

Region 6 - Enforcement & Compliance Assurance Division
INSPECTION REPORT

Inspection Date(s):	07/15/2021	
Media Program:	Water	
Regulatory Program(s)	CAFO	
Company Name:	Global Gaming LSP, LLC	
Facility Name:	Lone Star Park	
Facility Physical Location:	1000 Lone Star Parkway	
(city, state, zip code)	Grand Prairie, TX 75050	
Mailing address:	Same	
(city, state, zip code)	Same	
County/Parish:	Dallas	
Facility Phone Number	972-237-5157	
Facility Contact:	Kent Slabotsky	Vice President of Operations
	Kent.slabotsky@lonestarpark.com	
FRS Number:		
Identification/Permit Number:	TXG921229	
Media Identifier Number:		
NAICS:	711212	
SIC:	7948	
Personnel participating in inspection:		
Juan Ibarra	EPA / 6ECD-WA/	Inspector
David Waidler	TCEQ Region 4	Inspector
Brooke Salisbury	TCEQ Region 4	Inspector
Merlinda Gonzalez	LSP (Lone Star Park)	Director of Security
Alec Cain	LSP	EHS M
Vicki Ballard	LSP	Administrative Assistant
Greg Johnson	LSP	Chief Engineer
EPA Lead Inspector Signature/Date		
	{Inspector name}	Date
Supervisor Signature/Date		
	{Supervisor name}	Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

EPA Region 6 inspector Juan Ibarra, and Texas Commission on Environmental Quality (TCEQ) inspectors David Waidler and Brooke Salisbury, arrived at Lone Star Park horse racetrack on July 15, 2021, for an announced inspection. We met with Merlinda Gonzalez (Lone Star Park (LSP) Director of Security), Alec Cain (LSP Environmental Health and Safety Manager), Vicki Ballard (LSP Administrative Assistant), and Greg Johnson (LSP Chief Engineer) at the Opening Conference. I presented my credentials to the LSP managers and staff and informed them that this was an EPA lead inspection to determine compliance with the facility's Texas Commission on Environmental Quality (TCEQ) General Concentrated Animal Feeding Operation (CAFO) Permit and the operational requirements contained therein.

FACILITY DESCRIPTION

Lone Star Park horse racetrack opened in 1997. The track operates as a large horse CAFO and is permitted by the TCEQ CAFO General Permit (TXG921229) for a maximum capacity of 1572 horses. The facility obtained its initial permit coverage on 10/2/2011 and is currently operating under its general permit that became effective 7/20/2019.

Lone Star Park has a Thoroughbred race season that ran from April 22, 2021 thru July 11, 2021, and a Quarter Horse race season that ran from September 11, 2020 thru November 28, 2020. Horses begin coming onto the facility a week or two before the beginning of the racing season, and leave the site a week or two after the racing season ends.

The facility's production area consists of approximately 30 horse barns in which the horse wash racks are plumbed directly into the sanitary sewer. Each barn has a 30-yard roll-off dumpster with a front opening door for manure storage. During racing season, the roll-off dumpsters are picked up daily by a third party called Living Earth that takes the manure for off-site composting.

All production area storm water is captured and contained in a retention control structure called Lake 4. Lake 4 is not managed as a lagoon or a retention control structure per the requirements of the TCEQ CAFO General Permit that requires a retention control structure to be designed, constructed, operated, and maintained to contain all process-generated waste and wastewater plus runoff generated during the 25-year/24-hour storm event. Rather, Lake 4 is managed in accordance with best management practices (BMPs) described in the facility's modified/amended CAFO permit. The CAFO permit was amended to address violations described in EPA's Administrative Order (CWA-06-2013-1802) issued on 6/3/2013. The violations alleged in the AO include (1) failure to ensure that the required capacity in the Lake 4 RCS was available to contain runoff from a 25-year, 24-hour storm event, and (2) failure to document that Lake 4 was properly designed and constructed or provides protection equivalent to the requirements of the permit. The facility agreed to address the alleged violations by signing Administrative Order on Consent (AOC) issued by EPA (CWA-06-2014-1756) on 2/7/2014. The AOC

required LSP to submit to TCEQ a notice-of-change (NOC) requesting a permit modification to include, in the modified/amended permit, the Lake 4 BMPs specified in the AOC. The facility submitted the NOC to the TCEQ on 1/7/2014 requesting an amendment/modification of its permit to include BMPs for managing Lake 4. The modified permit requires LSP to (1) maintain the water level to minimize discharges during normal weather conditions, and (2) collect semi-annual water samples from Lake 4 and have the samples analyzed for parameters required by the City of Grand Prairie.

Lake 4 is equipped with four pumps. One pump is used to maintain pressure and the other three are used to operate the irrigation system at the track or to fill the water truck that applies effluent to the dirt track. Lake 4 also utilizes a ground water well to help supplement the water needed for irrigation, and the facility also purchases City of Grand Prairie drinking water to also help fill Lake 4.

Lakes 2 and 3 are located within the racetrack infield area. These drain into Lake 4 if they were to overflow. Lake 4 in turn would discharge from the southwest corner of the unit into Lake 5 which is located approximately 0.18 miles southeast of Lake 4 (linear distance). The discharge from Lake 4 would travel thru man-made ditches into Lake 5. Lake 5 has flood control gates which are managed and operated by the Grand Prairie Metropolitan Utility Reclamation District (GPMURD) which would allow water to be discharged thru the levee into a tributary of the West Fork of the Trinity River.

Section II - OBSERVATIONS

During the Lone Star Park site inspection, I observed that Lake 4 only had about six inches of freeboard and that there was no marker available to document the Lake level. The facility was also required to sample Lake 4 twice each year for nutrients and other conventional parameters per the requirements of the modified/amended CAFO permit but had not done so since 2012. I also noted that Lake 4 did not have any duck weed or filamentous algae, and it appeared to look like it had much suspended algae (see Photos 1-2).

Manure roll-off dumpsters (30-yard) were not being properly managed to control the spillage of the manure/waste bedding materials onto the ground which would then contaminate storm water runoff from the production area, or to provide adequate and frequent enough clean-up of spillage around the manure roll-off dumpsters. An additional requirement of the modified/amended CAFO permit is to keep the manure dumpsters covered. This was not being done as well (see Photos 3-4).

Lone Star Park must manage the street sweeper's operation to minimize the amount of sand and other materials on the paved areas (Photos 3 and 4) to prevent their discharge into the pavement storm drainage system that leads into Lake 4. This is also a requirement of the modified/amended CAFO permit.

The amount of sediment and other solids that have accumulated within Lake 4 since its construction approximately 25 years ago must be assessed to determine how much material has accumulated and when and how much sediment must be removed to re-establish Lake 4 retention capacity.

Section III – AREAS OF CONCERN

- 1) The water level in Lake 4 must be managed to “minimize discharges during normal weather conditions” into the downstream Lake 5 per the requirements of the amended/modified CAFO permit. As such, the facility must manage the water level by use of a pole marker, and maintenance of an adequate freeboard and documentation of the water level must also be kept.
- 2) Lone Star Park must implement the twice annual water sampling required for Lake 4 per the requirements of the amended/modified CAFO permit.
- 3) The manure roll-off dumpsters must be managed and maintained to prevent the spillage of manure onto the ground around the units by enforcing the BMPs that ensure that housekeeping measures are being implemented to address and document spillage. Additionally, the manure dumpsters are supposed to be kept covered, and none of them were seen to be covered.
- 4) The street sweeper must be operated at a frequency that will minimize the amount of sand and other materials on the paved areas to prevent their discharge during storm events into the pavement storm drainage system that leads into Lake 4.

EPA Region 6 inspector Juan Ibarra conducted a closing conference with the TCEQ inspectors and the Lone Star Park staff that attended the Opening Conference and site visit. At that time, I reviewed the Areas of Concern related to the required management of Lake 4 and the lack of proper manure management around the dumpsters and manure spillage around these units.

Section IV – FOLLOW UP

None

Section V – LIST OF APPENDICES

Appendix 1 – Photo Log – 4 photos taken on 7/15/2021