

Central Valley Regional Water Quality Control Board

14 February 2024

David Guy, President
Northern California Water Association
455 Capitol Mall, Suite 703
Sacramento, CA 95814

APPROVAL OF THE SACRAMENTO VALLEY WATER QUALITY COALITION REQUEST TO CEASE MONITORING AND REPORTING ON CHLORPYRIFOS AND MODIFY MONITORING AND REPORTING ON DIAZINON

Thank you for submitting your 24 July 2023 letter to the Central Valley Water Quality Control Board proposing reductions to the current Chlorpyrifos and Diazinon Total Maximum Daily Load (TMDL) monitoring and reporting.

Staff reviewed the proposed monitoring and reporting reductions. Based on the attached staff memo, I approve your request to discontinue chlorpyrifos monitoring on the Sacramento and Feather Rivers, target diazinon monitoring at the TMDL sites per the Pesticide Evaluation Protocol selection for diazinon monitoring in the upstream tributary areas and reduce the content of the TMDL Annual Report. The Central Valley Water Board appreciates your role in reducing exceedances of chlorpyrifos and diazinon in the Sacramento and Feather River monitoring locations even before the chlorpyrifos ban.

If you have any questions or comments regarding the review, or need any further information, please contact Victor Bautista at victor.bautista@waterboards.ca.gov or (530) 226-3458.

Sincerely,

Adam Laputz 
Digitally signed by Adam Laputz
Date: 2024.02.16 10:48:17 -08'00'

Patrick Pulupa

Enclosures: Staff Memo

Central Valley Regional Water Quality Control Board

TO: Petra Lee
Senior Environmental Scientist
Monitoring and Implementation Unit
Irrigated Lands Regulatory Program

FROM: Victor Bautista
Environmental Scientist
Monitoring and Implementation Unit
Irrigated Lands Regulatory Program

DATE: 9 February 2024

SUBJECT: REQUEST TO CEASE MONITORING AND REPORTING ON
CHLORPYRIFOS AND MODIFY MONITORING AND REPORTING ON
DIAZINON: SACRAMENTO VALLEY WATER QUALITY COALITION

The Sacramento Valley Water Quality Coalition (Coalition) is implementing a monitoring and reporting program to assess compliance with the diazinon and chlorpyrifos Total Maximum Daily Load (TMDL) requirements for the Sacramento and Feather Rivers and the Sacramento-San Joaquin Delta. According to the Water Quality Control Plan for the Sacramento River and San Joaquin River Basins (Basin Plan), compliance with the diazinon and chlorpyrifos loading capacity and load allocation was required by 1 December 2010.

To determine compliance with the numeric water quality objectives and the loading capacity in the Sacramento and Feather Rivers, the Coalition monitored fourteen sites from January 2009 to September 2020. The number of sites was reduced to five following the implementation of the Pesticide Evaluation Protocol and the Delta Regional Monitoring Program in 2018. The approved monitoring reductions removed non-Representative, Representative, and Integration sites that did not carry an active Management Plan for chlorpyrifos and diazinon. There are no active management plans for chlorpyrifos and diazinon in the Coalition area.

Monitoring Results

Based on the results of the Coalition monitoring program, the chlorpyrifos and diazinon WQOs for the Sacramento and Feather Rivers and Sacramento-San Joaquin Delta have been achieved since TMDL sampling started in 2009. Additionally, the loading capacity has also been achieved since the last diazinon exceedance at the Gilsizer Slough site in March 2020. The load allocation for chlorpyrifos and diazinon for the tributaries discharging into the Sacramento River has been met for 99% of samples collected since the 2019 WY (Table 1). The Coalition also noted that no chlorpyrifos or

MARK BRADFORD, CHAIR | PATRICK PULUPA, ESQ., EXECUTIVE OFFICER

diazinon were detected in samples collected from the TMDL monitoring sites for the 2021 and 2022 WYs.

Table 1. Tally totals of chlorpyrifos TMDL load allocation compliance rate (total of fourteen sites) since the inception of TMDL monitoring (January 2009 through September 2022).

	In Compliance	Out of Compliance	Samples	Compliance
2009	45	1	46	97.83%
2010	46	4	50	92.00%
2011	97	7	104	93.27%
2012	85	2	87	97.70%
2013	87	2	89	97.75%
2014	76	4	80	95.00%
2015	80	5	85	94.12%
2016	29	2	31	93.55%
2017	36		36	100.00%
2018	43	1	44	97.73%
2019	57		57	100.00%
2020	31		31	100.00%
2021	6		6	100.00%
2022	5		5	100.00%
Grand Total	723	28	751	96.27%

Table 2. Tally totals of diazinon TMDL load allocation compliance rate (total of fourteen sites) since the inception of TMDL monitoring (January 2009 through September 2022).

	In Compliance	Out of Compliance	Samples Collected	Compliance (%)
2009	45	1	46	97.83%
2010	50		50	100.00%
2011	102	2	104	98.08%
2012	87		87	100.00%
2013	87	2	89	97.75%
2014	80		80	100.00%
2015	85		85	100.00%
2016	31		31	100.00%
2017	35	1	36	97.22%
2018	32	1	33	96.97%
2019	28		28	100.00%
2020	34	1	35	97.14%
2021	13		13	100.00%
2022	14		14	100.00%
Grand Total	723	8	731	98.91%

Since the beginning of the 1 January 2021 chlorpyrifos ban by California Department of Pesticide Regulation, the Pesticide Use Report data indicates only one-pound active ingredient of chlorpyrifos was used in 2021, presumably applied by a grower unaware of the ban; however, diazinon use has remained steady in the Coalition area with no clear increasing or decreasing trends. For example, 28,1991 lbs. active ingredient of diazinon were applied during the 2021 WY across the Coalition area, which is slightly greater than the 2010 – 2021 average of 27,635 lbs. active ingredient of diazinon applied per year.

Monitoring Reduction

The Coalition proposes to discontinue chlorpyrifos monitoring at all TMDL sites and target diazinon monitoring at the TMDL sites only if diazinon monitoring is required at the upstream tributary sites per the Waste Discharge Requirements (WDR) and Pesticide Evaluation Protocol (PEP) during the triennially occurring Assessment year. Diazinon monitoring will remain the same due to the Coalition's participation in the Delta Regional Monitoring Program (DRMP). The Coalition also requested to reduce the content of their TMDL Report that will be submitted on 1 May 2026 (based on the 2025 water year monitoring) since no additional data of chlorpyrifos is anticipated to be collected. The Coalition suggested two submittal options for the reporting reduction:

1. *The TMDL Compliance Reporting section of the Coalition's annual Management Plan Progress Report would be expanded to include annual diazinon data interpretation and a triennial update to the Coalition's evaluation of compliance with load allocations in TMDL receiving water bodies. The triennial update would occur following an Assessment Monitoring year, which occurs every three years; or*
2. *Continue to prepare the Coalition's TMDL Report with the following changes: (1) the report is only prepared every three years (as compared to every two years); specifically, the report would be prepared following an Assessment Monitoring year; and (2) the report would only be updated with respect to new diazinon data collected since the preparation of the last TMDL Report.*

Staff Recommendations

The recent ban on chlorpyrifos use and the ILRP Monitoring and Reporting requirement to target pesticide monitoring through the PEP process justify the Coalition's request to discontinue chlorpyrifos monitoring at all TMDL sites. The lack of decreasing or increasing trends in diazinon use in the Coalition area and the 2020 diazinon exceedance support targeting of diazinon monitoring at the TMDL sites based on the WDR and PEP selection for diazinon monitoring in the upstream tributary areas. Staff does not object to either of the Coalition's suggested diazinon reporting options, if the Coalition continues to participate in the DRMP and the monitoring results and outcomes of actions taken to meet the seven objectives described in the Basin Plan are properly addressed in the 2026 submittal.