



Central Valley Regional Water Quality Control Board

10 October 2024

David DeGroot
Tule Basin Water Quality Coalition
324 South Santa Fe Street, Suite A
Visalia, CA 93292

CONDITIONAL APPROVAL OF TULE BASIN WATER QUALITY COALITION PESTICIDE MONITORING PROPOSAL FOR THE 2025 WATER YEAR

Thank you for your submittal of Tule Basin Water Quality Coalition's 2025 Water Year Pesticide Evaluation Protocol Proposal (Proposal), dated 24 September 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 2,4-D acids & salts and Dichlorvos. I am approving the proposal under the condition that the monitoring schedule for Deer Creek at Road 120 is revised to include 2,4-D acids & salts during February and December and Dichlorvos in July.

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 that reads "Christine Johnson".

For Patrick Pulupa
Executive Officer

Enclosure: Staff Review of Tule Basin Water Quality Coalition's
Pesticide Evaluation Protocol Proposal for the 2025 Water 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: 10 October 2024

**SUBJECT: REVIEW OF THE TULE BASIN WATER QUALITY COALITION'S
SURFACE WATER PESTICIDE EVALUATION PROTOCOL PROPOSAL –
2025 WATER YEAR UPDATE**

On 24 September 2024, the Tule Basin Water Quality 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 October 2024 through 30 September 2025.

Central Valley Water Board 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 seven surface water monitoring stations for the 2025 water year:

1. Tule River at Road 92
2. Tule River at Road 144
3. Porter Slough Near Road 192
4. Deer Creek at Road 120
5. Deer Creek at Road 176
6. Deer Creek at Road 248
7. White River at Road 208

The constituents selected for monitoring were determined using three years of Pesticide Use Report data (2021-2023) 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 seven surface water monitoring stations were organized 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, the absence of commercially available analytical methods, or a monthly use percentage of less than ten percent. In addition, the coalition indicated that Copper and Zinc were removed from the list as these pesticides are part of the core constituents already designated for monitoring under the Coalition's Surface Water Monitoring Plan (SWMP).

STAFF COMMENTS AND RECOMMENDATIONS

Central Valley Water Board Staff noted an error with step 1F. of the Pesticide Evaluation Process in both the monitoring proposals of Deer Creek at Road 120 and White River at Road 208. Step 1F. of the Pesticide Evaluation Process indicates to *"Group pesticides with the same toxicant in water according to the grouping list provided (Attachment B)."* For Deer Creek at Road 120, 2,4-D Dimethylamine Salt is grouped into 2,4-D acids & salts. Once grouped, 2,4-D acids & salts has an aquatic life reference value of 13.1. This would cause monitoring to be triggered at Deer Creek at Road 120 for 2,4-D acids & salts in February and December.

In addition, the Coalition's proposal indicated monitoring for Cyfluthrin in April at White River at Road 208. Beta-Cyfluthrin and Cyfluthrin are grouped into Cyfluthrin at Step 1F. Once grouped, Cyfluthrin has an aquatic life reference value of 0.0002. This would cause the monthly use to be less than ten percent and thus monitoring for Cyfluthrin in April would not be necessary.

Furthermore, Central Valley Water Board staff noted that Dichlorvos was not included for monitoring in July at Deer Creek at Road 120. The Coalition indicated in Appendix A that Dichlorvos does not have an analytical method. This error resulted from naming Dichlorvos (DDVP) instead of Dichlorvos in the aquatic life tab which caused it to not be pulled from the Analysis method tab in the Appendix A Excel workbook. Dichlorvos does have an analysis method and therefore should be included in the Deer Creek at Road 120 Monitoring Proposal for July.

The Proposal executed the steps outlined in the Pesticide Evaluation Protocol and complies with the requirements of the MRP. Staff recommends approval of the Proposal for pesticide monitoring from 1 October 2024 through 30 September 2025 with the condition that 2,4-D acids & salts is added for monitoring in February and December at

Deer Creek at Road 120 and that Dichlorvos is added for monitoring in July at Deer Creek at Road 120.