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## Central Valley Regional Water Quality Control Board

4 April 2018

Tim Ashlock  
Buena Vista Coalition  
Post Office Box 756  
Buttonwillow, CA 93206

### **APPROVAL OF THE BUENA VISTA COALITION PESTICIDE MONITORING PLAN**

Thank you for your submittal of the Pesticide Monitoring Plan for the Buena Vista Coalition. The proposed pesticides and schedule for monitoring were identified based on guidance provided in the Pesticide Evaluation Protocol (PEP), issued on 29 November 2016, as required by section III.B.2. of the Monitoring and Reporting Program (MRP) Attachment B to Order R5-2013-0120 Waste Discharge Requirements General Order for Growers within the Tulare Lake Basin Area that are Members of a Third-party Group (Order). Staff reviewed the Plan for completeness and consistency with the PEP.

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

Coordination between the Tulare Lake Basin Coalitions and the Central Valley Water Board should take place to determine what a sufficient number of samples is for exclusion from monitoring based on historical sample results, given the ephemeral nature of monitored waterbodies in some areas of the Tulare Lake Basin.

Based on the attached staff memorandum, the Pesticide Monitoring Plan is approved and monitoring to be implemented immediately. The Plan covers pesticide monitoring from 1 October 2017 through 30 September 2018. If you have any questions or comments regarding this approval letter, please contact Susan Fregien by phone at (916) 464-4813 or by email at [Susan.Fregien@waterboards.ca.gov](mailto:Susan.Fregien@waterboards.ca.gov).

Sincerely,

*Original signed by Patrick Pulupa, Incoming Executive Officer for*

Pamela C. Creedon  
Executive Officer

Enclosure: Staff Review of Pesticide Monitoring Plan

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## Central Valley Regional Water Quality Control Board

TO: Sue McConnell  
Program Manager, Supervising WRCE  
**IRRIGATED LANDS REGULATORY PROGRAM**

FROM: Susan Fregien  
Senior Environmental Scientist  
**IRRIGATED LANDS REGULATORY PROGRAM**

DATE: 2 April 2018

SUBJECT: REVIEW OF THE BUENA VISTA COALITION PESTICIDE MONITORING PLAN

The Central Valley Water Board received a revised Pesticide Monitoring Plan (Plan) for the Buena Vista Coalition (Coalition) on 30 November 2017. The revised Plan was submitted in response to staff comments provided on the 1 September 2017 submittal. The Plan identifies the constituents and schedule for pesticide monitoring in surface water for 1 October 2017 through 30 September 2018.

Staff reviewed the Plan to determine compliance with requirements pursuant to section III.B.2. of the Monitoring and Reporting Program (MRP) Attachment B to Order R5-2013-0120 Waste Discharge Requirements General Order for Growers within the Tulare Lake Basin Area that are Members of a Third-party Group (Order), as well as the Pesticide Evaluation Protocol, issued by the Executive Officer on 29 November 2016. Overall, the Plan meets the requirements of the Order, and staff recommends approval of the Plan. A summary of the pesticide monitoring constituents and schedule is provided below.

### **Monitoring Sites, Parameters, and Schedule**

Pesticide monitoring is required at two sites: Main Drain at Highway 46 and Main Drain at Seventh Standard Road. Of the 376 pesticides on the Executive Officer list provided with the Pesticide Evaluation Protocol, 26 were identified for monitoring at the Main Drain monitoring sites. The constituents and schedules for monitoring are presented in Table 1.

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

Pesticides applied within the watershed were excluded from monitoring based on factors including environmental fate and transport properties such as high volatility, calculation of an aquatic life risk ratio of less than 50, and no commercially available analytical methods. Due to limited precipitation events, no exclusions were made based on historical monitoring results, which are limited. The Coalition used a human health risk ratio threshold of greater than 20 to identify whether a pesticide should be monitored based on human health criteria. Staff recommended a threshold of greater than 10 for human health. For this evaluation, the use of a

10 threshold or a 20 threshold has the same result. However, if the Coalition chooses to use a 20 threshold in future evaluations, a justification should be provided.

### **STAFF RECOMMENDATIONS**

The Plan successfully executed the steps outlined in the Pesticide Evaluation Protocol and complies with the requirements of the Order and MRP. Staff recommends approval of the Plan for the Buena Vista Coalition for pesticide monitoring required from 1 October 2017 through 30 September 2018, with monitoring to be implemented immediately upon approval of the Plan.

Coordination between the Tulare Lake Basin Coalitions and the Central Valley Water Board should take place to determine what a sufficient number of samples is for exclusion from monitoring based on historical sample results, given the ephemeral natures of monitored waterbodies in some areas of the Tulare Lake Basin.

Table 1. Buena Vista Coalition Pesticide Monitoring Plan

Pesticide Name	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Grand Total
Acetamiprid								X					1
Bifenthrin			X	X	X	X	X	X	X	X			8
Carbaryl			X	X	X	X	X	X	X				7
Chlorpyrifos	X	X	X	X	X	X	X	X	X	X	X		11
Clothianidin									X				1
Copper	X	X	X	X		X							5
Cyfluthrin		X	X	X	X	X	X	X					7
Cypermethrin			X	X			X						3
Dimethoate		X	X	X	X	X	X	X		X	X		9
Diuron									X				1
Flumioxazin	X	X										X	3
Imidacloprid		X	X	X	X								4
Lambda-Cyhalothrin		X	X	X	X	X	X	X	X				8
Malathion			X	X	X						X		4
Methomyl		X	X	X	X		X		X	X	X		8
Oryzalin	X	X										X	3
Oxyfluorfen	X	X	X	X	X	X	X	X	X	X	X	X	12
Paraquat Dichloride	X	X	X	X	X	X	X	X	X	X	X	X	12
Pendimethalin	X	X	X	X	X						X	X	7
Trifluralin			X	X									2
Chlorothalonil		X	X	X	X	X	X						6
Diazinon			X									X	2
Esfenvalerate	X				X	X	X			X		X	6
Permethrin				X	X	X	X	X	X				6
Pyraclostrobin				X	X	X							3
S-Metolachlor				X	X	X							3
Grand Total	8	13	17	19	17	14	13	10	10	7	7	7	142