

Central Valley Regional Water Quality Control Board

9 January 2024

David Halopoff
Cawelo Water District Coalition
17207 Industrial Farm Road
Bakersfield, CA 93308

CONDITIONAL APPROVAL OF THE CAWELO WATER DISTRICT COALITION SURFACE WATER PESTICIDE EVALUATION PROTOCOL PROPOSAL

Thank you for your submittal of the Pesticide Evaluation Protocol Proposal – 2024 Update (Proposal) for the Cawelo Water District Coalition. The proposed pesticides and schedule for surface water monitoring were identified based on guidance provided in the Pesticide Evaluation Protocol (PEP) as required by section III.B.2. of the Monitoring and Reporting Program (MRP) Attachment B to Order R5-2013-0120-09 (Order).

Based on the attached staff memorandum, the monitoring schedule complies with the MRP requirements, except for acetamiprid and chloropicrin monitoring. I am approving the Proposal under the condition that the monitoring schedule is revised to include these two pesticides.

If you have any questions regarding this approval letter, please contact Yared Kebede by email at Yared.Kebede@waterboards.ca.gov.

Sincerely,

Adam Laputz
Patrick Pulupa
Executive Officer

Digitally signed by Adam Laputz
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Enclosure: Staff Review of Pesticide Monitoring Proposal.

Central Valley Regional Water Quality Control Board

TO: Petra Lee
Senior Environmental Scientist
Irrigated Lands Regulatory Program

FROM: Yared Kebede
Environmental Scientist
Irrigated Lands Regulatory Program

DATE: 21 December 2023

SUBJECT: REVIEW OF THE CAWELO WATER DISTRICT COALITION PESTICIDE EVALUATION PROTOCOL PROPOSAL – 2024 UPDATE

The Central Valley Water Board received the Cawelo Water District Coalition (Coalition) revised Pesticide Evaluation Protocol Proposal (Proposal) on 10 November 2023. The proposal identifies the constituents and schedule for pesticide monitoring in surface water from 1 January 2024 through 31 December 2024.

Staff reviewed the Proposal to determine compliance with the requirements pursuant to section III. B.2. of the Monitoring and Reporting Program (MRP) Attachment B to Order R5-2013-0120-09 (Order). A summary of the main elements of the proposed monitoring proposal is provided below, followed by staff recommendation.

1. Monitoring Sites, Parameters, and Schedule

Pesticide monitoring is scheduled at Poso Creek @ Hwy 65, Poso Creek @ Hwy 99, and Poso Creek @ Zerker Rd. The constituents selected for monitoring were determined using three years of Pesticide Use Report data (2019-2021) for the Poso Creek sub-watershed, as required by the Pesticide Evaluation Protocol. Pesticides that were not applied within this sub-watershed 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 aquatic life risk ratios.

Pesticides applied within the sub-watershed were excluded from monitoring based on factors including environmental fate and transport properties such as high volatility, calculation of an aquatic life risk ratio of less than 50, and no commercially available analytical methods. The human health risk ratios were not determined because the Cawelo Water District Coalition monitoring locations are not designated as having Municipal and Domestic Supply beneficial use in the Water Quality Control Plan for the Tulare Lake Basin.

2. Staff Comments

The Coalition proposed to exclude certain pesticides from monitoring if “only one Environmental Laboratory Accreditation Program (ELAP) accredited laboratory offers the analysis, regardless of the number of non-accredited laboratories offering the analysis”. This led to the proposed exclusion of pesticides from monitoring because the PEP requires availability of commercial analytical methods that can be performed by multiple laboratories. Neither the Order nor the PEP stipulate that pesticide analyses must be conducted using an ELAP accredited method. Therefore, the Proposal should be revised to include monitoring for acetamiprid and chloropicrin.

3. Staff Recommendation

The Proposal successfully executed the steps outlined in the Pesticides Evaluation Protocol and complies with the requirements of the MRP. Staff recommends approval of the Proposal for pesticide monitoring from 1 January 2024 through 31 December 2024 with the condition that monitoring for acetamiprid and chloropicrin monitoring are scheduled. There are commercially available analytical methods for these pesticides, and ELAP accreditation is unnecessary.