



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

June 2019

Re: Membership Invitation to the Sediment Management Work Group “SMWG”

Dear Friends and Colleagues:

The Sediment Management Work Group is pleased to invite your consideration of Membership in our organization for the second half of 2019. You are probably keenly aware of the significant technical and financial challenges presented by contaminated sediments. Membership in SMWG can help you address these challenges more effectively by providing opportunities for learning about the latest policy issues and technical developments, networking with other organizations involved with contaminated sediments, including the US Environmental Protection Agency; supporting technical initiatives to improve our understanding of sediment issues and supporting the consistent application of sound decision processes at contaminated sediment sites.

Role of the Sediment Management Work Group (SMWG)

The Sediment Management Work Group (SMWG) was formed in May of 1998 to offer a voice in the emerging evaluation of national policy on contaminated sediment to develop and disseminate technical papers, reports and methods, to encourage remediation strategies based on sound science and risk management principles, and to disseminate information to those engaged in the development of policy, guidance, and actual sediment management strategies.

Establishing Appropriate Background Concentrations at Contaminated Sediment Sites (2016-2018)

We are an action and product focused organization – we get things done! Examples of some recent successful initiatives include:

Principle Threat Waste (PTW) (2018)

We released a White paper on PTW in April 2018 that debunked some of the efforts to misapply the U.S. EPA PTW Technical Bulletin to justify greater dredging at some contaminated sediment sites and setting forth the appropriate application of the PTW concept at sediment sites.

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Fish Exposure Processes Workshop (2018-2019)

The SMWG coordinated, organized and co-chaired (with Todd Bridges, Army Corps ERDC) the widely acclaimed Fish Exposure Processes Workshop at the U.S. Army Corps ERDC facility in Vicksburg, Mississippi (5/30/18). Following the Workshop, the SMWG coordinated follow up on the next steps from the Workshop (setting up work groups on three issues: Exposure and Fish Consumption, Fish Biology and Bioaccumulation and Risk Management and Decision-making) and is in the process of funding and executing research and technical papers on this issue, which is a critical one driving remedy selection at many contaminated sediment sites.

Although the list below of SMWG's accomplishments is extensive, and in 2019, the need for an organization like SMWG in the contaminated sediment arena is greater than ever before. Currently, there is significant concern that the United States Environmental Protection Agency's (U.S. EPA) sediment program is at a critical crossroad. RI/FS costs at some sediment "mega-sites" have exceeded **\$150 million** and the RI/FS Phase has required 15 years or longer to complete. There also is increasing concern that some U. S. EPA Regions are ignoring the Agency's sound national contaminated sediment policy, which is set forth in the National Contaminated Sediment Remediation Guidance (2005) (Sediment Guidance). In fact, in some instances, U.S. EPA Regions have selected or are proposing sediment remedies that are inconsistent with and in disregard of CERCLA's National Contingency Plan and the Sediment Guidance. Unfortunately, this is particularly true at the "mega-sites," where the results of failing to follow the Sediment Guidance have extreme consequences-- remedies that are inappropriately focusing on mass removal rather than risk reduction which typically result in multi-million cubic yard dredging remedies that are projected to cost in the \$1 to 2 billion plus range. To make matters worse, those mega dredging projects are likely to be less protective than risk reduction-focused remedies, because of the likelihood that significant contaminants will be released into the waterbody during the lengthy dredging construction, impacting fish not only for the multiple years of duration of the dredging, but for many years thereafter. The failure to follow the Sediment Guidance can also impact non-mega sediment sites as well.

Below is a brief recap of some of the other recent key accomplishments of the SMWG.

- Successfully organized and moderated four topical Webinar calls with our Sponsors and Members
- Federal Regulation of Venting Groundwater/Direct Hydrologic Connection (Roger Claff of American Petroleum Institute and Mike Erickson of Arcadis) (4/13/18)
- PCB Analytical Methods and Their Relative Advantages and Limitations (David Blye of Environmental Standards and Mary Christie of Pace Analytical) (5/18/18)
- Interplay of TEFs and Total PCBs in Risk Assessment and Remedial Decisions (Denise Kay of O'Brien & Gere) (6/15/18)

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- Introduction and Discussion of Sediment-Related Initiative of the University Consortium for Field-Focused Research (9/10/18)
- Planned and chaired the highly attended and widely acclaimed Spring Sediment Symposium in San Diego, California (4/20/18)
- Served on the 2019 Battelle Sediment Conference's Technical Steering Committee and successfully championed selection of two panels and a Lunch and Learn (Fish Exposure Panel, Sustainability Panel and Background Principles Lunch and Learn); [securing Battelle selection of three important technical topics, thereby providing the opportunity to educate a large cross-section of sediment practitioners, was challenging but will be rewarding when they are presented]
- Cost-Effectiveness Proportionality White Paper (2019) (setting forth a process to actually faithfully apply the proportionality analysis to evaluation of the CERCLA and NCP cost-effectiveness remedy selection proportionality requirement that is frequently ignored.
- Sustainability White Paper (2019)

The Organization

The SMWG consists of a strong and diversified membership including representation from aerospace, manufacturing, metals, oil, chemical, gas and electric - utilities, paper industries, and commercial ports among others. The SMWG also includes Associate Members, consisting of several industry and trade associations and government PRPs, including the U.S. Army Corps of Engineers and certain departments of the U.S. Navy. As interest and concern over sediment issues have increased, our membership ranks have correspondingly grown, and we now have 25 Members and 77 entities overall in 2019. A listing of our current Members, Sponsors and Affiliates is attached as Exhibit "A."

Our robust membership has provided the financial resources to permit the SMWG to effectively address important issues in sediment management and remediation decisions over the years. However, in order to more strenuously address these challenges by pressing EPA HQ to enforce the application of its own Guidance at this critical, crossroads time, while also continuing our vital technical advocacy work, we need to broaden our base with the participation and support of your organization and others. Consequently, in addition to your organization's potential interest in the SMWG, if you are aware of other organizations that also might be interested in the Group, please feel free to share this information with them and/or provide us with a contact for follow-up.

We look forward to welcoming you to SMWG. For more information about SMWG and how you can benefit from joining, please read additional details about our organization below.

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The Mission and Activities of SMWG

The Mission Statement of the SMWG as stated is:

*To advance scientifically sound approaches
to improve sediment risk assessment,
collect and share information to enhance
and evaluate remedial technologies and alternatives,
and promote risk-based and cost-effective
sediment management decisions.*

The SMWG's initiatives have been designed to heighten awareness among Federal and State regulators of the need to incorporate sound science, risk-management decision-making principles and consistency in the development of sediment management strategies. The initiatives of the SMWG and its members have evolved over the years as the sediment issue continues to gain prominence in federal and state regulatory agendas. The SMWG's initiatives/activities are categorized into three main areas: (1) Engagement on National Policy, Guidance and Tools; (2) Education/Outreach; and (3) Member & Other Activities.

With respect to active involvement on National Sediment Policy, Guidance and Tools, the SMWG has engaged in ongoing dialogue with the senior EPA officials in the Office of Land and Emergency Management (OLEM) formerly OSWER and the Office of Superfund Remediation Technology and Innovation (OSRTI) responsible for establishing and implementing the Agency's national sediment policy and programs, and advocating compliance with EPA's sound risk-based sediment policy by all of the Regions. The Group has been invited to comment on and in some cases, to peer review, many critical new policy and technical documents over the years. On the technical side, the Group has worked closely with EPA in spearheading new ideas for technical guidance and methods to supplement the national sediment policy with more detailed recommendations and tools. Many of these guidelines and tools were born out of joint workshops with EPA and the Corps, consistent with our second category of activities, Education and Outreach. The 2016 SMWG organized technical workshop focused on developing a sound technical method to establish background concentrations for use in establishing the remediation goals at contaminated sediment sites discussed above is one such example.

Another example is a recently (2019) initiated PFAS exposure zebra fish research study initiated and funded by some SMWG Members that is being conducted by the U.S. Army Corp Engineering Research and Development Center (ERDC) in collaboration with U.S. EPA three Australian governmental/quasi-governmental agencies. In addition, the SMWG has sponsored numerous joint conferences and symposia with EPA and the Army Corps intended to educate EPA and State project managers and private practitioners on key sediment issues and trends. Finally, we conduct semi-annual meetings and regular outreach with our Members, Sponsors and Affiliates, including publication of Sediment Alerts to keep everyone posted of new developments. (See Appendix A for greater detail)

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Benefits of Membership

In addition to our important efforts to influence national sediment management strategy and adherence to the detailed sediment policies set forth in the National Sediment Guidance, we expect that continued exchange of information among our members will lead to efficiencies and successes by our members as they address the difficult and complex issues of contaminated sediments around the country. For example, members of the SMWG receive frequent, timely electronic updates on new developments pertaining to virtually all aspects of sediment issues, including: new developments and precedents from current sediment sites, remedy selection decisions, technology transfer and many other related topics. We conduct day and a half Member meetings semi-annually, typically one in the Spring and one in the Fall (our 2018 Meetings included a Members Meeting in April 2018 followed by a Symposium in San Diego, California and a Members Meeting in October 2018 in Nashville, Tennessee followed by a Sponsor Forum. During our annual Sponsor Forum, we enjoy hearing technical presentations and case studies from many of our Sponsors and we sometimes engage in round robin discussions as well. We also include site tours of active sediment remediation projects of interest from time to time. For example, we have toured such notable sites as the Willamette River, Hudson River, the Fox River, the Passaic River, the Grand Calumet River, the Grasse River and Commencement Bay, among many others. In addition to the substantive information covered, our members find that these meetings provide additional valuable opportunities to network and exchange ideas on their respective sediment issues. We also conduct monthly Members conference calls to review our current initiatives, to develop and refine our strategy and to provide updates on subjects of interest. Finally, in 2018 we initiated a Quarterly Webinar program on topics of interest to our Members and Sponsors. The 2018 Webinars presented were:

- Federal Regulation of Venting Groundwater/Direct Hydrologic Connection (Roger Claff of American Petroleum Institute and Mike Erickson of Arcadis) (4/13/18)
- PCB Analytical Methods and Their Relative Advantages and Limitations (David Blye of Environmental Standards and Mary Christie of Pace Analytical) (5/18/18)
- Interplay of TEFs and Total PCBs in Risk Assessment and Remedial Decisions (Denise Kay of O'Brien & Gere) (6/15/18)
- Introduction and Discussion of Sediment-Related Initiative of the University Consortium for Field-Focused Research (9/10/18)

As noted above, the SMWG provides funding and technical resources to develop important technical guidelines and tools, such as a compendium of SQV/TRV values for polyaromatic hydrocarbons that is available to our Members. SMWG also funds important research on issues of concern to our Members, including:

- Critical Review of Mercury Sediment Quality Values (SQV) for Protection of Benthic Invertebrates (ET&C 2015)

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- Toxicity Reference Values for Methylmercury Effects On Avian Reproduction: Critical Review and Analysis (ET&C 2016)
- Critical Perspectives On Mercury Toxicity Reference Values for Protection of Fish (ET&C 2016)
- Recommendations for the Derivation and Use of Biota-Sediment Bioaccumulation Models for Carcinogenic Polycyclic Aromatic Hydrocarbons (IEAM 2017)
- Critical Review of Sediment Benchmarks for PAHs (2019)

Additionally, many of our members have independently undertaken research studies, projects and review of sediment management issues in great detail which are being shared with our membership. These efforts can provide a tremendous efficiency in accelerating the learning curve on sediment management issues, not to mention the potential time and cost savings. We are confident that if your organization faces the prospect of even one potential sediment site, the information, ideas and strategic options available to you from membership in the SMWG will recoup many dividends for your organization.

Broad-based support of the initiatives of the SMWG is important to strengthen the impact of our message. In 2019, we will need your support more than ever as remedial decisions are to be reached at other significant sites and implementation of those decisions recently made will begin. Moreover, with the change in administration, building upon a strong effort in 2019, should provide a unique opportunity to address head-on the significant disregard of NCP and the U.S. EPA Sediment Guidance by some of the EPA Regions, by pushing for a substantial increase in the HQ role in the remedy selection process in order to ensure that all Regions follow the Sediment Guidance.

The extremely expensive cost of addressing contaminated sediments as evidenced by the estimated costs in the Lower Passaic River ROD (estimated by Region 2 to be well over \$1 billion, the Willamette River (Portland Harbor) ROD (estimated by many to cost over \$1 billion), the Gowanus Canal ROD (\$305 million) and the Lower Duwamish ROD (\$342 million), underscore the need for continued coordinated and cooperative action by potentially responsible parties. Your active involvement in the SMWG would be an excellent way to help shape the future of this important issue.

2019 Meetings

In 2019, the SMWG will once again host Member meetings in the Spring and Fall. The 2019 Spring Members Meeting was held on April 24th – 25th in Houston, Texas. The 2019 Fall Meeting is scheduled for October 29th – 30th and will be coupled with a Sponsor Forum October 30th – 31st.

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Invitation

As noted above, significant work will be required in 2019 and thereafter to continue pressing for national implementation of an appropriate risk-management decision-making framework, including strict adherence to U.S. EPA's Sediment Guidance by all EPA Regions, encouragement of training in the application of U.S. EPA's Guidance, continuing discussions with U.S. EPA and other stakeholders, and continuing to serve as a catalyst for new sediment management ideas.

We hope you will consider joining the SMWG this year. Dues for Members are \$15,000.00 per year. Dues for new Members joining in June or thereafter will be one-half of the annual dues (\$7,500.00). Dues for Ports are \$5,000.00 per year, although Ports are also eligible to join as full Members. Dues for Associate Members (trade associations and government PRPs) and Affiliate Members (academia and other research organizations) are "gratis." We have attached a registration form and dues invoice for your convenience, should you decide to join us.

Please forward this invitation to the appropriate individual in your organization responsible for sediment issues if we reached you in error.

Thank you for your interest in our organization. If you have any questions that have not been addressed in this correspondence or on our web page (www.smwg.org), please feel free to contact us by phone or e-mail.

Very truly yours,

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

Attachments

Appendix A

“SMWG Activities”

1. **Policy/Guidance/Tools** covers initiatives that address national sediment policy, guidance related to national sediment policy, and technical tools, guidelines and bulletins needed to implement national sediment policy. Examples of these initiatives include:

Dialogue with U.S. EPA Headquarters

- Engagement in high level discussions with U.S. EPA Headquarters, including meetings with the U.S. EPA Assistant Administrator for the Office of Land and Emergency Management (OLEM) (formerly OSWER), to effectively introduce technical approaches and comment on existing and proposed policy and technical issues
- Engagement in discussions with U.S. EPA’s Office of Superfund Remediation, Technology and Innovation (OSRTI) regarding concerns about Regional disregard of EPA’s National Sediment Guidance and making recommendations on existing and proposed national policy and technical issues
- Engagement in discussions with U.S. EPA’s Office of Water on the important interplay of CWA issues and Superfund (particularly the impact of the lack of source control in the municipal outfall setting)

Workshops & Key Presentations

- Hosted a Contaminated Sediment Symposium in April 2018 in San Diego, CA featuring the U.S. Navy’s sediment work being performed by the U.S. Navy and D.O.D.
- Hosted a Joint Workshop in November, 2016 in Washington, D.C. on establishing the appropriate scientific and technical methods for determining “background” at Contaminated Sediment sites
- Hosted a Contaminated Sediment Symposium in May 2016 in Vicksburg, MS at the U.S. Army Corps Engineering Research and Development Center, featuring the Corps leading scientists and engineers and tours of some of its labs and projects
- Hosted a Contaminated Sediment Symposium in November 2014 which featured speakers presenting on new U.S. EPA directives, guidance documents and technical tools in the contaminated sediment arena from both the industry and regulatory perspective
- Hosted a Contaminated Sediment Symposium in May 2013 focusing on a wide variety of important technical areas, including new developments in use of passive samplers, bioavailability measurements, SWACs, the latest on in-situ sediment remediation as well as updates on the ITRC Guidance and various policy issues and recent developments

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- Collaborated with the U.S. Army Corps of Engineers in May 2011 on a workshop, “Working Toward A New Contaminated Sediment Site Paradigm,” which challenged workshop participants to develop ways within the existing Superfund framework (i.e., CERCLA and the NCP) to achieve better results at contaminated sediment sites in one half the time and at one half the cost
- Participated in a workshop, “Risk Management for Contaminated Sediments: Capturing the Scope of the Problem Through Mental Modeling,” in the Spring of 2009 organized by the U.S. Army Corps of Engineers, which facilitated identification of major obstacles to remediating contaminated sediment sites through dialogues among U.S. Army Corps of Engineers, U.S. EPA, and the SMWG
- Participated in the 4R’s of Environmental Dredging Workshop in the Fall of 2005
- Provided extensive data and presentations to the NAS Committee on “Sediment Dredging at Superfund Megsites: Assessing the Effectiveness” and to the NAS Committee on “A Risk-Management Strategy for PCB-Contaminated Sediments”

Key Publications

- “Important Considerations in the Derivation of Background at Sediment Sites (Geiselbrecht, Nadeau, Blue, Rouhani and Thorbjornsen)
- “Accelerating Progress at Contaminated Sediment Sites: Moving from Guidance to Practice,” published by the Journal of Integrated Environmental Assessment and Management (Nadeau, Bridges and McCullough)
- “The 4Rs of Environmental Dredging: Resuspension, Release, Residual, and Risk,” published by U.S. Army Corps of Engineers – Engineer Research and Development Center – Dredging Operations and Environmental Research Program (Steven C. Nadeau, co-author)

Peer Reviews & Comments

- Submittal of Comments on the Interstate Technology & Regulatory Council (ITRC)
- Acted as a peer reviewer for the NAS Committee’s report “Sediment Dredging At Superfund Megsites: Assessing The Effectiveness”
- Peer reviewed the draft Department of Defense “Monitored Natural Recovery at Contaminated Sediment Sites Guidance”
- Submitted extensive comments on U.S. EPA’s draft “Contaminated Sediment Remediation Guidance for Hazardous Waste Sites”
- Commented on proposed changes to the operating procedures of and coordination between site reviews by the National Remedy Review Board and the Contaminated Sediments Technical Advisory Group

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- Commented on and provided precedent on the appropriate point of waste characterization sampling of PCB-impacted sediments (ex-situ, in staging areas as opposed to historical in-situ sediment samples)
- Commented on PRP eligibility to participate in sediment remediation under the Great Lakes Legacy Act
- Commented on NYSDEC's Draft Assessment and Screening Guidance
- Commented on the State of Washington's proposed Sediment Management Standards amendments
- Commented on the Proposed Plan for the Lower Willamette River (Portland, Oregon)
- Commented on the Proposed Plan for the San Jacinto Site (Houston, Texas)
- Commented on the Proposed Plan for the Lower Passaic River
- Commented on the Proposed Plan for the Gowanus Canal
- Commented on the draft Focused Feasibility Study for the Passaic River
- Commented on the draft Feasibility Study for the Gowanus Canal
- Commented on the Proposed Plan for the Lockheed West Seattle Superfund Site
- Commented on the Proposed Plan for the Sudbury River–Nyanza Chemical Waste Dump
- Commented on the proposed ROD Amendment for the Fox River
- Commented on U.S. EPA's Contaminated Sediment Science Plan and the second generation Contaminated Sediment Inventory
- Provided comments on the U.S. EPA's draft "Sediment Management Principles"
- Commented on California Water Board proposed Sediment Quality Objectives
- Submitted comments in response to EPA request for regulatory reform recommendation
- Submitted comments to EPA Superfund Improvement Task Force

Supporting Important Critical Reviews of Sediment Benchmarks

- Spearheaded a wide-ranging critical review of risk-based mercury sediment benchmarks that are often used by regulators to drive remedy decisions

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- The mercury critical review resulted in a presentation on toxicity reference values for benthic invertebrates at the International Conference of Mercury as a Global Pollutant, Edinburgh, Scotland (2013)
 - A Critical Review of Mercury Toxicity Reference Values for Protection of Fish is scheduled to be published in *Environmental Toxicology and Chemistry* in 2016
 - Toxicity Reference Values for Methylmercury Effects on Birds: Critical Review and Analysis, will be submitted for publication during 2016
 - A critical evaluation of the science underlying polyaromatic hydrocarbon (PAH) toxicity thresholds for benthic invertebrates is currently underway
 - A critical evaluation of empirical fish and shellfish sediment-biota accumulation factors for selected PAHs is also underway
2. **Education/Outreach** includes initiatives that educate other stakeholders, including federal and state RPMs, on national sediment policy, implementation of national sediment policy, and related technical matters. Additionally, the SMWG has undertaken several initiatives focused on state related issues. Examples of the SMWG's Education/Outreach activities include:

Joint Conferences: Co-Sponsored with U.S. EPA and U.S. Army Corps

- “The Alpha and the Omega and Points In Between Conference,” April 13-14, 2010 in Chicago, IL (focusing on Key Sediment Site RI/FS Issues)
- “Optimizing Decision-Making and Remediation at Complex Sediment Sites,” January 8-10, 2008 in New Orleans, LA
- “Addressing Uncertainty and Managing Risk at Contaminated Sediment Sites,” October 26-28, 2004 in St. Louis, MO
- “Symposium on the Stability of Chemical Contaminants in Sediments,” April 2003 in San Diego, CA
- “Sediment Stability,” (physical stability) January 2002, in New Orleans, LA

Training Courses, Steering Committees, and Technical Conferences

- Co-sponsored the well-attended *Sediment Remediation Training Course: How Do You Select And Design Options?*, an intensive three-day training course in September 2007 in Portland, OR and October 2007 in Atlanta, GA
- Participated on the Technical Steering Committee for the 4th, 5th, 6th, 7th, 8th and 10th, and currently, on 12th International Contaminated Sediment Conferences sponsored by Battelle (January 2007, February 2009, February

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2011, February 2013, February 2015 and the next conference in February 2019)

- Participated in various technical conferences including the Battelle International Contaminated Sediment Conferences and the University of Massachusetts Annual International Conferences on Soils, Sediments, Water and Energy
3. **Member & Other Activities** includes Sediment Alerts, providing Members with requested information, twice-yearly Member meetings, monthly Member conference calls, Sponsor Forums, and Contaminated Sediment Management Symposiums.



2019 GENERAL MEMBERS (24)

ASHLAND

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Chevron


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WASTE MANAGEMENT

KINDER MORGAN

 **Dow**

nationalgrid

 **WEC**
Energy Group

2019 ASSOCIATE MEMBERS (15)



2019 AFFILIATE MEMBERS (8)

Roger Santiago, Environment Canada
 John Cargill, ITRC
 Greg Neumann, ITRC
 Phillip Gschwend, MIT Parsons Laboratory

Upal Ghosh, University of Maryland-Baltimore
 G. Allen Burton, University of Michigan
 Daniel Cassidy, Western Michigan University
 Jeff Steevens, USGS Environmental Research Center

2019 PORT MEMBERS (1)



2019 SPONSORS (62)



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Sediment Management Work Group

www.smwg.org

2019 Membership Registration Form

Membership Class: _____ Member
(Please check one)
_____ Port
_____ Associate Member (industry and trade associations
and government PRPs)

Organization Name: _____

Representative name(s) and contact information:

Name: _____	Name: _____
Address: _____	Address: _____
Phone: _____	Phone: _____
Fax: _____	Fax: _____
E-Mail: _____	E-Mail: _____

Name: _____	Name: _____
Address: _____	Address: _____
Phone: _____	Phone: _____
Fax: _____	Fax: _____
E-Mail: _____	E-Mail: _____

Please return this form electronically, together with a digital copy of your organization's logo (for inclusion in the Membership Roster) to:

**Steven C. Nadeau
Sediment Management Work Group
e-mail: snadeau@honigman.com
Telephone: 313.465.7492; Facsimile: 313.465.7493**

Honigman, LLP
For The Benefit Of The Sediment Management Work Group
2290 First National Building, 660 Woodward Avenue, Detroit, MI 48226
Phone (313) 465-7492 – Fax (313) 465-7493
Federal Tax I.D. Number 38-1407377
snadeau@honigman.com - www.smwg.org

INVOICE

2019 Membership Dues

Amount: \$15,000.00

Organization Name: _____

Please make your check payable to:

Honigman, LLP
f/b/o Sediment Management Work Group

Submit your payment to:

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