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## Central Valley Regional Water Quality Control Board

26 October 2018

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

### ***APPROVAL OF THE GRASSLAND BYPASS PROJECT PESTICIDE MONITORING PLAN – 2019 UPDATE***

Thank you for your submittal of the 2019 update to 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 (Order). Staff determined that the Plan complies with the MRP requirements for the scheduled monitoring locations.

Based on the attached staff memorandum, I approve the Pesticide Monitoring Plan for pesticide monitoring to be completed from 1 January through 31 December 2019. 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](mailto:Ashley.Peters@waterboards.ca.gov).

*Original signed by Adam Laputz for*

Patrick Pulupa  
Executive Officer

Enclosure: Staff Review of Pesticide Monitoring Plan

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## 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: 19 October 2018

SUBJECT: REVIEW OF THE GRASSLAND BYPASS PROJECT PESTICIDE MONITORING  
PLAN – 2019 Update

The Central Valley Water Board received a revised Pesticide Monitoring Plan (Plan) for the Grassland Bypass Project on 19 October 2018. The revised Plan was submitted in response to staff comments provided on the 12 October 2018 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 2019.

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 2019. 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, 27 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. However, the MUN beneficial use designation 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 2019.

TABLE 1: MONITORING SCHEDULE

Constituents	JANUARY	FEBRUARY	MARCH	APRIL	MAY	JUNE	JULY	AUGUST	SEPTEMBER	OCTOBER	NOVEMBER	DECEMBER	Grand Total
2,4-D acids & salts										X			1
2,4-DB		X								X	X	X	4
BIFENTHRIN				X		X	X	X	X				5
CARBARYL			X	X	X	X							4
CHLOROTHALONIL							X	X	X				3
CHLORPYRIFOS						X	X	X					3
COPPER	X		X		X	X	X						5
CYFLUTHRIN						X	X	X	X				4
CYPERMETHRIN						X	X	X					3
DIAZINON				X	X								2
DIMETHOATE		X	X		X	X							4
DIURON	X	X							X	X		X	5
ESFENVALERATE	X			X	X	X	X						5
FENPROPATHRIN								X	X				2
GLYPHOSATE	X	X	X	X	X	X	X	X	X	X	X	X	12
HEXAZINONE												X	1
IMIDACLOPRID				X	X	X							3
LAMBDA-CYHALOTHRIN				X	X	X	X						4
LINURON		X											1
MALATHION		X	X	X	X			X					5
METHOMYL					X	X		X					3
OXYFLUORFEN	X	X									X	X	4
PARAQUAT DICHLORIDE										X			1
PENDIMETHALIN	X	X									X	X	4
PERMETHRIN				X	X	X	X						4
PROMETRYN										X			1
TRIFLURALIN		X	X	X	X								4
<b>Grand Total</b>	<b>6</b>	<b>9</b>	<b>6</b>	<b>10</b>	<b>12</b>	<b>13</b>	<b>10</b>	<b>9</b>	<b>6</b>	<b>6</b>	<b>4</b>	<b>6</b>	<b>97</b>