

ATTACHMENT G – NOTICE OF INTENT

**WATER QUALITY ORDER NO. 2011-0002-DWQ
GENERAL PERMIT NO. CAG 990004**

**STATEWIDE NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM PERMIT
FOR BIOLOGICAL AND 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 CONTRA COSTA MOSQUITO + VECTOR CONTROL DISTRICT			
B. Mailing Address 155 MASON CIRCLE			
C. City CONCORD	D. County CONTRA COSTA	E. State CA	F. Zip Code 94520
G. Contact Person CRAIG DOWNS	H. Email address cdowns@ contracostamosquito.com	I. Title GENERAL MANAGER	J. Phone 925.685.9301

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. Biological and residual pesticides discharge to (check all that apply)*:

1. Canals, ditches, or other constructed conveyance facilities owned and controlled by Discharger.
 Name of the conveyance system: _____

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: potentially all water bodies in Contra Costa County

* 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 2,5
(List all regions where pesticide application is proposed.)

A map showing the locations of A1-A3 in each Regional Water Board shall be included.

V. PESTICIDE APPLICATION INFORMATION

A. Target Organisms: Vector Larvae Adult Vector

B. Pesticides Used: List name, active ingredients and, if known, degradation by-products
Potentially all permitted products listed in Attachments E & F of order NO. 2011-0002-DWQ

C. Period of Application: Start Date Jan 1 (annually) End Date Dec 31 (annually)

D. Types of Adjuvants Added by the Discharger: none

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

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

VIII. FEE

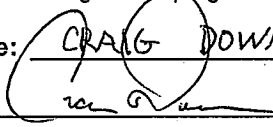
Have you included payment of the filing fee (for first-time enrollees only) with this submittal?

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."

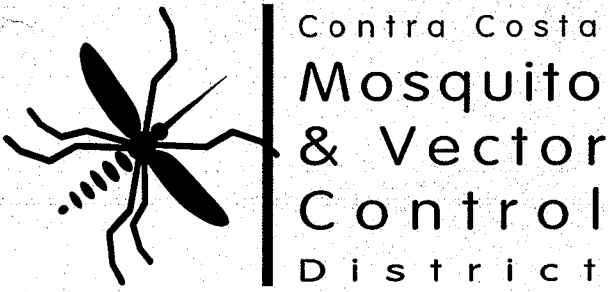
A. Printed Name: CRAIG DOWNS

B. Signature:  Date: _____

C. Title: GENERAL MANAGER

X. FOR STATE WATER BOARD USE ONLY

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



Pesticides Application Plan (PAP) – June 2011

- 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;**
Map attached (Appendix 1). Potential target area includes all areas within the boundaries of Contra Costa County, and Roe and Ryer Islands (Solano County)
- 2. Discussion of the factors influencing the decision to select pesticide applications for mosquito control;**
Please see the Best Management Practices for Mosquito Control in California and appendix 2, Contra Costa MVCD Annual Environmental Audit 2010.
- 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 appendix 2, pgs 14-15. Products may be applied by hand, truck, backpack, hand can, helicopter, or airplane according to label directions.
- 4. Description of ALL the application areas* and the target areas in the system that are being planned to 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 affect long-term solutions to reduce or eliminate the need for continued applications as described in Best Management Practices for Mosquito Control in California. The typical sources treated by this District include:
Artificial containers, catch basins, channels, intermittent water (rainwater or irrigation water), marshes, ponds, swimming pools, tree holes throughout Contra Costa County (Appendix 1)

* Asterisks indicate terms that are defined in Attachment A of the NPDES Permit for Vector Control

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

With any source of mosquitoes or other vectors, the District's first goal is to look for ways to eliminate the source, or if that is not possible, for ways to reduce the potential for vectors. The most commonly used methods and their limitations are included in the Best Management Practices for Mosquito Control in California. Specific methods used by the District include stocking mosquito fish (*Gambusia affinis*), educating residents that mosquitoes develop in standing water and encouraging them to remove sources of standing water on their property, and working with property owners to find long-term water management strategies that meet their needs while minimizing the need for public health pesticide applications.

6. How much product is needed and how this amounts was determined;

The need to apply product is determined by surveillance. Actual use varies annually depending on the mosquito activity (see appendix 2, pgs 14-15). Other public health pesticides in addition to those listed below may be used as part of the District's best management practices.

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

Please see the MVCAC NPDES Coalition Monitoring Plan

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

Please see the Best Management Practices for Mosquito Control in California and appendix 2.

9. Description of the BMPs to be implemented. The BMPs shall include at a minimum:

The District's BMPs are described in the Best Management Practices for Mosquito Control in California, the California Mosquito-borne Virus Surveillance and Response Plan and in appendix 2. Specific elements have been highlighted below under items a-f.

a. measures to prevent pesticide spill;

All pesticide applicators receive annual spill prevention and response training. District employees ensure daily that application equipment is in proper working order. Spill mitigation devices are placed in all vehicles and pesticide storage areas.

b. measures to ensure that only a minimum and consistent amount is used

Application equipment is calibrated at least annually as required by the Department of Pesticide Regulations (DPR) and the terms of a cooperative agreement with the California Department of Public Health (CDPH).

c. a plan to educate Coalition's or Discharger's staff and pesticide applicator on any potential adverse effects to waters of the U.S. from the pesticide application;

This will be included in our pesticide applicators annual pesticide application and safety training, continuing education programs, and/or regional NPDES Permit training programs.

d. descriptions of specific BMPs for each application mode, e.g. aerial, truck, hand, etc.;

The Contra Costa Mosquito & Vector Control District calibrates truck-mounted and handheld larviciding equipment each year to meet application specifications. Supervisors review application records daily to ensure appropriate amounts of material are being used. Ultra-low volume (ULV) application equipment is calibrated for output and droplet size to meet label requirements. Aerial larviciding equipment is calibrated by the Contractor. Aerial adulticide equipment is calibrated regularly and droplet size will be monitored by the District to ensure droplets meet label requirements. Airplanes used in urban ULV applications and the primary airplane used for rural ULV application is equipped with advanced guidance and drift management equipment to ensure the best available technology is being used to place product in the intended area. If a secondary airplane is used in rural ULV applications it will be equipped with an advanced guidance system.

e. descriptions of specific BMPs for each pesticide product used; and

Please see the Best Management Practices for Mosquito Control in California and appendix 2 for general pesticide application BMPs, and the current approved pesticide labels for application BMPs for specific products.

f. descriptions of specific BMPs for each type of environmental setting (agricultural, urban, and wetland).

Please see the Best Management Practices for Mosquito Control in California.

10. Identification of the problem. Prior to first pesticide application covered under this General Permit that will result in a discharge of biological and residual pesticides to waters of the US, and at least once each calendar year thereafter prior to the first pesticide application for that calendar year, the Discharger must do the following for each vector management area:

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

The Contra Costa Mosquito & Vector Control District staff only apply pesticides to sources of mosquitoes that represent imminent threats to public health or quality of life. 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 one or more of the following criteria:

- Mosquito species present
- Mosquito stage of development

- Pest, nuisance, or disease potential
- Disease activity
- Mosquito abundance
- Flight range
- Proximity to populated areas
- Size of source
- Presence/absence of natural enemies or 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; and

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 as described in Best Management Practices for Mosquito Control in California.

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

This is included in the Best Management Practices for Mosquito Control in California and the California Mosquito-borne Virus Surveillance and Response Plan that the Districts uses. The District continually collects adult and larval mosquito surveillance data, dead bird reports, and sentinel chicken test results and uses these data to guide mosquito control activities.

11. Examination of Alternatives. Dischargers shall continue to examine alternatives to pesticide use in order to reduce the need for applying larvicides that contain temephos and for spraying adulticides. Such methods include:

a. Evaluating the following management options, in which the impact to water quality, impact to non-target organisms, vector resistance, feasibility, and cost effectiveness should be considered:

- No action
- Prevention
- Mechanical or physical methods
- Cultural methods
- Biological control agents
- Pesticides

If there are no alternatives to pesticides, dischargers shall use the least amount of pesticide necessary to effectively control the target pest.

The Contra Costa Mosquito & Vector Control District uses the principles and practices of integrated vector management (IVM) as described on pages 26 and 27 of Best Management Practices for Mosquito Control in California. As stated in item #10 above, locations where vectors may exist are assessed, and the potential for using alternatives to pesticides is determined on a case-by-case basis. Commonly considered alternatives include: 1) Eliminate artificial sources of standing water; 2) Ensure temporary sources of surface water drain within four days (96 hours) to prevent adult mosquitoes from developing; 3) Control plant growth in ponds, ditches, and shallow wetlands; 4) Design facilities and water conveyance and/or holding structures to minimize the potential for producing mosquitoes; and 5) Use appropriate biological control methods that are available. Additional alternatives to using pesticides for managing mosquitoes are listed on pages 4-19 of the Best Management Practices for Mosquito Control in California.

Implementing preferred alternatives depends a variety of factors including availability of agency resources, cooperation with stakeholders, coordination with other regulatory agencies, and the efficacy of the alternative. If a pesticide-free alternative does not sufficiently reduce the risk to public health, pesticides are considered, beginning with the least amount necessary to effectively control the target vector.

b. Applying pesticides only when vectors are present at a level that will constitute a nuisance.

Contra Costa Mosquito & Vector Control District follows an existing integrated vector management (IVM) program which includes practices described in the California Mosquito-borne Virus Surveillance and Response Plan and Best Management Practices for Mosquito Control in California.

A “nuisance” is specifically defined in California Health and Safety Code (HSC) §2002(j). This definition allows vector control agencies to address situations where even a low level of vectors may pose a substantial threat to public health. In practice, the definition of a “nuisance” is generally only part of a decision to apply pesticides to areas covered under this permit. As summarized in the California Mosquito-borne Virus Surveillance and Response Plan, the overall risk to the public when vectors and/or vector-borne disease are present is used to select an available and appropriate material, rate, and application method to address that risk in the context of our IVM program.

12. 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 right spraying techniques and equipment, taking account of weather conditions and the need to protect the environment.

This is an existing practice of the Contra Costa Mosquito & Vector Control 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.

13. If applicable, specify a website where public notices, required in Section VIII.B, may be found.

ContraCostaMosquito.com

References:

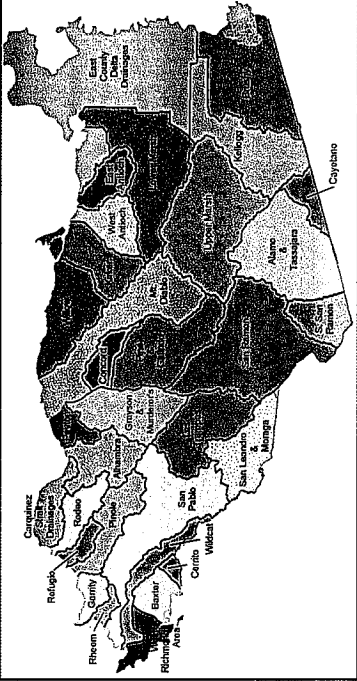
Best Management Practices for Mosquito Control in California. 2010. Available by download from the California Department of Public Health—Vector-Borne Disease Section at <http://www.westnile.ca.gov/resources.php> under the heading Mosquito Control and Repellent Information. Copies may be also requested by calling the California Department of Public Health—Vector-Borne Disease Section at (916) 552-9730 or the Contra Costa Mosquito & Vector Control District at 925.685.9301.

California Mosquito-borne Virus Surveillance and Response Plan. 2010. [Note: this document is updated annually by CDPH]. Available by download from the California Department of Public Health—Vector-Borne Disease Section at <http://www.westnile.ca.gov/resources.php> under the heading Response Plans and Guidelines. Copies may be also requested by calling the California Department of Public Health—Vector-Borne Disease Section at (916) 552-9730 or the Contra Costa Mosquito & Vector Control District at 925.685.9301.

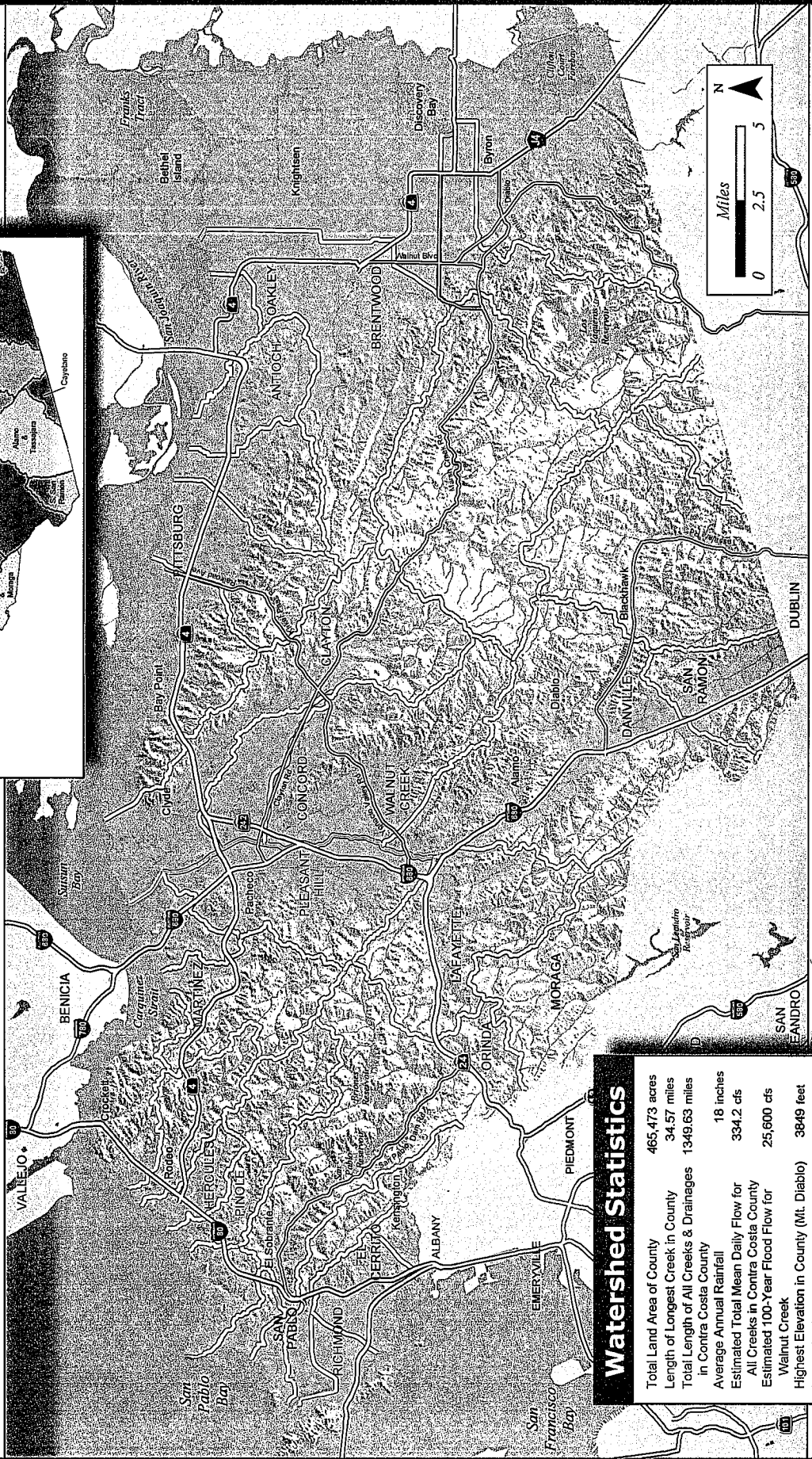
MVCAC NPDES Coalition Monitoring Plan. 2011.

Annual Environmental Audit, CCMVCD 2010.

Which watershed do you live in?



Contra Costa County has 32 major watersheds and sub-watersheds. All but eight of these are entirely within the county. While Walnut Creek Watershed is very large (93,336 acres) and spans many cities, many of the other watersheds are conveniently "community-sized". For instance Alhambra and Pinole Creeks are closely identified with (and are important features of) the Cities of Martinez and Pinole respectively.



Watershed Statistics

Total Land Area of County	465,473 acres
Length of Longest Creek in County	34.57 miles
Total Length of All Creeks & Drainages in Contra Costa County	1349.63 miles
Average Annual Rainfall	18 inches
Estimated Total Mean Daily Flow for All Creeks in Contra Costa County	334.2 cfs
Estimated 100-Year Flood Flow for Walnut Creek	25,600 cfs
Highest Elevation in County (Mt. Diablo)	3849 feet
Recognized Pollutants of Concern	Nitrogen, Mercury & Metals



155 Mason Circle
Concord, CA 94520
phone (925) 685-9301
fax (925) 685-0266
www.ccmvcd.dst.ca.us

Date: July 1, 2011

TO: Government Agencies in Contra Costa County

SUBJECT: **ANNUAL NOTICE OF INTENT TO APPLY PUBLIC HEALTH
PESTICIDES FOR VECTOR CONTROL PURPOSES WITHIN AND
ADJACENT TO CONTRA COSTA COUNTY**

1. Pursuant to the Statewide National Pollutant Discharge Elimination System Permit for Residual Pesticide Discharges to Waters of the United States from Vector Control Applications, as required under item VIII.B of the General Permit, it is the intent of the Contra Costa Mosquito & Vector Control District (CCMVCD) to apply pesticides in Contra Costa County.
2. A list of potential materials to be used are included. See attachment.
3. Mosquitoes are suppressed to protect the public from mosquito-borne diseases and pest mosquitoes.
4. Applications may occur anywhere in the county at any time of the year.
5. There are no known water use restrictions or precautions during treatment.
6. Interested persons may contact the district office at (925) 685-9301 to obtain additional information or visit our website www.ContraCostaMosquito.com

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Pinole KRISTIN HAEGELAND • Pittsburg RICHARD AINSLEY, PhD • Pleasant Hill RICHARD MEANS • San Pablo Vacant • San Ramon SHARYN ROSSI • Walnut Creek NANCY BROWNFIELD

Please see the following references regarding selection and use of pesticides in CCMVCD's program.

- a. Best Management Practices for Mosquito Control in California. 2010. California Department of Public Health, Vector-Borne Disease Section
- b. California Mosquito-Borne Virus Surveillance & Response Plan. 2010. California Department of Public Health, Vector-Borne Disease Section
- c. Operational Plan for Emergency Response to Mosquito-Borne Disease Outbreaks. 2010. California Department of Public Health, Vector-Borne Disease Section
- d. Overview of Mosquito Control Practices in California. 2008. California Department of Public Health, Vector-Borne Disease Section
- e. Epidemic/Epizootic West Nile Virus in the United States: Guidelines for Surveillance, Prevention and Control. 2003. U.S. Department of Health and Human Services, Centers for Disease Control and Prevention
- f. Contra Costa Mosquito & Vector Control District Mosquito-Borne Virus Surveillance & Response Plan. 2006.
- g. Pesticides and Public Health: Integrated Methods of Mosquito Management. 2001. U.S. Environmental Protection Agency

ATTACHMENT A – LIST OF PERMITTED ADULTICIDE PRODUCTS

Product Name	EPA Registration No.
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 B – LIST OF PERMITTED LARVICIDE PRODUCTS

Product Name	EPA Registration No.
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 Pellets Briquets	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
FourStar Briquets	83362-3
FourStar SBG	85685-1
Aquabac XT	62637-1
Spheratax SPH (50 G) WSP	84268-2
Spheratax SPH (50 G)	84268-2

cc: Contra Costa County
City of Antioch
City of Brentwood
Town of Clayton
City of Concord
Town of Danville
City of El Cerrito
City of Hercules
City of Lafayette
City of Martinez
Town of Moraga
City of Oakley
City of Orinda
City of Pinole
City of Pittsburg
City of Pleasant Hill
City of Richmond
City of San Pablo
City of San Ramon
City of Walnut Creek