

2024 Environmental Cost Account (ECA) Budget Forecast for the Former Tronox/Kerr-McGee Chemical Facility in Madison, Illinois¹
Greenfield Environmental Multistate Trust LLC,

Date Submitted: 12/11/2023

Trustee of Multistate Environmental Response Trust (Multistate Trust)

Exhibit I

Date Approved: 02/07/2024

Submital to: Illinois Environmental Protection Agency on December 11, 2023

Summary of Site Work Completed in 2023 and Planned for 2024:

Work Completed in 2023: Performed all planning, groundwater sampling, water-level measurements, and reporting (i.e., 2H 2022 Groundwater Monitoring Report, Annual CAE Report and the 1H 2023 Groundwater Monitoring Report) in accordance with the Hazardous Waste Management RCRA Post Closure Permit (RCRA Permit). Perform routine compliance monitoring, sampling, gauging and monitoring of Hill Street residential area monitoring wells in accordance with the RCRA Permit TAM. Performed compliance monitoring and reporting for the Wastewater Discharge Permit. Performed O&M, including (i) operating the groundwater remediation system (GRS), (ii) replacing damaged pipes, GRS sump pump, and effluent auto sampler, and (iii) cleaning the biological aeration tank (BAT), transfer pipes and the publicly owned treatment works (POTW) discharge point manhole. Mowed the site and maintained site security by repairing damaged fencing. Performed hazardous waste management unit (HWMU) post-closure care (PCC) inspections and repair of cracks. Conducted annual railroad training to staff as required to access groundwater monitoring wells located on railroad property, amended TRRA access agreement for monitoring well N3, and procured annual RPL insurance and flagging services necessary to complete the annual groundwater sampling. Assisted Illinois EPA with the EM-61 MAG survey. Initiated procurement process to obtain cost estimates for resolving property boundary and total acreage issues. Finalized the Biosparge Treatability Study Work Plan and submitted to Illinois EPA for review and approval (utilizing the RCRA TAM as the regulatory approval mechanism). Installed biosparging wells and initiated baseline sampling. Expanded and updated the 3D-CSM to incorporate an understanding of Site lithology and observations that have been documented through previous investigations. Prepared a draft groundwater ordinance for submittal (planned in late-December 2023), review and approval by Illinois EPA. Between December 22 and 27, 2022, abnormal freezing temperatures resulted in catastrophic damage to the recovery wells (e.g., damaged pipes and pumps). Six of 18 recovery wells were repaired in January 2023. The remaining 12 recovery wells were decommissioned to prevent shallow groundwater infiltration. Completed all administrative and compliance-related reporting as required by the RCRA Permit and IWDP-210 (e.g., 30-Day GRS Recovery Well Repair Summary Report, RCRA Permit TAM request, SAP updates, evaluation and reporting of water levels and sample results). Prepared an overview fact sheet for review by Illinois EPA and distributed to community mailing list. Prepared Chapter 3.G (specific to the Site) of the Multistate Trust 2022 Annual Progress Report. On February 7, 2023, the Multistate Trust submitted its "Proposed Unfunded Critical Need Determination" to its beneficiaries stating that the Owned Funded Site (OFS) in Madison, IL is an OFS with an Unfunded Critical Need as described in the draft Third Amendment to the Settlement Agreement.

Work Planned for 2024: Perform all planning, groundwater sampling, water-level measurements, and reporting (i.e., 2H 2023 Groundwater Monitoring Report, Annual CAE Report and the 1H 2024 Groundwater Monitoring Report) in accordance with the RCRA Permit. Perform routine compliance monitoring, sampling, gauging and monitoring of Hill Street residential area monitoring wells in accordance with the RCRA Permit TAM. Perform compliance monitoring and reporting for the Wastewater Discharge Permit. Perform O&M, including operating the GRS, disposing BAT cleanout waste, and planned repairs. Perform mowing and site security. Perform the HWMU PCC, including inspections and repairs. Provide annual railroad training to staff as required to access groundwater monitoring well N3 located on TRRA property, pay access fees (\$7,000), and procure annual RPL insurance and flagging services necessary to complete the annual groundwater sampling. Prepare of an updated sampling and analysis plan (\$50,000 placeholder allowance) to meet the requirements of the renewed RCRA Permit (pending). Budget includes a \$100,000 placeholder allowance for unplanned or emergency events/repairs. Complete a boundary survey to resolve the discrepancy as related to the total acres owned by the Multistate Trust. Prepare a Passive Soil Gas Sampling Work Plan and implement sampling pursuant to RCRA Permit TAM. Prepare a VIMS Work Plan to evaluate the need for VIMS in up to fifteen homes, perform VIMS building surveys and diagnostic testing to evaluate building construction of each home, and prepare a standard VIMS construction design for constructing and installing VIMS, if necessary (note: a budget amendment will be submitted to include construction and installation costs, if soil gas results are above the established and Illinois EPA-approved remedial objectives). Continue implementing the Biosparge Treatability Study and once complete, issue report. Prepare Biosparge Interim Remedial Action Plan (IRAP), including biosparge treatment design, construction drawings, description of remedial activities, implementation schedule, biosparge remedy performance monitoring plan and Class 2 cost estimate. Provide on-call technical subject matter expertise, including RCRA Permit renewal support, groundwater ordinance support, community engagement support and preparing a waste management plan (\$100,000 placeholder allowance). Finalize groundwater ordinance. Prepare updated fact sheet (as necessary) and distribute to the nearby residents and community officials. Participate in meetings with the beneficiaries, stakeholders, and residents as appropriate. Host a drop-in informational session and community meeting to support providing site-related environmental information to this community with Environmental Justice concerns. Budget also includes time for the Multistate Trust's Director of Environmental Justice Policies and Programs to support Environmental Justice-specific community engagement. Prepare the Multistate Trust 2023 Annual Progress Report (portion specific to the Site).

Site Name: Former Tronox/Kerr-McGee Chemical Facility in Madison, Illinois (the Site)

Site Location: Madison, Illinois

Multistate Trust Site Code: VIII

Cost Center	Cost Center Description	Total 2023 Approved Budget	Project Costs incurred in 2023 (as of 9/30/2023)	2024 Budget	2024 Scope of Work
VIII.A	Regulatory Compliance and Site Operations/Maintenance	\$913,000	\$465,902	\$809,000	Budget includes costs to (i) perform all planning, groundwater sampling, water-level measurements, and reporting (i.e., 2H 2023 Groundwater Monitoring Report, Annual CAE Report and the 1H 2024 Groundwater Monitoring Report) in accordance with the RCRA Permit, including the RCRA TAM; (ii) routine compliance monitoring, sampling, gauging and monitoring of Hill Street residential area monitoring wells in accordance with the RCRA Post-Closure Permit TAM; (iii) perform compliance monitoring and reporting for the Wastewater Discharge Permit; (iv) perform routine O&M, including operating the GRS, disposing BAT cleanout waste, and planned repairs; (v) perform mowing and site security; (vi) perform the HWMU PCC, including inspections and repairs; and (vii) provide annual railroad training to staff as required to access groundwater monitoring wells located on TRRA property, pay access fees (\$7,000 placeholder allowance), and procure annual RPL insurance and flagging services necessary to complete the annual groundwater sampling. Budget also includes all utilities to operate the GRS and a \$100,000 placeholder allowance for an unplanned and/or emergency events.
VIII.C	New Environmental Actions	\$913,000	\$64,768	\$889,000	Budget includes costs to: (i) prepare of an updated sampling and analysis plan (\$50,000 placeholder allowance) to meet the requirements of the renewed RCRA Permit (pending); (ii) complete a boundary survey to resolve the discrepancy as related to the total acres owned by the Multistate Trust; (iii) prepare a Passive Soil Gas Sampling Work Plan and implement sampling pursuant to RCRA TAM; (iv) prepare a VIMS Work Plan to evaluate the need for VIMS in up to fifteen homes, perform VIMS building surveys and diagnostic testing to evaluate building construction of each home, and prepare a standard VIMS construction design for constructing and installing VIMS if necessary (note: a budget amendment will be submitted to include construction and installation costs, if soil gas results are above the established and Illinois EPA-approved remedial objectives); (v) continue implementing the Biosparge Treatability Study and once complete, issue report; (vi) prepare Biosparge IRAP, including biosparge treatment design, construction drawings, description of remedial activities, implementation schedule, biosparge remedy performance monitoring plan and Class 2 cost estimate; (vii) provide on-call technical subject matter expertise, including RCRA Permit renewal support, groundwater ordinance support, community engagement support and preparing a waste management plan (\$100,000 placeholder allowance); and (viii) support preparation and distribution of an updated fact sheet.
VIII.D	Technical Team/Project Management	\$263,500	\$102,046	\$333,000	Budget includes fees and expenses for providing project direction and oversight of technical elements of on-going and new Environmental Actions including Site strategy, technical oversight of environmental contractors, project controls, project communications, financial management, beneficiary communications, community involvement (including hosting a drop-in informational session and community meeting to support providing site-related environmental information to this community with Environmental Justice concerns), quality assurance/quality control, contract management, and facilitation of future reuse and integration of the cleanup plans. Budget also includes time for the Multistate Trust's Director of Environmental Justice Policies and Programs to support Environmental Justice-specific community engagement. Budget also includes fees for preparing the Multistate Trust 2023 Annual Progress Report.
VIII.E	Project Fees & Expenses	\$14,000	\$3,544	\$14,000	Budget includes Managing Principal time and expenses for: oversight and approval of technical strategy and Environmental Actions; beneficiary communications; support for beneficiary community involvement; key stakeholder communications; Settlement Agreement matters; budget submittals; redevelopment planning activities; and preparing the Multistate Trust 2023 Annual Progress Report.
VIII.F	Regulator Oversight Costs	\$0	\$0	\$0	Regulatory oversight costs for lead agency.
VIII.G	Legal Fees and Accounting Fees	\$50,000	\$24,649	\$50,000	Budget includes fees and expenses for in-house legal services required to support Environmental Actions, including the preparation and execution of contracts, SOWs, access agreements, and other legal affairs. Budget includes costs for financial services, including accounting, bookkeeping, financial reporting, invoice processing, budget preparation, and budget tracking. Budget also includes costs for legal and financial affairs support in preparing the Multistate Trust Annual 2023 Progress Report.
VIII.I	Lease & Property Use (Income & Costs)	\$0	\$0	\$0	Budget assumes no lease revenues in 2024.
VIII	Total Site 2024 Budget	\$2,153,500	\$660,908	\$2,095,000	
Total Former Tronox/Kerr-McGee Chemical Facility in Madison, Illinois Estimated Funding at Beginning of 2024 Budget Year*				\$2,829,000	Total funds allocated to the Site per Consent Decree and Environmental Settlement Agreement; less 2011 - 2022 actual and 2023 estimated costs; plus 2011 - 2022 actual and 2023 estimated investment activity and other receipts.
Estimated Remaining Funds (Post-2024)				\$734,000	Initial Funding (2/14/11): \$1,294,468 Anadarko Settlement Funds (2015 and 2016): \$6,797,145 Waterfall Distribution from Sale of Property: \$36,801

*This is a projection based on estimates and is subject to change once final costs have been received. Actual balances are presented in the quarterly distributed financial statements.

This Single Page Document Constitutes the Annual Budget Submitted to the Lead Agency under Section 3.2.4 of the Multistate Environmental Response Trust Agreement. Supplemental Worksheets, if any, Do Not Comprise a Portion of the Annual Budget.

Notes:

The Multistate Trust has determined that this Owned Funded Site (OFS) is a site with an Unfunded Critical Need. Pursuant to the draft Third Amendment to the Settlement Agreement, an "Unfunded Critical Need" shall mean a Trust's inability, because of insufficient funding in a Trust Site's Environmental Cost Account or Work Account, (i) to control or mitigate (including performance of operation and maintenance activities as part of such control or mitigation) ongoing human exposures or an imminent threat of human exposures to hazardous substances, hazardous wastes, contaminants, or pollutants, on or from the Site, at concentrations that exceed levels protective of human health under applicable criteria established by relevant government agencies, or (ii) to characterize the Site adequately to determine whether such exposures or imminent threat of exposures exists.