

Central Valley Regional Water Quality Control Board

6 October 2023

Tim Ashlock
Buena Vista Coalition
525 N. Main Street
Buttonwillow, CA 93206

APPROVAL OF THE BUENA VISTA COALITION 2024 WATER YEAR PESTICIDE EVALUATION PROTOCOL PROPOSAL

Thank you for submitting the 2024 Water Year Pesticide Evaluation Protocol Proposal (Proposal) for the Buena Vista Coalition. The proposed pesticides and schedules for surface water monitoring were identified based on guidance provided in the Pesticide Evaluation Protocol (PEP), as required by section III.B.2 of the Monitoring and Reporting Program (MRP) Attachment B to Order R5-2013-0120-09 (Order).

Based on the attached staff memorandum, the monitoring schedule complies with the MRP requirements, except for acetamiprid, cyprodinil, pyraclostrobin, and pyrethrins monitoring. I am approving the Proposal under the condition that the monitoring schedule is revised to include these four pesticides.

If you have any questions regarding this approval letter, please contact Yared Kebede by email at Yared.Kebede@waterboards.ca.gov.

Sincerely,

Adam Laputz
Digitally signed by Adam Laputz
Date: 2023.10.06 10:30:47 -07'00'

Patrick Pulupa
Executive Officer

Enclosure: Staff Review of the 2023 Water Year Proposal.

Central Valley Regional Water Quality Control Board

TO: Petra Lee
Senior Environmental Scientist
Irrigated Lands Regulatory Program

FROM: Yared Kebede
Environmental Scientist
Irrigated Lands Regulatory Program

DATE: 4 October 2023

SUBJECT: REVIEW OF THE BUENA VISTA COALITION PESTICIDE EVALUATION
PROTOCOL PROPOSAL – 2024 WATER YEAR UPDATE

The Central Valley Water Board received the Buena Vista Coalition (Coalition) revised Pesticide Evaluation Protocol Proposal (Proposal) on 1 August 2023. The proposal identifies the constituents and schedule for pesticide monitoring in surface water from 1 October 2023 through 30 September 2024.

Staff reviewed the Proposal to determine compliance with the requirements pursuant to section III. B.2. of the Monitoring and Reporting Program (MRP) Attachment B to Order R5-2013-0120-09 (Order). A summary of the main elements of the proposed monitoring proposal is provided below, followed by staff recommendation.

1. Monitoring Sites, Parameters, and Schedule

The constituents selected for monitoring were determined using three years of Pesticide Use Report (PUR) data (2019-2021), as required by the Pesticide Evaluation Protocol. Pesticides that were not applied within the Coalition area were removed from consideration. Degradates were then added to the list of pesticides under consideration and pesticides with the same toxicant in water were grouped for evaluation of the aquatic life risk ratio.

Pesticides applied within the sub-watershed were excluded from monitoring based on factors including environmental fate and transport properties such as high volatility, calculation of an aquatic life risk ratio of less than 50, and no commercially available analytical methods. The human health risk ratios were not determined because the Buena Vista monitoring locations (“Valley Floor Waters”) are not designated as having Municipal and Domestic Supply (MUN) beneficial use in the Water Quality Control Plan for the Tulare Lake Basin.

2. Staff Comments

The Coalition proposed to exclude pesticides from monitoring if “only one Environmental Laboratory Accreditation Program (ELAP) accredited laboratory offers the analysis, regardless of the number of non-accredited laboratories offering the analysis”. This led to the proposed exclusion of pesticides from monitoring because the PEP requires availability of commercial analytical methods that can be performed by multiple laboratories. Neither the Order nor the PEP stipulate that pesticide analyses must be conducted using an ELAP accredited method. Therefore, the Proposal should be revised to include monitoring for acetamiprid, cyprodinil, pyraclostrobin, and pyrethrins.

3. Staff Recommendation

The Proposal successfully executed the steps outlined in the Pesticides Evaluation Protocol and complies with the requirements of the MRP. Staff recommends approval of the Proposal for pesticide monitoring from 1 October 2023 through 30 September 2024 with the condition that monitoring for acetamiprid, cyprodinil, pyraclostrobin, and pyrethrins monitoring are scheduled. There are commercially available analytical methods for these pesticides, and ELAP accreditation is unnecessary.