

**From:** [Randy Ammons](#)  
**To:** [REDACTED]  
**Cc:** [OCE](#)  
**Subject:** RE: RaceTrac Petroleum UST Testing and Inspection Enforcement Discretion  
**Date:** Sunday, April 5, 2020 2:28:36 PM

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Good afternoon Mr. Woodfin.

This is in response to your request dated April 2, 2020, requesting enforcement discretion for 90 days for the following to eliminate the onsite presence of testing/inspection vendors during the COVID-19 pandemic:

1. Leak detection system (ATG) certification, line tightness testing, leak detector certification, impact valve inspections, pressure decay testing, vent cap testing and containment sump testing.
2. Spill bucket and containment sump inspections

The TCEQ is exercising enforcement discretion on a case by case base for regulated entities due to the COVID-19 pandemic. This correspondence will serve as approval of enforcement discretion for 60 days for the above referenced testing and inspections through June 2, 2020. During this time, RaceTrac will continue to monitor and maintain monthly release detection compliance on fuel systems as well as take equipment out of service if issues are identified. If at the end of the 60 days, discretion is still needed, please resubmit your request. In your request, we ask that you be specific in the rule citation for which you are requesting enforcement discretion.

The TCEQ will revisit this issue at the appropriate time and reserves the right to withdraw this approval.

Regards,

Randy J. Ammons, Area Director  
North Central and West Texas Area  
Texas Commission on Environmental Quality

**From:** [Jordan Woodfin](#)  
**To:** [OCE](#); [Ramiro Garcia](#)  
**Subject:** RaceTrac Petroleum UST Testing and Inspection Enforcement Discretion  
**Date:** Thursday, April 2, 2020 1:15:17 PM  
**Attachments:** [RaecTrac Texas Upcoming Testing.xlsx](#)

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Good Afternoon,

As an essential business that is critical to the energy sector of the American infrastructure, RaceTrac Petroleum is taking all steps to protect the health and safety of its customers, employees, and vendors. Our goal is to provide uninterrupted service to the local communities in this unprecedented time in world history. With that said, RaceTrac Petroleum is requesting enforcement discretion for UST compliance testing and reoccurring inspections for the next 90 days due to the COVID-19 pandemic. During this time, RaceTrac will still monitor and maintain monthly release detection compliance on our fuel systems as well as taking equipment out of service if issues are identified.

By delaying testing and inspections for this brief time, it will eliminate the onsite presence of testing/inspection vendors that would not have otherwise been at the store. This will reduce the potential opportunities of spreading COVID-19 to customers or store employees. This will also reduce the potential opportunities of spreading COVID-19 to testing and inspection vendors who routinely travel from other areas of the state performing their job responsibilities. Another key factor in this request is eliminating the fuel system downtime that ranges between 4-5 hours for UST compliance testing. To provide the most support to local communities and essential personnel like law enforcement and healthcare worker in this overwhelming time, we want to ensure that our fuel systems are available to these essential people by delaying testing/inspections and the downtime that accompanies.

A list of thirty (30) stores is attached that has compliance testing dates in the next 60 days and all of our stores will experience one or more reoccurring inspections in the next 60 days. Our request enforcement discretion that would allow us to delay testing and inspections for the next 90 days while maintaining all other forms of release detection compliance.

Thanks you for your consideration in this matter and I look forward to speaking to you soon.

**Jordan Woodfin** | Compliance Manager | Environmental

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o 770-431-7600 x 4068 | c 575-318-6198 | Group Email: [EnvironmentalCompliance@racetrac.com](mailto:EnvironmentalCompliance@racetrac.com)

FacilityName	Facility Number	Address	City	State	Zip
0073 - Lone Star	78395	1525 N. Belt Line Rd.	Grand Prairie	TX	75050
0231 - MacArthur	83920	801 W. Royal Lane	Irving	TX	75039
0236 - Stacy	85090	840 W. Stacy Road	Allen	TX	75013
0320 - Pioneer Pkwy	38169	2333 E. Pioneer Pkwy.	Arlington	TX	76010
0437 - Garland	60083	2018 Northwest Hwy.	Garland	TX	75041
0473 - Alta Mere	66034	3204 Altamere Drive	Fort Worth	TX	76116
0478 - Forest Lane	66028	8124 Forest Lane	Dallas	TX	75243
0536 - North Richland Hills	73855	8601 Grapevine Hwy.	N. Richland Hills	TX	76180
564 - Waxahachie	70081	1110 Hwy. 77 North	Waxahachie	TX	75165
572 - Tarrant Parkway	83916	5151 N. Tarrant Pkwy.	Fort Worth	TX	76244
598 - Wylie	85151	801 S.H. 78 N.	Wiley	TX	75098
634 - Duncanville	85228	519 S. Cockrell Hill Road	Duncanville	TX	75098
725 - Gross Road	46402	1015 Gross Road	Mesquite	TX	75149
967 - Jim Miller	38166	8130 E. RL Thornton Expy.	Dallas	TX	75288
2304 - Melissa	85084	1100 Sam Rayburn Hwy.	Melissa	TX	75454
2308 - Conflans	89005	714 N. Beltline Rd	Irving	TX	75038
2336 - Shiloh	86487	10707 Ferguson Road	Dallas	TX	75228
2337 - Community	86486	2807 West Northwest Hwy	Dallas	TX	75220-6215
2346 - Lewisville	89574	640 W. FM 3040	Lewisville	TX	75067
2371 - Parkwood	87298	5700 State Highway 121	Plano	TX	75024
2377 - Cleburne	87067	2236 N. Main St.,	Cleburne	TX	76031
2382 - Lebanon and Parkwood	88457	7940 Lebanon Rd	Frisco	TX	75034
2420 - Midway	89457	2550 Midway Road	Carrollton	TX	75006
2429 - Carbon	88876	3510 Carbon Rd	Irving	TX	75038
2445 - Western Turbo	88912	2921 Western Center Blvd	Fort Worth	TX	76131
2446 - Wesley	88861	6901 Wesley St	Greenville	TX	75402-7376
6762 - Nederland	67121	3220 Hwy. 365	Nederland	TX	77627
6779 - Beaumont	69309	4205 College Street	Beaumont	TX	77701