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3 August 2005

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ANNUAL MONITORING REPORT – SOUTHERN SAN JOAQUIN VALLEY WATER QUALITY COALITION- KAWEAH RIVER SUB-WATERSHED

On 1 April 2005, we received the Annual Monitoring Report (AMR) for the Southern San Joaquin Valley Water Quality Coalition's (SSJVWQC) Kaweah River Sub-watershed. This report was submitted by the SSJVWQC to meet the conditions of Resolution R5-2003-0105 and the associated Conditional Waiver of Waste Discharge Requirements for Discharges from Irrigated Lands (Conditional Waiver).

Water Board staff has reviewed the AMR to evaluate if the document accurately reflects the required reporting conditions detailed in the Conditional Waiver, the conditions set forth in the Kaweah River Sub-watershed's Monitoring and Reporting Program Plan (MRPP) deemed complete 7 September 2004, the Quality Assurance Project Plan (QAPP), and to assess the quality of the data generated and the conclusions and recommendations presented. Water Board staff finds that additional data/clarification is necessary to complete the AMR review.

By 30 September 2005, the Coalition need to address the requested information listed in 1 – 4 below.

1. Provide GPS coordinates for all monitoring sites (Item 1 of attached staff review).
2. Provide Fruit Growers Laboratories field data sheets for all sampling events as required by the Waiver Program (Item 2).
3. To the extent possible, provide original laboratory data sheets for toxicity tests preformed. If information is unavailable, request clarification regarding the survival of the control group for the Selenastrum for the 22 July 2004 sampling event (Item 9) and request copies of future laboratory data sheets to be included in next years AMR.
4. Provide clarification for the column titled "No. of Sections" on Table 2.2 (Summary of Pesticide Use) (Item 7).

The AMR review identified additional areas of concern that, although not required to make the AMR complete, are necessary for the Conditional Waiver program. **By 30 September 2005**, you need to address the requested information listed in 5-7 below.

5. Submit a revised sampling program that includes additional monitoring points including Mill Creek and Elbow Creek (when possible) to address the sampling of 20% of additional waterways per year as required by the Waiver program (Item 13).
6. Provide details on practical quantitation limits (PQL) for pesticide analysis obtainable from the contract laboratory (Item 10).
7. Provide a list of Coalition members so that we can evaluate the extent of coverage within the Sub-watershed. The revised Attachment B of Resolution No. 2003-0105 states, "The Coalition Group shall, by July 22, 2004, maintain a Membership Document with information concerning each Participant who has knowingly elected to be a member of the Coalition Group. The Membership Document shall include, at a minimum, a list of the Participants, information on contacting each Participant, and information sufficient to locate the fields or parcels of each Participant that are within the Coalition Group. The Regional Board may further specify the information to be included. This information shall be provided to the Regional Board upon request, within the time specified by the Regional Board, which time shall not exceed thirty days."

Items that need to be incorporated into the current monitoring program and/or generated for the next AMR submittal include:

- A) Complete chain of custody documentation (Item 3 of attached staff review);
- B) Prompt submittal of Communication Reports whenever water quality exceedance occur (Item 5);
- C) Completion of the detailed land use map (Item 6);
- D) Complete Table 2.2 of the AMR (Summary of Pesticide Use) (Item 7);
- E) Evaluation of data for monitoring point SP-3 to identify emerging trends (Item 8);
- F) Inclusion of glyphosate, simazine, diuron, paraquat, dishloride, and esfenvalerate in the pesticide analysis performed as part of Phase II monitoring program (Item 10);
- G) Collect and analyze toxicity QA/QC samples on the required 5% frequency (Item 10);
- H) Perform TIE analysis, resampling, sampling upstream, and preparation of a Communication Report when toxicity exceeds 50% mortality (Items 12 and 14);
- I) Continued work on management practices issues (Item 15).

If you have any questions or comments regarding the review, or need any further information, please contact Alan Cregan at (559) 445-6185.

Original Signed by

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Senior Engineer
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ARC:arc

cc: Mr. Tom Pinkos, Regional Water Quality Control Board, Rancho Cordova
Mr. Bill Croyle, Regional Water Quality Control Board, Rancho Cordova
Mr. Ken Landau, Regional Water Quality Control Board, Rancho Cordova
Mr. Dennis Westcot, Regional Water Quality Control Board, Rancho Cordova