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2 Kelly E. Richardson (SB No. 210511)
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6 Attorneys for Designated Party,
7 National Steel and Shipbuilding Company

8 CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD

9 SAN DIEGO REGION

10

11 IN THE MATTER OF:

12 CLEANUP AND ABATEMENT ORDER
13 NO. R9-2010-0002

**EXPERT AND NON-EXPERT WITNESS
DISCLOSURES FOR NATIONAL STEEL
AND SHIPBUILDING COMPANY**

Before David King, Presiding Officer for
Prehearing Proceedings

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1 Pursuant to the Presiding Officer's February 18, 2010 Final Discovery Plan For
2 Cleanup Levels and Liability Issues, order dated July 16, 2010, and Code of Civil Procedure
3 § 2034.010 *et seq.*, National Steel and Shipbuilding Company hereby proffers the following
4 expert and non-expert witness designations in the matter concerning Tentative Cleanup and
5 Abatement Order No. R9-2010-0002.

6 **EXPERT WITNESS DESIGNATIONS**

- 7 1. Dr. Thomas Ginn, Exponent, Inc., 1040 E. Parkridge Drive, Sedona, AZ
8 86336.
- 9 2. Mr. David Templeton, Anchor QEA, LLC, 1423 Third Avenue, Suite 300,
10 Seattle, WA 98101.
- 11 3. Dr. Brent Finley, ChemRisk, 25 Jessie Street at Ecker Square, Suite 1800,
12 San Francisco, CA 94105.
- 13 4. Dr. Herbert Allen, University of Delaware, Department of Civil and
14 Environmental Engineering, 354 Dupont Hall, Newark, DE 19716.

15 **NON-EXPERT WITNESS DESIGNATIONS**

- 16 5. None to disclose at this time.

17 Dated: July 19, 2010

18 LATHAM & WATKINS LLP

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20 By Kelly E. Richardson
21 Kelly E. Richardson
22 Attorneys for Designated Party
23 National Steel and Shipbuilding Company
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9 SAN DIEGO REGION

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11 IN THE MATTER OF:

12 CLEANUP AND ABATEMENT ORDER
13 NO. R9-2010-0002

**DECLARATION OF RYAN R. WATERMAN
IN SUPPORT OF THE EXPERT AND NON-
EXPERT WITNESS DISCLOSURES FOR
NATIONAL STEEL AND SHIPBUILDING
COMPANY**

Before David King, Presiding Officer for
Prehearing Proceedings

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1 a. Mr. Templeton is a partner at Anchor QEA, LLC. He is an expert
2 in developing cleanup alternative evaluations, cost estimation, contractor selection and
3 construction management, applying federal and state sediment criteria to the characterization and
4 remediation of contaminated sediments, and ecological and human-health risk management.

5 b. Mr. Templeton's testimony will address the restoration at the
6 Shipyard Sediment Site provided in the Tentative CAO, including estimated costs for conducting
7 the remediation, as well as the implementation and monitoring plans for conducting the same.

8 c. Mr. Templeton has agreed to testify at the hearing on the Tentative
9 CAO.

10 d. Mr. Templeton will be sufficiently familiar with the pending
11 Tentative CAO to submit to a meaningful oral deposition concerning the specific testimony,
12 including any opinion and its basis, that he is expected to give at the hearing on the Tentative
13 CAO.

14 e. Mr. Templeton's hourly expert fees for providing deposition
15 testimony is \$295.50, and his hourly expert fee for consulting with Latham & Watkins LLP is
16 \$197.00.

17 4. Dr. Brent Finley is designated as an expert in the aforementioned matter
18 on behalf of NASSCO.

19 a. Dr. Finley is a board-certified toxicologist and Principal Health
20 Scientist and Vice President of ChemRisk. He is an expert in human health risk assessment,
21 with extensive experience conducting and managing studies involving chemical exposures and
22 human health risk assessment.

23 b. Dr. Finley's testimony will address human health risk associated
24 with the Shipyard Sediment Site.

25 c. Dr. Finley has agreed to testify at the hearing on the Tentative
26 CAO.

27 d. Dr. Finley will be sufficiently familiar with the pending Tentative
28 CAO to submit to a meaningful oral deposition concerning the specific testimony, including any

1 opinion and its basis, that he is expected to give at the hearing on the Tentative CAO.

2 e. Dr. Finley's hourly expert fees for providing deposition testimony
3 and for consulting with Latham & Watkins LLP is \$450.00.

4 5. Dr. Herbert Allen is designated as an expert in the aforementioned matter
5 on behalf of NASSCO.

6 a. Dr. Allen is Professor Emeritus at the University of Delaware, with
7 joint appointments in the College of Civil and Environmental Engineering, and College of Earth,
8 Ocean, and Environment, and is the Director of the Center for the Study of Metals in the
9 Environment. He is an expert in environmental chemistry generally, including the fate and
10 effects of pollutants in water, sediment, and soil environments, and bioavailability of trace
11 metals.

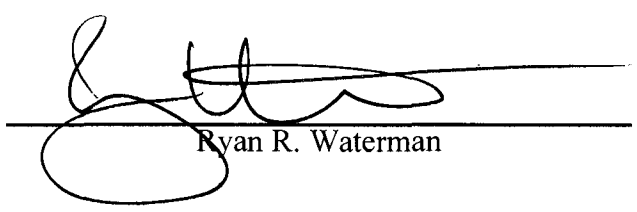
12 b. Dr. Allen's testimony will address environmental chemistry at the
13 Shipyard Sediment Site generally, including fate and effects of pollutants in water, sediment, and
14 soil environments, and bioavailability of trace metals.

15 c. Dr. Allen has agreed to testify at the hearing on the Tentative
16 CAO.

17 d. Dr. Allen will be sufficiently familiar with the pending Tentative
18 CAO to submit to a meaningful oral deposition concerning the specific testimony, including any
19 opinion and its basis, that he is expected to give at the hearing on the Tentative CAO.

20 e. Dr. Allen's hourly expert fees for providing deposition testimony
21 is \$400.00, and his hourly expert fee for consulting with Latham & Watkins LLP is \$200.00.

22 I declare under penalty of perjury under the laws of the State of California that the
23 foregoing is true and correct. Executed on July 19, 2010, at San Diego, California.

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27 Ryan R. Waterman
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9 SAN DIEGO REGION

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11 IN THE MATTER OF:

12 CLEANUP AND ABATEMENT ORDER
13 NO. R9-2010-0002
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PROOF OF SERVICE

Before David King, Presiding Officer for
Prehearing Proceedings

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1 **PROOF OF SERVICE**

2 I am a resident of the State of California, over the age of eighteen years, and not a
3 party to the within action. My business address is Latham & Watkins, 600 West Broadway,
4 Suite 1800, San Diego, California 92101. On July 19, 2010, I served the within document(s):

5 **EXPERT AND NON-EXPERT WITNESS DISCLOSURES FOR NATIONAL
6 STEEL AND SHIPBUILDING COMPANY**

7 **DECLARATION OF RYAN WATERMAN IN SUPPORT OF THE EXPERT AND
8 NON-EXPERT WITNESS DISCLOSURES FOR NATIONAL STEEL AND
9 SHIPBUILDING COMPANY**

10 **BY E-MAIL:** I caused the above-referenced documents to be converted in digital
11 format (.pdf) and served by electronic mail to the addresses listed below.

12 **BY REGULAR MAIL:** I caused the above document(s) to be deposited in the
13 United States mail at San Diego, California, with postage thereon fully prepaid
14 addressed to the party(ies) listed below. I am readily familiar with the firm's
15 practice of collection and processing correspondence for mailing. Such mail is
16 deposited with the United States Postal Service each day and that practice was
17 followed in the ordinary course of business for the service herein attested to.

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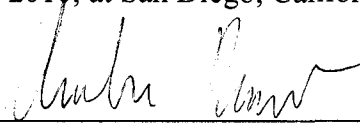
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I declare under penalty of perjury according to the laws of the State of California
that the above is true and correct. Executed on July 19, 2010, at San Diego, California.



Andrea Rasco