NMP Technical Review
New Mexico General Permit No. NMG010000

Facility Name: All-American Ruidoso Downs, LLC
Ruidoso Downs Race Track & Casino
Post Office Box 449
Ruidoso Downs, New Mexico 88346

Permit No.: NMG010065

Type (ex: dairy, non-dairy cattle, etc): SIC Code 0272 (Horses) & 7948 (Horse Racing)

County: Lincoln

If located in Bernalillo, Chavez, Eddy, Sandoval, San Juan, or Valencia county, is EAP and metals testing included in NMP in accordance with Part III.D.8.b.

All CAFOs in the counties of Bernalillo, Chavez, Eddy, Sandoval, San Juan and Valencia must develop and implement soil sampling of land application sites once every five (5) years for the metals selenium, copper and zinc. The sampling may be performed concurrently with required phosphorus sampling.

Previously permitted: Yes

Noteworthy enforcement action: No
If no, previous permit no.: NMG010065

Receiving stream: n/a

Impaired waterbody: n/a

If so, for what pollutant(s): n/a

EPA approved or established TMDL: No

Antidegradation: No
Stream listed as Tier 2/2.5: No
Stream listed as Tier 3: No

NMP developed by certified specialist: Yes

NMP elements (other than land application and adequate storage) technically complete: Yes

Employee Training: Yes
Employee Training: Employees responsible for permit compliance must be regularly trained (annually) or informed of any information pertinent to the proper operation and maintenance of the facility and waste disposal. Training shall include topics such as proper operation and maintenance of the facility, good housekeeping and material management practices, necessary record-keeping requirements, and spill response and clean up.

Additional comments:
Ruidoso Downs Racing, Inc. operates Ruidoso Downs Race Track and Casino as a premier venue for Quarter Horses and Thoroughbred horse racing. The facility has been in operation as a racing facility since the 1930s, with the track's most recent modification performed in 1986- 1987. The facility houses approximately 1,800 horses in covered stables located at the racetrack. Drainage from the CAFO facilities is controlled and captured in runoff control basins (RCBs). Storm water runoff is directed to the Rio Ruidoso. There is no contact between the storm water runoff and the CAFO drainage runoff. Manure (and bedding) is generated from stable cleaning activities and from manure deposited on the ground in horse

transfer areas. Manure is transported from the stables and horse transfer areas to muck bins for temporary daily storage until it is hauled offsite.

NOI/NMP Administrative Review Check List
New Mexico General Permit No. NMG010000

Facility Name: All-American Ruidoso Downs, LLC
Permit Number: NMG010065

NOI (Form 2B) administratively complete: Yes
NMP included: Yes
NMP administratively complete: Yes

FEDERAL REGULATIONS	LOCATION IN NMP / COMMENTS
40 CFR Part 122.42(e)(1)(i): Ensure adequate storage of manure, litter, and process wastewater	3.1 Storage of Manure The CAFO will ensure adequate storage of manure, including procedures to ensure proper operation and maintenance of the storage facilities. The facility has three basic functional areas that can be segregated into the public entrance road, grandstand, casino and public parking area; the race track and infield area; and the stable area. the race track and public parking, grandstand and casino area account for over three-quarters of the facility area. the stables occupy approximately 31 acres in the eastern-northeastern area of the facility. The stable area is constructed on gently sloping and terraced land. Motor vehicle transportation is confined to improved site roads. Horse lanes are well established routes to and from the track area. the infield and stable area grounds are vegetated with grass, planted shrubbery, native vegetation and trees. Horse lanes and exercise areas called hot walkers, are surfaced with absorbent wood shavings to prevent horses and minimize drainage. 3.1.1 Manure Production The, Estimated Manure Production for an Equine Operation Table, was calculated using USDANRCS Agricultural Waste Management Field Handbook, Table 4-14. At a race track facility, the manure, reject feed and bedding is referred to as "muck". Muck consists of approximately 95% reject hay and wood shavings and about 5% is animal manure. Muck is stored for less than 24-hours in walled bins with concrete floors. The table is attached to this section. 3.1.2 Operation & Maintenance The facility is in operation each year beginning in May and closing in September. Race days are normally Thursday through Sunday. All horses are stabled (confined) under roof. Horsemen are allowed access to the track area for training from 6-10 am Wednesday thru Monday; otherwise, horses are only on the track for races. Jockey paddock is only utilized during race days. Horsemen are required to comply with strict stable rules that support the track's operational BMPs. Manure is hauled off-site to prevent discharges from the storage structures and stables. The stables are cleaned daily, and the muck is placed in the bins. Muck from the stables is initially placed in a muck bin that has three sides and a concrete floor. The collection bin walls consolidate the muck to what is typically a 10' x 20' footprint and confines the muck on a concrete floor. The muck material is highly absorbent and most direct rainfall on the bins is retained in the muck. Each day the muck is removed from the bins. A contract hauler removes

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	the muck from the facility and is hauled to an off-site compost facility; none of the waste is land applied or stored at the CAFO facility. The off-site compost facility is registered and operated in accordance with guidelines by the State of New Mexico Environment Department. The name of the transportation company and disposal facility is as follows: • Transporter: Tanner Irons Trucking • Disposal Facility: AARD Composting Facility – Otero County, NM The transportation company while on Ruidoso Downs' premises shall report deficiencies and corrected immediately. Exercise walkers, called hot walkers, are deeply padded with wood shavings to cushion horse's feet and serves as an absorbent for any nutrients that are deposited while horses are on the walker. Manure will be collected from the animal walkways and walker areas regularly and place into the bins. 3.1.2 Process Generated Wastewater Volume Horses are groomed and washed on concrete wash racks in the stable area. this is the only process water generated in the stable area. Process water from the wash racks is drained immediately to the adjacent vegetated, infiltration buffer zones that absorb the water and act as filter strips. It is estimated that the water generated does not migrate more than a few yards beyond the wash rack and does not reach any of the storm water collection and sediment control basins.
40 CFR Part 122.42(e)(1)(ii): Mortality management.	The facility will properly dispose of mortality within 12 hours for postmortem examination animals will be hauled off-site for proper disposal.
40 CFR Part 122.42(e)(1)(iii): clean water diversion.	3.2.1 Storm Water Runoff The primary operations of Ruidoso Downs Race Track and Casino are segregated into two basic drainage areas that result in CAFO and Non-CAFO storm water runoff. All CAFO regulated drainage is controlled and captured in storm water runoff control basins. Non-CAFO regulated storm water runoff has been diverted and is drained to the Rio Ruidoso. 3.2.2 Storm Water Management in CAFO Drainage Area The stable and race track area are divided into north and south drainage basins. The CAFO regulated area accounts for approximately 31 acres. Stable roof water is captured and drained to the Rio Ruidoso via a segregated drainage system. All other CAFO runoff is captured in the storm water runoff control basins. The basins are a best management practice that allows the facility to capture sediment and silt from the drainage areas. The horse lanes are bermed as needed to prevent runoff from entering the Rio Ruidoso. The facility shall inspect runoff control basins weekly during operation (April-September) and repair any structural damage and remove excess sediment from these sediment control berms to ensure they are operating as designed. Instead of weekly inspections while the facility is closed (September 15 thru April 15 each year), the facility proposes quarterly inspections. The weekly/quarterly checklist is included as an attachment in Section 10 of the NMP. **3.2.3 Storm Water Management in Non-CAFO Drainage Area** Non-CAFO regulated runoff, including hillside drainage, public parking lots, grandstand and casino roofs, stable roofs and the public entry road is segregated and drained to dedicated storm drains. These drains discharge to the Rio Ruidoso.

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	Specifically, the public entrance and south parking lots are drained by curbing and open drains to the river. The grandstand and central parking lots are drained by a capture drain system in front of the grandstand that discharge to the river or to an open drain for the north parking lot. The north parking lot drains via an open drain and buried culvert system that carries the water to the river. This segregated drainage system also manages the majority of the hillside run-on entering the facility. Highway 70 is along the south side of the facility and constructed so that storm water is drained directly to the Rio Ruidoso. There is no contact between this non-regulated runoff and any CAFO-regulated runoff.
40 CFR Part 122.42(e)(1)(iv): Prevent direct contact of animals with water of US.	Animals confined at the CAFO shall not be allowed to come into direct contact with waters of the United States. Waters do flow through the production area. Horses do not have access to waters of the US.
40 CFR Part 122.42(e)(1)(v): Chemical handling.	The CAFO will ensure that chemicals and other contaminants handled on-site are handled according to label directions.
40 CFR Part 122.42.(e)(1)(vi): conservation practices, including buffers to control runoff	No land application of nutrients occurs at this site. Muck (manure, bedding and feed wastes) are transferred off-site daily.
40 CFR Part 412.4(c)(5): Setback requirements for down-gradient surface waters, open tile line intake structure, sinkhole, agricultural well head, or other conduit to surface water: 100 ft setback, 35 ft vegetative buffer, or compliance alternative.	No land application of nutrients occurs at this site. Muck (manure, bedding and feed wastes) are transferred off-site daily.
40 CFR Part 122.42(e)(1)(vii): protocols for testing of manure, soil, litter, or process wastewaters.	A representative wastewater and manure sample will be analyzed annually. The facility shall analyze according with Table 6.1. Recommended method(s) found in Manure Management Publications/Manure Characteristics: Section 1 Second Edition MWPS-18-S1; http://www.mwps.org/ The permittee shall follow the following monitoring procedures: • Any required monitoring must be conducted according to test procedures approved in 40 CFR Part 136, unless other test procedures have been specified in this permit or approved by the Regional Administrator. • The permittee shall calibrate and perform maintenance procedures on all monitoring and analytical instruments at intervals frequent enough to ensure accuracy of measurements and shall maintain appropriate records of such activities. • An adequate analytical quality control program (QA/QC), including the analyses of sufficient standards, spikes, and duplicate samples to ensure the accuracy of all required analytical results shall be maintained by the permittee or designated commercial laboratory.
40 CFR Part 412.4(c)(2): NMP must incorporate determination of application rates	No land application of nutrients occurs at this site. Muck (manure, bedding and feed wastes) are transferred off-site daily.
40 CFR Part 122.42(e)(1)(viii): protocols for land application.	No land application of nutrients occurs at this site. Muck (manure, bedding and feed wastes) are transferred off-site daily.

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40 CFR Part 412.4(c)(4): NMP must incorporate inspection of land application for leaks	Visual inspection of all water lines. Visual inspection of rain gauge. Daily except during a period between Sept 15-April 15th each year. CAFO is non-operational during this time and water lines are shut-off and not pressurized. Visual inspection of all storm water diversion devices, runoff diversion structures, and devices channeling storm water to wastewater and manure storage and containment structures. Visual inspection of the manure and basins. Documentation of depth of sediment in all basins.
40 CFR Part 122.42(e)(1)(ix): record keeping.	Table 5.1 includes Record Keeping Requirements and Schedule
Legible site map: of the production area (including, at a minimum, the animal confinement area, the manure storage area, the raw materials storage area, and the waste containment area), and the land application area. The map must also include flow direction, an outline of drainage areas to the process wastewater retention or control structures, structural controls, and surface water bodies.	• **Figure 2.1 - Vicinity Map** Figure 2.1, entitled Vicinity Map, was generated in ACAD using USGS digital line graph (DLG) transportation data obtained from Tiger Roads. The location of the facility is depicted on the map. • **Figure 2.2 – USGS 7.5-Minute Quadrangle Map** Figure 2.2, entitled USGS 7.5-Minute Quadrangle Map is a seamless, high-quality copy of the 7.5-minute USGS quadrangle map (Ruidoso Downs, New Mexico, quadrangle), that depicts the boundaries of land owned, operated, or controlled by the facility and used as part of the concentrated animal feeding operation and all springs, lakes, or ponds located on-site and within one mile of the facility boundaries. • **Figure 2.3 –Site Controls & Drainage Zones** Figure 2.3, entitled Site Controls and Drainage Zones, is a scaled drawing depicting the locations of the following information: • Site Controls/Best Management Practices – Retention (Sediment) Ponds • Drainage Basins • Designated CAFO Area • **Figure 2.4 – Site Map** Figure 2.4, entitled Site Map, is a scaled drawing depicting the locations of the following information: • Barns (Stables) • Race Track • Site Controls/Best Management Practices – Retention (Sediment) Ponds • Manure Storage Areas – Muck Bins • Drainage Flow Direction • Diversions/Berms • Outfalls and Drainage Culverts • **Figure 2.5 – FEMA Floodplain Map** Figure 2.5 is a map obtained from the FEMA Map Service Center-Interactive Map. Additional information concerning the floodplain is provided in Section 3.
Signature. The NMP shall be signed by the owner/operator or other signatory authority in accordance with Part VI.E (Signatory Requirements) of this permit.	Yes, signed by Jeff True (President and G.M.)