



**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**

*We Protect Hoosiers and Our Environment.*

100 N. Senate Avenue • Indianapolis, IN 46204  
(800) 451-6027 • (317) 232-8603 • [www.idem.IN.gov](http://www.idem.IN.gov)

**Eric J. Holcomb**  
Governor

**Brian C. Rockensuess**  
Commissioner

September 18, 2024

**VIA Mail**

Mr. Rick More  
Harrah's Hoosier Park Racing & Casino  
4500 Dan Patch Circle  
Anderson, Indiana 46013

Re: **Inspection Summary Letter**  
Hoosier Park, LLC.  
Farm ID # 6309  
Anderson, Madison County

Dear Mr. Moore:

On September 17, 2024, representatives of the Indiana Department of Environmental Management, Office of Land Quality, conducted an inspection of the above-referenced facility. This inspection was conducted pursuant to IC 13-14-2-2. For your information, and in accordance with IC 13-14-5, a summary of the inspection is provided below:

Type of Inspection:	Follow-up
Results of Inspection:	No violations were observed (see attached inspection report).

Please direct any response to this letter and any questions to me Matt Brown (317) 727-6911 or [Mbrown@idem.IN.gov](mailto:Mbrown@idem.IN.gov). Thank you for your attention to this matter.

Sincerely,

Charles P. Grady, Section Chief  
Confined Feeding Operation Compliance  
Office of Land Quality

Enclosure

cc: Madison County Health Department  
cc: Scott Kreuzman [scott@kreuzmanconsulting.com](mailto:scott@kreuzmanconsulting.com)





**CFO**  
**INSPECTION REPORT**  
 INDIANA DEPARTMENT OF  
 ENVIRONMENTAL MANAGEMENT

Inspector's Name:	Matt Brown	
Others Present	Andrew Paxton	Backside operations Mgr.
Date:	9/17/2024	
Time In:	8:45 AM	
Time Out:	9:15 AM	

**General Information**

**Inspection Type**

Inspection Type: CFO- Follow-up

**Facility Information**

Facility Name: Hoosier Park, LLC. Harrah's Hoosier Park Racing & Casino

Facility Location:  
 Street Address: 4500 Dan Patch Circle  
 City: Anderson  
 State: IN  
 Zip Code: 46013  
 County: Madison

Facility Mailing Information:  
 Mailing Address: 4500 Dan Patch Circle  
 Mailing City: Anderson  
 Mailing State: 46013  
 Mailing Zip Code: Madison

Facility Contact Information:  
 Contact Person: Rick Moore  
 Contacts Phone Number: 765-609-4831

Owner Contact Information  
 Owner Name: Hoosier Park, LLC.  
 Owner Phone Number: 765-609-4831

**Facility ID**

Log Number: 6309

**Animal Types**

Animals Present: Horses

**Manure Management Systems**

Type of Manure Management System: Dry Manure Storage Shed

**Approved Structures**

Number of Permitted Structures: 54

Number of Observed Structures: 54

**Outstanding Issues**

Last Inspection Date: 08/28/2024

Previous Violation(s):  Yes  No

**Discharge and Spill Requirements**

**Unpermitted Discharge**

IC 13-30-2-1: A person may not do any of the following: (1) Discharge, emit, cause, allow, or threaten to discharge, emit, cause, or allow any contaminant or waste, including any noxious odor, either alone or in combination with contaminants from other sources, into: (A) the environment (B) any publicly owned treatment works; in any form that causes or would cause pollution that violates or would violate rules, standards, or discharge or emission requirements adopted by the appropriate board under the environmental manager laws (2) Increase the quantity or strength of a discharge of contaminants into the waters of Indiana without prior approval of the department. (3) Deposit any contaminants upon the land in a place and manner that creates or would create a pollution hazard that violates or would violate a rule adopted by one (1) of the boards.... (7) Construct, install, operate, conduct, or modify, without prior approval of the department, any equipment or facility of any type that may: (A) cause or contribute to pollution; or (B) be designed to prevent pollution.

**Violation Detail(s):** All process wastewater must be captured and/or prevented from running off-site

**Required Action:** Cease any discharge not covered by a permit.

Field verified corrected (9-17-2024)

### Checklist

#### Discharge and Spill Requirements

- Unpermitted Discharge
- Spill Not Reported
- Spills Not Managed

#### Approval and Performance Standards

- No Valid Approval
- Approval Condition
- Access Denied

#### Operational Standards

- Maintenance and Operation
- Improper Freeboard
- Markers Not Maintained
- Unapproved Manure Storage
- Self Monitoring
- Earthen Berm Not Maintained
- Removal of Accumulated Solids
- Vegetation Management System
- Feedlot Run-Off
- Transport & Handling
- Mortality Management

#### Manure Application Activities

- Staging
- Run-Off
- Ponding
- Spray Irrigation Operation
- Transport and Handling
- Emergency Application, Snow and Frozen Ground
- Manure Applied from Roadway
- Manure Applied to Erodible Soils
- Manure Applied to Saturated Soils

#### Operating Record

- Requirements
- Farmstead Plan
- Manure Management Plan
- Ground Water Monitoring
- Storm Water Pollution Prevention Plan Certification
- Certification by a Registered Professional Engineer
- Construction Requirements
- Self Monitoring Records
- Emergency Response Plan
- Land Use Agreements
- Justification of Nitrogen Losses
- Land Application Records for 5 Years
- Emergency Land Application of Manure
- Spill Documentation
- Spray Irrigation Plan
- Land Application Monitoring Activities
- Marketing and Distribution Records for 5 Years
- Maintenance Activities on Liquid Manure Storage Facilities
- Setback Waivers
- Approvals

#### Land Application Records

- Required Acreage for Manure Application
- Manure and Soil Testing
- Apply at Agronomic Rate
- Land Application Records
- Marketing & Distribution
- Information Sheets

#### Storm Water Management

- Applicability
- Storm Water Management

#### Exiting Program

- Decommissioning Storage Facility
- Exiting the Program Requirements
- Closing the Operation

### General Comments

Today, a follow-up inspection was conducted at the Harrah's Hoosier Park facility. Previously, a complaint inspection was conducted on 8-27-2024. During that inspection, wash water was observed migrating out of permitted structures into the stormwater drain. This follow-up specifically looked at these structures to ensure they have stopped the unpermitted discharge.

Once on-site, I met with Andrew Paxton, backside manager. After a brief overview, a site tour was conducted. We looked at both wash stations. Previously, these wash stations had evidence of wash water/process wastewater migrating out of the bounds of their permitted structures. Mr. Paxton and I discussed the increased frequency of pumping and temporary changes that they have tried implementing. More permanent solutions may be required to ensure the wash water does not come out of the containment system. These solutions are going to be discussed with their consultant on Friday, September

20th. Once a plan has been developed, modifications will be submitted to IDEM's CFO/CAFO permitting section for their review. Please continue to manage these structures as required to prevent any unpermitted discharge.

### Description of Violations and Further Actions

The findings noted in this report do not include a compliance evaluation for the submittal of required construction notifications, construction affidavits, facility change notifications, as-built plans, waste storage structure closures, and special compliance monitoring reports or data.

#### Inspection Documentation

Photograph's Taken	<input checked="" type="radio"/> Yes <input type="radio"/> No
Map(s)	<input type="radio"/> Yes <input checked="" type="radio"/> No
GPS Location Collected	<input type="radio"/> Yes <input checked="" type="radio"/> No
Field Screening Conducted	<input type="radio"/> Yes <input checked="" type="radio"/> No
Lab Sample	<input type="radio"/> Yes <input checked="" type="radio"/> No

#### Inspection Results/Actions

Bio-Security	IDEM Bio-Security Policy Level 2 observed during time of inspection.
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#### Finalize Inspection

Written Summary of Inspection

Inspector Information	Inspector:	Matt Brown
	Phone Number:	(317) 727-6911
	Email Address:	mbrown@idem.in.gov



**Facility Name**

Harrah's Hoosier Park FID 6309

**Photographer**

Matt Brown

**Date/Time**

9/17/2024; 8:49 AM

**Others Present**

Andrew Paxton

**Description**

This photo displays there is no wash water entering the stormwater drain.



**Facility Name**

Harrah's Hoosier Park FID 6309

**Photographer**

Matt Brown

**Date/Time**

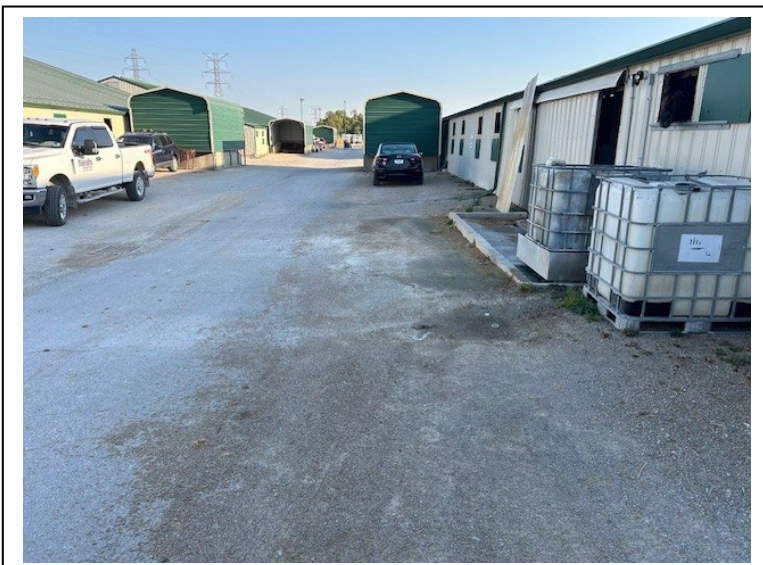
9/17/2024; 8:49 AM

**Others Present**

Andrew Paxton

**Description**

This photo displays the wash station. A temporary flap has been added to help direct water on the back side of the container.



**Facility Name**

Harrah's Hoosier Park FID 6309

**Photographer**

Matt Brown

**Date/Time**

9/17/2024; 8:51 AM

**Others Present**

Andrew Paxton

**Description**

This photo displays the second wash station. No wash water is entering the storm drain. A temporary flap has been added to help direct water on the back side of the container.

