

5-27-2014
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 MAY 27 2014

Attachment E – Notice of Intent

WATER QUALITY ORDER NO. 2013-0002-DWQ
 GENERAL PERMIT NO. CAG990005

DIVISION OF WATER QUALITY

STATEWIDE GENERAL NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM
 (NPDES) PERMIT FOR RESIDUAL AQUATIC PESTICIDE DISCHARGES TO WATERS OF
 THE UNITED STATES FROM ALGAE AND AQUATIC WEED CONTROL APPLICATIONS

I. NOTICE OF INTENT STATUS (see Instructions)

Mark only one item A. New Applicator B. Change of Information: WDID# 6 36AP00001
 C. Change of ownership or responsibility: WDID# _____

II. DISCHARGER INFORMATION

A. Name <u>GVL Recreation</u>			
B. Mailing Address <u>PO Box 8431</u>			
C. City <u>Green Valley Lake</u>	D. County <u>San Bernardino</u>	E. State <u>California</u>	F. Zip <u>92341</u>
G. Contact Person <u>Kevin Floyd</u>	H. E-mail address <u>KevinVision1@yahoo.com</u>	I. Title <u>Lake Manager</u>	J. Phone <u>909 855-7940</u>

III. BILLING ADDRESS (Enter Information only if different from Section II above)

A. Name			
B. Mailing Address			
C. City	D. County	E. State	F. Zip
G. E-mail address	H. Title	I. Phone	

IV. RECEIVING WATER INFORMATION

A. Algaecide and aquatic herbicides are used to treat (check all that apply):

1. Canals, ditches, or other constructed conveyance facilities owned and controlled by Discharger.
Name of the conveyance system: _____

2. Canals, ditches, or other constructed conveyance facilities owned and controlled by an entity other than the Discharger.
Owner's name: _____
Name of the conveyance system: _____

③ Directly to river, lake, creek, stream, bay, ocean, etc.
Name of water body: Green Valley Lake

B. Regional Water Quality Control Board(s) where treatment areas are located
(REGION 1, 2, 3, 4, 5, ⑥7, 8, or 9): Region Lakeland
(List all regions where algaecide and aquatic herbicide application is proposed.)

V. ALGAECIDE AND AQUATIC HERBICIDE APPLICATION INFORMATION

A. Target Organisms: Filamentous, Benthic + Planktonic Algae
Aquatic Weeds: Sage Pond Weed, Eurasian Milfoil + Naiads

B. Algaecide and Aquatic Herbicide Used: List Name and Active ingredients
2,4-D, Copper Chelated, Copper sulfate, Diquat Dibromide
Endothal, Fluridone, Glyphosate, Imazamox, Imazapyr
Penoxsulam, Sodium carbonate Peroxyhydrate
Triclopyr

C. Period of Application: Start Date May 1st 2014 End Date Sept 2014

D. Types of Adjuvants Used: 2,4-D, Diquat Dibromide, Glyphosate, Imazamox
Imazapyr, Triclopyr

VI. AQUATIC PESTICIDE APPLICATION PLAN

Has an Aquatic Pesticide Application Plan been prepared and is the applicator familiar with its contents?
 Yes No

If not, when will it be prepared? _____

VII. NOTIFICATION

Have potentially affected public and governmental agencies been notified? Yes No

VIII. FEE

Have you included payment of the filing fee (for first-time enrollees only) with this submittal?
 YES NO NA

IX. CERTIFICATION

"I certify under penalty of law that this document and all attachments were prepared under my direction and supervision in accordance with a system designed to ensure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine or imprisonment. Additionally, I certify that the provisions of the General Permit, including developing and implementing a monitoring program, will be complied with."

A. Printed Name: Kevin Floyd

B. Signature: *Kevin Floyd*

Date: 5/17/14

C. Title: Lake Manager GVL Rec.

XI. FOR STATE WATER BOARD STAFF USE ONLY

WDID:	Date NOI Received:	Date NOI Processed:
Case Handler's Initial:	Fee Amount Received: \$	Check #:
<input type="checkbox"/> Lyris List Notification of Posting of APAP	Date _____	Confirmation Sent _____

GVL Recreation, Inc.

Aquatic Pesticide Application Plan (APAP)

For the

**Statewide General National Pollutant Discharge Elimination
System (NPDES) Permit for Residual Aquatic Pesticide Discharges
To Waters of the United States from Algae and Aquatic Weed**

Control Applications

Water Quality Order No 2013-0002-DWQ

General Permit # CAG990005

Prepared for:
GVL Recreation, Inc.
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Contact: Kevin Floyd
(909)855-7940

Prepared by:
Arch Chemicals Inc. d/b/a Marine Biochemists
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Anaheim, CA 92806
Contact: Curt Cress
(714)632-5253

Submitted to:
State Water Resources Control Board
1001 I Street
Sacramento, CA 95814
(916)323-5598

CERTIFICATION

"I certify under penalty of law that this document and all attachments were prepared under my direct supervision in accordance with a system designed to insure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment".

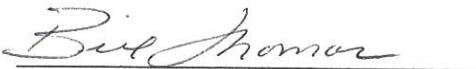
Signed and Agreed:



Kevin Floyd
Manager
GVL Recreation, Inc.



Curt Cress
Project Biologist
Arch Chemicals Inc. d/b/a Marine Biochemists



Bill Thomas
Pest Control Advisor #73763
Arch Chemicals Inc. d/b/a Marine Biochemists

GVL Recreation, Inc.

Aquatic Pesticide Application Plan

Statewide General National Pollutant Discharge Elimination System (NPDES) Permit for
Residual Aquatic Pesticide Discharges to Waters for the United States from
Algae and Aquatic Weed Control Applications
Water Quality Order No. 2013-0002-DWQ
General Permit # CAG990005

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Aquatic Pesticide Application Plan

IN March 2001, the State Water Resources Control Board (SWRCB) prepared Water Quality Order # 2001-12-DWQ which created Statewide General National Pollutant Discharge Elimination System (NPDES) Permit # CAG990003 for the discharges of aquatic herbicides to waters of the United States. The purpose of Order # 2001-12-DWQ was to minimize the areal extent and duration of adverse impacts to beneficial uses of water bodies treated with aquatic herbicides. The purpose of the general permit was to substantially reduce the potential discharger liability incurred for releasing water treated with aquatic herbicides into waters of the United States. The general permit expired January 31, 2004.

On May 20, 2004 the SWRCB adopted the statewide general NPDES Permit for Discharge of Aquatic Pesticides for Aquatic Weed Control in Waters of the United States #CAG 990005. Dischargers were required to have the general permit to perform aquatic herbicide applications. In May 2009, the general permit expired, but was administratively continued until November 30, 2013.

The Statewide General NPDES Permit for Residual Aquatic Pesticide Discharges to Waters of the United States from Algae and Aquatic Weed Control applications was adopted on March 5, 2013 and became available on December 1, 2013. The Permit requires compliance with the following:

- The policy for Implementation of Toxics Standards for Inland Surface Waters, Enclosed Bays, and Estuaries in California, a.k.a. the State Implementation Plan, or SIP (SWRCB 2000)
- The California Toxics Rule (CTR)
- Applicable Regional Water Quality Control Board (RWQCB) Basin Plan Water Quality Objectives (WQO's) (CVRWQCB 2003)

Coverage under the Permit is available to single dischargers and potentially to regional dischargers for releases of potential and/or actual pollutants to waters of the United States. Dischargers eligible for coverage under the Permit are public entities that conduct resource or pest management control measures, including local, state, and federal agencies responsible for control of algae, aquatic weeds, and other organisms that adversely impact operation and use of drinking water reservoirs, water conveyance facilities, irrigation canals, flood control channels, detention basins and/or natural water bodies.

The Permit does not cover indirect or non-point source discharges, whether from agricultural or other applications of pesticides to land, that may be conveyed in storm water or irrigation runoff. The Permit only covers algacides and aquatic herbicides that are applied according to label directions and that are registered for use on aquatic sites by the California Department of Pesticide Regulation (DPR).

Green Valley Lake is located in the San Bernardino Mountains. The two closest neighboring towns are Arrowbear and Running Springs. The lake is set at an elevation of 7,200 feet (2,195m), and is 9 surface acres. The lake was artificially created in 1926 with the construction of the Green Valley Dam. The lake is not connected to any stream or river and is only fed by rain and snow.

Nuisance algae and aquatic vegetation growing in Green Valley Lake adversely impacts lake operations. A swimming lagoon is negatively impacted by nuisance submerged aquatic weeds and for safety reasons requires seasonal control. Boat rental slips can become entangled with excessive aquatic plants and summer algae blooms also can negatively impact summer lake operations.

Using Integrated Pest Management (IPM) techniques, GVL Recreation, Inc intends to apply algaecides and aquatic herbicides identified in the Notice of Intent to Comply (NOI).

This **Aquatic Pesticide Application Plan (APAP)** is a comprehensive plan developed by GVL Recreation, Inc and describes the project, and what may be done to reduce water quality impacts, and how those impacts will be monitored. Specifically, this APAP contains the following eleven (11) elements.

1. Description of the water system to which algaecides and aquatic herbicides are being applied;
2. Description of the treatment area in the water system;
3. Description of types of weed(s) and algae that are being controlled and why;
4. Algaecide and aquatic herbicide products or types of algaecides and aquatic herbicides expected to be used and if known their degradation byproducts, the method in which they are applied, and if applicable, the adjuvants and surfactants used;
5. Discussion of the factors influencing the decision to select algaecide and aquatic herbicide applications for algae and weed control;
6. If applicable, list the gates or control structures to be used to control the extent of receiving waters potentially affected by algaecide and aquatic herbicide application and provide an inspection scheduled of those gates or control structures to ensure they are not leaking;
7. Description of monitoring program;
8. Description of procedures used to prevent sample contamination from persons, equipment, and vehicles associated with algaecide and aquatic herbicide application;
9. Description of the Best management Practices (BMPs) to be implemented. The BMPs shall include, at a minimum;

- Measures to prevent algaecide and aquatic herbicide spill and for spill containment during the event of a spill;
- Measures to ensure that only an appropriate rate of application consistent with product label requirements is applied for the targeted weeds or algae;
- The Discharger's plan in educating its staff and algaecide and aquatic herbicide applicators on how to avoid any potential adverse effects from the algaecide and aquatic herbicide applications;
- Discussion on planning and coordination so that beneficial uses of the water are not impacted during the treatment period; and
- A description of measures that will be used for preventing fish kill when algaecides and aquatic herbicides will be used for algae and aquatic weed controls.

10. Examination of Possible Alternatives. Dischargers should examine the alternatives to algaecide and aquatic herbicide use to reduce the need for applying algaecides and herbicides. Such methods include:

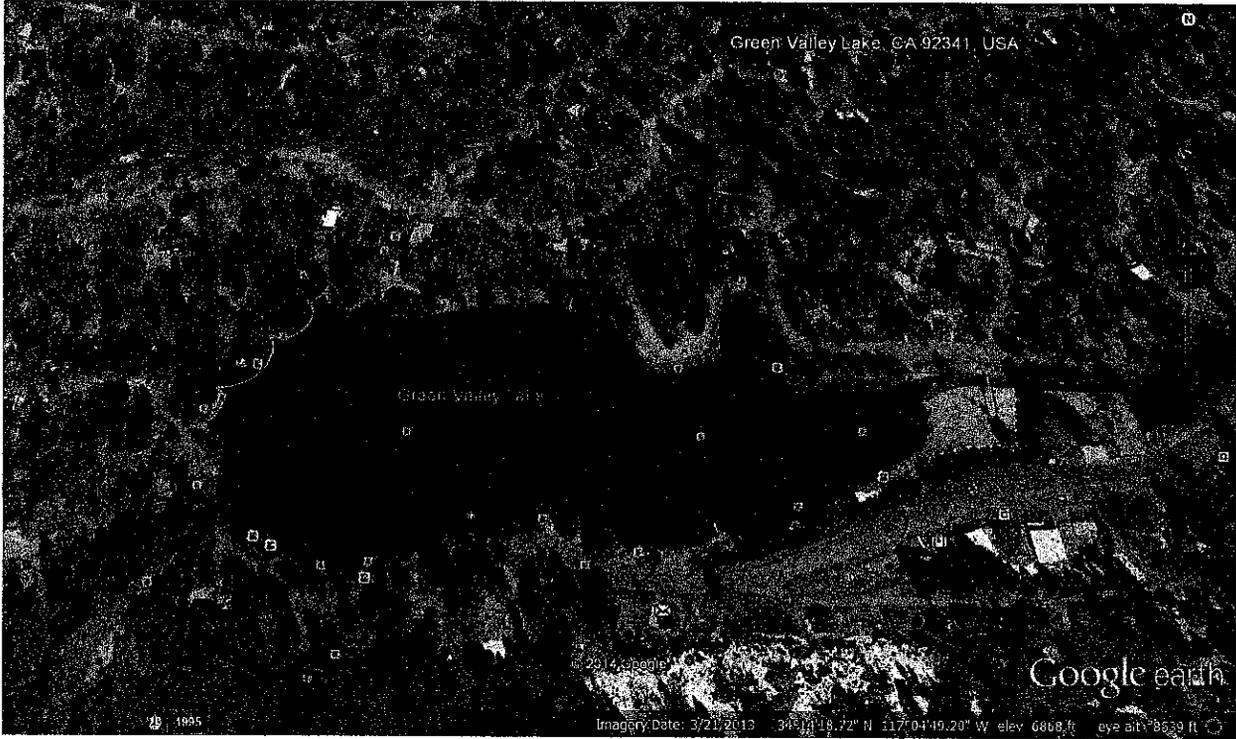
- Evaluating the following management options, in which the impact to water quality, impact to non-target organisms including plants, algaecide and aquatic herbicide resistance, feasibility, and cost effectiveness should be considered:
 - No action;
 - Prevention;
 - Mechanical or physical methods;
 - Cultural methods;
 - Biological control agents; and
 - Algaecides and aquatic herbicides

If there are no alternatives to algaecides and aquatic herbicides, dischargers shall use the minimum amount of algaecides and aquatic herbicides that is necessary to have an effective control program and is consistent with the algaecide and aquatic herbicide product label requirements.

- Using the least intrusive method of algaecide and aquatic herbicide application; and
- Applying a decision matrix concept to the choice of the most appropriate formulation.

This APAP is organized to address the aforementioned elements.

Green Valley Lake - 34°14'27" N 117°4'38" W



Element 1: Description of the Water System

Green Valley Lake is located in the San Bernardino Mountains in San Bernardino County. The two closest neighboring towns are Arrowbear and Running Springs. The lake is set an elevation of 7,200 feet and was artificially created in 1926 with the construction of the Green Valley Dam and makes the lake approximately 9 acres in size. The lake is not connected to any stream or river and is only fed by rain and snow. Fish are regularly stocked from May – August and freezes over the winter. The lake is used for recreational fishing, boating and swimming during summer months.

Element 2: Description of the Treatment Area

GVL Recreation Inc., may apply algaecides or aquatic herbicides to the lake described in Element 1 if aquatic weeds or algae treatment thresholds are met.

Element 3: Description of Weeds and Algae

Algal species found growing in the lake include various species of filamentous, benthic and planktonic algae. Various species of submerged aquatic weeds including sago pond weed, Eurasian milfoil and naiads may be found growing seasonally in the lake. The presence of algae and other aquatic weeds reduces the water quality, clarity and may create a safety hazard to swimmers using the swimming lagoon. Excessive submerged plants may interfere with boating operations and mooring areas for boat rentals.

Element 4: Algaecides and Aquatic Herbicides Used, Known Degradation Byproducts, Application Methods and Adjuvants

Table 1 summarizes the algaecides and aquatic herbicides that may be used by GVL Recreation Inc.

Table 1: Algaecides and Aquatic Herbicides That May be Used

Herbicide	Application Method	Adjuvant
2,4-D	Granular Spreader or sprayer	Aquatic labeled adjuvants
Copper – Chelated	Sprayer or injection boom	Not Applicable
Copper Sulfate	Sprayer or injection boom	Not Applicable
Diquat Dibromide	Sprayer or injection boom	Aquatic labeled adjuvants
Endothall	Sprayer, injection boom or granular spreader	Not Applicable
Fluridone	Injection boom or spreader	Not Applicable
Glyphosate	Power or backpack sprayer	Aquatic labeled adjuvants
Imazamox	Backpack sprayer	Aquatic labeled adjuvants
Imazapyr	Backpack sprayer or power sprayer	Aquatic labeled adjuvants
Penoxsulam	Backpack sprayer or power sprayer	Not Applicable
Sodium Carbonate Peroxyhydrate	Boom injector or spreader	Not Applicable
Triclopyr	Backpack sprayer or power sprayer	Aquatic labeled adjuvants

As required, aquatic-labeled adjuvants may be used to enhance the efficacy of an herbicide.

All herbicide applications are made in accordance with the product label.

Element 5: Discussion of Factors Influencing Herbicide Use

Treatment of aquatic vegetation and algae is determined by the application of IPM. One of the primary operational goals of the IPM program is to establish a general and reasonable set of control measures that not only aid in managing aquatic vegetation populations, but also address public health & safety, economic, legal, and aesthetic requirements. An action threshold level is

the point at which action should be taken to control aquatic vegetation before the water body is significantly impacted; moreover, established action threshold levels may change based on public expectations. A central feature of IPM is to determine when control action is absolutely necessary and when it is not, for the presence of some aquatic vegetation species may be a sign of a well-balanced, flourishing ecosystem. Examples of when or how thresholds are met are when algae or aquatic vegetation causes complaints with odor or creates a nuisance or safety concerns with swimming activities. Typical problems associated with aquatic vegetation or algae blooms are adverse impacts to water quality and nuisance odors. If vegetation or algae equals or exceeds a threshold, a control method is implemented. Control methods may include mechanical, cultural controls, biological, and/or chemical, consistent with the IPM techniques. Algaecide and aquatic herbicide use may or may not be employed as a last resort control method, and is considered a critical part of the IPM program. For some aquatic weed varieties, herbicides offer the most effective control; sometimes, they may be the only control available.

Algaecide and aquatic herbicide applications may also be made prior to threshold exceedance. For example, based on predicted growth rate and density, historical algae and aquatic weed trends, weather, water flow, and experience, aquatic weeds or algae may reasonably be predicted to cause future problems. Accordingly, they may be treated soon after emergence or when appropriate based on the algaecide and aquatic herbicide to be used. Even though algae and aquatic weeds may not be an immediate problem at this phase, treating them before they mature reduces the total amount of algaecide and aquatic herbicide needed because the younger aquatic weeds are more susceptible and there is less biomass to target. Furthermore, treating aquatic weeds and algae within the ideal time frame of its growth cycle ensures that the selected control measures will be most effective. Managing aquatic weed populations before they produce seeds, tubers or other reproductive organs is an important step in a comprehensive aquatic weed control program. Generally, treating algae or aquatic weeds earlier in the growth cycle results in fewer controls needed and less total herbicide uses. Selection of appropriate algaecide and aquatic herbicide(s) and rate of application is done based on the identification of the algae and aquatic weed, its growth state and the appearance of that algae or aquatic weed on the product label.

The selection of the decision to use an algaecide or aquatic herbicide is based on the recommendation of a California Department of Pesticide Regulation licensed Pest Control Adviser (PCA). The PCA considers a variety of control options that may include mechanical and/or cultural techniques that alone or in combination with algaecide or aquatic herbicide use are the most efficacious and protective of the environment.

Evaluating alternative control techniques is part of GVL Recreation, Inc.'s approach; therefore an alternative treatment may be selected as part of test program. Alternative control techniques include mechanical removal, native species establishment or enhancement of aeration/circulation methods to help improve water quality.

In general, some alternative control techniques are more expensive, labor intensive, not as effective, may cause temporary water quality degradation, and/or further spread algae or aquatic weeds. The equipment and labor required to perform these techniques is not always readily available. This may cause delays in removal leading to increased plant material to remove and increased cost.

Element 6: Gates and Control Structures

As applicable or necessary, controllable gate structures will be closed during an algaecide or aquatic herbicide application to control the extent, if any, that receiving waters will be affected by residual algaecides or aquatic herbicides.

Element 7: Description of Monitoring Program

The attachment to the Permit presents the Monitoring and Reporting Program (MRP). The MRP addresses two key questions:

- Does the residual algaecides and aquatic herbicides discharge cause and exceedance of the receiving water limitations?
- Does the discharge of residual algaecides and aquatic herbicides, including active ingredients, inert ingredients, and degradation byproducts, in any combination cause or contribute to an exceedance of the “no toxics in toxic amount” narrative toxicity objective?

7.1 Data Collection

Visual monitoring will be performed for all algaecide and aquatic herbicide applications and be recorded by qualified personnel. A copy of the Application Report is attached to the program.

7.2 Monitoring Locations and Frequency

Water quality sampling for glyphosate will be conducted for one application event from each environmental setting (flowing water and nonflowing water) per year. No water quality sampling is required for applications of products that contain sodium carbonate peroxyhydrate. For application of all other algaecides and aquatic herbicides listed on the permit, samples will be collected from a minimum of six application events for each active ingredient in each environmental setting per year. If there are less than six application events in a year for an active ingredient, GVL Recreation, Inc and/or it's agent (Marine Biochemists) will collect samples for each application event in each environmental setting.

If the results from six consecutive sampling events show concentrations that are less than the applicable receiving water limitation/trigger in an environmental setting, GVL Recreation, Inc. will reduce the sampling frequency for that active ingredient to one per year in that environmental setting. If the annual sampling shows exceedances of the applicable receiving water limitation/trigger, GVL Recreation, Inc. will be required to return to sampling six applications the next year, and until sampling may be reduced again.

Sites will be chosen to represent the variations in treatment that occur, including algaecide or aquatic herbicide use, hydrology, and environmental setting, conveyance or impoundment type, seasonal, and regional variations.

7.2.1 Sample Locations

Sampling will include background, event, and post-event monitoring as follows:

Background monitoring: In static water, the background (BG) sample is collected in the treatment area, within 24 hours prior to the start of the application.

Event Monitoring: the Event sample for non-flowing (static) water is collected immediately outside the treatment area immediately after the application event, but after sufficient time has elapsed such that treated water would have exited the treatment area.

The location and timing for the collection of the Event sample may be based on a number of factors including, but not limited to algae and aquatic weed density and type, flow rates, size of the treatment area and duration of treatment.

Post-Event Monitoring: The post-event monitoring (Post) sample is collected within the treatment area within one week after the application, or when the treatment is deemed complete.

One full set of three samples (i.e., BG, Event and Post) will be collected during each treatment from the representative site(s) treated according to the monitoring frequency and locations described earlier.

Additionally, one Field Duplicate (FD) and one Field Blank (FB) will be collected and submitted for analysis for each analyte, once per year. The FD and FB samples will most likely be collected during Event Monitoring.

7.3 Sample Collection

If the water depth is 6 feet or greater the sample will be collected at a depth of 3 feet. If the water depth is less than 6 feet the sample will be collected at the approximate mid-depth. As necessary, an intermediary sampling device will be used for locations that are difficult to access. Sampling containers will be inverted before being lowered into the water to the desired sample depth, where it will be turned upright to collect the sample.

7.4 Field Measurements

In conjunction with sample collection, temperature will be measured in the field. Turbidity, electrical conductivity, pH, and dissolved oxygen may be measured in the field using field meters as available, or analyzed in the laboratory. Turbidity, pH, and dissolved oxygen meters are calibrated according to manufacturer's specifications at the recommended frequency, and checked with a standard prior to each use. Conductivity meters are calibrated by the manufacturer and will be checked according to manufacturer's specifications with standards

throughout the year to evaluate instrument performance. If the calibration is outside the manufacturer's specifications, the conductivity probe will be recalibrated. Calibration logs are maintained for all instruments to document calibration.

7.5 Sample Preservation and Transportation

Samples may be collected directly into preserved containers, or collected in unpreserved containers, and preserved at the laboratory upon receipt if the analytical method requires preservation. Once a sample is collected and labeled it will immediately be placed in a dark, cold cooler with ice. Delivery to the laboratory should be as soon as practicable after sample collection.

7.6 Sample Analysis

Table 2 shows the constituents that each sample must be analyzed for.

Table 2: Required Sample Analysis

Analyte	EPA Method	Reporting Limit	Hold Time (Days)	Container	Chemical Preservative
Temperature ¹	N/A	N/A	N/A	N/A	N/A
Dissolved Oxygen ¹	360.1 or 360.2	0.0 mg/l	1	1L Amber Glass	None
Turbidity ²	180.1	0.00 NTU	2	100 mL HDPE	None
Conductivity ²	120.1	0 µS/cm	28	100 mL HDPE	None
pH ²	150.1 or 150.2	1-14	Immediately	100 mL HDPE	None
Nonylphenol ³	550.1	0.5µg/L	7	2x40 mL VOA	None
Hardness ⁴	SM2340B	0.7 CaCo ³ /L	1 day unpreserved; 180 days if preserved	250 mL HDPE	HNO ³
*2,4-D	8151,8150A, 615	0.5 µ/L	7	1L Amber Glass	None
*Copper (dissolved)	200.8	0.5 µ/L	1 day unpreserved; 180 days if preserved	250 mL HDPE	HNO ³
*Triclopyr	8151, 8150A, 615	0.5 µ/L	7	1L amber Glass	None
*Diquat	549	40 µ/L	7	500 mL Amber HDPE	H ₂ SO ₄
*Endothall	548.1	40 µ/L	7	100 mL Amber Glass or 2x40 mL VOA	None
*Fluridone	SePro FasTest, HPLC	1 µ/L	7	30 mL Amber HDPE	None
*Glyphosate	547	0.5 µ/L	14	2x40 mL VOA	None
*Imazamox	HPLC	50 µ/L	14	2x40 mL VOA	None
*Imazapyr	532m	100 µ/L	14	1 L Amber Glass	None
*Penoxsulam	532m	20 µ/L	7	1 L Amber Glass	None

Notes:

*Signifies algaecide or aquatic herbicide active ingredient. Chemical analysis is only required for the active ingredients(s) used in treatment.

Analysis not required for algaecides and aquatic herbicides containing sodium carbonate Peroxyhydrate.

EPA Methods are taken from NEMI 2004

1 – Field Measured

2- May be field or laboratory measured

3 – Required only when a nonlyphenol-based surfactant is used

4 – Required for copper applications only

HPLC – High Performance Liquid Chromatography

m – Modified extraction or analysis technique

7.7 Reporting Procedures

An annual report for each reporting period, from January 1 to December 31 will be prepared by march 1 of the following year and will be submitted to the appropriate RWQCB. In years when o algaecides or aquatic herbicides are used, a letter stating no applications will be sent to the appropriate RWQCB in lieu of an annual report.

The annual report will contain the following information as described in Attachment C of the Permit:

1. An Executive Summary discussing compliance or violation of the Permit and the effectiveness of the APAP; and
2. A summary of monitoring data, including the identification of water quality improvements or degradation as a result of algaecide or aquatic herbicide application.

GVL Recreation, Inc. and/or it's agent will collect and retain all information of the previous reporting year. When requested by the Deputy Director or Executive Officer of the applicable RWQCB, the Water Company will submit the annual information collected, including:

1. An Executive Summary discussing compliance or violation of the Permit and the effectiveness of the APAP to reduce or prevent the discharge of pollutants associated with herbicide applications;
2. A summary of monitoring data, including the identification of water quality improvements or degradation as a result of algaecide or aquatic herbicide application, if appropriate, and recommendations for improvement to the APAP (including proposed BMP's) and monitoring program based on the monitoring results. All receiving water monitoring data shall be compared to applicable receiving water limitations and receiving water monitoring triggers;
3. Identification of BMPs and a discussion of their effectiveness in meeting the Permit requirements;
4. A discussion of BMP modifications addressing violations of the Permit;
5. A map showing the location of each treatment area;
6. Types and amounts of aquatic herbicides used at each application event during each application
7. Information on surface area and/or volume of treatment area and any other information used to calculate dosage, concentration, and quantity of each aquatic herbicide used;

8. Sampling results shall indicate the name of the sampling agency or organization, detailed sampling location information (including latitude and longitude or township/range/section if available), detailed map or description of each sampling area (address, cross roads, etc.), collection date, name of constituent/parameter and its concentration detected, minimum levels, method detection limits for each constituent analysis, name or description of water body sampled, and a comparison with applicable water quality standards, description of analytical QA/quality control plan. Sampling results shall be tabulated so that they are readily discernible; and

9. Summary of Aquatic Herbicide Application Logs (AHALs)

GVL Recreation, Inc. and/or its agent will report to the SWRCB and appropriate RWQCB any noncompliance, including any unexpected or unintended effect of an algaecide or aquatic herbicide that may endanger health or the environment the Twenty-Four Hour Report will be provided orally, by way of a phone call, to the SWRCB and appropriate RWQCB within 24 hours from the time GVL Recreation, Inc. and/or its agent becomes aware of any noncompliance. The Twenty-Four Hour Report will include the following information:

1. The caller's name and telephone number;
2. Applicator name and mailing address;
3. Waste Discharge Identification (WDID) number;
4. How and when the District became aware of the noncompliance;
5. Description of the location of the noncompliance;
6. Description of the noncompliance identified and the USEPA pesticide registration number for each product the District applied in the area of the noncompliance; and
7. Description of the steps that the District has taken or will take to correct, repair, remedy, cleanup, or otherwise address any adverse effects.

If GVL Recreation, Inc. and/or its agent is unable to notify the SWRCB and appropriate RWQCB within 24 hours, the Company will do so as soon as possible and provide a rationale for why the Company was unable to provide notification of noncompliance within 24 hours.

In addition to the Twenty-Four Hour Report, GVL Recreation, Inc. and/or its agent will provide a written submission within five (5) days of the time the Company becomes aware of the noncompliance. The Five-Day Written Report will contain the following information:

1. Date and time GVL Recreation, Inc. and/or its agent contacted the State Water Board and the appropriate Regional Water Board notifying of the noncompliance and any instructions received from the State and/or Regional Water Board; information required to be provided in Section D.1 (24-Hour Reporting);
2. A description of the noncompliance and its cause, including exact date and time and species affected, estimated number of individual and approximate size of dead or distressed organisms (other than the pests to be eliminated);
3. Location of incident, including the names of any waters affected and appearance of those waters (sheen, color, clarity, etc);
4. Magnitude and scope of the affected area (e.g. aquatic square area or total stream distance affected);

5. Algaecide and aquatic herbicide application rate, intended use site (e.g., banks, above, or direct to water), method of application, and name of algaecide and herbicide product, description of algaecide and herbicide ingredients, and U.S. EPA registration number;
6. Description of the habitat and the circumstances under which the noncompliance activity occurred (including any available ambient water data for aquatic algaecides and aquatic herbicides applied);
7. Laboratory tests performed, if any, and timing of tests. Provide a summary of the test results within five days after they become available;
8. If applicable, explain why GVL Recreation, Inc. and/or its agent believes the noncompliance could not have been caused by exposure to the algaecides or aquatic herbicides from the application;
9. Actions to be taken to prevent recurrence of adverse incidents.

The Five Day Written Report will be submitted within five (5) days of the time the Water Company becomes aware of the noncompliance unless SWRCB staff or Regional Water Board staff waive the above described report if an oral report has been received within 24 hours.

7.8 Sampling Methods and Guidelines

The purpose of this section is to present methods and guidelines for the collection and analysis of samples necessary to meet the APAP objective of assessing adverse impacts, if any, to beneficial uses of water bodies treated with algaecides and aquatic herbicides.

This section describes the techniques, equipment, analytical methods, and quality assurance and quality control procedures for sample collection and analysis. Guidance for the preparation of this chapter included: NPDES Storm Water Sampling Guidance Document; Guidelines and Specifications for Preparing Quality Assurance Project Plans; and U.S. Geological Survey, National Field manual for the Collection of Water Quality Data.

7.8.1 Surface Water Sampling Techniques

As discussed on 7.1.3, if the water depth is 6 feet or greater the sample will be collected at a depth of 3 feet, if the water depth is less than 6 feet the sample will be collected at the approximate mid-depth. As necessary, an intermediary sampling device will be used for locations that are difficult to access. Long-handled sampling poles with attached sampling container will be inverted before being lowered into the water to the desired sample depth, where it will be turned upright to collect the sample. Appropriate cleaning technique is discussed in section 7.8.4

During collection, the samples will be collected in a manner that minimizes the amount of suspended sediment and debris in the sample. Surface water grab samples will be collected directly by the sample container or by an intermediary container in the event that the sample container cannot be adequately or safely used. Intermediary samplers will be poly, stainless steel or glass. Any container that will be reused between sites will be washed thoroughly and triple rinsed before collection of the net sample. Alternatively, disposable poly or glass intermediary sample containers can be used.

7.8.2 Sample Containers

Clean, empty sample containers with caps will be supplied in protective cartons or ice chests by the primary laboratory. The containers will be certified clean by either the laboratory or the container supplier. To ensure data quality control, the sampler will utilize the appropriate sample container as specified by the laboratory for each sample type. Sample container type, holding time, and appropriate preservatives are listed in Table 2. Each container will be affixed with a label indicating a discrete sample number for each sample location. The label will also indicate the date and time of sampling and the sampler's name.

7.8.3 Sample Preservation and Filtering

Samples may either be collected with bottles containing the correct preservatives(s), or collected in unpreserved bottles and preserved upon receipt at the analytical lab. If filtration is required, it must be done prior to sample preservation. After collection, samples will be refrigerated at approximately four degrees Celsius, stored in a dark place, and transported to the laboratory. Refer to table 2.

7.8.4 Sampling Equipment Cleaning

In the event that sampling equipment will be used in more than one location, the equipment will be thoroughly cleaned with a non-phosphate cleaner, triple-rinsed with distilled water, and then rinsed once with the water being sampled prior to its first use at a new sample collection location.

7.8.5 Sample packing and Shipping

All samples are to be packed and transported the day the samples are collected to provide ample time for samples to be analyzed within the required holding time.

Ice will be included in coolers containing samples that require temperature control and transported to the laboratory for analysis in the following manner:

1. Sample container stickers will be checked for secure attachment to each sample container.
2. The sample containers will be placed in the lined cooler.
3. The chain of custody (COC) will be placed inside a plastic bag and placed inside the cooler. The COC will indicate each unique sample identification name, time and place of sample collection, the sample collector, the required analysis, turn-around-time, and location to which data will be reported.
4. The cooler will then be readied for pick-up by a courier or delivered directly to the laboratory.

7.9 Field Sampling Operations

7.9.1 Field Logbook

A recording logbook must be maintained by members of the sampling team to provide a record of sample location, significant events, observations, and measurements taken during sampling. Sample records are intended to provide sufficient data and observations to enable project team members to reconstruct events that occurred during the sampling and must be legible, factual, detailed, and objective. As appropriate and at the discretion of GVL Recreation, Inc. and/or its agent staff, observations and measurements can be supplemented with pictures of site conditions at the time of sampling.

When recording observations in the field book, the sampling team will note the presence or absence of:

1. Floating or suspended;
2. Discoloration;
3. Bottom deposits;
4. Aquatic life;
5. Visible films, sheens, or coatings;
6. Fungi, slimes, or objectionable growths; and
7. Potential nuisance conditions.

7.9.2 Alteration of Sampling Techniques

It is possible that actual field conditions may require a modification of the procedures outlined herein. Specifically, water levels, weather, other environmental parameters and hazards including stream flow, rainfall, and irrigation water use may pose access and/or sampling problems. In such instances, variations from standard procedures and planned sampling locations and frequencies will be documented by means of appropriate entry into the field logbook.

7.9.3 Flow Estimation

Flow estimation measurements must be made for all moving water sampling locations. If feasible, a flow meter calibrated according to the manufacturer's directions may be placed as close to the center of the stream, creek or canal as possible and a reading taken in feet per second (ft/sec). Alternatively, a common floating object may be placed as close to the center of the conveyance as possible and the time it travels a known distance will be estimated and represented in ft/sec. A minimum travel distance of approximately 25 feet will be used.

7.9.4 Chain-of-Custody (COC)

The COC record will be employed as physical evidence of sample custody. The sampler will complete a COC record to accompany each sample shipment from the field to the laboratory. The COC will specify: time, date, location of sample collection, specific and unique sample number, requested analysis, sampler name, required turn-around-time, time and date of sample transaction between field and laboratory staff, preservative, if any, and name of receiving party at the laboratory.

Corrections to the COC will be made by drawing a line through, initialing, and dating the error, and entering the correct information. Erasures are not permitted.

Upon receipt of the samples, laboratory personnel will check to insure that the contents of the ice chest(s) are accurately described by the COC. Upon verification of the number and type of samples and the requested analysis, a laboratory representative will sign the COC, indicating receipt of the samples.

The COC record form will be completed in duplicate. Upon sample delivery, the original copy will be left with the laboratory and a copy will be kept by the sampler, and placed in the field logbook.

7.9.5 Sample Label

The label will contain information on the specific project, the individual sample ID, the date and time the sample was collected, and the name of the sampler. Prior to sampling, a water resistant label will be completed with waterproof ink and will be affixed to the appropriate container.

7.9.6 Corrections to Documentation

Documents will not be destroyed or thrown away, even if they are illegible or contain inaccuracies that require a replacement or correction. If an error is made on a document used by an individual, that individual will make corrections by making a line through the error and entering the correct information. The erroneous information will not be obliterated. Corrections will be initialed and dated.

7.9.7 Document Control

A central file location will be established and used to store documentation such as the filed logbook and laboratory date.

7.9.8 Sample Kit

Prior to departing to the field to collect samples, the following equipment will be prepared for use:

- Laboratory supplied sampling bottles (one set for each sample to be collected plus spares, plus QA/QC samples)
- Sample labels (one for each sample to be collected plus spares)
- Water-proof ink marker
- Chain of Custody forms
- Field logbook
- Flow meter (optional – for moving water applications)
- Zip lock bags for paperwork
- Non-phosphate cleaner

- Deionized or distilled water
- Ice or blue ice packs
- Clear Mailing Tape
- Cooler for samples
- Intermediary sampling device
- Gloves
- Rubber boots
- Stop or wrist watch
- Camera or cell phone with camera

7.10 Quality Assurance and Quality Control (QA/QC)

The purpose of quality assurance and quality control is to assure and control the quality of data generated during sample collection and analysis as described earlier in this document. Quality assurance and quality control are measured in a variety of ways, as described below.

7.10.1 Precision

Precision is a measure of the reproducibility of measurements under a given set of conditions. It is a quantitative measure of the variability of a group of measurements compared to the average value of the group and is expressed as the relative percent difference (RPD). Sources of error in precision can be related to both laboratory and field techniques. Specifically, lack of precision is caused by inconsistencies in instrument setting, measurement and sampling techniques, and record keeping.

Laboratory precision is estimated by generating analytical laboratory matrix spike (MS) and matrix spike duplicate (MSD) sample results and calculating RPD. In general, laboratory RPD values of less than 20% will be considered acceptable.

Field precision is estimated by collection field duplicates (FDs) in the field and calculating RPD. In general, field RPD values of less than 35% will be considered acceptable.

7.10.2 Accuracy

Accuracy is a measure of how close data are to their true values and is expressed as percent recovery (%R), which is the difference between the mean and the true value expressed as a percentage of the true value. Sources of error (inaccuracy) are the sampling process, field contamination, preservation, handling, sample matrix effects, sample preparation, analytical techniques, and instrument error.

Laboratory accuracy is estimated using reference standards, matrix spike and matrix spike duplicates samples. Acceptable accuracy is generally between 75 and 125%.

7.10.3 Completeness

Completeness is defined as the percentage of measurements made which are judged to be valid measurements. The completeness objective is that the sufficiently valid data is generated to allow for submittal to the SWRCB and RWQCB. Completeness will be assessed by comparing the number of valid sample results to the number of samples collected. The objective for completeness is 80%.

7.10.4 Representativeness

Representativeness refers to a sample or group of samples that reflects the predominant characteristics of the media at the sampling point. The objective in addressing representativeness is to assess whether the information obtained during the sampling and analysis represents the actual site conditions. Permit requirements of sampling each application at 10 % of all sites treated is assumed to meet the representativeness criteria.

7.10.5 Field Duplicate

The purpose of a field duplicate (FD) is to quantify the precision, or reproducibility, of the field sampling technique. It involves the duplication of the technique used for a particular field sample collection method and the subsequent comparison of the initial and duplicate values. This comparison is measured as the relative percent difference (RPD). RPD is calculated as follows:

$$\text{RPD} = [(\text{Sample 1} - \text{Sample 2}) / (\text{Average of Samples 1 and 2})] \times 100$$

An acceptable field RPD value is 35%

The FD is collected at the same time as the actual field sample and one FD per year will be collected.

7.10.6 Field Blank

The purpose of the field blank (FB) is to assure that the field sampling technique, equipment, or equipment cleaning technique or materials do not impact a false positive or negative result during the collection of the sample. A FB will be prepared with distilled water and allowed to come into contact with the sampling device in a manner identical to the actual sample. The only acceptable values for analytes in the FB is less than the detection limit for the compounds of interest, or an expected, previously determined, background value.

The FB will be collected at the same time as the actual field sample and one FB per year will be collected.

7.10.7 Laboratory Quality Assurance and Quality Control

Laboratory precision and accuracy will be monitored by a series of laboratory-generated quality control samples. As long as sufficient sample volume is collected and submitted to the laboratory, no additional effort is required by field activities to generate laboratory quality

control samples. Each set of field samples will have associated with it one each from the following set of laboratory quality control samples.

7.10.7.1 Method Blank

The purpose of the method blank (MB) is to assure that the analytical technique does not impart a false positive result during the preparation or analysis of the sample. A method blank will be prepared by the laboratory from high purity distilled or deionized water. The only acceptable values for analytes in the MB are zero or an expected, previously determined, background values.

7.10.7.2 Matrix Spike

The purpose of a matrix spike (MS) is to quantify accuracy and to assure that the analytical technique does not impart a false negative or positive result during the preparation or analysis of the sample. It involves the introduction of the analyte (or an analyte surrogate) of interest into the actual sample matrix and then quantitating it.

The amount detected divided by the amount added to the matrix is expressed as a percent recovery (%R). Acceptable values of %R range from 70% to 130%. Percent recovery is calculated as follows:

$$\%R = [(\text{Spike Amount Detected} - \text{Sample Value}) / \text{amount Spiked}] \times 100$$

7.10.7.3 Matrix Spike Duplicate

The purpose of a matrix spike duplicate (MSD) is to quantify laboratory precision. An acceptable RPD is less than or equal to 25%. The MSD involves duplication of the MS resulting in two data points from which relative percent difference (RPD) is calculated as follows:

$$\text{RPD} = [(\text{MS} - \text{MSD}) / (\text{Average of MS and MSD})] \times 100$$

7.10.8 Data Validation

Data validation will use data generated from the analytical laboratory and the field. References that can be used to assist in data validation include USEPA Contract Laboratory Program National Functional Guidelines for Inorganic Data Review (USEPA 1994) and USEPA Contract Laboratory Program National Functional Guidelines for Organic Data Review (USEPA 1999).

The purpose of data validation is to ensure that data collected are of sufficient quality for inclusion in reports to the RWQCB. In order to serve this purpose, the following information must be available in order to evaluate data validity:

1. Date of sample collection – required to uniquely identify sample and holding time.
2. Location of samples – required to identify sample

3. Laboratory QA/QC procedures – required to assess analytical accuracy, precision, and sample integrity. A laboratory QA/QC sample set consists of a MS, a MSD and a MB. A laboratory sample volume and number will be supplied to the laboratory in order to prepare and evaluate the laboratory QA/QC sample set.
4. Analytical methods – required to assess appropriateness and acceptability of analytical method used.
5. Detection limits – required to assess lower limit of parameter identification.
6. Holding times, preservation, and dates of extraction and analysis – required to assess if a sample was extracted and analyzed within the specified time limits and if a sample was stored at the appropriate temperature.
7. Field QA/QC procedures – required to assess field precision and sample integrity. A field QA/QC sample set consists of FB and FD samples. A field QA/QC sample set will be analyzed by the laboratory for one sampling event per year. Sufficient sample volume and number will be collected in the field and supplied to each laboratory in order to prepare and evaluate the field QA/QC sample set.

7.10.9 Data Qualification

Data collected for compliance with the permit will be qualified through the Analytical lab Validation process described in 7.10.7. This process will ensure all data has been thoroughly reviewed and qualified as valid. During the data validation process, data qualifiers will be used to classify sample data. The following qualifiers will be used:

A – Acceptable. The data have satisfied each of the requirements and are quantitatively acceptable and will be used in reports.

R – Reject. Data not valid. This qualifier will be used for samples that cannot be uniquely identified by date of collection or sample location or that fail holding time or, detection limit requirements. Invalid data will not be presented in reports submitted to the RWQCB.

7.10.10 Corrective Action

If previously described criteria for valid data are not met, then corrective action as follows will be taken:

1. The laboratory will be asked to check their quality assurance/quality control data and calculations associated with the sample in question. If the error is not found and resolved, then:
 - a. The extracts or the actual samples, which will be saved until the data are validated, will be reanalyzed by the laboratory if they are within holding time limitations. These new results will be compared with the previous results. If the error is not found and resolved, then:
 - b. If field analytical equipment is used, then calibration records will be reviewed. If the error is not found, then:
 - c. The sampling procedure and sample preparation will be re-checked and verified. If the procedures appear to be in order and the error is not resolved, then:

- d. The data will be deemed invalid and not used.
2. Upon discovery of the source of an error, every attempt will be made to address the cause of the error and remedy the problem.

7.10.11 Data Reporting

The results of sampling and analysis will be summarized in the Annual Report. The data will be tabulated so that they are readily discernible.

Element 8: Procedures to Prevent Sample Contamination

Sample collection will not be done in close proximity to application equipment and preferably upwind. Sampling will be done in a manner that prevents contact with algaecide or aquatic pesticide application equipment, containers, or personal protective equipment (PPE). Care will be taken by samplers to minimize contact with any treated water, vegetation, or application equipment.

In the event that sampling equipment will be used more than one location, the equipment will be thoroughly cleaned with a non-phosphate cleaner, triple-rinsed with uncontaminated water, and then rinsed once with the water being sampled prior to its first use at a new sample collection location. Gloves will be changed between sites.

Element 9: Description of BMP's

GVL Recreation, Inc. and/or its agent employs the following BMP's to ensure the safe, efficient and efficacious use of algaecides and aquatic herbicides.

9.1 Measures to Prevent Spills and Spill containment in the Event of a Spill

Applicators take care when mixing and loading algaecides and aquatic herbicides and adjuvants. All label language is followed to ensure safe handling and loading of algaecides and aquatic herbicides. Application equipment is regularly checked and maintained to identify and minimize the likelihood of leaks developing or failure that would lead to a spill.

If algaecides or aquatic herbicides are spilled, they will be prevented from entering any waterbodies to the extent practicable. Applicators are trained to contain any spilled material and are familiar with the use of absorbent materials such as kitty litter, and other spill containment materials. Spills will be cleaned up according to label instructions, and all equipment used to remove spills will be properly contained and disposed of or decontaminated, as appropriate. Applicators will report spills in a manner consistent with local, state and federal requirements.

9.2 Measures to ensure Appropriate Use Rate

GVL Recreation Inc.
Aquatic Pesticide Application Plan

The following BMPs help ensure the appropriate algaecide and aquatic herbicide application rate is used.

9.2.1 Site Scouting

Prior to treatment, GVL Recreation, Inc. or representative PCA will evaluate the extent to which acceptable algae or aquatic weed thresholds have been exceeded. Thresholds are based on nuisance odors, and interference with lake activities such as swimming, boating and fishing.

If a location is deemed to have exceeded a threshold, or given algae or aquatic weed population is anticipated to exceed a threshold based on site and weather conditions, historic aquatic weed growth, or other information, an algaecide or aquatic herbicide application is considered. If the application can be made without negatively impacting the water quality, then an application is made.

9.2.2 Written Recommendations Prepared by PCA

Prior to application, a PCA licensed by California Department of Pesticide Regulation (DPR) and/or qualified staff scout the area(s) to be treated, makes a positive identification of pest(s) present, checks applicable product label(s) for control efficacy, and the PCA prepares a written recommendation, including rates of application, and any warnings or conditions that limit the application so that non-target flora and fauna are not adversely impacted.

9.2.3 Applications made According to Label

All algaecide and aquatic herbicide applications are made according to the product label in accordance with regulations of the U.S. EPA, Cal EPA, Cal OSHA, DPR, and the local Agricultural Commissioner. GVL Recreation, Inc.'s PCA and DPR-licensed qualified applicator holders regularly monitor updates and amendments to the label so that applications are in accordance with label directions. Licensed QALs and QACs must complete 20 hours of continuing education every 2 years to stay licensed, and up-to-date on the latest techniques for pest control.

9.2.4 Applications Made by Qualified Personnel

GVL Recreation, Inc. and/or its agent will utilize QALs and QACs to make application or supervise applications recommended by the PCA. A QAC/QAL must make any applications of restricted use herbicides. Applicators will have knowledge of proper equipment loading, nozzle selection, calibration, and operations so that spills are minimized, precise application rates are made according to the label, and only target plants are treated.

9.3 Application Coordination to Minimize Impact of Application of Water Users

As required by the algaecide and aquatic herbicide label, water users potentially affected by any water use restrictions will be notified prior to an application being made. As necessary, gates, weirs, etc. will be closed to prevent discharge of residual algaecide or aquatic herbicides.

9.4 Description of Measures to Prevent Fish Kills

It is important to acknowledge that the use of aquatic herbicides and algaecides, even when used according to label instructions, may result in unavoidable fish kills. Nonetheless, measures will be taken to reduce the likelihood of fish kills as described below. Generally speaking, the concentration of residual aquatic herbicides and algaecides is not sufficiently high to result in fish kills.

9.4.1 Applications Made According to Label

All aquatic herbicide applications are made according to the product label in accordance with regulations of the U.S. EPA, Cal EPA, DPR, Cal OSHA and the local Agricultural Commissioner. Precautions on the product label to prevent fish kills will be followed. For example, limitations on the surface water area treated will be followed to prevent dead algae or aquatic weeds from accumulating and then decaying and subsequently depressing the dissolved oxygen level. Depressed oxygen levels may adversely impact fish populations.

9.4.2 Written Recommendations Prepared by PCA

Prior to application, a PCA licensed by DPR scouts the area to be treated, makes a positive identification of pest(s) present, checks applicable product label(s) for control efficacy, and prepares a written recommendation, including rates of application, and any warnings or conditions that limit the application so that fish are not adversely impacted.

9.4.3 Applications Made by Qualified Personnel

As appropriate, consistent with applicable regulations, GVL Recreation, Inc. will utilize QALs, QACs to make applications or supervise applications recommended by the PCA. GVL Recreation, Inc. and/or its agent has knowledge of proper equipment loading, nozzle selection, calibration, and operation so that spills are minimized, precise application rates are made according to the label, and only target plants are treated.

Element 10 Examination of Possible Alternatives

10.1 Evaluation of Other Management Options

Treatment of algae and aquatic weeds is determined by the application of Integrated pest Management (IPM). For example, if a population of algae or aquatic weeds equals or exceeds a

threshold, an algaecide or aquatic herbicide application is made. Thresholds are met when aquatic weeds or algae cause problems, typically associated with taste and odor complaints.

Algaecide and aquatic herbicide applications may also be made prior to threshold exceedance. For example, based on predicted growth rate and density, weather, water availability, and historical records and experience, aquatic weeds may reasonably be predicted to cause future problems. Accordingly, they may be treated soon after emergence. Even though algae or aquatic weeds may not be an immediate problem at this phase, treating them before they mature reduces the amount of algaecide and aquatic herbicide needed because the younger aquatic weeds are more susceptible and there is less plant mass to target. Selection of appropriate algaecides and aquatic herbicides and rate of application is done base on the identification of the algae or aquatic weed and the appearance of that algae or aquatic weed on the product label.

10.1.1 No Action

As feasible, this technique is used. Prior to reaching a threshold, no control is considered.

10.1.2 Prevention

Habitat Modification

After the removal of non-native nuisance or invasive species, the introduction and re-establishment of native species may be successful. This technique is intended to provide competition for non-desirable species and reduce the need for aquatic weed abatement only around the perimeter. This approach would not directly affect algae populations.

GVL Recreation, Inc. may also consider other habitat modifying techniques appropriate for the individual target areas: for example, dredging, oxygenation or aeration, shading with dyes, and bio-manipulation. In areas where sedimentation has significantly impacted the capacity of the water body, dredging can increase the water volume; reduce organic matter generated in the water body, and remove nutrient-containing sediment. Aeration, oxygenation and mixing are methods that can mechanically add oxygen directly to the water, and can result in the reduction of nuisance algae growth.

Shading the water column using non-toxic, inert dyes can reduce unwanted submerged plants and algae. Use of dyes works on algae and submerged vegetation by limiting their ability to photosynthesize when the dye is present but is not a long-term solution and is generally not applicable for drinking water sources.

Bio-manipulation utilizes various natural mechanisms that can reduce suspended algae, and involves increasing biological controls in the habitat. The biological controls are typically done by top-down or bottom-up changes to the food-web structure aimed at increasing populations of algae-consuming zooplankton. Bio-manipulation may be more efficient when used in conjunction of other habitat modification methods.

Native Species Establishment

No appropriate submersed aquatic native plants have been found to establish with the lake to out compete aquatic weed species present and not create similar or other operational problems. As such, aquatic vegetation in the lake must be controlled to maintain the aquatic weed density tolerances established by GVL Recreation, Inc. and/or it's agent.

10.1.3 Mechanical or Physical Methods

Mechanical Removal

Mechanical removal in the lake would require various methods including hand cutting from shore or while wading, hand-pulling aquatic weeds, use of motor-driven aquatic weed harvesters to cut and harvest vegetation, aquatic weed-whacking, or mowing.

Generally, these techniques are very labor intensive per unit acre of water treated. Mechanical removal places personnel at risk of general water, boating, slip, trip and fall hazards, drowning, risks of spilling of motor oil and fuel, and can increase air pollution. The cost per area of mechanical removal is significantly higher than the cost of labor, product and equipment of the application of aquatic herbicides.

In some instances, the use of mechanical techniques may be necessary when the use of algaecides or aquatic herbicides is not practical, or vegetation is not at an appropriate growth state. In general, mechanical removal and disposal of cut vegetation is significantly higher than chemical control of the same area desired for control.

10.1.4 Cultural Methods

Cultural methods used to reduce the amount of aquatic herbicides used include modifying the timing of algaecide and aquatic herbicide and non-herbicide controls. GVL Recreation, Inc. and/or it's agent may make algaecide and aquatic herbicide applications before the density of algae or aquatic vegetation is high enough to require higher algaecide or aquatic herbicide application rates or additional applications to maintain algae or aquatic weed populations below threshold levels.

10.1.5 Biological Control Agents

This option is not a suitable alternative control in Green Valley Lake

10.1.6 Algaecides and Aquatic Herbicides

The selection of and decision to use an algaecide or aquatic herbicide is based on the recommendation of a PCA in collaboration with the Water District staff. The PCA then considers a variety of control options that may include mechanical and cultural techniques that alone or in combination with chemical controls are the most efficacious and protective of the environment. The quantity of algaecide and aquatic herbicide required for an application is determined by a PCA that has followed the label directions in making a recommendation. The

rate at which an algaecide and aquatic herbicide is used is highly variable and depends on the type, time of year, location, and density and type of aquatic weeds, water presence, and goal of the application. All these factors are considered by the PCA prior to making a recommendation for an application.

GVL Recreation, Inc. and/or its agent may use a variety of application vehicles or vessels including boats to apply algaecides and herbicides. Application techniques may include injection, granular spreaders or liquid sprays. Combined with the need to hold, safely transport and properly apply algaecides and aquatic herbicides, GVL Recreation, Inc. and/or its agent techniques are the least intrusive as possible.