

Date Submitted: 12/01/21

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

Exhibit I

Date Approved: 01/06/22

Submission to: Missouri Department of Natural Resources on December 1, 2021

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

**Work Completed in 2021:** Performed Site operations and maintenance (O&M) of the groundwater and product recovery and treatment system (Treatment System) and compliance monitoring and reporting associated with Wastewater Discharge Permit and the Missouri Hazardous Waste Management Facility (MHWMF) Part I Permit (Permit). Performed quarterly (where applicable) and semiannual groundwater monitoring and complete the 2020 Annual Groundwater and Corrective Action Report (AGCAR). Performed required preventative maintenance/normal repairs on the existing Treatment System. Maintained absorbent booms on the Blue River to capture observed sheen. The work completed in 2021 also included (i) other O&M-related activities associated with identification of a waste disposal facility, preparation of the Wastewater Exemption Rule Technical Memorandum sampling of the abandoned drum and disposal of contents, implementation of the RW-20 corrective actions, recovery well redevelopment and rehabilitation, and resolution of the RW-15 airline blockage; (ii) finalization of the Remedial Action Optimization (RAO) Report and submittal to MoDNR for review and comment; (iii) development of a Leapfrog model, groundwater model, and updated conceptual site model (CSM); (iv) review of Treatment System data to evaluate the system's efficiency and effectiveness at meeting stated objectives as defined in the Permit, including a review of operational costs and comparison to industry benchmarks; (v) preparation of corrective measures study (CMS) or equivalent (i.e., RAO and remedial alternative analysis [RAA]) materials for participation in the December 15, 2021 RAA Workshop to refine the CMS/RAA scope and strategy; (vi) on-call technical support provided by Subject Matter Experts; and (vii) development of an environmental relational database to support the CSMs or equivalent.

**Work Planned for 2022:** Perform Site O&M of the Treatment System and compliance monitoring and reporting associated with Wastewater Discharge Permit and the Permit. Perform quarterly (where applicable) and semiannual groundwater monitoring and complete the 2021 AGCAR. Perform required preventative maintenance/normal repairs on the existing Treatment System. Maintain absorbent booms on the Blue River to capture observed sheen. The 2022 work planned also includes (i) resolution MoDNR comments on the RAO Report and submittal of a revised final report, as appropriate; (ii) a \$75,000 placeholder allowance for on-call technical support provided by various subject matter experts; (iii) finalization of deliverables associated with the RAA Workshop (e.g., meeting notes, action item tracker, summary memos, etc.); (iv) maintenance of an environmental relational database to support further CMS or equivalent and other reporting; (v) a placeholder allowance of \$100,000 to support CMSs/RAO/RAAs based on outcomes of the December 15, 2021 RAA Workshop; (vi) a placeholder allowance of \$75,000 to support Treatment System optimization effectiveness and evaluation activities based on outcomes of the December 15, 2021 RAA Workshop (allowance includes considerations for streamlining the AGCAR); and (vii) a placeholder allowance of \$50,000 for site reuse planning and remedy integration, as appropriate. Continued participation in ongoing Beneficiary and stakeholder communications including Kansas City, Jackson County, U.S. Army Corp of Engineers, and the public as necessary.

It is anticipated that a budget amendment will be submitted to refine the scope and costs of the Environmental Actions associated with the CMS/RAO/RAA, with the ultimate goal of recommending a preferred remedy and rationale for proposed selection.

Site Name: Former Tronox/Kerr-McGee Facility in Kansas City, Missouri (the Site)

Site Location: Kansas City, Missouri

Multistate Trust Site Code: XIV

Cost Center	Cost Center Description	Total 2021 Approved Budget	Project Costs incurred in 2021 (as of 10/31/2021)	2022 Budget	2022 Scope of Work
XIV.A	Regulatory Compliance and Site Operations/Maintenance	\$994,300	\$627,210	\$903,200	Budget includes all (i) planning, groundwater sampling (2 semiannual events) and reporting (i.e., AGCAR due March 1, 2022) in accordance with the MHWMF Part I Permit and the MoDNR-approved SAP/QAPP; (ii) sampling and reporting activities in accordance with the Wastewater Discharge Permit, (iii) O&M of the Treatment System to maintain compliance with the MHWMF Part I Permit and Wastewater Discharge Permit, (iv) moving and site security for the Facility, (v) DNAPL waste disposal, and (vi) finalization of the Wastewater Exemption Rule Technical Memorandum pursuant to MoDNR comments. Budget also includes all utilities to operate the Treatment System. In addition, the budget includes a \$50,000 placeholder allowance for an unplanned and/or emergency events.
XIV.C	New Environmental Actions	\$737,550	\$188,880	\$593,000	Budget includes costs to resolution MoDNR comments on the RAO Report and submittal of a revised final report, as appropriate; (ii) a \$75,000 placeholder allowance for on-call technical support provided by various subject matter experts; (iii) finalization of deliverables associated with the RAA Workshop (e.g., meeting notes, action item tracker, summary memos, etc.); (iv) maintenance of an environmental relational database to support further CMS or equivalent and other reporting; (v) a placeholder allowance of \$100,000 to support CMSs/RAO/RAAs based on outcomes of the December 15, 2021 RAA Workshop; (vi) a placeholder allowance of \$75,000 to support Treatment System optimization effectiveness and evaluation activities based on outcomes of the December 15, 2021 RAA Workshop (allowance includes considerations for streamlining the AGCAR); and (vii) a placeholder allowance of \$50,000 for site reuse planning and remedy integration, as appropriate. Continued participation in ongoing Beneficiary and stakeholder communications including Kansas City, Jackson County, U.S. Army Corp of Engineers, and the public as necessary.  It is anticipated that a budget amendment will be submitted to refine the scope and costs of the Environmental Actions associated with the CMS/RAO/RAA, with the ultimate goal of recommending a preferred remedy and rationale for proposed selection.
XIV.D	Technical Team/Project Management	\$350,000	\$106,613	\$264,000	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. Participate in ongoing Beneficiary and stakeholder communications including Kansas City, Jackson County, U.S. Army Corp of Engineers, and the public as necessary.
XIV.E	Project Fees & Expenses	\$12,000	\$426	\$11,000	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; and redevelopment planning activities.
XIV.F	Regulator Oversight Costs	\$40,000	\$1,288	\$40,000	Regulatory oversight cost for Lead Agency.
XIV.G	Legal Fees and Accounting Fees	\$54,000	\$22,299	\$50,000	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. The budget also includes costs for financial services, including accounting, bookkeeping, financial reporting, invoice processing, budget preparation, and budget tracking.
XIV.I	Lease & Property Use (Income & Costs)	\$0	\$0	\$0	Budget assumes no lease revenues in 2022
XIV	Total Site 2022 Budget	\$2,187,850	\$946,717	\$1,861,200	
	Total Former Tronox/Kerr-McGee Facility in Kansas City, Missouri Estimated Funding at Beginning of 2022 Budget Year*			\$19,393,000	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)			\$17,531,800	Initial Funding (2/14/11): \$1,743,398 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.