

**2024 Environmental Cost Account (ECA) Budget Forecast for the Calhoun Remediation Site**

**Date Submitted: 12/20/2023**  
**Date Approved: 03/28/2024**

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

[Exhibit 1](#)

**Submission to: Louisiana Department of Environmental Quality on December 20, 2023**

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

**Work Completed in 2023:** Performed operation and maintenance, including system repairs to the onsite groundwater treatment system (GWTS) to protect the adjacent creek. Performed compliance monitoring and reporting (i.e., biannual corrective action groundwater sampling and submittal of two reports; and discharge monitoring and quarterly reporting). Prepared the Additional Site Investigation (ASI) Work Plan and submitted (in October) to LDEQ for review and approval. Began field planning efforts, including but not limited to procurement and document (e.g., field instructions) activities, to implement the ASI activities recommended in the 2023 Calhoun Gas Plant Site Source ASI Report and 2023 ASI Work Plan necessary to investigate the Calhoun Gas Plant property (i.e., Non Owned Other Site - Calhoun Facility, also known as the Regency Gas Plant property) as a potential upgradient source. Note that costs associated with the Non Owned Other Site - Calhoun Facility are not billed to the Owned Funded Site - Calhoun Remediation Site's Environmental Cost Account (ECA) and instead are billed to the Non Owned Other Site's cost account. Prepared Multistate Trust 2022 Annual Progress Report.

**Work Planned for 2024:** Perform operation and maintenance, including system repairs to the onsite groundwater treatment system to protect the adjacent creek. Perform site maintenance, operations, compliance monitoring and reporting (biannual corrective action groundwater sampling/reporting and monthly surface water discharge monitoring/reporting). Complete one Site-wide groundwater sampling event to inform the Non Owned Other Site source investigation in accordance with 2023 ASI Work Plan, and based on the combined results, update the overall site-wide remediation strategy, inclusive of both the Calhoun Remediation Site and the Non Owned Other Site - Calhoun Facility. This sampling event is anticipated to close out remaining data gaps for the Calhoun Remediation Site and to finalize understanding of nature and extent of contamination as basis for the Risk Evaluation / Corrective Action Program (RECAP) evaluation. Based on the overall schedule to complete the 2024 proposed activities, a budget amendment may be submitted to prepare the corrective action plan (CAP) and begin designing the final remedy. Note that while combined reports will be prepared, the costs associated with the Owned Funded Site - Calhoun Remediation Site are not billed to the Non-Owned Other Site - Calhoun Facility's cost account and instead are billed to the Owned Funded Site's ECA. Prepare the Multistate Trust 2023 Annual Progress Report (portion specific to the Site).

**Site Name: Calhoun Remediation Site (the Site)**

**Site Location: Calhoun, Louisiana**

**Multistate Trust Site Code: XIII**

Cost Center	Cost Center Description	Total 2023 Approved Budget	Project Costs incurred in 2023 (as of 10/31/2023)	2024 Budget	2024 Scope of Work
XIII.A	Regulatory Compliance and Site Operations/Maintenance	\$753,500	\$427,417	\$797,500	Budget includes costs to: (i) perform ongoing O&M of the GWTS, mowing, Site security inspections, and emergency Site visits/inspections, as necessary; (ii) perform semiannual surface water and groundwater quality monitoring, depth to water gaging, and LNAPL monitoring; (iii) prepare Second Half 2023 and First Half 2024 Biannual CARs and submit to LDEQ; (iv) pursuant to the requirements of the LPDES Permit, collect quarterly effluent samples at Outfall 001 and submit quarterly DMRs; (v) transportation and disposal of routine waste and iron filter cake from operation of the GWTS filter press; (vi) prepare and submit the Industrial SWGAR to LDEQ; (vii) a placeholder allowance of \$50,000 for unplanned events or emergency response; and (viii) a placeholder allowance of \$32,000 for the LDEQ Groundwater Protection Fee, OR-1 fee, and UIC well repermit fee.
XIII.C	New Environmental Actions	\$271,000	\$2,920	\$161,700	Budget includes costs to: (i) complete the ASI fieldwork to finalize understanding of nature and extent of contamination for both the Calhoun Remediation Site and the Non Owned Other Site - Calhoun Facility (Regency Gas property) in accordance with ASI Work Plan submitted to LDEQ in October 2023 (LDEQ approval pending); (ii) update overall CSM based on the ASI and available data; (iii) complete the ASI Report; and (iv) complete the RECAP evaluation. Based on the overall schedule to complete the ongoing activities, along with the conclusions of the RECAP evaluation, a budget amendment may be submitted to begin preparing the CAP, including design of the final remedy. Note that while combined reports will be prepared, the costs associated with the Non Owned Other Site - Calhoun Facility are not billed to the Calhoun Remediation Site's ECA and instead are billed to the Non Owned Other Site's cost account.
XIII.D	Technical Team/Project Management	\$123,000	\$28,764	\$126,000	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 preparing the Multistate Trust 2023 Annual Progress Report.
XIII.E	Project Fees & Expenses	\$7,000	\$158	\$7,000	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 preparing the Multistate Trust 2023 Annual Progress Report.
XIII.F	Regulator Oversight Costs	\$10,000	\$0	\$0	Placeholder for reimbursement of LDEQ oversight costs.
XIII.G	Legal Fees and Accounting Fees	\$41,000	\$9,610	\$41,000	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 support in preparing the Multistate Trust 2023 Annual Progress Report.
XIII.I	Lease & Property Use (Income & Costs)	\$0	\$0	\$0	Budget assumes no lease revenues in 2024.
XIII	<b>Total Site 2024 Budget</b>	<b>\$1,205,500</b>	<b>\$468,869</b>	<b>\$1,133,200</b>	
<b>Total Calhoun Remediation Site Estimated Funding at Beginning of 2024 Budget Year*</b>				<b>\$8,289,000</b>	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.
<b>Estimated Remaining Funds (Post-2024)</b>				<b>\$7,155,800</b>	<b>Initial Funding (2/14/11): \$2,720,947</b> <b>Anadarko Settlement Funds (2015 and 2016): \$11,328,575</b> <b>Waterfall Distribution from Sale of Property: \$61,335</b>

\*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.