ATTACHMENT G – NOTICE OF INTENT

RECEIVED
MAR 07 2011

WATER QUALITY ORDER NO. 2011-XXXX-DWQ
GENERAL PERMIT NO. CAG XXXXXX

STATEWIDE NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM PERMIT FOR RESIDUAL PESTICIDE DISCHARGES TO WATERS OF THE UNITED STATES FROM VECTOR CONTROL APPLICATIONS

I. NOTICE OF INTENT STATUS (see Instructions)

Mark only one item ☒ A. New Applicator ☐B. Change of Information: WDID# _____

☐C. Change of ownership or responsibility: WDID# _____

II. DISCHARGER INFORMATION

A. Name Saddle Creek Community Services District			
B. Mailing Address 1000 Saddle Creek Drive			
C. City Copperopolis	D. County Calaveras	E. State CA	F. Zip Code 95228
G. Contact Person Greg Hebard	H. Email address sccsd@caltel.com	I. Title Site Manager	J. Phone (209) 785-0100

III. BILLING ADDRESS (Enter Information *only* if different from Section II above)

A. Name			
B. Mailing Address			
C. City	D. County	E. State	F. Zip Code
G. Email address	H. Title	I. Phone	

IV. RECEIVING WATER INFORMATION

A. Pesticide residues discharge to (check all that apply)*:

1. Canals, ditches, or other constructed conveyance facilities owned and controlled by Discharger.
☒ Name of the conveyance system: Saddle Creek Golf Resort, Castle and Cook Inc., and Saddle Creek Community Services District

2. Canals, ditches, or other constructed conveyance facilities owned and controlled by an entity other than the Discharger.
☐ Owner's name: _____
Name of the conveyance system: _____

3. Directly to river, lake, creek, stream, bay, ocean, etc.
☐ Name of water body: _____

* A map showing the affected areas for items 1 to 3 above may be included.

B. Regional Water Quality Control Board(s) where application areas are located (REGION 1, 2, 3, 4, 5, 6, 7, 8, or 9): Region 5
(List all regions where pesticide application is proposed.)

V. PESTICIDE APPLICATION INFORMATION

A. Target Organisms: _X_ Vector Larvae _X_ Adult Vector

B. Pesticides Used: List Name and Active ingredients See Attachment E and F

C. Period of Application: Start Date January End Date December

D. Types of Adjuvants Added by the Discharger: See Attachment E and F

VI. PESTICIDES APPLICATION PLAN

A. Has a Pesticides Application Plan been prepared?*
☒ Yes ☐ No

If not, when will it be prepared? _____

* A copy of the PAP shall be included with the NOI.

B. Is the applicator familiar with its contents?

☒ Yes ☐ No

VII. NOTIFICATION

Have potentially affected governmental agencies been notified?
☐ Yes ☐ No ☒ NA

* If yes, a copy of the notifications shall be attached to the NOI.

TENTATIVE ORDER

VIII. FEE

Have you included payment of the filing fee (for first-time enrollees only) with this submittal?
☒ Yes ☐ NO ☐ NA

IX. CERTIFICATION

"I certify under penalty of law that this document and all attachments were prepared under my direction and supervision in accordance with a system designed to ensure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine or imprisonment. Additionally, I certify that the provisions of the General Permit, including developing and implementing a monitoring program, will be complied with."

A. Printed Name: Greg Hebard

B. Signature: Greg Hebard **Date:** March 3, 2011

C. Title: Site Manager

X. FOR STATE WATER BOARD USE ONLY

WDID:	**Date NOI Received:**	**Date NOI Processed:**
Case Handler's Initial:	**Fee Amount Received:** **$**	**Check #:**

TENTATIVE ORDER

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DIVISION OF WATER QUALITY

Saddle Creek Community Services District (District) PAP:

1. **Description of all target areas, if different from the water body of the target area, in to which larvicides and adulticides are being planned to be applied or may be applied to control vectors. The description shall include adjacent areas, if different from the water body of the target areas::**

   Please see District Project Area Boundary Map.

2. **Discussion of the factors influencing the decision to select pesticide applications for vector control:**

   The District uses Integrated Vector Management (IVM) to determine when pesticide applications are appropriate. The District considers source reduction, the elimination or reduction of mosquito breeding sites the best solution but is not always achievable for a variety of reasons. The District recognizes that the property owner/responsible party need to be educated on Best Management Practices (BMP).

   The District uses Best Management Practices for Mosquito Control in California as a guidance document. This document provides recommendations from the California Department of Public Health and the Mosquito and Vector Control Association of California to promote mosquito control on California properties, and enhance early detection of West Nile virus (WNV). This document can be obtained in its' electronic format by accessing the following website: htttp://www.westnile.ca.gov/resources.

3. **Pesticide products or types expected to be used and if known, their degradation by-products, the method in which they are applied, and if applicable, the adjuvants and surfactants used:**

   Please see Attachments E and F within NPDES Permit for Biological and Residual Pesticide Discharges to Waters of the U.S. from Vector Control Applications. Products can be applied by truck, backpack, hand can, all terrain vehicle and aircraft.

4. **Description of all the application areas and the target areas in the system that are being planned to be applied or may be applied. Provide a map showing these areas.**

   Any site that holds water for more than 96 hours (4 days) can produce mosquitoes. Source reduction is the District's preferred solution, and whenever possible the District works with property owners to effect long-term solutions to reduce or eliminate the need for continued applications. The sources treated by this District include: permanent/semi-permanent/seasonal wetlands, pastures, golf courses, associated water conveyance systems, and storm drains within District Project Area. Please see Boundary Map.

5. **Other control methods used (alternatives) and their limitations:**

With any mosquito source, the District's goal is to eliminate the source if possible. However, if a source can not be eliminated by the District, it uses IVM and BMP to reduce potential vector outbreaks.
The District also distributes *Gambusia affinis* (mosquitofish) to wetlands, associated water conveyance systems and neglected swimming pools as needed. District Personnel identifies mosquito breeding sites and work with property owners and land managers to reduce or eliminate mosquito breeding habitats.

6. **How much product is needed and how this amount was determined:**

EPA #	Pesticide	Amount	Unit
73049-10	VECTOBAC G	380	LBS
432-1050	PRYONONE 25-5	67.8	GAL

Pesticide amounts from 2010 were used as a gauge to determine 2011 pesticide use. The above totals represent all pesticide applications within the District Project Area Boundaries.

7. **Representative monitoring locations* and the justification for selecting these locations:**

Please see the MVCAC NPDES Coalition Monitoring Plan

8. **If applicable, list the gates or control structures and inspection schedule of those gates or control structures to ensure that they are not leaking:**

N/A

9. **Evaluation of available BMPs to determine if there are feasible alternatives to the selected pesticide application project that could reduce potential water quality impacts:**

The District uses IVM and BMP for Mosquito Control in California used to reduce the Risk of Mosquito-Associated Disease and Annoyance.

10. **Description of the BMPs to be implemented:**

A. Measures to prevent pesticide spill

District staff monitors application equipment on a daily basis to ensure proper working order. The Districts trains it employees on spill mitigation and response. Spill kits are provided in each spray vehicle and master spill kits for larger spills are located at the District office for immediate response for both on-site and off-site spills.

B. Measures to ensure that only a minimum and consistent amount is used

Spray equipment is calibrated each year and is a part of the MOU with CDPH. Each time an application is made staff check their calibration by determining the amount of area treated and the amount of material used. If there is a discrepancy the equipment is re-calibrated.

C. A plan to educate Coalition's or Discharger's staff and pesticide applicator on any potential adverse effects from the pesticide application.

Applicators are continually trained through the California Department of Public Health.

D. Descriptions of specific BMPs for each spray mode, e.g. aerial spray, truck spray, hand spray, etc.; cease and desist order

District will calibrate truck and hand larviciding equipment each year to meet application specifications. District personnel review spray records daily to ensure appropriate amounts of material are being used. Ultra Low Volume (ULV) equipment is calibrated for output and droplet size to meet label requirements. Contracted aerial larviciding equipment will be calibrated by the Contractor. Contracted aircraft will be equipped with advance guidance systems as well as drift management equipment to ensure the best available technology is being used to place product in the intended spray area.

E. Descriptions of specific BMPs for each type of environmental setting (agriculture, urban, and wetlands).

Please see Best Management Practices for Mosquito Control in California.

11. Identification of the problem.

The District's BMPs are described in the Best Management Practices for Mosquito Control in California and IVM practices used to reduce the Risk of Mosquito-Associated Disease and Annoyance.

A. If applicable, establish densities for larval and adult vector populations to serve as action threshold(s) for implementing pest management strategies

Only those sources that the District determines to represent imminent threat to public health or quality of life are treated. The District recognizes that site specific and incident specific conditions are highly variable and unpredictable and that the District relies upon the professional judgment of its employees to determine treatment thresholds. The presence of any mosquito may necessitate treatment, however higher thresholds may be applied depending on the District's resources, disease activity, or local needs. Treatment thresholds are based on a combination of the following criteria:

- Mosquito species present
- Mosquito stage/development rate
- Disease potential/pest or nuisance value

- Disease activity
- Mosquito Abundance
- Flight range
- Proximity to populated areas
- Size of source
- Presence/absence of natural predators
- Presence of sensitive/endangered species or habitats.

B. Identify target vector species to develop species-specific pest management strategies based on developmental and behavioral considerations for each species

Please see the Best Management Practices for Mosquito Control in California and the California Mosquito-borne Virus Surveillance and Response Plan.

C. Identify known breeding areas for source reduction, larval control program, and habitat management:

Any site that holds water for more than 96 hours (4 days) can produce mosquitoes. Source reduction is the District's preferred solution, and whenever possible the District works with property owners to implement long-term solutions to reduce or eliminate the need for continued applications.

D. Analyze existing surveillance data to identify new or unidentified sources of vector problems as well as areas that have recurring vector problems.

This information is located at the Saddle Creek Community Services District office. The District uses New Jersey Light Traps (NJLT) to collect abundance data for various mosquito species. The District also participates in the dead bird program through the California Department of Public Health Services. NJLT are located throughout the District. Collections are made weekly beginning April through October of each year. Sentinel chickens are located within the District to isolate virus activity and to assess current control program effectiveness. Control Operator inspections and trapping data provide the District with larval and adult mosquito abundance to determine future spray applications to reduce nuisance and risk of mosquito borne infections to people and their animals.

12. Examination of Pesticide Use Alternatives

A. Evaluating management and treatment options that may impact water quality, non-target organisms, vector resistance, feasibility, and cost effectiveness, such as:

- **No action**
- **Source prevention**
- **Mechanical or physical source reduction methods**
- **Cultural methods**
- **Biological control agents**

- **Pesticides**

B. If there are no alternatives to pesticides, dischargers shall use the least toxic pesticide necessary to control the target pest and apply pesticides only when vectors are present at a level that will constitute a nuisance or a threat to public health.

This describes the District's existing IVM program, as well as the practices described in the California Mosquito-borne Virus Surveillance and Response Plan and Best Management Practices for Mosquito Control in California that are used by this agency.

13. Correct Use of Pesticides

Coalition's or Discharger's use of pesticides must ensure that all reasonable precautions are taken to minimize the impacts caused by pesticide applications. Reasonable precautions include using the proper spraying techniques and equipment, taking account of weather conditions and the need to protect the environment.

This is an existing practice of the District, and is required to comply with the Department of Pesticide Regulation's (DPR) requirements and the terms of our California Department of Public Health (CDPH) Cooperative Agreement. All pesticide applicators receive annual safety and spill training in addition to their regular continuing education.

14. Website for Public Notice

Saddle Creek Community Services District uses websites to keep residence and interested parties informed about mosquito control.
District site: www.saddlecreekcsd.org

15. Pesticide Application Log

The Discharger shall maintain a log for each pesticide application. The application log shall contain, at a minimum, the following information, when practical, for larvicide or adulticide applications:

1. Date of application;
2. Location of the application and target areas (e.g., addresses, crossroads, or map coordinates);
3. Name of applicator;
4. The names of the water bodies treated if known/ named (i.e., canal, creek, lake, etc.);
5. Application details, such as when the application was made, pesticide application rate and concentration, surface water area, pesticide(s) and adjuvants used by the Discharger, and volume or mass of each component discharged.

This is an existing practice of the District as required to comply with DPR regulations and our CDPH Cooperative Agreement requirements. District control personnel complete daily inspections/treatments that are kept for 10 years.

References:

Best Management Practices for Mosquito Control in California. 2010. Available from the California Department of Public Health—Vector-Borne Disease Section, (916) 552-9730 or by download from http://www.westnile.ca.gov/resources.php under the heading Mosquito Control and Repellent Information.

California Mosquito-borne Virus Surveillance and Response Plan 2010. [Note: this document is updated annually by CDPH]. Available from the California Department of Public Health Vector-Borne Disease Section, (916) 522-9730 or by download from http://www.westnile.ca.gov/resources.php under the heading Mosquito Control and Repellent information.

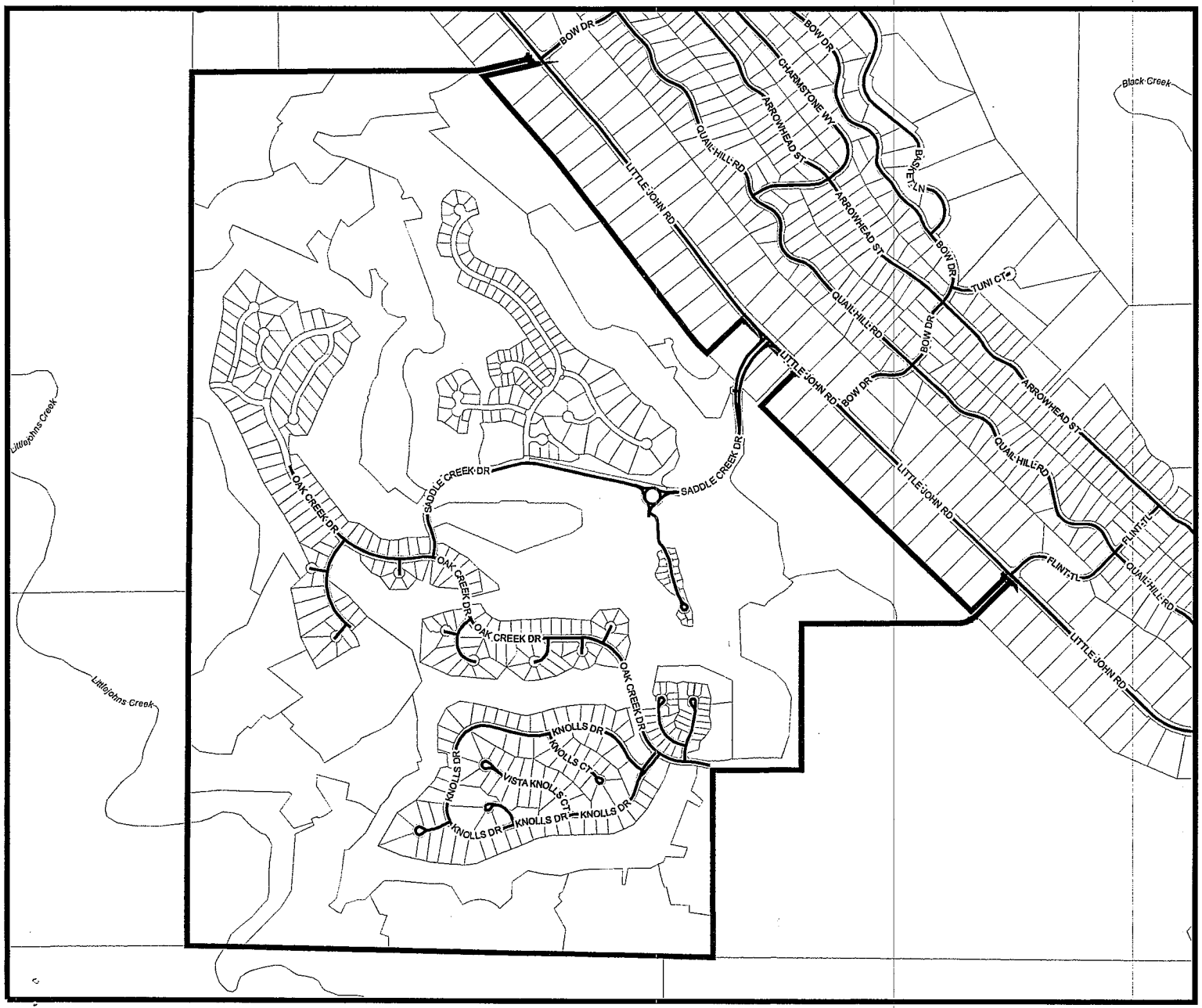
MVCAC NPDES Coalition Monitoring Plan. [In development at the time of this draft]

ATTACHMENT E – LIST OF PERMITTED ADULTICIDE PRODUCTS

Product Name	Registration Number
Pyrocide Mosquito Adulticiding Concentrate for ULV Fogging 7395	1021-1570
Evergreen Crop Protection EC 60-6	1021-1770
Pyrenone Crop Spray	432-1033
Prentox Pyronyl Crop Spray	655-489
Pyrocide Mosquito Adulticiding Concentrate for ULV Fogging 7396	1021-1569
Aquahalt Water-Based Adulticide	1021-1803
Pyrocide Mosquito Adulticide 7453	1021-1803
Pyrenone 25-5 Public Health Insecticide	432-1050
Prentox Pyronyl Oil Concentrate #525	655-471
Prentox Pyronyl Oil Concentrate or 3610A	655-501
Permanone 31-66	432-1250
Kontrol 30-30 Concentrate	73748-5
Aqualuer 20-20	769-985
Aqua-Reslin	432-796
Aqua-Kontrol Concentrate	73748-1
Kontrol 4-4	73748-4
Biomist 4+12 ULV	8329-34
Permanone RTU 4%	432-1277
Prentox Perm-X UL 4-4	655-898
Allpro Evoluer 4-4 ULV	769-982
Biomist 4+4	8329-35
Kontrol 2-2	73748-3
Scourge Insecticide with Resmethrin/Piperonyl Butoxide 18%+54% MF Formula II	432-667
Scourge Insecticide with Resmethrin/Piperonyl Butoxide 4%+12% MF Formula II	432-716
Anvil 10+10 ULV	1021-1688
AquaANVIL Water-based Adulticide	1021-1807
Duet Dual-Action Adulticide	1021-1795
Anvil 2+2 ULV	1021-1687
Zenivex E20	2724-791
Trumpet EC Insecticide	5481-481
Fyfanon ULV Mosquito	67760-34

ATTACHMENT F – LIST OF PERMITTED LARVICIDE PRODUCTS

Product Name	Registration Number
Vectolex CG Biological Larvicide	73049-20
Vectolex WDG Biological Larvicide	73049-57
Vectolex WSP Biological Larvicide	73049-20
Vectobac Technical Powder	73049-13
Vectobac-12 AS	73049-38
Aquabac 200G	62637-3
Teknar HP-D	73049-404
Vectobac-G Biological Mosquito Larvicide Granules	73049-10
Vectomax CG Biological Larvicide	73049-429
Vectomax WSP Biological Larvicide	73049-429
Vectomax G Biological Larvicide/Granules	73949-429
Zoecon Altosid Pellets	2724-448
Zoecon Altosid Pellets	2724-375
Zoecon Altosid Liquid Larvicide Mosquito Growth Regulator	2724-392
Zoecon Altosid XR Entended Residual Briquets	2724-421
Zoecon Altosid Liquid Larvicide Concentrate	2724-446
Zoecon Altosid XR-G	2724-451
Zoecon Altosid SBG Single Brood Granule	2724-489
Mosquito Larvicide GB-1111	8329-72
BVA 2 Mosquito Larvicide Oil	70589-1
BVA Spray 13	55206-2
Agnique MMF Mosquito Larvicide & Pupicide	53263-28
Agnique MMF G	53263-30
Abate 2-BG	8329-71
5% Skeeter Abate	8329-70
Natular 2EC	8329-82
Natular G	8329-80
Natular XRG	8329-83
Natular XRT	8329-84



Calaveras County Community Service District (Saddle Creek)

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Legend

Community Service Districts

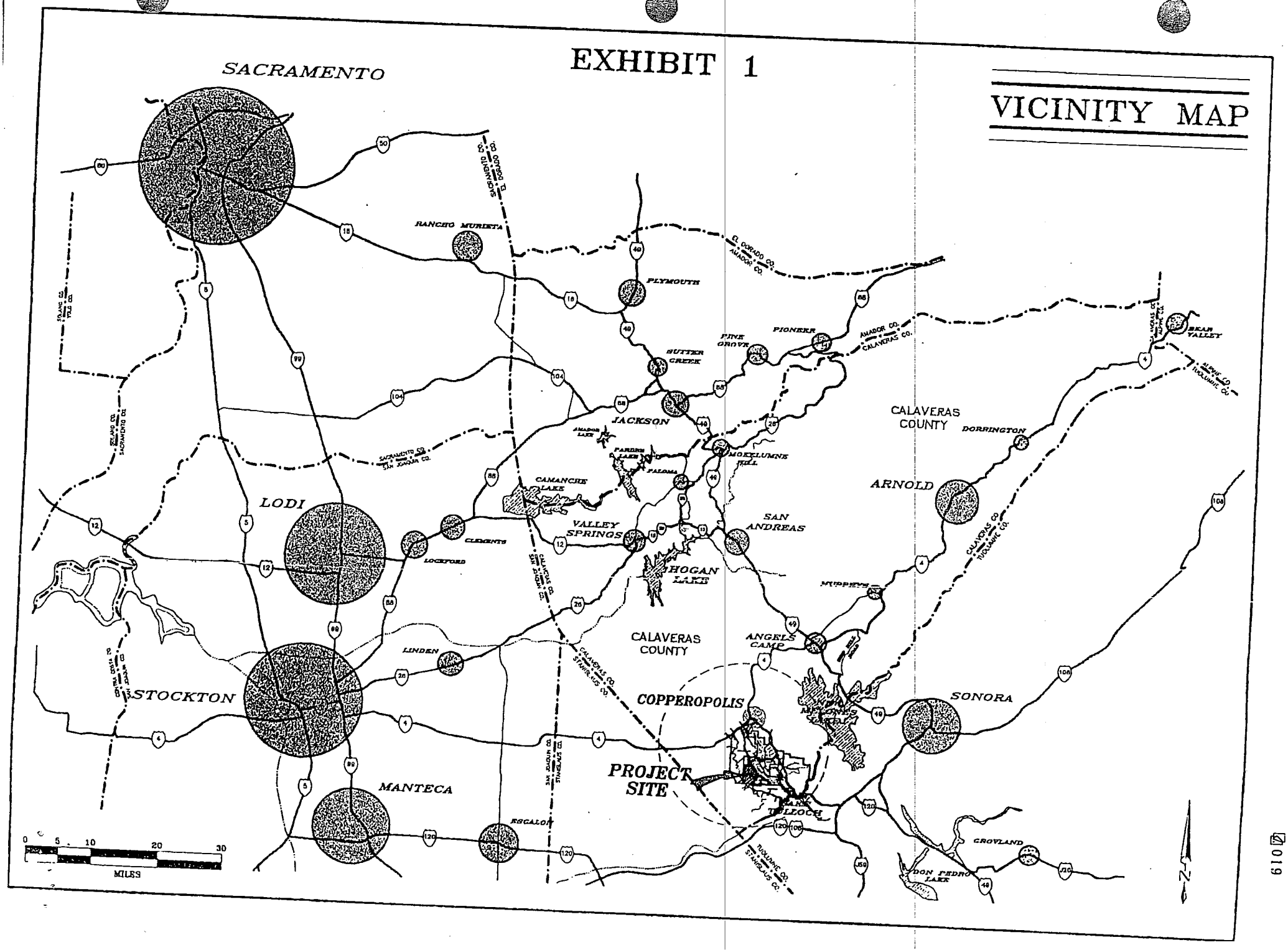
- Saddle Creek
- Parcels
- Roads
- Highways
- Main Creeks
- Lakes

All district boundaries are generalized and are not to be used on a parcel by parcel basis.

Map Design and Cartography
By Calaveras County GIS
San Andreas, CA 95249
Sept, 2005

0.07 0.035 0 0.07 0.14 0.21 0.28
Miles

EXHIBIT 1


VICINITY MAP
SACRAMENTO
RANCHO MURIETA
PLYMOUTH
SUTTER CREEK
PINE GROVE
PIONEER
BEAR VALLEY
JACKSON
CALAVERAS COUNTY
DORRINGTON
ARNOLD
MOKELUMNE HILL
CAMANCHE LAKE
VALLEY SPRINGS
SAN ANDREAS
HOGAN LAKE
LODI
CLEMENTS
LOCKFORD
LINDEN
STOCKTON
CALAVERAS COUNTY
ANGELS CAMP
COPPEROPOLIS
SONORA
PROJECT SITE
MANTECA
ESCALON
TULLOCH
GROVLAND
DON PEDRO LAKE
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MILES
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