

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

**Date Submitted: 12/01/21**

**Date Approved: 01/12/22**

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

**Exhibit I**

**Submission to: US Environmental Protection Agency (Region 4) on December 1, 2021; Revised December 20, 2021**

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

Due to projected long-term funding limitations for the Site, the Multistate Trust recommends prioritization be given in 2022 to the tasks associated with the OU-3/OU-5 FS and the preparation of the OU-4 FS to enable efficient and expedient transition to remedial design and remedial action for OU-3/OU-5 and OU-4 as soon as possible.

**Work Completed in 2021:** Continued routine site operation, security, and property maintenance activities; completed design and installation of replacement conveyance piping for the continued operation of groundwater recovery and treatment system; Completed semi-annual groundwater monitoring, sampling and reporting activities; Submitted revised draft of OU-3/OU-5 FS per EPA/MDEQ comments and subsequent discussions; Completed additional sampling to support OU-2 soil Remedial Action, including field, data validation, and evaluation activities; Provided technical and field support to USGS/EPA-led phytoremediation pilot study including groundwater monitoring activities and tree procurement and planting; Completed Remedial Action construction of OU-2 soils at 9 properties per the EPA-approved OU-2 Remedial Action Work Plan and drafted construction completion report; Completed removal action in storm drainage ditches between 14th Ave N. and Waterworks Rd per EPA TCAM and drafted construction completion report; Conducted final grading construction activities within OU-1; and continued to perform public involvement and community outreach activities by conducting two virtual town hall meetings and distributing one newsletter.

**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.

**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 2021 Approved Budget	Project Costs incurred in 2021 (as of 11/30/2021)	2022 Budget	2022 Scope of Work
XVI.A	Regulatory Compliance and Site Operations/Maintenance	\$807,000	\$519,167	\$627,500	2022 Cost Center A Budget scope includes: general property operations and maintenance, semi-annual groundwater compliance sampling and reporting, groundwater recovery and treatment system operation and permit compliance, disposal of remediation waste, property utility fees, and \$30,000 allowance for unforeseen potential groundwater recovery and treatment system repairs.
XVI.C	New Environmental Actions	\$8,496,000	\$4,969,026	\$1,559,500	Due to projected long-term funding limitations for the Site, the Multistate Trust recommends prioritization be given in 2022 to the tasks associated with the OU-3/OU-5 FS and the preparation of the OU-4 FS to enable efficient and expedient transition to remedial design and remedial action for OU-3/OU-5 and OU-4 as soon as possible.  2022 Cost Center C budget scope includes: response to 1 set of EPA/MDEQ comments and finalization of the draft OU-3/OU-5 FS Report; preparation and submittal of the draft, revised-draft, and final OU-4 FS Report; technical support to EPA in the preparation of OU-3, OU-4, and OU-5 Proposed Plan and ROD documents; field activities to support USGS/EPA phytoremediation pilot study, including groundwater monitoring, soil sampling, and a budgetary allowance for installation and operation of irrigation system; additional groundwater sampling and characterization in Pine Yard to inform the OU-4 FS Report; completion of draft redevelopment conceptual master plan; and technical support for ongoing public involvement and outreach activities. The 2022 Cost Center C budget scope also includes limited carry-over of remedial action construction activities from 2021, specifically: completion of OU-2 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.  Note: 2022 Cost Center C budget does not include costs for remedial design, as design 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.
XVI.D	Technical Team/Project Management	\$456,000	\$374,326	\$398,000	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.  Note: 2022 Cost Center D budget does not include costs for remedial design, as design 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.
XVI.E	Project Fees & Expenses	\$77,000	\$22,565	\$35,000	Budget includes Managing Principal time 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.
XVI.F	Regulator Oversight Costs	\$250,000	\$0	\$250,000	Budget assumes EPA and MDEQ oversight.
XVI.G	Legal Fees and Accounting Fees	\$129,000	\$58,075	\$77,000	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.
XVI.I	Lease & Property Use (Income & Costs)	\$0	\$0	\$0	Budget assumes no lease revenues in 2022
XVI	Total Site ECA Account 2022 Budget	\$10,215,000	\$5,943,159	\$2,947,000	
	Total Kerr-McGee Chemical Corp. Superfund Site in Columbus, Mississippi Estimated ECA Account Funding at Beginning of 2022 Budget Year*			\$3,042,000	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	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	The Trust does not plan to use funds from the SA in 2022.
	Estimated Balance Anadarko Amount Subaccount (AA)			\$18,554,580	The Trust does not plan to use funds from the AA in 2022.
	Estimated Balance TOTAL (Post-2022)			\$21,524,220	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.