
Central Valley Regional Water Quality Control Board

14 December 2017

Mr. Joseph C. McGahan
Drainage Coordinator
Grassland Bypass Project
Post Office Box 2157
Los Banos, CA 93635

APPROVAL OF THE GRASSLAND BYPASS PROJECT PESTICIDE MONITORING PLAN

Thank you for your submittal of the Pesticide Monitoring Plan for the Grassland Drainage Area. The proposed pesticides and schedule for monitoring were identified based on guidance provided in the Pesticide Evaluation Protocol (PEP), issued on 29 November 2016, as required by sections II.C. and III.F. of the Monitoring and Reporting Program (MRP) Attachment B to Order R5-2015-0094 Waste Discharge Requirements for San Luis & Delta-Mendota Water Authority and United States Department of the Interior Bureau of Reclamation Surface Water Discharges from the Grassland Bypass Project (Order). Staff reviewed the Plan for completeness and consistency with the PEP.

Staff determined that the Pesticide Monitoring Plan complies with the MRP requirements. Pesticides were identified using the approved PEP and the proposed monitoring schedule is consistent with the requirements of the Order. Note that trigger limits for previously untested pesticides will be developed by the Central Valley Water Board staff through a process involving coordination with the Department of Pesticide Regulation and stakeholder input.

Based on the attached staff memorandum, I approve the Pesticide Monitoring Plan for pesticide monitoring to be completed from 1 January through 31 December 2018. If you have any questions or comments regarding this approval letter, please contact Ashley Peters by phone at (916) 464-4857 or by email at Ashley.Peters@waterboards.ca.gov.

Sincerely,
Original signed by Adam Laputz for

Pamela C. Creedon
Executive Officer

Enclosure: Staff Review of Pesticide Monitoring Plan

Central Valley Regional Water Quality Control Board

TO: Susan Fregien
Senior Environmental Scientist
IRRIGATED LANDS REGULATORY PROGRAM

FROM: Ashley Peters, P.E.
Water Resource Control Engineer
IRRIGATED LANDS REGULATORY PROGRAM

DATE: 30 November 2017

SUBJECT: REVIEW OF THE GRASSLAND BYPASS PROJECT PESTICIDE MONITORING PLAN

The Central Valley Water Board received a revised Pesticide Monitoring Plan (Plan) for the Grassland Bypass Project on 28 November 2017. The revised Plan was submitted in response to staff comments provided on the 26 September 2017 submittal. The Plan identifies the constituents and schedule for pesticide monitoring in surface water within the Grassland Drainage Area (GDA) for 1 January through 31 December 2018.

Staff reviewed the Plan to determine compliance with requirements pursuant to sections II.C. and III.F. of the Monitoring and Reporting Program (MRP) Attachment B to Order R5-2015-0094 Waste Discharge Requirements for San Luis & Delta-Mendota Water Authority and United States Department of the Interior Bureau of Reclamation Surface Water Discharges from the Grassland Bypass Project (Order), as well as the Pesticide Evaluation Protocol, issued by the Executive Officer on 29 November 2016. Overall, the Plan meets the requirements of the Order, and staff recommends approval of the Plan for pesticide monitoring in 2018. A summary of the pesticide monitoring constituents and schedule is provided below.

Monitoring Sites, Parameters, and Schedule

Pesticide monitoring is required by the MRP at sites B3, Gun Club Road within the San Luis Drain; D, downstream of San Luis Drain within Mud Slough (north); and R, China Island Unit within the San Joaquin River. Of the 376 pesticides on the Executive Officer list provided with the Pesticide Evaluation Protocol, 23 were identified for monitoring within the GDA. The constituents and schedule for monitoring is presented in Table 1.

The constituents selected for monitoring were determined using the last three years of Pesticide Use Report (PUR) data for the GDA. Pesticides that were not applied within the GDA were removed from consideration. Degradates were then added to the list of pesticides under consideration and pesticides with the same toxicant in water were grouped for evaluation of the human health and aquatic life risk ratios.

Pesticides applied within the GDA were excluded from monitoring based on factors including environmental fate and transport properties such as high volatility, calculation of a human health risk ratio of less than 10, calculation of an aquatic life risk ratio of less than 50, monthly applications of less than 10% of the annual use, and no commercially available analytical

methods. In addition, the Grassland Basin Drainers noted that waterbodies within the GDA do not have a Municipal and Domestic (MUN) beneficial use designation and, therefore, human health criteria are not applicable. The human health risk ranking was determined for pesticides used within the GDA and provided with the Plan, but no pesticides were selected for monitoring based on the human health ranking and other exclusion criteria.

Staff has confirmed that the MUN beneficial use designation does not apply at site B3, which is within the San Luis Drain, and site D, which is within Mud Slough (north) and does not have MUN designated by the Basin Plan. The MUN beneficial use does apply to site R, which is within the San Joaquin River.

STAFF RECOMMENDATIONS

The Plan successfully executed the steps outlined in the Pesticide Evaluation Protocol and complies with the requirements of the Order and MRP. Staff recommends approval of the Plan for the Grassland Bypass Project for pesticide monitoring to be conducted from 1 January through 31 December 2018.

TABLE 1: MONITORING SCHEDULE

Month	BIFENTHRIN	CARBARYL	CHLOROTHALONIL	CHLORPYRIFOS	Clothianidin	COPPER	CYFLUTHRIN	CYPERMETHRIN	DIMETHOATE	ENDOSULFAN	ESFENVALERATE	FENPROPATHRIN	FLUMIOXAZIN	IMIDACLOPRID	LAMBDA-CYHALOTHRIN	LINURON	MALATHION	METHOMYL	OXYFLUORFEN	PARAQUAT DICHLORIDE	PENDIMETHALIN	PERMETHRIN	TRIFLURALIN	Grand Total
Jan				X		X							X						X		X			5
Feb			X				X		X						X	X	X				X			7
Mar		X	X	X			X		X					X	X		X					X	X	10
Apr	X	X									X			X	X			X					X	7
May						X			X					X	X			X				X	X	7
Jun		X		X	X	X		X			X			X				X		X		X		10
Jul	X		X				X	X			X									X		X		7
Aug	X		X	X				X		X		X						X		X		X		9
Sep				X								X						X		X				4
Oct													X				X	X		X	X			5
Nov													X						X		X			3
Dec																			X				X	2
Grand Total	3	3	4	5	1	3	3	3	3	1	3	2	3	4	4	1	3	6	3	5	4	5	4	76