

Vector Control General Permit

Item #6

A close-up photograph of a mosquito on a person's skin. The mosquito is positioned in the center of the frame, with its legs and wings clearly visible. The skin is a light, warm tone, and the background is a soft, out-of-focus green. The lighting is natural, highlighting the texture of the mosquito's body and the skin.

State Water Resources Control Board
Adoption Meeting, March 1, 2011

Points to Ponder

- Permit regulates **biological pesticide** and **residual chemical pesticide** discharges.
- USEPA has determined biological pesticides to be non-toxic or less toxic.
- Chemical pesticide becomes a **residual** if applied in excess or after pesticide has served its intended purpose.
- Pesticide products in Permit contain **inert ingredients**.
- Cannot disclose **inert ingredient** due to DPR's confidentiality requirements.
- Permit cannot set limits on **inert ingredients**.
- Chemical testing for active ingredient will not account for **inert ingredients**.

Why Do Toxicity Testing?

- Monitor toxic effects of pesticide applications.
- Determine if **combined effects of active ingredients, inerts, and pesticides in receiving water** are causing or contributing to toxicity.
- Implement Basin Plans' objective of no toxics in toxic amounts.
- Determine if application methods/equipment are causing toxicity.

11/2/2010 Comment Letters

Letter Number	Affiliation	Representative
1	California Sportfishing Protection Alliance	Bill Jennings
2	City of Los Angeles Department of Water and Power	Katherine Rubin
3	Friends of Ballona Wetlands	Lisa Fimiani
4	General Public	Cameron Colson
5	General Public	Jonathon Olson
6	Heal the Bay	Kirsten James, Mark Gold
7	Lahontan Regional Water Board	Lauri Kemper
8	Mosquito Vector Control Association of California	Catherine Smith
9	National Marine Fisheries Service	Steven Edmondson
10	Orange County Water District	Michael R. Markus
11	Better Urban Green Strategies (BUGS) Environment California Health and Habit Mothers of Marin Against the Spray Pesticide Free Zone Pesticide Watch Education Fund Safe Alternatives to Pesticides Safety Without Added Toxins Stop the Spray East Bay Stop West Nile Spraying Now	Samantha McCarthy Dan Jacobsen Sandy Ross Debbie Friedman Ginger Sounders-Mason Paul S. Towers Nancy Jamello Karen Laslo Nan Wishner Don Mooney
12	San Francisco Bay Keeper	Naomi Kim Melver

Response to 11/2/10 Comments

- Provided five toxicity testing options for Board consideration.
- Sixth Option: State Water Board conducts toxicity study.
- Changed Receiving Water Monitoring Trigger of 0.1 $\mu\text{g}/\text{L}$ to Receiving Water Limitation for Malathion.
- Revised antidegradation finding.
- Removed post-event monitoring for adulticides.
- Added the following:
 - Five biological larvicide products.
 - 30-day public comment period for Pesticide Application Plan (PAP).
 - Requirement for web posting of pesticide application schedule if discharger maintains a website.

Response to 11/2/10 Comments

- Added the following (continued from Page 6):
 - PAP processing, approval, and modifications information.
 - Minimum BMP requirements to PAP.
 - Prohibition on discharge of a class of pesticides to waterbodies impaired by an active ingredient of same class.
 - Required actions when monitoring results show toxicity or exceedance of triggers or limit.
 - 60-day deadline to complete corrective actions.
 - Clarified in Tables C-1 and C-2 that sample collection coincide with pesticide applications.
 - Justification for six-sample requirement.

2/18/2011 Comment Letters

Letter Number	Affiliation	Representative
1	California Department of Public Health	Vicki Kramer
2	City of Los Angeles Department of Water and Power	Katherine Rubin
3	Mosquito Vector Control Association of California	Catherine Smith
4	<p>Californians for Pesticide Reform Environment California Health and Habitat Mothers of Marin Against the Spray Pesticide Action Network of North America Pesticide Free Zone Pesticide Watch Education Fund Safe Alternatives to Pesticides Safety Without Added Toxins (SWAT) San Francisco Baykeeper Stop the Spray East Bay</p>	<p>David Chatfield Dan Jacobsen Sandy Ross Debbie Freidman Katherine Gilje Ginger Souders-Mason Paul S. Towers Nancy Jamello Karen Laslo Jason Flanders Nan Wishner</p>

Response to 2/18/11 Comments

- Corrected fee amount to be consistent with Fee Schedule for vector control activities.
- Added “if the Discharger has a website” to the requirement for web posting of application schedule.
- Removed the listing of gates and control structures in PAP.
- Revised visual monitoring requirements to six application areas or 10% of all application areas, whichever is greater, during an application event.
- Required dissolved oxygen testing in larvicide applications only when temephos is used.
- Added definition for “biological pesticides.”
- Returned one-week post-event monitoring requirement after project completion.
- Made some minor clarification changes.





Effective Date of Permit

- USEPA and State Water Board Memorandum of Agreement specifies 100 days before a general permit becomes effective.
- USEPA in a 2/17/11 email waived the requirement.
- Staff proposes that the permit become effective immediately after adoption.





Contact Information



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