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## Central Valley Regional Water Quality Control Board

9 January 2019

Mr. David De Groot  
Tule Basin Water Quality Coalition  
4866 E. Jenson  
Fresno, CA 93275

### **APPROVAL OF THE TULE BASIN WATER QUALITY COALITION SURFACE WATER PESTICIDE MONITORING PLAN**

Thank you for submitting the 2019 Pesticide Monitoring Proposal (Plan) for the Tule Basin Water Quality Coalition (Coalition). The proposed pesticides and schedule for surface water monitoring were identified based on guidance provided in the Pesticide Evaluation Protocol (PEP), as required by section III.B.2. of the Monitoring and Reporting Program (MRP) Attachment B to Order R5-2013-0120 *Waste Discharge Requirements General Order for Growers within the Tulare Lake Basin Area that are Members of a Third-party Group* (Order).

Staff determined that the Plan complies with the MRP requirements. Pesticides were identified using the approved PEP and the proposed monitoring schedule is consistent with the requirements of the Order.

Based on the attached staff memorandum, I approve the Pesticide Monitoring Plan for pesticide monitoring to be completed from 1 January 2019 through 31 December 2019. Please review the attached staff memo including the Staff Recommendations.

If you have any questions or comments regarding the review, or need any further information, please contact Yared Kebede at (916) 464-4828 or by email at [Yared.Kebede@waterboards.ca.gov](mailto:Yared.Kebede@waterboards.ca.gov)

Sincerely,

*Original signed by Adam Laputz*

Patrick Pulupa  
Executive Officer

Enclosure: Staff Review of Pesticide Monitoring Plan

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## Central Valley Regional Water Quality Control Board

TO: Susan Fregien  
Senior Environmental Scientist  
Irrigated Lands Regulatory Program

FROM: Yared Kebede  
Environmental Scientist  
Irrigated Lands Regulatory Program

DATE: 7 January 2019

SUBJECT: REVIEW OF THE TULE BASIN WATER QUALITY COALITION SURFACE  
WATER PESTICIDE MONITORING PLAN FOR 2019

The Central Valley Water Board received the Tule Basin Water Quality Coalition (Coalition) revised Pesticide Monitoring Proposal (Plan) on 3 January 2019. The Plan identifies the constituents and schedule for pesticide monitoring in surface water from 1 January 2019 through 31 December 2019.

Staff reviewed the Plan to determine compliance with requirements pursuant to section III.B.2. of the Monitoring and Reporting Program (MRP) Attachment B to Order R5-2013-0120 Waste Discharge Requirements General Order for Growers within the Tulare Lake Basin Area that are Members of a Third-party Group (Order), as well as the Pesticide Evaluation Protocol (PEP). Overall, the Plan meets the requirements of the Order, and staff recommends approval of the Plan. A summary of the main elements of the proposed monitoring plan is provided below.

### **Monitoring Sites, Parameters, and Schedule**

The constituents selected for monitoring (42 pesticides) were determined using three years of Pesticide Use Report (PUR) data (2014-2016), as required by the PEP. Pesticides that were not applied within the Coalition area were removed from consideration. Degradates were then added to the list of pesticides under consideration and pesticides with the same toxicant in water were grouped for evaluation of the aquatic life and human health risk ratios.

Pesticides applied within the sub-watershed were excluded from monitoring based on factors including environmental fate and transport properties such as high volatility, calculation of an aquatic life risk ratio of less than 50 or human health risk ratio of less than 10, and no commercially available analytical methods. No exclusions were made based on monitoring results.

**Staff Recommendations**

The Plan followed the steps outlined in the PEP and generally complies with requirements of the Order. Staff recommends approval of the Coalition's 2019 Pesticide Monitoring Proposal.

Staff recommends the following pesticides be removed from the monitoring schedule because exclusion is justified based on % pesticide use/aquatic life risk ratio:

- Bromacil (November, December, January, February)
- Carbaryl (October, April)
- Clothianidin (May, April)
- Dicamba (May, June, July)
- Tebuconazole (June, July)
- Thiamethoxam (August, September, October)