
Central Valley Regional Water Quality Control Board

15 February 2018

Mr. Michael Wackman
San Joaquin & Delta Water Quality Coalition
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2018 WATER YEAR MONITORING PLAN UPDATE - SAN JOAQUIN COUNTY AND DELTA WATER QUALITY COALITION

Thank you for submitting the 16 January 2018 addendum to modify the San Joaquin County and Delta Water Quality Coalition's (Coalition) approved Monitoring Plan Update (MPU) for the 2018 Water Year. The Coalition is proposing to update its current monitoring plan to include monitoring data from June through September 2017 that was not available at the time the Coalition submitted its MPU to staff.

Based on the information provided in the Coalition's MPU addendum and staff's evaluation, the Coalition is required to evaluate the potential risks or threats to water quality at certain Represented sites. Per the Order, when the Coalition observes a water quality objective or trigger limit exceedance at a Core site, the Coalition must evaluate similar risks at the Represented sites. By **15 March**, please respond to the staff recommendations discussing the parameters and monitoring sites listed in the attached memorandum.

If you have questions regarding this letter, please contact Chris Jimmerson at (916) 464-4859 or by email at Chris.Jimmerson@waterboards.ca.gov.

Sincerely,

Original signed by

Pamela C. Creedon
Executive Officer

Central Valley Regional Water Quality Control Board

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

FROM: Chris Jimmerson
Environmental Scientist
Monitoring and Implementation Unit
Irrigated Lands Regulatory Program

DATE: 29 January 2018

SUBJECT: REQUEST TO MODIFY THE APPROVED 2018 WATER YEAR MONITORING PLAN UPDATE – SAN JOAQUIN COUNTY AND DELTA WATER QUALITY COALITION

Based on the requirements in the Order R5-2014-0029-R1, the Coalition submitted its annual Monitoring Plan Update (MPU) on August 1 and scheduled an addendum to evaluate monitoring data that was not available at the time. The 15 January addendum is based on monitoring results from June through September 2017. The addendum provides updates to the 2 October approved monitoring schedule, with additional monitoring added to the schedule because of the exceedances observed from June through September. Staff agrees with the additional monitoring proposed by the Coalition to modify the approved 2018 WY monitoring schedule. This includes additional March and September sediment toxicity monitoring at Littlejohns Creek at Jack Tone road. However, staff disagrees with the Coalition’s rationale for not evaluating some of the represented sites for potential risks or threats to water quality. Staff provides additional consideration for the Coalition to evaluate potential risks or threats to water quality in the following discussion.

Monitoring Sites, Parameters, Schedule and Frequency

Staff reviewed the information provided in the addendum and the 2018 WY monitoring schedule. The addendum reported several exceedances during the period of June through September 2017. Table 1 below identifies the sites, dates, and parameters associated with the exceedances.

Table 1, reporting exceedances identified in the MPU addendum

SITE NAME	SAMPLE DATE	EXCEEDANCE
Bacon Island Pump @ Old River	7/18/2017	Arsenic Diuron
Drain @ Woodbridge Rd	7/18/2017	Arsenic
Union Island Drain @ Bonetti Rd	7/18/2017	Molybdenum
Drain @ Woodbridge Rd	8/22/2017	Arsenic
Union Island Drain @ Bonetti Rd	8/22/2017	Arsenic
Bacon Island Pump @ Old River	9/19/2017	<i>Selenastrum</i>
French Camp Slough @ Airport Way	9/19/2017	<i>Hyalella</i>
Union Island Drain @ Bonetti Rd	9/19/2017	<i>Selenastrum Hyalella</i>

Arsenic

All four arsenic exceedances occurred at three Core sites, where the current monitoring schedule is under an active arsenic management plan. Staff agrees that no updates to the current Management Plan monitoring schedule is required at this time.

Molybdenum

With the molybdenum exceedance at the Union Island Drain Core site, molybdenum Core monitoring will not change. Staff agrees that two storm and two irrigation events for molybdenum will continue as planned. Per the Order, when a Core site exceeds a trigger limit, the Coalition must evaluate similar threats to water quality associated with molybdenum at the Represented sites (Upper Roberts Island Drain). The addendum did not provide a sufficient risk assessment as the Order requires. If factors indicate a risk, the Coalition must perform monitoring, or where site access is not available, implement management plan actions.

Diuron

In July, a diuron exceedance occurred at the Bacon Island Core site. This is the first exceedance at this site within a three-year period. Although the approved PEP did not recommend diuron sampling at this site for the 2018 Water Year, the Coalition must evaluate risk at the associated four Represented sites because of the exceedance. Furthermore, the Coalition must monitor diuron for an additional year at Bacon Island. The PEP evaluates the last three years of pesticide use available. There may be current diuron use because that last three years would not have included July 2017. If pesticide use information or other factors indicate a risk, the Coalition must perform monitoring, or where site access is not available, implement management plan actions.

S. capricornutum

S. capricornutum exceedances occurred at two Core sites, Bacon Island Pump and Union Island Drain. As a result, staff agrees that the Coalition will initiate a management plan at Bacon Island to include focused outreach and toxicity monitoring. Since a *S. capricornutum* management plan is already underway at Union Island, staff agrees that the toxicity monitoring schedule will continue as planned at Bacon Island.

With respect to the Represented sites associated with the Bacon Island Core site, only Kellogg Creek along Hoffman lane is not currently under a *S. capricornutum* management plan. Staff agrees that the other sites will continue management plan monitoring as planned. However, due to the toxicity exceedance at the Core site, the Coalition will have to evaluate potential risk at Kellogg Creek along Hoffman Lane. If pesticide use information or other factors indicate a risk, the Coalition must either perform monitoring or where site access is not available, implement management plan actions.

With respect to the Union Island Drain Core site, staff agrees that no monitoring update is required at the Core site or Represented site because they are currently under *S. capricornutum* management plans.

H. azteca

Sediment exceedances occurred at two Core sites, French Camp Slough and Union Island Drain. Staff agrees that the exceedances at the Core sites will not modify the current Core monitoring.

The Central Valley Water Board previously approved management plan completions at two of the five French Camp Slough Represented sites before the noted sediment exceedances occurred. Despite the management plan approvals noted in the addendum, the toxicity exceedance at the Core site triggers additional risk assessment, per the Order. Staff agrees that

the Coalition will initiate representative monitoring at Littlejohns Creek. In addition, the Coalition must use pesticide use information or other factors to evaluate potential risk at the other represented sites. For these sites, the Coalition must provide adequate justification that no risk exists, perform monitoring, or where site access is not available, implement management plan actions.

With respect to the Represented site associated with the Union Island Drain Core site, the Coalition must justify that no risk exists, perform monitoring, or where site access is not available, implement management plan actions at Upper Roberts Island Drain. The Coalition has already monitored Upper Roberts Island Drain in 2015 WY through 2017 WY with no exceedances, which provides evidence to support reduced monitoring, but the Coalition must use pesticide use information or other factors to evaluate potential risks or threats to water quality that are associated with the Sept 2017 Core site *H. azteca* exceedance.

STAFF RECOMMENDATIONS

Per the Order Attachment B.III.A.2, the Coalition should initiate/continue monitoring or evaluate the potential for risks or threats to water quality that are associated with the exceedances shown in Table 2 below.

Table 2, Coalition to evaluate potential risk at Represented sites.

REPRESENTED SITE NAME	PARAMETER	
Upper Roberts Island Drain	Molybdenum	<i>Hyalella</i>
East Orwood Tract Drain	Diuron	
Kellogg Creek along Hoffman Lane	Diuron	<i>Selenastrum</i>
Roberts Island @ Whiskey Slough Pump	Diuron	
South McDonald Island Pump	Diuron	
Duck Creek @ Hwy 4	<i>Hyalella</i>	
Lone Tree Creek @ Jack Tone Rd	<i>Hyalella</i>	
Mormon Slough @ Jack Tone Rd	<i>Hyalella</i>	
Unnamed Drain to Lone Tree Creek @ Jack Tone Rd	<i>Hyalella</i>	