

**2024 Environmental Cost Account (ECA) Budget Forecast for the Kerr-McGee Chemical Corp Superfund Site in Soda Springs, Idaho**

**Date Submitted: 12/11/2023**

Greenfield Environmental Multistate Trust LLC,

**Exhibit I**

**Date Approved: 12/19/2023**

Trustee of Multistate Environmental Response Trust (collectively, the Multistate Trust)

Submittal to: United States Environmental Protection Agency (Region 10) on December 11, 2023

Summary of Site Work Completed in 2023 and Planned for 2024:

**Work Completed in 2023:** Supported EPA's preparation and finalization of the Proposed Plan (March 2023) and ROD Amendment (expected fall 2023). Prepared and submitted a petition for an Area of Drilling Concern (ADC) to the Idaho Department of Water Resources (IDWR), and supported public hearing regarding the ADC. Prepared Bulk Sampling & Aquifer Test Plan, Treatability Study Pilot Test Work Plan, and Bench & Column Studies Plan; began implementation of these plans, including well installations, sample collection, and testing to evaluate in-situ and ex-situ groundwater treatment design considerations. Participated in public outreach and public engagement activities, including: preparation of 2 fact sheets, attended two public hearings (Proposed Plan, and ADC), and maintained project website. Conducted routine site operations, maintenance and regulatory compliance activities, including Site caretaking, repository leachate management, monthly inspections and reporting, annual LTM sampling and reporting.

**Work Planned for 2024:** Continue implementation of the Treatability Study Pilot Test, including design, implementation, and monitoring of field trials for in-situ and ex-situ groundwater treatment, and subsequent design of expansion of the initial Pilot Test treatment area(s) for full scale remedy implementation. Continue to support the 2023 petition to IDWR for the establishment of an ADC as an off-site institutional control on groundwater exposure. Complete on-site institutional controls for land and groundwater use limitations. Participate in public outreach and public engagement activities, including: fact sheet preparation and distributions, organizing and holding public meeting(s), and maintaining project website. Perform routine site operations, maintenance and regulatory compliance activities, including Site caretaking, repository leachate management, monthly inspections and reporting, annual LTM sampling and reporting. Participate in technical project update meetings with EPA/IDWR and status meetings with the City of Soda Springs. No construction costs are included in 2024; if construction is desired, a budget amendment will be requested.

Site Name: Kerr-McGee Chemical Corp Superfund Site in Soda Springs, Idaho (the Site)

Site Location: Soda Springs, Idaho

Multistate Trust Site Code: VII

Cost Center	Cost Center Description	Total 2023 Approved Budget	Project Costs incurred in 2023 (as of 9/30/2023)	2024 Budget	2024 Scope of Work
VII.A	Regulatory Compliance and Site Operations/Maintenance	\$404,000	\$281,848	\$634,000	Routine site operations, maintenance and regulatory compliance activities, including monthly inspections, ongoing Site maintenance, repository leachate management, and monthly reporting. Includes pumping and disposal of leachate from both on-Site landfills/repositories. Includes annual LTM sampling, analytical costs, and annual LTM reporting. LTM sampling locations increased from 123 groundwater sample locations to 189 sample locations in 2024 due to increased sampling planned once every three years. The Site LTM Plan will be updated to reflect changes in LTM resulting from 2024 LTM results. Includes \$13k to obtain new performance bond for monitoring wells located on City of Soda Springs property - to maintain compliance with access agreement. Includes data validation and database management for newly collected data. Includes fire break maintenance, weed spraying, and Site mowing. Includes all Site utilities. Includes \$50k placeholder for response to unplanned events. Increased costs from 2023 due to increased laboratory analytical unit rates, increase LTM sampling of from 123 to 189 groundwater monitoring locations for '3-year' LTM event, and increased repository leachate management costs expected in 2024 based on 2023 costs incurred.
VII.C	New Environmental Actions	\$2,549,000	\$972,749	\$2,348,000	Implement Treatability Study Pilot Test Work Plan, including performing Bench and Column Study activities and baseline monitoring of wells installed in 2023, prepare Field Trials Work Plan, and begin field trials for in-situ and ex-situ groundwater treatment remedial design support. Support IDWR in the establishment of an Area of Drilling Concern, including associated public meetings / site visits. Prepare environmental covenants package to emplace institutional controls for on-Site land and groundwater use. Update and maintain project website. Perform data validation and data management for all newly collected data. Project costs in 2023 below budget due to field trials schedule changing from 2023 to 2024. The 2nd Record of Decision Amendment is anticipated to be issued by EPA in the fall of 2023; therefore, no budget has been included for decision document activities.
VII.D	Technical Team/Project Management	\$321,000	\$126,422	\$320,000	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. Budget also includes fees for preparation of Multistate Trust Annual Progress Report.
VII.E	Project Fees & Expenses	\$39,000	\$3,229	\$32,000	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; and preparation of Multistate Trust Annual Progress Report.
VII.F	Regulator Oversight Costs	\$500,000	\$84,259	\$500,000	Placeholder budget for lead and non-lead agency oversight costs.
VII.G	Legal Fees and Accounting Fees	\$112,000	\$17,833	\$107,000	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. Includes legal support for the establishment of on- and off-Site institutional controls and a \$25k allowance for outside counsel support on Idaho water rights issues. Budget includes costs for financial services, including accounting, bookkeeping, financial reporting, invoice processing, budget preparation, and budget tracking. Budget also includes costs for legal and financial affairs support in preparation of Multistate Trust Annual Progress Report.
VII.I	Lease & Property Use (Income & Costs)	\$0	\$1,297	\$0	Projected revenue from the existing lease agreement is not a material source of projected site revenue and, as a result, is not included in this line item.
VII	Total Site 2024 Budget	\$3,925,000	\$1,485,043	\$3,941,000	
Total Kerr-McGee Chemical Corp Superfund Site in Soda Springs, Idaho Estimated Funding at Beginning of 2024 Budget Year*				\$71,403,000	Total funds allocated to the Site per Consent Decree and Environmental Settlement Agreement; less 2011 - 2022 actual and 2023 estimated costs; plus 2011 - 2022 actual and 2023 estimated investment activity and other receipts.
Estimated Remaining Funds (Post-2024)				\$67,462,000	Initial Funding (2/14/11): \$6,050,929 Anadarko Settlement Funds (2015 and 2016): \$90,628,603 Waterfall Distribution from Sale of Property: \$490,678 Other Property Sales: \$1,500

\*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.