

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
CENTRAL VALLEY REGION**

ORDER R5-XXXX-XXXX  
**ATTACHMENT B TO ORDER R5-XXXX-XXXX  
MONITORING AND REPORTING PROGRAM**

WASTE DISCHARGE REQUIREMENTS GENERAL ORDER  
FOR  
GROWERS WITHIN THE SAN JOAQUIN COUNTY AND DELTA AREA WATERSHED  
THAT ARE MEMBERS OF THE THIRD-PARTY GROUP

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Appendix MRP-1: Third-Party Management Plan Requirements  
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## I. Introduction

This Monitoring and Reporting Program (MRP) is issued pursuant to California Water Code (Water Code) section 13267 which authorizes the California Regional Water Quality Control Board, Central Valley Region (hereafter Central Valley Water Board or “board”), to require preparation and submittal of technical and monitoring reports. This MRP includes requirements for a third-party representative entity assisting individual irrigated lands operators or owners that are members of the third-party (Members), as well as requirements for individual Members subject to and enrolled under Waste Discharge Requirements General Order for Growers within the San Joaquin County and Delta Area that are Members of the Third-Party Group, Order R5-2012-0116 (hereafter referred to as the “Order”). The requirements of this MRP are necessary to monitor Member compliance with the provisions of the Order and determine whether state waters receiving discharges from Members are meeting water quality objectives. Additional discussion and rationale for this MRP’s requirements are provided in Attachment A of the Order.

This MRP establishes specific surface and ground water monitoring, reporting, and electronic data deliverable requirements for the third-party. Due to the nature of irrigated agricultural operations, monitoring requirements for surface waters and groundwater will be periodically reassessed to determine if changes should be made to better represent irrigated agriculture discharges to state waters. The monitoring schedule will also be reassessed so that constituents are monitored during application and/or release timeframes when constituents of concern are most likely to affect water quality. The third-party shall not implement any changes to this MRP unless the Central Valley Water Board or the Executive Officer issues a revised MRP.

## II. General Provisions

This Monitoring and Reporting Program (MRP) conforms to the goals of the Non-point Source (NPS) Program as outlined in *The Plan for California’s Nonpoint Source Pollution (NSP) Program* by:

- tracking, monitoring, assessing and reporting program activities,
- ensuring consistent and accurate reporting of monitoring activities,
- targeting NPS Program activities at the watershed level,
- coordinating with public and private partners, and
- tracking implementation of management practices to improve water quality and protect existing beneficial uses.

Monitoring data collected to meet the requirements of the Order must be collected and analyzed in a manner that assures the quality of the data. The third-party must follow sampling and analytical procedures as specified in Attachment C, Order No. R5-2008-0005, Coalition Group Monitoring Program Quality Assurance Project Plan Guidelines (QAPP Guidelines) and any revisions thereto approved by the Executive Officer.<sup>1</sup>

To the extent feasible, all technical reports required by this MRP must be submitted electronically in a format specified by the Central Valley Water Board that is reasonably available to the third-party.

This MRP requires the third-party to collect information from its Members and allows the third-party to report the information to the board in a summary format. The third-party must submit specific Member information collected as part of the Order and this MRP when requested by the Executive Officer or as specified in the Order.

This MRP Order becomes effective on **dd mm 20XX**. The Central Valley Water Board Executive Officer may revise this MRP as necessary. Upon the Executive Officer issuing the Notice of

<sup>1</sup> Central Valley Water Board staff will circulate proposed revisions of the QAPP Guidelines for public review and comment prior to Executive Officer consideration for approval.

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Applicability to the third-party, the third-party, on behalf of the individual Members, shall implement the following monitoring and reporting.

### III. Surface Water Quality Monitoring Requirements

#### A. Surface Water Monitoring Sites

There are three different types of monitoring sites described below: 1) Core sites; 2) Represented sites; and 3) Special Project sites. Core sites are monitored comprehensively on a recurring basis to track trends in surface water quality and to identify water quality problems. Represented sites generally have characteristics similar to, and are, therefore, represented by the Core sites within their common zone.<sup>2</sup> When a water quality problem is identified at a Core site, the Represented sites are evaluated and potentially monitored to determine whether the water quality problem is also occurring at the Represented site (some represented water bodies may not have a monitoring site, e.g. in cases when there is no access). Special Project sites are identified and monitored to investigate identified water quality problems. A Core site or Represented site may also be a Special Project site.

#### 1. Core Site Monitoring

At a minimum, surface water monitoring (as described in section III.C.1.a) within each zone shall be conducted at one of the designated Core sites (see Table 1) for two consecutive years, followed by two years of monitoring at the second Core monitoring site for those zones in which two Core sites are present. If two Core monitoring sites are established, core site monitoring shall alternate continuously between the two Core sites. If the Executive Officer has approved a single Core site within a zone, monitoring is to occur for a minimum of two consecutive years followed by two years of no Core Site monitoring (per Section III.C.1.a). The Executive Officer may determine that additional monitoring must continue per Section III.C.1.b. during the years of no regularly scheduled Core Site monitoring. When a water quality objective or trigger limit at a monitored Core site is exceeded, the parameter associated with the exceedance must be monitored for a third consecutive year. If two exceedances have occurred within the two years the Core site is being monitored, a third year of monitoring is not required. However, the parameter will be monitored in accordance with the Management Plan for that parameter and site.

#### 2. Represented Site Monitoring

When a water quality objective or trigger limit is exceeded at a Core site, the third-party must evaluate the potential for similar risks or threats to water quality associated with that parameter at the sites represented by the Core site (Represented sites). The evaluation must be included in the Monitoring Report (see section V below). If pesticide use information or other factors indicate a risk, the third party must either 1) perform monitoring for that parameter in the appropriate Represented water bodies, or 2) where site access is not available, implement the applicable surface water quality management plan actions associated with the Core site. . The proposed monitoring plan must be included in the Monitoring Plan Update (see section III.C below). Any such monitoring must occur for a minimum of two years during the time period of highest risk of exceedance of water quality objectives for that parameter. When a water quality objective at a monitored Represented site is exceeded, the parameter associated with the exceedance must be monitored for a third consecutive year. If two exceedances have occurred within the two years the Core site is being monitored, a third year of monitoring is not required. However, the parameter will be monitored in accordance with the Management Plan for that parameter and site.

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<sup>2</sup> As part of their 25 August 2008 Monitoring and Reporting Program Plan (2008 MRPP), the San Joaquin County and Delta Area Coalition (the Coalition) designated six zones within its area based on hydrology, crop types, land use, soil types, and rainfall. A seventh zone was added in 2013 as part of the Order development.

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Any watershed area that does not contain a monitoring site due to issues of access or location downstream of urban influence must be represented by the Core site(s) in that zone. Any applicable surface water quality management plan (SQMP) actions associated with the Core site must take place in these watershed areas (represented drainages without monitoring sites).

### **3. Special Project Sites**

In addition to Core and Represented sites, the third-party may designate Special Project sites as needed in a surface water quality management plan (SQMP) to evaluate commodity or management practice-specific effects on identified water quality problems,<sup>3</sup> or to evaluate sources of identified water quality problems.

The Executive Officer may require the third-party to conduct local or site-specific monitoring to address a parameter associated with a management plan or TMDL (see section III.C.5. below). Core sites and Represented sites located in areas where management plans are required will also be considered Special Project sites for the parameter(s) subject to the management plan(s).

### **B. Monitoring Locations**

The location of Core and monitored Represented sites are identified in Table 1 below. The third-party may submit written requests (including technical justification) for removal/addition of monitoring sites for approval by the Executive Officer.

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<sup>3</sup> "Water quality problem" is defined in Attachment E.

**Table 1. Third-party Core and Monitored Represented\* Sites By Zone**

Zone	Core Site (First, Second)	Represented HUC Subwatershed <sup>1</sup>	Represented Site Name	Station Code	Latitude	Longitude
1	1	Mokelumne River @ Bruella Rd, TBD		531XMRABR	38.16010	-121.20510
	1	Coyote Creek	Coyote Creek tributary @ Jack Tone Rd	531CCTALR	38.24082	-121.15191
	1	Jahant Slough	Jahant Slough @ Cherokee Ln	531XJSACL	38.21035	-121.26199
	1	Lower Bear Creek	Bear Creek @ North Alpine Rd	531BCANAR	38.07431	-121.21090
	1	Mosher Creek	Mosher Creek @ North Alpine Rd	531MCANAR	38.06088	-121.20913
	1	Murphy Creek-Mokelumne River	Mokelumne River Drain @ North Lower Sacramento Rd	531MRDNL5	38.19557	-121.29362
	1	Pixley Slough	Pixley Slough @ Fury Rd	531XPSAFR	38.08256	-121.24147
2	2	French Camp Slough @ Airport Way, TBD		531SJC504	37.88170	-121.24930
	2	Lower Duck Creek	Duck Creek @ Highway 4	531XDCAHF	37.94910	-121.18100
	2	Lower Lone Tree Creek	Unnamed Drain to Lone Tree Creek @ Jack Tone Rd	531UDLTAJ	37.85358	-121.14570
	2	McLeod Lake-Mormon Slough	Mormon Slough @ Jack Tone Rd	544MSAJTR	37.96470	-121.14880
	2	Middle Lone Tree Creek	Lone Tree Creek @ Jack Tone Rd	531XLTCLR	37.83760	-121.14380
	2	Simmons Creek-Littlejohns Creek	Littlejohns Creek @ Jack Tone Rd	531XLCAR	37.88960	-121.14610
3	3	Terminus Tract Drain @ Hwy 12, TBD		544XTTHWT	38.11660	-121.49360
	3	Fivemile Creek-San Joaquin River	TBD	TBD	TBD	TBD
	3	Hog Slough	TBD	TBD	TBD	TBD
	3	South Mokelumne River-Mokelumne River	TBD	TBD	TBD	TBD
	3	Telephone Cut-Bishop Cut	TBD	TBD	TBD	TBD
	3	Venice Island-Little Connection Slough	TBD	TBD	TBD	TBD
4	4	Roberts Island @ Whiskey Slough Pump Rd, TBD		544RIAWSP	37.96698	-121.46366
	4	Jersey Island-Taylor Slough	TBD	TBD	TBD	TBD
	4	Lower Kellogg Creek	TBD	TBD	TBD	TBD
	4	Lower Old River	TBD	TBD	TBD	TBD
	4	Mandeville Island-Connection Slough	TBD	TBD	TBD	TBD
	4	McDonald Island-Hayes Slough	TBD	TBD	TBD	TBD
	4	Middle River-San Joaquin River	TBD	TBD	TBD	TBD
5	5	Walthall Slough @ Woodward Ave, NA				
	5	Walthall Slough-San Joaquin River	Walthall Slough @ Woodward Ave	544WSAWAV	37.77046	-121.29227
6	6	Contra Costa Zone - no Core Site <sup>1</sup>		NA	NA	NA
7	7	Union Island Drain @ Bonetti Rd, TBD		544UIDABR	37.87170	-121.52551
	7	Roberts Island-Trapper Slough	TBD	TBD	TBD	TBD
	7	Town of French Camp-San Joaquin River	TBD	TBD	TBD	TBD
	7	Union Island	TBD	TBD	TBD	TBD

<sup>1</sup>The Contra Costa zone does not have a Core Site due to the large amount of urban areas within this zone. There are 428 irrigated acres out of 185,583 of total acres in the Zone. Monitoring will continue at sites in the zone that require Management Plans or require additional monitoring due to approved TMDLs.

**C. Monitoring Requirements and Schedule**

**1. Surface Water Monitoring**

- a. Surface water monitoring must provide sufficient data to describe irrigated agriculture's impacts on surface water quality and to determine whether existing or newly implemented management practices have an effect on water quality to comply with the receiving water limitations of the Order. Surface water monitoring shall include a comprehensive suite of constituents (also referred to as "parameters") monitored periodically in a manner that allows for an evaluation of the condition of a water body and determination of whether irrigated agriculture operations in the

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San Joaquin County and Delta Area are causing or contributing to any surface water quality problems.

Surface water assessment monitoring shall be conducted at Core sites and shall consist of the general water quality parameters, nutrients, pathogen indicators, water column and sediment toxicity, pesticides, and metals identified in section III.C.3.

Sampling events shall be scheduled to capture at least two storm runoff events per year, except where a different frequency has been required or approved by the Executive Officer. The third-party shall identify storm runoff monitoring criteria that are based on precipitation levels and knowledge of soils or other factors affecting when storm runoff is expected to occur at monitoring sites. The collection of storm runoff samples shall not be contingent upon the timing of other sampling events and could result in monitoring more than once a month.

- b. *Follow-up sampling:* The Central Valley Water Board Executive Officer may request that a parameter(s) of concern continue to be monitored at a specific Core or Represented site during non-scheduled years. Parameters of concern may include, but are not limited to, parameters that exceed an applicable water quality objective or water quality trigger (see section VIII).

## 2. Monitoring Schedule and Frequency

By 1 August of the calendar year in which monitoring begins, the third-party shall prepare a Monitoring Plan Update. The Monitoring Plan Update shall identify the appropriate monitoring periods (e.g., months, seasons) and frequency for all parameters that require testing (Table 2) at each site that is scheduled to be monitored (see section III.C.3 below)<sup>4</sup>. The Monitoring Plan Update shall include a discussion of the rationale to support the proposed schedule, and shall be subject to Executive Officer review and approval prior to the initiation of changes in monitoring activities. The third-party shall continue monitoring as described in the Coalition's 25 August 2008 Monitoring and Reporting Program Order (2008 MRP) until the Executive Officer has approved the initial Monitoring Plan Update

For metals, pesticides, and aquatic toxicity, the monitoring periods shall be determined utilizing previous monitoring results, knowledge of agricultural use patterns (if applicable), pesticide use trends, chemical characteristics, and other applicable criteria. All other required parameters shall be monitored according to an approved schedule and frequency during the years in which monitoring is conducted at the Core and Represented sites.

Monitoring must be conducted when the pollutant is most likely to be present. If there is a temporal or seasonal component to the beneficial use, monitoring must also be conducted when beneficial use impacts could occur. The frequency of data collection must be sufficient to allow determination of compliance with the relevant numeric water quality objective(s) or water quality triggers. The third-party may submit written requests for the removal or addition of monitoring sites or parameters, or to modify the monitoring schedule and frequency, for approval by the Executive Officer.

## 3. Monitoring Parameters

Water quality and flow monitoring shall be used to assess the wastes in discharges from irrigated lands to surface waters and to evaluate the effectiveness of management practice implementation. Water quality is evaluated with both field-measured parameters and laboratory analytical data as listed on Table 2 of this MRP. The pesticides identified as "to be determined" (TBD) on Table 2 shall be identified as part of a process that includes input from qualified scientists and coordination with the Department of Pesticide Regulation. Based on this process, the Executive Officer will

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<sup>4</sup> A monitoring year is defined according to water year, which is 1 October through 30 September.

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provide the third-party with a list of pesticides that require monitoring in areas where they are applied and have the potential to impair water quality.

Parameters that are part of an adopted TMDL that is in effect and for which irrigated agriculture is a source within the San Joaquin County and Delta Area shall be monitored in accordance with the adopted Basin Plan provisions or as directed by the Executive Officer. Current adopted TMDLs within the San Joaquin County and Delta Area for which irrigated agriculture is a source include the San Joaquin River Deep Water Ship Channel dissolved oxygen; San Joaquin River salt, boron, selenium, and Delta diazinon, and chlorpyrifos, and Delta methyl-mercury.

The metals to be monitored at sites within each site subwatershed shall be determined through an evaluation of several factors. The evaluation will provide the basis for including or excluding each metal. Evaluation factors shall include, but not be limited to: documented use of the metal applied to lands for irrigated agricultural purposes in the last three years; prior monitoring results; geological or hydrological conditions; and mobilization or concentration by irrigated agricultural operations. The third-party may also consider other factors such as acute or chronic toxicity thresholds and chemical characteristics of the metals. The third-party shall evaluate the monitoring parameters listed in Table 2 to determine which metals warrant monitoring for each site subwatershed. Documentation of the evaluations must be provided to the Central Valley Water Board as part of the Monitoring Plan Update.

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**Table 2: Monitoring Parameters**

	Measured Parameter	Matrix	Required
Field Measurements	Estimated Flow (cfs)	Water	x
	Photo Documentation	Site	x
	Conductivity (at 25 °C) (µs/cm)	Water	x
	Temperature (°C)	Water	x
	pH	Water	x
	Dissolved Oxygen (mg/L)	Water	x
Drinking Water	<i>E. coli</i>	Water	x
	Total Organic Carbon (TOC)	Water	x
Gen Phys	Hardness (as CaCO <sub>3</sub> )	Water	TBD
	Total Suspended Solids (TSS)	Water	x
	Turbidity	Water	x
Metals	Arsenic (total)	Water	TBD
	Boron (total)	Water	TBD
	Cadmium (total and dissolved)**	Water	TBD
	Copper (total and dissolved)**	Water	TBD
	Lead (total and dissolved)**	Water	TBD
	Molybdenum (total)	Water	TBD
	Nickel (total and dissolved)**	Water	TBD
	Selenium (total)	Water	TBD

**Table 2: Monitoring Parameters**

	Measured Parameter	Matrix	Required
	Zinc (total and dissolved)**	Water	TBD
Nutrients	Total Ammonia (as N)	Water	x
	Unionized Ammonia (calc value)	Water	x
	Nitrogen, Nitrate+Nitrite	Water	x
	Soluble Orthophosphate	Water	x
Pesticides	Registered pesticides determined according to the process identified in section III.C.3.	Water	TBD
303(d)	TMDL constituents required by the Basin Plan  303(d) listed constituents to be monitored if irrigated agriculture is identified as a contributing source within the San Joaquin and Delta Area and requested by the Executive Officer.	Water or Sediment	TBD
Water Toxicity	<i>Ceriodaphnia dubia, acute</i>	Water	x
	<i>Pimephales promelas, acute</i>	Water	x
	<i>Selenastrum capricornutum, chronic</i>	Water	x
	Toxicity Identification Evaluation	Water	see section III.C.4
Sediment Toxicity	<i>Hyalella azteca, acute</i>	Sediment	x
Pesticides & Sediment Parameters	Bifenthrin	Sediment	As needed*
	Cyfluthrin	Sediment	As needed*
	Cypermethrin	Sediment	As needed*
	Deltamethrin	Sediment	As needed*
	Esfenvalerate/Fenvalerate	Sediment	As needed*
	Fenpropathrin	Sediment	As needed*
	Lambda cyhalothrin	Sediment	As needed*
	Permethrin	Sediment	As needed*
	Piperonyl butoxide (PBO)	Sediment	As needed*
	Chlorpyrifos	Sediment	As needed*
	Total Organic Carbon	Sediment	x
	Grain Size	Sediment	x

\* For sediment samples measuring significant toxicity and < 80% organism survival compared to the control, the sediment pesticide analysis will be performed. Sediment pesticide analyses may be identified according to an evaluation of PUR data (see sediment toxicity testing requirements in section III.C.4 below).

\*\* Hardness samples shall be collected when sampling for these metals.

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#### 4. Toxicity Testing

The purpose of toxicity testing is to: 1) evaluate compliance with the Basin Plan narrative toxicity water quality objective; 2) identify the causes of toxicity when and where it is observed (e.g. metals, pesticides, ammonia, etc.); and 3) evaluate any additive toxicity or synergistic effects due to the presence of multiple constituents.

##### a. Aquatic Toxicity

Aquatic toxicity testing shall include *Ceriodaphnia dubia*, *Pimephales promelas*, and *Selenastrum capricornutum* in the water column. Testing for *C. dubia* and *P. promelas* shall follow the USEPA acute toxicity testing methods.<sup>5</sup> Testing for *S. capricornutum* shall follow the USEPA short-term chronic toxicity testing methods.<sup>6</sup> Toxicity test endpoints are survival for *C. dubia* and *P. promelas*, and growth for *S. capricornutum*.

Water column toxicity analyses shall be conducted on 100% (undiluted) sample for the initial screening. A sufficient sample volume shall be collected in order to allow the laboratory to conduct a Phase I Toxicity Identification Evaluation (TIE) on the same sample, should toxicity be detected, in an effort to identify the cause of the toxicity.

If a 50% or greater difference in *Ceriodaphnia dubia* or *Pimephales promelas* mortality in an ambient sample, as compared to the laboratory control, is detected at any time in an acceptable test, a TIE shall be initiated within 48 hours of such detection. If a 50% or greater reduction in *Selenastrum capricornutum* growth in an ambient sample, as compared to the laboratory control, is detected at the end of an acceptable test, a TIE shall be initiated within 48 hours of such detection.

At a minimum, Phase I TIE<sup>7</sup> manipulations shall be conducted to determine the general class(es) (e.g., metals, non-polar organics, and polar organics) of the chemical(s) causing toxicity. The laboratory report of TIE results submitted to the Central Valley Water Board must include a detailed description of the specific TIE manipulations that were utilized.

If within the first 96 hours of the initial toxicity screening, the mortality reaches 100%, a multiple dilution test shall be initiated. The dilution series must be initiated within 24 hours of the sample reaching 100% mortality, and must include a minimum of five (5) sample dilutions in order to quantify the magnitude of the toxic response. For the fathead minnow test, the laboratory must take the steps to procure test species within one working day, and the multiple dilution tests must be initiated the day fish are available.

##### *Ceriodaphnia dubia* and *Pimephales promelas* Media Renewal

Daily sample water renewals shall occur during all acute toxicity tests to minimize the effects of rapid pesticide losses from test waters. A feeding regime of 2 hours prior to test initiation and 2 hours prior to test renewal shall be applied. Test solution renewal must be 100% renewal for *Ceriodaphnia dubia* by transferring organisms by pipet into fresh solutions, as defined in the freshwater toxicity testing manual.

<sup>5</sup> USEPA. 2002. Methods for Measuring the Acute Toxicity of Effluents and Receiving Waters to Freshwater and Marine Organisms, Fifth Edition. Office of Water, Washington, D.C. USEPA-821-R-02-012.

<sup>6</sup> USEPA. 2002. Short-term Methods for Estimating the Chronic Toxicity of Effluents and Receiving Waters to Freshwater Organisms, Fourth Edition. Office of Water, Washington, D.C. USEPA-821-R-02-013.

<sup>7</sup> USEPA. 1991. Methods for Aquatic Toxicity Identification Evaluations. Phase I Toxicity Characterization Procedures. Office of Research and Development, Washington DC. 20460. EPA-600-6-91-003.

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*Selenastrum capricornutum* Pre-Test Treatment

Algae toxicity testing shall not be preceded with treatment of the chelating agent EDTA. The purpose of omitting this agent is to ensure that metals used to control algae in the field are not removed from sample aliquots prior to analysis or during the initial screening.

**b. Sediment Toxicity**

Sediment toxicity analyses shall be conducted according to EPA Method 600/R-99/064. Sampling and analysis for sediment toxicity testing utilizing *Hyalella azteca* shall be conducted at each monitoring location established by the third-party for water quality monitoring, if appropriate sediment (i.e. silt, clay) is present at the site. If appropriate sediment is not present at the designated water quality monitoring site, an alternative site with appropriate sediment shall be designated for all sediment collection and toxicity testing events. Sediment samples shall be collected and analyzed for toxicity twice per year, with one sample collected between 15 August and 15 October, and one sample collected between 1 March and 30 April, during each year of monitoring. The *H. azteca* sediment toxicity test endpoint is survival. The Executive Officer may request different sediment sample collection timing and frequency under a SQMP.

All sediment samples must be analyzed for total organic carbon (TOC) and grain size. Analysis for TOC is necessary to evaluate the expected magnitude of toxicity to the test species. Note that sediment collected for grain size analysis shall not be frozen. If the sample is not toxic to the test species, the additional sample volume can be discarded.

Sediment samples that show significant toxicity to *Hyalella azteca* at the end of an acceptable test and that exhibit < 80% organism survival compared to the control will require pesticide analysis of the same sample in an effort to determine the potential cause of toxicity. The third-party may use the previous three years of available PUR data to determine which of the parameters listed in Table 2 require testing in the sediment sample. Analysis at practical reporting limits of 1 ng/g on a dry weight basis for each pesticide is required to allow comparison to established lethal concentrations of these chemicals to the test species. This follow-up analysis must begin within five business days of when the toxicity criterion described above is exceeded. The third-party may also follow up with a sediment TIE when there is ≥ 50% reduction in test organism survival as compared to the laboratory control. Sediment TIEs are an optional tool.

**5. Special Project Monitoring**

The Central Valley Water Board or Executive Officer may require the third-party to conduct local or site-specific monitoring where monitoring identifies a water quality problem (Special Project Monitoring). The studies shall be representative of the effects of changes in management practices for the parameters of concern. Once Special Project Monitoring is required, the third-party must submit a Special Project Monitoring proposal. The proposal must provide the justification for the proposed study design, specifically identifying how the study design will quantify irrigated agriculture's contribution to the water quality problem, identify sources, and evaluate management practice effectiveness. When such a study is required, the proposed study must include an evaluation of the feasibility of conducting commodity and management practice specific field studies for those commodities and irrigated agricultural practices that could be associated with the pollutants of concern. Special Project Monitoring studies will be designed to evaluate the effectiveness of practices used by multiple Members and will not be required of the third-party to evaluate compliance of an individual Member.

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#### **D. Surface Water Data Management Requirements**

All surface water field and laboratory data must be uploaded into the Central Valley Regional Data Center (CV RDC) database and will be exported to the California Environmental Data Exchange Network (CEDEN) once data have been approved as CEDEN comparable. The third-party will input its data into a replica of the CV RDC database following CV RDC and CEDEN business and formatting rules.

The third-party shall utilize the most current version of the database and update associated lookup lists on a routine basis. The third-party shall ensure that the data loaded meet the formatting and business rules as detailed in the most current version of the document "Format and Business Rules for the CV RDC CEDEN Comparable Database."

The Central Valley Water Board has developed several tools to assist the third-party with processing and loading of its data. These tools, whether required or optional, will help the third-party to efficiently conduct data processing and loading and meet data management requirements.

##### CEDEN Comparable Field Sheets (Required)

The third party shall use CEDEN comparable field sheets when entering data. An example CEDEN comparable field sheet can be found on the CV RDC webpage. This field sheet was designed to match the entry user interface within the CEDEN comparable database to allow for easier data entry of all sample collection information. Modified versions of the field sheet may be submitted to the Central Valley Water Board Executive Officer for approval.

##### Format Quick Guide (Optional Tool)

The Format Quick Guide is a guidance document for the formatting of data tailored specifically for the third-party. It contains a column by column guide for filling out the CV RDC data templates with the applicable required codes. The Central Valley Water Board CV RDC will provide this document, and updates to it, upon request based on an approved monitoring plan and associated QAPP.

##### EDD Checklist (Optional Tool)

The electronic data deliverable (EDD) checklist provides for a structured method for reviewing data deliverables from data entry staff or laboratories prior to loading. An updated checklist will be made available on the CV RDC website.

##### Online Data Checker (Optional Tool)

An online data checker was developed to automate the checking of the datasets against the current format requirements and business rules associated with CEDEN comparable data. The data checker can be accessed on the CV RDC webpage. Please note that data submission will not be accepted through this tool; however, the checker can still be used to check data for errors.

##### Electronic Quality Assurance Program Plan (eQAPP) (Required)

The third-party shall use an eQAPP when collecting and analyzing monitoring data. The eQAPP is a spreadsheet document containing the quality control requirements for each analyte and method as detailed in the most current version of the third-party's approved QAPP. Each analyte, method, extraction, units, recovery limits, QA sample requirement, etc. is included in this document using the appropriate codes required for the CEDEN comparable database. The third party shall use the document to format the reported data and conduct a quality control review prior to loading. Data that do not meet the project quality assurance acceptance requirements must be flagged accordingly and must include brief notes detailing the problem within the provided comments field. Included in this file are also the most recent CEDEN comparable station name and code list as well as the applicable project CEDEN codes for retrieving data from the CEDEN website once data arrive there.

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#### IV. Groundwater Quality Monitoring and Management Practice Assessment, and Evaluation Requirements

The groundwater quality monitoring, assessment, and evaluation requirements in this MRP have been developed in consideration of the critical questions developed by the Groundwater Monitoring Advisory Workgroup (questions are presented in the Information Sheet, Attachment A). The third-party must collect sufficient data to describe irrigated agricultural impacts on groundwater quality and to determine whether existing or newly implemented management practices comply with the groundwater receiving water limitations of the Order.

The strategy for evaluating groundwater quality and protection consists of 1) Groundwater Assessment Report, 2) Management Practices Evaluation Program, and 3) Groundwater Quality Trend Monitoring Program.

1. The Groundwater Quality Assessment Report (GAR) provides the foundational information necessary for design of the Management Practices Evaluation Program and the Groundwater Quality Trend Monitoring Program. The GAR also identifies the high vulnerability groundwater areas where a Groundwater Quality Management Plan must be developed and implemented.
2. The overall goal of the Management Practice Evaluation Program (MPEP) is to determine the effects, if any, irrigated agricultural practices have on groundwater under different conditions that could affect the discharge of waste from irrigated lands to groundwater (e.g., soil type, depth to groundwater, irrigation practice, crop type, nutrient management practice).
3. The overall objectives of the Groundwater Quality Trend Monitoring Program are to determine current water quality conditions of groundwater relevant to irrigated agriculture and develop long-term groundwater quality information that can be used to evaluate the regional effects of irrigated agricultural practices.

Each of these elements has its own specific objectives (provided below), and the design of each will differ in accordance with the specific objectives to be reached. While it is anticipated that these programs will provide sufficient groundwater quality and management practice effectiveness data to evaluate whether management practices of irrigated agriculture are protective of groundwater quality, the Executive Officer may also, pursuant to Water Code section 13267, order Members to perform additional monitoring or evaluations, where violations of this Order are documented or the irrigated agricultural operation is found to be a significant threat to groundwater quality.

##### A. Groundwater Quality Assessment Report

The purpose of the Groundwater Quality Assessment Report (GAR) is to provide the technical basis informing the scope and level of effort for implementation of the Order's groundwater monitoring and implementation provisions. Three (3) months after receiving an NOA from the Central Valley Water Board, the third-party will provide a proposed outline of the GAR to the Executive Officer that describes data sources and references that will be considered in developing the GAR.

1. *Objectives.* The main objectives of the GAR are to:
  - Provide an assessment of all available, applicable and relevant data and information to determine the high and low vulnerability areas where discharges from irrigated lands may result in groundwater quality degradation.
  - Establish priorities for implementation of monitoring and studies within high vulnerability areas.
  - Provide a basis for establishing workplans to assess groundwater quality trends.
  - Provide a basis for establishing workplans and priorities to evaluate the effectiveness of agricultural management practices to protect groundwater quality.

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- Provide a basis for establishing groundwater quality management plans in high vulnerability areas and priorities for implementation of those plans.
2. *GAR components.* The GAR shall include, at a minimum, the following data components:
    - Detailed land use information with emphasis on land uses associated with irrigated agricultural operations. The information shall identify the largest acreage commodity types in the third-party area, including the most prevalent commodities comprising up to at least 80% of the irrigated agricultural acreage in the third-party area.
    - Information regarding depth to groundwater, provided as a contour map(s).
    - Groundwater recharge information, including identification of areas contributing recharge to urban and rural communities where groundwater serves as a significant source of supply.
    - Soil survey information, including significant areas of high salinity, alkalinity and acidity.
    - Shallow groundwater constituent concentrations (potential constituents of concern include any material applied as part of the agricultural operation, including constituents in irrigation supply water [e.g., pesticides, fertilizers, soil amendments, etc.] that could impact beneficial uses or cause degradation).
    - Information on existing groundwater data collection and analysis efforts relevant to this Order (e.g., Department of Pesticide Regulation [DPR] United States Geological Survey [USGS] State Water Board Groundwater Ambient Monitoring and Assessment [GAMA], California Department of Public Health, local groundwater management plans, etc.). This groundwater data compilation and review shall include readily accessible information relevant to the Order on existing monitoring well networks, individual well details, and monitored parameters. For existing monitoring networks (or portions thereof) and/or relevant data sets, the third-party should assess the possibility of data sharing between the data-collecting entity, the third-party, and the Central Valley Water Board.
  3. *GAR data review and analysis.* To develop the above data components, the GAR shall include review and use, where applicable, of relevant existing federal, state, county, and local databases and documents. The GAR shall include an evaluation of the above data components to:
    - Determine where known groundwater quality impacts exist for which irrigated agricultural operations are a potential contributor or where conditions make groundwater more vulnerable to impacts from irrigated agricultural activities.
    - Determine the merit and feasibility of incorporating existing groundwater data collection efforts, and their corresponding monitoring well systems for obtaining appropriate groundwater quality information to achieve the objectives of and support groundwater monitoring activities under this Order. This shall include specific findings and conclusions and provide the rationale for conclusions.
    - Prepare a ranking of high vulnerability areas to provide a basis for prioritization of workplan activities.
    - The GAR shall discuss pertinent geologic and hydrogeologic information for the third-party area(s) and utilize GIS mapping applications, graphics, and tables, as appropriate, in order to clearly convey pertinent data, support data analysis, and show results.
  4. *Groundwater vulnerability designations.* The GAR shall designate high/low vulnerability areas for groundwater in consideration of high and low vulnerability definitions provided in Attachment E of the Order. Vulnerability designations may be refined/ updated periodically during the Monitoring Report process. The third-party must review and confirm or modify vulnerability designations every five (5) years after Executive Officer approval of the GAR. The vulnerability designations will be made by the third-party using a combination of physical properties (soil type, depth to groundwater, known agricultural impacts to beneficial uses, etc.) and

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management practices (irrigation method, crop type, nitrogen application and removal rates, etc.). The third-party shall provide the rationale for proposed vulnerability determinations. The Executive Officer will make the final determination regarding vulnerability designations.

If the GAR is not submitted to the board by the required deadline, the Executive Officer will designate default high/low vulnerability groundwater areas using such information as 1) those areas that have been identified by the State Water Board as Hydrogeologically Vulnerable Areas, 2) California Department of Pesticide Regulation groundwater protection areas, and 3) areas with exceedances of water quality objectives for which irrigated agriculture waste discharges may cause or contribute to the exceedance.

5. *Prioritization of high vulnerability groundwater areas.* The third-party may prioritize the areas designated as high vulnerability areas to comply with the requirements of this Order, including conducting monitoring programs and carrying out required studies. When establishing relative priorities for high vulnerability areas, the third party may consider, but not be limited to, the following:

- Identified exceedances of water quality objectives for which irrigated agriculture waste discharges are the cause, or a contributing source.
- The proximity of the high vulnerability area to areas contributing recharge to urban and rural communities where groundwater serves as a significant source of supply.
- Existing field or operational practices identified to be associated with irrigated agriculture waste discharges that are the cause, or a contributing source.
- The largest acreage commodity types comprising up to at least 80% of the irrigated agricultural acreage in the high vulnerability areas and the irrigation and fertilization practices employed by these commodities.
- Legacy or ambient conditions of the groundwater.
- Groundwater basins currently or proposed to be under review by CV-SALTS.
- Identified constituents of concern, e.g., relative toxicity, mobility.

Additional information such as models, studies, and information collected as part of this Order may also be considered in designating and prioritizing vulnerability areas for groundwater. Such data includes, but are not limited to, 1) those areas that have been identified by the State Water Board as Hydrogeologically Vulnerable Areas, 2) California Department of Pesticide Regulation groundwater protection areas, and 3) areas with exceedances of water quality objectives for which irrigated agriculture waste discharges may cause or contribute to the exceedance.

The Executive Officer will review and may approve or require changes to any third-party proposed high/low vulnerability areas and the proposed priority ranking. The vulnerability areas or any changes thereto, shall not be effective until third-party receipt of written approval by the Executive Officer. An interested person may seek review by the Central Valley Water Board of the Executive Officer's decision on the designation of high and low vulnerability areas associated with approval of the Groundwater Quality Assessment Report.

## **B. Management Practice Evaluation Program**

The third-party requirements specified in this MRP for the MPEP (sections IV.B and D) apply in the event that the third-party develops MPEP workplans; i.e. does not participate in the Group Option per section VIII.D.2.b of the Order. The goal of the Management Practice Evaluation Program (MPEP) is to determine the effects, if any, that irrigated agricultural practices<sup>8</sup> have on groundwater

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<sup>8</sup> In evaluating management practices, the third-party is expected to focus on those practices that are most relevant to the Members' groundwater quality protection efforts.

quality. A MPEP is required in high vulnerability groundwater areas and must address the constituents of concern described in the GAR. This section provides the goals, objectives, and minimum reporting requirements for the MPEP. As specified in section IV.D of this MRP, the third-party is required to develop a workplan that will describe the methods that will be utilized to achieve the MPEP requirements.

1. *Objectives.* The objectives of the MPEP are to:

- Identify whether existing site-specific and/or commodity-specific management practices are protective of groundwater quality within high vulnerability groundwater areas,
- Determine if newly implemented management practices are improving or may result in improving groundwater quality.
- Develop an estimate of the effect of Members' discharges of constituents of concern on groundwater quality in high vulnerability areas. A mass balance and conceptual model of the transport, storage, and degradation/chemical transformation mechanisms for the constituents of concern, or equivalent method approved by the Executive Officer, must be provided.
- Utilize the results of evaluated management practices to determine whether practices implemented at represented Member farms (i.e., those not specifically evaluated, but having similar site conditions), need to be improved.

Given the wide range of management practices/commodities that are used within the third-party's boundaries, it is anticipated that the third-party will rank or prioritize its high vulnerability areas and commodities, and present a phased approach to implement the MPEP.

2. *Implementation.* Since management practices evaluation may transcend watershed or third-party boundaries, this Order allows developing a MPEP on a watershed or regional basis that involves participants in other areas or third-party groups, provided the evaluation studies are conducted in a manner representative of areas to which it will be applied. The MPEP may be conducted in one of the following ways:

- By the third-party,
- by watershed or commodity groups within an area with known groundwater impacts or vulnerability, or
- by watershed or commodity groups that wish to determine the effects of regional or commodity driven management practices.

A master schedule describing the rank or priority for the investigation(s) of the high vulnerability areas (or commodities within these areas) to be examined under the MPEP shall be prepared and submitted to the Executive Officer as detailed in the Management Practices Evaluation Program Workplan section IV.D below.

3. *Report.* Reports of the MPEP must be submitted to the Executive Officer as part of the third-party's Monitoring Report or in a separate report due on the same date as the Monitoring Report. The report shall include all data<sup>9</sup> (including analytical reports) collected by each phase of the MPEP since the previous report was submitted. The report shall also contain a tabulated summary of data collected to date by the MPEP. The report shall summarize the activities conducted under the MPEP, and identify the number and location of installed monitoring wells and other types of monitoring devices. Within each report, the third-party shall evaluate the data and make a determination whether groundwater is being impacted by activities at farms being monitored by the MPEP.

<sup>9</sup> The data need not be associated with a specific parcel or Member.

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Each report shall also include an evaluation of whether the specific phase(s) of the Management Practices Evaluation Program is/are on schedule to provide the data needed to complete the Management Practices Evaluation Report (detailed below) by the required deadline. If the evaluation concludes that information needed to complete the Management Practices Evaluation Report may not be available by the required deadline, the report shall include measures that will be taken to bring the program back on schedule.

4. *Management Practices Evaluation Report.* No later than six (6) years after implementation of each phase of the MPEP, the third-party shall submit a Management Practices Evaluation Report (MPER) identifying management practices that are protective of groundwater quality for the range of conditions found at farms covered by that phase of the study. The identification of management practices for the range of conditions must be of sufficient specificity to allow Members of the third-party and staff of the Central Valley Water Board to identify which practices at monitored farms are appropriate for farms with the same or similar range of site conditions, and generally where such farms may be located within the third-party area (e.g., the summary report may need to include maps that identify the types of management practices that should be implemented in certain areas based on specified site conditions). The MPER must include an adequate technical justification for the conclusions that incorporates available data and reasonable interpretations of geologic and engineering principles to identify management practices protective of groundwater quality.

The report shall include an assessment of each management practice to determine which management practices are protective of groundwater quality. If monitoring concludes that management practices currently in use are not protective of groundwater quality based upon information contained in the MPER, and therefore are not confirmed to be sufficient to ensure compliance with the groundwater receiving water limitations of the Order, the third-party in conjunction with commodity groups and/or other experts (e.g., University of California Cooperative Extension, Natural Resources Conservation Service) shall propose and implement new/alternative management practices to be subsequently evaluated. Where applicable, existing GQMPs shall be updated by the third-party group to be consistent with the findings of the Management Practices Evaluation Report.

### **C. Groundwater Quality Trend Monitoring**

This section provides the objectives and minimum sampling and reporting requirements for Groundwater Quality Trend Monitoring. As specified in section IV.E of this MRP, the third-party is required to develop a workplan that will describe the methods that will be utilized to achieve the trend monitoring requirements.

1. *Objectives.* The objectives of Groundwater Quality Trend Monitoring are (1) to determine current water quality conditions of groundwater relevant to irrigated agriculture, and (2) to develop long-term groundwater quality information that can be used to evaluate the regional effects (i.e., not site-specific effects) of irrigated agriculture and its practices.
2. *Implementation.* To reach the stated objectives for the Groundwater Quality Trend Monitoring program, the third-party shall develop a groundwater monitoring network that will (1) be implemented over both high and low vulnerability areas in the third-party area; and will (2) employ shallow wells, but not necessarily wells completed in the uppermost zone of first encountered groundwater. The use of existing wells is less costly than installing wells specifically designed for groundwater monitoring, while still yielding data which can be compared with historical and future data to evaluate long-term groundwater trends. The third

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party may also consider using existing monitoring networks such as those used by AB 3030 and SB 1938 plans.

The third-party shall submit a proposed Trend Groundwater Monitoring Workplan described in section IV.E below to the Central Valley Water Board. The proposed network shall consist of a sufficient number of wells to provide coverage in the third-party geographic area so that current water quality conditions of groundwater and composite regional effects of irrigated agriculture can be assessed according to the trend monitoring objectives. The rationale for the distribution of trend monitoring wells shall be included in the workplan.

3. *Reporting.* The results of trend monitoring are to be included in the third-party's Monitoring Report and shall include a map of the sampled wells, tabulation of the analytical data, and time concentration charts. Groundwater monitoring data are to be submitted electronically to the State Water Board's GeoTracker Database and to the Central Valley Water Board.

Following collection of sufficient data (sufficiency to be determined by the method of analysis proposed by the third-party) from each well, the third-party is to evaluate the data for trends. The methods to be used to evaluate trends shall be proposed by the third-party in the Trend Groundwater Monitoring Workplan described in section IV.E below.

#### **D. Management Practices Evaluation Workplan**

The third-party, either solely or in conjunction with a Management Practices Evaluation Group (watershed or commodity based), shall prepare a Management Practices Evaluation Workplan. The workplan shall be submitted to the Executive Officer for review and approval. The workplan must identify a reasonable number of locations situated throughout the high vulnerability groundwater area(s), and encompassing the range of management practices used, the major agricultural commodities, and site conditions under which these commodities are grown. The workplan shall be designed to meet the objectives and minimum requirements described in section IV.B of this MRP.

1. *Workplan approach.* The workplan must include a scientifically sound approach to evaluating the effect of management practices on groundwater quality. The proposed approach may include:
  - groundwater monitoring,
  - modeling,
  - vadose zone sampling, or
  - other scientifically sound and technically justifiable methods for meeting the objectives of the Management Practices Evaluation Program.

Sufficient groundwater monitoring data should be collected or available to confirm or validate the conclusions regarding the effect of the evaluated practices on groundwater quality. Any groundwater quality monitoring that is part of the workplan must be of first encountered groundwater. Monitoring of first encountered groundwater more readily allows identification of the area from which water entering a well originates than deeper wells and allows identification of changes in groundwater quality from activities on the surface at the earliest possible time.

2. *Groundwater quality monitoring –constituent selection.* Where groundwater quality monitoring is proposed, the Management Practices Evaluation Workplan must identify:
  - the constituents to be assessed, and

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- the frequency of the data collection (e.g., groundwater quality or vadose zone monitoring; soil sampling) for each constituent.

The proposed constituents shall be selected based upon the information collected from the GAR and must be appropriate to determine if the management practices being evaluated are protective of groundwater quality. At a minimum, the baseline constituents for any groundwater quality monitoring must include those parameters required under trend monitoring.

3. *Workplan implementation and analysis.* The proposed Management Practices Evaluation Workplan shall contain sufficient information/justification for the Executive Officer to evaluate the ability of the evaluation program to identify whether existing management practices in combination with site conditions, are protective of groundwater quality. The workplan must explain how data collected at evaluated farms will be used to assess potential impacts to groundwater at represented farms that are not part of the Management Practices Evaluation Program's network. This information is needed to demonstrate whether data collected will allow identification of management practices that are protective of water quality at Member farms, including represented farms (i.e., farms for which on-site evaluation of practices is not conducted).
4. *Master workplan –prioritization.* If the third-party chooses to rank or prioritize its high vulnerability areas in its GAR, a single Management Practices Evaluation Workplan may be prepared which includes a timeline describing the priority and schedule for each of the areas/commodities to be investigated and the submittal dates for addendums proposing the details of each area's investigation. Should the third-party choose the group option with other interested third-parties, the third-party will proceed with the approved timeline of the group workplan, as identified in the Eastern San Joaquin River Watershed Order R5-2012-0116. Should the third party choose the individual option, the third-party will proceed with the individual workplan.
5. *Installation of monitoring wells.* Upon approval of the Management Practices Evaluation Workplan, the third-party shall prepare and submit a Monitoring Well Installation and Sampling Plan (MWISP), if applicable. A description of the MWISP and its required elements/submittals are presented as Appendix MRP-2. The MWISP must be approved by the Executive Officer prior to the installation of the MWISP's associated monitoring wells.

#### **E. Trend Monitoring Workplan**

The third-party shall develop a workplan for conducting trend monitoring within its boundaries that meets the objectives and minimum requirements described in section IV.C of this MRP. The workplan shall be submitted to the Executive Officer for review and approval. The Trend Monitoring Workplan shall provide information/details regarding the following topics:

1. *Workplan approach.* A discussion of the rationale for the number of proposed wells to be monitored and their locations is required in the workplan. The rationale needs to consider: 1) the variety of agricultural commodities produced within the third-party's boundaries (particularly those commodities comprising the most irrigated agricultural acreage), 2) the conditions discussed/identified in the GAR related to the vulnerability prioritization within the third-party area, and 3) the areas identified in the GAR as contributing significant recharge to urban and rural communities where groundwater serves as a significant source of supply.
2. *Well details.* Details for wells proposed for trend monitoring, including:
  - i. GPS coordinates;
  - ii. Physical address of the property on which the well is situated (if available);

- iii. California State well number (if known);
  - iv. Well depth;
  - v. Top and bottom perforation depths;
  - vi. A copy of the water well drillers log, if available;
  - vii. Depth of standing water (static water level), if available (this may be obtained after implementing the program); and
  - viii. Well seal information (type of material, length of seal).
3. *Proposed sampling schedule.* Trend monitoring wells will be sampled, at a minimum, annually at the same time of the year for the indicator parameters identified in Table 3 below.
4. *Workplan implementation and analysis.* This element will discuss proposed method(s) to be used to evaluate trends in the groundwater monitoring data over time.

**Table 3: Trend Monitoring Constituents**

Annual Monitoring Conductivity (at 25 °C)* (µmhos/cm) pH* in pH units Dissolved oxygen (DO)* (mg/L) Temperature* (°C) Nitrate as nitrogen (mg/L)
* field parameters
Trend monitoring wells are also to be sampled initially and once every five years thereafter for the following constituents of concern:  Total dissolved solids (TDS) (mg/L) General minerals (mg/L): Anions (carbonate, bicarbonate, chloride, and sulfate) Cations (boron, calcium, sodium, magnesium, and potassium)

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**V. Third-Party Reporting Requirements**

Reports and notices shall be submitted in accordance with section IX of the Order, Reporting Provisions.

**A. Quarterly Submittals of Surface Water Monitoring Results**

Each quarter, the third-party shall submit the previous quarter’s surface water monitoring results in an electronic format. The deadlines for these submittals are listed in Table 4 below.

**Table 4. Quarterly Surface Water Monitoring Data Reporting Schedule**

Due Date	Type	Reporting Period
1 March	Quarterly Monitoring Data Report	1 July through 30 September of previous calendar year
1 June	Quarterly Monitoring Data Report	1 October through 31 December of previous calendar year
1 September	Quarterly Monitoring Data Report	1 January through 31 March of same calendar year
1 December	Quarterly Monitoring Data Report	1 April through 30 June of same calendar year

Exceptions to due dates for submittal of electronic data may be granted by the Executive Officer if good cause is shown. The Quarterly Surface Water Monitoring Data Report shall include the following for the required reporting period:

1. An Excel workbook(s) containing all data records uploaded and/or entered into the CEDEN comparable database (surface water data).
2. The most current version of the third-party's eQAPP.
3. Electronic copies of all field sheets.
4. Electronic copies of photos obtained from all surface water monitoring sites, clearly labeled with the CEDEN comparable station code and date.
5. Electronic copies of all applicable laboratory analytical reports on a CD.
6. For toxicity reports, all laboratory raw data must be included in the analytical report (including data for failed tests), as well as copies of all original bench sheets showing the results of individual replicates, such that all calculations and statistics can be reconstructed. The toxicity analyses data submittals must include individual sample results, negative control summary results, and replicate results. The minimum in-test water quality measurements reported must include the minimum and maximum measured values for specific conductivity, pH, ammonia, temperature, and dissolved oxygen.
7. For chemistry data, analytical reports must include, at a minimum, the following:
  - a. A lab narrative describing QC failures,
  - b. Analytical problems and anomalous occurrences,
  - c. Chain of custody (COCs) and sample receipt documentation,
  - d. All sample results for contract and subcontract laboratories with units, RLs and MDLs,
  - e. Sample preparation, extraction and analysis dates, and
  - f. Results for all QC samples including all field and laboratory blanks, lab control spikes, matrix spikes, field and laboratory duplicates, and surrogate recoveries.

Laboratory raw data such as chromatograms, spectra, summaries of initial and continuing calibrations, sample injection or sequence logs, prep sheets, etc., are not required for submittal, but must be retained by the laboratory in accordance with the requirements of section X of the Order, Record-keeping Requirements.

If any data are missing from the quarterly report, the submittal must include a description of what data are missing and when they will be submitted to the Central Valley Water Board. If data are not loaded into the CEDEN comparable database, this shall also be noted with the submittal.

## **B. Annual Groundwater Monitoring Results**

Annually, by 1 May, the third-party shall submit the prior year's groundwater monitoring results as an Excel workbook containing an export of all data records uploaded and/or entered into the State Water Board GeoTracker database. If any data are missing from the report, the submittal must include a description of what data are missing and when they will be submitted to the Central Valley Water Board. If data are not loaded into the GeoTracker database, this shall also be noted with the submittal.

## **C. Monitoring Report**

The Monitoring Report shall be submitted by 1 May every year, with the first report due 1 May 2014. The report shall cover the monitoring periods from the previous hydrologic water year. A hydrologic water year is defined as 1 October through 30 September. The report shall include the following components:

1. Signed transmittal letter;

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2. Title page;
3. Table of contents;
4. Executive summary;
5. Description of the third-party geographical area;
6. Monitoring objectives and design;
7. Sampling site/monitoring well descriptions and rainfall records for the time period covered under the Monitoring Report;
8. Location map(s) of sampling sites/monitoring wells, crops and land uses;
9. Tabulated results of all analyses arranged in tabular form so that the required information is readily discernible;
10. Discussion of data relative to water quality objectives, and water quality management plan milestones, where applicable;
11. Sampling and analytical methods used;
12. Summary of Quality Assurance Evaluation results (as identified in the most recent version of the third-party's approved QAPP for Precision, Accuracy and Completeness);
13. Specification of the method(s) used to obtain estimated flow at each surface water monitoring site during each monitoring event;
14. Summary of exceedances of water quality objectives/trigger limits occurring during the reporting period and for surface water related pesticide use information;
15. Actions taken to address water quality exceedances that have occurred, including but not limited to, revised or additional management practices implemented;
16. Evaluation of monitoring data to identify spatial trends and patterns;
17. Summary of Nitrogen Management Plan information submitted to the third-party;
18. Summary of management practice information collected as part of Farm Evaluations;
19. Summary of mitigation monitoring;
20. Summary of education and outreach activities;
21. Conclusions and recommendations.

Additional requirements and clarifications necessary for the above report components are described below.

**Report Component (1) —Signed Transmittal Letter**

A transmittal letter shall accompany each report. The transmittal letter shall be submitted and signed in accordance with the requirements of section IX of the Order, Reporting Provisions.

**Report Component (8) — Location Maps**

Location map(s) showing the sampling sites/monitoring wells, crops, and land uses within the third party's geographic area must be updated (based on available sources of information) and included in the Monitoring Report. An accompanying GIS shapefile or geodatabase of monitoring site and monitoring well information must include the CEDEN comparable site code and name (surface water only) and Global Positioning System (GPS) coordinates (surface water sites and wells used for monitoring). The map(s) must contain a level of detail that ensures they are informative and useful. GPS coordinates must be provided as latitude and longitude in the decimal degree coordinate system (at a minimum of five decimal places). The datum must be either WGS 1984 or NAD83, and clearly identified on the map. The source and date of all data layers must be identified on the map(s). All data layers/shapefiles/geodatabases included in the map shall be submitted with the Monitoring Report.

**Report Component (9) – Tabulated Results**

In reporting monitoring data, the third-party shall arrange the data in tabular form so that the required information is readily discernible. The data shall be summarized in such a manner to clearly illustrate compliance with the data collection requirements of the MRP.

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**Report Component (10) — Data Discussion to Illustrate Compliance**

The report shall include a discussion of the third-party’s compliance with the data collection requirements of the MRP. If a required component was not met, an explanation for the missing data must be included. Results must also be compared to water quality objectives and trigger limits.

**Report Component (12) — Quality Assurance Evaluation (Precision, Accuracy and Completeness)**

A summary of precision and accuracy results (both laboratory and field) is required in the report. The required data quality objectives are identified in the most recent version of the third-party’s approved QAPP; acceptance criteria for all measurements of precision and accuracy must be identified. The third-party must review all QA/QC results to verify that protocols were followed and identify any results that did not meet acceptance criteria. A summary table or narrative description of all QA/QC results that did not meet objectives must be included. Additionally, the report must include a discussion of how the failed QA/QC results affect the validity of the reported data. The corrective actions to be implemented are described in the QAPP Guidelines.

In addition to precision and accuracy, the third-party must also calculate and report completeness. Completeness includes the percentage of all quality control results that meet acceptance criteria, as well as a determination of project completeness. For further explanation of this requirement, refer to the most recent version of the QAPP Guidelines. The third-party may ask the laboratory to provide assistance with evaluation of their QA/QC data, provided that the third-party prepares the summary table or narrative description of the results for the Monitoring Report.

**Report Component (14) — Summary of Exceedances**

A summary of the exceedances of water quality objectives or triggers that have occurred during the monitoring period is required in the Monitoring Report. In the event of exceedances for pesticides or toxicity in surface water, pesticide use data must be included in the Monitoring Report. Pesticide use information may be acquired from the agricultural commissioner. This requirement is described further in the following section on Exceedance Reports.

**Report Component (16) — Evaluation of Monitoring Data**

The third-party must evaluate its monitoring data in the Monitoring Report in order to identify potential trends and patterns in surface and groundwater quality that may be associated with waste discharge from irrigated lands. As part of this evaluation, the third-party must analyze all readily available monitoring data that meet program quality assurance requirements to determine deficiencies in monitoring for discharges from irrigated agricultural lands and whether additional sampling locations are needed. If deficiencies are identified, the third-party must propose a schedule for additional monitoring or source studies. Upon notification from the Executive Officer, the third-party must monitor any parameter in a watershed that lacks sufficient monitoring data (i.e., a data gap should be filled to assess irrigated agriculture’s effects on water quality).

The third-party should incorporate pesticide use information, as needed, to assist in its data evaluation. Wherever possible, the third-party should utilize tables or graphs that illustrate and summarize the data evaluation.

**Report Component (17) – Summary of Reported Nitrogen Data**

The third-party shall aggregate information from Members’ Nitrogen Management Plan Summary Reports to characterize the input, uptake, and loss of nitrogen fertilizer applications by specific crops in the San Joaquin County and Delta Area. The third-party’s assessment of Nitrogen Management Plan information must include, at a minimum, comparisons of farms with the same crops, similar soil conditions, and similar practices (e.g., irrigation management). At a minimum, the statistical summary of nitrogen consumption ratios by crop or other equivalent reporting units and

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the estimated crop nitrogen needs for the different crop types and soil conditions will describe the range, percentiles (10<sup>th</sup>, 25<sup>th</sup>, 50<sup>th</sup>, 75<sup>th</sup>, 90<sup>th</sup>) and any outliers. A box and whisker plot or equivalent tabular or graphical presentation of the data approved by the Executive Officer may be used. The nitrogen consumption ratio is the ratio of total nitrogen available for crop uptake (from sources including, but not limited to, fertilizers, manures, composts, nitrates in irrigation supply water and soil) to the estimated crop consumption of nitrogen. The summary of nitrogen management data must include a quality assessment of the collected information by township (e.g. missing data, potentially incorrect/inaccurate reporting), and a description of corrective actions to be taken, if necessary. The third-party will also provide an aggregate of the data submitted by their Members in an electronic format, compatible with ArcGIS, identified to at least the township level.<sup>10</sup>

**Report Component (18) – Summary of Management Practice Information**

The third-party will aggregate and summarize information collected from Farm Evaluations.<sup>11</sup> The summary of management practice data must include a quality assessment of the collected information by township (e.g. missing data, potentially incorrect/inaccurate reporting), and a description of corrective actions to be taken, if necessary. In addition to summarizing and aggregating the information collected, the third party will provide the individual data records used to develop this summary in an electronic format, compatible with ArcGIS, identified to at least the township level.<sup>13</sup>

**Report Component (19) – Mitigation Monitoring**

As part of the Monitoring Report, the third-party shall report on the CEQA mitigation measures reported by Members to meet the provisions of the Order and any mitigation measures the third-party has implemented on behalf of Members. The third-party is not responsible for submitting information that Members do not send them directly by the 1 March deadline (see section VII.E of the Order for individual Discharger mitigation monitoring requirements). The Mitigation Monitoring Report shall include information on the implementation of CEQA mitigation measures (mitigation measures are described in Attachment C of the Order), including the measure implemented, identified potential impact the measure addressed, location of the mitigation measure (township, range, section), and any steps taken to monitor the ongoing success of the measure.

**D. Surface Water Exceedance Reports**

The third-party shall provide surface water exceedance reports if monitoring results show exceedances of adopted numeric water quality objectives or trigger limits, which are based on interpretations of narrative water quality objectives. For each surface water quality objective exceeded at a monitoring location, the third-party shall submit an Exceedance Report to the Central Valley Water Board. The estimated flow at the monitoring location and photographs of the site must be submitted in addition to the exceedance report but do not need to be submitted more than once. The third-party shall evaluate all of its monitoring data and determine exceedances no later than five (5) business days after receiving the laboratory analytical reports for an event. Upon determining an exceedance, the third-party shall send the Exceedance Report by email to the third-party's designated Central Valley Water Board staff contact by the next business day. The Exceedance Report shall describe the exceedance, the follow-up monitoring, and analysis or other actions the third-party may take to address the exceedance. Upon request, the third-party shall also notify the agricultural commissioner of the county in which the exceedance occurred and/or the director of the Department of Pesticide Regulation.

*Surface water exceedances of pesticides or toxicity:* When any pesticide or toxicity exceedance is identified at a location that is not under an approved management plan for toxicity or pesticides, follow-up actions must include an investigation of pesticide use within the location's watershed

<sup>10</sup> The Member and their associated parcel need not be identified.

<sup>11</sup> Note that the evaluation of the reported management practices information is discussed in Appendix MRP-1 and will be part of the annual Management Plan Progress Report.

area. For toxicity exceedances, the investigation must include all pesticides applied within the area that drains to the monitoring site during the four weeks immediately prior to the exceedance date. The pesticide use information may be acquired from the agricultural commissioner, or from information received from Members within the same drainage area. Results of the pesticide use investigation must be summarized and discussed in the Monitoring Report.

#### **E. Basin Plan Amendment Workplan**

Should the third-party choose to pursue a Basin Plan Amendment as described in Section VIII.L. of the Order, the third-party must prepare a Basin Plan Amendment Workplan (BPAW) that includes the following elements:

1. A technical justification for initiating the basin plan amendment process including maps of the areas proposed for basin plan amendment. The justification must include an assessment of naturally occurring (background) concentrations of the constituent(s); evaluate the potential for irrigated agriculture to further degrade groundwater quality beyond background in the identified areas; and a preliminary evaluation as to whether controllable water quality factors (as defined in the Basin Plan) are reasonably likely to result in attainment of the applicable use(s);
2. A use attainability study plan to determine whether the beneficial use(s) proposed for de-designation may be attained through the application of current or anticipated technologies, whether groundwater within the proposed basin plan amendment area is currently being used for the beneficial use proposed for de-designation, and whether the groundwater proposed for de-designation meets any of the criteria set forth in the Basin Plan that the Board considers in making exceptions to beneficial use designations;
3. A description of how the third-party will coordinate the basin plan amendment process through CV-SALTS, if the amendment is based on elevated salt and/or nitrate concentrations;
4. A proposal for reduced reporting requirements for Members in the areas proposed for basin plan amendment. The third-party may propose that trend monitoring be reduced in those areas. The third-party may also propose that the requirement that the Management Practice Evaluation Program evaluate those areas be suspended. The reduced monitoring and reporting requirements shall be no less stringent than the requirements for low vulnerability areas;
5. A description of the monitoring and reporting required to complete the BPAW must be identified; and
6. A time schedule including workplan goals and milestones for completing BPAW items.

To the extent applicable, the above BPAW workplan elements may be met by existing efforts. However, the third-party must provide the information associated with the applicable element demonstrating that element's requirements are met.

The Executive Officer may approve the BPAW workplan if the Executive Officer determines that the BPAW workplan includes all of the required elements. To approve the workplan, the Executive Officer must conclude that the technical justification provides sufficient evidence indicating that waters within the identified high vulnerability areas would likely qualify for de-designation of a beneficial use or uses under the Basin Plan. Should the Executive Officer approve the BPAW workplan, the Executive Officer will also provide the applicable approved modifications to the monitoring and reporting program.

Annual updates on progress made toward BPAW goals and milestones, including any proposed adjustments to the time schedule, must be included in the Annual Monitoring Report.

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The Executive Officer may reinstate high vulnerability monitoring and reporting requirements if any of the following occur: 1) information gathered during implementation of the BPAW indicates a basin plan amendment is unlikely to be adopted, 2) the basin plan amendment is not likely to be brought before the board within five years of the original proposal date due to insufficient progress in meeting workplan goals and milestones, or 3) the basin plan amendment is not approved by the regional board or state water board.

#### **VI. Sediment Discharge and Erosion Assessment Report**

The third-party shall prepare a Sediment Discharge and Erosion Assessment Report. The report shall be submitted to the Executive Officer for review. The goal of the report is to determine which irrigated agricultural areas within the San Joaquin County and Delta Area are subject to erosion and may discharge sediment that may degrade surface waters. The objective of the report is to determine which Member operations are within such areas, and need to develop a Sediment and Erosion Control Plan. The report must be developed to achieve the above goal and objective and must at a minimum, provide a description of the sediment and erosion areas as a series of ArcGIS shapefiles with a discussion of the methodologies utilized to develop the report.

#### **VII. Water Quality Triggers for Development of Management Plans**

This Order requires that Members comply with all adopted water quality objectives and established federal water quality criteria applicable to their discharges. The *Water Quality Control Plan for the Sacramento River and San Joaquin River Basins* (Basin Plan) contains numeric and narrative water quality objectives applicable to surface water and groundwater within the Order's watershed area. USEPA's 1993 National Toxics Rule (NTR) and 2000 California Toxics Rule (CTR) contain water quality criteria which, when combined with Basin Plan beneficial use designations constitute numeric water quality standards. Table 5 of this MRP lists Basin Plan numeric water quality objectives and NTR/CTR criteria for constituents of concern that may be discharged by Members.

Table 5 does not include water quality criteria that may be used to interpret narrative water quality objectives, which shall be considered trigger limits. Trigger limits will be developed by the Central Valley Water Board staff through a process involving coordination with the Department of Pesticide Regulation (for pesticides) and stakeholder input. The trigger limits will be designed to implement narrative Basin Plan objectives and to protect applicable beneficial uses. The Executive Officer will make a final determination as to the appropriate trigger limits.

#### **VIII. Quality Assurance Project Plan (QAPP)**

The third-party must develop and/or maintain a QAPP that includes watershed and site-specific information, project organization and responsibilities, and the quality assurance components in the QAPP Guidelines. Chemical, bacteriological, and bioassay analyses shall be conducted at a laboratory certified for such analyses by the California Department of Public Health (DPH), except where the DPH has not developed a certification program for the material to be analyzed.

The San Joaquin County and Delta Area Coalition's existing QAPP was approved by the Executive Officer on 15 September 2008. The existing QAPP is acceptable for use by the third-party. Any necessary modifications to the QAPP for groundwater monitoring shall be submitted with the MPEP and groundwater trend monitoring workplans (section IV, MRP). Any proposed modifications to the approved QAPP must receive Executive Officer approval prior to implementation.

The Central Valley Water Board may conduct an audit of the third-party's contracted laboratories at any time in order to evaluate compliance with the most current version of the QAPP Guidelines. Quality control requirements are applicable to all of the constituents listed in the QAPP Guidelines, as well as any additional constituents that are analyzed or measured, as described in the

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appropriate method. Acceptable methods for laboratory and field procedures as well as quantification limits are described in the QAPP Guidelines.

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Table 5. Basin Plan Numeric Water Quality Objectives for the San Joaquin County and Delta Area.

Constituent / Parameter (Synonym)	Basin Plan Water Quality Objective	Source of Numeric Threshold (footnotes in parentheses are at bottom of table)	Numeric Threshold (a)	Units	G= Groundwater IS= Inland Surface Water	Numeric Threshold Protects Designated Beneficial Use(s) in the Water Body:								
						Groundwater			Inland Surface Waters					
						MUN- MCL	MUN- Toxicity	AGR	MUN- MCL	MUN- Toxicity	Aquatic Life & Consump.	AGR	CAS Number	
Boron, total	Chemical Constituents	Basin Plan. SJR, mouth of Merced R to Vernalis (15 Mar – 15 Sep)	2,000	ug/L	IS							X	7440-42-8	
		Basin Plan. SJR, mouth of Merced R to Vernalis (15 Mar – 15 Sep)	800 (b)	ug/L	IS									X
		Basin Plan. SJR, mouth of Merced R to Vernalis (16 Sep – 14 Mar)	2,600	ug/L	IS									X
		Basin Plan. SJR, mouth of Merced R to Vernalis (16 Sep – 14 Mar)	1,000 (b)	ug/L	IS									X
		Basin Plan. SJR, mouth of Merced R to Vernalis (critical year) (c)	1,300 (b)	ug/L	IS									X
Chlorpyrifos	Pesticides	Basin Plan. SJR from Mendota Dam to Vernalis; Delta Waterways (i); 1-hour average	0.025	ug/L	IS						X		2921-88-2	
		Basin Plan. SJR from Mendota Dam to Vernalis; Delta Waterways (i); 4-day average	0.015	ug/L	IS						X			
Coliform, fecal	Bacteria	Basin Plan (d) (e)	200/100	MPN/mL	IS				X				--	
		Basin Plan (d) (f)	400/100	MPN/mL	IS				X					
Coliform, total	Bacteria	Basin Plan	2.2/100	MPN/mL	G	X							--	
Conductivity at 25 C (Electrical conductivity)	Salinity	Basin Plan. See Table III-5 of Basin Plan.	variable	umhos/cm	IS								--	
		California Secondary MCL	900-1600	umhos/cm	G & IS	X	X		X	X				
Copper	Chemical Constituents	California Secondary MCL (total copper)	1,000	ug/L	G & IS	X			X	X			7440-50-8	
	Toxicity	California Toxics Rule (USEPA), (g) (dissolved copper)	variable	ug/L	IS						X			
Diazinon	Pesticides	Basin Plan. SJR from Mendota Dam to Vernalis; Delta Waterways (i); 1-hour average	0.16	ug/L	IS						X		50-29-3	
		Basin Plan. SJR from Mendota Dam to Vernalis; Delta Waterways (i); 4-day average	0.10	ug/L	IS						X			
Dissolved Oxygen, minimum	Dissolved Oxygen - minimum	Basin Plan. SJR between Turner Cut and Stockton (1 Sep – 30 Nov)	6.0	mg/L	IS						X		7782-44-7	
		Basin Plan. In all other Delta waters except for those constructed for special purposes and from which fish have been excluded or where the fishery is not important as a beneficial use.	5.0	mg/L	IS						X			
		Basin Plan. Waters designated WARM	5.0	mg/L	IS						X			
		Basin Plan. Waters designated COLD and/or SPWN	7.0	mg/L	IS						X			
Lead	Chemical Constituents	California Primary MCL (total lead)	15	ug/L	G & IS	X			X				7439-92-1	
	Toxicity	California Toxics Rule (USEPA) (g) (dissolved lead)	variable	ug/L	IS						X			

Constituent / Parameter (Synonym)	Basin Plan Water Quality Objective	Source of Numeric Threshold <i>(footnotes in parentheses are at bottom of table)</i>	Numeric Threshold (a)	Units	G= Groundwater IS= Inland Surface Water	Numeric Threshold Protects Designated Beneficial Use(s) in the Water Body:							CAS Number
						Groundwater			Inland Surface Waters				
						MUN- MCL	MUN- Toxicity	AGR	MUN- MCL	MUN- Toxicity	Aquatic Life & Consump.	AGR	
Molybdenum, total	Chemical Constituents	Basin Plan. SJR, mouth of Merced R to Vernalis	15	ug/L	IS							X	7439-98-7
Nitrate (as nitrogen)	Chemical Constituents	California Primary MCL	10	mg/L	G & IS	X	X		X	X			14797-55-8
Nitrite (as nitrogen)	Chemical Constituents	California Primary MCL	1	mg/L	G & IS	X	X		X	X			14797-65-0
Nitrate+Nitrite (as nitrogen)	Chemical Constituents	California Primary MCL	10	mg/L	G & IS	X	X		X	X			--
pH – minimum	pH	Basin Plan	6.5	units	G & IS	X	X		X	X			--
pH – maximum			8.5	units	G & IS	X	X		X	X			
Selenium, total	Chemical Constituents	Basin Plan. SJR, mouth of Merced R to Vernalis	12	ug/L									7782-49-2
		Basin Plan. SJR, mouth of Merced R to Vernalis (4-day mean)	5	ug/L									
		California Primary MCL	50	ug/L	G & IS	X			X				
	Toxicity	National Toxics Rule (USEPA), 4-day mean	5	ug/L	IS						X		
Simazine	Chemical Constituents	California Primary MCL	4	ug/L	G & IS	X	X		X	X			122-34-9
Temperature	Temperature	Basin Plan ( h )	variable		IS								
Total Dissolved Solids (TDS)	Chemical Constituents	California Secondary MCL, recommended level	500 – 1,000	mg/L	G & IS	X	X		X	X			--
Turbidity	Turbidity	Basin Plan. Where natural turbidity is <1 NTU	2	NTU	IS								
		Where natural turbidity is between 1 and 5 NTUs, increases shall not exceed 1 NTU.	variable; 2-6	NTU	IS								
		Where natural turbidity is between 5 and 50 NTUs, increases shall not exceed 20%.	variable; 6 - 70	NTU	IS								
		Where natural turbidity is between 50 and 100 NTUs, increases shall not exceed 10 NTUs.	variable; 60-110	NTU	IS								
		Where natural turbidity is greater than 100 NTUs, increases shall not exceed 10%.	variable	NTU	IS								

Constituent / Parameter (Synonym)	Basin Plan Water Quality Objective	Source of Numeric Threshold <i>(footnotes in parentheses are at bottom of table)</i>	Numeric Threshold (a)	Units	G= Groundwater IS= Inland Surface Water	Numeric Threshold Protects Designated Beneficial Use(s) in the Water Body:							
						Groundwater			Inland Surface Waters				
						MUN- MCL	MUN- Toxicity	AGR	MUN- MCL	MUN- Toxicity	Aquatic Life & Consump.	AGR	CAS Number
Zinc	Chemical Constituents	California Secondary MCL (total zinc)	5,000	ug/L	G & IS	X			X				7440-66-6
Zinc	Toxicity	California Toxics Rule (USEPA) (g) (dissolved zinc)	variable	ug/L	IS					X			

Footnotes to Table 8:

a	Numeric thresholds are maximum levels unless noted otherwise.
b	Monthly mean.
c	See Basin Plan for definition of Critical Year.
d	Applies in waters designated for contact recreation (REC-1).
e	Geometric mean of the fecal coliform concentration based on a minimum of not less than five samples for any 30-day period shall not exceed this number.
f	No more than ten percent of the total number of samples taken during any 30-day period shall exceed this number.
g	These numeric thresholds are hardness dependent. As hardness increases, water quality objectives generally increase.
h	The natural receiving water temperature shall not be altered unless it can be demonstrated to the satisfaction of the Water Board that such alteration does not adversely affect beneficial uses. However, at no time shall the temperature of WARM and COLD waters be increased more than 5 degrees F above natural receiving water temperature.
i	See Delta Waterways listed in Appendix 42 of the Basin Plan

Abbreviations:

CAS	Chemical Abstracts Service Registry Number
fw	freshwater
MCL	maximum contaminant limit
MUN	municipal and domestic supply

Beneficial Uses:

AGR	Agricultural water uses, including irrigation supply and stock watering
Aquatic Life & Consump.	Aquatic life and consumption of aquatic resources
MUN-MCL	Municipal or domestic supply with default selection of drinking water MCL when available
MUN-Toxicity	Municipal or domestic supply with consideration of human toxicity thresholds that are more stringent than drinking water MCLs