPA's jurisdiction, and to take whatever enforcement actions are warranted by the result of this investigation.

If Don't Waste Arizona can assist in any way with more information, please do not hesitate to contact me.