

Date Submitted: 03/11/2024

Date Approved: 03/27/2024

2024 Other Owned Sites Segregated Account (OOSA) Budget Forecast for the Moss American NPL Site (Owned Portion)

Greenfield Environmental Multistate Trust LLC,
Trustee of Multistate Environmental Response Trust (Multistate Trust)
Submittal to: US Environmental Protection Agency on March 11, 2024

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

Work Completed in 2023: Met with EPA and WDNR to discuss findings of the Phase 2 Environmental Site Assessment Report (submitted in December 2022). Developed anticipated plan to achieve No Further Action determination for site through potential management of site under WDNR NR700 program. Followed up with EPA and WDNR regarding the site's inclusion within the nearby Moss America NPL site; coordinated with EPA and WDNR to evaluate partial site deletion / removal from NPL site based on Phase 2 ESA findings to facilitate transfer into WDNR NR700 program.

Work Planned for 2024: Continue coordination with EPA and WDNR to pursue partial site deletion to remove site from the Moss American NPL site. Pending WDNR request and EPA approval, transfer lead oversight to WDNR to allow use of NR700 program to complete risk evaluation of 2022 Phase 2 ESA soil and groundwater data to demonstrate the site is eligible for NFA determination. No sampling, site investigation, or remediation is planned in 2024; if desired, a budget amendment will be requested.

Site Name: Owned Other Sites (Tronox Settlement Agreement Attachment A-3, #26), Moss American NPL Site (Owned Portion)

Site Location: Milwaukee, WI

Multistate Trust Site Code: 50.g

Cost Center	Cost Center Description	Total 2023 Approved Budget	2023 Project Costs	2024 Budget	2024 Scope of Work
50.g.A	Regulatory Compliance and Site Operations/Maintenance	\$0	\$0	\$0	Budget assumes no regulatory compliance or O&M.
50.g.C	New Environmental Actions	\$40,000	\$918	\$20,000	Complete NR700 risk assessment analysis and report of existing soil and groundwater data to demonstrate site is eligible for NFA.
50.g.D	Technical Team/Project Management	\$15,000	\$5,644	\$10,000	Budget includes fee 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, and contract management.
50.g.E	Project Fees & Expenses	\$1,000	\$0	\$1,000	Budget includes Managing Principal time and expenses for: oversight and approval of technical strategy and Environmental Actions; beneficiary communications; key stakeholder communications; Settlement Agreement matters; and budget submittals.
50.g.F	Regulator Oversight Costs	\$3,000	\$0	\$3,000	Regulatory oversight costs for lead agency.
50.g.G	Legal Fees and Accounting Fees	\$2,500	\$581	\$2,500	Budget includes fees and expenses for in-house legal services required to support Environmental Actions, and costs for financial services, including accounting, bookkeeping, financial reporting, invoice processing, budget preparation, and budget tracking
50.g	Total 2024 Site Budget	\$61,500	\$7,143	\$36,500	
Total Site Estimated Funding at Beginning of 2024 Budget Year*				\$147,000	Total funds awarded to the Site in connection with the Owned Other Sites Program: \$201,908 *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.
Estimated Remaining Funds (Post-2024)				\$110,500	

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. In accordance with 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." Supplemental worksheets, if any, do not comprise a portion of the annual budget.