

**2022 Environmental Cost Account (ECA) Budget Forecast for the Kerr-McGee Chemical Corp. Superfund Site in Columbus, Mississippi**

Date Submitted: 07/11/22

Greenfield Environmental Multistate Trust LLC,

Date Approved: 07/14/22

Trustee of Multistate Environmental Response Trust (Multistate Trust)

Submission to: US Environmental Protection Agency (Region 4) on December 1, 2021, Revised December 20, 2021; (Approved on January 12, 2022)

**Amended on July 11, 2022**

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

**Work Planned for 2022:** Continue routine site operation, security, and property maintenance activities; operation of groundwater recovery and treatment system; semi-annual groundwater monitoring, sampling and reporting; Finalize OU-3/OU-5 FS per EPA/MDEQ comments; Complete draft, revised-draft, and final OU-4 FS based on EPA comments on OU-3/OU-5 FS and submit to EPA and MDEQ for review; Provide technical support to EPA in the preparation of the OU-3, OU-4, and OU-5 Proposed Plan and ROD documents; Continue field activities to support to USGS/EPA-led phytoremediation pilot study, including ongoing groundwater monitoring, tree auditing, soil sampling, and installation and operation of irrigation system\*\*; Finalize OU-1 Remedial Action construction completion report submitted in 2020; Complete, if not completed by 2021 year end, final grading construction and surveying activities in OU-1 to support the finalization of the OU-1 remedial action construction completion report; Complete OU-2 Remedial Action of remaining property (property code 18-16) where a determination is imminent for completion activities still required and attain property owner sign-off on 3 properties where construction work is complete, but vegetation was not yet established in 2021; Finalize OU-2 Remedial Action construction completion report; Finalize Stormwater Ditch Removal Action construction completion report submitted in 2021; Complete conceptual redevelopment master plan; and continue to perform public involvement and community outreach activities.

\*\*The 2022 budget includes an allowance for installation and operation of the irrigation system to facilitate completion of this work when detailed instructions and plans are available from USGS. However, the Multistate Trust will not conduct this work until detailed instructions and plans are provided by USGS. Design and procurement of the irrigation system is not included in the 2022 budget as it is the Multistate Trust's understanding that USGS will be completing the design and purchase of the equipment for the irrigation system. A budget amendment will be prepared if costs based on detailed plans exceed the budgetary allowance.

Note:

-There is no remedial design budget included for 2022 at this time, as activities are dependent on EPA's selection of a remedy for OU-3/OU-5 and/or OU-4. If a remedy selection for OU-3/OU-5 and/or OU-4 is made by EPA in 2022, a budget amendment would be submitted after the appropriate level of effort has been evaluated to design the selected remedy.

**Work Planned with 2022 Budget Amendment:** The budget amendment includes costs for previously unbudgeted Multistate Trust accounting and legal teams (including outside counsel) to address contractor plans and issues to ensure continuity of operations at the Site in consultation with the Multistate Trust beneficiaries.

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	2022 Original Budget (Approved 1/12/22)	Committed Costs (As of 6/30/22)	YTD Costs (As of 5/31/22)	Proposed Amendment	Proposed Amended 2022 Budget	2022 Amended Scope of Work
XVI.A	Regulatory Compliance and Site Operations/Maintenance	\$627,500	\$613,412	\$195,143	\$0	\$627,500	No change to original scope or budget anticipated.
XVI.C	New Environmental Actions	\$1,559,500	\$1,433,741	\$499,202	\$0	\$1,559,500	No change to original scope or budget anticipated.
XVI.D	Technical Team/Project Management	\$398,000	\$398,000	\$148,388	\$0	\$398,000	No change to original scope or budget anticipated.
XVI.E	Project Fees & Expenses	\$35,000	\$35,000	\$34,414	\$53,000	\$88,000	The budget amendment includes a higher than anticipated level of effort by the Managing Principal to support EPA and Multistate Trust staff on resolution of the listed waste issue required to finalize the OU3/OU5 feasibility study; assist with preparation of the Columbus annual progress report; and follow-up on contracting plans and continuity of operations matters.
XVI.F	Regulator Oversight Costs	\$250,000	\$250,000	\$0	\$0	\$250,000	No change to original scope or budget anticipated.
XVI.G	Legal Fees and Accounting Fees	\$77,000	\$77,000	\$23,993	\$70,000	\$147,000	The budget amendment includes additional costs for an unanticipated increase in the level of effort by the Multistate Trust legal and accounting team to provide support with contractor issues related to the Site. In addition, the budget amendment includes third-party legal costs to advise the Multistate Trust on unanticipated contractor issues.
XVI.I	Lease & Property Use (Income & Costs)	\$0	\$0	\$0	\$0	\$0	No change to original scope or budget anticipated.
XVI	Total Site ECA Account 2022 Budget	\$2,947,000	\$2,807,153	\$901,140	\$123,000	\$3,070,000	
	Total Kerr-McGee Chemical Corp. Superfund Site in Columbus, Mississippi Estimated ECA Account Funding at Beginning of 2022 Budget Year*	\$3,042,000				\$3,443,719	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.  NOTE: As of 12/1/2021, the Multistate Trust has not received or accrued oversight costs from the United States for the calendar years 2014 through 2021. These unrecorded costs will result in a reduction in the presented Net Trust Assets balance when received.
	Estimated ECA Account Remaining Funds (Post-2022)	\$95,000				\$373,719	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
	Estimated Balance Segregated Amount Subaccount (SA)	\$2,874,640				\$0	The Trust does not plan to use funds from the SA in 2022.
	Estimated Balance Anadarko Amount Subaccount (AA)	\$18,554,580				\$0	The Trust does not plan to use funds from the AA in 2022.
	Estimated Balance TOTAL (Post-2022)	\$21,524,220				\$373,719	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.