

April 18, 2007

Joe Karkoski, Senior Land and Water Use Analyst
Regional Water Quality Control Board,
Central Valley Region
11020 Sun Center Drive, #200
Rancho Cordova, CA 95670-6114

Dear Mr. Karkoski,

Thank you for the opportunity to review and comment on the Basin Plan Amendments to the Water Quality Control Plan for the Sacramento River and San Joaquin River Basins for the Control of Diazinon and Chlorpyrifos Runoff into the Sacramento and Feather Rivers Report dated March 2007. We have reviewed the proposed actions in the report and conclude they are consistent with applicable federal regulations concerning TMDLs.

We support and pleased to see that this report builds upon the technical and policy foundation of the State Board adopted and USEPA approved San Joaquin River diazinon and chlorpyrifos TMDL, and the Regional Board adopted Delta diazinon and chlorpyrifos TMDL. In particular, we support the application of the Board's additivity formula, and the diazinon and chlorpyrifos water quality objectives, which are based on USEPA water quality criteria guidelines. We support the calculation of toxic equivalents according to the Board's Basin Plan's method for considering additive toxicity as this approach applies to both acute and chronic endpoints. In addition, this approach is easily applicable to additional chemicals besides the two pesticides currently being addressed in this action. It is also appropriate to have included chlorpyrifos, as diazinon and chlorpyrifos co-occur in this watershed and this is consistent with the San Joaquin River in Delta TMDLs. The consideration of chemical mixtures is important, because regulatory TMDLs are typically developed for a single chemical in a waterbody, although it is likely that a mixture of chemicals exist in the waterbody (Lydy et al., 2004).

We appreciate your hard work and efforts on this TMDL. Any questions or further discussions, please call me at 916-341-5520 or denton.debra@epa.gov.

Sincerely,

Debra L Denton, PhD
Environmental Scientist

cc Peter Kozelka, USEPA Region 9

Lydy MJ, Belden JB, Wheelock CE, Hammock BD, Denton, DL. 2004. Challenges in regulating pesticide mixtures. *Ecology and Society*. 9(6):1.