



# California Regional Water Quality Control Board Central Valley Region

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Irrigated Lands Regulatory  
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FROM: Chris Jimmerson  
Environmental Scientist  
Irrigated Lands Regulatory  
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DATE: 23 March 2010

SIGNATURE: 

SUBJECT: 1 MARCH 2010 ANNUAL MONITORING REPORT - SAN JOAQUIN COUNTY  
AND DELTA WATER QUALITY COALITION

On 1 March 2010, the California Regional Water Quality Control Board, Central Valley Region (Central Valley Water Board) received the San Joaquin County and Delta Water Quality Coalition (Coalition) 1 March 2010 Annual Monitoring Report (AMR). The time period discussed in the AMR covers the period October 1, 2008 through December 2009. This is the first AMR report required pursuant to Monitoring and Reporting Program (MRP) Order No. R5-2008-0005. The MRP took effect in January 2009, but also includes monitoring from the previous MRP Order. October through December 2008 data is included in this AMR since this data had not yet been placed in a report.

In this memorandum, staff presents comments pursuant to Order No. R5-2008-0005, and the Coalition's August 2008 Monitoring and Reporting Program Plan (MRPP), which includes subsequent modifications. Staff also reviewed the Monitoring and Reporting Program Plan MRPP modifications to determine monitoring compliance for the reporting period. The Executive Officer approved Modifications to the MRPP on 17 December 2008 (site exchange) and 30 March 2009 (monitoring reduction).

The review section titles below and section numbers in parenthesis are the same as the titles used in the AMR Checklist (see attached). Staff derived the checklist directly from the MRP Order. Staff used the checklist to verify that the content presented in the AMR met the minimum prescribed report requirements.

Staff revisited the 21 May 2009 Semi AMR staff comment letter and the Coalition's subsequent response to verify that the Coalition included the comments and recommendations in this AMR. Staff determined that the Coalition considered those comments and incorporated them in this AMR.

#### A. SAMR Component Name from Check List

##### 1. Executive Summary (4.1- 4.3)

Staff verified that the Executive Summary included the required components of a brief summary of activities, monitoring results, and summarized conclusions.

California Environmental Protection Agency

**2. Rainfall Records**

**a) January 2009 – March 2009 (7.2.1)**

According to the MRP Order, page 10, "Monthly sampling events shall be scheduled to attempt to capture at least two storm runoff events per year. No more than one complete sample per month is required." Page 36 of the AMR detailed the Coalition's efforts to collect samples during the year's storm events. The Coalition uses 0.5 inches of rainfall within a 24 hour period to trigger a storm sampling event. Monthly sampling is prescheduled, and if a storm is forecasted within a week before a scheduled sampling event or within two days after the scheduled sampling event, the Coalition moves its sampling date to capture the storm. This strategy is necessary so that the laboratories will have the bioassay species and facilities available to conduct the tests. According to rainfall records, most storms did not produce enough runoff to collect a storm sample using the Coalition's trigger while the scheduling did not permit sample collection either. Even though in January 2009, rainfall produced enough runoff to capture a sample, the Coalition had already collected samples the week prior. A second event is not required according to the MRP. Consequently, the Coalition met the minimum requirements for attempting to capture storm events and the AMR provides a description on page 36 of efforts to capture the storm event. However, if the Coalition is not capturing storm events, the Coalition might not be able to determine if they are in compliance with the allocations and loading capacity (Diazinon and Chlorpyrifos Runoff in the Sacramento-San Joaquin Delta Waterways, Basin Plan page IV-36.03.01). The Coalition must still be able to meet the conditions of the MRP since dormant sprays are mostly applied during the storm season.

**3. Quality Assurance Evaluation (16.1 – 16.2)**

For chemistry analysis, the Coalition obtained 100% completeness for all the environmental samples. The correct number of duplicates and field blanks were collected above the minimum 5% rate. All quality assurance (QA) and quality control (QC) analyses met acceptance criteria for the reporting period at a level greater than 90%. This is tabulated in the Table 1 below. If the lab QC results were outside of the acceptability criteria range, these sample results were flagged, as indicated in the Coalition's data appendix, and thoroughly explained in the AMR text. The Coalition met all of the hold-times for all analytes.

**Table 1**

	Field Blank	Field Duplicate	Method Blank	Lab Control Spike	Lab Control Spike Duplicate	Matrix Spike	Matrix Spike Duplicate	Lab Duplicate	Surrogate Recovery
% Acceptance	99.6%	95.4%	99.9%	99.4%	98.7%	97.3%	97.5%	100%	98.4%

The QC results met the minimum acceptance criteria of 90%. The AMR thoroughly explains the QA/QC results for each constituent group. All field and analytical methods met the conditions of the Order. No sites were dry for the reporting period and one site could not be sampled due to lack of access (ferry service off-line). TIEs were performed

for all samples when survival or growth was 50 percent or less compared to the control and when the DO and ammonia levels were stable.

#### **4. Toxicity and Chemistry Laboratory Reports (14.2.1, 14.3.1)**

As per item 14 of the AMR components, the AMR included all signed laboratory reports in hard copy. However, as per a 2010 Quarterly Management Plan Meeting, the Coalition needs to include those reports in electronic form. Electronic copies of most laboratory reports were missing except October, November, and December 2009, which was provided with the AMR. Staff contacted the Coalition on 16 March 2010 to obtain the missing electronic laboratory reports. Staff received these on 1 April 2010 with the Management Plan Update Report.

#### **5. All Required Constituents for Each Site Have Reported Results (9.8)**

Table 4, page 21 of the AMR reports the normal monitoring schedule for the reporting period. The following inconsistencies have been noted by staff, which was discussed in the 4 May quarterly meeting. The Coalition revised Items (a) and (b) below on 4 June 2010 and will be revised in the next AMR.

- a) Walthall Slough is identified as a Core site. According to the Coalition's approved 30 March 2009 MRPP modification, it should be an Assessment site. The same inconsistency appears on page 31.
- b) Page 21 indicates Bear Creek, Duck Creek, Drain at Woodbridge, and Stanislaus as having sediment results. These sites were omitted from the monitoring schedule because of the 30 March 2009 MRPP modification. The table is inconsistent with the reported data.

Table 4 uses categories for the constituents monitored such as carbamates, organochlorines, and organophosphates. If the site is a Core site, the parameter of concern may be only a single constituent that belongs to that category needing analysis. The table should identify the constituent for a clearer table. Otherwise it could be interpreted that the entire group needs monitoring.

#### **6. Monitoring Objectives and Design**

##### **a) Monitoring Site Photos (18.1)**

Even though the photos for each monitoring event have been previously submitted with the Exceedance Reports, the MRP requires that monitoring photos be provided for each monitoring event. Appendix VIII did not include the full compliment of photos for the reporting period. The 2011 AMR must include a complete set of photos. Post review note: On 28 May, the Coalition submitted the required photos.

##### **b) Datum Identified on Map as Either WGS1984 or NAD 1983 (8.1.4)**

As per the Order, "the map datum must be either WGS 1984 or NAD83, and clearly identified on the map. The source and date of all data layers must be identified on the map(s)." The source and date of all the data layers is identified on the legend (page 16). However, the datum information is not clearly identified. The 2011 AMR must reference the datum on the maps.

**c) Monitoring Parameters (6.2.2)**

On page 5 and 28, the AMR indicated that the *E.coli* study determined that the source was predominately from human sources. This statement appears to be incorrect because *bacterioides* was the focus of the study, not *E.coli*. Statements regarding *E.coli* implicating human as a primary source do not align with the study design and interpretation of the data and actual results. Without further evaluation, the source of *E.coli* is not conclusive. This must be revised in the 2011 AMR.

**7. Copy of Chain of Custody Forms (13.1 – 13.3)**

The Coalition's Chain of Custody Forms submitted in the AMR met the reporting requirements of the Order.

**8. Pesticide Use Data (19.2)**

To investigate potential sources of exceedances, the Coalition evaluates upstream Pesticide Use Reports (PUR) information. As a result, the Coalition determined some of the potential sources of pesticide exceedances. However, not all exceedances were associated with pesticide applications such as DDT, aldrin, dieldrin and endrin, to name a few, because there are no registered products with these chemicals. Possible sources, sample dates, pesticide use dates and site proximity are adequately described in this section.

**9. Actions Taken to Address Water Quality Exceedances (20.2)**

During the reporting period, the Coalition participated in 22 meetings comprising 2,510 attendees, including some non-members. The Coalition is collaborating with County Agricultural Commissioners, Pest Control Advisors, and pesticide registrants to be more effective in providing recommendations of management practices.

**10. Conclusions and Recommendations (22.3)**

The Coalition has improved this section from the previous AMR by specifically addressing the five key program questions identified in the MRP. The Coalition did not include any recommendations. Recommendations will need to be provided in the next AMR.

On page 139, the AMR reports Beneficial Uses (MUN, AG, REC1, AQ Life) for the monitoring sites comparing 2004-2007, 2008, and the current reporting period. Staff compared the beneficial use status of years 2008 and 2009. On an annual basis, the beneficial use status improved in 2009 relative to 2008. However, water quality is not protective of all beneficial uses across most of the Coalition region. The AMR reporting period percent of exceedances are summarized in Table 2 and Table 3.

**Table 2 Percent of Exceedances Per Zone**

Zone 1	Zone 2	Zone 3	Zone 4	Zone 5	Coalition wide
1.30%	2.40%	7.80%	6.00%	3.90%	4.20%

**Table 3** (\*Total samples = 4)

Analyte Group	Percent Exceedance
Physical Parameters	28.90%
<i>E. coli</i>	16.80%
Carbamates	0.00%
Organochlorines	0.20%
Organophosphates	1.10%
Group A Pesticides	0.30%
Herbicides	0.00%
Metals	2.80%
Nutrients	1.40%
Water Column Toxicity	3.90%
Sediment Toxicity*	25.00%



Annual Monitoring Report Review Checklist

Report Name: 1 March 2010 SJCWQC AMR		Reviewer Name: Chris Jimmerson						
Submit Date: 3/1/2010		Review Date: 23 March 2010						
Item No.	AMR Component Name	A Acceptable	U Unacceptable	NI Not Included	NA Not Applicable	Page # (Section #)	Comments	Staff reference
1	Signed Transmittal Letter							
1.1	Transmittal letter included	X						
1.2	Penalty of Perjury Statement	X						
1.3	Signature of Authorized Coalition Representative	X						
1.4	Dated	X						
1.5	Submitted by Deadline	X						
1.6	Discussion of exceedances	X				2	Found in Exec Smry	
1.7	Discussion of actions taken or planned to correct noted exceedances (or reference to prior correspondence)	X				3	Found in Exec Smry	
2	Title Page							
2.1	Report title	X						
2.2	Date of the report	X						
2.3	Monitoring date range covered by the report			X			Found in Exec Smry	
2.4	Coalition Group name	X						
3	Table of Contents							
3.1	List of sections or chapters with page numbers	X						
4	Executive Summary							
4.1	Brief summary of activities	X				3,4		
4.2	Brief summary of results	X				4,5		
4.3	Brief summary of conclusions and recommendations	X				5, 28	States E.coli is predominately from human sources.	

Annual Monitoring Report Review Checklist

Item No.	AMR Component Name	A Acceptable	U Unacceptable	NI Not Included	NA Not Applicable	Page # (Section #)	Comments	Staff reference
5	Description of the Coalition Group Geographical Area							
5.1	General description of relevant geographic features of the Coalition area, such as location and extent of area, major landforms, land uses, vegetation types, crop types, climate patterns, key waterways, and cities	X				9	Total irrig acres sum for zones does not equal total irrig acres from pg 6.	
6	Monitoring Objectives and Design							
6.1	Monitoring Objectives							
6.1.1	List or brief description of monitoring objectives based on MRP Plan	X				17, 37	States collected 1 storm event - MRP requires attempt to collect 2 per yr, but no more than 1 event/mo.	
6.1.2	Reference to MRP Plan section and page number where detailed monitoring objectives are found			X			MRP cited, but not section or page number	
6.1.3	Reference to QAPP section and page number where detailed monitoring objectives are found			X			QAPP not referenced	
6.2	Monitoring Design							
6.2.1	Aligns with monitoring design description in MRP Plan	X						
6.2.2	Monitoring parameters			X		5, 28	E.coll study was not conclusive	
6.2.3	Monitoring frequency	X						
6.2.4	Time period of monitoring covered in the report	X						
6.2.5	Brief description of Management Plan monitoring	X				136		
6.2.6	Measurement strategies	X						
6.2.7	Source identification strategies	X				30	States Coalition will use monit data to determine if source is background or applied. When?	
6.2.8	Description of any deviation from the MRP Plan or QAPP	X						
6.2.2	Reference to MRP Plan section and page number where detailed monitoring design is found			X				



**Annual Monitoring Report Review Checklist**

Item No.	AMR Component Name	A Acceptable	U Unacceptable	NI Not Included	NA Not Applicable	Page # (Section #)	Comments	Staff reference
	<b>AMR Component Name</b>							
	Reference to QAPP section and page number where detailed monitoring design is found			X				
7	6.2.3 Sampling Site Descriptions and Rainfall Records for the time period covered under the AMR							
	7.1 Sampling Site Descriptions							
	7.1.1 Site Name	X				31		
	7.1.2 Site Identification Number	X				31		
	7.1.3 GPS Coordinates	X				31		
	7.1.4 Description of site representativeness (ie what geographic area, watershed, crop type does the site represent)	X				32		
	7.1.5 Site-specific monitoring type (core, assessment, special project) information	X				31		
	7.1.6 Any other unique information about the site or surrounding area	X				32-34		
	7.2 Rainfall Records							
	7.2.1 Graphic or narrative form, in inches of precipitation	X				36, 39-43		
8	8.1 Location Maps(s) of sampling sites, crops, and land uses							
	8.1.1 Map(s)							
	8.1.2 Sampling Sites with informative level of detail	X						
	8.1.3 Crop Types with informative level of detail	X						
	8.1.4 Land Uses with informative level of detail	X				10-16		
	8.1.5 Datum identified on map as either WGS 1984 or NAD 1983	X					Datum not identified Source listed on legend.	
	8.2 Source and date of all data layers identified on map	X				16		
	8.2.1 List or Table of Monitoring Site Information							
	8.2.2 Site name	X						
	8.2.3 Site identification number	X						
	8.2.3 GPS coordinates at latitude and longitude in decimal degrees to at least five decimal places	X						
9	Tabulated Results							

Annual Monitoring Report Review Checklist

Item No.	AMR Component Name	A Acceptable	U Unacceptable	NI Not Included	NA Not Applicable	Page # (Section #)	Comments	Staff reference
9.1	Data is in tabular form	X						
9.2	Data is clearly organized (ie readily discernable)	X						
9.3	Tabulated results agree with the electronic data submittal results	X					Reviewed exceedance Rpts	
9.4	Tabulated results agree with results discussed in the text	X						
9.5	Previously reported exceedances match exceedances identified in the AMR	X						
9.6	Water Hardness is reported for every water column sample	X					Apdx II	
9.7	Hardness-based metals criteria are calculated correctly	X						
9.7.1	Cadmium	X						
9.7.2	Copper	X						
9.7.3	Lead	X						
9.7.4	Nickel	X						
9.7.5	Zinc	X						
9.8	All required constituents for each site have reported results	X					Table 4, pg 21 is compliant but not consistent	
9.9	All toxic events were re-sampled and results reported				X			
10	<b>Data Discussion to Illustrate Compliance</b>							
10.1	Data discussion to illustrate compliance with the CG Conditional Waiver terms and conditions	X						
10.1.1	Where compliance not achieved, explanation of why required component not met	X					QC lab error, but explained	
10.2	Data discussion to illustrate compliance with water quality standards and trigger limits	X						
10.2.1	Where compliance not achieved, explanation of missing data and/or reason for non-compliance	X				70-72		
11	<b>Electronic data submitted in a SWAMP comparable format, either Option A or B</b>							
11.1	Option A. Electronic submittal data package in spreadsheet format							
11.1.1	Lab data is entered and submitted within the ILRP SWAMP comparable data spreadsheets				X		Not using Option A	
11.1.2	ILRP SWAMP comparable field sheets in paper copy				X		Not using Option A	

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Item No.	AMR Component Name	A	U	NI	NA	Page # (Section #)	Comments	Staff reference
		Acceptable	Unacceptable	Included	Not Applicable			
11.2	<u>Option B. Electronic submittal data package in SWAMP database format</u>							
	All field and lab data is uploaded into a SWAMP comparable database	X						
11.2.1	Electronic data is formatted to the most current <i>Required Data Submission Format</i> document	X						
11.2.2	Field sample results for lab analyses are included (page 21 #2, MRP)	X						
11.2.3	<u>Field Quality Control Results</u>							
11.2.4	Spikes	X			X			
11.2.4.1								
11.2.4.2					X			
11.2.4.3		X						
11.2.4.4					X			
11.2.4.5								
11.2.5	<u>Laboratory Quality Control Results</u>					Apdx III		
11.2.5.1	Spikes	X						
11.2.5.2	Blanks	X						
11.2.5.3	Surrogates	X						
11.2.5.4	Certified Reference Materials	X						
11.2.5.5	Duplicates	X			X			
11.2.5.6	Replicates	X						
11.2.6	Toxicity Analyses electronic submittal requirements	X						
11.2.6.1	Individual sample results	X						
11.2.6.2	Negative control summary results	X						
11.2.6.3	Replicate results	X						
11.2.6.4	Toxicity test water measurements (if daily measurements are taken then min and max of the range must be reported)	X					Reviewed for all species	
11.2.6.4.1	reported pH measurements in toxicity test waters	X					Reviewed for all species	
11.2.6.4.2	reported ammonia measurements in toxicity test waters	X					Reviewed for all species	
11.2.6.4.3	reported temperature measurements in toxicity test waters	X					Reviewed for all species	

Annual Monitoring Report Review Checklist

Item No.	AMR Component Name	A Acceptable	U Unacceptable	NI Not Included	NA Not Applicable	Page # (Section #)	Comments (for all species)	Staff reference
	11.2.6.4.4	X					Reported DO measurements in toxicity test waters	
	11.2.7	X					Data not meeting project QA acceptance guidelines is flagged and includes brief notes detailing the problem in the Comments field	
12	Description of sampling and analytical methods used							
12.1	Description of sampling methods used	X				55		
12.2	Description of analytical methods used	X				55		
13	Copies of chain-of-custody forms and sample receipt documentation							
13.1	Copies of all COCs are included	X				Apdx I	Reviewed 20%	
13.2	COCs are legible	X				Apdx I	Reviewed 20%	
13.3	COCs are completed accurately	X				Apdx I	Reviewed 20%	
14	Field Data Sheets, Lab Reports, Lab Raw Data							
14.1	Field Data Sheets							
	If Coalition chose Option A for electronic data submittal package, field data sheets are the ILRP SWAMP comparable field data sheets (see 11.1) in paper copy	X				Apdx IX		
	Copies of all field data sheets are attached to AMR or provided electronically in attached CD (see 14.1.1)	X				Apdx IX		
	Field sheets are completely filled in	X				Apdx IX		
	Field sheets are legible	X				Apdx IX		
14.2	Toxicity Lab Reports							
	All toxicity lab reports included as attachments to the AMR OR electronically on a CD			X			Only Oct, Nov, Dec 2009 on CD, but all hard copy provided.	
14.2.1								
14.2.2	All toxicity lab report copies submitted are complete	X					Reviewed Quarterly lab rpts.	
14.2.3	All toxicity lab reports are signed by authorized lab representative	X					Reviewed Quarterly lab rpts.	
14.2.4	Toxicity lab narrative describes all QC failures, analytical problems and anomalous occurrences	X					Reviewed Quarterly lab rpts.	

Annual Monitoring Report Review Checklist

Item No.	AMR Component Name	A	U	NI	NA	Page # (Section #)	Comments	Staff reference
		Acceptable	Unacceptable	Included	Not Applicable			
14.2.5	All raw lab data for acceptable toxicity tests is included	X					Reviewed Quarterly lab rpts.	
14.2.6	All raw lab data for failed toxicity tests is included	X					Reviewed Quarterly lab rpts.	
14.2.7	All original bench sheets showing results of individual replicates, such that all calculations and statistics can be reconstructed	X					Reviewed Quarterly lab rpts.	
14.2.8	All QC sample results including field and lab blanks, lab control spikes, matrix spikes, field and lab duplicates, and surrogate recoveries are included	X					Reviewed Quarterly lab rpts.	
14.3	<u>Chemistry Lab Reports</u>							
14.3.1	All chemistry lab reports included as attachments to the AMR <u>OR</u> electronically on a CD			X			Only Oct, Nov, Dec 2009 on CD.	
14.3.2	All chemistry lab report copies submitted are complete	X					Reviewed Quarterly lab rpts.	
14.3.3	All chemistry lab reports are signed by authorized lab representative	X					Reviewed Quarterly lab rpts.	
14.3.4	Chemistry lab narratives describe all QC failures, analytical problems and anomalous occurrences	X				62-72	Coalition narrative adequate	
14.3.5	All sample results for contract and subcontract labs including units, RLs and MDLs are included	X				55	RL for trifluralin decreased in July, 0.1 to 0.05 ug/L.	
14.3.6	Sample preparation, extraction, and analysis dates are included	X						
14.3.7	All QC sample results including field and lab blanks, lab control spikes, matrix spikes, field and lab duplicates, and surrogate recoveries are included	X				73-95		
15	<b>Associated laboratory and field quality control samples results</b>							
	These requirements covered under section 14	X						
16	<b>Summary of Quality Assurance Evaluation results</b>							
16.1	Quality Assurance Evaluation for LAB Data							

Annual Monitoring Report Review Checklist

Item No.	AMR Component Name	A Acceptable	U Unacceptable	NI Not Included	NA Not Applicable	Page # (Section #)	Comments	Staff reference
16.1.1	Acceptance criteria for all measurements of precision and accuracy are listed and coincide with ILRP requirements in MRP Attachment C, Appendix B	X				62-72	Coalition narrative adequate	
16.1.2	QA/QC results that did not meet acceptance criteria are identified in a table or narrative description that is prepared by the Coalition (not lab)	X				62-72	Coalition narrative adequate	
16.1.3	Discussion of how the failed QA/QC results affect the validity of the reported data	X				62-72	Coalition narrative adequate	
16.1.4	Discussion of corrective actions for QA/QC results that did not meet acceptance criteria is included	X				62-72	Coalition narrative adequate	
16.1.5	Calculation of completeness (percentage of QC data that met acceptance criteria and a determination of project completeness based on this)	X						
16.1.6	Document and discuss any adjustments made to acceptance criteria	X						
16.1.7	Laboratory exception reports are included when samples are reanalyzed due to exceedance of the linear range	X						
16.2	Quality Assurance Evaluation for FIELD Data							
16.2.1	Acceptance criteria for all measurements of precision and accuracy are listed and coincide with ILRP requirements in MRP Attachment C, Appendix B	X						
16.2.2	QA/QC results that did not meet acceptance criteria are identified in a table or narrative description that is prepared by the Coalition (not lab)	X						
16.2.3	Discussion of how the failed QA/QC results affect the validity of the reported data	X						
16.2.4	Discussion of corrective actions for QA/QC results that did not meet acceptance criteria	X						
16.2.5	Calculation of completeness (percentage of QC data that met acceptance criteria and a determination of project completeness based on this)	X						MRP Order Attach. B pg 2; Attach. C
16.2.6	Document and discuss any adjustments made to acceptance criteria				X			
17	Flow Monitoring Method(s)							
17.1	The method used to obtain flow measurement at each monitoring site during each monitoring event is listed	X				54		

Annual Monitoring Report Review Checklist

Item No.	AMR Component Name	A Acceptable	U Unacceptable	NI Not Included	NA Not Applicable	Page # (Section #)	Comments	Staff reference
18	Monitoring Site Photos							
18.1	Photos are included for each monitoring site for every monitoring event, either electronically or in hard copy			X		Apdx VIII	Missing photos for some events. All photos previously provided with exceedance rpts though.	
18.2	Each photo is clearly labeled with site ID and date	X				Apdx VIII	For the photos provided	
18.3	Photos are descriptive and useful	X				Apdx VIII	For the photos provided	
19	Summary of Exceedance Reports submitted during the reporting period and related pesticide use information							
19.1	Summary of Exceedance Reports submitted during the AMR period	X				Apdx V		
	Summary includes all needed exceedance reports	X				Apdx V		
19.2	Pesticide Use Data							
19.2.1	Pesticide use data is included for all pesticide and toxicity exceedances occurring during the AMR time period (except those that fall under a Mgt Plan)	X				Apdx IV		
19.2.2	Pesticide use data is directly relevant to the monitoring sites where exceedances occurred	X				113		
19.2.3	Pesticide use data includes all pesticides applied within the monitoring site drainage area during the four weeks prior to the measured exceedance	X				96, 113	Any outstanding PUR data will be provided in 6/30/10 addendum.	
20	Actions Taken to Address Water Quality Exceedances							
20.1	Discussion of actions taken to address water quality exceedances during the time frame of the AMR is included	X				127		
20.2	Actions taken to address the exceedances are adequate	X				127-131		
21	Status update on preparation and implementation of all management plans and other special projects							
22	Conclusions and Recommendations							

**Annual Monitoring Report Review Checklist**

Item No.	AMR Component Name	A Acceptable	U Unacceptable	NI Not Included	NA Not Applicable	Page # (Section #)	Comments	Staff reference
22.1	Conclusions are supported by the data presented in the AMR	X				138-144		
22.2	Discussion is adequately detailed	X				138-144		
22.3	Recommendations are appropriate and adequately detailed			X		138-144	Recommendations not included.	