

2022 Environmental Cost Account (ECA) Budget Forecast for the Kerr-McGee Chemical Corp Superfund Site in Soda Springs, Idaho

Greenfield Environmental Multistate Trust LLC,

Trustee of Multistate Environmental Response Trust (Multistate Trust)

Exhibit I

Date Submitted: 11/26/21

Date Approved: 12/13/21

Submitted to: United States Environmental Protection Agency (Region 10) on November 26, 2021

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

Work Completed in 2021: Prepared Monitored Natural Attenuation Evaluation; Anticipated Effects of 10-Acre Pond TCRA Evaluation; and Draft Focused Feasibility Study Report. Supported EPA in preparation of Proposed Plan, Community Involvement Plan, and Site Fact Sheet. Started project website. Routine site operations, maintenance and regulatory compliance activities, including Site caretaking, repository leachate management, monthly inspections and reporting, annual LTM sampling & reporting. A supplementary LTM sampling event was conducted in the fall of 2021. Re-seeded approximately 30 acres of Site to promote revegetation. Participated in technical project update meetings with EPA/IDEQ and status meetings with the City of Soda Springs.

Work Planned for 2022: Address EPA/IDEQ comments on FFS Report, complete the Final FFS Report, including Final Monitored Natural Attenuation Evaluation and Anticipated Effects of 10-Acre Pond TCRA Evaluation. Launch project website. Support EPA in the preparation of the Proposed Plan, ROD Amendment, and Five-Year Review. Initiate on-Site institutional controls and begin program to establish off-Site groundwater use restrictions. Participate in public outreach and public engagement activities, including: fact sheet preparation and distributions, organizing and holding public meeting(s), and maintaining project website. Conduct Site Reuse/Redevelopment activities. Routine site operations, maintenance and regulatory compliance activities, including Site caretaking, repository leachate management, monthly inspections and reporting, annual LTM sampling & reporting. A supplementary LTM sampling event is budgeted for the fall of 2022. Participate in technical project update meetings with EPA/IDEQ and status meetings with the City of Soda Springs.

Site Name: Kerr-McGee Chemical Corp Superfund Site in Soda Springs, Idaho (the Site)

Site Location: Soda Springs, Idaho

Multistate Trust Site Code: VII

Cost Center	Cost Center Description	Total 2021 Approved Budget	Project Costs incurred in 2021 (as of 9/30/2021)	2022 Budget	2022 Scope of Work
VII.A	Regulatory Compliance and Site Operations/Maintenance	\$439,000	\$243,437	\$435,000	Routine site operations, maintenance and regulatory compliance activities, including monthly inspections, ongoing Site maintenance, repository leachate management, and monthly reporting. The Site LTM Plan will be updated to reflect changes in LTM resulting from 2021 LTM results. Includes pumping and disposal of leachate from both on-Site landfills/repositories, including \$10k for off-Site disposal of leachate and purged groundwater from groundwater sampling events. Includes annual LTM sampling, analytical costs, and annual LTM reporting. Also includes \$12k to obtain new performance bond for monitoring wells located on City of Soda Springs property - to maintain compliance with access agreement. LTM sampling assumed to include same number of sample locations, and same analytical methods/analytes as those performed in fall 2021. Includes data validation and database management for newly collected data. Includes fire break maintenance, weed spraying, Site mowing, and \$15k to perform additional site re-vegetation work (if necessary) to improve vegetative cover. Includes all Site utilities. Also includes \$25k placeholder for response to unplanned events.
VII.C	New Environmental Actions	\$1,291,000	\$580,161	\$965,000	Perform supplemental groundwater sampling event (fall 2022) to supplement June Annual LTM Event and provide post-removal action data to track groundwater response to waste removal. Address EPA/IDEQ comments on Focused Feasibility Study (FFS) Report and complete FFS Report. Support EPA in preparation of Proposed Plan, ROD Amendment, and Five-Year Review, including associated public meetings / site visits. Update and maintain project website. Perform data validation and data management for all newly collected data. Prepare environmental covenants package to emplace intuitional controls for on-Site land use. Work with EPA and IDEQ to identify and establish off-Site institutional controls to prevent groundwater use. Perform Site reuse / redevelopment activities to align opportunities and constraints of the Site with prospective future user needs. No remedial design costs have been included; if the remedial design stage is reached in 2022, a budget amendment will be submitted. Decreased budget as compared to 2021 due to completion of modeling the effects of 10-Acre Pond TCRA on groundwater and surface water in 2021, and activities in 2022 relating primarily to the FFS Report, Proposed Plan, ROD Amendment, and Five-Year Review.
VII.D	Technical Team/Project Management	\$385,000	\$116,230	\$410,000	Budget includes fees and expenses for providing project direction and oversight of technical elements of ongoing 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, and contract management. Increased budget compared to 2021 due to ROD Amendment work in 2022.
VII.E	Project Fees & Expenses	\$61,000	\$2,782	\$43,000	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.
VII.F	Regulator Oversight Costs	\$500,000	\$74,620	\$500,000	Regulatory Oversight Cost for Lead Agency
VII.G	Legal Fees and Accounting Fees	\$129,000	\$19,142	\$120,000	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. Includes legal support for the establishment of on- and off-Site institutional controls and a \$25k allowance for outside counsel support on Idaho water rights issues. The budget also includes costs for financial services, including accounting, bookkeeping, financial reporting, invoice processing, budget preparation, and budget tracking.
VII.I	Lease & Property Use (Income & Costs)	\$0	\$1,297	\$0	Projected revenue from the existing lease agreement is not a material source of projected site revenue and, as a result, is not included in this line item.
VII	Total Site 2022 Budget	\$2,805,000	\$1,035,075	\$2,473,000	
	Total Kerr-McGee Chemical Corp Superfund Site in Soda Springs, Idaho Estimated Funding at Beginning of 2022 Budget Year*			\$72,769,000	Total funds allocated to the Site per Consent Decree and Environmental Settlement Agreement; less 2011 - 2020 actual and 2021 estimated costs; plus 2011 - 2020 actual and 2021 estimated investment activity and other receipts.
	Estimated Remaining Funds (Post-2022)			\$70,296,000	Initial Funding (2/14/11): \$6,050,929 Anadarko Settlement Funds (2015 and 2016): \$90,628,603 Waterfall Distribution from Sale of Property: \$490,678 Other Property Sales: \$1,500

*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.