

2022 Environmental Cost Account (ECA) Budget Forecast for the Former Kerr-McGee/Triple S Refining Terminal #1 in Corpus Christi, Texas

Greenfield Environmental Multistate Trust LLC,

Date Submitted: 09/08/22

Trustee of Multistate Environmental Response Trust (Multistate Trust)

Date Approved: 09/12/22

Submission to: Texas Commission on Environmental Quality on September 8, 2022

Summary of Site Work Completed in 2021 and Planned for 2022:

Work Completed in 2021: Submitted Response Action Completion Report (RACR) to TCEQ in accordance with the Texas Risk Reduction Program (TRRP) reporting requirements. Performed various activities to achieve regulatory closure (e.g., decommissioned the on-site soil vapor extraction system, disposed of associated underground piping, abandoned on- and off-site groundwater monitoring wells, and filed deed notice to prohibit residential land use and the installation of water wells at the site). On June 21, 2021, based on the TCEQ review of the RACR, Texas Risk Reduction Program (TRRP) Remedy Standard A Commercial/Industrial Protective Concentration Levels (PCLs) have been achieved such that no post-response action care is required. After reviewing the proof of filing of institutional controls, the TCEQ concurred that the institutional control requirements of 30 Texas Administrative Code (TAC) §350.111 have been completed, therefore, no further action is required.

Work Planned for 2022: The work planned for 2022 includes coordination of Site access and oversight of a prospective purchaser's intrusive due diligence activities, including a sub-surface soil-vapor survey investigation and reporting activities and integration of the cleanup plan with future reuses of the Site. The work planned also includes engagement in communications with the relevant parties, including TCEQ.

Site Name: Former Kerr-McGee/Triple S Refining Terminal #1 in Corpus Christi, Texas (the Site)

Site Location: Corpus Christi, Texas

Multistate Trust Site Code: XXIX

Cost Center	Cost Center Description	Total 2021 Approved Budget	Project Costs incurred in 2021	2022 Budget	2022 Scope of Work
XXIX.A	Regulatory Compliance and Site Operations/Maintenance	\$17,000	\$919	\$0	Not Applicable: Budget assumes no regulatory compliance, site operations and maintenance costs in 2022.
XXIX.C	New Environmental Actions	\$76,000	\$58,128	\$9,000	Budget includes costs for the Multistate Trust's third-party contractor to oversee the prospective purchaser's on-site sub-surface soil vapor survey investigation and reporting activities, including to evaluate the sub-surface soil-vapor analytical results and to review and provide comments on the Sub-Surface Soil-Vapor Report based on the investigation findings.
XXIX.D	Technical Team/Project Management	\$41,000	\$14,462	\$5,000	Budget includes fees and expenses to provide (i) technical oversight of the Multistate Trust's third-party contractor, including new Environmental Actions to integrate the cleanup plan with the future reuse of the Site, project controls, (ii) third parties access to the Site, (iii) project communications, (iv) financial management, and (v) contract management. This task also includes review of the prospective purchaser's Sub-surface Soil Vapor Sampling Report and engagement in communications with the relevant parties, including TCEQ.
XXIX.E	Project Fees & Expenses	\$4,000	\$413	\$1,260	Budget includes project fees and expenses to oversee the new Environmental Actions to integrate the cleanup plan with future reuse of the Site.
XXIX.F	Regulator Oversight Costs	\$0	\$0	\$0	Budget assumes TCEQ will not request reimbursement of oversight costs.
XXIX.G	Legal Fees and Accounting Fees	\$19,000	\$9,516	\$2,000	Budget includes fees and expenses for in-house legal services required to support Environmental Actions, including the preparation and execution of contracts. The budget also includes costs for financial services, including accounting, bookkeeping, financial reporting, invoice processing, budget preparation, and budget tracking.
XXIX.I	Lease & Property Use (Income & Costs)	\$0	\$0	\$0	Budget assumes no lease revenues in 2022
XXIX	Total Site 2022 Budget	\$157,000	\$83,440	\$17,260	
	Total Former Kerr-McGee/Triple S Refining Terminal #1 in Corpus Christi, Texas Funding at Beginning of 2022 Budget Year			\$501,349	Total funds allocated to the Site per Consent Decree and Environmental Settlement Agreement; less 2011 - 2021 actual costs; plus 2011 - 2021 actual investment activity and other receipts.
	Estimated Remaining Funds (Post-2022)			\$484,089	Initial Funding (2/14/11): \$215,477 Anadarko Settlement Funds (2015 and 2016): \$0 Proceeds from Sale of Property: \$654,813