

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

Date Submitted: 12/05/22

Greenfield Environmental Multistate Trust LLC,

Date Approved: 12/13/22

Trustee of Multistate Environmental Response Trust (Multistate Trust)

Submittal to: US Environmental Protection Agency (Region 4) on December 1, 2021, Revised December 20, 2021 (Approved on January 12, 2022); 1st Amendment Submitted July 11, 2022 (Approved on July 14, 2022); 2nd Amendment Submitted on August 15, 2022 (Approved August 17, 2022)

Amended on December 5, 2022

Summary of Site Work 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 Associated with 1st 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.

Work Associated with 2nd 2022 Budget Amendment: The budget amendment includes: greater than anticipated laboratory costs for sample analyses including required analytes to profile investigation-derived waste and recovered nonaqueous-phase liquid (NAPL); an updated cost estimate for the transport and disposal of the recovered NAPL based on a clearer understanding of disposal requirements; greater than anticipated reporting costs for groundwater sample data to ensure comprehensive reporting of chlorinated volatile organic compounds; and costs for soil and sediment sampling not anticipated with the original 2022 budget submittal, specifically: 706 Moss Street, 1515 27th Street North, the Johnston Tombigbee Furniture property, and the 14th Avenue Ditch.

Work Associated with 3rd 2022 Budget Amendment: Additional 2022 project management and technical oversight time includes: Review and coordination of additional sampling requests for two additional off-site properties and sediment sampling in 14th Avenue ditch; Review of OU2 construction to date, institutional controls, arborist coordination, property owner coordination, additional contractor coordination, to determine a path forward on the OU2 property 18-16; Site visit needed to evaluate continuity of operations requirements for the ongoing routine environmental actions at the site.

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 Budget (Includes 1st and 2nd Amendments)	Committed Costs (As of 10/31/22)	YTD Costs (As of 10/31/22)	Proposed 3rd Amendment	Proposed Amended 2022 Budget	2022 Amended Scope of Work
XVI.A	Regulatory Compliance and Site Operations/Maintenance	\$789,850	\$655,278	\$446,191	\$0	\$789,850	No change to original scope or budget anticipated.
XVI.C	New Environmental Actions	\$1,633,300	\$1,523,741	\$745,470	\$0	\$1,633,300	No change to original scope or budget anticipated.
XVI.D	Technical Team/Project Management	\$398,000	\$398,000	\$349,181	\$44,000	\$442,000	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 and coordination with environmental contractors, project controls, project communications, financial management, beneficiary communications, quality assurance/quality control, and contract management. Budget also includes implementation of community outreach and engagement efforts, facilitation of community meetings, and redevelopment planning activities. The 2022 Cost Center C budget scope also includes limited carry-over of remedial action construction management activities from 2021, specifically: completion of OU2 remedial action construction activities; completion of OU-1/Pine Yard final grading and surveying activities; finalization of Construction Completion Reports for the OU-1 Remedial Action, Stormwater Ditch Removal Action, and OU-2 Remedial Action. 3rd Amendment: Additional 2022 project management and technical oversight time includes: Review and coordination of additional sampling requests for two additional off-site properties and sediment sampling in 14th Avenue ditch; Review of OU2 construction to date, institutional controls, arborist coordination, property owner coordination, additional contractor coordination, to determine a path forward on the OU2 property 18-16; Site visit needed to evaluate continuity of operations requirements for the ongoing routine environmental actions at the site.
XVI.E	Project Fees & Expenses	\$88,000	\$88,000	\$59,949	\$0	\$88,000	No change to original scope or budget anticipated.
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	\$147,000	\$147,000	\$104,341	\$0	\$147,000	No change to original scope or budget anticipated.
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	\$3,306,150	\$3,062,019	\$1,705,132	\$44,000	\$3,350,150	
	Total Kerr-McGee Chemical Corp. Superfund Site in Columbus, Mississippi Estimated ECA Account Funding at Beginning of 2022 Budget Year*	\$3,443,719				\$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 Estimated Funding at Beginning of 2022 Budget Year balance when received.
	Estimated ECA Account Remaining Funds (Post-2022)	\$137,569				\$93,569	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)	\$2,845,357				\$2,845,357	The Trust does not plan to use funds from the SA in 2022.
	Estimated Balance Anadarko Amount Subaccount (AA)	\$18,436,691				\$18,436,691	The Trust does not plan to use funds from the AA in 2022.
	Estimated Balance TOTAL (Post-2022)	\$21,419,617				\$21,375,617	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.