
Central Valley Regional Water Quality Control Board

21 December 2018

Mr. David Hampton
Cawelo Water District Coalition
17207 Industrial Farm Road
Bakersfield, CA 93308

APPROVAL OF THE CAWELO WATER DISTRICT COALITION SURFACE WATER PESTICIDE MONITORING PLAN

Thank you for submitting the 2019 Pesticide Monitoring Plan for the Cawelo Water District Coalition. The proposed pesticides and schedule for surface water monitoring were identified based on guidance provided in the Pesticide Evaluation Protocol (PEP), as required by section III.B.2. of the Monitoring and Reporting Program (MRP) Attachment B to Order R5-2013-0120 *Waste Discharge Requirements General Order for Growers within the Tulare Lake Basin Area that are Members of a Third-party Group* (Order).

Staff determined that the 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.

Finding 23 of the Order notes the representative nature of the water quality monitoring required. Therefore, the beneficial uses of the monitored and represented waterbodies must be accounted for in the development of the Proposal. Exclusion of the human health risk criteria for purposes of selecting pesticides for monitoring is acceptable where the Municipal and Domestic Supply (MUN) beneficial use does not apply. If represented waterbodies are found to have this beneficial use, or where agricultural discharges can impact a downstream MUN waterway, human health risk criteria should be included in future pesticide evaluations.

Based on the attached staff memorandum, I approve the Pesticide Monitoring Plan for pesticide monitoring to be completed from 1 January 2019 through 31 December 2019. If you have any questions or comments regarding the review, or need any further information, please contact Yared Kebede at (916) 464-4828 or by email at Yared.Kebede@waterboards.ca.gov

Sincerely,

Original signed by

Patrick Pulupa
Executive Officer

Enclosure: Staff Review of Monitoring Plan Update

Central Valley Regional Water Quality Control Board

TO: Susan Fregien
Senior Environmental Scientist
Monitoring and Implementation Unit
Irrigated Lands Regulatory Program

FROM: Yared Kebede
Environmental Scientist
monitoring and Implementation Unit
Irrigated Lands Regulatory Program

DATE: 28 November 2018

SUBJECT: REVIEW OF THE CAWELO WATER DISTRICT COALITION SURFACE
WATER PESTICIDE MONITOTING PLAN

The Central Valley Water Board received a Pesticide Monitoring Plan (Plan) for the Cawelo Water District Coalition on 1 November 2018. The Plan identifies the constituents and schedule for pesticide monitoring in surface water from 1 January 2019 through 31 December 2019.

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). 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 scheduled at one site: Poso Creek at Zerker Road (Table 1). The constituents selected for monitoring (22 pesticides) were determined using three years of Pesticide Use Report (PUR) data (2014-2016) for the Poso Creek sub-watershed, as required by the Pesticides Evaluation Protocol. Pesticides that were not applied within this sub-watershed were removed from consideration. Degradates were then added to the list of pesticides under consideration and pesticides with the same toxicant in water were grouped for evaluation of the aquatic life risk ratios. The human health risk ratios were not determined because the Cawelo Water District Coalition's monitoring location ("Valley Floor Waters") is not designated as having Municipal and Domestic Supply (MUN) beneficial use in the Water Quality Control Plan for the Tulare Lake Basin.

Pesticides applied within the sub-watershed were excluded from monitoring based on factors including environmental fate and transport properties such as high volatility, calculation of an aquatic life risk ratio of less than 50, and no commercially available analytical methods. Due to limited precipitation events and the ephemeral nature of monitored waterbodies, no exclusions were made based on historical monitoring results, which are limited. The constituents and schedule for monitoring is presented in Table 1.

KARL E. LONGLEY ScD, P.E., CHAIR | PATRICK PULUPA, ESQ., EXECUTIVE OFFICER

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 Cawelo Water District Coalition for pesticide monitoring required from 1 January 2019 through 31 December 2019.

The Coalition should identify the waterbodies represented by the selected monitoring locations and their designated beneficial uses in future monitoring plans and address them appropriately.

Staff recommends that the Coalition consider human health risk criteria in future pesticide evaluations if there is potential for Coalition members to impact any waterbodies that have this beneficial use, or where agricultural discharges can impact a downstream MUN waterway.

Table 1: Poso Creek at Zerker Rd Monitoring Schedule

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
Copper	X	X	X	X		X	X	X	X		X		9
Cyprodinil				X	X								2
Imidacloprid				X	X	X							3
Pendimethalin	X	X									X	X	4
Pyraclostrobin					X	X	X						3
Pyridaben		X	X										2
Bifenthrin			X	X	X	X	X	X	X				7
Carbaryl				X	X	X	X						4
Chlorothalonil	X												1
Chlorpyrifos	X	X	X	X	X		X	X	X	X	X	X	11
Cyfluthrin				X	X	X	X	X	X				6
Cypermethrin				X	X								2
Lambda-Cyhalothrin	X			X	X	X	X	X					6
Malathion				X									1
Oxyfluorfen	X	X	X	X	X	X	X	X		X	X	X	11
Paraquat Dichloride	X	X	X	X	X	X	X	X	X	X	X	X	12
Permethrin				X	X					X			3
Esfenvalerate	X											X	2
Flumioxazin	X	X										X	3
Fenpropathrin				X	X	X	X	X	X	X			7
Diuron	X												1
Chloropicrin										X			1
Total	10	7	6	14	13	10	10	8	6	6	5	6	101