

**2024 Environmental Cost Account (ECA) Budget Forecast for the Former Tronox/Kerr-McGee (Moss American) Site in Sauget, Illinois<sup>1</sup>**

**Date Submitted: 12/11/2023**

Greenfield Environmental Multistate Trust LLC,

**Date Approved: 02/07/2024**

Trustee of Multistate Environmental Response Trust (collectively, the Multistate Trust)

**Exhibit I**

**Submission 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 routine Site operation, security, property maintenance activities, monthly gauging of dense non-aqueous phase liquid (DNAPL as creosote), annual groundwater monitoring (i.e., site-wide baseline groundwater) and reporting activities. Repaired approximately 90 linear feet of chain link security fence to prevent unauthorized access by trespassers and risk of exposure to Site-related contaminants of concern in surface soil. Began implementing the Illinois EPA-approved SRI Work Plan including: (i) preparing contractor-specific revisions to the health and safety plan (HASP), quality assurance project plan (QAPP) and waste management plan (WMP); (ii) initiating field planning activities, including, subcontractor procurement, property access agreements, and utility locating; (iii) performing certain field work, including site-wide baseline groundwater sampling and DNAPL delineation using TarGOST; (iv) preparing an SRI overview fact sheet for distribution to the nearby residents, and (v) installing temporary chain link fencing to allow access to specific residential properties for well cluster, temporary piezometer, and soil-gas probe installations. Prepared Chapter 3.H (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 that the Owned Funded Site (OFS) in Sauget, 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 (i) routine Site security (including fence repairs), inspection (includes LQG inspection requirements), and maintenance activities, (ii) compliance-related activities, including preparing a Spill Prevention, Control, and Countermeasures (SPCC), and (iii) monthly gauging of dense non-aqueous phase liquid (DNAPL as creosote). Install protective bollards around onsite groundwater well clusters in high-traffic areas. Continue implementing the Illinois EPA-approved SRI, including but not limited to, subcontractor procurement and utility locating, (ii) field work and data management activities to implement the SRI as approved by Illinois EPA, (iii) SRI Reporting, (iv) semiannual and annual groundwater sampling, laboratory analysis, and reporting; (v) SRI waste disposal; and (vi) environmental data management. The budget also includes an SRI contingency amount (\$425,000) to support real-time decision making with respect to additional data collection, step-outs, and development of a 3-D CSM using historical geologic information collected by Kerr-McGee/Tronox and new data collected as part of the SRI. If the vapor intrusion sampling results indicate that the vapor intrusion pathway is complete, the Multistate Trust will work with Illinois EPA to determine the best path forward. A budget amendment will be submitted to reallocate ECA funds as appropriate. Prepare a fact sheet and distribute to the nearby residents and community officials. Participate in meetings with the beneficiaries, stakeholders, and residents as appropriate. Prepare the Multistate Trust's 2023 Annual Progress Report (portion specific to the Site).

**Site Name: Former Tronox/Kerr-McGee (Moss American) Site in Sauget, Illinois (the Site)**

**Site Location: Sauget, Illinois**

**Multistate Trust Site Code: IX**

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
IX.A	Regulatory Compliance and Site Operations/Maintenance	\$124,000	\$58,525	\$159,000	Budget includes: (i) routine Site security (including fence repairs as needed), inspection (includes LQG inspection requirements), and maintenance activities; (ii) basic Site utilities (power and water); (iii) manual dense nonaqueous phase liquid (DNAPL as creosote) recovery; (iv) installation of protective bollards at select onsite groundwater monitoring well clusters; (v) \$1000 placeholder allowance for Large Quantity Generator status fees; and (vi) preparation of a SPCC to comply with "emergency preparedness and prevention" requirements. Budget also includes a \$10,000 placeholder allowance for unplanned or emergency events. Semiannual and annual groundwater sampling, laboratory analysis and reporting is included in Cost Center C while the SRI is being implemented. Utilities, laboratory charges and other routine O&M budgets have been estimated to account for potential rate adjustments due to inflation. The Multistate Trust will monitor actual costs incurred and impacts to the 2024 ECA budget and if necessary, submit a budget amendment.
IX.C	New Environmental Actions	\$2,696,000	\$260,585	\$2,028,000	Budget includes: (i) Multistate Trust third-party contractor project management for their various SRI-related scopes of work in 2024; (ii) community engagement support (e.g., graphic support and flyer distribution); and (iii) implementation of the SRI, including (1) field planning activities, including but not limited to, subcontractor procurement and utility locating, (2) field work and data management activities to implement the SRI as approved by Illinois EPA, (3) SRI Reporting, (4) semiannual and annual groundwater sampling, laboratory analysis, and reporting; (5) SRI waste disposal; and (6) environmental data management. The budget also includes an SRI contingency amount (\$425,000) to support real-time decision making with respect to additional data collection, step-outs, and development of a 3-D CSM using historical geologic information collected by Kerr-McGee/Tronox and new data collected as part of the SRI.
IX.D	Technical Team/Project Management	\$209,000	\$70,744	\$272,000	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, quality assurance/quality control, contract management, and facilitation of future reuse and integration of the cleanup plans. Budget also includes fees for preparing the Multistate Trust 2023 Annual Progress Report.
IX.E	Project Fees & Expenses	\$14,000	\$1,811	\$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.
IX.F	Regulator Oversight Costs	\$20,000	\$9,286	\$20,000	Regulatory oversight costs for lead agency.
IX.G	Legal Fees and Accounting Fees	\$46,000	\$17,333	\$46,000	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 preparation of Multistate Trust Annual 2023 Progress Report.
IX.I	Lease & Property Use (Income & Costs)	\$0	\$0	\$0	Budget assumes no lease revenues in 2024.
IX	Total Site 2024 Budget	\$3,109,000	\$418,283	\$2,539,000	
<b>Total Former Tronox/Kerr-McGee (Moss American) Site in Sauget, Illinois Estimated Funding at Beginning of 2024 Budget Year*</b>				<b>\$3,633,000</b>	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.
<b>Estimated Remaining Funds (Post-2024)</b>				<b>\$1,094,000</b>	<b>Initial Funding (2/14/11): \$3,960,429</b> <b>Anadarko Settlement Funds (2015 and 2016): \$4,531,430</b> <b>Waterfall Distribution from Sale of Property: \$24,534</b> <b>1988 Consent Decree: \$56,476</b>

\*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:**

<sup>1</sup> 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.