



NEW MEXICO
ENVIRONMENT DEPARTMENT



Surface Water Quality Bureau

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January 17, 2014

Mr. Dan Mourning, General Manager
EXPO New Mexico
P.O. Box 8546
Albuquerque, NM 87198

**Re: EXPO New Mexico, CAFO; SIC 5093; NPDES Compliance Evaluation Inspection; NMG010068;
December 17, 2013**

Dear Mr. Mourning:

Enclosed please find a copy of the report and check list for the referenced inspection that the New Mexico Environment Department (NMED) conducted at your facility on behalf of the U.S. Environmental Protection Agency (USEPA). This inspection report will be sent to the USEPA in Dallas for their review. These inspections are used by USEPA to determine compliance with the National Pollutant Discharge Elimination System (NPDES) permitting program in accordance with requirements of the federal Clean Water Act.

Introduction, treatment scheme, and problems noted during this inspection are discussed in the "Further Explanations" section of the inspection report. Based on this inspection, we found that there were significant improvements made to the stormwater and wastewater treatment systems at EXPO. No ongoing problems were noted and no corrections are therefore recommended in this report.

You are encouraged to review the inspection report. If you have comments on or concerns with the basis for the findings in the NMED inspection report, please contact us (see the address below) in writing within 30 days from the date of this letter. Further, you are encouraged to notify in writing both the USEPA and NMED regarding modifications and compliance schedules at the addresses below:

Racquel Douglas
US Environmental Protection Agency, Region VI
Enforcement Branch (6EN-WM)
1445 Ross Avenue
Dallas, Texas 75202-2733

Bruce Yurdin
NMED Surface Water Quality Bureau
Point Source Regulation Section
P.O. Box 5469
Santa Fe, New Mexico 87502

If you have any questions about this inspection report, please contact Sarah Holcomb at 505-827-2798 or at sarah.holcomb@state.nm.us.

Sincerely,
/s/ Bruce J. Yurdin
Bruce J. Yurdin
Program Manager
Point Source Regulation Section
Surface Water Quality Bureau

cc: Rashida Bowlin, USEPA (6EN-AS) by e-mail
Carol Peters-Wagnon, USEPA (6EN-WM) by e-mail
Racquel Douglas, USEPA (6EN-WM) by e-mail
Gladys Gooden-Jackson, USEPA (6EN-WC) by e-mail
Abu Senkayi, USEPA (6EN-P) by e-mail
NMED District 1, William Chavez by e-mail



NPDES Compliance Inspection Report

Section A: National Data System Coding

Transaction Code	NPDES	yr/mo/day	Inspec. Type	Inspector	Fac Type
1 N 2 5 3 N M G 0 1 0 0 6 8 11 12 1 3 1 2 1 7 17 18 = 19 S 20 2					
Remarks					
L A R G E C A F O - R A C E T R A C K					
Inspection Work Days	Facility Evaluation Rating	BI	QA	Reserved	
67 [] [] [] 69	70 4	71 N	72 N	73 [] [] []	74 75 [] [] [] [] [] [] [] [] [] [] 80

Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number) EXPO NEW MEXICO, BERNALILLO COUNTY; FROM I-40, TAKE THE SAN MATEO EXIT. TURN RIGHT ON SAN MATEO, THEN LEFT ON LOMAS. TURN RIGHT ON SAN PEDRO, AND ENTER THE FAIRGROUNDS AT GATE 3.	Entry Time /Date 0900 / 12-17-2013	Permit Effective Date 9-3-2009
	Exit Time/Date 1130 / 12-17-2013	Permit Expiration Date 9-2-2014
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) MR. DAN MOURNING, GENERAL MANAGER, EXPO NM (505) 222-9700 MR. JOHN JARAMILLO, DIR.SPECIAL PROJECTS, EXPO NM (505) 222-9700 MR. RAYMOND HENSLEY, THE Group (505) 999-1900 MS. ALLISON HEDGE COCK, CHIEF LEGAL COUNSEL, NM STATE FAIR (505) 221-8888	Other Facility Data SIC 5093 GPS: N. 35° 4' 53.98" W. -106° 34' 33.34"	
Name, Address of Responsible Official/Title/Phone and Fax Number MR. DAN MOURNING, GENERAL MANAGER, EXPO NM PO BOX 8546, ALBUQUERQUE, NM 87198	Contacted Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	

Section C: Areas Evaluated During Inspection

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

S	Permit	N	Flow Measurement	S	Operations & Maintenance	N	CSO/SSO
S	Records/Reports	S	Self-Monitoring Program	S	Sludge Handling/Disposal	N	Pollution Prevention
S	Facility Site Review	S	Compliance Schedules	N	Pretreatment	N	Multimedia
N	Effluent/Receiving Waters	N	Laboratory	S	Storm Water	N	Other:

Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

1. Please see report for further explanations.

Name(s) and Signature(s) of Inspector(s) Sarah Holcomb /s/ Sarah Holcomb	Agency/Office/Telephone/Fax 505-827-2798	Date 1-17-2014
Signature of Management QA Reviewer Bruce Yurdin /s/ Bruce Yurdin	Agency/Office/Phone and Fax Numbers 505-827-2795	Date 1-17-2014

**NPDES Compliance Inspection
EXPO New Mexico/The Downs at Albuquerque
December 17, 2013
Further Explanations**

Introduction

On December 17, 2013, a Compliance Evaluation Inspection was conducted at the EXPO New Mexico/State Fairgrounds facility (New Mexico State Fair Commission property owned by the State of New Mexico), an animal feeding operation located at Albuquerque, New Mexico by Dr. Abu Senkayi of USEPA Region 6 and Sarah Holcomb of the New Mexico Environment Department (NMED) Surface Water Quality Bureau (SWQB). The purpose of this inspection was to document the facility's status regarding the NPDES Concentrated Animal Feeding Operation (CAFO) permit program and CAFO regulations at 40 Code of Federal Regulations (CFR) Part 122 and 40 CFR Part 412.

EXPO New Mexico is responsible for operating a year-round service and events facility and is also responsible for putting on the annual state fair. EXPO NM has a tenant, the Downs at Albuquerque, which operates a race track and casino on the EXPO NM property. The Downs has leased approximately 83 of EXPO's 236 acres since 1985. The facility's Nutrient Management Plan (NMP) indicates that the animal operations are confined to 45.2 acres. The racing season is from approximately August through mid-November, which is about 100 days. Other events, including the fair, are held throughout the rest of the year. Facility representatives indicated that their maximum capacity is 1374 horses, but that fluctuates by about 20-50 head. Although some horses remain on site all year, there are far fewer during the non-racing season. One of the larger activities is the Arabian horse show that brings in 900 horses, and which lasts for approximately a week and a half. A variety of other livestock are present during the state fair.

In the prior NMED inspection conducted in November 2011, the findings were that there was little to no containment, and runoff periodically discharged via the EXPO NM small MS4 to the Albuquerque large MS4, thence to the Rio Grande in segment 20.6.4.105 NMAC of the Rio Grande basin. This inspection's primary purpose was to document the new management measures EXPO has installed to prevent the runoff of CAFO waste, as required by the permit issued to the facility in July 2013, and also required by enforcement action from USEPA.

This report is based on a review of records maintained by the facility, on-site observation by NMED and USEPA personnel, and verbal information provided by the facility representatives; Mr. Dan Mourning, General Manager for EXPO NM, Mr. John Jaramillo, Director of Special Projects for EXPO NM, Mr. Raymond Hensley of THE Group, consultant for EXPO NM, and Ms. Allison Hedgecock, Chief Legal Counsel for the New Mexico State Fair Commission.

An entrance interview was conducted and credentials were presented to the parties mentioned above at approximately 0900 hours on December 17, 2013. The purpose of the inspection and review of plans and other paperwork was discussed in the entrance interview. A tour of the facility commenced afterward, and an exit interview was conducted at approximately 1115 hours at EXPO NM, discussing the preliminary findings of the inspection.

Findings

Historically there has been a complex infrastructure situation at this facility. EXPO NM is located in the middle of the city of Albuquerque on land owned by the State of New Mexico. In 1982, an easement was granted to allow the city to install flood control/stormwater infrastructure at this site on state land. This infrastructure drains approximately 2.6 square miles of the neighborhoods that directly border EXPO NM to the East. The drainage from this area is sent to a large sectionalized storm surge pond located at the east end of EXPO NM. An outlet from this pond was constructed to connect it to the existing storm drain system constructed in the 1950s. This subsurface outlet pipe crosses the north end of EXPO NM, through the area where the animals are stabled. Since the prior inspection, EXPO has sealed off the five drop inlets into this stormwater pipe by installing corrugated steel underneath the inlets in conjunction with a strong plastic pond liner material, and then paved over the inlet with asphalt. EXPO has also installed berms to divert runoff from the MS4 area of the facility away from the CAFO area. Please see photos # 1 & 7.

After this stormwater drainage pipe passes the stabling area, the pipe previously terminated in a two-cell stormwater surge detention pond located near the northwest corner of EXPO NM. Previously, the entire northern-most cell received both the above offsite drainage from the east as well as stormwater from the racetrack, stable area and manure storage areas. Since the prior inspection, this pond has been modified with an engineered dam to separate the storm surge area (off site flow from San Pedro Blvd.) and the CAFO runoff area. Please see photos #13 through 16. The CAFO's runoff retention pond has been estimated to contain approximately 6.6 acre feet of water. The two month storage requirement is 3.9 acre feet.

There are numerous wash racks located around the stabling facilities. Discharges from the wash racks located around the stabling area are now directed through a new conveyance system (please see photos #4-6) to a pretreatment system. This pretreatment system provides primary treatment (settling) of the wastewater before discharging the waste to the Albuquerque Bernalillo County Water Utility Authority's (ABCWUA) sanitary sewer system. EXPO NM holds an NPDES pretreatment permit with the ABCWUA for discharge of this wastewater to their system. The pretreatment system consists of two chambers. The first chamber (800 gallons) provides the primary treatment/settling, after which the flow is directed to a sump. Solids collected from the settling basin are disposed of at a Bernalillo County transfer station near Tijeras, NM. The sump (800 gallons) is operated via a float valve and automatic pump. The pump has a rainwater detection device, which allows the system to shut off in the event of rainfall, enabling the ABCWUA to avoid collecting rainwater into their system. Please see photos #10-12.

The facility personnel also removed compacted dirt in the barn area and refilled the area with 12-18 inches of new soil in order to promote infiltration on site. The facility also added swales and focused on improving surface grading. Please see photo #9.

The roof runoff from the stall/barn area of the CAFO has been disconnected from the production area. Please see photo #2-3. This clean runoff has been directed, via underground pipe, into the storm surge pond side of the new engineered dam. Please see photo #14, indicator #3.

The new series of ponds, as indicated by the aerial view of the facility in Appendix A, show separation of the offsite stormwater managed by the city of Albuquerque and the CAFO wastewater managed by EXPO NM. At the time of this inspection, the pond depth markers had not yet been installed due to high levels of water contained in the ponds. Facility personnel indicated that depth measurements had still been occurring and provided this documentation to USEPA. Once the pond water evaporates, facility personnel indicated that the depth markers would be installed soon thereafter.

As found previously, there is no long term manure storage on site. The animal waste is collected daily in poly carts, placed into a plastic bin, and transported to one of approximately 32 covered muck bins. A loader is then used to empty the bins and load the waste into a dump truck. The truck hauls the waste to a Waste Management container, which is then hauled offsite to the ABCWUA composting facility. Manure analysis will be done this month in preparation for the facility's annual report.

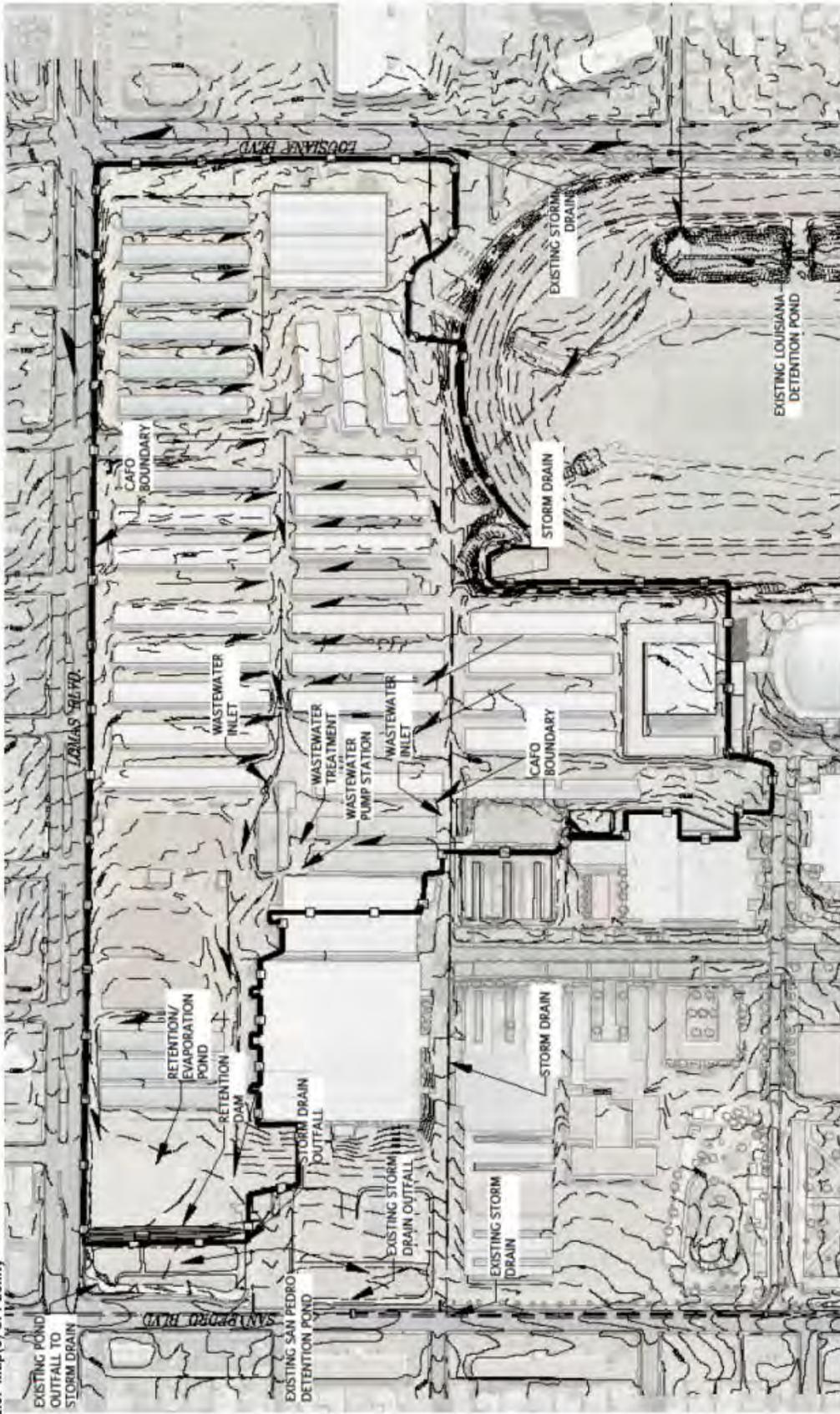
Feed and supplies are stored in a covered, enclosed building near the wastewater treatment facility. Trainers retrieve feed and supplies as needed from this area.

Facility representatives also indicated to the inspectors during this inspection that the new lease agreement with The Downs at Albuquerque mandates adherence to the requirements of the permit. EXPO staff also conduct walk through inspections on a regular basis to ensure that The Downs is in compliance with these requirements. Although not addressed specifically in the Comprehensive Nutrient Management Plan (CNMP), facility staff indicate that veterinary waste is taken offsite by the veterinarian as it is generated, and there is a procedure in place to remove accumulated sediment and/or oil and grease from the wastewater collection pond, which is dually used as a parking area during high traffic events such as the State Fair.

Inspection Evaluation

As a result of this inspection, NMED observed significant improvements to the diversion of uncontaminated stormwater over the previous inspection of these facilities. Additional improvements were also observed in the collection and handling of potentially contaminated runoff from various stabling and manure, bedding and feed storage areas. No ongoing problems, including livestock waste discharges, were observed.

2.8. Map(s) of Facility



Surface Water and Structural Control Map

NMED Photolog
Photo #1

Photographer:	Sarah Holcomb	Date:	12-17-2013
Location:	EXPO New Mexico, Albuquerque, Bernalillo County, NM		
Description:	Water diversion structure/berm installed to divert stormwater run-on away from the CAFO area of the facility.		



NMED Photolog
Photo #2

Photographer:	Sarah Holcomb	Date:	12-17-2013
Location:	EXPO New Mexico, Albuquerque, Bernalillo County, NM		
Description:	Uncontaminated roof runoff has been disconnected and is directly diverted into the City of Albuquerque's stormwater system. The downspouts are directly connected to the city storm sewer.		



NMED Photolog
Photo #3

Photographer:	Sarah Holcomb	Date:	12-17-2013
Location:	EXPO New Mexico, Albuquerque, Bernalillo County, NM		
Description:	Uncontaminated roof runoff has been disconnected and is directly diverted into the City of Albuquerque's stormwater system. The downspouts are directly connected to the city storm sewer.		



NMED Photolog
Photo #4

Photographer:	Sarah Holcomb	Date:	12-17-2013
Location:	EXPO New Mexico, Albuquerque, Bernalillo County, NM		
Description:	A new culvert/drainage system has been installed to convey the wastewater from horse washing to the treatment system. This channelizes the water and efficiently conveys it through the facility. All of the horse wash racks are connected to this conveyance.		



NMED Photolog
Photo #5

Photographer:	Sarah Holcomb	Date:	12-17-2013
Location:	EXPO New Mexico, Albuquerque, Bernalillo County, NM		
Description:	The horse wash racks are directly connected to the new conveyance.		



NMED Photolog
Photo #6

Photographer:	Sarah Holcomb	Date:	12-17-2013
Location:	EXPO New Mexico, Albuquerque, Bernalillo County, NM		
Description:	The new conveyance system leads directly to drop inlets, which carry the wastewater to the EXPO's wastewater treatment facility.		



NMED Photolog
Photo #7

Photographer:	Sarah Holcomb	Date:	12-17-2013
Location:	EXPO New Mexico, Albuquerque, Bernalillo County, NM		
Description:	The second diversion structure/berm installed to divert run-on away from the CAFO portion of EXPO's facility.		



NMED Photolog
Photo #8

Photographer:	Sarah Holcomb	Date:	12-17-2013
Location:	EXPO New Mexico, Albuquerque, Bernalillo County, NM		
Description:	View of the facility's roads within the CAFO area. To the right in the far background is the facility's racetrack. This road previously contained drop inlets that carried CAFO wastewater directly to the AMAFCA storm sewers. The drop inlets have since been disconnected by installing a sheet of corrugated metal and some pond liner and then paving over the area with asphalt.		



NMED Photolog
Photo #9

Photographer:	Sarah Holcomb	Date:	12-17-2013
Location:	EXPO New Mexico, Albuquerque, Bernalillo County, NM		
Description:	In the barn areas, fresh dirt is brought in to facilitate infiltration of stormwater and to allow for proper grading to ensure that the wastewater is directed to the treatment system.		



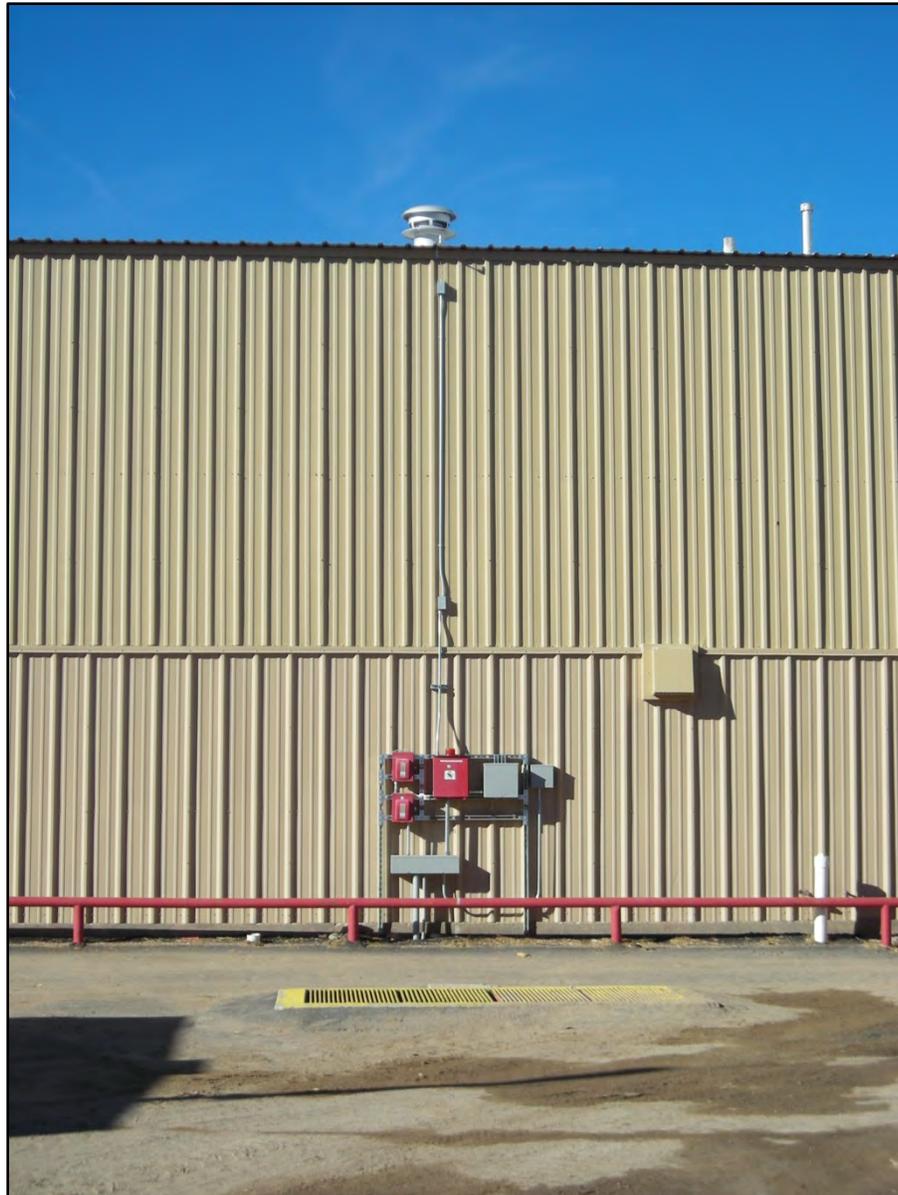
NMED Photolog
Photo #10

Photographer:	Sarah Holcomb	Date:	12-17-2013
Location:	EXPO New Mexico, Albuquerque, Bernalillo County, NM		
Description:	View of the facility's wastewater treatment system. The photographer is standing on the first grate, which contains a settling chamber and trash collection device. The wastewater is then routed to the second chamber (in the background) where it is pumped to the ABCWUA's treatment system.		



NMED Photolog
Photo #11

Photographer:	Sarah Holcomb	Date:	12-17-2013
Location:	EXPO New Mexico, Albuquerque, Bernalillo County, NM		
Description:	The facility's rain gauge, which shuts off the pump to ABCWUA's system in the event of a rain storm. This prevents inflow and infiltration into the Authority's system.		



NMED Photolog
Photo #12

Photographer:	Sarah Holcomb	Date:	12-17-2013
Location:	EXPO New Mexico, Albuquerque, Bernalillo County, NM		
Description:	Rain gauge/pump panel. The system does allow for a manual override to pump even when the rain gauge has stopped the system.		



NMED Photolog
Photo #13

Photographer:	Sarah Holcomb	Date:	12-17-2013
Location:	EXPO New Mexico, Albuquerque, Bernalillo County, NM		
Description:	View of the dam to contain wastewater from the CAFO on the south side of the facility. The facility is designed with capacity to hold the 25 year/24 hour storm, plus two additional feet of freeboard to allow for subsequent storms.		



NMED Photolog
Photo #14

Photographer:	Sarah Holcomb	Date:	12-17-2013
Location:	EXPO New Mexico, Albuquerque, Bernalillo County, NM		
Description:	This is the storm surge side of the dam still used by the City of Albuquerque during storm events. The inputs are as follows: <ol style="list-style-type: none">1) These culverts are part of the 2-pond storm surge system. This in inflow from pond #1/.2) Storm flow directed from Louisiana Road, underneath the CAFO area at EXPO, and daylighting in this storm surge pond.3) This is the pipe that contains the uncontaminated roof runoff in the barn area (from the disconnected downspouts).		



NMED Photolog
Photo #15

Photographer:	Sarah Holcomb	Date:	12-17-2013
Location:	EXPO New Mexico, Albuquerque, Bernalillo County, NM		
Description:	The outflow from the storm surge pond to the AMAFCA system.		



NMED Photolog
Photo #16

Photographer:	Sarah Holcomb	Date:	12-17-2013
Location:	EXPO New Mexico, Albuquerque, Bernalillo County, NM		
Description:	View of the dam. The right side is the CAFO wastewater retention area. The left side is the storm surge pond used by the City of Albuquerque.		

