2024 Environmental Cost Account (ECA) Budget Forecast for the Kerr-McGee Chemical Corp. Facility in Meridian, Mississippi
Greenfield Environmental Multistate Trust LLC,

Date Submitted: 12/21/2023

Trustee of Multistate Environmental Response Trust (collectively, the Multistate Trust) Date Approved: 02/02/2024 Submittal to: US Environmental Protection Agency (Region 4) on December 21, 2023

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

Work Completed in 2023: Continued post-closure care of closed hazardous waste impoundment and performed site security and routine maintenance activities. A waste management plan will be developed for the Site and investigation derived waste will be properly disposed of (December 2023). The 2022 post-closure care inspections were summarized in the 2022 Annual Post-Closure Permit Compliance Letter, which was submitted to MDEQ on May 19, 2023 . On June 29, 2023, the Multistate Trust submitted the final Corrective Measures Study (CMS) report to EPA and MDEQ for review and comment. The Multistate Trust coordinated with the Meridian Airport Authority to remove flight path hazards that were identified on the Site property. Multistate Trust coordinated with City of Meridian, regarding sewer easement request for sewer upgrades on the Site property.

Work Planned for 2024: Continue post-closure care of closed hazardous waste impoundment and perform site security and routine maintenance. The waste management plan will be finalized for the Site and any investigation derived waste remaining onsite (not removed during 2023) will be properly disposed of. Monitoring well repairs and maintenance will be conduct as identified in the 2023 Annual Post-Closure Permit Compliance Letter. The Multistate Trust will review the draft Closure Care Permit evaluating compliance sampling for the proposed remedy, and evaluating draft permit requirements. The Multistate Trust will address any comments from EPA and MDEQ as needed regarding the Corrective Measures Study (CMS) Report, submitted to EPA/MDEQ review and approval June, 29, 2023. Pre-design investigations will be completed to include: a topographic survey, a bathymetric stream survey of Sowashee Creek, and geotechnical evaluation of the Sowashee Creek bank area, preliminary grading and drainage planning activities, streambank stabilization assessment and preliminary design of Sowashee Creek stabilization corrective measure, facility preliminary wetland mitigation planning activities. Permit planning activities will be conducted to support future implementation of corrective measures. A placeholder allowance for potential community relations and redevelopment planning activities, regarding the public notification of the draft Closure Permit. The Multistate Trust will start preparing a preliminary corrective measures design and preparation of the preliminary corrective measures design cost estimate for the Site. The Multistate Trust will review and provide comments on the City of Meridian's Soil Management Plan and Dewatering Plan, in support of planned sewer utility upgrades located on the site property.

Site Name: Kerr-McGee Chemical Corp. Facility in Meridian, Mississippi (the Site)

Site Location: Meridian, Mississippi

Multistate Trust Site Code: XVIII					
Cost Center	Cost Center Description	Total 2023 Approved Budget	Project Costs incurred in 2023 (as of 10/31/2023)	2024 Budget	2024 Scope of Work
XVIII.A	Regulatory Compliance and Site Operations/Maintenance	\$160,000	\$66,459	\$143,000	The Multistate Trust will conduct regulatory compliance through semi-annual inspections and reporting for RCRA post-closure care of closed impoundment. General Site operations, maintenance, and security activities will be conducted to include: maintain security fencing and signage and conduct vegetation control. A waste management plan will be developed for the Site and investigation derived waste will be properly disposed of. Monitoring well repairs and maintenance will be conduct as identified in the 2023 Annual Post-Closure Permit Compliance Letter. The Multistate Trust will review the draft Closure Care Permit evaluating compliance sampling for the proposed remedy, and evaluating draft permit requirements.
xvIII.c	New Environmental Actions	\$975,000	\$101,601	\$1,097,000	The Multistate Trust will address any comments from EPA and MDEQ as needed regarding the Corrective Measures Study (CMS) Report, submitted to EPA/MDEQ review and approval June, 29, 2023. Pre-design investigations will be completed to include: a site topographic survey, a bathymetric stream survey of Sowashee Creek, and geotechnical evaluation of the Sowashee Creek bank area, preliminary grading and drainage planning activities, streambank stabilization assessment and preliminary design of Sowashee Creek stabilization corrective measure, facility preliminary wetland mitigation planning activities. Permit planning activities will be conducted to support future implementation of corrective measures. A placeholder allowance for potential community relations and redevelopment planning activities, regarding the public notification of the draft Closure Permit. The Multistate Trust will start preparing a preliminary corrective measures design and preparation of the preliminary corrective measures design cost estimate for the Site. The Multistate Trust will review and provide comments on the City of Meridian's Soil Management Plan and Dewatering Plan, in support of planned sewer utility upgrades located on the site property.
XVIII.D	Technical Team/Project Management	\$180,000	\$37,730	\$240,000	Budget includes fees and expenses for providing project direction and oversight of technical elements of on-going and new Environmental Actions including Site strategy, remedy design and proposed construction review, technical oversight of environmental contractors, project communications, financial management, beneficiary communications, community involvement, quality assurance/quality control, and contract management. Budget also includes fees for preparation of Multistate Trust Annual Progress Report.
XVIII.E	Project Fees & Expenses	\$21,000	\$5,591	\$21,000	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 preparation of Multistate Trust Annual Progress Report.
XVIII.F	Regulator Oversight Co	\$50,000	\$0	\$50,000	Placeholder estimates for MDEQ oversight costs.
XVIII.G	Legal Fees and Accounting Fees	\$53,000	\$19,486	\$74,000	Budget includes third-party legal costs to advise the Multistate Trust on contract matters and fees and expenses for in-house legal services required to support Environmental Actions, including the preparation and execution access agreements, permit reviews, contracts, community involvement, Site reuse, and property related issues. 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 Progress Report.
XVIII.I	Lease & Property Use (Income & Costs)	\$0	\$3,850	\$0	Budget assumes no lease revenues in 2024.
XVIII	Total Site 2024 Budget	\$1,439,000	\$227,017	\$1,625,000	
	Total Kerr-McGee Chemical Corp. Facility in Meridian, Mississippi Estimated Funding at Beginning of 2024 Budget Year* \$19,418,000				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) \$17,793,000				\$17,793,000	Initial Funding (2/14/11): \$1,298,956 Anadarko Settlement Funds (2015 and 2016): \$22,657,151 Waterfall Distribution from Sale of Property: \$122,669
*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.					