

**2023 Environmental Cost Account (ECA) Budget Forecast for the Kerr-McGee Chemical Corp Superfund Site in Soda Springs, Idaho**

**Date Submitted: 11/21/22**

Greenfield Environmental Multistate Trust LLC,  
Trustee of Multistate Environmental Response Trust (Multistate Trust)

**Exhibit I**

**Date Approved: 12/12/22**

Submittal to: United States Environmental Protection Agency (Region 10) on November 21, 2022

**Summary of Site Work Completed in 2022 and Planned for 2023:**

**Work Completed in 2022:** Addressed EPA/IDEQ comments on FFS Report, submitted the Final (and Revised Final) FFS Report(s), including Final Monitored Natural Attenuation Evaluation and Anticipated Effects of 10-Acre Pond TCRA Evaluation. Launched project website. Supported EPA in the preparation of the Proposed Plan, Community Involvement Plan, and Five-Year Review. Prepared a draft petition for an Area of Drilling Concern to establish off-Site groundwater use restrictions. Participated in public outreach and public engagement activities, including: fact sheet preparation and distribution to approximately 2,400 area businesses and residents. Performed routine site operations, maintenance and regulatory compliance activities, including Site caretaking, repository leachate management, monthly inspections and reporting, annual LTM sampling & reporting. Participated in technical project update meetings with EPA/IDEQ.

**Work Planned for 2023:** Support the preparation and/or finalization of the FFS Report, Proposed Plan, and ROD Amendment, including associated public meetings. Prepare Treatability Study Work Plan and implement plan, including well installations, bulk sample collection, perform bench and laboratory testing for in-situ and ex-situ groundwater treatment, implementation and monitoring of field trials of in-situ and ex-situ treatment, and preparation of a Treatability Test Report. Initiate on-Site institutional controls and submit petition for an Area of Drilling Concern to the Idaho Department of Water Resources 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. Routine site operations, maintenance and regulatory compliance activities, including Site caretaking, repository leachate management, monthly inspections and reporting, annual LTM sampling & reporting. 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 2022 Approved Budget	Project Costs incurred in 2022 (as of 9/30/2022)	2023 Budget	2023 Scope of Work
VII.A	Regulatory Compliance and Site Operations/Maintenance	\$435,000	\$186,942	\$404,000	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 2022 LTM results. Includes pumping and disposal of leachate from both on-Site landfills/repositories. 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 (including TPH and TBP which were not sampled in 2022). Includes data validation and database management for newly collected data. Includes fire break maintenance, weed spraying, and Site mowing. Includes all Site utilities. Also includes \$25k placeholder for response to unplanned events. 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 2023 ECA budget and if necessary, submit a budget amendment.
VII.C	New Environmental Actions	\$965,000	\$250,597	\$2,549,000	Achieve EPA-approved FFS Report, Proposed Plan, and signed ROD Amendment. Prepare Treatability Study Work Plan and implement plan, assumed to include: installation of 4 injection/extraction wells, bulk sample collection, perform bench and laboratory testing for in-situ and ex-situ groundwater treatment, implementation and monitoring of field trials of in-situ and ex-situ treatment, and preparation of a Treatability Test Report. \$25k is included to address additional comments and finalize the Focused Feasibility Study (FFS) Report, if necessary. Support EPA in preparation of Proposed Plan, and ROD Amendment, 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 institutional controls for on-Site land use. Work with EPA and IDEQ to establish off-Site institutional controls to prevent groundwater use, including submittal of a petition for an Area of Drilling Concern to the Idaho Department of Water Resources. No remedial design costs have been included; preliminary design considerations will be incorporated into the planned Treatability Testing. Increased budget as compared to 2022 due to the implementation of in-situ and ex-situ Treatability Testing.
VII.D	Technical Team/Project Management	\$410,000	\$159,017	\$321,000	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, and contract management. Decreased budget compared to 2022 to closer align 2023 budget with 2022 YTD costs. Budget also includes fees for preparation of Multistate Trust Annual Progress Report.
VII.E	Project Fees & Expenses	\$43,000	\$6,930	\$39,000	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.
VII.F	Regulator Oversight Costs	\$500,000	\$98,293	\$500,000	Regulatory oversight costs for lead agency.
VII.G	Legal Fees and Accounting Fees	\$120,000	\$29,291	\$112,000	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. 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.
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 2023 Budget	\$2,473,000	\$729,773	\$3,925,000	
<b>Total Kerr-McGee Chemical Corp Superfund Site in Soda Springs, Idaho Estimated Funding at Beginning of 2023 Budget Year*</b>				\$71,413,000	Total funds allocated to the Site per Consent Decree and Environmental Settlement Agreement; less 2011 - 2021 actual and 2022 estimated costs; plus 2011 - 2021 actual and 2022 estimated investment activity and other receipts.
<b>Estimated Remaining Funds (Post-2023)</b>				\$67,488,000	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.