



# California Regional Water Quality Control Board Central Valley Region

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DATE: 12 December 2008

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SUBJECT: 30 JUNE 2008 SEMI-ANNUAL MONITORING REPORT - SAN JOAQUIN COUNTY  
AND DELTA WATER QUALITY COALITION

On 30 June, the California Water Quality Control Board, Central Valley Region (Regional Water Board) staff (staff) received the San Joaquin County and Delta Water Quality Coalition (Coalition) 30 June 2008 Semi-Annual Monitoring Report (SAMR). Staff reviewed the SAMR to evaluate it for the required reporting conditions described in Order No. R5-2005-0833 (Order).

In this memorandum, staff presents their comments pursuant to the Order, and Monitoring and Reporting Plan (MRPP). The review is divided into two parts: (A) a discussion of administrative and compliance aspects and (B) a discussion of analytical aspects. The section titles in the two parts are the same as the titles used in the SAMR.

Staff revisited the 1 April 2008 SAMR staff comment letter and the Coalition's subsequent response to verify that the Coalition included the comments and recommendations in this SAMR. Staff determined that the Coalition considered those comments and incorporated changes that were reported in this SAMR. Among other revisions, the Coalition reinitiated *E.coli* sample collection at Mokelumne River @ Bruella Rd and other modifications.

## A. ADMINISTRATIVE AND COMPLIANCE

### 1. Executive Summary

Page 3 of the Executive Summary lists the number of exceedances reported during the reporting period. Staff found inconsistencies between the exceedance tables and the text, as noted below, as follows:

- a) Text reads five dissolved oxygen (DO) exceedances, while Table 27 reports nine.
- b) Text reads seven specific conductance exceedances, while Table 27 reports 18.

**2. Description of Watershed**

The SAMR reported the required watershed description elements: boundaries, climate, soil, hydrology, valuable aquatic resources, beneficial uses, and water body size designation.

Figure 1 on page eight reports land use and the Coalition's sampling sites. Staff recommends choosing another color for the sample point locations since green blends with the map background.

**3. Storm Season Monitoring 2008**

During the reporting period, the Coalition collected samples on 23 January, 18 March, and 9 April. The sample dates included Storm 1, Sediment 1, and follow-up sampling to Sediment 1, respectively. The first storm season monitoring event took place on 23 January 2008 after the dormant spraying. The second Storm monitoring event appropriately did not take place because there was insufficient rain and runoff to collect samples.

**4. Chain of Custody Forms**

Appendix II, the 23 January water column toxicity chain of custody form is missing for six of the 15 sites sampled on 23 January. The missing chains of custody need to be added to the SAMR.

**5. Precision and Accuracy**

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 storm season at a level greater than 90% except the Matrix Spike (88%). This is tabulated in the table below. If the lab QCs were outside of acceptability criteria range, these sample results were flagged. Finally, the Coalition met all of the hold-times for all analytes including toxicity.

	Field Blank	Field Duplicate	Method Blank	Lab Control Spike	Lab Control Spike Duplicate	Matrix Spike	Matrix Spike Duplicate	Lab Duplicate	Surrogate Recovery
% Acceptance	95	92	100	100	100	88	100	100	94

**6. Summary of Management Practices**

Table 31 lists Landguard™ as a management practice. This management practice should be removed from the table in the next SAMR since the manufacturer discontinued this product.

**7. Actions Taken to Address Water Quality Impacts**

Table 33 reports all of the Coalition's actions relevant to the exceedances in the storm season. The Coalition conducted six grower outreach meetings informing growers of exceedances and management practices. It also held meetings with individual growers that may have the ability to change practices that will reduce exceedances from suspected sources. The Coalition's 30 September Management Plan provides additional discussion of efforts to address exceedances.

## 8. Conclusions and Recommendations

As a result of past exceedances and exceedances reported during the SAMR reporting period, the Coalition prepared a draft Management Plan that was submitted on 30 September 2008. The Coalition also created a strategy to document and evaluate management practice effectiveness.

On page 121 of the SAMR, the Coalition describes a database it is developing to enable it to track its members by parcel / township / range / section, and crop on a real-time basis. The Coalition should quantify what the typical time period is meant by real-time because the most recent cropping information may be several months old if using pesticide use reports. If the Coalition is using Department of Water Resources cropping information the most recent information provided by DWR may be years old.

## B. ANALYTICAL ASPECTS

### 1. Monitoring and Analysis

Pages 32 and 33 describe the Coalition's monitoring for all Phase II pesticides at Phase I and Phase II sites. Staff acknowledges the Coalition's extra effort with pesticide Phase II monitoring.

The Coalition completed its storm season monitoring schedule at its 15 monitoring sites for all parameters and follow-up resamples measuring at 100% completeness. Kellogg Creek along Hoffman Lane was not sampled due to dryness. In addition, metal and nutrient sampling was not conducted at six sites since these are still in Phase I.

For the sample site Mokelumne River @ Bruella Road, the Coalition reinitiated *E. coli* sampling at this site in response to staff's 26 February 2008 SAMR comments, as described on page 33.

Appendix I reported East San Joaquin Water Quality Coalition monitoring results. However, the electronic SAMR included the San Joaquin County and Delta Water Quality Coalition monitoring results. The Coalition needs to resubmit a hard copy of Appendix I to include the San Joaquin County and Delta Water Quality Coalition results.

Table 30, where the results indicated a 50% or greater difference in test organism mortality between the ambient and laboratory sample, the Coalition conducted all necessary Toxicity Identification Evaluations (TIEs). TIE results indicated that suspected toxicants include non-polar organics, cationic metals, and organophosphates.