



Steven C. Nadeau
Coordinating Director
(313) 465-7978
Fax: (313) 465-8000
snadeau@honigman.com

Via E-Mail

December 14, 2017

Jeanine Townsend
Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814



Re: *Proposed Amendments to the Water Quality Control Plan for Enclosed Bays and Estuaries: Sediment Quality Provisions*

Dear Ms. Townsend:

The Sediment Management Work Group (SMWG) is an ad hoc group of a diverse cross-section of industry (auto, aerospace, chemical, paper, paint, pharmaceutical and utilities, among others), port authorities and government parties actively involved in the evaluation and management of contaminated sediments on a nationwide basis. Founded in 1998, the SMWG has long advocated a national policy addressing contaminated sediment issues that is founded on compliance with the Superfund National Contingency Plan (NCP), particularly its remedy selection criteria and cost-effectiveness proportionality requirements and application of sound science and risk-based evaluation of contaminated sediment management options. See Exhibit A for a list of our members. The following comments are submitted by SMWG and do not necessarily express the opinion or views of any individual SMWG member.

The SMWG appreciates the opportunity to provide comments on the proposed amendments to the Water Quality Control Plan for Enclosed Bays and Estuaries of California to include application and implementation of sediment quality objective (SQO) protecting benthic communities from direct exposure to pollutant in sediments and application and implementation of the SQO protecting human health from exposure through fish consumption. This is a very important, but also highly technically complex topic. We at SMWG recently learned about this proposal at have not had a chance to fully evaluate and respond to the proposal. Therefore, we respectfully request an extension of time to provide comments on this topic of great interest to our members.

In the meantime, we urge the Board to give careful consideration to comments provided by the Western States Petroleum Association and other stakeholders to ensure that the final SQO reflect sound science and the input of all interested stakeholders.

SEDIMENT MANAGEMENT WORK GROUP COMMENTS

June 8, 2017

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The SMWG would be pleased to provide further input to the Board in its deliberations. For further information and to confirm an extension of time to provide comments on the SQO, please contact the SMWG's Coordinating Director, Steven C. Nadeau, c/o Honigman Miller Schwartz and Cohn LLP, 2290 First National Building, 660 Woodward Avenue, Detroit, MI 48226, (313) 465-7492, snadeau@honigman.com.

Sincerely,

Steven C. Nadeau

Steven C. Nadeau, Coordinating Director
Sediment Management Work Group
c/o Honigman Miller Schwartz and Cohn LLP
2290 First National Building, 660 Woodard Ave.
Detroit, MI 48226
(313) 465-7492
snadeau@honigman.com

26251185.1



S. Lee Johnson
Phone: (313) 465-7432
Fax: (313) 465-7433
sljohnson@honigman.com

Steven C. Nadeau
Coordinating Director
Phone: (313) 465-7492
Fax: (313) 465-7493
snadeau@honigman.com

Exhibit A

SMWG Members

Arconic (f/k/a ALCOA)
Ashland
Atlantic Richfield (a BP company)
BASF Corporation
Beazer East, Inc.
Boeing Company, The
CBS Corporation
Chevron Energy Technology Company
Dow Chemical Company, The
DTE Energy
E.I. duPont de Nemours and Company
ExxonMobil
Freeport-McMoRan Copper & Gold, Inc.
General Motors Company
Georgia-Pacific Corporation
Glenn Springs Holdings, Inc.
Gunderson Marine
Honeywell International, Inc.
International Paper
Kinder Morgan
National Grid
NW Natural
Schnitzer Steel
Shell Oil Company
Sherwin-Williams Co.
Waste Management
WEC Energy Group