To: Cabrera.misael@azdeq.gov[Cabrera.misael@azdeq.gov]; Randall G. Matas[Matas.Randall@azdeq.gov]
Cc: Strauss, Alexis[Strauss.Alexis@epa.gov]
From: Don't Waste Arizona
Sent: Fri 2/3/2017 12:16:08 AM
Subject: ammonia releases at Hickman's facilities require emergency response, per ADEQ's own calculations
Hickmans Summary of NH3 and H2S preliminary Modeling for Hickman.doc

Dear Mr. Cabrera and Mr. Matas:

Attached is the file I received today from ADEQ regarding its modeling of ammonia emissions (releases) from the Hickman's Arlington and Tonopah facilities. Even though I believe the emissions rates/bird are understated, and that ADEQ failed to use the proper software for modeling chemical releases (ALOHA), and also set the release height too low, among other issues, I used the data supplied to get the following result:

I did a simple grams to pounds conversion and found that even ADEQ's computation show exceedances of the 100 lb reportable quantity for ammonia every day. (EPCRA requires that the SERC and LEPC of jurisdiction must be notified immediately when a facility emits > 100 pounds/day of ammonia.)

In fact, according to ADEQ's own estimations:

Tonopah would be emitting 1,909.873 lbs/day of ammonia.

Arlington would emit 2311.646 lbs/day + 1341.585 lbs/day for a total of 3,653.231 lbs/day of ammonia.

So when is there going to be an emergency response?

I look forward to your response.

Stephen M. Brittle

DWAZ