

2023 Environmental Cost Account (ECA) Budget Forecast for the Calhoun Remediation Site

Date Submitted: 11/23/22

**Greenfield Environmental Multistate Trust LLC,
Trustee of Multistate Environmental Response Trust (Multistate Trust)**

Date Approved: 12/15/22

Submission to: Louisiana Department of Environmental Quality on November 23, 2022

Summary of Site Work Completed in 2022 and Planned for 2023:

Work Completed in 2022: Performed routine operations and maintenance (O&M) of the groundwater treatment system (GWTS), mowing, Site security inspections, and emergency Site visits/inspections, as necessary. Performed semiannual surface water and groundwater quality monitoring, depth to water gaging, and light nonaqueous phase liquid (LNAPL) monitoring. Prepared Second Half 2021 and the First Half 2022 Biannual Corrective Action Reports (CARs) and submitted to the Louisiana Department of Environmental Quality (LDEQ). Pursuant to the requirements of the Louisiana Pollutant Discharge Elimination System (LPDES) Permit, collected quarterly effluent samples at Outfall 001 and submitted quarterly DMRs. Prepared and submitted the Industrial Solid Waste Generator Annual Report (Industrial SWGAR) to LDEQ. Update the overall conceptual Site model (CSM), to include data from the Calhoun Gas Plant Site Source Area Evaluation and Data Gaps Identification—Site Investigation Work Plan (i.e., investigate the upgradient source area) on the Regency Gas property (i.e., Non Owned Other Site - Calhoun Facility). Note that costs associated with the Non Owned Other Site - Calhoun Facility are not billed to the Calhoun Remediation Site's Environmental Cost Account (ECA) and instead are billed to the Non Owned Other Site's cost account. Supported preparation of Chapter 3.L (specific to the Site) of the Multistate Trust 2021 Annual Progress Report.

Work Planned for 2023: Perform routine O&M of the GWTS, mowing, Site security inspections, and emergency Site visits/inspections, as necessary. Perform semiannual surface water and groundwater quality monitoring, depth to water gaging, and LNAPL monitoring. Prepare Second Half 2022 and First Half 2023 Biannual CARs and submit to LDEQ. Pursuant to the requirements of the LPDES Permit, collect quarterly effluent samples at Outfall 001 and submit quarterly DMRs. Prepare and submit the Industrial SWGAR to LDEQ. Perform Additional Site Investigation (ASI) to update the 2016 ASI (i.e., sample 59 groundwater monitoring wells) and close out remaining data gaps for the Calhoun Remediation Site, and 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). Update overall CSM based on the ASI and data collected from the implementation of Calhoun Gas Plant Site Source Area Evaluation and Data Gaps Identification—Site Investigation Work Plan (i.e., investigate the upgradient source area) on the Regency Gas property (i.e., Non Owned Other Site - Calhoun Facility) and complete the RECAP evaluation. Based on the overall schedule to complete the 2023 proposed activities, along with the conclusions of the RECAP evaluation, a budget amendment may be submitted to complete the and Air Sparge Pilot Report and begin preparation of the CAP, including design the final remedy. Support preparation of the Multistate Trust's 2022 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 2022 Approved Budget	Project Costs incurred in 2022 (as of 9/30/2022)	2023 Budget	2023 Scope of Work
XIII.A	Regulatory Compliance and Site Operations/Maintenance	\$687,500	\$427,994	\$753,500	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 2022 and First Half 2023 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 \$75,000 for unplanned events or emergency response; and (viii) a placeholder allowance of \$17,000 for the LDEQ Groundwater Protection Fee.
XIII.C	New Environmental Actions	\$286,500	\$0	\$304,000	Budget includes costs to (i) perform ASI to update the 2016 ASI (i.e., sample 59 groundwater monitoring wells) and close out remaining data gaps for the Calhoun Remediation Site, and 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); (ii) update overall CSM based on the ASI and data collected from the implementation of Calhoun Gas Plant Site Source Area Evaluation and Data Gaps Identification—Site Investigation Work Plan (i.e., investigate the upgradient source area) on the Regency Gas property (i.e., Non Owned Other Site - Calhoun Facility); and (iii) complete the RECAP evaluation. Budget includes a placeholder allowance of \$30,000 for Dr. Hinchee to provide subject matter expertise. Based on the overall schedule to complete the 2023 proposed activities, along with the conclusions of the RECAP evaluation, a budget amendment may be submitted to complete the Air Sparge Pilot Report and begin preparation of the CAP, including design the final remedy.
XIII.D	Technical Team/Project Management	\$128,000	\$23,001	\$124,000	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 2022 Annual Progress Report.
XIII.E	Project Fees & Expenses	\$8,000	\$473	\$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 preparation of Multistate Trust 2022 Annual Progress Report.
XIII.F	Regulator Oversight Costs	\$10,000	\$0	\$10,000	Placeholder for reimbursement of LDEQ oversight costs.
XIII.G	Legal Fees and Accounting Fees	\$41,000	\$8,364	\$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 preparation of Multistate Trust 2022 Annual Progress Report.
XIII.I	Lease & Property Use (Income & Costs)	\$0	\$0	\$0	Budget assumes no lease revenues in 2023.
XIII	Total Site 2023 Budget	\$1,161,000	\$459,833	\$1,239,500	
Total Calhoun Remediation Site Estimated Funding at Beginning of 2023 Budget Year*				\$8,632,000	Total funds allocated to the Site per Consent Decree and Environmental Settlement Agreement; less 2011 - 2021 actual and 2022 estimated costs; plus 2011 - 2021 actual and 2022 estimated investment activity and other receipts.
Estimated Remaining Funds (Post-2023)				\$7,392,500	Initial Funding (2/14/11): \$2,720,947 Anadarko Settlement Funds (2015 and 2016): \$11,328,575 Waterfall Distribution from Sale of Property: \$61,335

*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.