



---

## Lahontan Regional Water Quality Control Board

April 30, 2020

Ramiro Avila  
471 N California Ave  
La Puente, CA 91744

**CERTIFIED MAIL  
RETURN RECEIPT REQUESTED  
7017 1450 0001 3058 9663**

### **REQUEST FOR COMMENTS - PROPOSED CLEANUP AND ABATEMENT ORDER – VICINITY OF 126TH STREET EAST AND NEARWOOD ROAD, PEARBLOSSOM, LOS ANGELES COUNTY, APN 3060-020-043**

### **WRITTEN COMMENTS DUE NO LATER THAN 5:00 P.M., JUNE 1, 2020**

Enclosed is a proposed Cleanup and Abatement Order R6V-2020-PROPOSED (Order) for the cleanup and abatement of discharges and threatened discharges of wastes associated with cannabis cultivation on Los Angeles County Assessor Parcel Number 3060-020-043 (the Site). The Site is located approximately 1,000 feet east of the intersection of 126th Street East and Nearwood Road. Cannabis cultivation activities conducted at the Site have discharged wastes and threaten future discharges of waste to the local groundwater basin and surface waters without authorization from applicable agencies, including the Regional Water Quality Control Board, Lahontan Region (Water Board).

Los Angeles County Assessor's Office records indicate that you, Ramiro Avila, are the owner of the parcel and are therefore the responsible party for unauthorized discharges that originate from the Site.

This Order requires you to investigate and clean up wastes at the Site through the following actions:

1. Submit a Mitigation Plan (Plan) by July 24, 2020.
2. Begin implementation of the Plan by August 31, 2020.
3. Complete all restoration and mitigation measures by January 15, 2021.
4. Submit a Site Closure Report upon completion of site restoration by February 15, 2021.
5. Submit email updates of the Site restoration by the 5<sup>th</sup> day of every month from the submission of the Plan until the approval of the Site Closure Report.
6. Upon approval of the Site Closure Report, complete an annual mitigation and monitoring program for the following five years.

PETER C. PUMPHREY, CHAIR | PATTY Z. KOUYOUMDJIAN, EXECUTIVE OFFICER

The Water Board is requesting your review and comments on the proposed CAO. Written comments must be received by the Water Board no later than **5:00 p.m. on June 1, 2020**. Written comments should include "Avila CAO Comments" in the subject line and be emailed to: [RB6enfpceed@waterboards.ca.gov](mailto:RB6enfpceed@waterboards.ca.gov).

If you do not have access to email, submit your written comments to:

Lahontan Regional Water Quality Control Board  
2501 Lake Tahoe Blvd  
South Lake Tahoe, CA 96150  
Attn: Avila CAO Comments

If you have any questions regarding this matter, please contact Eric Taxer, Senior Water Resource Control Engineer, at (530) 542-5434 ([Eric.Taxer@waterboards.ca.gov](mailto:Eric.Taxer@waterboards.ca.gov)), or me at (530) 542-5432 ([Scott.Ferguson@waterboards.ca.gov](mailto:Scott.Ferguson@waterboards.ca.gov)).



Scott C. Ferguson  
Supervising Water Resource Control Engineer

Enclosure: Cleanup and Abatement Order No. R6V-2020-PROPOSED

cc: Patty Z. Kouyoumdjian, Executive Officer, Lahontan Water Board  
Eric Taxer, Sr. WRCE, Lahontan Water Board  
Alex Spencer, Water Resource Control Engineer, Lahontan Water Board  
Elizabeth Beryt, Attorney III, State Water Board, Office of Chief Counsel  
Andrew Tauriainen, Attorney IV, State Water Board, Office of Enforcement  
Heather Jidkov, Attorney I, State Water Board, Office of Enforcement  
Kevin Porzio, Sr. WRCE, State Water Board, Division of Water Quality  
Dylan Seidner, Sr. WRCE, State Water Board, Office of Enforcement  
Taro Murano, Env. Program Manager, State Water Board, Division of Water Rights  
Tabatha Chavez, Supervising Special Investigator/CalCannabis, CDFW  
Noel Richards, Lieutenant, CDFW, Cannabis Enforcement Program  
Jeff Brandt, CDFW, Cannabis Enforcement Program  
Randy Rodriguez, Senior Environmental Scientist, CDFW, Cannabis Enforcement Program  
CDFW Region 6 Office, Cannabis Enforcement Program  
Arlene Anderson, Deputy District Attorney, Los Angeles County District Attorney's Office  
Robert Hawkins, Detective, Los Angeles County Sheriff's Department



---

## Lahontan Regional Water Quality Control Board

April 30, 2020

Interested Agencies and Parties

### **Request for Comments - Proposed Cleanup and Abatement Order Requiring Ramiro Avila to Cleanup and Abate the Discharge and Threatened Discharge of Sediment to Surface Waters of the Antelope Hydrologic Unit– Vicinity of 126th Street East and Nearwood Road, Pearblossom, Los Angeles County, APN 3060-020-043**

**Written comments due no later than 5:00 p.m., June 1, 2020**

The California Regional Water Quality Control Board, Lahontan Region (Water Board) intends to issue a Cleanup and Abatement Order (CAO) on or about June 5, 2020. The CAO names Ramiro Avila (Discharger), owner of the above-referenced parcel, as the responsible party for discharges of excavated sediment into two unnamed ephemeral surface waters for the purpose of outdoor cannabis cultivation. The discharges have resulted in violations of waste discharge prohibitions contained in the Water Board's Water Quality Control Plan for the Lahontan Region.

The proposed CAO requires the Discharger to submit and implement a mitigation plan to restore the site, prevent further discharges, provide updates on restoration work, and to monitor the site for five years following the completion of restoration.

The Water Board is requesting your review and comments upon the proposed CAO (enclosed). The proposed CAO can also be viewed at the Water Board's webpage at <http://www.waterboards.ca.gov/lahontan>

All comments regarding the proposed CAO must be received by the Water Board no later than **5:00 p.m. on June 1, 2020**. Written comments should include "Avila CAO Comments" in the subject line and be emailed to: [RB6enfproceed@waterboards.ca.gov](mailto:RB6enfproceed@waterboards.ca.gov)

For those who do not have access to email, submit your written comments to:

Lahontan Regional Water Quality Control Board  
2501 Lake Tahoe Blvd  
South Lake Tahoe, CA 96150  
Attn: Avila CAO Comments

---

PETER C. PUMPHREY, CHAIR | PATTY Z. KOUYOUMDJIAN, EXECUTIVE OFFICER

Please contact Eric Taxer at (530) 542-5434 ([Eric.Taxer@waterboards.ca.gov](mailto:Eric.Taxer@waterboards.ca.gov)), or me at (530) 542-5432 ([Scott.Ferguson@waterboards.ca.gov](mailto:Scott.Ferguson@waterboards.ca.gov)) if you have any questions regarding this matter.



Scott C. Ferguson  
Supervising Water Resource Control Engineer

Enclosure: Cleanup and Abatement Order No. R6V-2020-Proposed

cc: Patty Z. Kouyoumdjian, Executive Officer, Lahontan Water Board  
Eric Taxer, Sr. WRCE, Lahontan Water Board  
Emily Cushman, Engineering Geologist, Lahontan Water Board  
Elizabeth Beryt, Attorney III, State Water Board, Office of Chief Counsel  
Andrew Tauriainen, Attorney IV, State Water Board, Office of Enforcement  
Heather Jidkov, Attorney I, State Water Board, Office of Enforcement  
Kevin Porzio, Sr. WRCE, State Water Board, Division of Water Quality  
Dylan Seidner, Sr. WRCE, State Water Board, Office of Enforcement  
Taro Murano, Env. Program Manager, State Water Board, Division of Water Rights  
Tabatha Chavez, Supervising Special Investigator/CalCannabis, CDFW  
Noel Richards, Lieutenant, CDFW, Cannabis Enforcement Program  
Jeff Brandt, Cannabis, CDFW, Enforcement Program  
Randy Rodriguez, Sr. Environmental Scientist, CDFW Cannabis Enforcement Program  
CDFW Region 6 Office, Cannabis Enforcement Program  
Arlene Anderson, Deputy District Attorney, LA County District Attorney's Office  
Robert Hawkins, Detective, Los Angeles County Sheriff's Department

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LAHONTAN REGION  
CLEANUP AND ABATEMENT ORDER NO. R6V-2020-(PROPOSED)  
FOR  
RAMIRO VILLA AVILA  
LOS ANGELES COUNTY ASSESSOR PARCEL NO. 3036-020-043  
WDID NO. 6B191908004**

---

This Order is issued to Ramiro Villa Avila (hereinafter referred to as the Discharger) based on the provisions of Water Code section 13304, which authorizes the Lahontan Regional Water Quality Control Board (Lahontan Water Board or Regional Water Board) to issue an order requiring the cleanup and abatement of wastes, and Water Code section 13267, which authorizes the Lahontan Water Board to require the preparation and submittal of technical and monitoring reports.

**FINDINGS**

The Lahontan Water Board, with respect to the Discharger's acts, or failure to act, finds:

**Purpose and Scope**

1. This Order requires the Discharger to clean up and abate discharges and threatened discharges of soil, nutrient rich wastewaters, fertilizers, and pesticides associated with cannabis cultivation activities within the Antelope Valley groundwater basin and the Antelope Hydrologic Unit. These discharges and threatened discharges are a result of cannabis cultivation activities on Los Angeles County Assessor Parcel Number (APN) 3060-020-043 (the Site). The Site is located in the vicinity of Nearwood Road and 126<sup>th</sup> Street East (34.4367817833333, -117.90206535), south of Pearblossom, an unincorporated community of Los Angeles County. The activities conducted at the Site have previously discharged wastes and threaten future discharges of wastes to the local groundwater basin and to surface waters of the local hydrologic unit without authorization from applicable federal, state, and local agencies, including the Lahontan Water Board.
2. The investigation and cleanup required by this Order is to be in compliance with the Porter-Cologne Water Quality Control Act (Wat. Code §13000 et seq.), the Water Quality Control Plan for the Lahontan Region (Basin Plan), State Water Resources Control Board (State Water Board) Resolution No. 92-49 Policies and Procedures for Investigation and Cleanup and Abatement of Discharges under Water Code section 13304 (Resolution 92-49), and other applicable State and Regional Water Board plans, policies, and regulations.

## Site Specific Information

### Property Owner Liability

3. The Discharger owns the Site and is the responsible party for the purpose of complying with this Order. A search of the online real estate application LandVision indicates the Discharger purchased the parcel, identified as Los Angeles County APN 3060-020-043 (APN 3060-02-043), on November 16, 2018 and remains the current owner.

### Watershed Description

4. The Site is an approximately 10-acre parcel located on an alluvial fan on the north slope of the San Gabriel Mountains. The Site is within the Antelope Valley groundwater basin and contains surface waters that are part of the Antelope Hydrologic Unit. Two desert washes roughly 830-foot-long originate on the south portion of the Site, flow north, converge offsite, and then flow approximately 270 feet downstream to join an unnamed, ephemeral, National Hydrography Dataset (NHD) mapped stream. Approximately 3,400 feet downstream of this confluence, the unnamed NHD stream joins Pallett Creek, which ultimately joins the Big Rock Wash approximately 2.7 miles northeast of the Site.

### Enrollment Status

5. The State Water Board adopted General Waste Discharge Requirements and Waiver of Waste Discharge Requirements for Discharges of Waste Associated with Cannabis Cultivation Activities, Order No. WQ 2019-0001-DWQ<sup>1</sup> (General Order) on February 5, 2019. As of March 1, 2020, the Site does not have any approved or pending applications for cannabis cultivation under the State Water Board's General Order. Outdoor cannabis cultivation is banned in unincorporated areas of Los Angeles County.

### Chronology

6. On August 14, 2019, the Los Angeles County Sheriff's Department obtained a search warrant from the Superior Court of California, North Judicial District of Los Angeles County for APN 3060-020-043. The warrant authorized Lahontan Water Board staff to participate in the search to inspect for water quality violations related to cannabis cultivation.
7. On August 16, 2019, Lahontan Water Board staff conducted an inspection of the Site under the authority of the search warrant. The August 16, 2019 inspection report is included in Attachment 1 of this Order. During the inspection, Lahontan Water Board staff observed impacts to two surface water drainages, including the following: cannabis cultivation, improper storage of various chemical cultivation

---

<sup>1</sup> Available at:

[https://www.waterboards.ca.gov/board\\_decisions/adopted\\_orders/water\\_quality/2019/wqo2019\\_0001\\_dwq.pdf](https://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2019/wqo2019_0001_dwq.pdf)

supplies, large-scale grading, discharge of sediment, and the disposal of trash and human waste.

- a. The natural grade of two drainages on the Site was altered by cutting the drainage banks and filling the drainage channels with an estimated 229,703 gallons of native soil. In these drainages, native vegetation was removed and two hoop houses were constructed to facilitate cannabis cultivation.
  - b. Cannabis was being grown directly in the ground that had been dug and filled with potting soil. Young cannabis plants were present within a western hoop house. The plants in an eastern hoop house had been harvested. Lahontan Water Board staff collected a soil sample of the potting soil in the western hoop house and detected concentrations of pesticides (hexachlorobenzene, dicofol, dichlorvos, demeton, demeton-methyl, diazinon, and disulfoton). The August 16, 2019 Site soil sample analytical results are included in this Order as Attachment 2.
  - c. Cultivation-related waste was located throughout the Site including containers of fertilizers, pesticides, and growth media that were stored directly on the ground without secondary containment.
8. On October 21, 2019, Lahontan Water Board staff issued the Discharger a Notice of Violation (NOV) for unauthorized discharges related to cannabis cultivation and unpermitted grading within two surface water drainages. The NOV is included as Attachment 1 to this Order.
  9. On October 29, 2019, Raquel Villa signed the United States Postal Service certified mail tracking receipt for the Notice of Violation (NOV) addressed to the Discharger. Lahontan Water Board staff performed an online search that identified Raquel Villa [Torres] as the Discharger's relative.
  10. On January 24, 2020 the Discharger called staff and left a voicemail indicating knowledge of the issued NOV, referencing the Site by APN, and left a contact phone number.
  11. On March 6, 2020 Lahontan Water Board staff returned the Discharger's call and left the Discharger a voicemail message. As of April 27, 2020, Lahontan Water Board staff has not received a response from the Discharger.
  12. To date, Lahontan Water Board staff have not received any indication that the Discharger has taken corrective action to restore the disturbed drainages or to prevent further discharges to waters of the state.

## **Regulatory Authority**

### **Definitions**

13. "Waste" includes sewage and any and all other waste substances, liquid, solid, gaseous, or radioactive, associated with human habitation, or of human or animal

origin, or from any producing, manufacturing, or processing operation, including waste placed within containers of whatever nature prior to, and for the purpose of, disposal, as defined by Water Code section 13050, subdivision (d).

14. "Waters of the state" are any surface or groundwater, including saline waters, within the boundaries of the state, as defined by Water Code section 13050, subdivision (e).
15. "Pollution" is an alteration of the quality of the waters of the state by waste to a degree which unreasonably affects the waters for beneficial uses or facilities which serve such beneficial uses, as defined by Water Code section 13050, subdivision (l)(1).

### **Basin Plan Requirements**

16. The Basin Plan designates beneficial uses, establishes water quality objectives, contains implementation programs for achieving objectives, and incorporates by reference plans and policies adopted by the State Water Board. The Site is located within the Antelope Hydrologic Unit and the Antelope Valley groundwater basin identified in the Basin Plan.
  - a. The designated beneficial uses for minor surface waters of the Antelope Hydrologic Unit include:
    - Municipal and Domestic Supply (MUN)
    - Agricultural Supply (AGR)
    - Freshwater Replenishment (FRSH)
    - Ground Water Recharge (GWR)
    - Wildlife Habitat (WILD)
  - b. The designated beneficial uses for the Antelope Valley groundwater basin include:
    - Municipal and Domestic Supply (MUN)
    - Agricultural Supply (AGR)
    - Freshwater Replenishment (FRSH)
    - Industrial Service Supply (IND)
17. The Basin Plan contains, under the authority of Water Code section 13243, enforceable waste discharge prohibitions that apply to the entire Lahontan Region. The Basin Plan is available at:  
[https://www.waterboards.ca.gov/lahontan/water\\_issues/programs/basin\\_plan/](https://www.waterboards.ca.gov/lahontan/water_issues/programs/basin_plan/)  
Chapter 4 of the Basin Plan contains applicable waste discharge prohibitions.
  - a. Prohibition 3 forbids the discharge of waste that could affect the quality of waters of the state that is not authorized by the State Water Board or the Lahontan Water Board through waste discharge requirements or other appropriate regulatory mechanism.
  - b. Prohibition 4 forbids the discharge of solid waste into surface waters of the Lahontan Region.



18. The State Water Board has adopted Resolution No. 92-49, which is included in Appendix B of the Basin Plan. Resolution No. 92-49 sets forth the policies and procedures to be used during an investigation and cleanup of a polluted site and requires that cleanup levels be consistent with State Water Board Resolution No. 68-16, the Statement of Policy with Respect to Maintaining High Quality Waters in California (Resolution No. 68-16). Resolution No. 92-49 requires waste to be cleaned up in a manner that promotes attainment of either background water quality, or the best water quality which is reasonable if background levels of water quality cannot be restored. Any alternative cleanup level to background must: (1) be consistent with the maximum benefit to the people of the state; (2) not unreasonably affect present and anticipated beneficial use of such water; and (3) not result in water quality less than that prescribed in the Basin Plan and applicable Water Quality Control Plans and Policies of the State Water Board. Resolution No. 92-49 directs that investigations proceed in a progressive sequence. To the extent practical, it directs the State and Regional Water Boards to require and review for adequacy written work plans for each element and phase, and the written reports that describe the results of each phase of the investigation and cleanup.

#### **Unauthorized Discharge of Waste**

19. The drainages above, on, and downstream of the Site are surface waters within the boundaries of the state, and are waters of the state, as defined in Finding No. 14, above.
20. The groundwater upgradient, beneath, and downgradient of the Site is located within the boundaries of the state; and are waters of the state, as defined by Finding No. 14, above.
21. The discharge of earthen material to fill the Site's drainages, and the discharge of human waste, fertilizers, pesticides, and trash into the Site's drainages as described in Finding No. 7, above, and documented in Lahontan Water Board staff's inspection report (Attachment 1), constitute discharges of waste to waters of the state.
22. Chemical use and improper chemical storage at the Site have the potential to result in a discharge of waste to the Site's drainages and underlying groundwater, and constitute a threatened discharge of waste to waters of the state. The chemicals use and improper chemical storage at the Site also have the ability to affect the quality of waters of the state to a degree that can adversely affect the beneficial uses of the waters. These conditions constitute an ongoing condition of threatened pollution, as defined in Finding No. 15, above.

#### **Violations**

23. The discharge of the wastes to waters of the state described in Finding Nos. 7 and 21, above, and documented in Lahontan Water Board staff's inspection report (Attachment 1) has the ability to affect the quality of waters of the state at and downstream of the Site. A review of Lahontan Water Board and State Water Board

records do not contain any documentation that the Discharger obtained authorization from either the Lahontan Water Board or State Water Board to discharge these wastes to waters of the state. Such unauthorized discharges of waste to waters of the state violate the Basin Plan waste discharge prohibitions described in Finding Nos. 17.a. and 17.b., above.

**Water Code section 13304 and Enforcement Policy**

24. Water Code section 13304 subdivision (a) states:

Any person who has discharged or discharges waste into waters of this state in violation of any waste discharge requirements or other order or prohibition issued by a regional board or the state board, or who has caused or permitted, causes or permits, or threatens to cause or permit any waste to be discharged or deposited where it is, or probably will be, discharged into the waters of the state and causes, or threatens to create, a condition of pollution or nuisance, shall upon order of the regional board clean up the waste or abate the effects of the waste, or, in the case of threatened pollution or nuisance, take other necessary remedial action, including, but not limited to, overseeing cleanup and abatement efforts... Upon failure of any person to comply with the cleanup or abatement order, the Attorney General, at the request of the board, shall petition the superior court for that county for the issuance of an injunction requiring the person to comply with the order. In the suit, the court shall have jurisdiction to grant a prohibitory or mandatory injunction, either preliminary or permanent, as the facts may warrant.

25. The Discharger has discharged wastes to waters of the state in violation of Basin Plan waste discharge prohibitions issued by the Lahontan Water Board, and in doing so, has also created a condition of threatened pollution, as discussed in Finding Nos. 22 and 23, above. Such waste discharges and creation of a condition of threatened pollution satisfy the criteria under which the Lahontan Water Board is authorized to issue a Cleanup and Abatement Order to the Discharger, pursuant to Water Code section 13304.

26. Cleanup and abatement activities are necessary to mitigate the impacts of the unauthorized waste discharges to surface waters; to eliminate threatened discharges of wastes to surface waters and the groundwater; to restore water quality to natural background; and to restore adversely affected beneficial uses. The current condition of threatened pollution also poses an immediate and substantial threat to beneficial uses and has the potential to individually or cumulatively cause significant detrimental impacts to human health and the environment. The issuance of a cleanup and abatement order pursuant to Water Code section 13304 is appropriate and consistent with policies of the Lahontan Water Board.

### **Water Code section 13267 Technical Reports**

27. Water Code section 13267, subdivision (a) provides that the Lahontan Water Board may investigate the quality of any water of the state within its region in connection with any action relating to the Basin Plan. Water Code section 13267, subdivision (b), provides that the Lahontan Water Board, in conducting an investigation, may require a discharger to furnish, under penalty of perjury, technical or monitoring program reports that the Lahontan Water Board requires, provided that the burden of the reports bears a reasonable relationship to the need for the reports and the benefits to be obtained. The technical reports required by this Order are necessary to ensure compliance with the cleanup directives set forth in this Order intended to restore water quality and beneficial uses to pre-discharge conditions. The technical reports are further necessary to demonstrate that appropriate methods will be used to cleanup waste discharged to surface waters and to restore compliance with the state's water quality protection laws and regulations (e.g., Water Code, Basin Plan waste discharge prohibitions).

The burden of preparing these reports is reasonably related to these needs and benefits in accordance with Water Code section 13267, subdivision (b). The findings in this Order provide the Discharger with a written explanation regarding the need for remedial action and technical reports, and identifies the evidence supporting the requirements to implement cleanup and abatement activities and submit technical reports. The Discharger named in this Order owns and/or operates the Site from which waste was discharged and on which there exists a continuing threat of future waste discharges, and thus is appropriately named as a party responsible for providing the technical reports.

### **California Environmental Quality Act**

28. Issuance of this Order is an enforcement action taken by a regulatory agency to enforce the regulatory provisions of the laws and regulations administered by the Lahontan Water Board, and is therefore exempt from the provisions of the California Environmental Quality Act (CEQA)(Pub. Resources Code, § 21000 et seq.) in accordance with California Code of Regulations, title 14, section 15321. This action may also be considered exempt because it is an action by a regulatory agency for the protection of natural resources (California Code of Regulations, title 14, section 15307) and an action by a regulatory agency for the protection of the environment (California Code of Regulations, title 14, section 15308).

## **ORDERS**

**IT IS HEREBY ORDERED** that, pursuant to Water Code sections 13267 and 13304, the Discharger shall cleanup the wastes and abate the impacts to water quality in accordance with the scope and schedule set forth below and provide the following information:

## Time Scheduled Requirements

1. By **July 24, 2020**, submit a Mitigation Plan (Plan) to the Lahontan Water Board for review. The Plan shall include, at a minimum:
  - a. A schedule and details for the removal of trash, human waste, all potting soil (above and in-ground), hoop houses, irrigation equipment, drip lines, fertilizers, pesticides, and other cultivation-related waste.
  - b. Detail of the methods to be used for Site restoration, including how waste soils will be removed from the drainage channels, and how long-term impacts from Site erosion will be abated (e.g. re-grading, establishing permanent ground cover, etc.). The proposed mitigation shall describe actions necessary to restore beneficial uses designated in the Basin Plan and compensate for current adverse impacts to beneficial uses.
    - i) The Plan shall identify methods that incorporate the use of plant species native to the Site in any revegetation efforts. Disturbed areas shall be re-established to a uniform vegetative cover equivalent to 70 percent of the pre-disturbance vegetative conditions. All plantings shall be irrigated until established and able to survive without irrigation. Include a planting plan, plant list, and irrigation plan.
    - ii) California Stormwater Quality Association ([www.CASQA.org](http://www.CASQA.org)) best management practices shall be applied to all construction activities on the Site. All applicable permits shall be obtained for any Site restoration work, which may include, but is not limited to, county grading permits, State Water Board NPDES Construction Stormwater Permit, and Clean Water Act section 401/404 permits.
  - c. The Plan shall include an implementation schedule which establishes project milestones with consideration for obtaining applicable permits (local, state, and federal), seasonal restrictions on grading and planting, and meeting the deadlines stipulated in this Order.
  - d. A five-year mitigation monitoring plan that:
    - i) Identifies how vegetative monitoring data will be used to evaluate successful revegetation and habitat restoration of disturbed areas. The plan shall include the identification of an undisturbed area for use as a background reference site. The reference site shall be representative of the impacted stream channels prior to the discharge.
    - ii) Identifies a monitoring schedule, transects, photo points, and/or applies other methods that will be used to evaluate the success of revegetation and riparian habitat restoration efforts against reference site conditions.

- iii) Includes a maintenance schedule and measures to address any erosion and plant stress/mortality following the Plan implementation.
  - iv) Identifies interim annual success criteria to achieve a native vegetative cover that is at least 70 percent of pre-disturbance vegetative conditions based upon the background reference site conditions. Adaptive management strategies shall be identified to be implemented when annual interim success criteria are not achieved.
2. By **August 31, 2020**, upon concurrence by the Lahontan Water Board Executive Officer, the Discharger shall begin implementing the Plan.
  3. By **January 15, 2021**, complete all restoration and mitigation measures described in the approved Plan.
  4. By **February 15, 2021**, submit a Site Restoration Report to the Lahontan Water Board that demonstrates that the approved Plan has been implemented. This report must also contain a schematic showing as-built conditions, copies of waste manifests and hauling/disposal receipts (as applicable), and provide baseline vegetative monitoring data of all revegetated areas.
  5. By the **5<sup>th</sup> day of every month** following the issuance of this Order and until the Site Restoration Report is received and approved by the Lahontan Water Board Executive Officer, submit progress updates on Requirements 1 through 4, above, by email to the Lahontan Water Board email address identified in Requirement 16, below. The progress updates shall include the status of any required permits, a description and photographs of work that has been completed since the prior progress update, and the anticipated work schedule for the two months following the progress update.
  6. By **February 1, 2022**, submit the results of the Year 1 mitigation monitoring.
  7. By **February 1, 2023**, submit the results of the Year 2 mitigation monitoring.
  8. By **February 1, 2024**, submit the results of the Year 3 mitigation monitoring.
  9. By **February 1, 2025**, submit the results of the Year 4 mitigation monitoring.
  10. By **February 1, 2026**, submit the results of the Year 5 mitigation monitoring.
  11. At the discretion of Lahontan Water Board Executive Officer, annual mitigation monitoring and reporting may be discontinued if the Discharger demonstrates that the restored channels have been stabilized and native vegetation has been reestablished in disturbed areas at a rate of 70 percent of pre-disturbance conditions and is self-sustaining.

## **General Requirements and Notices**

### **Duty to Use Qualified Professionals**

12. All technical reports required herein that involve planning, investigation, evaluation, design, or other work requiring interpretation and proper application of engineering or geologic sciences, shall be prepared by or under the direction of persons registered to practice in California pursuant to California Business and Professions Code, sections 6735, 7835, and 7835.1. As required by these laws, completed technical reports must bear the signature(s) and seal(s) of the registered professional(s) in a manner such that all work can be clearly attributed to the professional responsible for the work.

### **Signatory Requirements**

13. All technical reports submitted by the Discharger shall include a cover letter signed by the Discharger, or a duly authorized representative, certifying under penalty of law that the signer has examined and is familiar with the report and that to their knowledge, the report is true, complete, and accurate. The Discharger shall also state if they agree with any recommendations/proposals and whether they approve implementation of said proposals. Any person signing a document submitted under this Order shall make the following certification:

"I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my knowledge and on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment."

### **Notice of Onsite Work**

14. The Discharger or their authorized agent(s) shall notify Lahontan Water Board staff at least 48 hours prior to any onsite work, testing, or sampling that pertains to environmental remediation and investigation and is not routine monitoring, maintenance, or inspection, or that has not been fully described in the Plan.

### **Notice of Change in Ownership or Occupancy**

15. The Discharger shall file a written report on any changes in the Site's ownership or occupancy. This report shall be filed with the Lahontan Water Board no later than 30 days prior to a planned change and shall reference the number of this Order.

### **Submissions**

16. All monitoring reports, technical reports, or notices required under this Order shall be emailed to [Lahontan@waterboards.ca.gov](mailto:Lahontan@waterboards.ca.gov) with "Avila CAO No. R6V-2020-(Proposed)" in the subject line.

### **Other Regulatory Requirements**

17. The Discharger shall obtain all applicable local, state, and federal permits necessary to fulfill the requirements of this Order prior to beginning the work. For example, California Fish and Game Code section 1602 requires a person or entity to notify California Department of Fish and Wildlife before changing the bed, channel, or bank of a river, stream, or lake.

### **Cost Recovery**

18. Pursuant to Water Code section 13304, the Lahontan Water Board is entitled to, and may seek reimbursement for, all reasonable costs it actually incurs investigating and abating the effects of the unauthorized discharges of waste and to oversee/supervise the cleanup of such waste, or other remedial action, required by this Order. The Discharger shall enroll in the State Water Board's Cost Recovery Program and shall reimburse the State of California for all reasonable costs actually incurred by the Lahontan Water Board.

### **Delayed Compliance**

19. If for any reason, the Discharger is unable to perform any activity or submit any document in compliance with the schedule set forth herein, or in compliance with any work schedule submitted pursuant to this Order and approved by the Executive Officer, the Discharger may request, in writing, an extension of the time specified. The extension request shall include justification for the delay. Any extension request shall be submitted as soon as a potential delay is recognized and prior to the compliance date. An extension may be granted by revision of this Order or by a letter from the Executive Officer. The Lahontan Water Board acknowledges that local, state, and federal permits may cause a delay beyond the control of the Discharger and will take all the available relevant facts into consideration when considering whether to grant an extension request.

### **Potential Liability for Failure to Comply**

20. If, in the opinion of the Executive Officer, the Discharger fails to comply with the provisions of this Order, the Executive Officer or other delegated officer may refer or recommend that the Lahontan Water Board refer this matter to the Attorney General for judicial enforcement, may issue a complaint for administrative civil liability, or may take other enforcement actions. Failure to comply with this Order may result in the assessment of administrative civil liability of up to \$1,000, \$5,000, or \$10,000 per violation, per day, depending on the violation, pursuant to the Water Code, including sections 13268, 13350, and 13385. The Lahontan Water Board reserves its right to take any enforcement actions authorized by law.

### **No Limitation of Water Board Authority**

21. This Order in no way limits the authority of the Lahontan Water Board to take any enforcement actions authorized by law.

**Modifications**

22. Any modification to this Order shall be in writing and approved by the Executive Officer.

**Requesting Review by the State Water Board**

23. Any person aggrieved by this action may petition the State Water Board to review the action in accordance with Water Code section 13320 and California Code of Regulations, title 23, sections 2050 and following. The State Water Board must receive the petition by 5:00 p.m., 30 days after the date of this Order, except that if the thirtieth day following the date of this Order falls on a Saturday, Sunday, or state holiday, the petition must be received by the State Water Board by 5:00 p.m. on the next business day. Copies of the law and regulations applicable to filing petitions may be found on the internet at: [http://www.waterboards.ca.gov/public\\_notices/petitions/water\\_quality](http://www.waterboards.ca.gov/public_notices/petitions/water_quality) or will be provided upon request.

This Order is issued under authority delegated to the Executive Officer by the Lahontan Water Board and is effective upon the date of signature.

Ordered by: \_\_\_\_\_ Date: \_\_\_\_\_  
PATTY Z. KOUYOUMDJIAN  
EXECUTIVE OFFICER

- Attachments:
1. October 21, 2019 Notice of Violation with August 16, 2019 Inspection Report, APN 3060-020-043, Los Angeles County
  2. August 16, 2019 Soil Sample Results, APN 3060-020-043, LA County
  3. Water Code section 13267 Fact Sheet





# Inspection Brief

## Eastern California Cannabis Unit

2501 Lake Tahoe Blvd, South Lake Tahoe, CA 96150 | (530) 542-5400

### Site Information

Landowner (Source LandVision 8/19/2019)			
Name	Avila, Ramiro Villa	Address	471 N California Ave La Puente, CA 91744
Site/Facility			
Name	D2 Site1 - 3060-020-043	Address	VIC 126 STE Nearwood Road Pearblossom, CA 93553
Site County	Los Angeles	Site APN	3060-020-043
Permitting Status	At the time of the inspection the Site was not enrolled in the Cannabis Cultivation General Order (Order WQ 2019-001-DWQ) and cannabis cultivation is not permitted in unincorporated portions of Los Angeles County.		
WDID	Unpermitted		

### Site Location

<small>USDA, FSA   Los Angeles County Office of the Assessor   Esri, HERE, Garmin, iPC   Powered by Esri</small>				
Latitude	34.4363911087094		Longitude	-117.902011191191

## Inspection Information

Inspection Date	Aug 16, 2019	Start	0916	End	1140
Warrant/Consent	Warrant				
<b>Personnel</b>					
Inspection Conducted By	Alex Spencer, WRCE, Eastern California Cannabis Unit, Lahontan Regional Water Quality Control Board Emily Cushman, EG, Eastern California Cannabis Unit, Lahontan Regional Water Quality Control Board Eric Taxer, SWRCE, Eastern California Cannabis Unit, Lahontan Regional Water Quality Control Board Casey Yearout, WRCE, Office of Enforcement, State Water Board				
Accompanied By	Arlene Anderson, Los Angeles County District Attorney Los Angeles County Sheriff Office, Palmdale Station (multiple personnel, lead Detective Rob Hawkins) California Department of Fish and Wildlife (multiple personnel) United States Drug Enforcement Administration (multiple personnel)				

### Purpose

Evaluate unpermitted cannabis cultivation site for potential water quality violations.

### Background

State and Regional Water Resources Control Board (Water Board) staff participated in an inspection at the location identified above (Site) to document actual and/or threatened water quality impacts for potential California Water Code (Water Code) violations. The inspection was conducted under search warrant as part of coordinated efforts led by the Los Angeles County Sheriff's Office (Sheriff), California Department of Fish and Wildlife (CDFW), and other agencies as noted above.

### Inspection Observations

Sheriff's Department personnel entered and cleared the Site of any suspects prior to Water Board staff arrival. Water Board staff entered the Site at 0916 hours and observed two roughly parallel drainages on the Site, each had been graded and contained a large hoop house. The upgradient portion of each drainage began on the southern portion of the Site and dipped north. Earth work had been done in each drainage to create a wide, flat space along the length of the drainages where two relatively similar sized sets of hoop houses had been constructed; the western hoop house contained live cannabis plants growing directly in the ground. The eastern hoop house was not being cultivated at the time of the inspection. A motorhome was present at the Site, located on a dirt area between the two drainages. Water Board staff identified 17 key features; these are identified by Feature Identification (FID) numbers in this report. Feature Identification numbers correspond to our online collection system dataset.

We observed a drip irrigation system which connected to each hoop house; a large water tank was located on the upgradient (southern) portion of the Site. A smaller chemical mixing tank located on the ridge above the hoop houses was surrounded by chemical and fertilizer containers; the tank appeared to be for mixing chemicals and fertilizers into the irrigation system (Photos 6, 20, 21 & FID: 39 and 40). We were notified by Sheriff personnel that an irrigation line was located downgradient of the eastern cultivation area leaving the Site (FID: 46); this irrigation water was being used to grow more cannabis plants in two distinct areas within the drainage below the eastern cultivation area on APN 3060-020-058. Water Board staff did not have warrant access to APN

3060-020-058, but Detective Hawkins told us that additional cannabis plants had been planted in the drainage area.

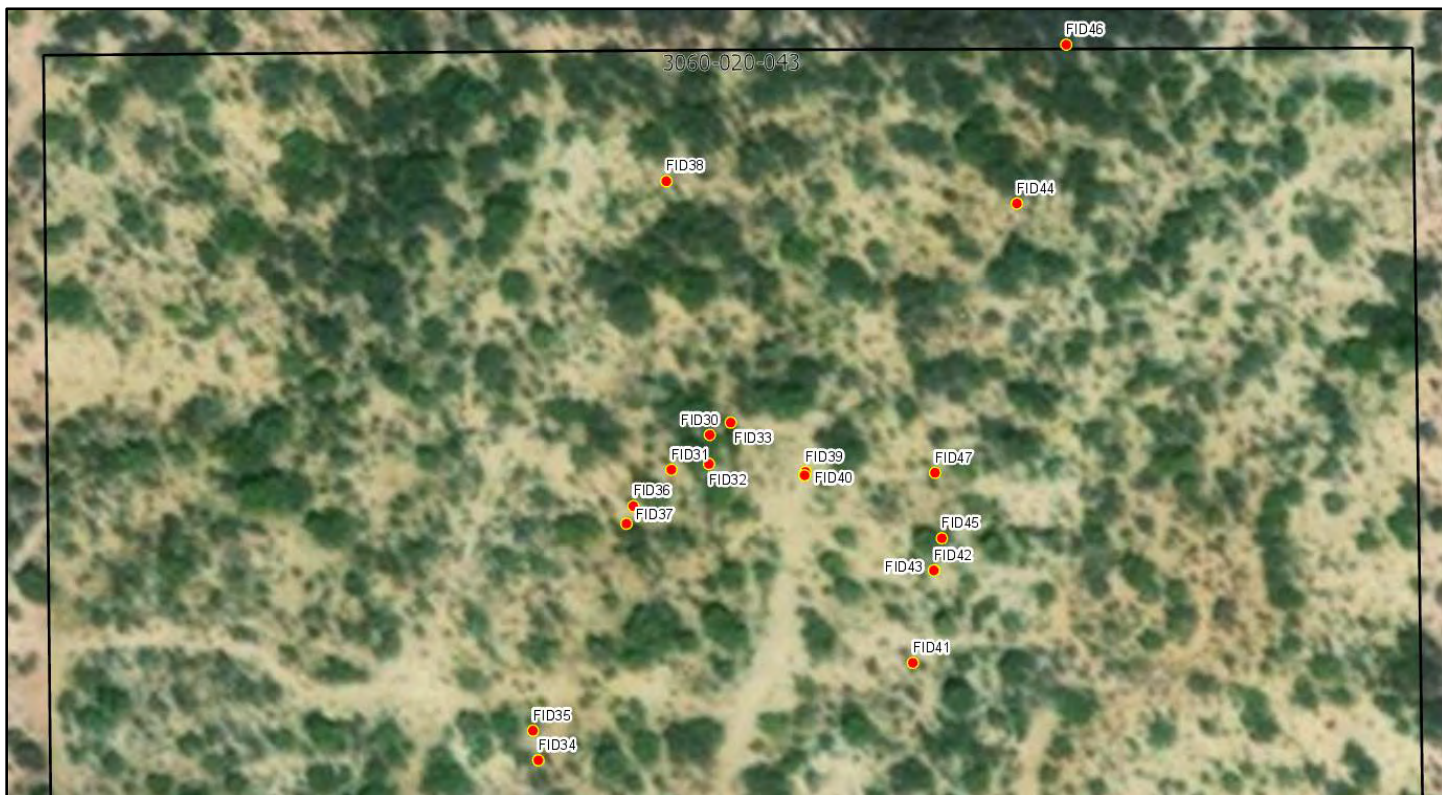
Emily Cushman used a Nikon Forestry Pro IEC60825 to measure the dimensions of each hoop house. The western hoop house measured approximately 75-feet wide and 130-feet long, and the eastern hoop house measured approximately 75-feet wide by 145-feet long. Alex Spencer used Garmin GLO 190-01492-90-0C in conjunction with a Microsoft SurfacePro model 1796 to collect the FIDs.

Emily Cushman collected soil samples at FID: 33 for laboratory analysis of pesticides by EPA Method 8081B and 8141 (sample numbers: 19RB6CANN006 and 19RB6CANN007). Laboratory results have not been received at the time of this report.

The upgradient portions of each drainage were used as bathrooms (FID: 34 and 41). Disturbances in the upper portion of the western drainage ("Length 1 west") consisted mostly of fill to create an access road. In the eastern drainage disturbances to the upper portion of the drainage did not involve road building but were still notable ("Length 1 east").

Soil disturbances associated with grading for the western and eastern hoop houses were significant ("Length 2 west" and "Length 2 east") and involved cutting into the banks of the drainages and filling the natural channels to create approximately 77-foot wide and 80-foot wide flat areas for cultivation in the west and east channels, respectively. We estimate that the ravine walls outside the central portion of the channel were cut an average of 7 feet above the final grade. In the each of the drainages stockpiles of soil spoils were located above (FID: 31 and 44) and below each hoop house (FID: 38 and 42) that were not secured to prevent runoff or run-on during a storm event. Cultivation related waste was observed in each drainage (FID: 32 and 43) and on the ridge between the hoop houses (FID: 39) including partially full and empty containers of fertilizer and other chemicals; all containers were stored uncovered and without secondary containment, in a manner not protective of wildlife or the environment.

The inspection was completed at 1140 hours.



## Analysis

<b>Key Features</b>	
<b>FID: 30 - Active cannabis cultivation area (west)</b>	Associated Photo Numbers: 1, 2, 3, 4, 5, 7, 10
Description: Western hoop houses with cannabis plants growing in the ground. A drip irrigation system was being used. The cultivation area was located entirely within the graded ravine. The hoop house measured approximately 130-feet long by 75-feet wide. The base of the hoop house was bare soil which had been graded to be relatively flat. We estimated that each drainage had been cut to an average depth of approximately 7-feet above final grade.	
Water Quality Violation: Yes	
Applicable Water Code: 13260 – Cultivator is not enrolled in the Water Board’s Cannabis Cultivation General Order WQ 2019-0001-DWQ	
Latitude: 34.4367817833333	Longitude: -117.90206535
<b>FID: 31 - Excavated spoils pile</b>	Associated Photo Numbers: 8, 14
Description: This soil spoils pile measured 0.0181 acres, averaged approximately 5 feet in height, and was located on the eastern side of the channel from this point extending upgradient (south) to FID: 36 (Photo 14).	
Water Quality Violation: Under Assessment	
Applicable Water Code: Under Assessment	
Latitude: 34.4367264166667	Longitude: -117.902126433333

<b>FID: 32 - Cultivation related waste</b>	Associated Photo Numbers: 9
Description: Trash pile of cultivation related waste: fertilizer containers, potting soil, and drink containers. This waste was stored without containment, in a manner not protective of wildlife or the environment.	
Water Quality Violation: Under Assessment	
Applicable Water Code: Under Assessment	
Latitude: 34.43673565	Longitude: -117.902066633333
<b>FID: 33 - Soil sampling location</b>	Associated Photo Numbers: none
Description: Soil sampling location. Emily Cushman collected two soil samples from the base of a cannabis plant within the western hoop house. The samples contained blue granular material like what is pictured in Photo 7. The soil samples were submitted for laboratory analysis of pesticides using US EPA Methods 8081B and 8141.	
Water Quality Violation: Under Assessment	
Applicable Water Code: Under Assessment	
Latitude: 34.4368014333333	Longitude: -117.902032033333
<b>FID: 34 - Outdoor bathroom area (west)</b>	Associated Photo Numbers: 11, 12
Description: Toilet paper and solid human waste present within the natural drainage upgradient of this point in the western drainage.	
Water Quality Violation: Under Assessment	
Applicable Water Code: Under Assessment	
Latitude: 34.4362646	Longitude: -117.902338183333
<b>FID: 35 - Start of graded/filled channel - Length 1 west</b>	Associated Photo Numbers: 12, 13
Description: The natural bed of the channel at this point was measured as approximately 3-ft wide (Photo 12). This point is the most upgradient portion of the grading in the western channel and extends 130 feet downgradient to FID: 36. The bed of the channel along "Length 1 west" was filled and graded to a width of approximately 15 feet to create a road to access the western hoop house (Photo 13).	
Water Quality Violation: Under Assessment	
Applicable Water Code: Under Assessment	
Latitude: 34.4363117333333	Longitude: -117.90234675
<b>FID: 36 - End of graded/filled channel - Length 1 west</b>	Associated Photo Numbers: 14
Description: The downgradient end of "Length 1 west" (FID: 35 to 36). See more information in FID: 35 description. The spoils pile (FID: 31) begins at this point and continues north.	
Water Quality Violation: Under Assessment	
Applicable Water Code: Under Assessment	
Latitude: 34.43666855	Longitude: -117.902186933333

<b>FID: 37 - Start of cut/filled channel - Length 2 west</b>	Associated Photo Numbers: 13, 14
Description: The most upgradient point "Length 2 west" (FID: 37 to 38). The channel along "Length 2 west" has been cut and filled with soil to create a flat space to construct a hoop house to cultivate cannabis (Photo 14). The ravine walls on each side of the central portion of the channel were cut and filled to width of approximately 52 feet at this point.	
Water Quality Violation: Under Assessment	
Applicable Water Code: Under Assessment	
Latitude: 34.4366406333333	Longitude: -117.902197883333
<b>FID: 38 - End of cut/filled channel - Length 2 west</b>	Associated Photo Numbers: 15, 16, 17
Description: Most downgradient point of disturbance in the western channel and the end of "Length 2 west" (FID: 37 to 38). This point is the bottom of the western hoop house and 215 feet south (downstream) of FID: 37. The ravine walls on each side of the central portion of the channel were cut and filled to a width of approximately 77-feet wide at this point. We estimated that the walls of the ravine had been cut to an average depth of approximately 7-feet above final grade to fill the central portion of the channel.	
Water Quality Violation: Under Assessment	
Applicable Water Code: Under Assessment	
Latitude: 34.437185	Longitude: -117.90213445
<b>FID: 39 - Stored fertilizer and chemicals near mixing tank</b>	Associated Photo Numbers: 20, 21
Description: Chemicals were stored around a tank (FID: 40) which did not have secondary containment and was part of the irrigation system. These chemicals were stored in a manner not protective of wildlife or the environment. This tank appears to be where chemicals and fertilizer were added into the irrigation system.	
Water Quality Violation: Under Assessment	
Applicable Water Code: Under Assessment	
Latitude: 34.4367228333333	Longitude: -117.901912933333
<b>FID: 40 – Fertilizer and chemical mixing tank</b>	Associated Photo Numbers: 6,20,21
Description: This tank is part of the irrigation system and appears to be where chemicals and fertilizer were mixed into the irrigation system. Chemicals and fertilizers were stored adjacent to this tank (FID: 39).	
Water Quality Violation: Under Assessment	
Applicable Water Code: Under Assessment	
Latitude: 34.4367175	Longitude: -117.901914416667
<b>FID: 41 - Start of graded/filled channel - Length 1 east</b>	Associated Photo Numbers: 22, 23
Description: FID: 41 is the most upgradient point of disturbance in the eastern channel and the start of "Length 1 east" which is 55-feet long (FID: 41 to 41). The natural channel above this point was measured as 6-feet wide and 6-inches deep. The riparian zone/banks of the channel along "Length 1 east" had been disturbed but not cut. The area south (upgradient) of this point was being used as an outdoor bathroom; toilet paper and solid human waste were present (Photo 22).	
Water Quality Violation: Under Assessment	
Applicable Water Code: Under Assessment	
Latitude: 34.4364195	Longitude: -117.901742016667

<b>FID: 42 - End of graded/filled channel - Length 1 east</b>	Associated Photo Numbers: 24
Description: FID: 42 is the most downgradient point of "Length 1 east" (FID: 41 to 42). See FID: 41 description for more details.	
Water Quality Violation: Under Assessment	
Applicable Water Code: Under Assessment	
Latitude: 34.4365667833333	Longitude: -117.901707766667
<b>FID: 43 - Start of cut/filled channel - Length 2 east</b>	Associated Photo Numbers: 24
Description: This point is the most upgradient portion of excavation in the eastern channel. The natural channel above this point was measured as approximately 6-feet wide. "Length 2 east" is 220-ft long and extends from FID: 43 to 44. At this point the ravine walls had been cut and filled to a width of approximately 40-feet. Starting at FID: 47 the ravine walls had been cut and filled to a width of approximately 80-ft, and the central portion of the channel had been cut and filled to create a flat cultivation area. At this point cultivation related waste was dumped without containment.	
Water Quality Violation: Under Assessment	
Applicable Water Code: Under Assessment	
Latitude: 34.4365664	Longitude: -117.901708566667
<b>FID: 44 - End of cut/filled channel - Length 2 east with spoils pile</b>	Associated Photo Numbers: 25
Description: FID: 44 is the most downgradient point of "Length 2 east" and the bottom of the eastern hoop house. The soils spoils pile was 80-ft wide at this point as measured across the drainage.	
Water Quality Violation: Under Assessment	
Applicable Water Code: Under Assessment	
Latitude: 34.4371495833333	Longitude: -117.901576583333
<b>FID: 45 - Excavated spoils pile upgradient of eastern cultivation area</b>	Associated Photo Numbers: 24
Description: Soil spoils pile measured as 39-feet long, 5-feet wide, average 4-feet in height. The spoil pile was in the eastern drainage, south (upgradient) of the hoop house. The pile length was measured perpendicular to the drainage.	
Water Quality Violation: Under Assessment	
Applicable Water Code: Under Assessment	
Latitude: 34.4366174833333	Longitude: -117.901695966667
<b>FID: 46 - Irrigation line to off-Site cultivation areas</b>	Associated Photo Numbers: none
Description: An irrigation line was discovered by Sheriff's Department staff leaving the eastern cultivation area north (downgradient) to additional, off-Site cultivation areas on the adjacent parcel to the north.	
Water Quality Violation: Under Assessment	
Applicable Water Code: Under Assessment	
Latitude: 34.437402	Longitude: -117.901498

<b>FID: 47 – Eastern hoop house</b>	Associated Photo Numbers: 18, 19, 25
Description: FID: 47 is the most upgradient extent of eastern hoop house. While no active cultivation was occurring in this hoop house at the time of the inspection, a drip irrigation system was in place and plants had been cultivated in the ground within the hoop house. The ravine walls at this location had been cut and filled to create an 80-foot wide level cultivation area. The hoop house dimension were approximately 145-feet long and 75-ft wide.	
Water Quality Violation: Under Assessment	
Applicable Water Code: Under Assessment	
Latitude: 34.43672165	Longitude: -117.901706883333

## Photo Log


	Photo Number: Photo 1
	08/16/2019 9:12 AM
	Latitude: 34.4365816666667
	Longitude: -117.901925
	Photographer: Eric Taxer Direction: Northwest
	Camera: NIKON CORPORATION COOLPIX W300
	Description: (Filename: DSCN0300_96831.JPG) Western hoop house/cultivation area (FID: 30)





Photo Number: Photo 2
08/16/2019 9:13 AM
Latitude: 34.4366733333333
Longitude: -117.902
Photographer: Eric Taxer Direction: West-northwest
Camera: NIKON CORPORATION COOLPIX W300
Description: (Filename: DSCN0304_96831.JPG) Western hoop house/cultivation area (FID: 30)



Photo Number: Photo 3
08/16/2019 9:17 AM
Latitude: 34.4367616666667
Longitude: -117.902096666667
Photographer: Eric Taxer Direction: North
Camera: NIKON CORPORATION COOLPIX W300
Description: (Filename: DSCN0312_96831.JPG) Interior of western hoop house/cultivation area (FID: 30)



Photo Number: Photo 4
08/16/2019 9:17 AM
Latitude: 34.43676
Longitude: -117.902091666667
Photographer: Eric Taxer Direction: Northeast
Camera: NIKON CORPORATION COOLPIX W300
Description: (Filename: DSCN0313_96831.JPG) Interior of western hoop house/cultivation area (FID: 30)



Photo Number: Photo 5
08/16/2019 9:16 AM
Latitude: 34.43675
Longitude: -117.90212
Photographer: Eric Taxer Direction East-northeast
Camera: NIKON CORPORATION COOLPIX W300
Description: (Filename: DSCN0308_96831.JPG) Western hoop house/cultivation area (FID: 30)



Photo Number: Photo 6
08/16/2019 9:19 AM
Latitude: 34.436755
Longitude: -117.901971666667
Photographer: Eric Taxer Direction: Southeast
Camera: NIKON CORPORATION COOLPIX W300
Description: (Filename: DSCN0319_96831.JPG) Fertilizer and chemical mixing tank (FID: 40) as seen from western hoop house



Photo Number: Photo 7
08/16/2019 9:19 AM
Latitude: 34.43678833333333
Longitude: -117.901985
Photographer: Eric Taxer Direction: not applicable
Camera: NIKON CORPORATION COOLPIX W300
Description: (Filename: DSCN0321_96831.JPG) Cannabis plant with drip irrigation and fertilizer in western hoop house



Photo Number: Photo 8
08/16/2019 9:20 AM
Latitude: 34.4367666666667
Longitude: -117.902055
Photographer: Eric Taxer Direction: South
Camera: NIKON CORPORATION COOLPIX W300
Description: (Filename: DSCN0322_96831.JPG) Spoils pile upgradient of western cultivation area (FID: 31)



Photo Number: Photo 9
08/16/2019 9:20 AM
Latitude: 34.4367183333333
Longitude: -117.902061666667
Photographer: Eric Taxer Direction: not applicable
Camera: NIKON CORPORATION COOLPIX W300
Description: (Filename: DSCN0323_96831.JPG) Cultivation related waste in western channel (FID: 32)



Photo Number: Photo 10

08/16/2019 9:22 AM

Latitude:  
34.4368283333333

Longitude:  
-117.902048333333

Photographer: Eric Taxer  
Direction: not applicable

Camera: NIKON  
CORPORATION  
COOLPIX W300

Description: (Filename:  
DSCN0325\_96831.JPG)  
Improperly stored fertilizer  
in western hoop house



Photo Number: Photo 11

08/16/2019 9:37 AM

Latitude: 34.43623

Longitude:  
-117.902313333333

Photographer: Eric Taxer  
Direction: South

Camera: NIKON  
CORPORATION  
COOLPIX W300

Description: (Filename  
DSCN0328\_96831.JPG)  
Outdoor bathroom area  
and waste in western  
drainage (FID: 34)



Photo Number: Photo 12  
08/16/2019 9:38 AM  
Latitude: 34.436235  
Longitude: -117.902318333333  
Photographer: Eric Taxer  
Direction: South  
Camera: NIKON CORPORATION COOLPIX W300  
Description: (Filename: DSCN0329\_96831.JPG) Western channel upgradient of FID: 35 and bathroom waste



Photo Number: Photo 13  
08/16/2019 9:47 AM  
Latitude: 34.4362933333333  
Longitude: -117.902325  
Photographer: Eric Taxer  
Direction: North  
Camera: NIKON CORPORATION COOLPIX W300  
Description: (Filename: DSCN0332\_96831.JPG) Filled drainage and cut riparian zone for road upgradient of western cultivation area (FID: 35)



Photo Number: Photo 14

08/16/2019 9:48 AM

Latitude:  
34.4366616666667

Longitude:  
-117.902181666667

Photographer: Eric Taxer  
Direction: North

Camera: NIKON  
CORPORATION  
COOLPIX W300

Description: (Filename:  
DSCN0334\_96831.JPG)  
End of access road and  
transition to cultivation  
area in western drainage.  
The upgradient portion of  
the spoils pile (FID: 31) is  
pictured in the right of the  
photo



Photo Number: Photo 15

08/16/2019 9:58 AM

Latitude: 34.437185

Longitude:  
-117.902086666667

Photographer: Eric Taxer  
Direction: North-northwest

Camera: NIKON  
CORPORATION  
COOLPIX W300

Description: (Filename:  
DSCN0336\_96831.JPG)  
Spoils pile downgradient  
of western cultivation area  
(FID: 38)



Photo Number: Photo 16
08/16/2019 9:58 AM
Latitude: 34.4371816666667
Longitude: -117.902075
Photographer: Eric Taxer Direction: North
Camera: NIKON CORPORATION COOLPIX W300
Description: (Filename: DSCN0337_96831.JPG) Spoils pile downgradient of western cultivation area (FID: 38)



Photo Number: Photo 17
08/16/2019 9:58 AM
Latitude: 34.4371883333333
Longitude: -117.902065
Photographer: Eric Taxer Direction: North-northeast
Camera: NIKON CORPORATION COOLPIX W300
Description: (Filename: DSCN0338_96831.JPG) Spoils pile downgradient of western cultivation area (FID: 38)





Photo Number: Photo 18
08/16/2019 10:03 AM
Latitude: 34.4365766666667
Longitude: -117.90187
Photographer: Eric Taxer Direction: Northeast
Camera: NIKON CORPORATION COOLPIX W300
Description: (Filename: DSCN0341_96831.JPG) Eastern cultivation area (FID: 47)



Photo Number: Photo 19
08/16/2019 10:15 AM
Latitude: 34.4371883333333
Longitude: -117.9015366666667
Photographer: Eric Taxer Direction: Northeast
Camera: NIKON CORPORATION COOLPIX W300
Description: (Filename: DSCN0349_96831.JPG) Eastern cultivation area (FID: 47)



Photo Number: Photo 20
08/16/2019 10:04 AM
Latitude: 34.43674
Longitude: -117.90171
Photographer: Eric Taxer Direction: Northwest
Camera: NIKON CORPORATION COOLPIX W300
Description: (Filename: DSCN0342_96831.JPG) Chemical mixing tank and cultivation related waste (FID: 39 and 40)



Photo Number: Photo 21
08/16/2019 10:04 AM
Latitude: 34.436715
Longitude: -117.901921666667
Photographer: Eric Taxer Direction: North
Camera: NIKON CORPORATION COOLPIX W300
Description: (Filename: DSCN0343_96831.JPG) Chemical mixing tank and cultivation related waste (FID: 39 and 40)



Photo Number: Photo 22
08/16/2019 10:06 AM
Latitude: 34.4364266666667
Longitude: -117.901745
Photographer: Eric Taxer Direction: South
Camera: NIKON CORPORATION COOLPIX W300
Description: (Filename: DSCN0346_96831.JPG) Outdoor bathroom area with paper and solid human waste above the eastern hoop house (FID: 41)



Photo Number: Photo 23
08/16/2019 10:09 AM
Latitude: 34.4364416666667
Longitude: -117.901721666667
Photographer: Eric Taxer Direction: Southeast
Camera: NIKON CORPORATION COOLPIX W300
Description: (Filename: DSCN0347_96831.JPG) Start of filled and disturbed eastern channel, "Length 1 east" (FID: 41)



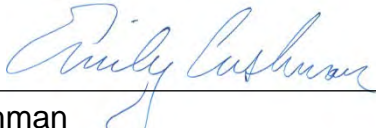
Photo Number: Photo 24
08/16/2019 10:10 AM
Latitude: 34.4366033333333
Longitude: -117.901621666667
Photographer: Eric Taxer Direction: West-northwest
Camera: NIKON CORPORATION COOLPIX W300
Description: (Filename: DSCN0348_96831.JPG) Spoil and trash pile upgradient of eastern cultivation area. End of "Length 1 east" (FID: 42 and 43), beginning of "Length 2 east"




Photo Number: Photo 25
08/16/2019 10:18 AM
Latitude: 34.4371083333333
Longitude: -117.901771666667
Photographer: Eric Taxer Direction: East-northeast
Camera: NIKON CORPORATION COOLPIX W300
Description: (Filename: DSCN0352_96831.JPG) Spoils pile downgradient of eastern cultivation area (FID: 44)

## Preparation and Review

**Prepared by:**

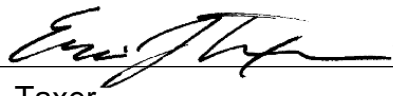
  
\_\_\_\_\_  
Emily Cushman  
Engineering Geologist

August 27, 2019  
Date

  
\_\_\_\_\_  
Alex Spencer  
Water Resource Control Engineer

August 27, 2019  
Date

**Reviewed by:**

  
\_\_\_\_\_  
Eric J. Taxer  
Senior Water Resource Control Engineer

August 27, 2019  
Date

October 09, 2019

## Analytical Report

**Client:** **Water Board**  
1001 I Street  
Sacramento, CA 95814

**Attn:** **Emily Cushman**

**Work Order #:** 1908101  
**Project:** RWB6\_General\_2019  
**Project #:** [none]  
**P.O. Number:**  
**Project Received:** August 20, 2019 9:58  
**Project Reported:** October 9, 2019 14:17

Sincerely,

*Timea Majoros*

Timea Majoros, Ph.D.  
Laboratory Director / President



**WORK ORDER: 1908101**
**COC Number:**
**Water Board**

 1001 I Street  
 Sacramento, CA 95814

**Project:** RWB6\_General\_2019

**PO Number:**
**Project Manager:** Emily Cushman

**Project #:** [none]

### Sample Summary

Lab ID	Sample	Matrix	Date Sampled	Date Received
1908101-01	19RB6CANN001	Sediment	August 15, 2019 11:05	August 20, 2019 9:58
1908101-02	19RB6CANN002	Sediment	August 15, 2019 11:05	August 20, 2019 9:58
1908101-03	19RB6CANN003	Sediment	August 15, 2019 11:10	August 20, 2019 9:58
1908101-04	19RB6CANN004	Sediment	August 15, 2019 11:10	August 20, 2019 9:58
1908101-05	19RB6CANN006	Sediment	August 16, 2019 9:25	August 20, 2019 9:58
1908101-06	19RB6CANN007	Sediment	August 16, 2019 9:26	August 20, 2019 9:58
1908101-07	19RB6CANN008	Sediment	August 16, 2019 12:25	August 20, 2019 9:58
1908101-08	19RB6CANN009	Sediment	August 16, 2019 12:26	August 20, 2019 9:58

**WORK ORDER: 1908101**
**COC Number:**
**Water Board**

 1001 I Street  
 Sacramento, CA 95814

**Project:** RWB6\_General\_2019

**PO Number:**
**Project Manager:** Emily Cushman

**Project #:** [none]

**Sample Results**

(Continued)

**Sample Date:** August 16, 2019 9:25

**Sample:** 19RB6CANN006

1908101-05 (Sediment)

**Sample Type:**
**Prep Date:** August 30, 2019 15:54

Analyte	Reporting Limit	Qual	Result	Unit	Dilution Factor	Date Analyzed	Method	Batch/Analyst
---------	-----------------	------	--------	------	-----------------	---------------	--------	---------------

**Organochlorine Pesticides by EPA 8081**

Alpha-BHC	0.00002		ND	ug/kg dry	1	9/19/19	EPA 8081	19I0211/NG
<b>Hexachlorobenzene</b>	0.00002		<b>10.6</b>	ug/kg dry	1	9/19/19	EPA 8081	19I0211/NG
Lindane	0.00002		ND	ug/kg dry	1	9/19/19	EPA 8081	19I0211/NG
Beta-BHC	0.00002		ND	ug/kg dry	1	9/19/19	EPA 8081	19I0211/NG
Delta-BHC	0.00002		ND	ug/kg dry	1	9/19/19	EPA 8081	19I0211/NG
Heptachlor	0.00002		ND	ug/kg dry	1	9/19/19	EPA 8081	19I0211/NG
Aldrin	0.00002		ND	ug/kg dry	1	9/19/19	EPA 8081	19I0211/NG
Heptachlor epoxide	0.00002		ND	ug/kg dry	1	9/19/19	EPA 8081	19I0211/NG
2,4 DDE	0.00002		ND	ug/kg dry	1	9/19/19	EPA 8081	19I0211/NG
Gamma chlordane	0.00002		ND	ug/kg dry	1	9/19/19	EPA 8081	19I0211/NG
Alpha chlordane	0.00002		ND	ug/kg dry	1	9/19/19	EPA 8081	19I0211/NG
Endosulfan I	0.00002		ND	ug/kg dry	1	9/19/19	EPA 8081	19I0211/NG
4,4' DDE	0.00002		ND	ug/kg dry	1	9/19/19	EPA 8081	19I0211/NG
2,4'-DDD	0.00002		ND	ug/kg dry	1	9/19/19	EPA 8081	19I0211/NG
Dieldrin	0.00002		ND	ug/kg dry	1	9/19/19	EPA 8081	19I0211/NG
Perthane	0.00002		ND	ug/kg dry	1	9/19/19	EPA 8081	19I0211/NG
Endrin	0.00002		ND	ug/kg dry	1	9/19/19	EPA 8081	19I0211/NG
2,4 DDT	0.00002		ND	ug/kg dry	1	9/19/19	EPA 8081	19I0211/NG
cis-Nonachlor	0.00002		ND	ug/kg dry	1	9/19/19	EPA 8081	19I0211/NG
4,4' DDD	0.00002		ND	ug/kg dry	1	9/19/19	EPA 8081	19I0211/NG
Endosulfan II	0.00002		ND	ug/kg dry	1	9/19/19	EPA 8081	19I0211/NG
Endrin aldehyde	0.00002		ND	ug/kg dry	1	9/19/19	EPA 8081	19I0211/NG
4,4' DDT	0.00002		ND	ug/kg dry	1	9/19/19	EPA 8081	19I0211/NG
Endosulfan sulfate	0.00002		ND	ug/kg dry	1	9/19/19	EPA 8081	19I0211/NG
Methoxychlor	0.00002		ND	ug/kg dry	1	9/19/19	EPA 8081	19I0211/NG
Endrin Ketone	0.00002		ND	ug/kg dry	1	9/19/19	EPA 8081	19I0211/NG
Mirex	0.00002		ND	ug/kg dry	1	9/19/19	EPA 8081	19I0211/NG
<b>Dicofol</b>	0.00002		<b>24.7</b>	ug/kg dry	1	9/19/19	EPA 8081	19I0211/NG

The contents of this report apply to the sample(s) analyzed in accordance with the chain of custody document.  
 No duplication of this report is allowed, except in its entirety.



**WORK ORDER: 1908101**
**COC Number:**
**Water Board**

 1001 I Street  
 Sacramento, CA 95814

**Project:** RWB6\_General\_2019

**PO Number:**
**Project Manager:** Emily Cushman

**Project #:** [none]

**Sample Results**

(Continued)

**Sample Date:** August 16, 2019 9:25

**Sample: 19RB6CANN006 (Continued)**  
**1908101-05 (Sediment)**
**Sample Type:**
**Prep Date:** August 30, 2019 15:54

Analyte	Reporting Limit	Qual	Result	Unit	Dilution Factor	Date Analyzed	Method	Batch/Analyst
<b>Organochlorine Pesticides by EPA 8081 (Continued)</b>								
<i>Surrogate: 2-Fluorobiphenyl</i>	15-150		81.9%			9/19/19	EPA 8081	19I0211/NG

**WORK ORDER: 1908101**
**COC Number:**
**Water Board**

 1001 I Street  
 Sacramento, CA 95814

**Project:** RWB6\_General\_2019

**PO Number:**
**Project Manager:** Emily Cushman

**Project #:** [none]

**Sample Results**

(Continued)

**Sample Date:** August 16, 2019 9:26

**Sample:** 19RB6CANN007

1908101-06 (Sediment)

**Sample Type:**
**Prep Date:** September 5, 2019 15:2

Analyte	Reporting Limit	Qual	Result	Unit	Dilution Factor	Date Analyzed	Method	Batch/Analyst
<b>% Solid</b>								
% Solids	0.10		50	% DW	1	10/9/19	By Calculation	19I0073/TM M

**WORK ORDER: 1908101**
**COC Number:**
**Water Board**

 1001 I Street  
 Sacramento, CA 95814

**Project:** RWB6\_General\_2019

**PO Number:**
**Project Manager:** Emily Cushman

**Project #:** [none]

### Sample Results

(Continued)

**Sample Date:** August 16, 2019 9:26

**Sample: 19RB6CANN007 (Continued)**  
 1908101-06 (Sediment)

**Sample Type:**
**Prep Date:** August 30, 2019 13:35

Analyte	Reporting Limit	Qual	Result	Unit	Dilution Factor	Date Analyzed	Method	Batch/Analyst
<b>Organophosphorus Pesticides</b>								
Atrazine			0.00	ug/kg dw dry	1	9/19/19	EPA 625	19I0228/NG
<b>Dichlorvos (DDVS)</b>			<b>1.55</b>	ug/kg dw dry	1	9/19/19	EPA 625	19I0228/NG
Mevinphos (Phosdrin)			0.00	ug/kg dw dry	1	9/19/19	EPA 625	19I0228/NG
<b>Demeton-O</b>			<b>1.33</b>	ug/kg dw dry	1	9/19/19	EPA 625	19I0228/NG
Ethoprop			0.00	ug/kg dw dry	1	9/19/19	EPA 625	19I0228/NG
Naled (Dibrom)			0.00	ug/kg dw dry	1	9/19/19	EPA 625	19I0228/NG
Phorate			0.00	ug/kg dw dry	1	9/19/19	EPA 625	19I0228/NG
<b>Demeton-S</b>			<b>4.64</b>	ug/kg dw dry	1	9/19/19	EPA 625	19I0228/NG
Dimethoate			0.00	ug/kg dw dry	1	9/19/19	EPA 625	19I0228/NG
<b>Diazinon</b>			<b>10.2</b>	ug/kg dw dry	1	9/19/19	EPA 625	19I0228/NG
<b>Disulfoton</b>			<b>9.06</b>	ug/kg dw dry	1	9/19/19	EPA 625	19I0228/NG
Methyl Parathion			0.00	ug/kg dw dry	1	9/19/19	EPA 625	19I0228/NG
Ronnel (Fenclorphos)			0.00	ug/kg dw dry	1	9/19/19	EPA 625	19I0228/NG
Malathion			0.00	ug/kg dw dry	1	9/19/19	EPA 625	19I0228/NG
Chlorpyrifos			0.00	ug/kg dw dry	1	9/19/19	EPA 625	19I0228/NG
Fenthion			0.00	ug/kg dw dry	1	9/19/19	EPA 625	19I0228/NG
Ethyl Parathion/Prowl			0.00	ug/kg dw dry	1	9/19/19	EPA 625	19I0228/NG
Merphos			0.00	ug/kg dw dry	1	9/19/19	EPA 625	19I0228/NG

The contents of this report apply to the sample(s) analyzed in accordance with the chain of custody document.  
 No duplication of this report is allowed, except in its entirety.

**WORK ORDER: 1908101**
**COC Number:**
**Water Board**

 1001 I Street  
 Sacramento, CA 95814

**Project:** RWB6\_General\_2019

**PO Number:**
**Project Manager:** Emily Cushman

**Project #:** [none]

### Sample Results

(Continued)

**Sample Date:** August 16, 2019 9:26

**Sample: 19RB6CANN007 (Continued)**  
**1908101-06 (Sediment)**
**Sample Type:**
**Prep Date:** August 30, 2019 13:35

Analyte	Reporting Limit	Qual	Result	Unit	Dilution Factor	Date Analyzed	Method	Batch/Analyst
---------	-----------------	------	--------	------	-----------------	---------------	--------	---------------

**Organophosphorus Pesticides (Continued)**

Methidathion			0.00	ug/kg dw dry	1	9/19/19	EPA 625	19I0228/NG
Trichloronate			0.00	ug/kg dw dry	1	9/19/19	EPA 625	19I0228/NG
Tetrachlorvinphos			0.00	ug/kg dw dry	1	9/19/19	EPA 625	19I0228/NG
Tokuthion (Prothiofos)			0.00	ug/kg dw dry	1	9/19/19	EPA 625	19I0228/NG
Chlorzoxazone			0.00	ug/kg dw dry	1	9/19/19	EPA 625	19I0228/NG
Fensulfothion			0.00	ug/kg dw dry	1	9/19/19	EPA 625	19I0228/NG
Ethion			0.00	ug/kg dw dry	1	9/19/19	EPA 625	19I0228/NG
Bolstar (Sulprofos)			0.00	ug/kg dw dry	1	9/19/19	EPA 625	19I0228/NG
Phosmet			0.00	ug/kg dw dry	1	9/19/19	EPA 625	19I0228/NG
Azinphos methyl (Guthion)			0.00	ug/kg dw dry	1	9/19/19	EPA 625	19I0228/NG
Coumaphos (Co-Ral)			0.00	ug/kg dw dry	1	9/19/19	EPA 625	19I0228/NG
<hr/>								
<i>Surrogate: Nitrobenzene-d5</i>	<i>15-150</i>		<i>31.4%</i>			<i>9/19/19</i>	<i>EPA 625</i>	<i>19I0228/NG</i>
<i>Surrogate: 2-Fluorobiphenyl</i>	<i>15-150</i>		<i>81.9%</i>			<i>9/19/19</i>	<i>EPA 625</i>	<i>19I0228/NG</i>
<i>Surrogate: p-Terphenyl-d14</i>	<i>15-150</i>		<i>214%</i>			<i>9/19/19</i>	<i>EPA 625</i>	<i>19I0228/NG</i>

**WORK ORDER: 1908101**
**COC Number:**
**Water Board**

 1001 I Street  
 Sacramento, CA 95814

**Project:** RWB6\_General\_2019

**PO Number:**
**Project Manager:** Emily Cushman

**Project #:** [none]

### Quality Control

**% Solid** **Prepared: Sep-05-19 Analyzed: Oct-09-19**

Analyte	Source Result	Result	Qual	Reporting Limit	Unit	Spike Level	% REC	%REC Limits	RPD	RPD Limit
---------	---------------	--------	------	-----------------	------	-------------	-------	-------------	-----	-----------

**Batch: 19I0073**
**Analyst: TMM**
**Blank (19I0073-BLK1)**

% Solids		100		0.10	% DW					
----------	--	-----	--	------	------	--	--	--	--	--

**LCS (19I0073-BS1)**

% Solids		98		0.10	% DW			80-120		
----------	--	----	--	------	------	--	--	--------	--	--

**LCS Dup (19I0073-BSD1)**

% Solids		87		0.10	% DW			80-120	11.7	20
----------	--	----	--	------	------	--	--	--------	------	----

**Duplicate (19I0073-DUP1)**

		<b>Source: 1908136-04</b>								
% Solids	44	48		0.10	% DW				8.21	20

**Matrix Spike (19I0073-MS1)**

		<b>Source: 1908136-05</b>								
% Solids	64	62		0.10	% DW			80-120		

**Matrix Spike Dup (19I0073-MSD1)**

		<b>Source: 1908136-05</b>								
% Solids	64	58		0.10	% DW			80-120	5.98	20

**WORK ORDER: 1908101**
**COC Number:**
**Water Board**

 1001 I Street  
 Sacramento, CA 95814

**Project:** RWB6\_General\_2019

**PO Number:**
**Project Manager:** Emily Cushman

**Project #:** [none]

**Quality Control**  
 (Continued)

**Organochlorine Pesticides by EPA 8081**
**Prepared: Aug-30-19 Analyzed: Sep-19-19**

Analyte	Source Result	Result	Qual	Reporting Limit	Unit	Spike Level	% REC	%REC Limits	RPD	RPD Limit
---------	---------------	--------	------	-----------------	------	-------------	-------	-------------	-----	-----------

**Batch: 19I0211**
**Analyst: NG**
**Blank (19I0211-BLK1)**

2,4'-DDE		ND		0.000002	ug/kg wet					
2,4'-DDT		ND		0.000002	ug/kg wet					
Alpha-BHC		ND		0.00004	ug/kg wet					
Hexachlorobenzene		ND		0.00004	ug/kg wet					
Lindane		ND		0.00004	ug/kg wet					
Beta-BHC		ND		0.00004	ug/kg wet					
Delta-BHC		ND		0.00004	ug/kg wet					
Heptachlor		ND		0.00004	ug/kg wet					
Aldrin		ND		0.00004	ug/kg wet					
Heptachlor epoxide		ND		0.00004	ug/kg wet					
2,4 DDE		ND		0.00004	ug/kg wet					
Gamma chlordane		ND		0.00004	ug/kg wet					
Alpha chlordane		ND		0.00004	ug/kg wet					
Endosulfan I		ND		0.00004	ug/kg wet					
4,4' DDE		ND		0.00004	ug/kg wet					
2,4'-DDD		ND		0.00004	ug/kg wet					
Dieldrin		ND		0.00004	ug/kg wet					
Perthane		ND		0.00004	ug/kg wet					
Endrin		ND		0.00004	ug/kg wet					
2,4 DDT		ND		0.00004	ug/kg wet					
cis-Nonachlor		ND		0.00004	ug/kg wet					
4,4' DDD		ND		0.00004	ug/kg wet					
Endosulfan II		ND		0.00004	ug/kg wet					
Endrin aldehyde		ND		0.00004	ug/kg wet					
4,4' DDT		ND		0.00004	ug/kg wet					
Endosulfan sulfate		ND		0.00004	ug/kg wet					
Methoxychlor		ND		0.00004	ug/kg wet					
Endrin Ketone		ND		0.00004	ug/kg wet					
Mirex		ND		0.00004	ug/kg wet					
Dicofol		ND		0.00004	ug/kg wet					

The contents of this report apply to the sample(s) analyzed in accordance with the chain of custody document.  
 No duplication of this report is allowed, except in its entirety.

**WORK ORDER: 1908101**
**COC Number:**
**Water Board**

 1001 I Street  
 Sacramento, CA 95814

**Project:** RWB6\_General\_2019

**PO Number:**
**Project Manager:** Emily Cushman

**Project #:** [none]

**Quality Control**  
 (Continued)

**Organochlorine Pesticides by EPA 8081 (Continued)**
**Prepared: Aug-30-19 Analyzed: Sep-19-19**

Analyte	Source Result	Result	Qual	Reporting Limit	Unit	Spike Level	% REC	%REC Limits	RPD	RPD Limit
---------	---------------	--------	------	-----------------	------	-------------	-------	-------------	-----	-----------

**Batch: 19I0211 (Continued)**
**Analyst: NG**
**Blank (19I0211-BLK1)**
*Surrogate: 2-Fluorobiphenyl* 1260 ug/kg wet 1950 64.6 15-150
**LCS (19I0211-BS1)**

2,4'-DDT	ND	0.000002	ug/kg wet					70-130		
2,4'-DDE	ND	0.000002	ug/kg wet					70-130		
Alpha-BHC	295	0.00004	ug/kg wet	197	149	15-150				
Hexachlorobenzene	216	0.00004	ug/kg wet	197	109	15-150				
Lindane	176	0.00004	ug/kg wet	197	89.2	15-150				
Beta-BHC	156	0.00004	ug/kg wet	197	79.2	15-150				
Delta-BHC	187	0.00004	ug/kg wet	197	94.5	15-150				
Heptachlor	65.6	0.00004	ug/kg wet	197	33.2	15-150				
Aldrin	224	0.00004	ug/kg wet	197	114	15-150				
Heptachlor epoxide	237	0.00004	ug/kg wet	197	120	15-150				
Gamma chlordane	249	0.00004	ug/kg wet	197	126	15-150				
Alpha chlordane	257	0.00004	ug/kg wet	197	130	15-150				
Endosulfan I	284	0.00004	ug/kg wet	197	144	15-150				
4,4' DDE	253	0.00004	ug/kg wet	197	128	15-150				
2,4'-DDD	ND	0.000002	ug/kg wet			70-130				
Dieldrin	221	0.00004	ug/kg wet	197	112	15-150				
Perthane	ND	0.000002	ug/kg wet			70-130				
Endrin	90.8	0.00004	ug/kg wet	197	46.0	15-150				
4,4' DDD	241	0.00004	ug/kg wet	197	122	15-150				
Endosulfan II	207	0.00004	ug/kg wet	197	105	15-150				
Endrin aldehyde	237	0.00004	ug/kg wet	197	120	15-150				
4,4' DDT	37.1	0.00004	ug/kg wet	197	18.8	15-150				
Endosulfan sulfate	208	0.00004	ug/kg wet	197	105	15-150				
Methoxychlor	183	0.00004	ug/kg wet	197	92.7	15-150				
Endrin Ketone	201	0.00004	ug/kg wet	197	102	15-150				
Mirex	151	0.00004	ug/kg wet	197	76.6	15-150				
Dicofol	1380	0.00004	ug/kg wet	1970	69.8	15-150				

**WORK ORDER: 1908101**
**COC Number:**
**Water Board**

 1001 I Street  
 Sacramento, CA 95814

**Project:** RWB6\_General\_2019

**PO Number:**
**Project Manager:** Emily Cushman

**Project #:** [none]

**Quality Control**  
 (Continued)

**Organochlorine Pesticides by EPA 8081 (Continued)**
**Prepared: Aug-30-19 Analyzed: Sep-19-19**

Analyte	Source Result	Result	Qual	Reporting Limit	Unit	Spike Level	% REC	%REC Limits	RPD	RPD Limit
---------	---------------	--------	------	-----------------	------	-------------	-------	-------------	-----	-----------

**Batch: 19I0211 (Continued)**
**Analyst: NG**
**LCS (19I0211-BS1)**
*Surrogate: 2-Fluorobiphenyl*

2370

ug/kg wet

1970

120

15-150

**LCS Dup (19I0211-BSD1)**

2,4'-DDE	ND	0.0000002	ug/kg wet					70-130		30
2,4'-DDT	ND	0.0000002	ug/kg wet					70-130		30
Alpha-BHC	246	0.00004	ug/kg wet	198	124	15-150	18.1			50
Hexachlorobenzene	179	0.00004	ug/kg wet	198	90.4	15-150	18.7			50
Lindane	149	0.00004	ug/kg wet	198	75.4	15-150	16.6			50
Beta-BHC	129	0.00004	ug/kg wet	198	65.0	15-150	19.5			50
Delta-BHC	161	0.00004	ug/kg wet	198	81.4	15-150	14.7			50
Heptachlor	58.4	0.00004	ug/kg wet	198	29.5	15-150	11.6			50
Aldrin	183	0.00004	ug/kg wet	198	92.5	15-150	20.4			50
Heptachlor epoxide	197	0.00004	ug/kg wet	198	99.4	15-150	18.6			50
Gamma chlordane	207	0.00004	ug/kg wet	198	105	15-150	18.3			50
Alpha chlordane	217	0.00004	ug/kg wet	198	110	15-150	17.1			50
Endosulfan I	241	0.00004	ug/kg wet	198	122	15-150	16.5			50
4,4' DDE	220	0.00004	ug/kg wet	198	111	15-150	13.9			50
2,4'-DDD	ND	0.0000002	ug/kg wet					70-130		30
Dieldrin	246	0.00004	ug/kg wet	198	124	15-150	10.4			50
Perthane	ND	0.0000002	ug/kg wet					70-130		30
Endrin	75.0	0.00004	ug/kg wet	198	37.9	15-150	19.1			50
4,4' DDD	278	0.00004	ug/kg wet	198	141	15-150	14.2			50
Endosulfan II	208	0.00004	ug/kg wet	198	105	15-150	0.670			50
Endrin aldehyde	203	0.00004	ug/kg wet	198	102	15-150	15.6			50
4,4' DDT	38.4	0.00004	ug/kg wet	198	19.4	15-150	3.34			50
Endosulfan sulfate	196	0.00004	ug/kg wet	198	98.9	15-150	5.98			50
Methoxychlor	224	0.00004	ug/kg wet	198	113	15-150	20.0			50
Endrin Ketone	186	0.00004	ug/kg wet	198	94.2	15-150	7.37			50
Mirex	134	0.00004	ug/kg wet	198	67.5	15-150	12.4			50
Dicofol	1060	0.00004	ug/kg wet	1980	53.4	15-150	26.4			50

The contents of this report apply to the sample(s) analyzed in accordance with the chain of custody document.  
 No duplication of this report is allowed, except in its entirety.





**WORK ORDER: 1908101**
**COC Number:**
**Water Board**

 1001 I Street  
 Sacramento, CA 95814

**Project:** RWB6\_General\_2019

**PO Number:**
**Project Manager:** Emily Cushman

**Project #:** [none]

**Quality Control**  
 (Continued)

**Organochlorine Pesticides by EPA 8081 (Continued)**
**Prepared: Aug-30-19 Analyzed: Sep-19-19**

Analyte	Source Result	Result	Qual	Reporting Limit	Unit	Spike Level	% REC	%REC Limits	RPD	RPD Limit
---------	---------------	--------	------	-----------------	------	-------------	-------	-------------	-----	-----------

**Batch: 19I0211 (Continued)**
**Analyst: NG**
**Duplicate (19I0211-DUP1)**
**Source: 1908101-03**

Endrin Ketone	ND	ND		0.00001	ug/kg dry					200
Mirex	ND	ND		0.00001	ug/kg dry					200
Dicofol	ND	ND		0.00001	ug/kg dry					30

*Surrogate: 2-Fluorobiphenyl*

348

ug/kg dry

659

52.8

15-150

**Matrix Spike (19I0211-MS1)**
**Source: 1908101-01**

Alpha-BHC	ND	63.8		0.00001	ug/kg dry	69.2	92.3	15-150		
Hexachlorobenzene	ND	78.4		0.00001	ug/kg dry	69.2	113	15-150		
Lindane	ND	29.5		0.00001	ug/kg dry	69.2	42.6	15-150		
Beta-BHC	ND	18.5		0.00001	ug/kg dry	69.2	26.8	15-150		
Delta-BHC	ND	97.7		0.00001	ug/kg dry	69.2	141	15-150		
Aldrin	ND	76.2		0.00001	ug/kg dry	69.2	110	15-150		
Heptachlor epoxide	ND	50.2		0.00001	ug/kg dry	69.2	72.6	15-150		
2,4 DDE	ND	ND		0.00001	ug/kg dry			15-150		
Gamma chlordane	ND	56.8		0.00001	ug/kg dry	69.2	82.1	15-150		
Alpha chlordane	ND	58.9		0.00001	ug/kg dry	69.2	85.2	15-150		
Endosulfan I	ND	75.1		0.00001	ug/kg dry	69.2	109	15-150		
4,4' DDE	ND	77.0		0.00001	ug/kg dry	69.2	111	15-150		
2,4'-DDD	ND	ND		0.00001	ug/kg dry			15-150		
Dieldrin	ND	83.4		0.00001	ug/kg dry	69.2	121	15-150		
Perthane	ND	ND		0.00001	ug/kg dry			15-150		
Endrin	ND	24.8		0.00001	ug/kg dry	69.2	35.8	15-150		
2,4 DDT	ND	ND		0.00001	ug/kg dry			15-150		
4,4' DDD	ND	48.3		0.00001	ug/kg dry	69.2	69.9	15-150		
Endosulfan II	ND	63.1		0.00001	ug/kg dry	69.2	91.3	15-150		
Endrin aldehyde	ND	66.2		0.00001	ug/kg dry	69.2	95.7	15-150		
Endosulfan sulfate	ND	79.7		0.00001	ug/kg dry	69.2	115	15-150		
Methoxychlor	ND	94.5		0.00001	ug/kg dry	69.2	137	15-150		
Endrin Ketone	ND	63.4		0.00001	ug/kg dry	69.2	91.7	15-150		
Mirex	ND	12.2		0.00001	ug/kg dry	69.2	17.7	15-150		

The contents of this report apply to the sample(s) analyzed in accordance with the chain of custody document.  
 No duplication of this report is allowed, except in its entirety.

**WORK ORDER: 1908101**
**COC Number:**
**Water Board**

 1001 I Street  
 Sacramento, CA 95814

**Project:** RWB6\_General\_2019

**PO Number:**
**Project Manager:** Emily Cushman

**Project #:** [none]

**Quality Control**  
 (Continued)

**Organochlorine Pesticides by EPA 8081 (Continued)**
**Prepared: Aug-30-19 Analyzed: Sep-19-19**

Analyte	Source Result	Result	Qual	Reporting Limit	Unit	Spike Level	% REC	%REC Limits	RPD	RPD Limit
---------	---------------	--------	------	-----------------	------	-------------	-------	-------------	-----	-----------

**Batch: 19I0211 (Continued)**
**Analyst: NG**
**Matrix Spike (19I0211-MS1)**
**Source: 1908101-01**

Dicofol	ND	210		0.00001	ug/kg dry	692	30.3	15-150		
---------	----	-----	--	---------	-----------	-----	------	--------	--	--

*Surrogate: 2-Fluorobiphenyl*

		846			ug/kg dry	692	122	15-150		
--	--	-----	--	--	-----------	-----	-----	--------	--	--

**Matrix Spike Dup (19I0211-MSD1)**
**Source: 1908101-01**

Alpha-BHC	ND	62.3		0.00001	ug/kg dry	69.9	89.1	15-150	2.45	50
Hexachlorobenzene	ND	78.2		0.00001	ug/kg dry	69.9	112	15-150	0.164	50
Lindane	ND	22.2		0.00001	ug/kg dry	69.9	31.7	15-150	28.3	50
Beta-BHC	ND	21.3		0.00001	ug/kg dry	69.9	30.4	15-150	13.7	50
Delta-BHC	ND	103		0.00001	ug/kg dry	69.9	147	15-150	5.31	50
Aldrin	ND	77.4		0.00001	ug/kg dry	69.9	111	15-150	1.53	50
Heptachlor epoxide	ND	49.6		0.00001	ug/kg dry	69.9	70.9	15-150	1.29	50
2,4 DDE	ND	ND		0.00001	ug/kg dry			15-150		50
Gamma chlordane	ND	57.7		0.00001	ug/kg dry	69.9	82.6	15-150	1.69	50
Alpha chlordane	ND	61.3		0.00001	ug/kg dry	69.9	87.7	15-150	3.97	50
Endosulfan I	ND	72.5		0.00001	ug/kg dry	69.9	104	15-150	3.54	50
4,4' DDE	ND	84.9		0.00001	ug/kg dry	69.9	122	15-150	9.84	50
2,4'-DDD	ND	ND		0.00001	ug/kg dry			15-150		50
Dieldrin	ND	88.1		0.00001	ug/kg dry	69.9	126	15-150	5.46	50
Perthane	ND	ND		0.00001	ug/kg dry			15-150		50
Endrin	ND	25.1		0.00001	ug/kg dry	69.9	35.9	15-150	1.36	50
2,4 DDT	ND	ND		0.00001	ug/kg dry			15-150		50
4,4' DDD	ND	50.5		0.00001	ug/kg dry	69.9	72.2	15-150	4.32	50
Endosulfan II	ND	57.7		0.00001	ug/kg dry	69.9	82.5	15-150	9.05	50
Endrin aldehyde	ND	102		0.00001	ug/kg dry	69.9	146	15-150	42.7	50
Endosulfan sulfate	ND	80.8		0.00001	ug/kg dry	69.9	116	15-150	1.34	50
Methoxychlor	ND	98.2		0.00001	ug/kg dry	69.9	140	15-150	3.89	50
Endrin Ketone	ND	56.8		0.00001	ug/kg dry	69.9	81.3	15-150	10.9	50
Mirex	ND	10.8		0.00001	ug/kg dry	69.9	15.4	15-150	12.8	50
Dicofol	ND	207		0.00001	ug/kg dry	699	29.7	15-150	1.12	50

The contents of this report apply to the sample(s) analyzed in accordance with the chain of custody document.  
 No duplication of this report is allowed, except in its entirety.

**WORK ORDER: 1908101**
**COC Number:**
**Water Board**

 1001 I Street  
 Sacramento, CA 95814

**Project:** RWB6\_General\_2019

**PO Number:**
**Project Manager:** Emily Cushman

**Project #:** [none]

**Quality Control**  
 (Continued)

**Organochlorine Pesticides by EPA 8081 (Continued)**
**Prepared: Aug-30-19 Analyzed: Sep-19-19**

Analyte	Source Result	Result	Qual	Reporting Limit	Unit	Spike Level	% REC	%REC Limits	RPD	RPD Limit
---------	---------------	--------	------	-----------------	------	-------------	-------	-------------	-----	-----------

**Batch: 19I0211 (Continued)**
**Analyst: NG**
**Matrix Spike Dup (19I0211-MSD1)**
**Source: 1908101-01**

<i>Surrogate: 2-Fluorobiphenyl</i>	807	ug/kg dry	699	115	15-150
------------------------------------	-----	-----------	-----	-----	--------

**WORK ORDER: 1908101**
**COC Number:**
**Water Board**

 1001 I Street  
 Sacramento, CA 95814

**Project:** RWB6\_General\_2019

**PO Number:**
**Project Manager:** Emily Cushman

**Project #:** [none]

**Quality Control**  
 (Continued)

**Organophosphorus Pesticides**
**Prepared: Aug-30-19 Analyzed: Sep-19-19**

Analyte	Source Result	Result	Qual	Reporting Limit	Unit	Spike Level	% REC	%REC Limits	RPD	RPD Limit
---------	---------------	--------	------	-----------------	------	-------------	-------	-------------	-----	-----------

**Batch: 19I0228**
**Analyst: NG**
**Blank (19I0228-BLK1)**

Atrazine		0.00			ug/kg dw wet					
Dichlorvos (DDVS)		0.00			ug/kg dw wet					
Mevinphos (Phosdrin)		0.00			ug/kg dw wet					
Demeton-O		0.00			ug/kg dw wet					
Ethoprop		0.00			ug/kg dw wet					
Naled (Dibrom)		0.00			ug/kg dw wet					
Phorate		0.00			ug/kg dw wet					
Demeton-S		0.00			ug/kg dw wet					
Dimethoate		0.00			ug/kg dw wet					
Diazinon		0.00			ug/kg dw wet					
Disulfoton		0.00			ug/kg dw wet					
Methyl Parathion		0.00			ug/kg dw wet					
Ronnel (Fenclorphos)		0.00			ug/kg dw wet					
Malathion		0.00			ug/kg dw wet					
Fenthion		0.00			ug/kg dw wet					
Chlorpyrifos		0.00			ug/kg dw wet					
Ethyl Parathion/Prowl		0.00			ug/kg dw wet					

The contents of this report apply to the sample(s) analyzed in accordance with the chain of custody document.  
 No duplication of this report is allowed, except in its entirety.

**WORK ORDER: 1908101**
**COC Number:**
**Water Board**

 1001 I Street  
 Sacramento, CA 95814

**Project:** RWB6\_General\_2019

**PO Number:**
**Project Manager:** Emily Cushman

**Project #:** [none]

**Quality Control**  
 (Continued)

**Organophosphorus Pesticides (Continued)**
**Prepared: Aug-30-19 Analyzed: Sep-19-19**

Analyte	Source Result	Result	Qual	Reporting Limit	Unit	Spike Level	% REC	%REC Limits	RPD	RPD Limit
---------	---------------	--------	------	-----------------	------	-------------	-------	-------------	-----	-----------

**Batch: 19I0228 (Continued)**
**Analyst: NG**
**Blank (19I0228-BLK1)**

<b>Merphos</b>		<b>0.00</b>			ug/kg dw wet					
<b>Trichloronate</b>		<b>0.00</b>			ug/kg dw wet					
<b>Methidathion</b>		<b>0.00</b>			ug/kg dw wet					
<b>Tetrachlorvinphos</b>		<b>0.00</b>			ug/kg dw wet					
<b>Tokuthion (Prothiofos)</b>		<b>0.00</b>			ug/kg dw wet					
<b>Chlorzoxazone</b>		<b>0.00</b>			ug/kg dw wet					
<b>Fensulfothion</b>		<b>0.00</b>			ug/kg dw wet					
<b>Ethion</b>		<b>0.00</b>			ug/kg dw wet					
<b>Bolstar (Sulprofos)</b>		<b>0.00</b>			ug/kg dw wet					
<b>Phosmet</b>		<b>0.00</b>			ug/kg dw wet					
<b>Azinphos methyl (Guthion)</b>		<b>0.00</b>			ug/kg dw wet					
<b>Coumaphos (Co-Ral)</b>		<b>0.00</b>			ug/kg dw wet					
<i>Surrogate: Nitrobenzene-d5</i>		<i>1640</i>			<i>ug/kg dw wet</i>	<i>1950</i>	<i>84.1</i>	<i>15-150</i>		
<i>Surrogate: 2-Fluorobiphenyl</i>		<i>1060</i>			<i>ug/kg dw wet</i>	<i>1950</i>	<i>54.2</i>	<i>15-150</i>		
<i>Surrogate: p-Terphenyl-d14</i>		<i>1680</i>			<i>ug/kg dw wet</i>	<i>1950</i>	<i>86.3</i>	<i>15-150</i>		

**LCS (19I0228-BS1)**

<b>Atrazine</b>		<b>0.00</b>			ug/kg dw wet			15-150		
-----------------	--	-------------	--	--	-----------------	--	--	--------	--	--

The contents of this report apply to the sample(s) analyzed in accordance with the chain of custody document.  
 No duplication of this report is allowed, except in its entirety.

**WORK ORDER: 1908101**
**COC Number:**
**Water Board**

 1001 I Street  
 Sacramento, CA 95814

**Project:** RWB6\_General\_2019

**PO Number:**
**Project Manager:** Emily Cushman

**Project #:** [none]

**Quality Control**  
 (Continued)

**Organophosphorus Pesticides (Continued)**
**Prepared: Aug-30-19 Analyzed: Sep-19-19**

Analyte	Source Result	Result	Qual	Reporting Limit	Unit	Spike Level	% REC	%REC Limits	RPD	RPD Limit
---------	---------------	--------	------	-----------------	------	-------------	-------	-------------	-----	-----------

**Batch: 19I0228 (Continued)**
**Analyst: NG**
**LCS (19I0228-BS1)**

Dichlorvos (DDVS)		0.00			ug/kg dw wet			15-150		
Mevinphos (Phosdrin)		0.00			ug/kg dw wet			15-150		
Demeton-O		15.4			ug/kg dw wet	61.2	25.2	0-200		
Ethoprop		0.00			ug/kg dw wet			15-150		
Naled (Dibrom)		0.00			ug/kg dw wet			15-150		
Phorate		0.00			ug/kg dw wet			15-150		
Demeton-S		34.2			ug/kg dw wet	120	28.4	0-200		
Dimethoate		0.00			ug/kg dw wet			15-150		
Diazinon		216			ug/kg dw wet	197	110	15-150		
Disulfoton		88.9			ug/kg dw wet	197	45.0	15-150		
Methyl Parathion		92.8			ug/kg dw wet	197	47.0	15-150		
Ronnel (Fenchlorphos)		0.00			ug/kg dw wet			15-150		
Malathion		140			ug/kg dw wet	197	70.8	15-150		
Fenthion		0.00			ug/kg dw wet			15-150		
Chlorpyrifos		0.00			ug/kg dw wet			15-150		
Ethyl Parathion/Prowl		120			ug/kg dw wet			15-150		
Merphos		0.00			ug/kg dw wet			15-150		

The contents of this report apply to the sample(s) analyzed in accordance with the chain of custody document.  
 No duplication of this report is allowed, except in its entirety.

**WORK ORDER: 1908101**
**COC Number:**
**Water Board**

 1001 I Street  
 Sacramento, CA 95814

**Project:** RWB6\_General\_2019

**PO Number:**
**Project Manager:** Emily Cushman

**Project #:** [none]

**Quality Control**  
 (Continued)

**Organophosphorus Pesticides (Continued)**
**Prepared: Aug-30-19 Analyzed: Sep-19-19**

Analyte	Source Result	Result	Qual	Reporting Limit	Unit	Spike Level	% REC	%REC Limits	RPD	RPD Limit
---------	---------------	--------	------	-----------------	------	-------------	-------	-------------	-----	-----------

**Batch: 19I0228 (Continued)**
**Analyst: NG**
**LCS (19I0228-BS1)**

Methidathion		0.00			ug/kg dw wet			15-150		
Trichloronate		0.00			ug/kg dw wet			15-150		
Tetrachlorvinphos		0.00			ug/kg dw wet			15-150		
Tokuthion (Prothiofos)		0.00			ug/kg dw wet			15-150		
Chlorzoxazone		0.00			ug/kg dw wet			15-150		
Fensulfothion		0.00			ug/kg dw wet			15-150		
Ethion		207			ug/kg dw wet	197	105	15-150		
Bolstar (Sulprofos)		0.00			ug/kg dw wet			15-150		
Phosmet		0.00			ug/kg dw wet			15-150		
Azinphos methyl (Guthion)		32.8			ug/kg dw wet	197	16.6	15-150		
Coumaphos (Co-Ral)		0.00			ug/kg dw wet			15-150		
<i>Surrogate: Nitrobenzene-d5</i>		1750			ug/kg dw wet	1970	88.6	15-150		
<i>Surrogate: 2-Fluorobiphenyl</i>		1240			ug/kg dw wet	1970	63.0	15-150		
<i>Surrogate: p-Terphenyl-d14</i>		1660			ug/kg dw wet	1970	84.1	15-150		

**LCS Dup (19I0228-BSD1)**

Dichlorvos (DDVS)		0.00			ug/kg dw wet			15-150		30
Atrazine		0.00			ug/kg dw wet			15-150		30

The contents of this report apply to the sample(s) analyzed in accordance with the chain of custody document.  
 No duplication of this report is allowed, except in its entirety.



**WORK ORDER: 1908101**
**COC Number:**
**Water Board**

 1001 I Street  
 Sacramento, CA 95814

**Project:** RWB6\_General\_2019

**PO Number:**
**Project Manager:** Emily Cushman

**Project #:** [none]

**Quality Control**  
 (Continued)

**Organophosphorus Pesticides (Continued)**
**Prepared: Aug-30-19 Analyzed: Sep-19-19**

Analyte	Source Result	Result	Qual	Reporting Limit	Unit	Spike Level	% REC	%REC Limits	RPD	RPD Limit
<b>Batch: 19I0228 (Continued)</b>										
<b>Analyst: NG</b>										
<b>LCS Dup (19I0228-BSD1)</b>										
Mevinphos (Phosdrin)		0.00			ug/kg dw wet			15-150		30
Demeton-O		14.8			ug/kg dw wet	61.3	24.2	0-200	3.73	200
Ethoprop		0.00			ug/kg dw wet			15-150		30
Naled (Dibrom)		0.00			ug/kg dw wet			15-150		30
Phorate		0.00			ug/kg dw wet			15-150		30
Demeton-S		36.2			ug/kg dw wet	121	30.0	0-200	5.81	200
Dimethoate		0.00			ug/kg dw wet			15-150		30
Diazinon		180			ug/kg dw wet	198	91.2	15-150	18.1	30
Disulfoton		89.0			ug/kg dw wet	198	45.0	15-150	0.194	30
Methyl Parathion		75.4			ug/kg dw wet	198	38.1	15-150	20.7	30
Ronnel (Fenclorphos)		0.00			ug/kg dw wet			15-150		30
Malathion		119			ug/kg dw wet	198	60.0	15-150	16.3	30
Fenthion		0.00			ug/kg dw wet			15-150		30
Chlorpyrifos		0.00			ug/kg dw wet			15-150		30
Ethyl Parathion/Prowl		0.00			ug/kg dw wet			15-150		30
Merphos		0.00			ug/kg dw wet			15-150		30
Trichloronate		0.00			ug/kg dw wet			15-150		30

The contents of this report apply to the sample(s) analyzed in accordance with the chain of custody document.  
 No duplication of this report is allowed, except in its entirety.

**WORK ORDER: 1908101**
**COC Number:**
**Water Board**

 1001 I Street  
 Sacramento, CA 95814

**Project:** RWB6\_General\_2019

**PO Number:**
**Project Manager:** Emily Cushman

**Project #:** [none]

**Quality Control**  
 (Continued)

**Organophosphorus Pesticides (Continued)**
**Prepared: Aug-30-19 Analyzed: Sep-19-19**

Analyte	Source Result	Result	Qual	Reporting Limit	Unit	Spike Level	% REC	%REC Limits	RPD	RPD Limit
---------	---------------	--------	------	-----------------	------	-------------	-------	-------------	-----	-----------

**Batch: 19I0228 (Continued)**
**Analyst: NG**
**LCS Dup (19I0228-BSD1)**

Methidathion		0.00			ug/kg dw wet			15-150		30
Tetrachlorvinphos		0.00			ug/kg dw wet			15-150		30
Tokuthion (Prothiofos)		0.00			ug/kg dw wet			15-150		30
Chlorzoxazone		0.00			ug/kg dw wet			15-150		30
Fensulfothion		0.00			ug/kg dw wet			15-150		30
Ethion		200			ug/kg dw wet	198	101	15-150	3.40	30
Bolstar (Sulprofos)		0.00			ug/kg dw wet			15-150		30
Phosmet		0.00			ug/kg dw wet			15-150		30
Azinphos methyl (Guthion)		30.9			ug/kg dw wet	198	15.6	15-150	6.02	30
Coumaphos (Co-Ral)		0.00			ug/kg dw wet			15-150		30
<i>Surrogate: Nitrobenzene-d5</i>		1480			ug/kg dw wet	1980	74.7	15-150		
<i>Surrogate: 2-Fluorobiphenyl</i>		972			ug/kg dw wet	1980	49.1	15-150		
<i>Surrogate: p-Terphenyl-d14</i>		1350			ug/kg dw wet	1980	68.5	15-150		

**Duplicate (19I0228-DUP1)**
**Source: 1908101-04**

Atrazine	0.00	0.00			ug/kg dw dry					30
Dichlorvos (DDVS)	0.00	0.00			ug/kg dw dry					30
Mevinphos (Phosdrin)	0.00	0.00			ug/kg dw dry					30

The contents of this report apply to the sample(s) analyzed in accordance with the chain of custody document.  
 No duplication of this report is allowed, except in its entirety.

**WORK ORDER: 1908101**
**COC Number:**
**Water Board**

 1001 I Street  
 Sacramento, CA 95814

**Project:** RWB6\_General\_2019

**PO Number:**
**Project Manager:** Emily Cushman

**Project #:** [none]

**Quality Control**  
 (Continued)

**Organophosphorus Pesticides (Continued)**
**Prepared: Aug-30-19 Analyzed: Sep-19-19**

Analyte	Source Result	Result	Qual	Reporting Limit	Unit	Spike Level	% REC	%REC Limits	RPD	RPD Limit
---------	---------------	--------	------	-----------------	------	-------------	-------	-------------	-----	-----------

**Batch: 19I0228 (Continued)**
**Analyst: NG**
**Duplicate (19I0228-DUP1)**
**Source: 1908101-04**

Demeton-O	0.00	<b>0.00</b>			ug/kg dw dry					200
Ethoprop	0.00	<b>0.00</b>			ug/kg dw dry					30
Naled (Dibrom)	0.00	<b>0.00</b>			ug/kg dw dry					30
Phorate	0.00	<b>0.00</b>			ug/kg dw dry					30
Demeton-S	0.00	<b>0.00</b>			ug/kg dw dry					200
Dimethoate	0.00	<b>0.00</b>			ug/kg dw dry					30
Diazinon	0.00	<b>0.00</b>			ug/kg dw dry					30
Disulfoton	0.00	<b>0.00</b>			ug/kg dw dry					30
Methyl Parathion	0.00	<b>0.00</b>			ug/kg dw dry					30
Ronnel (Fenclorphos)	0.00	<b>0.00</b>			ug/kg dw dry					30
Malathion	0.00	<b>0.00</b>			ug/kg dw dry					30
Fenthion	0.00	<b>0.00</b>			ug/kg dw dry					30
Chlorpyrifos	0.00	<b>0.00</b>			ug/kg dw dry					30
Ethyl Parathion/Prowl	0.00	<b>0.00</b>			ug/kg dw dry					30
Merphos	0.00	<b>0.00</b>			ug/kg dw dry					30
Methidathion	0.00	<b>0.00</b>			ug/kg dw dry					30
Trichloronate	0.00	<b>0.00</b>			ug/kg dw dry					30

**WORK ORDER: 1908101**
**COC Number:**
**Water Board**

 1001 I Street  
 Sacramento, CA 95814

**Project:** RWB6\_General\_2019

**PO Number:**
**Project Manager:** Emily Cushman

**Project #:** [none]

**Quality Control**  
 (Continued)

**Organophosphorus Pesticides (Continued)**
**Prepared: Aug-30-19 Analyzed: Sep-19-19**

Analyte	Source Result	Result	Qual	Reporting Limit	Unit	Spike Level	% REC	%REC Limits	RPD	RPD Limit
---------	---------------	--------	------	-----------------	------	-------------	-------	-------------	-----	-----------

**Batch: 19I0228 (Continued)**
**Analyst: NG**
**Duplicate (19I0228-DUP1)**
**Source: 1908101-04**

Tetrachlorvinphos	0.00	<b>0.00</b>			ug/kg dw dry					30
Tokuthion (Prothiofos)	0.00	<b>0.00</b>			ug/kg dw dry					30
Chlorzoxazone	0.00	<b>0.00</b>			ug/kg dw dry					30
Fensulfothion	0.00	<b>0.00</b>			ug/kg dw dry					30
Ethion	0.00	<b>0.00</b>			ug/kg dw dry					30
Bolstar (Sulprofos)	0.00	<b>0.00</b>			ug/kg dw dry					30
Phosmet	0.00	<b>0.00</b>			ug/kg dw dry					30
Azinphos methyl (Guthion)	0.00	<b>0.00</b>			ug/kg dw dry					30
Coumaphos (Co-Ral)	0.00	<b>0.00</b>			ug/kg dw dry					30

*Surrogate: Nitrobenzene-d5*      252      ug/kg dw      674      37.4      15-150  
dry

*Surrogate: 2-Fluorobiphenyl*      246      ug/kg dw      674      36.5      15-150  
dry

*Surrogate: p-Terphenyl-d14*      384      ug/kg dw      674      57.1      15-150  
dry

**Matrix Spike (19I0228-MS1)**
**Source: 1908101-02**

Dichlorvos (DDVS)	0.00	<b>0.00</b>			ug/kg dw dry			15-150		
Atrazine	0.00	<b>0.00</b>			ug/kg dw dry			15-150		
Mevinphos (Phosdrin)	0.00	<b>0.00</b>			ug/kg dw dry			15-150		
Demeton-O	0.00	<b>4.75</b>			ug/kg dw dry	20.4	23.2	0-200		

**WORK ORDER: 1908101**
**COC Number:**
**Water Board**

 1001 I Street  
 Sacramento, CA 95814

**Project:** RWB6\_General\_2019

**PO Number:**
**Project Manager:** Emily Cushman

**Project #:** [none]

**Quality Control**  
 (Continued)

**Organophosphorus Pesticides (Continued)**
**Prepared: Aug-30-19 Analyzed: Sep-19-19**

Analyte	Source Result	Result	Qual	Reporting Limit	Unit	Spike Level	% REC	%REC Limits	RPD	RPD Limit
---------	---------------	--------	------	-----------------	------	-------------	-------	-------------	-----	-----------

**Batch: 19I0228 (Continued)**
**Analyst: NG**
**Matrix Spike (19I0228-MS1)**
**Source: 1908101-02**

<b>Ethoprop</b>	0.00	<b>0.00</b>			ug/kg dw dry			15-150		
<b>Naled (Dibrom)</b>	0.00	<b>0.00</b>			ug/kg dw dry			15-150		
<b>Phorate</b>	0.00	<b>0.00</b>			ug/kg dw dry			15-150		
<b>Demeton-S</b>	0.00	<b>11.5</b>			ug/kg dw dry	40.2	28.7	0-200		
<b>Dimethoate</b>	0.00	<b>0.00</b>			ug/kg dw dry			15-150		
<b>Diazinon</b>	0.00	<b>34.5</b>			ug/kg dw dry	65.9	52.4	15-150		
<b>Disulfoton</b>	0.00	<b>21.2</b>			ug/kg dw dry	65.9	32.2	15-150		
<b>Methyl Parathion</b>	0.00	<b>12.5</b>			ug/kg dw dry	65.9	18.9	15-150		
<b>Ronnel (Fenclorphos)</b>	0.00	<b>0.00</b>			ug/kg dw dry			15-150		
<b>Malathion</b>	0.00	<b>23.0</b>			ug/kg dw dry	65.9	34.9	15-150		
<b>Fenthion</b>	0.00	<b>0.00</b>			ug/kg dw dry			15-150		
<b>Chlorpyrifos</b>	0.00	<b>0.00</b>			ug/kg dw dry			15-150		
<b>Ethyl Parathion/Prowl</b>	0.00	<b>0.00</b>			ug/kg dw dry			15-150		
<b>Merphos</b>	0.00	<b>0.00</b>			ug/kg dw dry			15-150		
<b>Methidathion</b>	0.00	<b>0.00</b>			ug/kg dw dry			15-150		
<b>Trichloronate</b>	0.00	<b>0.00</b>			ug/kg dw dry			15-150		
<b>Tetrachlorvinphos</b>	0.00	<b>0.00</b>			ug/kg dw dry			15-150		

**WORK ORDER: 1908101**
**COC Number:**
**Water Board**

 1001 I Street  
 Sacramento, CA 95814

**Project:** RWB6\_General\_2019

**PO Number:**
**Project Manager:** Emily Cushman

**Project #:** [none]

**Quality Control**  
 (Continued)

**Organophosphorus Pesticides (Continued)**
**Prepared: Aug-30-19 Analyzed: Sep-19-19**

Analyte	Source Result	Result	Qual	Reporting Limit	Unit	Spike Level	% REC	%REC Limits	RPD	RPD Limit
---------	---------------	--------	------	-----------------	------	-------------	-------	-------------	-----	-----------

**Batch: 19I0228 (Continued)**
**Analyst: NG**
**Matrix Spike (19I0228-MS1)**
**Source: 1908101-02**

<b>Tokuthion (Prothiofos)</b>	0.00	<b>0.00</b>			ug/kg dw dry			15-150		
<b>Chlorzoxazone</b>	0.00	<b>0.00</b>			ug/kg dw dry			15-150		
<b>Fensulfothion</b>	0.00	<b>0.00</b>			ug/kg dw dry			15-150		
<b>Ethion</b>	0.00	<b>32.2</b>			ug/kg dw dry	65.9	48.8	15-150		
<b>Bolstar (Sulprofos)</b>	0.00	<b>0.00</b>			ug/kg dw dry			15-150		
<b>Phosmet</b>	0.00	<b>0.00</b>			ug/kg dw dry			15-150		
<b>Azinphos methyl (Guthion)</b>	0.00	<b>35.4</b>			ug/kg dw dry	65.9	53.7	15-150		
<b>Coumaphos (Co-Ral)</b>	0.00	<b>0.00</b>			ug/kg dw dry			15-150		
<i>Surrogate: Nitrobenzene-d5</i>		156			ug/kg dw dry	659	23.6	15-150		
<i>Surrogate: 2-Fluorobiphenyl</i>		240			ug/kg dw dry	659	36.5	15-150		
<i>Surrogate: p-Terphenyl-d14</i>		264			ug/kg dw dry	659	40.0	15-150		

**Matrix Spike Dup (19I0228-MSD1)**
**Source: 1908101-02**

<b>Atrazine</b>	0.00	<b>0.00</b>			ug/kg dw dry			15-150		30
<b>Dichlorvos (DDVS)</b>	0.00	<b>0.00</b>			ug/kg dw dry			15-150		30
<b>Mevinphos (Phosdrin)</b>	0.00	<b>0.00</b>			ug/kg dw dry			15-150		30
<b>Demeton-O</b>	0.00	<b>3.87</b>			ug/kg dw dry	21.4	18.1	0-200	20.3	200
<b>Ethoprop</b>	0.00	<b>0.00</b>			ug/kg dw dry			15-150		30

The contents of this report apply to the sample(s) analyzed in accordance with the chain of custody document.  
 No duplication of this report is allowed, except in its entirety.

**WORK ORDER: 1908101**
**COC Number:**
**Water Board**

 1001 I Street  
 Sacramento, CA 95814

**Project:** RWB6\_General\_2019

**PO Number:**
**Project Manager:** Emily Cushman

**Project #:** [none]

**Quality Control**  
 (Continued)

**Organophosphorus Pesticides (Continued)**
**Prepared: Aug-30-19 Analyzed: Sep-19-19**

Analyte	Source Result	Result	Qual	Reporting Limit	Unit	Spike Level	% REC	%REC Limits	RPD	RPD Limit
---------	---------------	--------	------	-----------------	------	-------------	-------	-------------	-----	-----------

**Batch: 19I0228 (Continued)**
**Analyst: NG**
**Matrix Spike Dup (19I0228-MSD1)**
**Source: 1908101-02**

<b>Naled (Dibrom)</b>	0.00	<b>0.00</b>			ug/kg dw dry			15-150		30
<b>Phorate</b>	0.00	<b>0.00</b>			ug/kg dw dry			15-150		30
<b>Demeton-S</b>	0.00	<b>10.2</b>			ug/kg dw dry	42.2	24.1	0-200	12.6	200
<b>Dimethoate</b>	0.00	<b>0.00</b>			ug/kg dw dry			15-150		30
<b>Diazinon</b>	0.00	<b>39.1</b>			ug/kg dw dry	69.2	56.5	15-150	12.3	30
<b>Disulfoton</b>	0.00	<b>19.2</b>			ug/kg dw dry	69.2	27.7	15-150	10.2	30
<b>Methyl Parathion</b>	0.00	<b>12.9</b>			ug/kg dw dry	69.2	18.7	15-150	3.73	30
<b>Ronnel (Fenclorphos)</b>	0.00	<b>0.00</b>			ug/kg dw dry			15-150		30
<b>Malathion</b>	0.00	<b>21.4</b>			ug/kg dw dry	69.2	31.0	15-150	7.05	30
<b>Chlorpyrifos</b>	0.00	<b>0.00</b>			ug/kg dw dry			15-150		30
<b>Fenthion</b>	0.00	<b>0.00</b>			ug/kg dw dry			15-150		30
<b>Ethyl Parathion/Prowl</b>	0.00	<b>16.0</b>			ug/kg dw dry			15-150		30
<b>Merphos</b>	0.00	<b>0.00</b>			ug/kg dw dry			15-150		30
<b>Trichloronate</b>	0.00	<b>0.00</b>			ug/kg dw dry			15-150		30
<b>Methidathion</b>	0.00	<b>0.00</b>			ug/kg dw dry			15-150		30
<b>Tetrachlorvinphos</b>	0.00	<b>0.00</b>			ug/kg dw dry			15-150		30
<b>Tokuthion (Prothiofos)</b>	0.00	<b>0.00</b>			ug/kg dw dry			15-150		30

The contents of this report apply to the sample(s) analyzed in accordance with the chain of custody document.  
 No duplication of this report is allowed, except in its entirety.

**WORK ORDER: 1908101**
**COC Number:**
**Water Board**

 1001 I Street  
 Sacramento, CA 95814

**Project:** RWB6\_General\_2019

**PO Number:**
**Project Manager:** Emily Cushman

**Project #:** [none]

**Quality Control**  
 (Continued)

**Organophosphorus Pesticides (Continued)**
**Prepared: Aug-30-19 Analyzed: Sep-19-19**

Analyte	Source Result	Result	Qual	Reporting Limit	Unit	Spike Level	% REC	%REC Limits	RPD	RPD Limit
---------	---------------	--------	------	-----------------	------	-------------	-------	-------------	-----	-----------

**Batch: 19I0228 (Continued)**
**Analyst: NG**
**Matrix Spike Dup (19I0228-MSD1)**
**Source: 1908101-02**

<b>Chlorzoxazone</b>	0.00	<b>0.00</b>			ug/kg dw dry			15-150		30
<b>Fensulfothion</b>	0.00	<b>0.00</b>			ug/kg dw dry			15-150		30
<b>Ethion</b>	0.00	<b>35.4</b>			ug/kg dw dry	69.2	51.2	15-150	9.59	30
<b>Bolstar (Sulprofos)</b>	0.00	<b>0.00</b>			ug/kg dw dry			15-150		30
<b>Phosmet</b>	0.00	<b>0.00</b>			ug/kg dw dry			15-150		30
<b>Azinphos methyl (Guthion)</b>	0.00	<b>33.8</b>			ug/kg dw dry	69.2	48.8	15-150	4.77	30
<b>Coumaphos (Co-Ral)</b>	0.00	<b>0.00</b>			ug/kg dw dry			15-150		30
<i>Surrogate: Nitrobenzene-d5</i>		146			ug/kg dw dry	692	21.1	15-150		
<i>Surrogate: 2-Fluorobiphenyl</i>		217			ug/kg dw dry	692	31.3	15-150		
<i>Surrogate: p-Terphenyl-d14</i>		268			ug/kg dw dry	692	38.8	15-150		



**WORK ORDER: 1908101**

**COC Number:**

**Water Board**

1001 I Street  
Sacramento, CA 95814

**Project:** RWB6\_General\_2019

**PO Number:**

**Project Manager:** Emily Cushman

**Project #:**[none]

**Notes and Definitions**

<b>Item</b>	<b>Definition</b>
Dry	Sample results reported on a dry weight basis.
ND	Analyte NOT DETECTED at or above the reporting limit.
%REC	Percent Recovery
DF	Dilution Factor
LCS	Lab Control Sample
LCSD	Lab Control Sample Duplicate
MDL	Minimum Detection Limit
MRL	Minimum Reporting Limit
MS	Matrix Spike
MSD	Matrix Spike Duplicate
RPD	Relative Percent Difference
Source	Sample that was matrix spiked or duplicated
J	Results > MDL but < MRL



**Fact Sheet – Requirements for Submitting Technical Reports  
Under Section 13267 of the California Water Code**

October 8, 2008

---

**What does it mean when the regional water board requires a technical report?**

Section 13267<sup>1</sup> of the California Water Code provides that "...the regional board may require that any person who has discharged, discharges, or who is suspected of having discharged...waste that could affect the quality of waters...shall furnish, under penalty of perjury, technical or monitoring program reports which the regional board requires".

**This requirement for a technical report seems to mean that I am guilty of something, or at least responsible for cleaning something up. What if that is not so?**

Providing the required information in a technical report is not an admission of guilt or responsibility. However, the information provided can be used by the regional water board to clarify whether a given party has responsibility.

**Are there limits to what the regional water board can ask for?**

Yes. The information required must relate to an actual or suspected discharge of waste, and the burden of compliance must bear a reasonable relationship to the need for the report and the benefits obtained. The regional water board is required to explain the reasons for its request.

**What if I can provide the information, but not by the date specified?**

A time extension can be given for good cause. Your request should be submitted in writing, giving reasons. A request for a time extension should be made as soon as it is apparent that additional time will be needed and preferably before the due date for the information.

**Are there penalties if I don't comply?**

Depending on the situation, the regional water board can impose a fine of up to \$1,000 per day, and a court can impose fines of up to \$25,000 per day as well as criminal penalties. A person who submits false information is guilty of a misdemeanor and may be fined as well.

**What if I disagree with the 13267 requirement and the regional water board staff will not change the requirement and/or date to comply?**

Any person aggrieved by this action of the Regional Water Board may petition the State Water Board to review the action in accordance with Water Code section 13320 and California Code of Regulations, title 23, sections 2050 and following. The State Water Board must *receive* the petition by 5:00 p.m., 30 days after the date of the Order, except that if the thirtieth day following the date of this Order falls on a Saturday, Sunday, or state holiday, the petition must be received by the State Water Board by 5:00 p.m. on the next business day. Copies of the law and regulations applicable to filing petitions may be found on the Internet at: [http://www.waterboards.ca.gov/public\\_notices/petitions/water\\_quality](http://www.waterboards.ca.gov/public_notices/petitions/water_quality) or will be provided upon request.

**Claim of Copyright or other Protection**

Any and all reports and other documents submitted to the Regional Board pursuant to this request will need to be copied for some or all of the following reasons: 1) normal internal use of the document, including staff copies, record copies, copies for Board members and agenda packets, 2) any further proceedings of the Regional Board and the State Water Resources Control Board, 3) any court proceeding that may involve the document, and 4) any copies requested by members of the public pursuant to the Public Records Act or other legal proceeding.

If the discharger or its contractor claims any copyright or other protection, the submittal must include a notice, and the notice will accompany all documents copied for the reasons stated above. If copyright protection for a submitted document is claimed, failure to expressly grant permission for the copying stated above will render the document unusable for the Regional Board's purposes, and will result in the document being returned to the discharger as if the task had not been completed.

**If I have more questions, who do I ask?**

Requirements for technical reports normally indicate the name, telephone number, and email address of the regional water board staff person involved at the end of the letter.

---

<sup>1</sup> All code sections referenced herein can be found by going to [www.leginfo.ca.gov](http://www.leginfo.ca.gov). Copies of the regulations cited are available from the Regional Board upon request.