

From: [Elissa Callman](#)
To: [Laputz, Adam@Waterboards](#)
Cc: [Karkoski, Joe@Waterboards](#); [Fregien, Susan@Waterboards](#); [Dave Brent](#); [Bill Busath](#); [Michael Malone](#); [Sherill Huun](#); [Williamsf@saccounty.net](#); [Gwaltney, Dan](#); [butlervi@saccounty.net](#); [hlai@ebmud.com](#); [Dan Mount](#); [ewhite@ebmud.com](#); [Pravani Vandeyar](#); [Dave Phillips](#); [Bonny Starr \(bstarr@usamedia.tv\)](#)
Subject: Comments from Sacramento River Source Water Protection Program on ILRP Draft Individual WDRs
Date: Thursday, January 10, 2013 3:40:04 PM

Dear Adam:

The Sacramento River Source Water Protection Program appreciates the opportunity to provide comments on the Waste Discharge Requirements General Order for the Irrigated Lands Program for Dischargers not Participating in a Third-Party Group (Individual WDRs). The Sacramento River Source Water Protection Program strives to protect the quality of the Sacramento River water supply of the Cities of Sacramento and West Sacramento, Sacramento County Department of Water Resources, and East Bay Municipal Utility District for the current and future generations. We serve drinking water to more than 600,000 people in Northern California. We have been actively tracking the development of the Long Term Irrigated Lands Regulatory Program (ILRP) orders, because they have the potential to impact our source water quality.

We reviewed this proposed Individual WDRs and associated Monitoring and Reporting Program (MRP) and have three specific comments related to the MRP.

Comment Number 1 – MRP Section III B. Surface Water Monitoring

In Table 1, second paragraph there is a statement that “Irrigation tailwater monitoring is not required for fields with tailwater return systems, pressurized irrigation systems, or other systems that do not result in measurable tailwater discharge.” We were unable to locate a definition of the term “measurable tailwater discharge” and would like to request clarification.

Comment Number 2 – MRP Section III B. Surface Water Monitoring

We appreciate that there will be direct monitoring of storm water and irrigation tailwater under this order which will provide the highest level of information available to assess the impact of the irrigation activities and effectiveness of best management practices. We have noted that the list of constituents required to be monitored in Table 2 is shorter than in the third-party group orders and is missing two key indicators related to the drinking water beneficial use; *Escherichia coli* (*E. coli*) and total organic carbon.

As proposed, fecal coliform is required when manure has been applied within the past year but we feel that this is inadequate to represent other potential sources of coliform bacteria in agricultural fields. The USEPA and California Department of Public Health are preferentially using *E. coli* as the appropriate surrogate for the presence of microbiological contaminants for drinking water. We believe that all irrigated dischargers should be required to sample for *E. coli* with a frequency of D1

and D2.

Agriculture is a known source of TOC to the water supply and is a critical constituent in drinking water treatment. We believe that all irrigated dischargers should be required to sample for TOC and it should be added to Table 2 with a frequency of D1 and D2.

Comment Number 3 – MRP Sections III B Surface Water Monitoring and V Pesticides (Surface Water)

Pesticide monitoring is required under this order if a discharge (whether irrigation or storm water derived) occurs within 60 days of pesticide application. There is a specific list of pesticides to be monitored if this condition occurs.

We do not feel that a fixed list of pesticides is an appropriate means of setting long term orders. Agricultural practices vary over time and new products are introduced periodically.

This list does not include several of the pesticides of interest to drinking water beneficial use such as 2,4-D, 1,3-dichloropropene, methyl bromide, atrazine, and methamidophos. Each of these pesticides has significant agricultural usage in the Sacramento River Valley and has either a relatively low USEPA human health benchmark [1], drinking water Health Advisory level [2], or drinking water standard [3] [4].

We would recommend that the list be expanded to include these pesticides, but also be framed in a manner that would allow future pesticides to be added readily if appropriate.

We also request that the chemical analysis requirements in Appendix MRP-1, Table 1, provide maximum reporting limits that are no greater than 50 percent of the drinking water standard, drinking water Health Advisory level, or USEPA Human Health Benchmark for the pesticide. Where practically achievable, reporting limits should be no greater than 10 percent of the applicable drinking water standard, advisory, or benchmark level. For example, the proposed reporting limit for lambda-cyhalothrin (35 ug/L R.L.) is five times the USEPA human health benchmark of 7 ug/l; reporting limits listed in the State Board's SWAMP database for lambda-cyhalothrin are much lower than 7 ug/L.

The Sacramento River Source Water Protection Program appreciates the efforts of Board staff on the Irrigated Lands Program. Please do not hesitate to contact me if you have any questions on our comments or need additional information.

Sincerely,
Elissa Callman
Senior Engineer

City of Sacramento Dept. of Utilities
916-808-1424
ecallman@cityofsacramento.org

[1] USEPA Human Health Benchmarks for Pesticides; <http://iaspub.epa.gov/apex/pesticides/f?p=HHBP:home:1641119412947801>

[2] USEPA 2012 Edition of the Drinking Water Standards and Health Advisories;
<http://water.epa.gov/action/advisories/drinking/upload/dwstandards2012.pdf>

[3] USEPA National Primary Drinking Water Regulations; <http://water.epa.gov/drink/contaminants/index.cfm>

[4] California Department of Public Health Maximum Contaminant Levels;
<http://www.cdph.ca.gov/certlic/drinkingwater/Pages/Chemicalcontaminants.aspx>

[1] USEPA Human Health Benchmarks for Pesticides; <http://iaspub.epa.gov/apex/pesticides/f?p=HHBP:home:1641119412947801>

[2] USEPA 2012 Edition of the Drinking Water Standards and Health Advisories;
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[4] California Department of Public Health Maximum Contaminant Levels;
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