

From: Chris Jimmerson
To: Frank Wulff
Date: 12/20/2011 1:50 PM
Subject: Re: Monitoring schedules and TMDL compliance table

Thank you Frank,

I will spend some time investigating and get back to you about requirements for sampling cis-permethrin. There are some questions we have about how USGS derived .0033 ug/l as the narrative objective. For example, the literature you and I have looked at indicated .0033 is 1/10 of the LC50 for 24 hour - not the 96 hr that is referenced in the Basin Plan. I don't know why they used 24 hr versus 96 hour. In addition, monitoring in the water column for a what I believe to be a sediment bound compound is peculiar. I will look into that as well.

Are there any applications of this product these days that drain to Mustang Creek. Something to think about. The literature cites the last sampling event was in 2004.

Chris Jimmerson
Environmental Scientist
Irrigated Lands Regulatory Program
Central Valley Water Board
11020 Sun Center Drive, #200
Rancho Cordova, CA 95670
Phone 916-464-4859
Fax 916-464-4780
cjimmerson@waterboards.ca.gov

>>> Frank Wulff <fwulff@mlj-llc.com> 12/20/2011 12:36 PM >>>

Chris,

I read through the lines of evidence for the cis-permethrin at Mustang Creek, we are looking at the same document linked off the 303(d) list. The report does not say the USGS used 0.0033ug/L as a MDL, but they are stating that everything above that is toxic yet they could not use 38 of there samples because they could not get the quantification limits down to 0.0033ug/L so every time they had a detection and could quantification limits low enough it was toxic. It looks like they could not have a detection without exceeding the Evaluation Guideline of 0.0033ug/L because they could not detect down to any lower ug/L value.

We are unclear as to if we need to be sampling for this at this site. The site is not in assessment monitoring and the constituent is not in a USEPA approved TMDL, and we do not analyze for this constituent currently.

Frank

On Tue, Dec 20, 2011 at 10:55 AM, Chris Jimmerson <CJimmerson@waterboards.ca.gov> wrote:

thank you.

I am not able to find the reference of where you listed USGS MDL of .0033. The information i found through your link below indicates that the .0033 is 1/10th of LC50 for 24 Hr, midge. Can you please provide the link listing the MDL for USGS? Or a screen shot.

thank you

>>> Frank Wulff <fwulff@mlj-llc.com> 12/20/2011 10:21 AM >>>

Chris,

I am using the Final 2008 report

http://www.swrcb.ca.gov/rwgcb5/water_issues/tmdl/impaired_waters_list/final_2008_303d/table_of_contents.shtml#newlist

Let me know if you are able to get information some place else.

Cis-permethrin is a compound that we have not specifically analyzed for. We have analyzed for permethrin (not the specific isomers) in the past but do not currently analyze for them in the water column.

Thanks,

Frank

On Tue, Dec 20, 2011 at 9:58 AM, Chris Jimmerson <CJimmerson@waterboards.ca.gov> wrote:

Frank, before I reply to your question. Can you tell me if the 303(d) list you used is the 2010? I'm asking because your spreadsheet references 2008 303d. Maybe they are the same. Let me know.

Secondly, is cis-permethrin an compound the Coalition has analyzed before?

Thank you

Chris Jimmerson

Environmental Scientist

Irrigated Lands Regulatory Program

Central Valley Water Board

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Rancho Cordova, CA 95670
Phone 916-464-4859 (tel:916-464-4859)
Fax 916-464-4780 (tel:916-464-4780)
cjimmerson@waterboards.ca.gov

>>> Frank Wulff <fwulff@mlj-llc.com> 12/19/2011 2:57 PM >>>

Chris,

One more thing I would like to point out. Mustang Creek, Cis-permethrin on the bottom of the TMDL Table 11, we do not generally analyze for permethrins anymore except in sediment. Also it looks like the fact sheet said that USGS did the sampling and they used a MDL of 0.0033ug/L and the MDL we have in the database from the lab we use (APPL) is 0.009 ug/L with a reporting limit of 0.02 ug/L. I we are not sure what this means for our sampling requirements so let me know.

Thanks, Frank

On Mon, Dec 19, 2011 at 2:43 PM, Frank Wulff <fwulff@mlj-llc.com> wrote:

Hello Chris,

I have just finished up the 2012 monitoring schedules for the ESJWQC and SJCDWQC so I wanted to get them to you to go over before you took time off for the holiday season. I have also included the table we put together to show where we are sampling for TMDL compliance this year (Table 11). If you could go over both these documents and let us know if everything looks ok before we start sampling in 2012 that would be very helpful.

If you have any questions just let me or Melissa Turner know.

Thank you,

Frank

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Frank Wulff
Environmental Scientist
Michael L. Johnson LLC.
Ecosystems consulting
632 Cantrill Dr.
Davis, CA 95618

Phone(530)756-5200 (tel:%28530%29756-5200)
Fax (530)756-5225 (tel:%28530%29756-5225)
fwulff@mlj-llc.com
<http://www.mlj-llc.com> (<http://www.mlj-llc.com/>)

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Frank Wulff
Environmental Scientist
Michael L. Johnson LLC.
Ecosystems consulting
632 Cantrill Dr.
Davis, CA 95618

Phone(530)756-5200 (tel:%28530%29756-5200)
Fax (530)756-5225 (tel:%28530%29756-5225)
fwulff@mlj-llc.com
<http://www.mlj-llc.com> (<http://www.mlj-llc.com/>)

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Frank Wulff
Environmental Scientist
Michael L. Johnson LLC.
Ecosystems consulting
632 Cantrill Dr.

Davis, CA 95618

Phone(530)756-5200 (tel:%28530%29756-5200)

Fax (530)756-5225 (tel:%28530%29756-5225)

fwulff@mjl-llc.com

<http://www.mjl-llc.com> (<http://www.mjl-llc.com/>)

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Frank Wulff

Environmental Scientist

Michael L. Johnson LLC.

Ecosystems consulting

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Davis, CA 95618

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Fax (530)756-5225

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<http://www.mjl-llc.com> (<http://www.mjl-llc.com/>)