



Central Valley Regional Water Quality Control Board

27 November 2024

David Halopoff
Cawelo Water District Coalition
17207 Industrial Farm Road
Bakersfield, CA 93308

CONDITIONAL APPROVAL OF CAWELO WATER DISTRICT COALITION PESTICIDE MONITORING PROPOSAL FOR THE 2025 CALENDAR YEAR

Thank you for your submittal of Cawelo Water District Coalition's 2025 Calendar Year Pesticide Evaluation Protocol Proposal (Proposal), dated 4 November 2024. The proposed pesticides and schedules for surface water monitoring were identified based on guidance provided in the Pesticide Evaluation Protocol, as required by the Monitoring and Reporting Program for Waste Discharge Requirements General Order R5-2013-0120-09.

Based on the enclosed staff memorandum, the proposed monitoring constituents and schedule were appropriately identified, except for copper. I am approving the proposal under the condition that the monitoring schedule for Poso Creek at Zerker Road (ALT) is revised to include copper for monitoring in April.

The enclosed memorandum provides additional details regarding staff's review of the 2025 Proposal. If you have any questions regarding this letter, please contact Christine Johnson at (559) 445-6051, or by email at Christine.Johnson@waterboards.ca.gov.

A handwritten signature in blue ink, appearing to read "Patrick Pulupa".

For Patrick Pulupa
Executive Officer

Enclosure: Staff Review of Cawelo Water District Coalition's
Pesticide Evaluation Protocol Proposal for the 2025 Calendar Year

Central Valley Regional Water Quality Control Board

TO: Eric Warren, PE
Senior Water Resource Control Engineer
IRRIGATED LANDS REGULATORY PROGRAM

FROM: Christine Johnson
Environmental Scientist
IRRIGATED LANDS REGULATORY PROGRAM

DATE: 27 November 2024

SUBJECT: REVIEW OF THE CAWELO WATER DISTRICT COALITION SURFACE WATER PESTICIDE EVALUATION PROTOCOL PROPOSAL – 2025 CALENDAR YEAR UPDATE

On 4 November 2024, the Cawelo Water District Coalition (Coalition) submitted a Pesticide Evaluation Protocol Proposal (Proposal) to the Central Valley Water Board. Monitoring Proposals are submitted annually in accordance with the Monitoring and Reporting Program (MRP) for Waste Discharge Requirements General Order R5-2013-0120-09. The Proposal identifies the constituents and schedule for pesticide monitoring at designated surface water monitoring sites from 1 January 2025 through 31 December 2025.

Staff reviewed the Proposal to determine compliance with the requirements of the MRP. A summary of the main elements of the monitoring proposal is provided below, followed by staff comments and recommendations.

2025 MONITORING PLAN UPDATE SUMMARY

Monitoring Sites, Parameters, and Schedule

Pesticide monitoring is scheduled at three surface water monitoring stations for the 2025 annual year:

1. Poso Creek at Zerker Rd (ALT)
2. Poso Creek at Hwy 99
3. Poso Creek at Hwy 65

The constituents selected for monitoring were determined using three years of Pesticide Use Report data (2020-2022) as required by the Pesticide Evaluation Protocol (PEP). Pesticide application records for the watersheds were filtered to only chemicals included in the Executive Officer List of Pesticides for Consideration (Attachment A, PEP). Application records for the three surface water monitoring stations were organized

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

according to the pesticide groups provided in the Protocol and assessed relative to aquatic life and human health reference values.

Pesticides applied within the watershed areas were excluded from monitoring based on factors including environmental fate and transport properties (e.g., high volatility), calculation of an aquatic life risk ratio of less than 50 or human health risk ratio of less than 10, or the absence of commercially available analytical methods.

STAFF COMMENTS AND RECOMMENDATIONS

Water Board Staff noted an error with step 7C. of the PEP in the monitoring proposal for Poso Creek at Zerker Road (ALT). Step 7C. indicates to “*Prioritize and include pesticides in the monitoring plan using the following criteria: [...] Pesticides with detections greater than 10% of the reference value, unless sampling frequency during vulnerable time periods has been sufficient to capture peak concentrations or there is evidence to demonstrate that values above 10% are an error (e.g. typographical or laboratory error).*” For Poso Creek at Zerker Road (ALT), past detections for copper in April are greater than 10% of the aquatic life reference value. This would therefore cause copper to be included in the Poso Creek at Zerker Road (ALT) monitoring proposal for April.

The Proposal executed the steps outlined in the PEP and complies with the requirements of the MRP. Staff recommends approval of the Proposal for pesticide monitoring from 1 January 2025 through 31 December 2025 with the condition that copper is added for monitoring in April at Poso Creek at Zerker Road (ALT).