

Central Valley Regional Water Quality Control Board

22 January 2019

Mr. Tim Johnson
California Rice Commission
1231 I Street, Suite 205
Sacramento, CA 95814-2933

APPROVAL OF RICE PESTICIDES PROGRAM MANAGEMENT PRACTICES FOR 2019

Thank you for submitting the 2018 Rice Pesticides Program (RPP) Annual Monitoring Report (AMR) on 20 December 2018 and management practices recommendations for the 2019 thiobencarb monitoring season on 7 January 2019. The AMR and recommendations were submitted to meet the conditions of Resolution No. R5-2010-9001 (Resolution). The Central Valley Water Board staff review of the AMR is in the attached memorandum.

Thiobencarb monitoring during the 2018 season measured one detection above the thiobencarb performance goal of 1.5 parts per billion (ppb) during the 29 May event at Colusa Basin Drain 5 (CBD5). No detections of thiobencarb occurred at the municipal water intakes for the Cities of Sacramento and West Sacramento. Detections of thiobencarb in 2018 occurred at the lowest frequency since 2012.

Recommendations for the 2019 monitoring season include continuation of two actions supported in the 2018 season including:

- 1) Voluntary acreage reductions by the registrant (the company or individual applying to register a pesticide), who controls product availability, within the current manufacturing and distribution limitations; and
- 2) Department of Pesticide Regulation Enforcement Branch limitation of the liquid formulation of thiobencarb (Abolish 8EC) to ground only applications north of Highway 20 and west of the Sacramento River.

These actions are recommended for rice growers in the Sacramento Valley. Further, practices required by the Resolution and the 2018 approval letter continue to apply to these growers.

I approve the recommendations for the 2019 thiobencarb monitoring season. If there are any questions regarding this approval or the status of the Rice Pesticides Program, please contact Ashley Peters at Ashley.Peters@waterboards.ca.gov or (916) 464-4857.

Sincerely,

Original signed by

Patrick Pulupa, Executive Officer

cc: Roberta Firoved, California Rice Commission, Sacramento
RPP stakeholders (by email)

Central Valley Regional Water Quality Control Board

TO: Susan Fregien
Senior Environmental Scientist
IRRIGATED LANDS REGULATORY PROGRAM

FROM: Ashley Peters, P.E.
Water Resource Control Engineer
IRRIGATED LANDS REGULATORY PROGRAM

DATE: 15 January 2019

**SUBJECT: REVIEW OF THE RICE PESTICIDES PROGRAM 2018 ANNUAL
MONITORING REPORT AND 2019 MANAGEMENT PRACTICE
RECOMMENDATIONS**

On 9 November 2018, the California Rice Commission (CRC) submitted the 2018 Annual Monitoring Report (AMR) draft technical memorandum for the Rice Pesticides Program (RPP). Staff emailed the draft to stakeholders on 15 November for comments. On 20 December, the CRC submitted a revised AMR complete with the supporting laboratory and field documentation required by Resolution No. R5-2010-9001 (Resolution). Stakeholder comments were considered during the staff review of the AMR. The CRC submitted management practice recommendations for the 2019 thiobencarb use season on 7 January 2019.

In this memorandum, staff provides a brief summary of the monitoring activities conducted during 2018 and the CRC's recommendations for the 2019 season.

SUMMARY OF THE 2018 SEASON

The CRC monitored for thiobencarb at five sites (see Figure 1) from 26 April to 2 July 2018:

- Colusa Basin Drain 5 in the Colusa National Wildlife Refuge (CBD5);
- Colusa Basin Drain above Knights Landing (CBD1);
- Butte Slough at Lower Pass Road (BS1);
- Sacramento Slough Bridge near Karnak (SSB); and
- Sacramento River at Village Marina/Crawdads Cantina (SR1).

The Cities of Sacramento and West Sacramento monitored for thiobencarb at their water supply intakes from 18 April to 3 July 2018:

- City of Sacramento at Sacramento River Intake (SSR); and
- George Kristoff Water Treatment Plant Intake, previously called City of West Sacramento Intake at Bryte Bend, (WSR).

There were no detections of thiobencarb at the water intakes for the Cities of Sacramento and West Sacramento or at CRC's Sacramento River site.

CRC monitoring for thiobencarb in 2018 began later than usual due to a wet spring that delayed rice planting and herbicide application throughout most of the Sacramento Valley. However, the

KARL E. LONGLEY ScD, P.E., CHAIR | PATRICK PULUPA, ESQ., EXECUTIVE OFFICER

wet weather did not delay planting in Glenn County so sampling in 2018 was phased with site CBD5 sampled first on 26 April to capture the split start. Monitoring results for thiobencarb from all parties are shown in Table 1. During 2018, there was one detection above the thiobencarb performance goal of 1.5 parts per billion (ppb) at CBD5 (1.7 ppb [29 May]). Detections of thiobencarb in the agricultural drains occurred at the lowest rate in 2018 since 2012.

RECOMMENDATIONS FOR THE 2019 SEASON

The CRC does not propose any changes to the RPP for 2019. The CRC recommended two actions for the 2018 season in response to detections of thiobencarb above the performance goal in 2017 that they plan to support in 2019. These actions include the following:

- 1) Voluntary acreage reductions by the registrant (the company or individual applying to register a pesticide), who controls product availability, within the current manufacturing and distribution limitations; and
- 2) Department of Pesticide Regulation (DPR) Enforcement Branch limitation of the liquid formulation (Abolish 8EC) of thiobencarb to ground only applications north of Highway 20 and west of the Sacramento River.

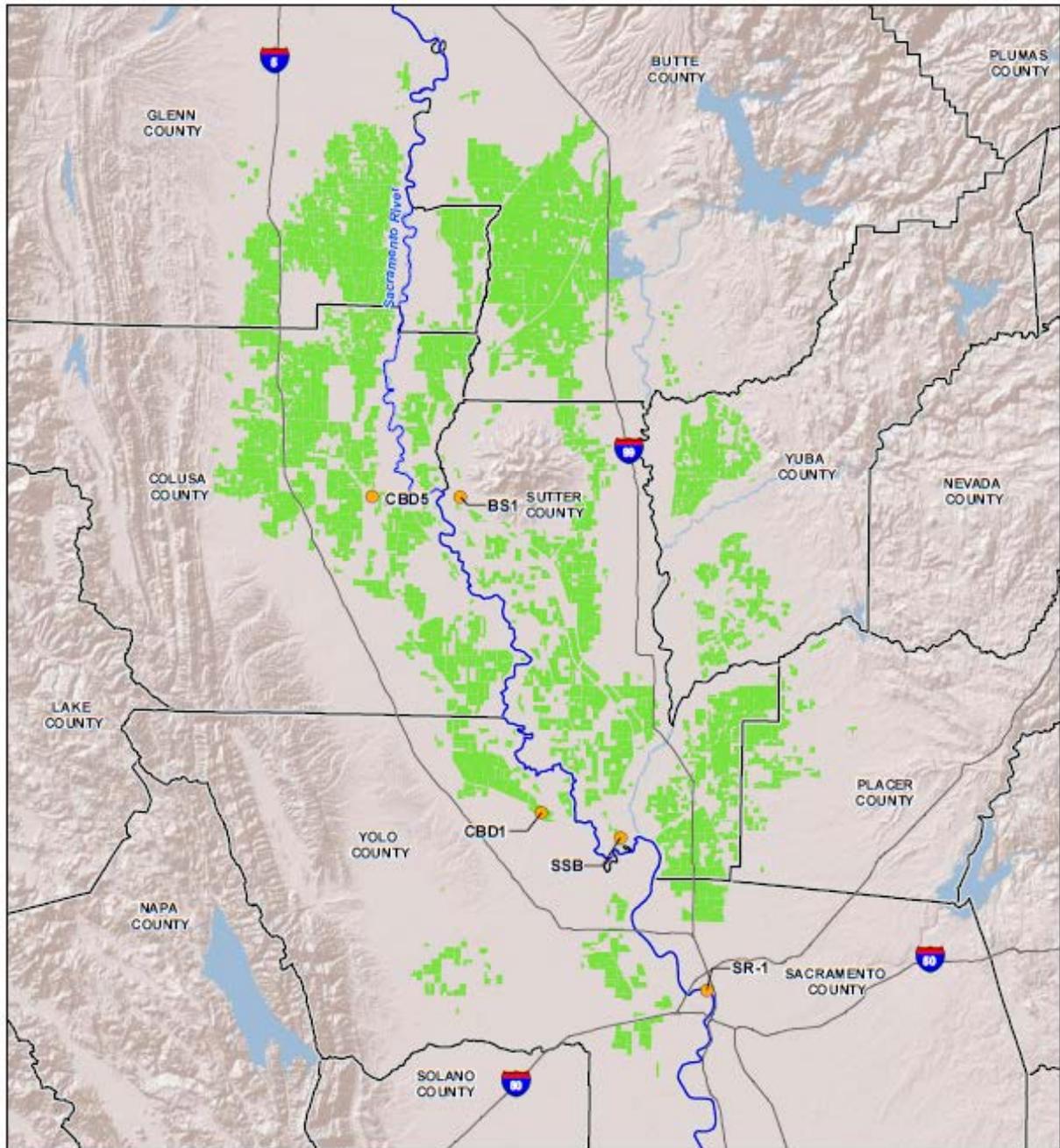
In addition to the recommendations outlined above, the CRC will continue to implement the following actions based on requirements of the Resolution and the 2018 approval letter:

- 1) Implement aggressive efforts to provide targeted outreach to industry and education to growers, Pest Control Advisors (PCAs), applicators, dealers, and distributors during the 2019 season. Examples of outreach include:
 - a. Continuation of mandatory thiobencarb stewardship meetings;
 - b. Support County Agricultural Commissioner (CAC) permit restrictions against individuals for repeated non-compliance;
 - c. Increase outreach with emphasis on counties where violations occur;
 - d. Maintain contact with growers, applicators, and PCAs; and
 - e. Continue funding to counties for off-hours surveillance inspections.
- 2) Continue the approved practices as outlined in the Resolution including:
 - a. Implementation of water quality monitoring and reporting consistent with the Resolution; and
 - b. Conduct stakeholder outreach activities including collaboration with the cities, DPR, CACs, and the Central Valley Water Board.

STAFF RECOMMENDATIONS

The 2018 AMR contained the information necessary to review and evaluate the program. Although the performance goal of 1.5 ppb in the rice drainages was exceeded during one sample event at site CBD5, the water quality objective at the Cities' water intakes was met with no detections of thiobencarb in the river. Staff recommends approval of the AMR and recommended management practices for 2019.

Figure 1: RPP Monitoring Sites (taken from RPP report)



LEGEND
● CITY
● RPP MONITORING SITES
□ COUNTY
■ RICE LAND 2017 PERMIT AREA

NOTES:
DATUM: NAD 1983.
SOURCES: BASEMAP (COPYRIGHT © 2014 ESRI); RICE LANDS (CAL A.G PERMIT, 2015); COUNTY (CAL FIRE 2007); HYDROLOGY (NHD ACCESSED JAN 2016).



FIGURE D-1
RPP Monitoring Sites
RPP Annual Monitoring Report
California Rice Commission

Table 1: RPP Thiobencarb (ppb) monitoring results for 2018 season.

Sampling Dates	CRC Monitoring					Cities Monitoring		
	CBD5	BS1	CBD1	SSB	SR1	WSR	SSR	Sacramento River at SSR Intake (percent)
4/18/18	-	-	-	-	-	ND	ND	87.5
4/25/18	-	-	-	-	-	ND	ND	70.9
4/26/18	ND	-	-	-	-	-	-	-
5/1/18	ND	ND	ND	ND	ND	-	-	-
5/2/18	-	-	-	-	-	ND	ND	77.0
5/8/18	0.47j	ND	ND	ND/ND (NCL/CLS)	ND	-	-	
5/9/18	-	-	-	-	-	ND	ND	79.6
5/10/18	-	-	-	-	-	ND	ND	88.1
5/15/18	0.73	ND	0.46j	ND	ND	ND	ND	87.3
5/16/18	-	-	-	-	-	ND	ND	87.3
5/17/18	-	-	-	-	-	ND	ND	75.0
5/22/18	ND	ND/ND (NCL/CLS)	1.3	ND	ND	ND	ND	86.2
5/23/18	-	-	-	-	-	ND	ND	78.5
5/24/18	1.4	0.18j	0.59	ND	ND	ND	ND	82.5
5/28/18	-	-	-	-	-	ND	ND	84.4
5/29/18	1.7	0.39j	1.4	ND	ND/ND (NCL/CLS)	ND	ND	74.8
5/30/18	-	-	-	-	-	ND	ND	87.5
5/31/18	1.3	0.30j	1.0	ND	ND	ND	ND	88.8
6/4/18	-	-	-	-	-	ND	ND	78.8
6/5/18	1.0	0.28j	0.81/ND (NCL/CLS)	ND	ND	ND	ND	90.8
6/6/18	-	-	-	-	-	ND	ND	86.8
6/7/18	0.79	0.23j	0.93	ND	ND	ND	ND	85.8
6/12/18	0.24j	ND	0.38j	ND	ND	-	-	-

Sampling Dates	CRC Monitoring					Cities Monitoring		
	CBD5	BS1	CBD1	SSB	SR1	WSR	SSR	Sacramento River at SSR Intake (percent)
6/13/18	-	-	-	-	-	ND	ND	87.0
6/14/18	0.25j	ND	0.27j	0.41j	ND	ND	ND	82.5
6/19/18	0.26j	ND	0.16j	ND	ND	-	-	-
6/20/18	-	-	-	-	-	ND	ND	85.5
6/21/18	-	-	-	-	-	ND	ND	88.6
6/26/18	0.23j	ND	0.18j	ND	ND	-	-	-
6/27/18	-	-	-	-	-	ND	ND	83.5
6/28/18	-	-	-	-	-	ND	ND	82.0
7/2/18	0.21j	ND	ND	ND	ND	-	-	-
7/3/18	-	-	-	-	-	ND	ND	74.2

NOTES:

- = not sampled

BOLD = exceedance of performance goal

CLS = California Laboratory Services lab

j = estimated value between method

detection and reporting limits

ND = not detected above lab reporting limits

ppb = parts per billion

NCL = North Coast Labs

SITES:

BS1 = Butter Slough at Lower Pass Road

CBD1 = Colusa Basin Drain (CBD) above Knights Landing

CBD5 = CBD5 in the Colusa National Wildlife Refuge

GC1 = Norman Road at Willow Creek

GC2 = Norman Road at Colusa Drain

SR1 = Sacramento River at Village Marina/Crawdads Cantina

SSB = Sacramento Slough Bridge near Karnak

SSR = City of Sacramento at Sacramento River Intake

WSR = George Kristoff Water Treatment Plant Intake