



SAN JOAQUIN COUNTY & DELTA WATER QUALITY COALITION

January 15, 2019

Patrick Pulupa
Chris Jimmerson
Irrigated Lands Regulatory Program
Central Valley Regional Water Quality Control Board
11020 Sun Center Drive, #200
Rancho Cordova, CA 95670-6114

Re: Submittal of 2019 Water Year Monitoring Plan Update Addendum for Waste Discharge Requirements General Order R5-2014-0029-R3 for Growers in the San Joaquin River County and Delta Area Watershed to account for monitoring data from June through September 2018.

Dear Mr. Pulupa,

On August 1st, 2018, the San Joaquin County and Delta Water Quality Coalition (SJCDWQC or Coalition) submitted the 2019 Water Year (WY) Monitoring Plan Update (MPU; approved September 17, 2018) report as specified in the Revised Waste Discharge Requirements General Order for Growers within the San Joaquin County and Delta Area that are Members of a Third-Party Group (No. R5-2014-0029-R3; WDR or Order). The Coalition used monitoring data through May 2018 in the 2019 WY MPU, and is now submitting an addendum to account for any monitoring changes as a result of monitoring data from June through September 2018.

From June through September 2018, there were exceedances of the WQTL for field parameters (DO and SC), *E. coli*, ammonia, arsenic, chlorpyrifos, pyrethroids (bifenthrin), and water column toxicity to *S. capricornutum*. Monitoring results from June through September 2018 resulted in additional monitoring being added for bifenthrin at Represented sites in Zone 2 for the 2019 WY.

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for knowingly submitting false information, including the possibility of fine and imprisonment for violations."

Submitted respectfully,

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2019 WY MPU Addendum

June– September 2018 Data

San Joaquin County and Delta Water Quality Coalition

Central Valley Regional Water Board

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SUMMARY

Based on the requirements in the Order R5-2014-0029-R3, a monitoring schedule is submitted annually in the Monitoring Plan Update (MPU) on August 1 prior to the monitoring Water Year (WY). The Coalition submitted the 2019 WY MPU on August 1, 2018 (approved September 17, 2018). The August 1 MPU reports include a review of data through May and the January 15 addendum includes an evaluation of exceedances and monitoring requirements based on data collected from June through September.

The Coalition reviewed exceedances from June through September based on the criteria outlined below. Sites with one or more exceedances of the WQTL in samples collected during this period have the potential to affect the monitoring schedule as described in the following scenarios:

1. The site is not currently in a management plan for the constituent and the exceedance of the WQTL results in a management plan requirement for the site. If so, the Coalition will review when MPM would need to occur. If the exceedance results in a management plan requirement for a Core site, the Coalition will review if additional monitoring at Represented sites is necessary.
2. If the site is already in a management plan for the constituent that exceeded the WQTL and no previous exceedances occurred in the same month, the Coalition will update the MPM schedule accordingly.
3. If the exceedance occurred at a Core site, the Coalition will also review if additional monitoring at Represented sites is necessary during the month of the exceedance.

UPDATES TO THE 2019 WY MPU

Monitoring from June through September 2018 resulted in exceedances of the WQTLs for field parameters (DO and SC), *E. coli*, ammonia, arsenic, chlorpyrifos, pyrethroids (bifenthrin), and water column toxicity to *Selenastrum capricornutum*. Exceedances of the WQTLs for field parameters, *E. coli*, ammonia, and arsenic do not affect monitoring and were not considered in this addendum. Table 1 includes the sampling locations and respective exceedances. Additional monitoring will be required at sites in Zone 2 due to the exceedance of the pyrethroid objective for bifenthrin.

Table 1. June through September 2018 exceedances and monitoring changes.

ZONE	SITE NAME	SAMPLE DATE	CHLORPYRIFOS	PYRETHROIDS	SELENASTRUM TOXICITY	ADDITIONAL MONITORING REQUIRED
2	French Camp Slough @ Airport Way	8/21/2018		1.925		X
	Unnamed Drain to Lone Tree Creek @ Jack Tone Rd	6/19/2018	0.038			
3	Drain @ Woodbridge Rd	6/19/2018			74	
4	Roberts Island @ Whiskey Slough Pump	7/17/2018			83	
5	Walthall Slough @ Woodward Ave	6/19/2018			76	
7	Union Island Drain @ Bonetti Rd	7/17/2018			65	

ADDITIONAL MONITORING REQUIRED

An evaluation of additional monitoring requirements for the 2019 WY is provided below based on the exceedance of the acute additive concentration goal unit (CGU) for pyrethroids (bifenthrin).

PYRETHROIDS (BIFENTHRIN)

The exceedance of the CGU for bifenthrin (1.925) occurred at French Camp Slough @ Airport Way during NM in August 2018. French Camp Slough @ Airport Way was a Core site when the exceedance occurred. The Coalition evaluated all Represented sites in Zone 2 for bifenthrin use to determine potential need for monitoring.

In order to assess the need to monitor for bifenthrin, the Coalition ran the Pesticide Evaluation Protocol (PEP) analysis for each Represented site in Zone 2. Table 2 includes additional monitoring requirements for bifenthrin in the 2019 WY. For each respective Represented site, the monitoring will count as Year 1 of the required two years of Represented site monitoring requirement for bifenthrin. Duck Creek @ Hwy 4 is the new Core site in Zone 2 beginning in the 2019 WY; monitoring will occur according the original PEP analysis included with the approved 2019 WY MPU.

Table 2. Zone 2 Represented site monitoring for bifenthrin in the 2019 WY.

Duck Creek @ Hwy 4 is the Core site in the 2019 WY. Pesticide monitoring will occur according to the PEP results in the original MPU.

Site	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
French Camp Slough at Airport Way					X	X	X	X	X				5
Littlejohns Creek @ Jack Tone Rd					X	X	X	X	X				5
Lone Tree Creek @ Jack Tone Rd					X	X	X	X					4
Mormon Slough @ Jack Tone Rd						X	X	X					3
Unnamed Drain to Lone Tree Creek @ Jack Tone Rd					X	X	X	X	X				5
Total					4	5	5	5	3				22

NO ADDITIONAL MONITORING REQUIRED

CHLORPYRIFOS

An exceedance of the WQTL for chlorpyrifos (0.038 ug/L) occurred at Unnamed Drain to Lone Tree Creek during MPM in June 2018. The site subwatershed is currently in a management plan for chlorpyrifos. The Coalition will continue conducting MPM as outlined in the approved 2019 WY MPU.

S. CAPRICORNUTUM TOXICITY

Samples collected from Drain @ Woodbridge Rd during NM in June 2018 were toxic to *S. capricornutum* (74% growth compared to the control). The June 2018 toxicity was the third toxic sample collected during the 2018 WY (previously in January and March 2018). As stated in the approved 2019 WY MPU, the Coalition scheduled MPM for toxicity to *S. capricornutum* in the 2019 WY in January, March, and June.

Samples collected from Roberts Island @ Whiskey Slough Pump during MPM in July 2018 were toxic to *S. capricornutum* (83% growth compared to the control). The site is already in a management plan for toxicity to *S. capricornutum* and monitoring will continue as outlined in the approved 2019 WY MPU.

Samples collected from Walthall Slough @ Woodward Ave during NM in June 2018 were toxic to *S. capricornutum* (76% growth compared to the control). The site is already in a management plan for toxicity to *S. capricornutum* and monitoring will continue as outlined in the approved 2019 WY MPU.

Samples collected from Union Island Drain @ Bonetti Rd during MPM in July 2018 were toxic to *S. capricornutum* (65% growth compared to the control). The site is already in a management plan for toxicity to *S. capricornutum* and monitoring will continue as outlined in the approved 2019 WY MPU.