

CHRONOLOGY OF SITE ACTIVITIES AT FORMER EXXON TANK FARM

<i>Completion Date</i>	<i>Description of Activities Conducted</i>
04/15/1994	On behalf of Exxon Pipeline, KEI conducted an initial soil investigation. Exxon Pipeline had begun decommissioning the facility. Soil samples were collected on a 100' grid and submitted for analyses based on visual observations. The activity was summarized in the report titled <i>EPC Harbor Island Station Environmental Investigation</i> .
06/08/1994	On behalf of Exxon Pipeline, KEI prepared and submitted a remedial work plan for RRC approval.
07/15/1994	RRC approved the work plan with modifications.
10/19/1994	RRC issued a No Further Action Letter to Exxon Pipeline for soil assessment activities related to 1,1,2-trichloroethane (TCE) release.
08/16/1995	On behalf of Exxon Pipeline, KEI conducted soil remediation activities. Areas exceeding 10% Total Petroleum Hydrocarbons (TPH) were excavated and treated onsite. Areas between 5% and 10% TPH were remediated in place. The activity was summarized in the report titled <i>Soil Remediation Report</i> .
4/9/1996	PCCA purchases the Former Exxon Tank Farm property from Koch Pipeline.
07/29/1996	On behalf of PCCA for purchase of the property, Flour Daniels conducted verification sampling on areas exceeding 2% TPH to determine the effectiveness of the remediation activities and to establish an environmental baseline. The activity was summarized in the report titled <i>Verification Sampling Report</i> .
01/26/1998	On behalf of Exxon Pipeline, KEI conducted additional remediation activities in the area identified as Area 10. The activity was summarized in the report titled <i>Area 10 Remediation</i> .
06/22/1998	On behalf of PCCA, APT conducted soil sampling to verify the remediation efforts and remediation to 1% TPH cleanup level. The activity was summarized in the report titled <i>Confirmation Sampling Investigation</i> .
07/07/1999	On behalf of Exxon Pipeline, KEI conducted verification soil borings and then summarized site activities in a <i>Closure Report</i> and submitted it to the RRC.
07/17/1999	On behalf of Exxon Pipeline, KEI conducted additional remediation in those areas exceeding 2% TPH. The activity was summarized in the report titled <i>Additional Areas Remediation</i> .
11/9/1999	RRC issued a No Further Action Letter for soil assessment and product recovery activities that had occurred at the site but indicated an exclusion for the tank bottom areas that could not be assessed during the site activities.
3/12/2002	PCCA contracted J&J Insulation and Southern Ecology Management to remove asbestos from Former Exxon Buildings 3815, 4269, 4270, 4286, 4289, and 4290. The activities are summarized in the <i>Asbestos Abatement Report</i> .
8/14/2002	PCCA contracted Envirotest to conduct a asbestos survey of the remaining structures on Harbor Island. Asbestos was found in several of the structures. The activities are summarized in the <i>Limited Asbestos Sampling</i> report.

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9/27/2002	PCCA contracted Southern Ecology Management to conduct a survey of the Former Exxon Tank Farm site to determine PCB content of remaining transformers. Transformers with PCB's were drained, removed and properly disposed of. The activities are summarized in the <i>Transformer Abatement Report</i> .
05/08/2003	PCCA contracted American Demolition to demolish the crude oil tanks.
09/05/2003	PCCA and ExxonMobil Pipeline Company entered into a Site Remediation Agreement which designated responsibilities for cleanup and a cleanup level of 1% TPH for the site.
9/8/2003	PCCA contracted ERM to conduct a survey of the septic tanks remaining on site at Harbor Island. The results are summarized in the <i>Harbor Island Tank Assessment: Septic</i> report.
11/19/2003	PCCA contracted Bexar Environmental to remove asbestos from remaining structures on Harbor Island. The activities are summarized in the <i>Asbestos Air Monitoring Report</i> and the <i>Asbestos Abatement Closeout</i> .
12/22/2003	On behalf of PCCA, Rosengarten, Smith and Associates conducted confirmation sampling in tank farm areas and previously remediated areas exceeding 1% TPH. The activities were summarized in a report titled <i>Soil Sampling Report for Former Exxon Tank Farm</i> .
02/29/2004	Pipeline Equities entered into a Surplus Sale Agreement with PCCA for removal of the piping at the site. PCCA contracted Ms. Rhoni Lahn to be onsite and oversee the removal activities. During this time PCCA identified areas of pre-existing contamination in accordance with the Site Remediation Agreement. Pipeline Equities did not complete the work and PCCA put out a contract to complete the removal activities.
3/2004	PCCA entered into a lease option agreement with Zachary for part of the Harbor Island site. Entrix was contracted by Zachary to conduct a wetland determination. The results of the activities are summarized in <i>Wetland Assessment and Delineation PCCA-Zachary Property</i> .
7/29/2004	Zachary contracted with ENSR to conduct an environmental investigation of the Harbor Island property to determine the extent of soil contamination within the proposed project area. Soil borings and monitor wells were installed. Soil and groundwater data summary tables were provided.
11/11/2004	International Divers was contracted by PCCA to remove the remaining pipe from the site and septic tanks and associated structures. PCCA again contracted Ms. Rhoni Lahn to be onsite and oversee the removal activities. Areas of pre-existing contamination were also identified in accordance with the Site Remediation Agreement. The areas of pre-existing contamination were summarized in a final report to Exxon titled <i>Hydrocarbon Contamination Report for Former Exxon Tank Farm</i> .
03/04/2005	On behalf of ExxonMobil, CRA submitted a Soil Remediation Workplan for approval to the RRC.
03/08/2005	RRC submits letter to ExxonMobil in response to Soil Remediation Workplan requesting additional information.

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03/17/2005	On behalf of ExxonMobil, CRA submitted a response to RRC letter dated 03/08/2005 concerning the Soil Remediation Workplan requesting additional information.
03/22/2005	PCCA submitted a correction to the Hydrocarbon Contamination Report for Former Exxon Tank Farm that inaccurately stated that the pipe removal activities were completed.
07/05/2005	On behalf of ExxonMobil, CRA began investigation and remediation of the areas of pre-existing contamination identified during the tank demolition and pipeline removal activities. Areas were excavated based on visual observations and landfarmed onsite. Confirmation sampling was conducted to verify remediation to 1% TPH. The areas not remediated were sampled to identify if the remaining areas exceeded 1% TPH.
08/23/2005	CRA was contracted by PCCA to complete pipe removal activities and trench the site to identify and remove pipe in unmapped locations. PCCA again contracted Ms. Rhoni Lahn to be onsite and oversee the removal activities. Areas of pre-existing contamination were also identified in accordance with the Site Remediation Agreement. The areas of pre-existing contamination were summarized in a final report to Exxon titled <i>Second Hydrocarbon Contamination Report for Former Exxon Tank Farm</i> .
01/10/2007	CRA was contracted by ExxonMobil to conduct sampling of the pre-existing contamination locations identified in the <i>Second Hydrocarbon Contamination Report for Former Exxon Tank Farm</i> . Sampling consisted of an excavation at the center point and radial trenching in four directions to determine the visual extent of the contamination. Soil samples were submitted for confirmation. PCCA contracted Ms. Rhoni Lahn to represent PCCA during the activities and collect duplicate samples.
08/24/2007	PCCA summarized the results of the duplicate sampling and compared them to the results from the samples collected by CRA. Additionally, PCCA pointed out concerns with assessment strategies and assumptions made by CRA and ExxonMobil. The results were summarized in a letter report "Site Assessment Results for PCCA Harbor Island".
12/07/2007	CRA submitted to RRC a summary of the site activities including remediation and sampling activities conducted at the site from 2005 through 2007. The results were summarized in a report titled <i>Additional Soil Delineation Report</i> .
12/20/2007	RRC requested additional historical information on the site from ExxonMobil.
01/11/2008	On behalf of ExxonMobil, CRA submitted additional historical information to RRC regarding cleanup and site investigation activities at the site.
03/04/2008	On behalf of ExxonMobil, CRA submitted response to RRC letter dated 12/21/2007 with Soil Remediation Work Plan included.

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04/02/2008	RRC provided comments on review of Soil Remediation Work Plan including requests for confirmation soil samples in native soils below landfarming area, evaluating BTEX in groundwater samples in excavations, further evaluating groundwater by installing groundwater wells, and providing a schedule and time line of proposed field activities.
02/23/2009	On behalf of ExxonMobil, CRA started onsite work to prepare the site for landfarming activities per the RRC approved work plan. PCCA and ExxonMobil entered into an agreement to also have CRA conduct the remediation for the areas that PCCA was responsible for at the end of the project.
03/10/2009	CRA began excavation and landfarming activities at the site in the areas previously identified as contaminated.
09/24/2009	CRA completed soil remediation of the areas that ExxonMobil was responsible and PCCA was notified that CRA did not have enough personnel to continue work at the site to address PCCA areas of responsibility.
9/4/2009	PCCA contracted GAINCO to install delineation soil borings in the area of the Former Texas Treasure parking lot fence line to determine the extent of soil contamination under the Former Texas Treasure parking lot and in Areas 109 and 106. The results were summarized in a report titled <i>Geoprobe Delineation Report - Preliminary</i> .
9/30/2009	PCCA contracted GAINCO to install additional delineation soil borings across the Former Texas Treasure parking lot.
10/14/2009	PCCA contracted GAINCO to conduct soil remediation of the areas of PCCA responsibility, remove debris from the site, and remove remaining buried pipelines identified during previous remediation efforts.
12/21/2009	PCCA terminated soil remediation activities and site restoration activities at the site due to heavy rains and flooding. Work will commence in spring 2010 when site has dried up.
04/29/2010	PCCA contracted GAINCO to install additional delineation soil borings in the areas in the Former Texas Treasure parking lot.
05/20/2010	PCCA contracted GAINCO to complete remediation of the remaining areas at the site.
06/25/2010	GAINCO completed remediation and site restoration activities at the site.
12/13/2010	PCCA contracted GAINCO to collect additional soil samples at the site to close data gaps in the remediation activities conducted at the site.
2/16/2011	PCCA submits <i>Environmental Activities Report for Former Exxon Pipeline – Harbor Island Station</i> to RRC and ExxonMobil documenting the remediation and soil boring activities conducted by PCCA at Harbor Island.
4/27/2011	CRA, on behalf of ExxonMobil, submitted <i>Groundwater Assessment Work Plan</i> to the RRC for approval of the locations of the monitor wells at the site.
9/19/2011	CRA contracted by ExxonMobil to install groundwater monitoring wells at the site and collect groundwater samples.

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7/3/2012	CRA, on behalf of ExxonMobil, submitted <i>2011 Well Installation and Quarterly Groundwater Monitoring and Sampling Report</i> to the RRC documenting well installation and sampling activities.
11/12/2012	CRA, on behalf of ExxonMobil, submitted to RRC a <i>Remediation Summary Report</i> summarizing the results of remediation conducted to date.
10/23/2013	CRA, on behalf of ExxonMobil, submitted to RRC a <i>Harbor Island Closure Report</i> including recommendations for implementation of a Restrictive Covenant.
1/5/2015	No Further Action Letter received by ExxonMobil from the RRC.
2/5/2019	PCCA notified RRC regarding discovered hydrocarbon spill along the shoreline of former Exxon Mobile property, and suspected hydrocarbon contamination discovered near the shoreline of former Atofina property and informed of PCCA's plans to assess each location.
3/20/2019	PCCA apprised RRC of plans to include assessment of the 6 deed recorded areas on the former Exxon Mobile property since obstructions had been removed which had previously prevented assessment.
9/3/2019	PCCA notified RRC of plans to have contractors collect soil samples from 6 deed recorded locations to assess current concentrations of TPH.
9/6/2019, 9/10-9/11/2019	Soil sampling activities associated with assessment of the 6 deed recorded areas. RRC Representative on-site to witness sampling.
10/1/2019	Meeting at RRC Headquarters with PCCA discussing plans to relocate and landfarm those portions of deed recorded soils that were still above the RRC TPH allowable limit of 10,000 mg/Kg, and PCCA's plans to relocate all other unsaturated soils from within the proposed berths footprint to another location on-site.
10/3/2019	PCCA provides land treatment application information and requesting submittal of a land treatment application and sampling/closure plan.
1/23/2020	SQ Environmental, LLC <i>Application for Permit for Private Land Treatment Facility Work Plan for Soil Relocation</i> on behalf of PCCA. The submittal included as an attachment, the Soil Assessment Letter Report dated 10/16/2019 which had previously been presented to PCCA and contained soil analytical results and recommendations regarding the 6 deed recorded areas sampled in September 2019
2/18/2020	PCCA received a letter from RRC stating that the <i>Application for Permit for Private Land Treatment Facility</i> is administratively denied and listing information necessary to administratively complete the application
2/21/2020	Copy of the <i>Soil Relocation Plan and attached Soil Assessment Report</i> dated January 23, 2020 submitted to RRC by SQ Environmental on behalf of PCCA.
2/25/2020	Soil sampling conducted by SQ Environmental at shoreline spill location and suspect hydrocarbon contamination locations which had been discovered in February 2019. RRC on site to witness the sampling

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	Response Letter submitted to RRC by SQ Environmental on behalf PCCA. The letter responded to the RRC letter dated 2/18/2020 which administratively denied the <i>Application for Permit for Private Land Treatment Facility</i> submitted on 1/23/2020.
3/27/2020	Letter and Map to supplement 3/18/2020 Response Letter. Letter was drafted and emailed to RRC by SQ Environmental on behalf of PCCA
4/6/2020	<i>Harbor Island Shoreline Investigation Letter Report</i> emailed RRC by SQ Environmental on behalf of PCCA.
4/8/2020	RRC Approval of <i>Relocation Plan Land Treatment Permit Application and issuance of Land farm Permit No. LF-0403</i> .
10/5/2020	PCCA sent 10-Day Notification Letter regarding planned excavation of soil above regulated limits in deed recorded areas, sent to RRC
10/5/2020	PCCA sent 10 Day Notification Letter sent to TCEQ VCP Section regarding planned excavation of soil above regulated limits in area of shoreline investigation.
11/2-11/20/2020	Excavation of above regulated limit soil from deed restricted areas shoreline investigation location. Soil hauled to US Ecology Texas, Inc. facility in Robstown, Tx.
5/12/2021	PCCA sent the <i>Harbor Island Shoreline Excavation Report</i> to TCEQ
5/14/2021	PCCA received an email from TCEQ concurring that no further action is required for the shoreline investigation area.
10/21/2022	PCCA Submitted the <i>Harbor Island Excavation Report</i> , including an attached <i>Excavation Water Management Plan</i> to RRC
11/2/2021	Meeting between PCCA, SQ Environmental and RRC to discuss 2019 soil re-assessment, 2020 removal and disposal off-site of soil with TPH above the site-specific Tier 1 TPH mixture PCL of 10,000 mg/kg, and the <i>Excavation Water Management Plan</i> .
12/21/2021	Meeting between PCCA, SQ Environmental and RRC. RRC requested the <i>Harbor Island Excavation Report</i> be revised with additional clarifying language.
5/26/2022	PCCA sent updated <i>Harbor Island Soil Excavation Report</i> to RRC
7/25/2022	PCCA sent updated <i>Harbor Island Soil Excavation Report</i> submitted to Railroad Commission, containing additional revisions requested by RRC.
8/3/2022	RRC sent a letter to PCCA which concurred with the <i>Soil Removal Report</i> conclusions that prior restrictive covenant prohibiting residential land use is no longer necessary and that use restrictions should be placed on groundwater as recommended in the report. Upon execution of the finalized restrictive covenant with landowner, and RRC and upon receipt of proof of filing, RRC will issue an amended NFA letter to ExxonMobil and PCCA.