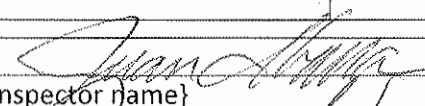
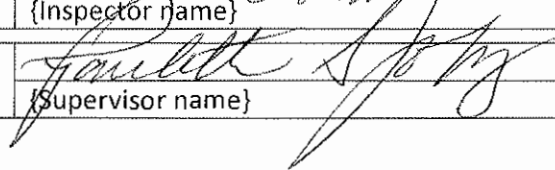




Region 6 Compliance Assurance and Enforcement Division INSPECTION REPORT

Inspection Date(s):	09/22/2015		
Media:	Water		
Regulatory Program(s)	CAFO		
Company Name:	Boyd Gaming Corporation		
Facility Name:	Delta Downs Racetrack, Casino and Hotel		
Facility Physical Location:	2717 Delta Downs Drive		
(city, state, zip code)	Vinton, LA 70668		
Mailing address:	2717 Delta Downs Drive		
(city, state, zip code)	Vinton, LA 70668		
County/Parish:	Calcasieu Parish		
Facility Contact:	Chuck Willhite	Director of Facilities	
	chuchwillhite@boydgaming.com		
FRS Number:	N/A		
Identification/Permit Number:	LA0120111		
Media Number:	N/A		
NAICS:	711212		
SIC:	7948		
Personnel participating in inspection:			
Chuck Willhite	Delta Downs	Director of Facilities	337-589-9006
Juan Ibarra	EPA R6/6EN-WC	Inspector	214-665-8493
Abu Senkayi	EPA R6/6EN-WC	Enforcement Officer	214-665-8403
EPA Lead Inspector Signature/Date	 {Inspector name}		2/10/2016 Date
Supervisor Signature/Date	 {Supervisor name}		2/10/16 Date

Section I - INTRODUCTION

PURPOSE OF THE INSPECTION

EPA Region 6 inspectors Juan Ibarra and Abu Senkayi arrived at the Boyd Gaming Corporation / Delta Downs Racetrack, Casino and Hotel (Delta Downs) at 1645 on September 22, 2015, for an unannounced inspection. We met with Mr. Chuck Willhite/Director of Facilities. We presented our credentials to Mr. Willhite and informed him that this was an EPA inspection to determine compliance with the Administrative Order issued on 8/26/2013 (CWA-06-2013-1875) and the Clean Water Act Concentrated Animal Feeding Operations (CAFO) regulations. The scope of the inspection is a full compliance evaluation.

FACILITY DESCRIPTION

Delta Downs is a large CAFO that operates a horse racetrack, with both a Quarter Horse and a Thoroughbred Season. When we arrived, there were approximately 200 horses stabled at the facility. Maximum capacity is 1,320 horses during racing season, but they normally stable around 1200 to 1300 horses. The facility has 22 barns, of which 20 barns have 60 stalls per barn, with the two other barns being a Receiving Barn and a Holding Barn.

Each barn has eight covered horse wash racks (four per side), two manure bins, and generally four walkers. Wastewater from the covered horse wash racks discharge to one of two lagoons thru a subsurface collection system. The collection system consists of a series of dual chamber settling tanks (one for each side of the barn) that send the wastewater into one of seven lift stations, each equipped with dual grinder pumps (for redundancy) and lighted alarms. The lift stations then send the wastewater to one of two retention lagoons. The east lagoon has a capacity of 9,542,300 gallons, and the west lagoon has a capacity of 12,614,300 (based on the As-Built drawings provided by Thompson Engineering, Inc.).

The new covered manure bins have extended wing walls and fixed curbing that provides excellent storm water protection (see the Appendix 1 photolog). The old manure bins were smaller (no wing walls) and uncovered. Additionally, the facility has implemented improved manure management controls and BMPs that will be described below.

Section II - OBSERVATIONS

Delta Downs responded to the requirements of EPA Administrative Order CWA-06-2013-1875 by eliminating the unpermitted discharge of horse wash rack wastewater to the adjacent off-property drainage channels. This was accomplished by the installation of a collection system consisting of covered horse wash racks that discharge into settling tanks (dual chambered septic tanks) plumbed to one of seven lift stations. The collection system routes the isolated wash rack wastewater to one of two lagoons, with the West Lagoon being a new unit.

Manure wastes are now contained within the new improved and roofed manure bins. Additionally, a new worker has been hired to specifically manage the manure bins and manure collection program, as well as keeping the production area clean. These management controls are supported by the purchase of a new tractor for her use as she cleans the grounds. This is reportedly her only job duty, and the tractor is a dedicated piece of equipment for this task.

We observed some tall vegetation and shrubs on the embankment of the East Lagoon. This lagoon should be kept mowed to prevent embankment perforation by plant roots such as the brush seen in photos 10 and 13. As the plants grow and become trees, the roots compromise the embankments integrity. Additionally, the West Lagoon only had about 3" of freeboard. Although the facility is diverting influent flows from Barns 12-22 to the East Lagoon, operational management of lagoon levels must be balanced between both lagoons. Wash rack flows from Barns 1-11 go directly into the West Lagoon, while influent flows from Barns 12-22 can be diverted into either lagoon. Aside from improvements in operational management of the two lagoons, other lagoon management options mentioned by Mr. Willhite included the current use of the water truck to take water out of the West Lagoon and use it for dust control, and possible improvement of the West Lagoon embankment elevation.

Section III – AREAS OF CONCERN

Delta Downs has not adequately maintained the East Lagoon embankment to remove brush. Lagoon embankment maintenance is a standard maintenance condition for all CAFOs.

The West Lagoon has not provided for a minimum of 1' of freeboard, and preferably 2' of freeboard. At the time of the inspection, the West Lagoon had about 3" of freeboard. **Section IV – FOLLOW UP**

Section IV – FOLLOW UP

A copy of inspection report detailing the two Areas of Concern will be sent to the facility. Also, Delta Downs will submit to EPA and LDEQ a signed certification indicating that the requirements of EPA's Order have been met. This certification shall include a summary of the completed work and photographs to document the actions taken.

Section V – LIST OF APPENDICES

Appendix 1 – Photo Log and Aerial Photo (showing location/direction of photographs) – 14 photos taken 9/22/15

Appendix 1

Photograph Log



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 1

Location: Delta Downs Racetrack, Casino and Hotel		
City: Vinton	Parish: Calcasieu	State: Louisiana



Photo File Name: P9220056

Date of Photo: 9-22-2015

Time of Photo: 1720

Photographer: Juan Ibarra

Description: Looking southwest at one of the improved manure bins located next to Barn 18. Note the tall roof that allows a tractor to clean-out the bin.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

Location: Delta Downs Racetrack, Casino and Hotel		
City: Vinton	Parish: Calcasieu	State: Louisiana



Photo File Name: P9220057

Date of Photo: 9-22-2015

Time of Photo: 1721

Photographer: Juan Ibarra

Description: Looking north, into the manure bin located next to Barn 18. Note the tall roof that allows a tractor to clean-out the bin, and the metal curbing at the bin entrance to prevent track-out.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 3

Location: Delta Downs Racetrack, Casino and Hotel		
City: Vinton	Parish: Calcasieu	State: Louisiana



Photo File Name: P9220058

Date of Photo: 9-22-2015

Time of Photo: 1721

Photographer: Juan Ibarra

Description: Looking northwest at one of the seven lift stations. This one is located next to Barn 18. Each lift station is equipped with dual grinder pumps (for redundancy) and a red light alarm integrated with the lift station's float system.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 4

Location: Delta Downs Racetrack, Casino and Hotel		
City: Vinton	Parish: Calcasieu	State: Louisiana



Photo File Name: P9220059

Date of Photo: 9-22-2015

Time of Photo: 1725

Photographer: Juan Ibarra

Description: Looking south at the manure bin located between Barns 13 and 14. The area in front of the manure bin has been kept clean and free of manure track-out. All of the manure bins were in this condition.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 5

Location: Delta Downs Racetrack, Casino and Hotel		
City: Vinton	Parish: Calcasieu	State: Louisiana



Photo File Name: P9220060

Date of Photo: 9-22-2015

Time of Photo: 1729

Photographer: Juan Ibarra

Description: Looking toward the south at the settling tank lids that are now located downstream of the covered horse wash racks (the corner of one is seen on the upper left with some black siding material around the fence).



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 6

Location: Delta Downs Racetrack, Casino and Hotel		
City: Vinton	Parish: Calcasieu	State: Louisiana



Photo File Name: P9220061

Date of Photo: 9-22-2015

Time of Photo: 1732

Photographer: Juan Ibarra

Description: Looking at one of the covered horse wash racks plumbed to the collection system. Note the new drain at the back of the wash rack, and the white cap at the former discharge route in the curbing.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 7

Location: Delta Downs Racetrack, Casino and Hotel		
City: Vinton	Parish: Calcasieu	State: Louisiana



Photo File Name: P9220062

Date of Photo: 9-22-2015

Time of Photo: 1733

Photographer: Juan Ibarra

Description: A broader view of the same covered horse wash rack plumbed to the collection system.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 8

Location: Delta Downs Racetrack, Casino and Hotel		
City: Vinton	Parish: Calcasieu	State: Louisiana

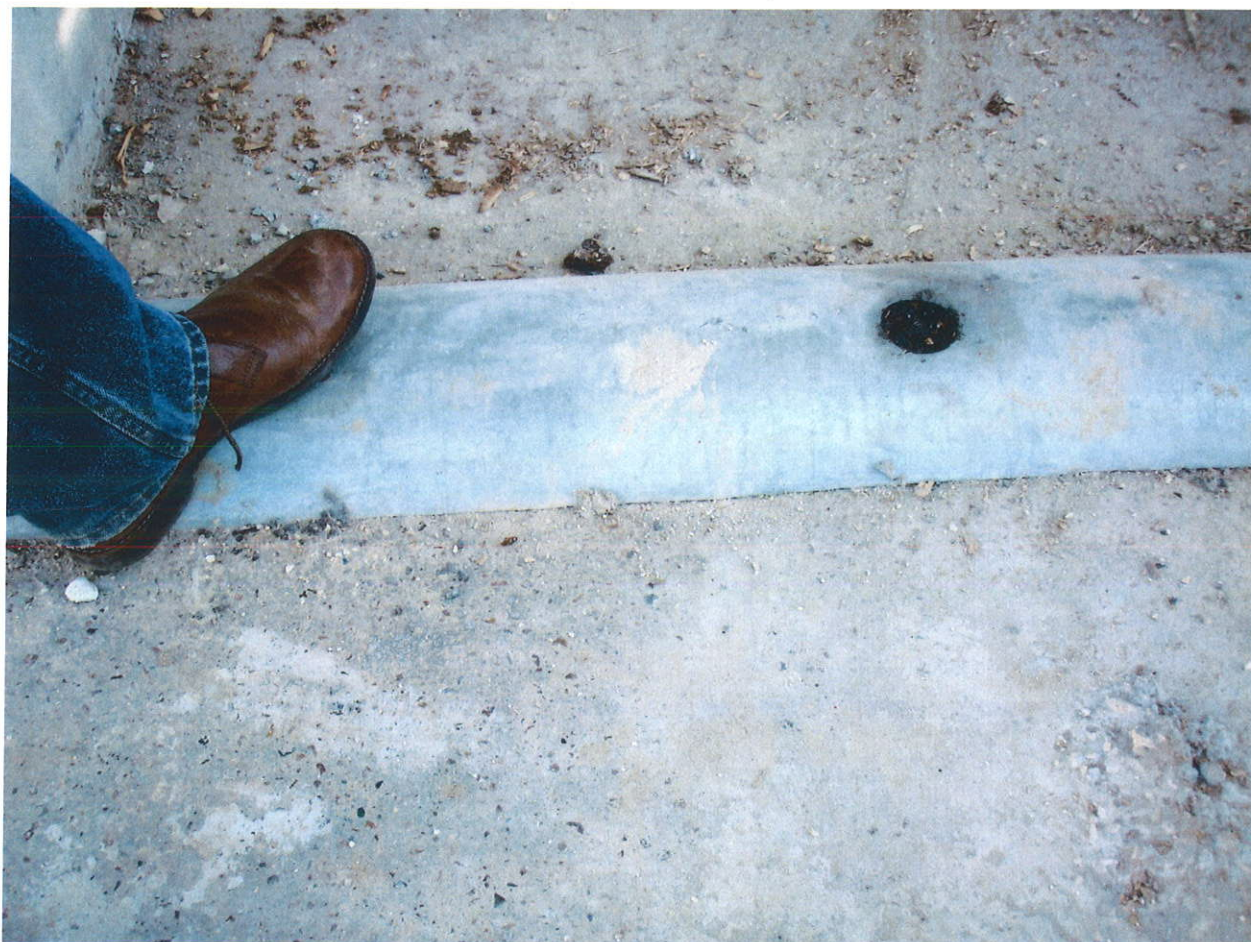


Photo File Name: P9220063

Date of Photo: 9-22-2015

Time of Photo: 1736

Photographer: Juan Ibarra

Description: A view of the metal curbing located at the entrance into each manure bin to prevent track-out.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 9

Location: Delta Downs Racetrack, Casino and Hotel		
City: Vinton	Parish: Calcasieu	State: Louisiana



Photo File Name: P9220064

Date of Photo: 9-22-2015

Time of Photo: 1738

Photographer: Juan Ibarra

Description: Another manure bin located between Barns 11 and 12. Again, the area has been kept clean.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 10

Location: Delta Downs Racetrack, Casino and Hotel		
City: Vinton	Parish: Calcasieu	State: Louisiana



Photo File Name: P9220065

Date of Photo: 9-22-2015

Time of Photo: 1749

Photographer: Juan Ibarra

Description: Looking south at the East Lagoon, and the influent line (and concrete pad) from the lift stations.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 11

Location: Delta Downs Racetrack, Casino and Hotel		
City: Vinton	Parish: Calcasieu	State: Louisiana



Photo File Name: P9220066

Date of Photo: 9-22-2015

Time of Photo: 1750

Photographer: Juan Ibarra

Description: During the inspection, the one of the lift stations began operating, and discharging into the East Lagoon.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 12

Location: Delta Downs Racetrack, Casino and Hotel		
City: Vinton	Parish: Calcasieu	State: Louisiana



Photo File Name: P9220067

Date of Photo: 9-22-2015

Time of Photo: 1757

Photographer: Juan Ibarra

Description: The East Lagoon overflow gate. The lagoon had greater than 2' of freeboard at the time of the inspection.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 13

Location: Delta Downs Racetrack, Casino and Hotel		
City: Vinton	Parish: Calcasieu	State: Louisiana



Photo File Name: P9220068

Date of Photo: 9-22-2015

Time of Photo: 1759

Photographer: Juan Ibarra

Description: The discharge line from the East Lagoon, leading to the gate shown in photo 12. The lagoon level is seen at the top right, thru the brush. This brush should be kept mowed to minimize root intrusion and perforation of the unit's embankments.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 14

Location: Delta Downs Racetrack, Casino and Hotel		
City: Vinton	Parish: Calcasieu	State: Louisiana



Photo File Name: P9220069

Date of Photo: 9-22-2015

Time of Photo: 1826

Photographer: Juan Ibarra

Description: Looking east-northeast at the West Lagoon. The unit has about 3" of freeboard, however, the facility has a collection system diversion gate that is directing wash rack water from Barns 12-22 to the East Lagoon which has sufficient freeboard capacity. Barns 1-11 go directly to the West Lagoon. The facility uses a water truck to dewater the West Lagoon. The unit must provide for a minimum of 1' of freeboard, and preferably 2' of freeboard.

Aerial of Delta Downs showing location and direction where photographs were taken

