

Central Valley Regional Water Quality Control Board

18 January 2019

Mr. Michael Wackman
San Joaquin County and Delta Water Quality Coalition
3294 Ad Art Road
Stockton, CA 95215

APPROVAL OF MANAGEMENT PLAN COMPLETION FOR SELECT CONSTITUENTS

Thank you for submitting the 16 November 2018 request to remove specific constituents from select San Joaquin County and Delta Water Quality Coalition (Coalition) site subwatershed management plans. The request proposes to remove seven site/constituent pairs from active management plan status and from the management plan monitoring schedule.

The Coalition has implemented management plans according to requirements in the Waste Discharge Requirements General Order R5-2014-0029-03 for Growers within the San Joaquin County and Delta Area that are Members of a Third-party Group (Order). The Coalition's approved Surface Water Management Plan has been implemented as a part of the Order. The conditions for requesting completion of a Management Plan outlined in the Order apply (Attachment B, Appendix MRP-1, Section III, pages 8 and 9).

Based on the information provided in the request letter and in the enclosed staff review, I approve the completion of management plans for the following five site/constituent pairs.

- Duck Creek at Hwy 4 (SC)
- French Camp Slough at Airport Way (diuron)
- Roberts Island @ Whiskey Slough Pump (pH)
- Terminous Tract Drain at Hwy 12 (arsenic)
- Union Island Drain @ Bonetti Rd. (chlorpyrifos)

Management Plan implementation must continue for Unnamed Drain to Lone Tree Creek at Jack Tone Rd. (lead) and at Union Island Drain at Bonetti (chlorpyrifos) because the monitoring data do not support management plan completion.

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

Patrick Pulupa
Executive Officer

Enclosures: Staff Review of Request to Remove Constituents from Management Plan –
San Joaquin County and Delta Water Quality Coalition

Central Valley Regional Water Quality Control Board

TO: Susan Fregien
Senior Environmental Scientist
IRRIGATED LANDS REGULATORY PROGRAM

FROM: Chris Jimmerson
Environmental Scientist
IRRIGATED LANDS REGULATORY PROGRAM

DATE: 2 January 2019

SUBJECT: REQUEST TO REMOVE SITE/CONSTITUENT PAIRS FROM MANAGEMENT
PLAN MONITORING – SAN JOAQUIN COUNTY AND DELTA WATER
QUALITY COALITION

The San Joaquin County and Delta Water Quality Coalition (Coalition) is required to implement management plans for constituents that exceed water quality objectives at the same site more than once in a three-year period per Order No. R5-2014-0029-R1 (Order). The Central Valley Water Board received a request from the Coalition on 16 November 2018 to remove a total of seven site/constituent pairs from the management plan monitoring schedule (i.e. management plan completion request). The site/constituent pairs are discussed in this memorandum.

The Coalition's management plans are subject to the requirements found in the Order. The following key components must be addressed in the request: (1) at least three years of compliance with receiving water limitations during the times of year when previous exceedances occurred including a consideration of periods of peak use when the parameter is likely to be present, (2) documentation of third-party education and outreach, (3) documentation of management practice implementation, and (4) demonstration of management practice effectiveness.

Staff evaluated the information provided by the Coalition on a case-by-case basis to determine whether the components for management plan completion have been addressed. One of the key components is addressing if there are at least three or more years with no exceedances during the times of the year when previous exceedances occurred. This requirement was not met for the lead management plan at Unnamed Drain to Lone Tree Creek at Jack Tone Rd. and the chlorpyrifos management plan at Union Island Drain at Bonetti Rd. because at least three years of monitoring data during times of past exceedances were not provided.

Table 1 presents the seven site/constituent pairs included in the request for management plan completion. There has been sufficient monitoring for five of the requested site/constituent pairs, demonstrating that the water quality problems are no longer occurring. In addition, documentation of outreach/education was provided, including documented implementation of management practices. Based on the water quality data and other evidence discussed below, staff recommends approval of management plan completion for five site/constituent pairs.

Table 1. Management Plans Monitoring Data Evaluation

Management Plan	Most Recent Exceedance	Monitoring Events Since Last Exceedance	Requirements for Completion Met?
I. Duck Creek @ Hwy 4			
Specific Conductance	4/21/2015	20	Yes
Chlorpyrifos	8/8/2015	17	No
II. French Camp Slough @ Airport Way			
Diuron	2/9/2015	29	Yes
III. ¹Roberts Island @ Whiskey Slough Pump			
pH	6/16/2015	27	Yes
IV. Terminous Tract Drain @ Hwy 12			
Arsenic	3/19/2013	39	Yes
V. ²Union Island Drain @ Bonetti Rd			
Chlorpyrifos	1/20/2015	33	Yes
VI. Unnamed Drain to Lone Tree Creek @ Jack Tone Rd			
Lead	9/16/2008	5	No

¹ In 2012, this site inherited management plans by replacing two other nearby monitoring sites to better represent discharges from the island.

² In 2014 this site inherited management plans by replacing two other nearby monitoring sites to better represent discharges from the island.

I. Duck Creek @ Hwy 4

The Coalition proposed specific conductance (SC) and chlorpyrifos for management plan completion.

Focused outreach and education to four targeted growers was conducted in 2017 and will continue through 2019. As a result of the outreach, growers implemented management practices to control runoff and reduced overall pesticide use. Surveys indicated the two most common implemented practices were 1) reduced use of pesticides found in exceedances, and 2) use of center grass rows, grass waterways, or grass filter strips.

a. Specific conductance

Staff verified that one SC exceedance has been observed at Duck Creek between 2004 and 2018. A single exceedance triggered a management plan because SC is under a Total Maximum Daily Load (TMDL), per the Basin Plan. Since 2015, three years of monitoring have taken place without an exceedance. Duck Creek is a Core monitoring site where SC monitoring will take place each month between October 2018 through September 2019, giving additional monitoring data to meet the monitoring needs of the TMDL. Based on the Coalition's outreach and no exceedances within the last three years, staff recommends approval of the management plan is complete.

SC	Month											
Sample Date	1	2	3	4	5	6	7	8	9	10	11	12
2018												
2017												
2016												
2015				765								
2014												
2013												
2012												
2011												
2010												
2009												
2008												
2007												
2006												
2005												
2004												

Legend
not sampled
sampled
exceedance

b. Chlorpyrifos

The Coalition’s original request did not report at least three years of April monitoring since the last exceedance. In December 2018, staff requested that the Coalition provide additional information regarding the April 2016/2017 monitoring period. At least three years of monitoring is required during the times of year of previous exceedances. The Coalition’s follow-up stated that during the April 2016/2017 monitoring period, monitoring did not take place because the site was either dry or it was a non-contiguous waterbody. Consequently, monitoring was unsuccessful in April 2016/2017 and cannot provide enough monitoring information to demonstrate that chlorpyrifos is no longer a problem. Monitoring should continue to collect at least one more year of April or May monitoring.

Staff verified that April through September chlorpyrifos monitoring will continue at Duck Creek during the 2019 and 2020 Water Year because it is a Core site. The Coalition should continue monitoring as described in the approved 2019 Water Year monitoring schedule.

Chlorpyrifos	Month											
Sample Date	1	2	3	4	5	6	7	8	9	10	11	12
2018												
2017												
2016												
2015				0.016				0.022				
2014												
2013												
2012												
2011												
2010					0.055		0.02	0.3	0.023			
2009						0.07	0.15	0.031				
2008				0.057		0.11	0.066	0.017	0.027			
2007							0.024		0.029			
2006					0.029				0.15			
2005												
2004												

Legend
not sampled
sampled
exceedance

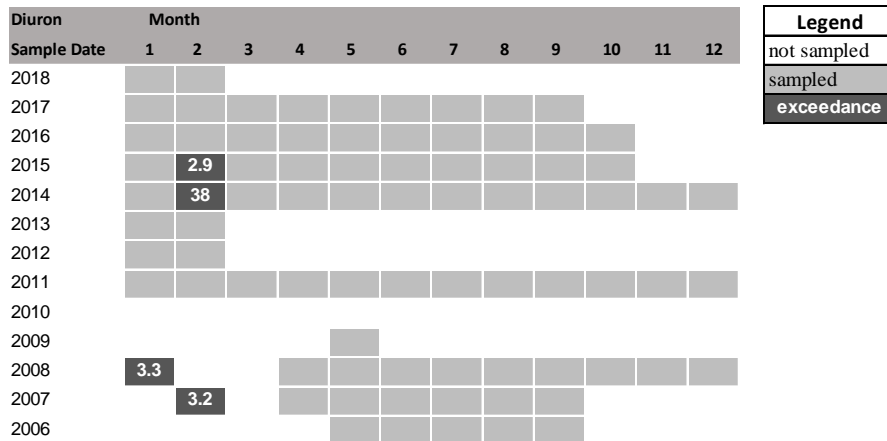
II. French Camp Slough at Airport Way

The Coalition proposed diuron for management plan completion. The Coalition conducted focused outreach in the site subwatershed from 2011 through 2013 and 2016 through 2018. Management

practice surveys indicated the three most commonly implemented practices were 1) reduced use of pesticides, 2) reduce runoff water volumes, and 3) installation of sprinkler or micro irrigation.

Diuron

The management plan was triggered by exceedances that occurred in 2008, 2014, and 2015. Since 2015, three years and 29 monitoring events have been completed with no additional diuron exceedances, demonstrating the effectiveness of implemented management practices. Staff recommends approval of the management plan completion request.

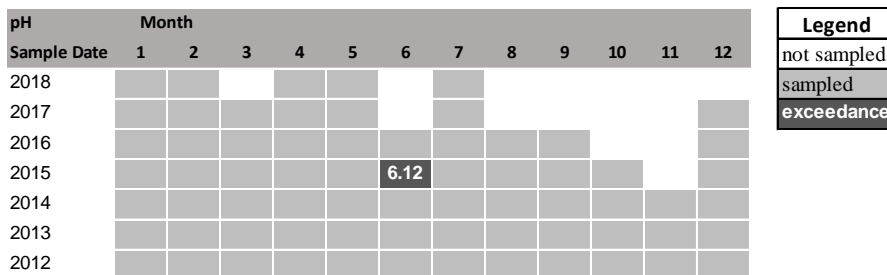


III. Roberts Island Drain at Whiskey Slough Pump

The Coalition proposed pH for management plan completion. In 2015, this site replaced two other sites on the island to better represent drainage from the entire island. In doing so, the site inherited a pH management plan. Since 2015, three years of monitoring have taken place without any pH exceedances at the sample site. The Coalition conducted focused outreach and education in the site subwatershed from 2013 through 2015. Follow-up surveys indicated the two most commonly implemented practices after contact were reduced pesticide use and reduced runoff.

pH

Three years of monitoring have taken place during irrigation season since 2015. The Order requires at least three years of compliance with receiving water limitations during the times of year when previous exceedances occurred. The Coalition has demonstrated compliance with the Order’s surface receiving water limitations. Staff recommends approval of the management plan completion request.



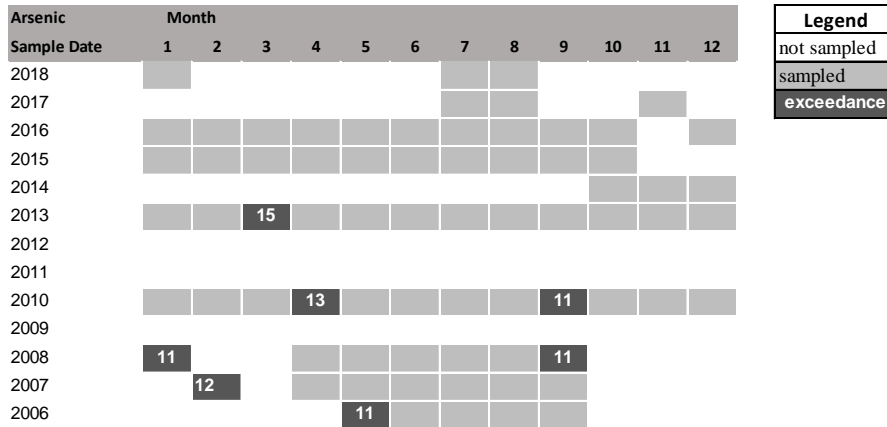
IV. Terminous Tract Drain at Hwy 12

The Coalition proposed arsenic for management plan completion. Since 2013, three years of monitoring have taken place without any arsenic exceedances at the sample site. The Coalition conducted focused outreach and education in the site subwatershed from 2011 through 2013 and

2016 through 2018. Follow-up surveys indicated the two most commonly implemented practices after contact were 1) reduce runoff water volumes, and 2) installation of sprinkler or micro irrigation.

Arsenic

Since 2013, three years and 39 monitoring events have been completed with no additional arsenic exceedances, demonstrating the effectiveness of implemented management practices. Per the Coalition’s approved Monitoring Plan, arsenic is collected once during the storm season (November - March) and once during the irrigation season (April - October). Staff recommends approval of the management plan completion request.

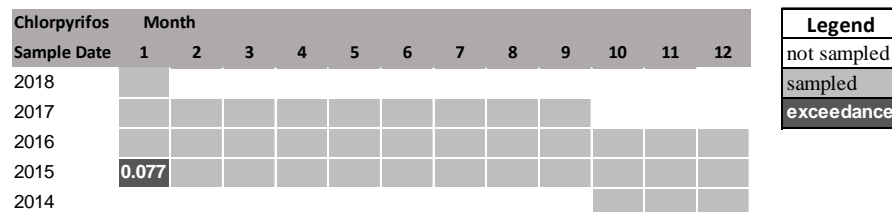


V. Union Island Drain at Bonetti Rd.

The Coalition proposed chlorpyrifos for management plan completion. In 2015, this site replaced two other sites on the island to better represent drainage from the entire island. In doing so, the site inherited a chlorpyrifos management plan. Since then, three years of monitoring have taken place without chlorpyrifos exceedances at the sample site. At the sites that were replaced by Union Island Drain, the Coalition conducted outreach through 2012. Furthermore, per the Coalition, the Pesticide Use Reports (PURs) indicate no use of chlorpyrifos in the site subwatershed since 2015.

Chlorpyrifos

Exceedances triggered the management plan in May 2015. Three years and 33 monitoring events have taken place since 2015 during the time of the January exceedance demonstrating chlorpyrifos is no longer a problem. Based on the current outreach efforts, PURS, and monitoring data, staff recommends approval of the management plan completion request.

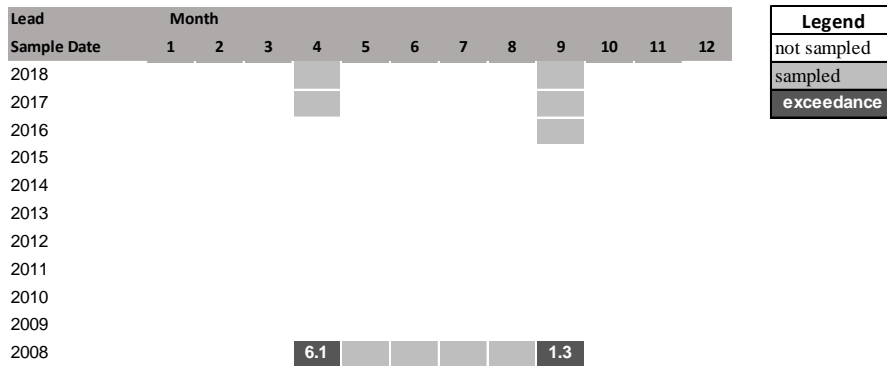


VI. Unnamed Drain to Lone tree Creek at Jack Tone Rd

The Coalition proposed lead for management plan completion. Since the 2008 exceedance, there have been five monitoring events at the sample site between 2016 and 2018. The Coalition conducted focused outreach and education in the site subwatershed from 2016 through 2018.

Lead

An exceedance triggered the management plan in September 2008. The Order requires at least three years of compliance with receiving water limitations during the times of year when previous exceedances occurred. The Coalition has three years of water quality data in the irrigation season, but not in the storm season. Consequently, the Coalition will need to continue sampling during the irrigation season to comply with this requirement. The Coalition may resubmit the lead management plan completion request once it meets all requirements.



Legend
not sampled
sampled
exceedance