

STRAWMAN FOR DISCUSSION - Step 3: Evaluate EO List Pesticides (excluding zero use pesticides) for each Monitoring Watershed

3A: Available Monitoring Data

Obtain all available monitoring data for the pesticide in the watershed. Examine data quality, detection limits relative to reference values, sample timing relative to application and runoff timing. Select only high quality data (exclude non-detects when detection limits > reference values) and samples timed to capture drift or discharge/runoff.

- (1) Do **sufficient** samples exist to characterize the pesticide in the watershed at all vulnerable time periods? (**DPR defines "sufficient" as 20 in a county.**)
 - (2) Has sampling occurred in last 5 years?
 - (3) Are any measured values $\geq 10\%$ of reference value? (Take these pesticides directly to Step 3D unless sampling frequency during vulnerable time periods has been statistically sufficient to capture peak concentrations.)
- If yes to (1) and (2) and no to (3), not a monitoring priority.

3B: Use Patterns and Application Methods

Eliminate pesticides with **only** low-risk use patterns or application methods

--Low Risk Use Patterns: indoors

--Low Risk Application methods: containerized baits, traps, or devices; impregnated materials; spot applications (e.g., wasp nests)

3C: Environmental Fate

Eliminate pesticides unlikely to occur in water or sediments

--Hydrolysis half-life < 1 day (do not use this exclusion unless degradates are not water pollutants)

--High Volatility if vapor pressure $> 1 \times 10^{-4}$ mmHg and Henry's law constant > 100 Pa m^3/mol

3D: Site-Specific or Regulatory Basis for Inclusion or Exclusion

Inclusion: has enforceable drinking water standard, water quality objective, EPA water quality criteria; on 303(d) list (TMDL monitoring handled elsewhere); trend toward significantly increasing use; pesticide conditionally registered by DPR due to potential water pollution (=DPR flagged?)

Exclusion: Regulatory controls in place and demonstrated to prevent water pollution; growers have terminated or greatly reduced use; not used in a particular subwatershed

3E: Chemical Analysis Method

Availability of analytical methods with sufficiently sensitive/environmentally relevant detection limits.

3F: Final Selection

Prioritize:

- (1) pesticide with detections $> 10\%$ of reference value
- (2) pesticides without data
- (3) DPR "high exposure potential" pesticides: Aquatic, crops with gravity irrigation, crops with top acreages, winter rain season application, pre-emergent application.

Provide scientific explanation for decisions to not monitor pesticides with enforceable drinking water standards, water quality objectives, or water quality criteria.