
Central Valley Regional Water Quality Control Board

22 March 2012

Mr. Michael Wackman
San Joaquin & Delta Water Quality Coalition
3422 W. Hammer Lane, Suite A
Stockton, CA 95219

Mr. Mike Johnson, Program Manager
MLJ-LLC
632 Cantrill Drive
Davis, CA 95618

REQUEST TO REMOVE ANALYTES FROM MANAGEMENT PLAN MONITORING – SAN JOAQUIN COUNTY AND DELTA WATER QUALITY COALITION

Thank you for submitting the 6 January 2012 request to remove analytes from the San Joaquin County and Delta Water Quality Coalition (Coalition) Management Plan. The request includes the Coalition's rationale for removing analytes (i.e. determining that these Management Plans are complete) from specific monitoring sites in its Management Plan (see Table 1 in attachment). In accordance with the Coalition's Management Plan, if there has been two or more years of Management Plan monitoring without an exceedance of a water quality trigger, then the Coalition may petition the Central Valley Water Board to remove it from the Management Plan.

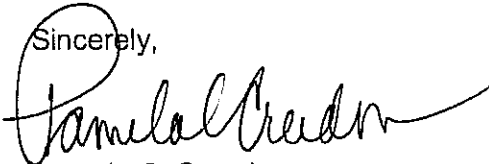
To facilitate the review process, staff initially addressed the analytes requested for the Duck Creek at Highway 4 (pH, diazinon, *Selenastrum* toxicity) and French Camp Slough at Airport Way (dieldrin) sites. Staff will address the remaining five sites tabulated in the attached memorandum in subsequent memoranda.

The attached memorandum presents staff's analysis of the information provided in the Coalition's request. In summary, staff determined that there was sufficient evidence to support completion of the Management Plans for these sites and analytes. Based on staff's analysis, I approve the Coalition's request to consider those Management Plans complete. Therefore, Management Plan monitoring is not required for these site/analytes and the Coalition will continue with the Assessment and Core monitoring schedule.

I commend the Coalition for successfully implementing the Management Plan for these analytes. The Coalition should continue aggressive outreach efforts to ensure these water quality problems do not recur. In accordance with the Sacramento San Joaquin Basin Plan, if the Coalition observes more than one exceedance within a three year period for any of these analytes going forward, then the Coalition must revert back to Management Plan implementation for those analytes.

If you have questions, please contact Chris Jimmerson at (916) 464-4859, or by E-mail at cjimmerson@waterboards.ca.gov.

Sincerely,


A handwritten signature in black ink, appearing to read "Pamela C. Creedon". The signature is fluid and cursive, with a large initial "P" and a long, sweeping underline.

Pamela C. Creedon
Executive Officer

Attachment – staff memorandum

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: 7 March 2012

SUBJECT: REQUEST TO REMOVE ANALYTES FROM MANAGEMENT PLAN
MONITORING – SAN JOAQUIN COUNTY AND DELTA WATER QUALITY
COALITION

The California Regional Water Quality Control Board, Central Valley Region, (Central Valley Water Board) received a request from the San Joaquin County and Delta Water Quality Coalition (Coalition) on 6 January 2012 to consider the Management Plans for certain analytes complete. The request proposes to remove analytes for specific monitoring sites from the Coalition's current Management Plan monitoring schedule (Table 1). To facilitate the review process, staff will address the Duck Creek at Highway 4 and French Camp Slough at Airport Way sites in this memorandum and address the remaining sites in Table 1 in subsequent memoranda.

The Coalition does not propose to remove analytes from its Core or Assessment monitoring schedule or to remove the site subwatershed from the Management Plan because Management Plan monitoring may be ongoing for other analytes.

Table 1(● = subject to this memorandum, X = petitioned for removal)

Site Subwatershed	Dissolved Oxygen		Specific Conductivity	Copper (Total & Dissolved)	Lead (Total & Dissolved)	Diazinon	Dieldrin	Duron	Simazine	Carbendathia Toxicity	Pimephates Toxicity	Selenastrum Toxicity	Hyatella Toxicity
		pH											
A Duck Creek @ Hwy 4		●				●						●	
B French Camp Slough @ Airport Way							●						
C Grant Line Canal @ Clifton Court Rd				X	X								
D Lone Tree Creek @ Jack Tone Rd			X	X		X		X				X	X
E Mokelumne River @ Bruella Rd	X			X									
F Terminus Tract Drain @ Hwy 12											X	X	
G Unnamed Drain to Lone Tree Creek @ Jack Tone Rd								X	X	X		X	

KARL E. LONGLEY SC.D., P.E., CHAIR | PAMELA C. GREEDON, EXECUTIVE DIRECTOR

Central Valley Water Board staff (staff) reviewed the Coalition's request and developed recommendations using a set of evaluation factors. Staff developed the evaluation factors as a tool to be consistent during the review process. A summary of the evaluation factors is presented below. However, not all of the evaluation factors can be considered for all the analytes because the nature of the analyte may not be fully applicable.

Evaluation Factors

1. Did the Coalition implement actions according to its Management Plan?
2. Does the analyte fall under a High Priority Management Plan Site?
3. What is the date of most recent exceedance?
4. Have there been any detects observed during the two year period with no exceedances?
5. What year did the last sampling event take place?
6. What year will monitoring resume?
7. Do we have a sufficient amount of sampling results?
8. Is the analyte currently being applied to a crop within the site subwatershed?
9. Is the site within the Legal Delta?
10. Is the analyte on the 303(d) list for that waterbody?
11. Is the analyte part of a TMDL?
12. Is the analyte a Group A organochlorine pesticide and by default no longer applied?
13. Have management practices been implemented?
14. Can the analyte likely be remedied or addressed by a Management Plan?

A. Duck Creek at Hwy. 4

The Coalition proposes to remove diazinon, pH, and *Selenastrum capricornutum* toxicity testing, from the Duck Creek at Hwy. 4 Management Plan. Based on the evaluation factors, staff's findings support the Coalition's request to remove diazinon, pH, and *Selenastrum capricornutum* toxicity from its Duck Creek at Hwy. 4 Management Plan. Each evaluation factor is summarized below for Duck Creek at Hwy. 4.

A.1 Evaluation Factors Concerning Diazinon

1. As the Management Plan required, the Coalition contacted growers identified as having greatest likelihood of contributing to exceedances, conducted meetings, and individual surveys.
2. This is a High Priority Site under a Management Plan since 2008.
3. The most recent exceedance was observed in 2007.
4. Between 2007 and 2011, no diazinon exceedances and one detection have been observed in 30 tests.
5. The last sampling event occurred in 2011.
6. The Coalition will resume monthly monitoring in 2012, as part of its monthly Assessment monitoring. If more than two exceedances are observed within the next three years, the Coalition will roll diazinon back into a Management Plan.
7. A sufficient number of sampling results have been collected - 30 between years 2007 and 2011.
8. The rate of pesticide use has decreased from 566 pounds in 2007 to 295 pounds in 2010 - this is the most recent use information available today.
9. Duck Creek at Hwy. 4 is not within the Legal Delta
10. Diazinon is not on the 303(d) list for this waterbody.
11. Duck Creek at Hwy. 4 is not part of the San Joaquin River chlorpyrifos and diazinon TMDL.

12. Diazinon is not a Group A organochlorine. Diazinon is currently applied to crops.
13. According to the Coalition's management practice follow up surveys, growers have implemented management practices.
14. The Management Plan successfully managed diazinon.

The Coalition provided sufficient information and reasonable justification for staff to conclude that the Management Plan for diazinon is complete. Monitoring results reported between 2007 and 2011 reported no exceedances and one detection below the trigger limit in 2009. Staff recommends that diazinon at Duck Creek at Hwy. 4 should be removed from the Management Plan.

A.2 Evaluation Factors Concerning pH

1. As the Management Plan required, the Coalition contacted growers identified as having greatest likelihood of contributing to exceedances, conducted meetings, and individual surveys.
2. This is a High Priority Site under a Management Plan, although the analyte itself is not a high priority.
3. The most recent exceedance was observed in 2008.
4. Between 2008 and 2011, 39 sampling events have taken place and no pH exceedances have been observed.
5. The last sampling event occurred in 2011.
6. The Coalition will continue to collect pH data in 2012, as part of its monthly Assessment monitoring. If more than two exceedances are observed within the next three years, the Coalition will roll pH back into a Management Plan
7. A sufficient number of sampling results have been collected - 39 between years 2008 and 2011.
8. This evaluation factor does not apply.
9. Duck Creek at Hwy. 4 is not within the Legal Delta
10. pH is not on the 303(d) list for this waterbody.
11. Duck Creek at Hwy. 4 is not part of the San Joaquin River chlorpyrifos and diazinon TMDL.
12. pH is not a Group A organochlorine. pH is not applied to crops.
13. According to the Coalition's management practice follow up surveys, growers have implemented management practices.
14. According to the MRP Order, "At the request of the Coalition Group or upon recommendation by Regional Water Board staff, the Executive Officer may provide authorization to exempt a Coalition Group from the development of a Management Plan if the Executive Officer determines that the exceedance is not likely to be remedied or addressed by a Management Plan." (MRP Order No. R5-2008-0005, page 25).

The Coalition provided sufficient information and reasonable justification for staff to conclude that the Management Plan for pH is complete. The Coalition will continue to collect pH field data from Duck Creek during its normal monitoring schedule, but should discontinue reporting the analyte in its Management Plan.

A.3 Evaluation Factors Concerning *Selenastrum capricornutum* toxicity

1. As the Management Plan required, the Coalition contacted growers identified as having greatest likelihood of contributing to exceedances, conducted meetings, and individual surveys.
2. This is a High Priority Site under a Management Plan, although the analyte itself is not a high priority because sampling results indicate that there have been no herbicidal

exceedances or detections to account for any of the algal toxicity results. Duck Creek at Hwy 4 does not have any Management Plans for herbicides that could cause toxicity. Metals could have been a source of algal toxicity for the most recent toxic event in 2008, but TIEs were inconclusive.

3. The most recent exceedance occurred in 2008.
4. Between 2008 and 2011, 20 sampling events have taken place.
5. The last sampling event occurred in 2011.
6. The Coalition will resume monthly monitoring in 2012, as part of its monthly Assessment monitoring. If more than two exceedances are observed within the next three years, the Coalition will roll *Selenastrum capricornutum* back into a Management Plan.
7. A sufficient number of sampling results have been collected - 20 between years 2008 and 2011.
8. Herbicides are applied to crops in this subwatershed and there has been an absence of any herbicidal exceedances.
9. This evaluation factor does not apply.
10. *Selenastrum capricornutum* is not on the 303(d) list for this waterbody.
11. This evaluation factor does not apply.
12. *Selenastrum capricornutum* is not a Group A organochlorine.
13. The growers have implemented management practices according to the Coalition's follow up surveys and participated in personal meetings with the Coalition.
14. The Management Plan successfully managed *Selenastrum capricornutum*.

The Coalition provided sufficient information and reasonable justification for staff to conclude that the Management Plan for *Selenastrum capricornutum* is complete. The primary rationale is that there has been an absence of algal and herbicidal exceedances over 20 sampling events and algae Assessment sampling will resume in 2012.

B. French Camp Slough at Airport Way

The Coalition proposes to remove dieldrin from the French Camp Slough at Airport Way Management Plan. Based on the evaluation factors, staff's findings support the Coalition's request to remove dieldrin from the Management Plan. Each evaluation factor is summarized below for French Camp Slough at Airport Way.

B.1 Evaluation Factors Concerning Dieldrin

1. As the Management Plan required, the Coalition contacted growers identified as having greatest likelihood of contributing to exceedances, conducted meetings, and individual surveys.
2. This is a High Priority Site under a Management Plan since 2008 that required the Coalition to contact growers identified as having greatest likelihood of contributing to exceedances.
3. The most recent exceedance occurred in 2008.
4. Since 2008, 29 sampling events have taken place through 2011 with no exceedances or detections. Only two dieldrin exceedances have been observed at this site since monitoring began in 2006.
5. The last sampling event occurred in 2011.
6. The Coalition will resume monthly monitoring in 2014, as part of its monthly Assessment monitoring.
7. A sufficient number of sampling results have been collected - 29 between years 2008 and 2011.

8. Dieldrin (banned from agricultural use since 1985) is a hydrophobic Group A organochlorine pesticide suggesting that sediment control management practices implemented will prevent discharge from agriculture fields.
9. This evaluation factor does not apply.
10. Dieldrin is not on the 303(d) list for this waterbody.
11. This evaluation factor does not apply.
12. Dieldrin is a Group A organochlorine and no longer applied to crops.
13. According to the Coalition's follow up surveys, growers have implemented management practices that reduced their runoff and sediment discharges. The Coalition has been implementing this Management Plan since 2007. Management practices have also been implemented in High Priority watersheds upstream of French Camp Slough.
14. The Management Plan successfully managed dieldrin.

The Coalition provided sufficient information and reasonable justification for eliminating dieldrin from its Management Plan. The Coalition has documented reduced agriculture runoff which could reduce suspension of sediment and hydrophobic analytes like dieldrin. There were no reported exceedances or detections of dieldrin during monitoring conducted from 2008 to 2011. Further, dieldrin is no longer applied to crops. Between the years 2006 and 2011, only two detections were observed.

