

2023 Environmental Cost Account (ECA) Budget Forecast for the Kerr-McGee Chemical Corp. Superfund Site in Columbus, Mississippi

Greenfield Environmental Multistate Trust LLC,

Trustee of Multistate Environmental Response Trust (Multistate Trust)

Submittal to: US Environmental Protection Agency (Region 4) on November 23, 2022; Corrected December 1, 2022 (Approved on December 21, 2022)

Date Submitted: 04/14/23

Amended on April 14, 2023

Date Approved: 04/19/23

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

Work Completed in 2022: Continued routine site operation, security, and property maintenance activities; completed semi-annual groundwater monitoring, sampling and reporting activities; submitted revised draft of OU3/OU5 Feasibility Study (FS) per EPA/MDEQ comments and subsequent discussions for EPA approval; completed additional sampling at 2 additional residential properties within OU2, including field collection, data validation, and evaluation activities; continued final grading activities in the Pine Yard (OU1); provided technical and field support to USGS/EPA-led phytoremediation pilot study including groundwater monitoring, soil sampling, and tree measurement and monitoring activities; completed additional planning to support Remedial Action construction of OU2 soils at 2 property with specific resident request to preserve trees and drafted construction completion report; finalized Stormwater Ditch removal action construction completion report; finalized OU1 Remedial Action Completion Report and Addendum; and continued to perform public involvement and community outreach activities by conducting one town hall meeting.

Work Planned for 2023:** Continue routine site operation, security, and property maintenance activities; operation of groundwater recovery and treatment system; semi-annual groundwater monitoring, sampling and reporting; complete draft, revised-draft, and final OU4 FS based on EPA comments on OU3/OU5 FS and submit to EPA and MDEQ for review; complete additional groundwater characterization sampling activities in the Pine Yard to inform the OU4 FS Report; prepare a work plan for the investigation of surface soils in OU3 for engineered soil cover design support; conduct remedial design activities for the former Main Plant Area (OU3/5) based on and pending EPA Record of Decision; provide technical support to EPA in the preparation of the OU3, OU4, and OU5 Proposed Plan and ROD documents; continue field activities to support to USGS/EPA-led phytoremediation pilot study, including ongoing groundwater monitoring, soil sampling, and tree auditing; complete OU1/Pine Yard final seeding and surveying activities; completion of OU2 remedial action construction activities at final property (18-16); complete and finalize OU2 Remedial Action construction completion report; Complete conceptual redevelopment master plan; and continue to perform public involvement and community outreach activities. **Note: Costs to complete any additional draft of the OU3/5 FS are not included.

Work Planned for 2023 1st Amendment: A zero-dollar budget amendment request for scope of work not included in the original budget. The additional scope includes the following tasks: i) evaluate the groundwater treatment system to ensure the DNAPL tank is considered "in-process" meeting the definition of a wastewater treatment unit, in accordance with 40 CFR 260.10; ii) evaluate current regulatory on-site DNAPL storage requirements; sample and profile on-site DNAPL remediation waste; determine regulatory remediation waste disposal and reporting requirements; and prepare a Waste Management Plan for the site, summarizing the regulatory requirements, training, management, documentation, storage, inspection and control of on-site remediation waste streams. There are sufficient funds included in the current 2023 approved budget to perform these additional tasks.

Site Name: Kerr-McGee Chemical Corp. Superfund Site in Columbus, Mississippi (the Site)

Site Location: Columbus, Mississippi

Multistate Trust Site Code: XVI

Cost Center	Cost Center Description	Total 2022 Approved Budget (Includes 1st, 2nd and 3rd Amendments)	Project Costs incurred in 2022	2023 Approved Budget (Approved 12/21/2022)	2023 Amendment	2023 Amended Budget	2023 Scope of Work
XVI.A	Regulatory Compliance and Site Operations/Maintenance	\$789,850	\$422,534	\$1,087,500	\$0	\$1,087,500	Amended for scope of work not included in the original budget, work includes evaluation of the groundwater treatment system to ensure the total fluids tank is considered an in-process wastewater treatment unit. Sufficient funds to perform these tasks are included in the current 2023 approved budget.
XVI.C	New Environmental Actions	\$1,633,300	\$703,716	\$1,907,500	\$0	\$1,907,500	Amended for scope of work not included in the original budget, work includes evaluation of current regulatory requirements; sample and profile on-site DNAPL remediation waste; determine remediation waste disposal and reporting requirements; and prepare a Waste Management Plan for the site, summarizing the regulatory requirements, training, management, documentation, storage, inspection and control of on-site remediation waste streams. Sufficient funds to perform these tasks are included in the current 2023 approved budget.
XVI.D	Technical Team/Project Management	\$442,000	\$320,537	\$393,000	\$0	\$393,000	No change to original scope or budget.
XVI.E	Project Fees & Expenses	\$88,000	\$72,392	\$109,000	\$0	\$109,000	No change to original scope or budget.
XVI.F	Regulator Oversight Costs	\$250,000	\$0	\$250,000	\$0	\$250,000	No change to original scope or budget.
XVI.G	Legal Fees and Accounting Fees	\$147,000	\$98,281	\$151,000	\$0	\$151,000	No change to original scope or budget.
XVI.I	Lease & Property Use (Income & Costs)	\$0	\$0	\$0	\$0	\$0	No change to original scope or budget.
XVI	Total Site ECA Account 2023 Budget	\$3,350,150	\$1,617,460	\$3,898,000	\$0	\$3,898,000	
Total Kerr-McGee Chemical Corp. Superfund Site in Columbus, Mississippi Estimated ECA Account Funding at Beginning of 2023 Budget Year*				\$1,510,000		\$1,510,000	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. NOTE: As of 11/22/2022, the Multistate Trust has not received or accrued oversight costs from the United States for the calendar years 2014 through 2022. These unrecorded costs will result in a reduction in the presented Estimated ECA Account Funding at Beginning of 2023 Budget Year balance when received.
Estimated ECA Account Remaining Funds (Post-2023)				-\$2,388,000		\$15,985,177	Initial ECA Funding (2/14/11): \$2,827,231 Initial SA Funding (2/14/11): \$2,692,871 Anadarko Settlement Funds (2015 and 2016) Received in Anadarko Amount Account (AA): \$67,971,452 Fund transfer from SA to ECA on 10/13/2013: \$538,773 Fund transfer from AA to ECA on 8/11/2015: \$33,244,890; 9/04/2019: \$8,750,600; 4/13/2020: \$8,277,800 Fund transfer from AA to SA on 8/11/2015: \$1,160,252 Waterfall Distribution from Sale of Property in ECA: \$368,008 The Trust has received approval to transfer funds from the Anadarko Amount Subaccount to the Environmental Cost Account to fund Environmental Actions in 2023 during February 2023. This transfer is complete as of March 23, 2023.
Estimated Balance Segregated Amount Subaccount (SA)				\$2,827,970		\$2,827,970	The Trust does not plan to use funds from the SA in 2023.
Estimated Balance Anadarko Amount Subaccount (AA)				\$18,373,177		\$0	The Trust has received approval to transfer funds from the Anadarko Amount Subaccount to the Environmental Cost Account to fund Environmental Actions in 2023 during February 2023. This transfer is complete as of March 23, 2023.
Estimated Balance TOTAL (Post-2023)				\$18,813,147		\$18,813,147	Total all accounts (ECA, SA, and AA)

*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.

