

2023 Environmental Cost Account (ECA) Budget Forecast for the Former Tronox Mining Site in Caselton, Nevada

Greenfield Environmental Multistate Trust LLC,

Trustee of Multistate Environmental Response Trust (Multistate Trust)

Exhibit I

Date Submitted: 12/21/22

Date Approved: 01/23/23 Submittal to: Nevada Division of Environmental Protection on December 21, 2022; Revised on January 23, 2023

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

Work Completed in 2022: OU1: Completed the construction activities for the OU1 Yard Soil Removal (YSR) Action in July 2022 and OU1 YSR Action Construction Completion Report to the Nevada Division of Environmental Protection (NDEP) in September 2022. The Multistate Trust supported Lincoln County's acquisition of APN 001-111-21 for purposes of integration into the overall cleanup plan. Upon Lincoln County's acquisition of the property and based on discussions with NDEP, Bureau of Land Management (BLM), and Lincoln County, the Multistate Trust began implementation of time critical removal action (TCRA) pre-design investigation activities to support evaluation of potential remedial alternatives to stop the immediate migration of tailings from APN 001-111-21 (located in OU-1) onto adjacent residential parcels and streets during storm events. **OU2:** No further action is necessary for OU2; thus, no Environmental Actions were conducted in 2022. **OU4 (OU4A/OU4B):** Procured a Class 5 cost estimate to implement stormwater BMPs to limit tailings migration from the Caselton Mill Site into off-site drainages that flow to OU5 and to facilitate future beneficial reuse of the Caselton Mill Site. In support of the overall cleanup strategy for OU4, supported NDEP with preparation of an application (submitted to the Nevada Delegation on April 15, 2022) for FY23 Community Project Funding Request (Funding Request) in support of remedial investigations and engineering design (including preparing cost estimates) to advance cleanup of the Caselton Mill Site and to facilitate potential future reuse of the Site as a renewable energy (solar) generating facility. Prepared a letter in support of NDEP's Funding Request and submitted to the Nevada Delegation on May 2, 2022. Worked with a local contractor to obtain cost estimates to (i) clear and grub along the Caselton Mill Site perimeter (along Lime Road and the Lincoln County Power District [LCPD]) and associated tailings ponds and (ii) to install security fencing to prevent trespasser access and the potential exposure to elevated lead/arsenic concentrations in this area. Postponed the completion of the OU4 Feasibility Study and instead supported Lincoln County with preparation of EPA Region IX Targeted Brownfields Assessment Program application to request funding in support of Phase I and Phase II Environmental Sites Assessments for OU4 (OUA and OU4B). **OU5:** The University of Nevada Reno (UNR) completed its research of the Caselton Wash Tailings and vadose zone and plans to present its findings in early January 2023. Performed overall project management and coordination of activities. Utilized local on-call support to assist with meeting preparation, community coordination and other requested tasks. Participated in Site visits and other meetings with Lincoln County, Town of Pioche, Lincoln County Commissioners, LCPD, The Nature Conservancy (TNC), U.S. Environmental Protection Agency (EPA), BLM and the NDEP. In coordination with the NDEP, prepared for and hosted two community meetings in August 2022 to provide status updates for Environmental Actions completed to date and to seek community input regarding future reuses of the Site. Supported preparation of Chapter 3.5 (specific to the Site) of the Multistate Trust 2021 Annual Progress Report. Participated in discussions with the NDEP and United States regarding (i) the current Site funding shortfall limiting the Multistate Trust's ability to control/mitigate ongoing, or the imminent threat of, human exposures to Site-related contamination, at concentrations that exceed levels protective of human health (i.e., unfunded critical needs) and (ii) strategies and options to address such unfunded critical needs for this "Critical Site".¹

Work Planned for 2023: OU1: Complete the TCRA pre-design investigation activities and reporting to evaluate potential remedial alternatives to stop the immediate migration of tailings from APN 001-111-21 onto adjacent residential parcels and streets during storm events. Potential remedial alternatives, including conceptual designs and corresponding cost estimates, will be summarized in a feasibility study design memorandum. Participate in meetings with Lincoln County, BLM, NDEP, and the Town of Pioche to both brief on the findings and obtain endorsement of the proposed path forward. Provide meeting support, as needed, to prepare fact sheets and presentation materials for up to two community meetings. Provide on-call subject matter expertise (SME) technical services, as needed, to support the overall implementation of Environmental Actions in OU1. A placeholder allowance of \$50,000 is included for unplanned/emergency response associated with transport of tailings from APN 001-111-21 during storm events. Prepare institutional control plan and support Lincoln County with implementation of signage. **OU2:** No further action is necessary for OU2; thus, no Environmental Actions are planned in 2023. **OU4 (OU4A/OU4B):** Clear vegetation along the perimeter of the Caselton Mill Site and associated tailings ponds and install fencing to prevent trespasser access and potential exposure to elevated lead/arsenic concentrations in this area (costs are split 50/50 with the Administrative Account). Provide on-call SME technical services, as needed, to (i) support Lincoln County's application for EPA Targeted Brownfields Assessment funding in OU4A/OU4B, including access, review of the EPA contractor's health and safety plan, on-site representation on behalf of the Multistate Trust, and review of summary reports issued by EPA, (ii) support up to two community meetings with the Caselton Heights residents, and (iii) support the overall implementation of Environmental Actions at OU4A and OU4B. Participate in ongoing calls with Lincoln County, Town of Pioche, Lincoln County Commissioners, LCPD, TNC, EPA, BLM and NDEP. **OU5:** Prepare for and participate in a meeting with UNR, NDEP, and BLM to review UNR's research findings associated with the tailings and vadose zone. Prepare the draft and final OU5 RI Report that will include (i) results from the Caselton Wash sampling results, (ii) a summary of UNR's analysis, (iii) results from semi-annual groundwater monitoring events (CW-MW-2), and (iv) the screening level HHRA and SLERA. (Note that the OU5 RI Report may not be completed by the Multistate Trust because BLM's scope for the "Caselton Mine & Mill and Impacted Watershed Restoration Update" may include a comprehensive RI.) Provide on-call SME technical services, as needed, to (i) support BLM's "Caselton Mine & Mill and Impacted Watershed Restoration Update" and (ii) support the overall implementation of Environmental Actions at OU5. A placeholder allowance of \$5,000 has been included for a local contractor to provide support for unplanned Site visits by various interested parties, meetings, or other miscellaneous requests. Develop site-specific website. Costs for the website include web design, meetings and revisions, website hosting, and URL purchases. Support preparation of the Multistate Trust's 2022 Annual Progress Report (portion specific to the Site). Budget includes costs to continue discussions with the NDEP and United States regarding (i) unfunded critical needs and (ii) strategies and options to address such unfunded critical needs for this "Critical Site".¹

Former Tronox Mining Site in Caselton, Nevada

Site Location: Caselton, Nevada

Multistate Trust Site Code: XXIII

Cost Center	Cost Center Description	Total 2022 Approved Budget	Project Costs incurred in 2022 (as of 10/31/2022)	2023 Budget ¹	2023 Scope of Work
XXIII.A	Regulatory Compliance and Site Operations/Maintenance	\$0	\$0	\$0	Not applicable at this time.
XXIII.C	New Environmental Actions	\$1,065,000	\$463,387	\$540,000	OU1: Complete the time-critical removal action (TCRA) pre-design investigation activities and reporting to evaluate potential remedial alternatives to stop the immediate migration of tailings from APN 001-111-21 onto adjacent residential parcels and streets during storm events. Potential remedial alternatives, including conceptual designs and corresponding cost estimates, will be summarized in a feasibility study design memo. Participate in meetings with Lincoln County, BLM, the NDEP, and the Town of Pioche to both brief on the findings and obtain endorsement of the proposed path forward. Provide meeting support, as needed, to prepare fact sheets and presentation materials for up to two meetings with community members of the greater Pioche area. Provide on-call subject matter expertise (SME) technical services, as needed, to support the overall implementation of Environmental Actions in OU1. A placeholder allowance of \$50,000 is included for unplanned/emergency response associated with transport of tailings from APN 001-111-21 during storm events. Prepare institutional control plan and support Lincoln County with implementation of signage. OU2: No further action is necessary for OU2; thus, no Environmental Actions are planned in 2023. OU4 (OU4A/OU4B): Clear vegetation along the perimeter of the Caselton Mill Site and associated tailings ponds and install fencing to prevent trespasser access and potential exposure to elevated lead/arsenic concentrations in this area (costs are split 50/50 with the Administrative Account). Provide on-call SME technical services, as needed, to (i) support the Lincoln County's application for EPA Region IX Targeted Brownfields Assessment Program funding, including access, review of the EPA contractor's health and safety plan, on-site representation on behalf of the Multistate Trust, and review of summary reports issued by EPA; (ii) support up to two community meetings with the Caselton Heights residents; and (iii) support the overall implementation of Environmental Actions at OU4A and OU4B. OU5: Prepare for and participate in a meeting with the UNR, the NDEP, and BLM to review the UNR's research findings associated with the tailings and vadose zone. Prepare the draft and final OU5 RI Report that will include (i) results from the Caselton Wash sampling results; (ii) a summary of UNR's analysis; (iii) results from semi-annual groundwater monitoring events (CW-MW-2); and (iv) the screening level HHRA and SLERA. Provide on-call SME technical services, as needed, to support BLM's "Caselton Mine & Mill and Impacted Watershed Restoration Update" and the overall implementation of Environmental Actions at OU5. (Note that the OU5 RI Report may not be completed by the Multistate Trust because BLM's scope for the "Caselton Mine & Mill and Impacted Watershed Restoration Update" may include a comprehensive RI.) A placeholder allowance of \$5,000 has been included for a local contractor to provide support for unplanned Site visits by various interested parties, meetings, or other miscellaneous requests. The budget also includes costs to create a Site-specific website. These costs include web design, meetings and revisions, website hosting, and URL purchases.
XXIII.D	Technical Team/Project Management	\$109,000	\$70,388	\$132,000	Budget includes fees and expenses for (i) the Site Project Manager to oversee, manage, and coordinate all contractor and subcontractor procurement activities and contractor/subcontractor performance of all Environmental Actions (including preparation of all work plans, technical studies, and other deliverables, implementation of fieldwork, participation in beneficiary and stakeholder meetings (e.g., Lincoln County, TNC, Lincoln County Power District [LCPD], EPA, and Town of Pioche); (ii) the Director of Communications to support public meetings, communication deliverables (e.g., fact sheets, public notices, and press releases), development of a site-specific website, and news media relations; (iii) the Director of Construction Services to support the TCRA for tailings located on APN 001-111-21; and (iv) the Program Director to develop and oversee the Site technical strategy, authorize statements of work, manage financial affairs in consultation with the Director of Financial Affairs and Site Project Manager, implement project controls, including schedules, review technical deliverables, and maintain critical and key communications with the beneficiaries and other stakeholders (e.g., Lincoln County, TNC, LCPD, EPA, and Town of Pioche). Budget includes travel and other expenses for the Multistate Trust team to participate in Site visits and meetings with the beneficiaries and other stakeholders. Budget also includes fees for preparation of Multistate Trust 2022 Annual Progress Report. Budget includes costs to support communications with (i) Lincoln County, TNC, LCPD, EPA, NDEP, and BLM regarding the potential future uses of the OU4A (Caselton Mill Site) and OU4B and (ii) with BLM and NDEP regarding BLM's "Caselton Mine & Mill and Impacted Watershed Restoration Update". Budget includes costs to continue discussions with the NDEP and United States regarding (i) unfunded critical needs and (ii) strategies and options to address such unfunded critical needs for this "Critical Site". ¹
XXIII.E	Project Fees & Expenses	\$16,000	\$7,954	\$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 involvement; key stakeholder communications; policy matters; Settlement and Trust Agreement matters; redevelopment planning activities; and preparation of Multistate Trust 2022 Annual Progress Report. Budget includes costs to continue discussions with the NDEP and United States regarding (i) unfunded critical needs and (ii) strategies and options to address such unfunded critical needs for this "Critical Site". ¹
XXIII.F	Regulator Oversight Costs	\$35,000	\$29,997	\$45,000	Oversight costs for lead regulatory agency, including participation in monthly conference calls, public meetings, review of work plans, review of reports/design plans, and other documentation submitted by Multistate Trust.
XXIII.G	Legal Fees and Accounting Fees	\$51,000	\$19,122	\$56,000	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. Budget includes costs to continue discussions with the NDEP and United States regarding (i) unfunded critical needs and (ii) strategies and options to address such unfunded critical needs for this "Critical Site". ¹
XXIII.I	Lease & Property Use	\$0	\$0	\$0	Budget assumes no lease revenues in 2023.
XXIII	Total Site 2023 Budget	\$1,276,000	\$590,848	\$790,000	
Total Former Tronox Mining Site in Caselton, Nevada Estimated Funding at Beginning of 2023 Budget Year*				\$2,202,000	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)				\$1,412,000	Initial Funding (2/14/11): \$269,287 Anadarko Settlement Funds (2015 and 2016): \$6,797,145 Waterfall Distribution from Sale of Property: \$36,801

¹This 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:

²Subject to further consultation with its Lead Agencies and the United States, the Multistate Trust currently defines an Owned Funded Site (OFS) as a "Critical Site" if the OFS lacks sufficient Environmental Cost Account (ECA) Funds to address one or more of the following criteria or conditions: (1) unacceptable and uncontrolled or potentially uncontrolled risk of human exposure to site contaminants; (2) mitigate uncontrolled migration of contaminants off-site at concentrations that exceed applicable human health risk-based criteria; (3) characterize the nature and extent of contamination to determine if site contaminants pose an unacceptable risk to human health; and/or (4) take reasonable steps to protect drinking water supplies and communities with environmental justice concerns.

Critical Sites need an infusion of funds sufficient to address the above criteria so that an OFS is no longer classified as a Critical Site. Additional funds will likely be necessary to achieve regulatory closure. While many OFSs may lack sufficient funds to achieve final regulatory closure (including long-term stewardship), funding shortfalls in those cases can potentially be addressed by funding receipts from waterfalling funds under the Settlement Agreement and Multistate Trust Agreement, interest income, the sale of property and/or the transfer of such responsibility to a successor to the Multistate Trust.