

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

Date Submitted: 11/26/21

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

Exhibit I

Date Approved: 12/20/21

Submittal to: US Environmental Protection Agency (Region 4) on November 26, 2021

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

Work Completed in 2021: Continued post-closure care of closed hazardous waste impoundment and ongoing groundwater monitoring in spring 2021; submitted Class II Permit Modification request to MDEQ to suspend the groundwater monitoring and sampling requirements*; performed site security and routine maintenance activities; completed and submitted HHRA and BERA reports for EPA and MDEQ review and approval; began preparing draft CMS report for the Facility based on comments received from EPA and MDEQ on the Non-Process Area draft CMS report submitted to EPA and MDEQ in 2020; Project management and regular communication with EPA and MDEQ.

*Note: Only spring groundwater sampling and monitoring activities were completed at the Facility.

Work Planned for 2022: Continue post-closure care of closed hazardous waste impoundment**; perform site security and routine maintenance; complete 2021 groundwater monitoring compliance report; complete preparation of draft and final Corrective Measures Study report for EPA and MDEQ review and approval; Project management and regular communication with EPA and MDEQ; and community outreach and redevelopment initiatives.

**Note: Currently the 2022 budget does not include costs to complete the semi-annual groundwater compliance sampling and monitoring pending MDEQ's decision on the Class II Permit Modification request for the post-closure permit obligations.

Site Name: Kerr-McGee Chemical Corp. Facility in Meridian, Mississippi (the Site)

Site Location: Meridian, Mississippi

Multistate Trust Site Code: XVIII

Cost Center	Cost Center Description	Total 2021 Approved Budget	Project Costs incurred in 2021 (as of 9/30/2021)	2022 Budget	2022 Scope of Work
XVIII.A	Regulatory Compliance and Site Operations/Maintenance	\$195,000	\$119,264	\$165,000	2022 Cost Center A budget includes: regulatory compliance inspections and reporting for RCRA post-closure care of closed impoundment and general site operation, maintenance, and security activities. Groundwater compliance monitoring and sampling activities are not included in 2022 due to the anticipated suspension of the groundwater monitoring requirements under the RCRA Post-Closure Care Permit by MDEQ in Q4 2021.
XVIII.C	New Environmental Actions	\$1,106,000	\$332,363	\$508,000	2022 Cost Center C Budget includes: preparation and submittal of draft and final Corrective Measures Study (CMS) Report for EPA/MDEQ review and comment; allowances for potential groundwater monitoring program evaluation and/or wetland delineation to support CMS, where required; implementation of Community Involvement Plan; strategic planning and all consultant project management (meetings, progress reporting, schedule and financial management).
XVIII.D	Technical Team/Project Management	\$151,000	\$45,222	\$165,000	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 environmental contractors, project controls, project communications, financial management, beneficiary communications, community involvement, quality assurance/quality control, and contract management.
XVIII.E	Project Fees & Expenses	\$22,000	\$0	\$20,000	Budget includes Managing Principal time and expenses for: oversight and approval of technical strategy and Environmental Actions; beneficiary communications; support for beneficiary community involvement; key stakeholder communications; Settlement Agreement matters; budget submittals; redevelopment planning activities.
XVIII.F	Regulator Oversight Costs	\$50,000	\$0	\$50,000	Placeholder estimates for MDEQ oversight costs.
XVIII.G	Legal Fees and Accounting Fees	\$80,000	\$9,257	\$45,000	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, work associated with deed restrictions and Site closure and other legal affairs. The budget also includes costs for financial services, including accounting, bookkeeping, financial reporting, invoice processing, budget preparation, and budget tracking.
XVIII.I	Lease & Property Use (Income & Costs)	\$0	\$3,850	\$0	Budget assumes no lease revenues in 2022.
XVIII	Total Site 2022 Budget	\$1,604,000	\$502,256	\$953,000	
	Total Kerr-McGee Chemical Corp. Facility in Meridian, Mississippi Estimated Funding at Beginning of 2022 Budget Year*			\$19,954,000	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.
	Estimated Remaining Funds (Post-2022)			\$19,001,000	Initial Funding (2/14/11): \$1,298,956 Anadarko Settlement Funds (2015 and 2016): \$22,657,151 Waterfall Distribution from Sale of Property: \$122,669

*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.