

2023 Environmental Cost Account (ECA) Budget Forecast for the Former Tronox/Kerr-McGee Facility in Springfield, Missouri

Greenfield Environmental Multistate Trust LLC,

Trustee of Multistate Environmental Response Trust (Multistate Trust)

Exhibit I

Date Submitted: 12/27/22

Date Approved: 01/19/23

Submit to: Missouri Department of Natural Resources on December 27, 2022

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

Work Completed in 2022: 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 the Missouri State Operating Permit (MSOP) MO-0117331, Wastewater Contribution Permit #720, and the Missouri Hazardous Waste Management Facility (MHWMF) Part I Permit. Performed semiannual and quarterly groundwater monitoring and completed the 2021 Annual Groundwater and Corrective Action Report (AGCAR). Continued implementation and associated reporting and data transmission of environmental actions outlined in the Missouri Department of Natural Resources (MoDNR)-approved Off-Facility Site Investigation Work Plan (OFIWP) including final agreements procurement for and subsequent sampling of surface water, springs and sediment at Clifton Drainage, Woodlawn Springs (Outfall 003), Golden Hills Detention Basin (GHDB) Discharge, Spring Branch, Swallow Hole, East and West Ritter Spring, and Ritter Park Spring; access agreements procurement, installation and sampling from three off-facility groundwater monitoring wells; and quarterly collection of public water supply samples in coordination with City Utilities and associated data transmittal and reporting. Submitted the Semiannual Reports for 2021 Woodlawn Spring/Outfall 003. Prepared the draft biennial report(s) for Woodlawn Spring/Outfall 003 sampling and hydraulic monitoring conducted under Appendix A of the OFIWP. Maintained sample collection readiness for soil or outdoor air sampling per the Residential Property Sampling Plan. Collected additional sewer gas and sewer water samples from the City of Springfield's sewer main in the area near the Facility to assess the effects of the sewer lining. Finalized and submitted the Final Vapor Intrusion Investigation Summary Report, including responses to MoDNR comments. Finalized and submitted the Final Greene County Highway Department (GCHD) Site Investigation Report, including responses to MoDNR comments. Abandoned six wells on the GCHD property which were installed under Phase I of the Final GCHD Site Investigation Work Plan and were subsequently approved by MoDNR for plugging and abandonment. Prepared and submitted the Residential Soil Incremental Sampling Methodology (ISM) Work Plan. Received MoDNR approval of the ISM Work Plan on September 29, 2022 and began implementing portions of the ISM field work. Continued maintenance of the environmental relational database which includes routine data collected for permit compliance and all data associated with implementation of MoDNR-approved work plan (e.g., OFIWP) and additional key environmental data collected in support of the reporting, remedial alternatives analysis (RAA) or system operations and optimization. Updated the conceptual site model (CSM) using the existing Leapfrog model. Constructed a steady-state groundwater model (focused on the area near the Treatment System) to evaluate the site's water balance and for use in future remedial alternatives evaluations. Prepared a 30% conceptual design for constructed treatment wetlands at GHDB. Participated in an in-person meeting with MoDNR to review the updated CSM and groundwater model. Developed a site-specific website and launched the website on December 14. Participated in ongoing discussions with the City of Springfield regarding ±50 damaged residential lateral sewer lines to determine next steps. Participated in Beneficiary and stakeholder communications including MoDNR, Greene County, GCHD, City of Springfield, City Utilities, and the public as necessary. Supported preparation of Chapter 3.N (specific to the Site) of the Multistate Trust 2021 Annual Progress Report. Participated in ongoing strategic discussions with the MoDNR and the United States to remove the Site from the "Critical Sites List".

Work Planned for 2023: Perform Site O&M of the Treatment System and compliance monitoring and reporting associated with the MSOP MO-0117331, Wastewater Contribution Permit #720, and MHWMF Part I Permit. Prepare and submit a permit renewal application for MSOP MO-0117331. Perform semiannual and quarterly groundwater monitoring and complete the 2022 AGCAR. Prepare the Wastewater Exemption Rule Technical Memorandum after receipt of comments from MoDNR on a similar memorandum for the Kansas City, Missouri Owned Funded Site. Clean onsite DNAPL (as creosote) storage tanks and dispose of contents. Continue implementation of the Off-Facility Investigation Work Plan, including surface water sampling at Woodlawn Spring and Golden Hills Detention Basin, public water supply sampling, private well sampling, monitoring well installation and associated reporting tasks. Install transducers in groundwater monitoring wells to further assess hydraulics along Clifton Drainage. Complete field and reporting activities associated with the Residential Yards ISM Work Plan. Perform soil-, seep water- and outdoor air-sampling as requested by residents and pursuant to the Residential Property Sampling Plan. Collect additional sewer water and sewer gas samples from the City of Springfield's sewer main in the area near the Facility to assess the effects of the sewer lining and incorporate those results into an Addendum to the VI Summary Report for MoDNR review and approval. Maintain the site's environmental relational database to support reporting and corrective measures study (CMS) or equivalent (i.e., remedial action optimization [RAO]/remedial alternative analysis [RAA]) and complete remedial system/process optimization evaluations in support of RAA. Perform site investigation/pre-design investigation activities to evaluate potential remedial alternatives, including constructed treatment wetlands, for the Golden Hills Detention Basin. Prepare updated Class 5 cost estimates, as necessary, to support long-term forecasting. Maintain the site-specific website. Participate in up to two community meetings. Perform domestic well sampling as necessary. Provide on-call subject matter expertise and other technical support services as needed. The budget also includes (i) a placeholder allowance of \$15,000 to collect groundwater seep and soil samples from residential backyards located within the Clifton Drainage, respond to odor issues, and to perform forensic analysis of samples collected within the Clifton Drainage area, as necessary; (ii) a \$1M placeholder allowance to complete all design, planning and construction activities to repair/replace up to 50 residential sewer laterals that have been reported by the City of Springfield as damaged due to previous and on-going facility operations; (iii) costs to support preparation of the Multistate Trust's 2022 Annual Progress Report (portion specific to the Site); and (iv) costs for ongoing strategic discussions with the MoDNR and the United States to remove the Site from the "Critical Sites List".

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

Site Location: Springfield, Missouri

Multistate Trust Site Code: XV

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
XV.A	Regulatory Compliance and Site Operations/Maintenance	\$988,000	\$462,873	\$924,000	Budget includes all (i) planning, groundwater sampling (2 semiannual events [Q2-2023 and Q3-2023] and 2 quarterly groundwater sampling events [Q1-2023 and Q4-2023]) and reporting (i.e., AGCAR due March 1, 2023) in accordance with the MHWMF Part I Permit and the MoDNR-approved SAP/QAPP; (ii) sampling and reporting activities in compliance with the Wastewater Discharge Permit #720 and MSOP MO-0117331 including drafting of permit renewal application; (iii) O&M of the Treatment System to maintain compliance with the MHWMF Part I Permit, MSOP MO-0117331, and Wastewater Contribution Permit #720; (iv) mowing and site security for the Facility, (v) DNAPL and other O&M-related waste disposal; and (vi) preparation of the Wastewater Exemption Rule Technical Memorandum. The budget also includes costs for (i) all utilities to operate the Treatment System; (ii) access agreement fees; and (iii) MSOP Permit (NPDES) annual fee. Budget includes a \$50,000 placeholder allowance for an unplanned and/or emergency events and a \$50,000 placeholder allowance for unplanned events related to the City of Springfield and City Utilities work within the "High Profile List Area." Note: 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.
XV.C	New Environmental Actions	\$1,219,550	\$268,351	\$2,246,000	Budget includes costs to (i) perform Multistate Trust third-party contractors project management, (ii) implement field activities in accordance with the MoDNR-approved Off-Facility Investigation Work Plan, including implementation of the surface water sampling at Woodlawn Spring and GHDB, and preparation and submittal of the associated reports including, surface water sampling at Woodlawn Spring and GHDB, public water supply sampling, domestic well sampling, and monitoring well installation; (iii) collect additional sewer gas and sewer water samples from the City of Springfield's sewer main in the area near the Facility to assess the effects of the sewer lining and incorporate those results into an Addendum to the VI Summary Report for MoDNR review and approval; (iv) complete the implementation of field activities at residential properties located adjacent to the Clifton Drainage per the MoDNR-approved Residential Yards ISM Work Plan and prepare a report summarizing the results; (v) collect additional hydraulic monitoring at monitoring wells along Clifton Drainage; (vi) maintain the site's environmental relational database to support reporting and CMS or equivalent (i.e., RAO/RAA); (vii) perform site investigation/pre-design investigation activities to evaluate potential remedial alternatives, including constructed treatment wetlands, for the GHDB; (viii) prepare updated Class 5 cost estimates, as necessary, to support long-term forecasting; (ix) maintain the site-specific website; (x) complete remedial system/process optimization evaluations in support of RAA and (xi) provide on-call subject matter expertise and other technical support services as needed. The budget also includes (i) a placeholder allowance of \$15,000 to collect groundwater seep and soil samples from residential backyards located within the Clifton Drainage, respond to odor issues, and to perform forensic analysis of samples collected within the Clifton Drainage area, as necessary; and (ii) a \$1M placeholder allowance to complete design, planning and construction activities to repair/replace up to 50 residential sewer laterals that have been reported by the City of Springfield as damaged due to previous and on-going facility operations. Laboratory charges 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.
XV.D	Technical Team/Project Management	\$393,000	\$126,249	\$293,000	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. Budget also includes fees for preparation of Multistate Trust 2022 Annual Progress Report. Budget also includes fees and expenses for ongoing strategic discussions with the MoDNR and the United States to remove the Site from the "Critical Sites List". ¹
XV.E	Project Fees & Expenses	\$16,000	\$2,756	\$17,000	Budget includes Managing Principal fees 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 2022 Annual Progress Report. Budget also includes fees and expenses for ongoing strategic discussions with the MoDNR and the United States to remove the Site from the "Critical Sites List". ¹
XV.F	Regulator Oversight Costs	\$35,000	\$4,057	\$35,000	Regulatory oversight costs for lead agency.
XV.G	Legal Fees and Accounting Fees	\$65,000	\$27,081	\$73,000	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. 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 2022 Annual Progress Report. Budget also includes fees and expenses for ongoing strategic discussions with the MoDNR and the United States to remove the Site from the "Critical Sites List". ¹
XV.I	Lease & Property Use (Income & Costs)	\$62,000	\$46,500	\$62,000	Budget lease revenues anticipated in 2023.
XV	Total Site 2023 Budget	\$2,654,550	\$844,868	\$3,526,000	
Total Former Tronox/Kerr-McGee Facility in Springfield, Missouri Estimated Funding at Beginning of 2023 Budget Year*				\$14,276,000	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.
Estimated Remaining Funds (Post-2023)				\$10,750,000	Initial Funding (2/14/11): \$2,025,323 Anadarko Settlement Funds (2015 and 2016): \$22,657,151 Waterfall Distribution from Sale of Property: \$122,669

¹This 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.