

2024 Environmental Cost Account (ECA) Budget Forecast for the Former Tronox/Kerr-McGee Facility in Springfield, Missouri ¹

Date Submitted: 12/28/2023

Date Approved: 1/9/2024

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

Exhibit 1

Submittal to Missouri Department of Natural Resources on December 28, 2023

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

Work Completed in 2023: Performed operations and maintenance (O&M) of the groundwater and product treatment system (Treatment System) to maintain compliance with the Missouri Hazardous Waste Management Facility (MHWMF) Part I Permit (Missouri Department of Natural Resources [MoDNR]-approved including the Sampling and Analysis Plan [SAP]/Quality Assurance Project Plan [QAPP]), Missouri State Operating Permit (MSOP) MO-0117331, and Wastewater Contribution Permit #720. Performed compliance sampling, monitoring, and reporting associated with the Wastewater Discharge Permit, MSOP MO-0117331, and MHWMF Part I Permit including quarterly (where applicable) and semiannual groundwater monitoring. Submitted the 2022 Annual Groundwater and Corrective Action Report (AGCAR) to the MoDNR. Began preparing the 2023 AGCAR for submittal to MoDNR by March 1, 2024. Prepared and submitted the permit renewal application for MSOP MO-0117331. Continued implementing the Off-Facility Investigation Work Plan (OFIWP), including surface water sampling at Woodlawn Spring and Golden Hills Detention Basin (GHDB), public water supply sampling, domestic (private) well sampling, and associated reporting tasks. Installed transducers in groundwater monitoring wells to further assess hydraulics along Clifton Drainage. Completed field and reporting activities for four of seven properties in accordance with the MoDNR-approved Residential Yards ISM Work Plan. Performed soil-, seep water- and outdoor air-sampling as requested by residents and pursuant to the Residential Property Sampling Plan. Performed vapor intrusion (VI) sampling as requested by residents. Collected additional sewer water and sewer gas samples from the City of Springfield's sewer main in the area near the Facility to assess the effects of the sewer lining (results will be incorporated into a future technical memorandum). Performed environmental relational database maintenance and management. The Multistate Trust received the preliminary draft GHDB Site Characterization and Pre-Design Investigation Work Plan (i.e., work plan to support investigation and design activities associated with implementing a revised management plan option for the basin) for initial review in late-Q4. Completed the Residential Sewer Lateral Field Implementation Plan for installing ±50 residential sewer laterals. Hosted two community meetings (including all preparation activities, media interviews, and venue fees). Prepared and distributed informational materials to ±2,000 addresses (e.g., fact sheets, press releases and advertisements). Participated in one-on-one meetings with residents. Performed domestic well sampling and reporting. Performed on-going environmental relational database maintenance and management. Prepared the Multistate Trust's 2022 Annual Progress Report (portion specific to the Site). On February 7, 2023, the Multistate Trust submitted its "Proposed Unfunded Critical Need Determination" to its beneficiaries stating that the Owned Funded Site (OFS) in Springfield, MO is an OFS with an Unfunded Critical Need as described in the draft Third Amendment to the Settlement Agreement.

Work Planned for 2024: Perform O&M of the Treatment System to maintain compliance with the MHWMF Part I Permit (including the MoDNR-approved SAP/QAPP), MSOP MO-0117331, and Wastewater Contribution Permit #720. Perform compliance sampling, monitoring, and reporting associated with the Wastewater Discharge Permit, MSOP MO-0117331, and MHWMF Part I Permit including quarterly (where applicable) and semiannual groundwater monitoring. Finalize and submit the 2023 AGCAR to the MoDNR by March 1, 2024. Finalize the Wastewater Exemption Rule technical memorandum. Prepare and submit BNSF Railway Company access renewal application. Continue implementing the OFIWP, including surface water sampling at Woodlawn Spring and GHDB, public water supply sampling, groundwater monitoring well installation, and associated reporting tasks. Complete ISM sampling and reporting activities for three remaining properties in accordance with the MoDNR-approved Residential Yards ISM Work Plan. Perform soil-, seep water- and outdoor air-sampling as requested by residents and pursuant to the Residential Property Sampling Plan. Perform VI sampling as requested by residents. Continue collecting sewer water and sewer gas samples from the City of Springfield's sewer main in the area near the Facility to assess the effects of the sewer lining (results will be incorporated into a future technical memorandum). Maintain the site's environmental relational database. Finalize the GHDB Site Characterization and Pre-Design Investigation Work Plan for submittal to and approval by MoDNR. Once approved, implement the field work and prepare a brief technical memorandum summarizing the results (budget includes a \$200,000 placeholder allowance). Prepare 60% design for the GHDB revised management option, including wetland modeling, engineering drawings and specifications, and design basis report. Replace up to ±50 residential sewer laterals. Host up to two community meetings (including all preparation activities, media interviews and venue fees). Prepare and distribute informational materials to ±2,000 addresses (e.g., fact sheets, press releases and advertisements). Budget also includes: (i) a \$250,000 placeholder allowance to prepare the High Street Soil Sampling Work Plan, collect soil samples at residential properties adjacent to High Street north of the Facility and prepare the investigation report, along with letters to residents conveying results; (ii) a \$50,000 placeholder allowance for an unplanned and/or emergency events; (iii) a \$25,000 placeholder allowance for unplanned events related to the City of Springfield and City Utilities work within the "High Profile List Area"; (iv) environmental relational database maintenance and management; (v) on-call subject matter expertise (SME) support; and (vi) hosting a site reuse planning workshop. Prepare the Multistate Trust's 2023 Annual Progress Report (portion specific to the site).

Site Name: Former Tronox/Kerr-McGee Facility in Springfield, Missouri (the Site)

Site Location: Springfield, Missouri

Multistate Trust Site Code: XV

Cost Center	Cost Center Description	Total 2023 Approved Budget (Proposed Amended 2023 Budget)	Project Costs incurred in 2023 (as of 9/30/2023)	2024 Budget	2024 Scope of Work
XV.A	Regulatory Compliance and Site Operations/Maintenance	\$924,000	\$580,822	\$1,027,000	Budget includes (i) planning, groundwater sampling and reporting (i.e., 2023 Annual Ground Corrective Action Report [AGCAR] due March 1, 2024) in accordance with the MHWMF Part I Permit, and the MoDNR-approved SAP/QAPP; (ii) sampling, monitoring, and reporting activities in accordance with the Wastewater Discharge Permit #720 and MSOP MO-0117331; (iii) BNSF Railway Company access renewal application fees; (iv) annual Blanket Railroad Protective Liability Insurance Policy and access fee; (v) O&M of the Treatment System to maintain compliance with the MHWMF Part I Permit, MSOP MO-0117331, and Wastewater Contribution Permit #720; (vi) mowing and site security; (vii) finalizing the Wastewater Exemption Rule technical memorandum; (viii) MSOP Permit (NPDES) annual fee; and (ix) other well access fees. Budget also includes utilities to operate the Treatment System. In addition, the budget includes a \$50,000 placeholder allowance for an unplanned and/or emergency events and a \$25,000 placeholder allowance for unplanned events related to the City of Springfield and City Utilities work within the "High Profile List Area." Utilities, laboratory charges and other routine O&M budgets have been estimated to account for potential rate adjustments due to inflation. The Multistate Trust will monitor actual costs incurred and impacts to the 2024 ECA budget and if necessary, submit a budget amendment.
XV.C	New Environmental Actions	\$2,160,000	\$751,908	\$3,287,000	Budget includes: (i) community engagement (including maintenance and annual fees associated with the site-specific website; mailing service and postage for flyers and other information to ±2,000 addresses; venue rental fees, press releases/advertisements, and Multistate Trust's local third-party local contractor support as needed) for up to two community meetings; (ii) continued implementation of field activities in accordance with the MoDNR-approved OFIWP and preparation and submittal of the associated reports including, surface water sampling at Woodlawn Spring and GHDB, public water supply sampling, and groundwater monitoring well installation (access for monitoring wells is anticipated at a new location in 2024); (iii) continued sewer gas / sewer water sample collection from the City of Springfield's sewer main in the area near the Facility; (iv) continued implementation of field activities at residential properties located adjacent to the Clifton Drainage per the MoDNR-approved ISM Work Plan, including preparing final resident letters and reporting; (v) potential soil-, seep water- and outdoor air-sampling as requested and pursuant to the Residential Property Sampling Plan; (vi) perform VI sampling; (vii) finalization of the GHDB Characterization and Pre-Design Investigation Work Plan for review and approval by MoDNR; (viii) a placeholder allowance of \$200,000 to implement the field work and reporting associated with the GHDB Characterization and Pre-Design Investigation Work Plan; (ix) and GHDB 60% design, including wetland modeling, engineering drawings and specifications, and a design basis report; and (x) a placeholder allowance of \$250,000 to prepare the High Street Soil Sampling Work Plan, collect soil samples at residential properties adjacent to High Street north of the Facility and prepare the investigation report, along with letters to residents conveying results. The budget also includes: (i) replacement of ±50 residential sewer laterals; (iii) environmental relational database maintenance and management; and (iv) on-call SME support, as needed.
XV.D	Technical Team/Project Management	\$379,000	\$238,017	\$420,000	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 engagement, quality assurance/quality control, contract management and facilitating site reuse. Budget also includes fees for preparing the Multistate Trust 2023 Annual Progress Report.
XV.E	Project Fees & Expenses	\$17,000	\$4,804	\$17,000	Budget includes Managing Principal time and expenses for: oversight and approval of technical strategy and Environmental Actions; beneficiary communications; support for beneficiary and community engagement; key stakeholder communications; policy matters; Settlement and Trust Agreement matters; redevelopment planning activities; and preparing the Multistate Trust 2023 Annual Progress Report.
XV.F	Regulator Oversight Costs	\$35,000	\$4,048	\$35,000	Regulatory oversight costs for lead agency.
XV.G	Legal Fees and Accounting Fees	\$73,000	\$39,210	\$73,000	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. 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 to prepare the Multistate Trust 2023 Annual Progress Report.
XV.I	Lease & Property Use (Income & Costs)	\$62,000	\$46,500	\$62,000	Budget lease revenues anticipated in 2024.
XV	Total Site 2024 Budget	\$3,526,000	\$1,572,310	\$4,797,000	
Total Former Tronox/Kerr-McGee Facility in Springfield, Missouri Estimated Funding at Beginning of 2024 Budget Year*				\$12,187,000	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)				\$7,390,000	Initial Funding (2/14/11): \$2,025,323 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.
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.

Notes:
¹The Multistate Trust has determined that this Owned Funded Site (OFS) is a site with an Unfunded Critical Need. Pursuant to the draft Third Amendment to the Settlement Agreement, an "Unfunded Critical Need" shall mean a Trust's inability, because of insufficient funding in a Trust Site's Environmental Cost Account or Work Account, (i) to control or mitigate (including performance of operation and maintenance activities as part of such control or mitigation) ongoing human exposures or an imminent threat of human exposures to hazardous substances, hazardous wastes, contaminants, or pollutants, on or from the Site, at concentrations that exceed levels protective of human health under applicable criteria established by relevant government agencies, or (ii) to characterize the Site adequately to determine whether such exposures or imminent threat of exposures exists.