



California Regional Water Quality Control Board Central Valley Region

Karl E. Longley, ScD, P.E., Chair



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18 March 2009

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REVIEW OF 2008 ANNUAL MONITORING REPORT -- CALIFORNIA RICE COMMISSION

The California Regional Water Quality Control Board, Central Valley Region (Central Valley Water Board) received the 2008 Annual Monitoring Report (AMR) from the California Rice Commission (CRC) on 30 December 2008. This report was submitted to meet the conditions of Monitoring and Reporting Program (MRP) Order R5-2007-0835 and the associated *Conditional Waiver of Waste Discharge Requirements for Discharges from Irrigated Lands* adopted by the Central Valley Water Board on 1 July 2006 (Resolution R5-2006-053). We appreciate CRC submitting the AMR by the required deadline.

Central Valley Water Board staff review of the AMR is in the attached memorandum. The review found three items that required missing lab data sheets or corrected information in the report. Two of the three items are closed. Please submit the missing glyphosate lab data sheets to close the last item by 17 April 2009.

Two additional items refer to quality control (QC) data for analytical methods. The new Quality Assurance Project Plan (QAPP) required by MRP Order R5-2007-0835 specifies that QC information for non-EPA specified analytical methods be obtained prior to analyses to validate and qualify the method. These QAPP changes are listed in the attached memorandum as well.

If you have any questions or comments regarding the attached review or the submittal of required documents, please contact Karen Larsen at 916-464-4646, or Margaret Wong at mawong@waterboards.ca.gov, or 916-464-4857.

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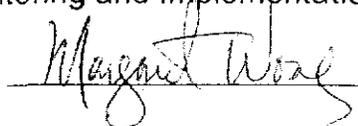
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TO: Karen Larsen
Sr. Environmental Scientist
Monitoring and Implementation Unit

FROM: Margaret Wong
Water Resource Control Engineer
Monitoring and Implementation Unit

DATE: 16 March 2009

SIGNATURE: 

REVIEW OF 2008 ANNUAL MONITORING REPORT -- CALIFORNIA RICE COMMISSION

On 30 December 2008, the California Rice Commission (CRC) submitted its Annual Monitoring Report (AMR) as required by CRC Monitoring and Reporting (MRP) Order No. R5-2007-0835. The CRC consolidated reporting by including the submittal the monitoring and reporting required by the Rice Pesticide Program (RPP) in Resolution No. R5-2007-0018.

ADMINISTRATIVE ASPECTS

The AMR was evaluated for the presence and completeness of the components described in the MRP Order. In general, the required components of the AMR were completely and satisfactorily addressed by the CRC. Items that needed to be addressed are noted below.

Item 1: The analyses for glyphosate were subcontracted to North Coast Laboratories by EMA, the CRC's primary lab for pesticide analyses. Copies of the North Coast Laboratories analytical sheets for glyphosate and the associated QA/QC data must be submitted to validate the reported data. The glyphosate results also do not list the analytical method used.

Note: This item was requested and has not been received.

Item 2: The EMA pesticide lab sheets for the 3 June 2008 sampling event are missing. The glyphosate results were reported by EMA on lab sheets, but lab sheets for the other pesticides analyzed are missing. Table 5-14 notes that propanil, triclopyr and clomazone were detected at monitoring sites for the 3 June sampling event.

Note: This item is closed. The analytical lab sheets for the 3 June 2008 sampling event were received.

Item 3: Table 5-11 has errors regarding what pesticides are used on rice and/or other crops. The last two columns need to be reviewed for accuracy.

Note: This item is closed. A revised Table 5-11 was received.

ANALYTICAL ASPECTS

Staff reviewed laboratory report results, including quality control results, for accuracy and completeness. The items also include comments relating to the discussion and interpretations of the results.

Item 4: Quality control information for non-EPA specified analytical methods, whether new, modified, or alternative, must be submitted to validate the accuracy and precision of the laboratory data. Without the supplementary QC data for the method, all data will be noted as "qualified". This item was noted in the 2006 and 2007 AMRs and remains an outstanding item that needs to be addressed.

Note: This item has been discussed extensively and should be corrected with the submission and adherence to the new Quality Assurance Project Plan (QAPP) as specified in MRP Order R5-2009-0809.

SUPPLEMENTARY ANALYTICAL DATA

During discussion of the 2009 MRP, it was agreed that additional monitoring data for propanil would be submitted in the 2008 AMR. The data would be evaluated for its adequacy to support the elimination of propanil from the list of pesticides to be analyzed in 2010.

Item 5: Examination of the propanil monitoring data raises the question of validation for the analytical method. The EPA method listed for propanil is Method 632, but the laboratory used Method 8081A for propanil analyses. Additional data are required to validate that the alternative method used meets the EPA requirements for quality control. Without the quality control data, the analytical results can only be reported as "qualified".

CLOSURE OF AMR REVIEW ITEMS

The CRC and their contractor, CH2MHill, were notified of several of the above items in order to facilitate closure. Items #2 and #3 are closed since the missing lab sheets and a corrected Table 5-11 were sent electronically on 5 February 2009. Item #4 should be corrected with the new QAPP. Item #1 will require submission of original laboratory data sheets from North Coast Laboratories. Item #5 will be discussed with CRC and Central Valley Water Board staff on possible next steps.

QAPP MODIFICATIONS

MRP Order R5-2009-0809 specifies that a new QAPP be submitted by 17 April 2009. Required changes to the 2004 QAPP that will affect monitoring and analyses in 2009 include:

- The algae toxicity testing shall not include treatment with a chelating agent such as EDTA (Attachment C.4.9(d)).
- Performance-based method validation package and Standard Operating Procedures (SOPs) are required for alternative analytical method (Attachment C.4.9(f)).
- Test acceptability criteria for toxicity tests should conform to Attachment C.5.4.
- Quality objectives and criteria including quantitation limit (QL) and method detection limit (MDL) are specified (Attachment C.4.3.1).

I appreciate the efforts by the CRC and their consultant, CH2MHill, to supply missing information and answer questions raised in the AMR review. The AMR has steadily improved in format and content. Resolving the last few items is expected by the next MRP Order.