

2024 Environmental Cost Account (ECA) Budget Forecast for the Former Tronox/Kerr-McGee Federal Creosote Site in Rome, New York

Date Submitted: 11/29/2023

Greenfield Environmental Multistate Trust LLC,

Date Approved: 12/19/2023 Trustee of Multistate Environmental Response Trust (collectively the Multistate Trust)

Exhibit I

Submittal to: NY State Department of Environmental Conservation on November 29, 2023

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

Work Completed in 2023: The Multistate Trust worked with NYSDEC to collectively identify and prioritize Environmental Actions that can be implemented with the remaining ECA funding for the Site. As documented through communications with NYSDEC, including the Multistate Trust's proposed remedial investigation (RI) approach attached to its "Response to Lot 4 and Lot 6 Strategies" letter dated July 27, 2023, the Multistate Trust's third-party contractor prepared the Draft Lot 4, 5D and 6 RI Work Plan (RI Work Plan) for Multistate Trust review. It is anticipated that this RI Work Plan will be submitted to NYSDEC for review and approval in December 2023. Prepared Chapter 3.T (specific to the Site) of the Multistate Trust 2022 Annual Progress Report.

Work Planned for 2024: The Multistate Trust will respond to NYSDEC's comments on the Lot 4, 5D and 6 RI Work Plan. Upon NYSDEC-approval of the RI Work Plan, a final schedule for field implementation (including procurement, health and safety planning, and field work) will be submitted to NYSDEC. The Multistate Trust's third-party contractor anticipates that the RI field work will commence in 2024, approximately three to four weeks after receipt of NYSDEC approval of the RI Work Plan. Upon completion of the field work, the Lot 4, 5D and 6 RI Report will be prepared in accordance with the requirements of NYCRR Part 375 and the guidance in NYSDEC DER-10. The RI Report will also include a Qualitative Human Health Exposure Assessment and Fish and Wildlife Resource Impact Analysis (Part 1) Resource Characterization. In coordination with NYSDEC, the Multistate Trust will prepare Site closure documentation to include a Site Management Plan (SMP) for Lot 3A and Lot 3B in accordance with the requirements of NYCRR Part 375 and guidance in NYSDEC DER-10. The budget also includes performing a remedial alternatives analysis for Lot 4 to develop a risk-based closure strategy. The budget also includes (i) a \$50,000 placeholder allowance for the Multistate Trust's third-party contractor to provide on-call technical support services in response to non-routine Environmental Actions at the Site and (ii) a \$50,000 placeholder allowance for Site security, including miscellaneous repairs to fencing, gates, signage, and the on-site investigation derived storage unit (i.e., Conex rental storage container) and preparing Monthly Progress Reports (MPRs) during the implementation of the Lot 4, 5D and 6 RI Work Plan. Prepare the Multistate Trust 2023 Annual Progress Report (portion specific to the Site).

Site Name: Former Tronox/Kerr-McGee Federal Creosote Site in Rome, New York (the Site)

Site Location: Rome, New York

Multistate Trust Site Code: XXIV

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
XXIV.A	Regulatory Compliance and Site Operations/Mainte	\$14,000	\$1,346	\$50,000	The budget includes a \$50,000 placeholder allowance for Site security, including miscellaneous repairs to fencing, gates, signage, and the on-site investigation derived storage unit (i.e., Conex rental storage container), site inspections, and preparing MPRs during the implementation of the Lot 4, 5D and 6 RI Work Plan.
XXIV.C	New Environmental Actions	\$618,000	\$37,277	\$745,000	Budget includes Multistate Trust third-party contractor costs for (i) general project management, communications, preparing Site strategy plans, including remedial alternatives for cleanup and risk-based closure, along with revisions to long-term Site cleanup cost projections to support prioritization of the remaining ECA funds; (ii) responding to NYSDEC's comments on the Lot 4, 5D and 6 RI Work Plan and preparing a final schedule for field implementation (including procurement, health and safety planning, and field work) for submittal to NYSDEC; (iii) implementing the RI field work; (iv) preparing the Lot 4, 5D and 6 RI Report in accordance with the requirements of NYCRR Part 375 and the guidance in NYSDEC DER-10; (v) preparing a Qualitative Human Health Exposure Assessment and Fish and Wildlife Resource Impact Analysis (Part 1) Resource Characterization; (vi) preparing a remedial alternatives analysis for Lot 4 to develop a risk-based closure strategy; (vii) preparing site closure documentation, including a Site Management Plan for Lot 3A and Lot 3B; and (viii) a \$50,000 placeholder allowance to provide on-call technical support services in response to non-routine Environmental Actions at the Site.
XXIV.D	Technical Team/Project Management	\$52,000	\$16,259	\$93,000	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.
XXIV.E	Project Fees & Expenses	\$9,000	\$236	\$9,000	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 preparing the Multistate Trust 2023 Annual Progress Report.
XXIV.F	Regulator Oversight Costs	\$0	\$0	\$0	Budget assumes that the NYSDEC will not seek reimbursement for oversight costs incurred. If NYSDEC requests reimbursement of oversight costs, the Multistate Trust will submit a budget amendment for those costs.
XXIV.G	Legal Fees and Accounting Fees	\$21,000	\$6,453	\$21,000	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, work associated with deed restrictions and Site closure 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 to prepare the Multistate Trust 2023 Annual Progress Report.
XXIV.I	Lease & Property Use (Income & Costs)	\$0	\$0	\$0	Budget assumes no lease revenues in 2024.
XXIV	Total Site 2024 Budget	\$714,000	\$61,571	\$918,000	
Total Former Tronox/Kerr-McGee Federal Creosote Site in Rome, New York Estimated Funding at Beginning of 2024 Budget Year*				\$9,417,000	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.
Estimated Remaining Funds (Post-2024)				\$8,499,000	Initial Funding (2/14/11): \$700,000 Anadarko Settlement Funds (2015 and 2016): \$18,125,721 Waterfall Distribution from Sale of Property: \$98,136

*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.