

**2022 Environmental Cost Account (ECA) Budget Forecast for the Former Tronox/Kerr-McGee Facility in Springfield, Missouri**

**Date Submitted: 12/17/21**

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

**Exhibit I**

**Date Approved: 01/25/22**

**Submission to: Missouri Department of Natural Resources on December 17, 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 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 groundwater monitoring and completed the 2020 Annual Groundwater and Corrective Action Report (AGCAR). Implemented field activities in accordance with the Missouri Department of Natural Resources (MoDNR)-approved Greene County Highway Department (GCHD) Site Investigation Work Plan. Prepared the draft GCHD Site Investigation Report. Prepared the Assessment for Soil Sampling at the Northeast and Northwest Stormwater Basins at the request of Greene County and as approved by MoDNR. Prepared the Northwest Stormwater Basin Sampling Field Implementation Work Plan and upon approval from MoDNR, implemented that work. Obtained access agreements for the Off-Facility Site Investigation Work Plan and implemented certain portions of the work plan, including domestic well sampling outreach, sampling and reporting and the continued implementation of the surface water sampling at Woodlawn Spring and Golden Hills Detention Basin. After receipt of MoDNR comments on the draft VI Summary Report, prepared a response to comments matrix, calculated the potential to emit hazardous air pollutants (HAPs) to evaluate the applicability of the need for an air permit, and participated in further discussions with MoDNR. Continued to collect fecal coliform and E.coli samples at Outfall 003, Golden Hills Detention Basin and other locations along West Fork of Spring Branch. Participated in ongoing Beneficiary and stakeholder communications including MoDNR, Greene County, GCHD, City of Springfield, City Utilities, and the public as necessary. Participated in routine project status update meetings. Provided oversight of work performed by City Utilities (natural gas line repair) and the City of Springfield (sewer main repair) to verify that conditions within the work area were not hazardous by providing air monitoring and where necessary, managing spoils. Continued discussions with the City of Springfield with respect to repairing the City-owned lateral connections, slip-lining the sewer main and the trunk line from the Facility discharge point to the manhole. The slip-lining of the sewer main and the trunk line from the Facility discharge point to the manhole were completed in late-March/early-April 2021. The Multistate Trust reimbursed the City of Springfield for the repairs per the funding agreement. Began developing a strategy to remove the Site from the "Critical Sites List" and participated in discussions with the United States.

**Work Planned for 2022:** Perform Site O&M of the Treatment System and compliance monitoring and reporting associated with the MSOP MO-0117331, Wastewater Contribution Permit #720, and the MHWMF Part I Permit. Perform semiannual groundwater monitoring and completed the 2021 AGCAR. Clean onsite DNAPL (as creosote) storage tanks and dispose of contents. Prepare the Wastewater Exemption Rule Technical Memorandum after receipt of comments from MoDNR on a similar memorandum for the Kansas City Owned Funded Site. Submit the GCHD Site Investigation Report to MoDNR, Greene County and GCHD and respond to comments as necessary. Continue implementation of the Off-Facility Investigation Work Plan, including implementation of the surface water sampling at Woodlawn Spring and Golden Hills Detention Basin. Collect additional sewer gas samples from the sewer main in the area near the Facility to assess the affects of the sewer lining and incorporate those results into the final VI Summary Report for MoDNR approval. The budget includes a placeholder allowance of \$25,000 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. Prepare a residential soil incremental sampling methodology (ISM) work plan, implement field activities associated with collection of soil samples from residential properties located adjacent to the Clifton Drainage and prepare a report summarizing the results. Continue maintenance of an environmental relational database to support reporting and corrective measures study (CMS) or equivalent (i.e., remedial action optimization [RAO]/remedial alternative analysis [RAA]). Update the conceptual site model (CSM) using the existing Leapfrog model to support the development of a groundwater model. The groundwater model's domain will be focused on the area near the Treatment System to evaluate the effectiveness of the system, calculate the water balance and evaluate potential remedial alternatives to reduce the long-term O&M costs. Evaluate potential remedial options for the Golden Hills Detention Basin and refine the Class 5 cost estimates to support long-term forecasting and the Critical Sites evaluation. Develop a site-specific website. Participate in ongoing Beneficiary and stakeholder communications including MoDNR, Greene County, GCHD, City of Springfield, City Utilities, and the public as necessary. Participate in routine project status update meetings. Budget includes costs for ongoing discussions with the MoDNR and United States regarding the strategy 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 2021 Approved Budget	Project Costs incurred in 2021 (as of 10/31/2021)	2022 Budget	2022 Scope of Work
XV.A	Regulatory Compliance and Site Operations/Maintenance	\$920,308	\$594,553	\$988,000	Budget includes all (i) planning, groundwater sampling (2 semiannual events [Q2-2022 and Q3-2022] and 2 quarterly groundwater sampling events [Q1-2022 and Q4-2022]) 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 compliance with the Wastewater Discharge Permit #720 and MSOP MO-0117331; (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 waste disposal, and (vi) preparation of the Wastewater Exemption Rule Technical Memorandum. 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."  2022 budget increase is primarily related to quarterly sampling of nine (9) new wells located on GCHD property and six (6) new wells installed as part of the Off-Facility Investigation Work Plan and an increase in Contractor rates.
XV.C	New Environmental Actions	\$2,128,428	\$961,956	\$1,219,550	Budget includes costs to (i) perform contractor project management to oversee the various scopes of work to be performed in 2021, including participation (as necessary) in project-related meetings; (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 Golden Hills Detention Basin, and prepare the Off-Facility Investigation Report; (iii) respond to MoDNR, Greene County and GCHD comments on the GCHD Site Investigation Report; (iv) collect additional sewer gas samples from the sewer main in the area near the Facility to assess the affects of the sewer lining and incorporate those results into the final VI Summary Report for MoDNR approval; (v) prepare a residential soil incremental sampling methodology (ISM) work plan, implement field activities associated with collection of soil samples from residential properties located adjacent to the Clifton Drainage and prepare a report summarizing the results; (vi) a placeholder allowance for considerations for streamlining the AGCAR; (vii) maintenance of an environmental relational database to support reporting and corrective measures study (CMS) or equivalent (i.e., remedial action optimization [RAO]/remedial alternative analysis [RAA]); (viii) update the conceptual site model (CSM) using the existing Leapfrog model to support the development of a groundwater model; (ix) develop a groundwater model with the domain focused on the area near the Treatment System to evaluate the effectiveness of the system, calculate the water balance and evaluate potential remedial alternatives to reduce the long-term O&M costs; (x) evaluate potential remedial options for the Golden Hills Detention Basin; (xi) refined the Class 5 cost estimates to support long-term forecasting; and (xii) develop a site-specific website. The budget includes (i) a placeholder allowance of \$25,000 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 \$75,000 placeholder allowance for on-call technical support provided by various subject matter experts. The budget does not include costs for repairing residential sewer line lateral connections. Once the scope of that work (if any) has been determined, a budget amendment will be submitted.
XV.D	Technical Team/Project Management	\$393,000	\$255,984	\$393,000	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 and expenses for developing the strategy to remove the site from the "Critical Sites List" and for participating in discussions with the Lead Agency and the United States. <sup>1</sup>
XV.E	Project Fees & Expenses	\$39,000	\$2,066	\$16,000	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; and redevelopment planning activities. Budget also includes fees and expenses for developing the strategy to remove the site from the "Critical Sites List" and for participating in discussions with the Lead Agency and the United States. <sup>1</sup>
XV.F	Regulator Oversight Costs	\$35,000	\$3,393	\$35,000	Regulatory oversight cost for Lead Agency
XV.G	Legal Fees and Accounting Fees	\$71,000	\$47,596	\$65,000	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. Budget also includes fees and expenses for developing the strategy to remove the site from the "Critical Sites List" and for participating in discussions with the Lead Agency and the United States. <sup>1</sup>
XV.I	Lease & Property Use (Income & Costs)	\$62,000	\$62,000	\$62,000	Budget assumes no lease revenues in 2022
XV	<b>Total Site 2022 Budget</b>	<b>\$3,524,736</b>	<b>\$1,803,548</b>	<b>\$2,654,550</b>	
<b>Total Former Tronox/Kerr-McGee Facility in Springfield, Missouri Estimated Funding at Beginning of 2022 Budget Year*</b>				<b>\$15,131,000</b>	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.
<b>Estimated Remaining Funds (Post-2022)</b>				<b>\$12,476,450</b>	<b>Initial Funding (2/14/11): \$2,025,323</b> <b>Anadarko Settlement Funds (2015 and 2016): \$22,657,151</b> <b>Waterfall Distribution from Sale of Property: \$122,669</b>

<sup>1</sup>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.

This Single Page Document Constitutes the Annual Budget Submitted to the Lead Agency under Section 3.2.4 of the Multistate Environmental Response Trust Agreement. Supplemental Worksheets, if any, Do Not Comprise a Portion of the Annual Budget.

**Notes:**

<sup>2</sup>Subject to further consultation with its Lead Agencies and the United States, the Multistate Trust currently defines an Owned Funded Site (OFS) as a "Critical Site" if the OFS lacks sufficient Environmental Cost Account (ECA) funds to address one or more of the following criteria or conditions: (i) Known, uncontrolled, unacceptable or potentially unacceptable exposure of human and/or ecological receptors to OFS site contaminants; (ii) Uncontrolled migration of OFS contaminants off-site at concentrations that exceed applicable risk-based criteria; (iii) Unable to characterize the nature and extent of contamination to determine whether there is an unacceptable exposure of human health and the environment to OFS contamination, and to implement protective remedies; and (iv) Potential impacts to drinking water supplies, actual or likely direct human contact and sensitive socioeconomic impacts, including Environmental Justice communities and populations at risk, because the Multistate Trust endeavors to prioritize such OFSs.

Critical Sites need an infusion of funds sufficient to address the above criteria so that an OFS is no longer classified as a Critical Site. Additional funds will likely be necessary to achieve regulatory closure. While many OFSs may lack sufficient funds to achieve final regulatory closure (including long-term stewardship), funding shortfalls in those cases can potentially be addressed by funding receipts from waterfaling funds under the Settlement Agreement and Multistate Trust Agreement, interest income, the sale of property and/or the transfer of such responsibility to a successor to the Multistate Trust.