

**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); Amended April 14, 2023 (Approved on April 19, 2023)

**Date Submitted: 06/08/23**

**Amended on June 8, 2023**

**Date Approved: 06/26/23**

**Summary of Site Work Planned for 2023:**

**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.

**Work Planned for 2023 2nd Amendment:** Additional costs for the final earthwork grading, topsoil placement, seeding, and survey of final surface grade for OU1 in the Pine Yard. Regrading and restoration of the 18-36 property includes: surveying, topsoil amendment/ seeding, final survey, cleanout of frac tank containing decontamination water, and waste transport and disposal at Waste Management Emelle, Alabama facility. Development and sampling of 3 offsite RP wells located along 14th Ave, and disposal of IDW purge water for additional wells; cleanout, decontamination, confirmatory sampling, data validation and management for the 3 onsite frac tanks; analysis for cVOCs at 4 additional onsite wells (CMW-10, CMW-25, CMW-71 and CMW-79); additional costs for general maintenance: site mowing, vegetation removal and control along the site boundary fence, electrical, plumbing and roof repairs; repairs to groundwater treatment system controls; installation of new air compressor for pneumatic valve controls; expansion of groundwater treatment system secondary containment; installation of process piping and transfer pump for the onsite DNAPL tank; \$30,000 for future contingency for emergency or unanticipated groundwater treatment system maintenance activities. Additional sampling of 22 Pine Yard groundwater monitoring wells and profiling investigative derived wastes for offsite disposal; development and sampling of 13 phytoremediation wells in support of USGS pilot test. Finalization of 14th Avenue Ditch sampling memorandum, including collection and analysis of wet and dry weather samples from 14th avenue ditch; and additional technical support for 2324 7th avenue property data reporting.

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	2023 Current Approved Budget (Amended 4/14/23; Approved)	YTD Costs (as of 3/31/23)	Proposed 2nd Amendment	Proposed Amended 2023 Budget	2023 Scope of Work
XVI.A	Regulatory Compliance and Site Operations/Maintenance	\$1,087,500	\$166,139	\$258,000	\$1,345,500	Budget Amendment 2: Scope includes: (i) development and sampling of 3 offsite RP wells located along 14th Ave, and disposal of IDW purge water for additional wells; (ii) cleanout, decontamination, confirmatory sampling, data validation and management for the 3 onsite frac tanks; (iii) analysis for cVOCs at 4 additional onsite wells (CMW-10, CMW-25, CMW-71 and CMW-79); (iv) additional costs for general maintenance: site mowing, vegetation removal and control along the site boundary fence, electrical, plumbing and roof repairs; (v) repairs to groundwater treatment system controls; (vi) installation of new air compressor for pneumatic valve controls; (vii) expansion of groundwater treatment system secondary containment; (viii) installation of process piping and transfer pump for the onsite DNAPL tank; and (ix) \$30,000 for future contingency for emergency or unanticipated groundwater treatment system maintenance activities.
XVI.C	New Environmental Actions	\$1,907,500	\$107,585	\$352,800	\$2,260,300	Budget Amendment 2: Scope includes: (i) additional costs for the final earthwork grading, topsoil placement, seeding, and survey of final surface grade for OU1 in the Pine Yard; (ii) regrading and restoration of the 18-36 property (includes: surveying, topsoil amendment/ seeding, final survey, cleanout of frac tank containing decontamination water, and waste transport and disposal at Waste Management Emelle, Alabama facility); (iii) additional sampling of 22 Pine Yard groundwater monitoring wells and profiling investigative derived wastes for offsite disposal; (iv) development and sampling of 13 phytoremediation wells in support of USGS pilot test; (v) finalization of 14th Avenue Ditch sampling memorandum, including collection and analysis of wet and dry weather samples from 14th avenue ditch; and (vi) additional technical support for 2324 7th avenue property data reporting.
XVI.D	Technical Team/Project Management	\$393,000	\$67,709	\$36,000	\$429,000	Budget Amendment 2: Additional project management time related to the additional environmental actions including: additional groundwater sampling, groundwater treatment system repairs and modifications, DNAPL disposal, site maintenance activities, and OU1 final grading in the Pine Yard.
XVI.E	Project Fees & Expenses	\$109,000	\$10,631	\$0	\$109,000	No change to original scope or budget.
XVI.F	Regulator Oversight Costs	\$250,000	\$0	\$0	\$250,000	No change to original scope or budget.
XVI.G	Legal Fees and Accounting Fees	\$151,000	\$26,663	\$0	\$151,000	No change to original scope or budget.
XVI.I	Lease & Property Use (Income & Costs)	\$0	\$0	\$0	\$0	No change to original scope or budget.
XVI	Total Site ECA Account 2023 Budget	\$3,898,000	\$378,727	\$646,800	\$4,544,800	
	Total Kerr-McGee Chemical Corp. Superfund Site in Columbus, Mississippi Estimated ECA Account Funding at Beginning of 2023 Budget Year*	\$20,054,000			\$20,054,000	Total funds allocated to the Site per Consent Decree and Environmental Settlement Agreement; less 2011 - 2022 actual costs; plus 2011 - 2022 actual investment activity and other receipts.  NOTE: As of June 8, 2023, 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)	\$16,156,000			\$15,509,200	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 <b>In February 2023, the Trust received approval to transfer funds from the Anadarko Amount Subaccount to the Environmental Cost Account to fund Environmental Actions in 2023. The transfer was completed in March 2023.</b>
	Estimated Balance Segregated Amount Subaccount (SA)	\$2,850,000			\$2,850,000	The Trust does not plan to use funds from the SA in 2023.
	Estimated Balance Anadarko Amount Subaccount (AA)	\$0			\$0	<b>In February 2023, the Trust received approval to transfer funds from the Anadarko Amount Subaccount to the Environmental Cost Account to fund Environmental Actions in 2023. The transfer was completed in March 2023.</b>
	Estimated Balance TOTAL (Post-2023)	\$19,006,000			\$18,359,200	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.

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.