



**NEW MEXICO  
ENVIRONMENT DEPARTMENT**

***Surface Water Quality Bureau***

**SUSANA MARTINEZ  
Governor**

**JOHN A. SANCHEZ  
Lieutenant Governor**

Harold Runnels Building, N2050  
1190 South St. Francis Drive (87505)  
P.O. Box 5469, Santa Fe, NM 87502-5469  
Phone (505) 827-0187 Fax (505) 827-0160  
[www.nmenv.state.nm.us](http://www.nmenv.state.nm.us)



**RYAN FLYNN  
Cabinet Secretary - Designate**

**BUTCH TONGATE  
Deputy Secretary**

**THOMAS SKIBITSKI  
Acting Director  
Resource Protection Division**

---

**Certified Mail - Return Receipt Requested**

April 30, 2013

Mr. Rick Baugh, General Manager  
Sunland Park Racetrack and Casino  
1200 Futurity Drive  
Sunland Park, NM 88063

Re: Concentrated Animal Feeding Operation, SIC 7948, NPDES Compliance Evaluation Inspection,  
Sunland Park Racetrack and Casino, NPDES Permit NMG010028, April 4, 2013

Dear Mr. Baugh:

Enclosed please find a copy of the report 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.

Problems noted during this inspection are discussed in the Further Explanations section of the inspection report. You are encouraged to review the inspection report and required to correct any problems noted during the inspection and to modify your operational and/or administrative procedures, as appropriate. Further, you are encouraged to notify, in writing, both USEPA (Diana McDonald, (6EN-WM) and Abu Senkayi (6EN-WR), 1445 Ross Ave., Dallas, Texas 75202) and NMED (at above address) regarding modifications and compliance schedules.

I wish to thank you for the cooperation extended to the NMED personnel by Ms. Sylvia Porter while at this facility. If you have any questions about this inspection report, please contact me at (505) 222-9587 or [sarah.holcomb@state.nm.us](mailto:sarah.holcomb@state.nm.us).

Sincerely,

Sarah Holcomb  
Environmental Scientist/Specialist  
NMED Surface Water Quality Bureau

Cc: Hannah Branning, USEPA (6EN-AS) by e-mail  
Carol Peters-Wagnon, USEPA (6EN-WM) by e-mail  
Diana McDonald, USEPA (6EN-WM) by e-mail  
Rashida Bowlin, USEPA (6EN-AS) by e-mail  
Abu Senkayi, USEPA (6EN-WR) by e-mail  
Darlene Whitten-Hill, USEPA (6EN-WM) (by e-mail)  
Mike Kesler, Acting NMED District 3 Manager (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 <input type="text" value="N"/> 2 <input type="text" value="5"/> 3 <input type="text" value="N"/> <input type="text" value="M"/> <input type="text" value="G"/> 4 <input type="text" value="0"/> 5 <input type="text" value="1"/> 6 <input type="text" value="0"/> 7 <input type="text" value="0"/> 8 <input type="text" value="2"/> 9 <input type="text" value="8"/> 10 <input type="text" value="1"/> 11 <input type="text" value="3"/> 12 <input type="text" value="0"/> 13 <input type="text" value="4"/> 14 <input type="text" value="0"/> 15 <input type="text" value="4"/> 16 <input type="text" value="17"/> 18 <input type="text" value="="/> 19 <input type="text" value="S"/> 20 <input type="text" value="3"/>	Remarks				
<input type="text" value="L"/> <input type="text" value="A"/> <input type="text" value="R"/> <input type="text" value="G"/> <input type="text" value="E"/> <input type="text" value="C"/> <input type="text" value="A"/> <input type="text" value="F"/> <input type="text" value="O"/> <input type="text" value="R"/> <input type="text" value="A"/> <input type="text" value="C"/> <input type="text" value="E"/> <input type="text" value="T"/> <input type="text" value="R"/> <input type="text" value="A"/> <input type="text" value="C"/> <input type="text" value="K"/>					
Inspection Work Days	Facility Evaluation Rating	BI	QA	Reserved	
67 <input type="text" value=""/> <input type="text" value=""/> <input type="text" value=""/> 69	70 <input type="text" value="2"/>	71 <input type="text" value="N"/>	72 <input type="text" value="N"/>	73 <input type="text" value=""/> <input type="text" value=""/>	74 <input type="text" value=""/> 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) SUNLAND PARK RACETRACK AND CASINO, SUNLAND PARK, DONA ANA COUNTY, NM: From I-10, take Exit 13 onto Sunland Park Dr. toward Paisano Dr. Take the ramp on the right to merge onto Sunland Park Dr. Turn left on Doniphan Dr. Turn right onto NM-498/Racetrack Dr., then slight right onto Futurity Dr.	Entry Time /Date 1015 hours / 4-4-2013	Permit Effective Date 9-3-2009
	Exit Time/Date 1210 hours / 4-4-2013	Permit Expiration Date 9-2-2014
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Ms. Sylvia Porter, Compliance Officer (915) 346-2785	Other Facility Data GPS: N. 31° 48' 16.1" W. 106° 33' 33.8"	
Name, Address of Responsible Official/Title/Phone and Fax Number Mr. Rick Baugh, General Manager, Sunland Park Racetrack and Casino (575) 874-5200 1200 Futurity Dr., Sunland Park, NM 88063	Yes <input type="checkbox"/> * <input checked="" type="checkbox"/> No <input type="checkbox"/>	SIC: 7948 0242

#### Section C: Areas Evaluated During Inspection

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

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

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

- Inspector arrived onsite at 1015 hours on April 4, 2013 and conducted an entrance interview with Mr. Rick Baugh, General Manager, where she made introductions, presented her credentials and explained the purpose of the inspection. Ms. Sylvia Porter, Compliance Officer for the racetrack, joined the inspection and accompanied the inspector on a tour of the facility. The onsite PPP was not available on the day of the inspection due to its location in Mr. Robert Cantu's (Risk Manager) locked office. A preliminary exit interview was conducted with Ms. Porter at the site on April 4, 2013. A copy of the PPP was received by the inspector at the NMED offices in Albuquerque on April 9, 2013. A follow up exit interview was conducted over the phone with Mr. Cantu on April 22, 2013.
- Additional documentation related to the PPP was received by the inspector on April 30, 2013.
- Please see the inspection report for further findings.

Name(s) and Signature(s) of Inspector(s) Sarah Holcomb	Agency/Office/Telephone/Fax 505-222-9587	Date
Signature of Management QA Reviewer Bruce Yurdin	Agency/Office/Phone and Fax Numbers 505-827-2798	Date

**CONCENTRATED ANIMAL FEEDING OPERATION (CAFO)  
INSPECTION REPORT**

**I. FACILITY OPERATION INFORMATION AND PERMIT VERIFICATION**

1. Number and type of animals confined and maintained at this facility:

<u>Type of CAFO</u>	<u>No. of Animals</u>
<input type="checkbox"/> Dairy (Cattle)	_____
<input type="checkbox"/> Slaughter/feeder cattle	_____
<input type="checkbox"/> Swine (over 55 lbs.)	_____
<input checked="" type="checkbox"/> Horses	1900
<input type="checkbox"/> Sheep or lambs	_____
<input type="checkbox"/> Chickens	_____
<input type="checkbox"/> Turkeys	_____
<input type="checkbox"/> Ducks	_____
<input type="checkbox"/> Other _____	_____

2. Number of days animals are stabled/confined and fed/maintained over any 12 month period:

45 days or more       less than 45 days

3. What is the 25-year/24-hour rainfall amount for this location? 2.9 inches (from ).

4. Receiving waters (Inc. basin/watershed) Sunland Park MS4 (specifically the Montoya Drain within the Elephant Butte Irrigation District's service area), thence to the Rio Grande in 20.6.4.101 NMAC.

5. Copy of Notice of Intent on-site? Yes  No  NA

Permittee had not applied for coverage under the 2009 General Permit. EPA (at the time of the drafting of this inspection report) did not have any record of discharges from this facility.

6. Copy of permit on-site? Yes  No  NA

7. FONSI or EIS on-site?\* Yes  No  NA

\*For new or expanded facilities after 2-10-93

8. Groundwater discharge plan #DP None? Yes  No  NA

The facility does not have a current discharge permit for their ponds with the NMED Ground Water Quality Bureau.

**II. PROPER OPERATION AND MAINTENANCE** S  M  U

1. Solid and/or liquid wastes handled properly to prevent surface and/or groundwater pollution using recognized practices of good agricultural management? S  M  U

2. Liquid retention facility maintained at a level so it will retain a 25-year, 24-hour rainfall event? Yes  No

3. Ditches, dikes, berms, or terraces, designed to carry peak flows expected at times when the 25-year, 24-hour rainfall event occurs, used to isolate open lots and associated wastes from outside surface drainage? Yes  No  NA

4. New facility located outside of waters of the U.S.? Yes  No  NA

5. Do the animals confined at the CAFO come into direct contact with waters of the U.S.? Yes  No

6. CAFOs or wastewater retention facilities, not protected from flood, located in the 100-year flood plain?

Yes\_\_\_No\_X\_\_

7. Facility designed to protect public or private wells, surface drinking water supplies and other environmental or public health concerns? Yes\_X\_No\_\_\_NA\_\_\_

8. Waste handling, treatment and management results in the destruction or adverse modification of the critical habitat of, or contribute to the taking of, endangered or threatened species of plants, fish, or wildlife? Yes\_\_\_No\_X\_\_

9. Pesticides properly handled and disposed of in a manner to prevent any significant pollutants from entering waters of the U.S.? Yes\_X\_No\_\_\_NA\_\_\_

10. Dead animals properly disposed of within 3 days by the racetrack personnel. Remains are hauled to the Camino Real Landfill, where they are disposed of by incineration. Yes\_X\_No\_\_\_

11. Appropriate measures available to prevent and clean up spills of toxic pollutants, including material handling procedures in areas of potential spills? Yes\_X\_No\_\_\_NA\_\_\_

12. Facility compliant with applicable requirements for discharges through a MS4 serving a population of 100,000 or more? MS4 operator City of Sunland Park Yes\_\_\_No\_\_\_NA\_X\_\_

III. POLLUTION PREVENTION PLAN (PPP) S\_\_\_M\_\_\_U\_X\_\_

A. Preparation S\_\_\_M\_X\_U\_\_\_

1. Prepared in accordance with good engineering practices and include measures necessary to limit pollutants in runoff? Yes\_X\_No\_\_\_

2. Identify individual(s) responsible for developing and implementing PPP? Yes\_X\_No\_\_\_

3. Signed by owner or signatory authority? Yes\_\_\_No\_X\_\_

4. Copy retained on-site? Yes\_X\_No\_\_\_

5. PPP refers to SCS plan for facility design, construction criteria, and waste management? Yes\_\_\_No\_X\_\_

6. SCS plan retained on-site? Yes\_\_\_No\_\_\_NA\_X\_\_

7. Plan amended prior to any change in design, construction, operation, or maintenance, or if plan is ineffective in controlling pollutants in discharges? Yes\_\_\_No\_X\_\_NA\_\_\_

B. Description of potential pollutant sources S\_\_\_M\_X\_U\_\_\_

1. Site map indicating an outline of each drainage area, structural controls and surface water? Yes\_\_\_No\_X\_\_

2. List of any materials that are used, stored, and disposed of at facility? Yes\_X\_No\_\_\_NA\_\_\_

3. List of any spills of materials such as pesticides, cleaning agents, fuel, and other pollutants? Yes\_\_\_No\_X\_\_NA\_\_\_

C. Waste management controls S\_\_\_M\_\_\_U\_X\_\_

1. Location and description of structural and non-structural controls? Yes\_X\_No\_\_\_

a. Inspected 4 times per year for structural integrity and maintenance? Yes\_X\_No\_\_\_

b. Dates and findings of each inspection logged and retained on-site? Yes\_X\_No\_\_\_

- c. Document site specific information used to determine retention capacity and land application rates?  
Yes  No \_\_\_ NA \_\_\_
- d. All retention structure design and construction, at a minimum, in accordance with current (at the time of construction) NRCS technical standards?  
Yes  No \_\_\_

**2. Document existing retention facility capacity and the assumptions and calculations used in determining the capacity?**  
**Current capacity Between the two lined ponds, the PPP calculates 3.67 acre feet of storage for the backside, while the 25 year, 24 hour storm event would generate 4.3 acre feet.** S \_\_\_ M \_\_\_ U

- a. Structures built and maintained in accordance with site specific NRCS plans and specifications?  
Yes  No \_\_\_

If yes, are in compliance with the design and capacity requirements if conditions remained unchanged.

- b. Calculations of retention capacity based on 25-year, 24-hour storm? Yes \_\_\_ No  NA \_\_\_

c. Retention facilities sized based upon the following volumes:

- (1) Runoff volume from open lot surfaces? Yes  No \_\_\_ NA \_\_\_
- (2) Runoff volume from areas between open lot surfaces and retention facility?  
Yes  No \_\_\_ NA \_\_\_
- (3) Rainfall multiplied by the surface area of the retention facility and all wastes basins?  
Yes  No \_\_\_ NA \_\_\_
- (4) Runoff from roofed areas that enters retention facilities? Yes  No \_\_\_ NA \_\_\_
- (5) All wastes and process generated wastewater for a period of at least 21 days, including:
  - (a) Volume of wet manure? Yes \_\_\_ No  NA \_\_\_
  - (b) Volume of water used for manure removal? Yes \_\_\_ No  NA \_\_\_
  - (c) Volume of clean up and wash water? Yes \_\_\_ No  NA \_\_\_
  - (d) Other water (spilled drinking water, etc.)? Yes \_\_\_ No  NA \_\_\_

**3. Retention facility embankments** S \_\_\_ M  U \_\_\_

- a. Existing facilities properly maintained and show no signs of structural breakage? Yes  No \_\_\_ NA \_\_\_
- If yes, are considered to be properly constructed.

- b. Document design standards? Yes \_\_\_ No  NA \_\_\_

c. Minimum design standards:

- (1) Soils free of foreign materials? Yes  No \_\_\_ NA \_\_\_
- (2) Constructed in layers no thicker than 6" and compacted at optimum moisture content?  
Yes  No \_\_\_ NA \_\_\_
- (3) Site specific variation documented by a professional engineer or in accordance with NRCS design standards?  
Yes \_\_\_ No \_\_\_ NA
- (4) Embankment walls stabilized to prevent erosion?  
How stabilized \_\_\_\_\_ Plastic lined  \_\_\_\_\_  
Yes  No \_\_\_ NA \_\_\_

4. **Retention facility dewatering** S \_\_\_ M \_\_\_ U  X \_\_\_

\_\_\_ Irrigation  X \_\_\_ Evaporation \_\_\_ Other \_\_\_\_\_

a. Schedule for liquid waste removal? Yes \_\_\_ No  X \_\_\_

b. Retention facility has a minimum of 1 foot of freeboard (preferably 2 feet) above the 25-year, 24-hour design capacity? Yes \_\_\_ No  X \_\_\_

c. Weekly log of specific measurements of wastewater level? Yes \_\_\_ No  X \_\_\_

d. Dewatering equipment available if necessary? Yes  X \_\_\_ No \_\_\_

e. Sufficient freeboard maintained to contain runoff from a 25-year, 24-hour storm event? Yes \_\_\_ No  X \_\_\_

f. Freeboard restored after any rain, accumulation of wastes or process generated wastewater? Yes \_\_\_ No  X \_\_\_

5. **Permanent marker installed and maintained within the retention facility to show volume required for a 25-year, 24-hour rainfall event (visible from the top of the levee)?** Yes \_\_\_ No  X \_\_\_ NA \_\_\_

6. **Rain gauge installed on-site and a log kept of all measurable rainfall events?** Yes  X \_\_\_ No \_\_\_

7. **Documentation of no significant hydrologic connection** S \_\_\_ M \_\_\_ U \_\_\_ X \_\_\_

a. Documentation of no liner requirement, or Yes \_\_\_ No  X \_\_\_ NA \_\_\_

(1) Written determination by SCS engineer, professional engineer or qualified groundwater scientist that a liner is not needed to prevent leakage; or Yes \_\_\_ No \_\_\_ NA  X \_\_\_

(2) Documentation, certified by a professional engineer or qualified groundwater scientist, that there will be no significant leakage from the retention structure, or that leakage would not migrate to surface waters? Yes \_\_\_ No  X \_\_\_ NA \_\_\_

(a) No significant leakage because in-situ materials have hydraulic conductivities no greater than  $1 \times 10^{-7}$  cm/sec with a thickness of 1.5 feet or greater, or its equivalent in other materials; or Yes \_\_\_ No \_\_\_ NA \_\_\_

(b) Leakage will not migrate to a surface water, including maps showing groundwater flow paths, or that the leakage enters a confined environment? Yes \_\_\_ No \_\_\_ NA \_\_\_

b. Liner construction and maintenance Yes \_\_\_ No \_\_\_ NA \_\_\_

(1) Liner construction S \_\_\_ M \_\_\_ U \_\_\_

(a) NRCS liner requirements or liners designed, constructed and maintained in accordance with NRCS design specifications in Technical Note 716 (or current equivalent) in consideration of site-specific conditions; or Yes \_\_\_ No \_\_\_ NA \_\_\_

(b) Liner constructed to have hydraulic conductivities no greater than  $1 \times 10^{-7}$  cm/sec with a thickness of 1.5 feet or greater or its equivalency in other materials where no site-specific assessment has been done by a SCS engineer, professional engineer or qualified groundwater scientist? No information about the liners was included in the facility's PPP. Yes \_\_\_ No \_\_\_ NA \_\_\_

(2) Liner maintenance S \_\_\_ M \_\_\_ X \_\_\_ U \_\_\_

(a) Liners protected from animals by fences or other protective devices? Yes  X \_\_\_ No \_\_\_

- (b) Trees allowed to grow at such a distance, that the root zone extends into the liner?  
Yes\_\_\_No\_X\_\_
- (c) Any mechanical or structural damage to the liner evaluated by a NRCS engineer, professional engineer or qualified groundwater scientist within 30 days of damage?  
Yes\_\_\_No\_\_\_NA\_X\_\_
- (d) Documentation of liner maintenance kept with the PPP? Yes\_\_\_No\_X\_\_NA\_\_\_
- (e) Documentation review and site evaluation conducted by a NRCS engineer, professional engineer or qualified groundwater scientist every 5 years?  
Yes\_\_\_No\_X\_\_NA\_\_\_
- (f) Documentation of compliance with notification to install a leak detection system or monitoring wells, and 3 years sampling data (1st year sampling data retained for life of facility) kept with the PPP?  
Yes\_\_\_No\_X\_\_NA\_\_\_

**8. Wastewater removal and land application**

**S\_\_\_M\_\_\_U\_X\_\_**

- a. Facility has a schedule of wastewater removal by contract hauler capable of dewatering the retention facilities?  
Yes\_\_\_No\_\_\_NA\_X\_\_
- b. Facility has evaporation systems capable of dewatering the retention facilities? Yes\_\_\_No\_X\_\_NA\_\_\_  
Facility relies on passive evaporation to reduce the water in the ponds.
- c. Facility has irrigation systems capable of dewatering the retention facilities? Yes\_\_\_No\_\_\_NA\_X\_\_
- (1) PPP includes all calculations, as well as, all factors used in determining land application rates, acreage, and crops?  
Yes\_\_\_No\_\_\_
- (2) Land application rates
- (a) Land application rates exceed the nutrient uptake of the crop coverage or planned crop planting with any land application of wastewater and/or manure? Yes\_\_\_No\_\_\_
- (b) Where land application rates exceed the crop nutrient uptake rates, as provided in an approved state program, are application sites isolated from surface waters and no potential exists for runoff to reach a water of the U.S.?  
Yes\_\_\_No\_\_\_NA\_\_\_
- (3) The discharge or drainage of irrigated wastewater results in a discharge to water of the U.S.?  
Yes\_\_\_No\_\_\_
- (4) Wastewater irrigated when ground is frozen or saturated or during rainfall events (unless discharges, due to chronic or catastrophic rainfall, are to land application sites for filtering prior to discharging directly to waters of the U.S.)?  
Yes\_\_\_No\_\_\_
- (5) Irrigation practices managed so as to reduce or minimize ponding, puddling, and nuisance conditions such as odors and flies?  
Yes\_\_\_No\_\_\_
- (6) Facilities including ponds, pipes, ditches, pumps, diversion and irrigation equipment maintained to insure ability to fully comply with the terms of the permit and PPP?  
Yes\_\_\_No\_\_\_
- (7) Adequate equipment and/or land application area available for removal of such waste and wastewater as required to maintain the retention capacity of the facility?  
Yes\_\_\_No\_\_\_
- d. Wastewater disposal causes or contributes to the taking of endangered species or interferes/harms migratory birds?  
Yes\_\_\_No\_X\_\_

**9. Manure and pond solids handling and land application**

**S\_\_\_M\_X\_\_U\_\_\_**

- a. On-premises land application? Yes\_\_\_No\_X\_\_
- (1) Description of manure handling procedures and equipment availability? Yes\_\_\_No\_\_\_
- (2) Calculations and assumptions used for determining land application rates? Yes\_\_\_No\_\_\_
- (3) Nutrient analysis data if laboratory analysis performed? Yes\_\_\_No\_\_\_NA\_\_\_
- (4) Date, location, and amount of manure and/or retention basin waste applied? Yes\_\_\_No\_\_\_
- (5) Waste applied to land when the ground is frozen or saturated, or during rainfall events? Yes\_\_\_No\_\_\_
- (6) Manure applied at appropriate times and rates according to crop needs? Yes\_\_\_No\_\_\_
- (7) Discharge (runoff) of waste from the application site? Yes\_\_\_No\_\_\_
- (8) Edge-of-field, grassed strips used to separate watercourses from runoff carrying eroded soil and manure particles? Yes\_\_\_No\_\_\_
- (9) Land subject to excessive erosion avoided? Yes\_\_\_No\_\_\_
- (10) Where land application rates exceed the crop nutrient uptake rates, as provided in an approved state program, are application sites isolated from surface waters and no potential exists for runoff to reach a water of the U.S.? Yes\_\_\_No\_\_\_NA\_\_\_
- (11) Disposal of manure causes or contributes to the taking of endangered species or interferes/harms migratory birds? Yes\_\_\_No\_\_\_
- b. Off-premises land application - manure sold or given away Yes\_\_\_No\_X\_\_
- (1) Log of manure removed from facility, including date of removal, name of hauler, and quantity of waste removed? Yes\_\_\_No\_\_\_
- (2) Nutrient sample analysis given to hauler? Yes\_\_\_No\_\_\_NA\_\_\_
- c. Adequate manure storage capacity provided, based upon manure and waste production and land availability? Yes\_\_\_No\_X\_\_ Manure storage not addressed in plan.
- d. Storage and/or surface disposal of manure in the 100-year flood plain or near watercourses not protected by adequate berms or other structures? Yes\_\_\_No\_X\_\_NA\_\_\_
- e. Runoff from manure storage piles retained on-site? Yes\_\_\_No\_\_\_NA\_X\_\_
- f. Document practices which minimize waste manure transport to watercourses in PPP? Yes\_\_\_No\_\_\_NA\_X\_\_
- D. Preventive maintenance S\_\_\_M\_X\_U\_\_\_**
- 1. PPP includes an appropriate schedule for preventive maintenance? Yes\_X\_No\_\_\_**
- 2. Preventive maintenance program involves:**
- a. Inspection and maintenance of all runoff management devices (cleaning separators, catch basins)? Yes\_X\_No\_\_\_

b. Inspection and testing of facility equipment and containment structures? Yes  No

3. Maintenance log kept which documents preventive maintenance done? Yes  No

E. Sediment and erosion prevention S  M  U

1. Areas which have a high potential for significant soil erosion identified? Yes  No  NA

2. Measures used to limit erosion and pollutant runoff identified? Yes  No  NA

F. Employee training S  M  U

1. Employees responsible for work activities relating to permit compliance regularly trained or informed of information pertinent to the proper operation and maintenance of the facility and waste disposal?

Yes  No  NA

2. Training includes (as appropriate):

a. Employees at all levels trained in the general components and goals of the PPP? Yes  No

b. Land application of wastes? Yes  No

c. Proper operation and maintenance of the facility? Yes  No

d. Good housekeeping and material management practices? Yes  No

e. Recordkeeping requirements? Yes  No

f. Spill response and clean up? Yes  No

3. Training dates, at appropriate frequencies for different levels of personnel, documented in the PPP? Yes  No  NA

G. Inspection and record keeping S  M  U

1. Person named in PPP as individual responsible for drafting and implementing the PPP responsible also for inspections and recordkeeping? Yes  No

2. Incidents such as spills and other discharges, including quantity and pollution potential, included in the records? Yes  No  NA

3. Visual inspections:

a. Designated equipment and facility areas inspected by the authorized person? Yes  No

Inspection reports received by NMED on April 30, 2013. Inspections cover the quarterly facility inspections, retention facility inspections, and manure and dead animal removal logs.

b. Material handling areas inspected for evidence of, or the potential for, pollutants entering the drainage system? Yes  No  NA

c. A follow-up procedure used to ensure that appropriate action has been taken in response to the inspection? Yes  No

4. Site inspection:

a. Complete inspection of the facility by the authorized person at least once/year? Yes  No

b. The inspection includes verification that:

(1) The description of potential pollutant sources is accurate? Yes  No

(2) The drainage map has been updated or otherwise modified to reflect current conditions?  
Yes\_\_\_No\_X\_\_NA\_\_\_

(3) The controls outlined in the PPP to reduce pollutants are being implemented and are adequate?  
Yes\_\_\_No\_X\_\_

c. A report made documenting the findings of the inspection and retained as part of the PPP?  
Yes\_\_\_No\_X\_\_

5. **Records maintained on-site for a minimum of 3 years?** Yes\_X\_\_No\_\_\_

**IV. MONITORING AND REPORTING REQUIREMENTS** S\_X\_\_M\_\_\_U\_\_\_

**A. Notification of discharge?** Yes\_\_\_No\_\_\_NA\_X\_\_

1. Immediate verbal notice to EPA? Yes\_\_\_No\_\_\_

2. Written notice within 14 days to EPA and NMED/SWQB, Santa Fe, and document in PPP?  
Yes\_\_\_No\_\_\_

a. Description and cause of the discharge, including an estimate of the flow and volume discharged?  
Yes\_\_\_No\_\_\_

b. Dates, times, and if not corrected, the anticipated duration of discharge? Yes\_\_\_No\_\_\_

c. Document steps being taken to reduce, eliminate, and prevent recurrence? Yes\_\_\_No\_\_\_

d. Information from the on-site rain gauge concerning the size of the precipitation event, if caused by a precipitation event?  
Yes\_\_\_No\_\_\_

**B. Sampling of discharge?** Yes\_\_\_No\_\_\_NA\_X\_\_

1. Sampling location adequate for representative samples and taken from the overflow or discharge structure?  
Yes\_\_\_No\_\_\_

2. Parameters and sampling frequency agree with permit? Yes\_\_\_No\_\_\_

3. A minimum of one grab sample taken within the 1st 30 minutes of discharge unless sampling waiver due to dangerous climatic conditions is documented? Yes\_\_\_No\_\_\_

4. Samples taken and analyzed in accordance with EPA approved methods for water analysis listed in 40 CFR Part 136?  
Yes\_\_\_No\_\_\_

5. Sample collection and analysis records retained with PPP?  
Yes\_\_\_No\_\_\_

a. Sampling date, time, and exact location? Yes\_\_\_No\_\_\_

b. Individual collecting the sample? Yes\_\_\_No\_\_\_

c. Analysis dates and times? Yes\_\_\_No\_\_\_

d. Individual performing the analysis? Yes\_\_\_No\_\_\_

e. Analytical methods/techniques used? Yes\_\_\_No\_\_\_

f. Analytical results consistent with DMR data? Yes\_\_\_No\_\_\_

**C. Laboratory**

**1. Contract laboratory used?**

Yes \_\_\_ No \_\_\_ NA\_X\_\_

Lab name \_\_\_\_\_

Lab address \_\_\_\_\_

Telephone \_\_\_\_\_ Contact \_\_\_\_\_

Material analyzed (irrigation wastewater, manure,  
discharges, etc.) \_\_\_\_\_

**V. CONSULTANTS**

**A. Consulting firm used?**

Yes \_\_\_ No \_\_\_

Firm name \_\_\_\_\_

Firm address \_\_\_\_\_

Telephone \_\_\_\_\_ Contact \_\_\_\_\_

NMED/SWQB  
Official Photograph Log  
Photo # 1

Photographer: Sarah Holcomb

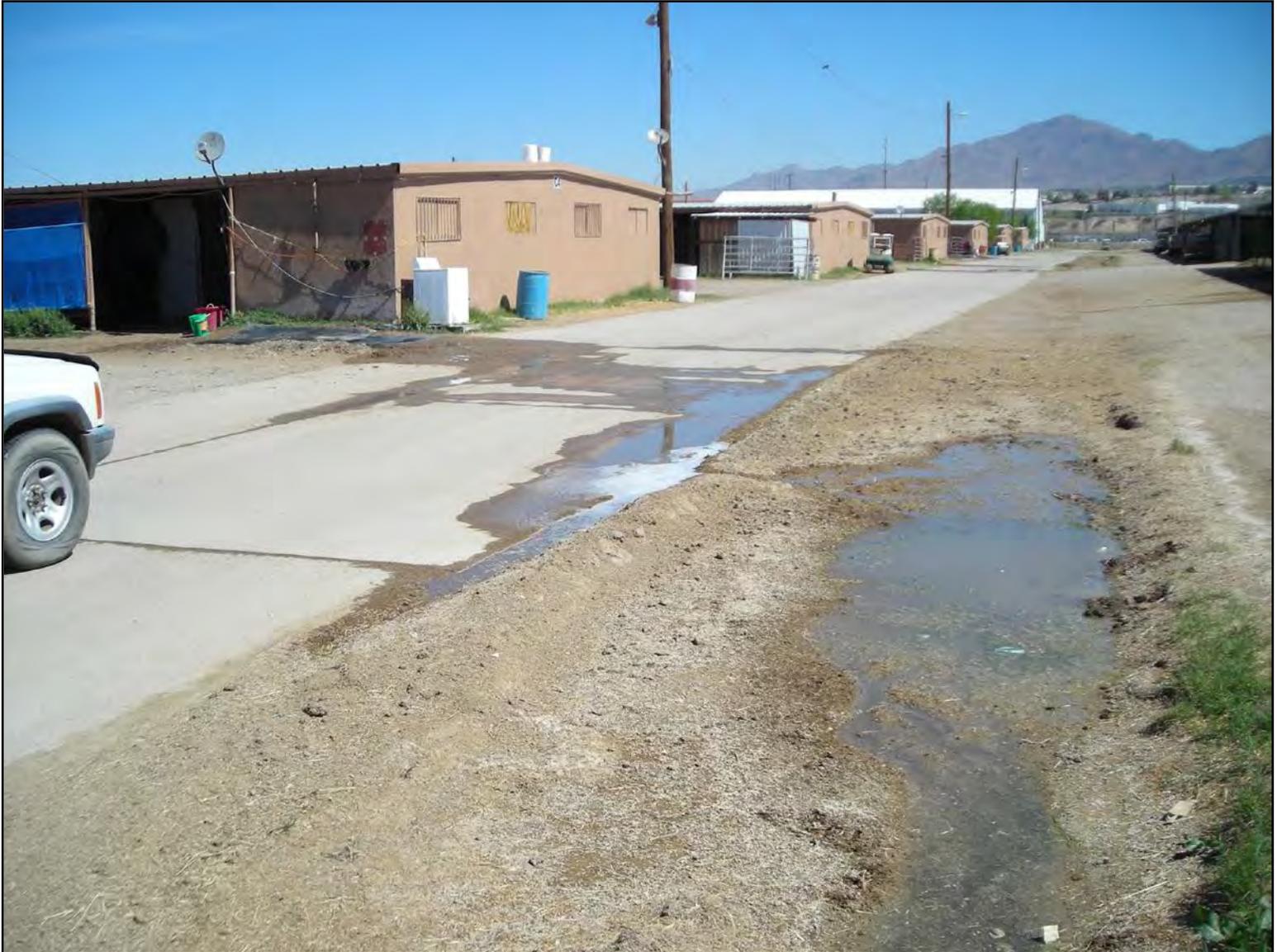
Date: 4-4-2013

Time: 1111 hours

City/County: Sunland Park/Doña Ana County

Location: Sunland Park Racetrack, on the frontside of the facility near the C-barns.

Subject: Washing machines (washing of horse blankets, etc.) are located outdoors and discharge to the street. This discharge goes to an old plugged drain, which used to go to the sanitary sewer. This drain is pumped out weekly and the water is discharged into the lined holding ponds on the backside of the facility.



NMED/SWQB  
Official Photograph Log  
Photo # 2

Photographer: Sarah Holcomb

Date: 4-4-2013

Time: 1127 hours

City/County: Sunland Park/Doña Ana County

Location: Sunland Park Racetrack, on the backside of the facility.

Subject: Lined retention ponds on backside of the facility. Liners were just replaced in 2012. The pond to the left is the smaller retention pond. The berm separates the larger retention pond, which is where most of the wastewater first ends up. These ponds passively evaporate and there is no mechanism to dewater if needed. Water is taken from these ponds and used for dust control around the facility.



NMED/SWQB  
Official Photograph Log  
Photo # 3

Photographer: Sarah Holcomb	Date: 4-4-2013	Time: 1109 hours
City/County: Sunland Park/Doña Ana County		
Location: Sunland Park Racetrack, on the frontside of the facility near the H-barns.		
Subject: One of 30-40 muck bins located at the facility. These bins are cleaned out multiple times per day as needed, according to the facility's representatives, and the recovered material is disposed of at the Camino Real Landfill nearby.		



Appendix A

Aerial photograph of the Sunland Park Racetrack.

Indicators are marked where the photographs shown in the report above were taken.

