

**2024 Other Sites Segregated Account (OSSA) Budget Forecast for the Calhoun Facility Non Owned Other Site**

**Date Submitted: 12/20/2023**

Greenfield Environmental Multistate Trust LLC,

[Exhibit I](#)

**Date Approved: 03/28/2024**

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

Submittal 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:** Finalized and submitted to LDEQ the source area Site Investigation Report. 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. Updated the conceptual Site model (CSM) initially prepared in 2022, integrating into the overall CSM for both the Site and the Calhoun Remediation Site. Note that costs associated with the Calhoun Remediation Site (i.e., 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 Calhoun Remediation Site's Environmental Cost Account (ECA). Prepared Multistate Trust 2022 Annual Progress Report.

**Work Planned for 2024:** Complete one Site-wide groundwater sampling event to inform the Non Owned Other Site - Calhoun Facility's 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 Non Owned Other Site - Calhoun Facility and Calhoun Remediation Site. This sampling event is anticipated to close out remaining data gaps for the Non Owned Other Site - Calhoun Facility and 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 Calhoun Remediation Site are not billed to the Non Owned Other Site - Calhoun Facility's cost account. Prepare the Multistate Trust 2023 Annual Progress Report (portion specific to the Site).

Site Name: Non-Owned Other Sites (Tronox Settlement Agreement Attachment B #2), Calhoun Facility

Site Location: Calhoun, LA

Multistate Trust Site Code: 50.i

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
50.i.A	Regulatory Compliance and Site Operations/Maintenance	\$0	\$0	\$0	Not Applicable. The 2024 OSSA Budget assumes no regulatory compliance or O&M.
50.i.C	New Environmental Actions	\$150,600	\$7,848	\$170,000	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 Calhoun Remediation Site are not billed to the Non-Owned Other Site - Calhoun Gas Facility's cost account and instead are billed to the Calhoun Remediation Site's ECA. Budget increase in 2024 is due to receipt of contractor estimates to implement the ASI work plan.
50.i.D	Technical Team/Project Management	\$39,000	\$ ,459	\$39,000	Budget includes fees and expenses for providing project direction and oversight of technical elements of new Environmental Actions including Site strategy, technical oversight of environmental contractors, project controls, project communications, financial management, beneficiary communications, quality assurance/quality control, technical reviews and contract management. The budget also includes fees and expenses to develop the Site strategy and CSM, including incorporation into the overall remedial cleanup strategy and CSM for the Multistate Trust-owned Calhoun Remediation Site, and participate in meetings with LDEQ. Budget also includes fees for preparing the Multistate Trust 2023 Annual Progress Report.
50.i.E	Project Fees & Expenses	\$4,000	\$0	\$4,000	Budget includes Managing Principal time and expenses for: (i) oversight and approval of technical strategy and Environmental Actions; (ii) beneficiary communications; (iii) support for beneficiary community involvement; (iv) key stakeholder communications; (v) Settlement Agreement matters; (vi) budget submittals. Budget also includes fees for preparing the Multistate Trust 2023 Annual Progress Report.
50.i.F	Regulator Oversight Costs	\$10,000	\$0	\$10,000	Placeholder estimate regulatory oversight costs for Lead Agency.
50.i.G	Legal Fees and Accounting Fees	\$15,000	\$282	\$15,000	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. Budget also includes fees for preparing the Multistate Trust 2023 Annual Progress Report.
50.i.I	Lease & Property Use (Income & Costs)	\$0	\$0	\$0	No lease income anticipated
50.i	Total 2021 Site Budget	\$218,600	\$12,589	\$238,000	
<b>Total Site Estimated Funding at Beginning of 2024 Budget Year*</b>				<b>\$1,960,482</b>	Total funds awarded to the Site in connection with the Other Sites Program: \$2,031,216.99  *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.
<b>Estimated Remaining Funds (Post-2024)</b>				<b>\$1,722,482</b>	

This single page document constitutes the annual budget submitted to the Lead Agency in accordance with the Multistate Trust's Application dated June 18, 2018 for Other Sites Funding and/or Reimbursement regarding the Site and consistent with Section 3.2.4 of the Multistate Environmental Response Trust Agreement (Trust Agreement) entered into pursuant to the Tronox Consent Decree and Environmental Settlement Agreement on February 14, 2011. Pursuant to Section 3.2.4 of the Trust Agreement, no expenses may be incurred or paid by the Multistate Trust that are "inconsistent with an approved budget or an approved revised line item for an approved budget."