

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

**Date Submitted: 1/02/2024**

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

**Exhibit 1**

**Date Approved: 1/19/2024**

**Submittal to: US Environmental Protection Agency (Region 4) on January 2, 2024**

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

**Work Completed in 2023:** Conducted routine site security, property maintenance activities, and operation of groundwater recovery and treatment system. Conducted semi-annual groundwater monitoring sampling and reporting. Provided technical support to EPA in the preparation of the OU3/OU5 Proposed Plan document. Continued field activities to support to USGS/EPA-led phytoremediation pilot study, including ongoing groundwater monitoring. Completed OU1 final grading, seeding and surveying activities in the Pine Yard. Supported EPA with the development of figures and data for determination of the new OU4 boundary. Prepared a draft sampling plan for the 27th Avenue ditch as requested by the City of Columbus. Completed OU2 remedial action construction activities at property 18-16 to remove additional soil under professional arborist supervision to avoid harm to trees in conformance with property owner request. Completed additional soil sampling of property 18-36 in response to residual soils left on the property after the City of Columbus ditch clearing activities. Completed groundwater treatment system repairs and modifications to increase efficiency and safety of treatment system operations, including controls and new air compressor for pneumatic valve controls. Prepared a Waste Management Plan for the site, summarizing regulatory requirements, training, management, documentation, storage, inspection and control of on-site remediation waste streams. Worked with BNSF, EPA and City of Columbus to develop a sampling plan for the BNSF portion of the Eastern Ditch.

**Work Planned for 2024:** Continue routine general property operations and maintenance, semi-annual groundwater compliance sampling and reporting, and groundwater recovery and treatment system operation and permit compliance. Includes disposal of remediation waste and property utility fees. Includes allowances for unforeseen potential groundwater recovery and treatment system repairs and transport and disposal of recovered DNAPL at an offsite facility. Support public involvement activities, including community outreach, CAG meetings, distribution of fact sheets and other information. The Multistate Trust will complete final sampling and other final field activities to support USGS/EPA phytoremediation pilot study. A site survey will be conducted to support the site drainage analysis and determine pre-design investigation needs for the selected portions of the remedy. After issuance of the OU3/OU5 Record of Decision (ROD) a basis of design (15% design) will be developed for the OU3 remedy. A soil management plan will be developed as an institutional control to outline necessary protections and actions for OU5. Includes an allowance based on the OU3/OU5 Feasibility Study estimate for remedial design activities for the preferred alternative in the October 2023 OU3/OU5 Proposed Plan. The Multistate Trust will conduct additional environmental actions at OU2 including final restoration activities at property 18-16 and soil removal and final restoration activities at property 18-36. The OU-2 Remedial Action Completion Report (RACR) will be finalized to include the property 18-16 and 18-36 activities and submitted to Beneficiaries. Groundwater sampling to assess for potential vapor intrusion risks will be conducted in the Pine Yard. Soil sampling in support of ditch vegetation clearing activities for the 27th Street ditch and BNSF Eastern ditch are also included. After issuance of the OU3/OU5 ROD and completion of design tasks, the Multistate Trust will prepare a construction scope of work (SOW) and request for proposals (RFP) package to solicit bids for implementation of the OU3/OU5 remedy. **Construction activities for OU3 are not included in this budget.** A Budget Amendment will be requested for the implementation of the OU3 remedy after the pre-design investigations and development of a basis of design (15% design) have been completed, and a construction cost estimate developed for the OU3 remedy.

**Site Name: Kerr-McGee Chemical Corp. Superfund Site in Columbus, Mississippi (the Site)**

**Site Location: Columbus, Mississippi**

**Multistate Trust Site Code: XVI**

Cost Center	Cost Center Description	Total 2023 Approved Budget	Project Costs incurred in 2023 (as of 11/30/2023)	2024 Budget	2024 Scope of Work
XVI.A	Regulatory Compliance and Site Operations/Maintenance	\$1,345,500	\$569,120	\$846,000	Budget scope includes general property operations and maintenance, semi-annual groundwater compliance sampling and reporting, inspections in accordance with the Site's Spill Prevention Control and Countermeasure ("SPCC") and Waste Management Plans, and groundwater recovery and treatment system operation and permit compliance. Includes disposal of remediation waste and property utility fees. An allowance has been added for unforeseen potential groundwater recovery and treatment system repairs, and transport and disposal of onsite recovered DNAPL at an offsite facility are included.
XVI.C	New Environmental Actions	\$2,260,300	\$764,309	\$1,722,500	Budget includes contractor project management, communications/meetings with Multistate Trust, EPA and MDEQ, schedule updates, strategic planning, management of public information repository. Includes contractor labor and expenses to support public involvement activities, including community outreach, CAG meetings, distribution of fact sheets and other information. The Multistate Trust will complete final rounds of groundwater sampling and other final field activities in support of USGS/EPA phytoremediation pilot study. A site survey will be conducted to support the site drainage analysis and determine pre-design investigation needs for the selected portions of the remedy. A basis of design (15% design) will be developed for the OU-3 remedy. A soil management plan will be developed as an institutional control to outline necessary protections and actions for OU-5. Includes an allowance based on the OU3/OU5 Feasibility Study estimate for remedial design activities for the proposed alternative in the October 2023 OU3/5 Proposed Plan. The Multistate Trust will conduct additional environmental actions at OU-2, to include final restoration activities of the 18-16 property, and removal of residual soil on the 18-36 property from Burlington Northern Santa Fe (BNSF) Railroad (Eastern) Ditch cleanout activities by the City, and final restoration activities at the 18-36 property. The OU-2 RACR will be updated summarizing the 18-16 and 18-36 activities. Groundwater sampling to assess for potential vapor intrusion risks will be conducted in the Pine Yard. Soil sampling in support of ditch vegetation clearing activities for the 27th Street ditch and BNSF Railroad (Eastern) Ditch are also included.
XVI.D	Technical Team/Project Management	\$429,000	\$366,543	\$443,000	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 and coordination with environmental contractors, project controls, project communications, financial management, beneficiary communications, quality assurance/quality control, and contract management. Budget includes implementation of community outreach and engagement efforts, facilitation of community meetings, and redevelopment planning activities. Budget also includes fees for preparation of Multistate Trust Annual Progress Report.
XVI.E	Project Fees & Expenses	\$109,000	\$52,841	\$88,000	Budget includes Managing Principal time and expenses for: oversight and approval of technical strategy and Environmental Actions; beneficiary communications; support for beneficiary and community involvement; key stakeholder communications; policy matters; Settlement and Trust Agreement matters; redevelopment planning activities; and preparation of Multistate Trust Annual Progress Report. Budget includes anticipated level of effort by the Managing Principal to: support EPA and Multistate Trust staff on potential property transfer negotiations for the Pine Yard, contracting plans and continuity of operations matters; and preparation of the Columbus annual progress report.
XVI.F	Regulator Oversight Costs	\$250,000	\$0	\$50,000	Placeholder budget for MDEQ oversight.
XVI.G	Legal Fees and Accounting Fees	\$151,000	\$120,621	\$151,000	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 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 Progress Report.
XVI.I	Lease & Property Use (Income & Costs)	\$0	\$0	\$0	Budget assumes no lease revenues in 2023.
XVI	Total Site 2024 Budget	\$4,544,800	\$1,873,434	\$3,300,500	
Total Kerr-McGee Chemical Corp. Superfund Site in Columbus, Mississippi Estimated Funding at Beginning of 2024 Budget Year*				\$18,221,000	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)				\$14,920,500	Initial ECA Funding (2/14/11): \$2,827,231 Initial SA Funding (2/14/11): \$2,692,871 Anadarko Settlement Funds (2015 and 2016) Received in Anadarko Amount Account (AA): \$67,971,452 Fund transfer from SA to ECA on 10/13/2013: \$538,773 Fund transfer from AA to ECA 2015-2023: \$69,066,100 Fund transfer from AA to SA on 8/11/2015: \$1,160,252 Waterfall Distribution from Sale of Property in ECA: \$368,008
Estimated Balance Segregated Amount Subaccount (SA)				\$2,895,000	The Trust does not plan to use funds from the SA in 2024.
Estimated Balance TOTAL (Post-2024)				\$17,815,500	Total all accounts (ECA and SA)

\*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.