To: Strauss, Alexis[Strauss.Alexis@epa.gov]
From: Don't Waste Arizona
Sent: Thur 4/20/2017 1:14:48 PM
Subject: Re: Petition for Environmental Sampling and Public Health Assessment
removed.txt

I would characterize that would consist of sharing with ATSDR whatever responses you have received from Hickman's to your letter to Hickman's about their ammonia emissions/releases, and any other relevant data and complaints. When I attended the Hayden ATSDR meeting of April 18, 2017, ATSDR spoke about how EPA asked ATSDR to get involved in Hayden by investigating the effects of the lead and arsenic emissions from ASARCO. Perhaps EPA can also suggest to ATSDR that the ammonia monitoring be implemented.

Thanks,

Steve Brittle
DWAZ

From: Strauss, Alexis
Sent: Wednesday, April 19, 2017 3:31 PM
To: dwaz@fastq.com
Subject: RE: Petition for Environmental Sampling and Public Health Assessment

Steve,

Thanks for the update. What would that "support" be, from your vantage point? You may know we house a few ATSDR staff here in the Regional Office.
Kind regards,

Alexis

Alexis Strauss

Acting Regional Administrator

E.P.A. Region 9

75 Hawthorne Street

San Francisco, CA 94105

415-972-3572

From: Don't Waste Arizona [mailto:dwaz@fastq.com]
Sent: Wednesday, April 19, 2017 12:31 PM
To: Strauss, Alexis <Strauss.Alexis@epa.gov>
Subject: Fw: Petition for Environmental Sampling and Public Health Assessment

It would be great if EPA could support our petition.

Thanks,

Steve Brittle

From: Rodenbeck, Sven (ATSDR/DCHI/OD)

Sent: Wednesday, April 19, 2017 6:03 AM

To: Steve Brittle

Cc: Gerhardstein, Benjamin (ATSDR/DCHI/WB) ; Vianu, Libby (ATSDR/DCHI/WB) ; Don't Waste Arizona

Subject: RE: Petition for Environmental Sampling and Public Health Assessment

Mr. Brittle,

Thank you for sending me the email below and the one sent on April 17th. I will be sending you and Mr. Mack a letter officially confirming receipt of your petition. In the meantime, I would like to provide you with the following information concerning the petition process.

We will contact various federal, state, and local agencies to obtain any available environmental and health information related to your petition. After we have received the information, ATSDR will determine whether we can provide a meaningful response to your petition based upon our review of the available environmental and health information.

It typically takes about 6-months for ATSDR to complete the initial evaluation of petition requests. At which time we will send you a letter that explains ATSDR's decision.

If our initial evaluation indicates that we can provide a meaningful response to a petition request, ATSDR may conduct (this is not an all-inclusive list but covers most activities we do):

•□□□□□□□□ A public health assessment or health consultation that would investigate and evaluate whether people are eating, drinking, or having physical contact with hazardous substances at levels of health concern. The ATSDR video at the following internet link provides addition information about our public health assessment process: http://www.atsdr.cdc.gov/videos/health_assessment_process.htm

•□□□□□□□□ Provide community and professional health education to increase the awareness of what public health concerns may be associated with hazardous substances in the community.

•□□□□□□□□ Refer a petitioner's request to a more appropriate governmental agency.

•□□□□□□□□ In some cases we provide the petitioner with a detailed explanation as to why ATSDR cannot provide a meaningful response to the petitioners request.

Please note, ATSDR typically does not conduct a health study (i.e., epidemiological investigation) until after a public health assessment or health consultation is conducted and identifies/recommends that a health study be considered. As a non-regulatory public health agency, ATSDR does not evaluate regulatory decisions made by other agencies or environmental impacts. In addition, ATSDR's evaluations generally are not able to determine the cause of a particular disease or medical condition experienced by an individual or a group of individuals in a community.

Please let Ben Gerhardstein, cc'ed on this e-mail, or me know if you have any addition questions or would like to discuss your petition in more detail.

Sven

Sven E. Rodenbeck, Sc.D., P.E., BCEE

Rear Admiral (retired), USPHS

Petition Coordinator

ATSDR/DCHI - Mailstop F59

1600 Clifton Road, NE

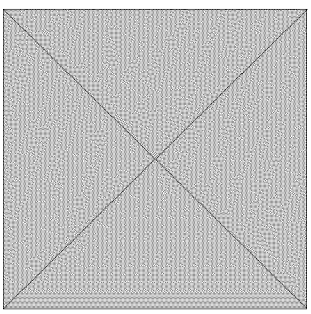
Atlanta, GA 30329-4027

Office Telephone: (770) 488-3660

FAX: (770) 488-1543

Machinatores Vitae

(Engineering for Life)



From: Steve Brittle [mailto:smbrittle@yahoo.com]
Sent: Wednesday, April 19, 2017 1:36 AM
To: Rodenbeck, Sven (ATSDR/DCHI/OD) <svr1@cdc.gov>
Cc: Gerhardstein, Benjamin (ATSDR/DCHI/WB) <fty9@cdc.gov>
Subject: Petition for Environmental Sampling and Public Health Assessment

Via Email to svr1@cdc.gov and bgerhardstein@cdc.gov and US Mail

April 17, 2017

Sven Rodenbeck, Ph. D.

Environmental Engineer

Petitions Coordinator

Agency for Toxic Substances and Disease Registry

4770 Buford Hwy, NE

Atlanta, GA 30341

Re: Petition for Environmental Sampling and Public Health Assessment

Don't Waste Arizona (DWAZ) is a state-wide non-profit environmental organization dedicated to the protection and preservation of the environment in Arizona. DWAZ is a 501 c 3 charitable organization with members in Tonopah and Arlington, Arizona. DWAZ is especially concerned and involved with emergency response to chemical incidents.

STOPP is a non-profit organization formed to protect and educate the public about the pollution from the Hickman's Family Farms facility in Tonopah and Arlington, Arizona. STOPP has members that live, work, and attend school in close proximity to both Hickman's locations.

DWAZ and STOPP recently became aware that there are large amounts of ammonia being released by the Hickman's Egg Ranch facilities in Arlington and Tonopah, Arizona. In October 2015, after an air permit hearing at the Arlington Elementary School, located at 9410 S 355th Ave, Arlington, AZ 85322, about three miles west of the Hickman's Family Farms' Arlington facility, a strong, almost overcoming odor of ammonia was detected. There is also a residential community very near the school where many students live that is even closer to the Hickman's Arlington facility.

In October 2016, the Arizona Department of Environmental Quality (ADEQ) modeled the dispersion of ammonia from the Hickman's facilities, and released the modeling to the public in March 2017. But there are questions about whether the ammonia releases were modeled using the correct amounts of ammonia being released from the Hickman's Arlington and Tonopah facilities. The modeling does show that areas around Arlington and the Arlington Elementary School are above the screening level for ammonia exposure. An MRL of 0.1 ppm has been derived for chronic-duration

inhalation exposure (365 days or more) to ammonia by ATSDR, and an MRL of 1.7 ppm has been derived for acute-duration inhalation exposure (14 days or less) to ammonia. It also showed that areas in and around Tonopah Arizona show levels that are above the screening level for ammonia. These numbers cited in the modeling give STOPP and the Tonopah community reason for concern because there are people who work and live adjacent to the Hickman's Tonopah facility, up to 500 within a one-mile radius, and that ammonia levels are above the screening for chronic ammonia exposure in that locale also.

There are three different reports regarding the amounts of ammonia being released at these Hickman's facilities. Hickman's Egg Ranch has just recently filed a continuing release notification for ammonia with the USEPA that has a different amount than ADEQ's. Also, an expert for an EPCRA enforcement action commenced by DWAZ has calculated different and very much higher amounts of these daily ammonia releases.

Meanwhile, there are health concerns from residents, students, parents, workers, and other members of the public. People are reporting symptoms that correlate with chronic ammonia exposure. There are times when the odor of ammonia is often detectable, and even quite strong.

We petition ATSDR to determine what the actual local exposures are to the ammonia being released by conducting environmental sampling and to provide a public health assessment based on the results of the air sampling. A copy of the ADEQ ammonia dispersion modeling is attached, as well as the continuous release reports provided by the Hickman's Egg Ranch facilities in Arlington, Arizona, and the report from the expert for the DWAZ EPCRA enforcement action.

Thank you for your consideration in the matter.

Sincerely,

Stephen M. Brittle

President

Don't Waste Arizona

2934 West Northview Avenue

Phoenix, AZ 85051

Dan Mack

Chairman

STOPP

PO Box 1075

Tonopah, Arizona 85354

cc: Ben Gerhardstein, MPH

ATSDR, Region 9

ATTACHMENTS