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SACRAMENTO VALLEY
WATER QUALITY COALITION

Management of Chlorpyrifos and Diazinon Discharges to the Sacramento and Feather Rivers and the Sacramento-San Joaquin Delta: 2016 TMDL Compliance Monitoring Report

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Appendix B: Delta Regional Monitoring Program Participation Approval Letter for Reduced Individual Monitoring (February 26, 2016)

Appendix C: Delta Regional Monitoring Program Chlorpyrifos and Diazinon Monitoring Results, October 2015 – September 2016

Introduction

In December 2008, the Sacramento Valley Water Quality Coalition (Coalition or SVWQC) submitted a Management Plan to address specific water quality impairments within the Coalition area. A requirement of the Management Plan is to document monitoring and management activities conducted on behalf of members of the Coalition and required by the Central Valley Regional Water Quality Control Board (Regional Board)'s Basin Plan Amendments for the Control of Diazinon and Chlorpyrifos Runoff into the Sacramento and Feather Rivers (Resolution No. R5-2007-0034) and the Sacramento-San Joaquin Delta (Delta) (R5-2006-0061).¹ The Basin Plan Amendments set forth Total Maximum Daily Load (TMDL) requirements for dischargers and require that dischargers comply with the monitoring and management criteria defined in the *Water Quality Control Plan for the Sacramento River and San Joaquin River Basins* (Basin Plan). An Addendum² to the Coalition's approved Management Plan addresses the Coalition's planned activities to comply with the TMDL requirements specific to two organophosphate (OP) pesticides, chlorpyrifos and diazinon. Beginning in 2009, the Addendum for TMDL compliance monitoring was developed in collaboration with the Irrigated Lands Regulatory Program (ILRP) staff and was formally submitted to the Regional Board on April 30, 2010, as part of the *Management Plan Progress Report*. At the request of ILRP staff, the Addendum was resubmitted as a separate document on December 7, 2010.

In fulfillment of the requirements set forth in the Management Plan, the Coalition is submitting this annual TMDL Compliance Report summarizing the 2016 monitoring objectives, locations of sampling sites, and compliance results.

¹ On March 28, 2014, the Regional Board adopted Resolution R5-2014-0041, Amendment to the Water Quality Control Plan for the Sacramento River and San Joaquin River Basins for the Control of Diazinon and Chlorpyrifos Discharges. Before becoming fully effective, the Amendment must be approved by the State Water Resources Control Board (State Water Board), the Office of Administrative Law (OAL), and U.S. Environmental Protection Agency (U.S. EPA). The State Water Board approved the Basin Plan amendment on June 16, 2015 with Resolution No. 2015-0043. On March 8, 2017, the OAL provided notice of approval of this regulatory action (OAL File No. 2017-0124-04S). Action by the U.S. EPA is still pending.
http://www.waterboards.ca.gov/centralvalley/water_issues/tmdl/central_valley_projects/central_valley_pesticides/index.shtml

² *Addendum to Sacramento Valley Water Quality Coalition Management Plan: Chlorpyrifos and Diazinon TMDLs*. Sacramento Valley Water Quality Coalition, Sacramento, California. April 2010.

Background

The federal Clean Water Act requires each state to identify waters within its boundaries that are not currently meeting or maintaining water quality standards (33 USC 1313 (d)(1)). Water quality standards consist of the beneficial uses for which waterways are used as well as water quality objectives set at specified levels to maintain the beneficial uses. In 1994, the Sacramento and Feather Rivers were listed as impaired by diazinon by the Regional Board. As a result of the 303(d) listings, the Regional Board adopted a TMDL in accordance with the federal Clean Water Act (33 USC 1313 (d)(1)). Loads established in a TMDL are required to implement the applicable water quality standards, considering seasonal variations and a margin of safety (*Id.*). In addition to adopting a TMDL, the Regional Board also prepared and adopted a Basin Plan Amendment that included new water quality objectives for diazinon, as well as an implementation plan. The Basin Plan Amendment was intended to establish an orchard runoff control program that focused on protecting the Sacramento and Feather Rivers from the impacts of diazinon.

More specifically, the Regional Board adopted (and the State Water Board and U.S. EPA approved) diazinon water quality objectives of 0.080 µg/L as a 1-hour average (i.e., acute objective) and 0.050 µg/L as a 4-day average (i.e., chronic objective). At the time of adoption (and subsequently), questions were raised about the validity of the objectives and the studies from which the objectives were derived. As a result of subsequent litigation, the Regional Board committed to reviewing the objectives by July 1, 2007, and potentially amending the objectives by July 1, 2008. The Regional Board adopted new amendments to revise the diazinon objectives to **0.16 µg/L** as a 1-hour average and **0.10 µg/L** as a 4-day average (*Basin Plan Amendments to the Water Quality Control Plan for the Sacramento River and San Joaquin River Basins for the Control of Diazinon and Chlorpyrifos Runoff into the Sacramento and San Joaquin River Basins*).³ The previously approved Basin Plan amendment contained requirements for an Orchard Pesticide Runoff and Diazinon Runoff Control Program. As part of the Control Program, the Regional Board required dischargers of diazinon to submit a management plan that “describes actions that the discharger will take to reduce diazinon discharges and meet the applicable allocations by the required compliance date.” In lieu of individual plans, the Basin Plan Amendment allows a discharger group or a coalition to submit management plans.

The Basin Plan Amendments (R5-2007-0034 and R5-2006-0061) require dischargers, either individually or as a coalition, to submit a management plan that describes the actions that they will take to reduce chlorpyrifos and diazinon discharges and meet the applicable allocations by the required compliance dates. The Coalition’s Management Plan (SVWQC 2009) includes a process for source identification and identification of additional management practices that may be needed to achieve additional reductions in chlorpyrifos and diazinon discharges. Quarterly meetings are held with the Regional Board in order to evaluate progress in meeting these reductions, and revisions to the Management Plan will be made if sufficient progress is not being achieved.

The Coalition continues to monitor chlorpyrifos and diazinon according to the Coalition’s approved monitoring schedules and the SVWQC 2014 Monitoring and Reporting Program

³ The 2007 Basin Plan Amendment also included objectives for chlorpyrifos: **0.025 µg/L** as a 1-hour average and **0.015 µg/L** as a 4-day average.

(MRP) Order⁴. The monitoring locations are representative of agricultural discharges to the Sacramento River, Feather River, and other Delta waterways. This monitoring will continue to provide information on the wide range of discharges and hydrologic conditions likely to occur in the Sacramento Valley watershed and Delta. The Coalition's Addendum to the Management Plan presents the technical rationale for selecting the representative monitoring locations for the TMDL compliance monitoring and for the schedule for chlorpyrifos and diazinon monitoring.

Monitoring to augment the routine ILRP Core and Assessment monitoring is conducted at existing Coalition monitoring sites in water bodies where at least one exceedance has occurred and that are directly tributary to the affected TMDL water bodies. Coalition efforts in these subwatersheds include, but are not limited to: (1) continued monitoring during time periods when peak pesticide application use occurs, (2) analysis of Pesticide Use Report (PUR) data, (3) holding subwatershed grower meetings, (4) continuing to encourage and evaluate implementation of management practices, and (5) addressing the seven compliance components described in the Basin Plan and listed below in conjunction with other entities identified as potential sources of discharges. Additional activities addressing Basin Plan and MRP Order requirements for source identification, outreach, and management practice evaluation are described in the Coalition's Comprehensive Surface Water Quality Management Plan (CSQMP).

The Coalition's monitoring frequency and locations are evaluated and updated annually for the CSQMP, subject to approval by the Executive Officer of the Regional Board. These annual updates are required by the WDR. The CSQMP was most recently updated and approved by the Regional Board in November 2016.

Recently, chlorpyrifos began to be regulated statewide as a restricted material. On May 6, 2015, the California Department of Pesticide Regulation (CDPR) filed the final documentation to add chlorpyrifos to the list of State Restricted Use Pesticides. This rule, which became effective on July 1, 2015, affects all products containing chlorpyrifos as an active ingredient (AI) when labeled for production of an agricultural commodity. The new state-restricted⁵ status requires that all chlorpyrifos products registered for production agricultural use must adhere to additional requirements for all California restricted materials.

⁴ Prior to adoption of the Waste Discharge Requirements (WDRs) *General Order for Growers within the Sacramento River Watershed that are Members of a Third-Party Group* (R5-2014-0030), the Coalition was subject to a Conditional Waiver of WDRs for the ILRP and subsequent amendments to the ILRP requirements (WQO-2004-0003, SWRCB 2004, R5-2005-0833, R5-2008-0005, R5-2009-0875).

⁵ State-restricted materials include pesticides deemed to have a higher potential to cause harm to public health, farm workers, domestic animals, honeybees, the environment, wildlife, or other crops compared to other pesticides. Additional information is available at: <http://www.cdpr.ca.gov/docs/enforce/permitting.htm>

MONITORING OBJECTIVES

The purpose of the TMDL monitoring is to determine whether numeric water quality objectives for chlorpyrifos and diazinon contained in the Basin Plan are continuing to be met in the Sacramento and Feather Rivers, as well as other Sacramento-San Joaquin Delta waterways. Specifically, the Basin Plan identifies the goals listed in **Table 1** (Chapter V. Surveillance and Monitoring, page V-4.00) for compliance monitoring for the TMDL. These goals are addressed in the Compliance Monitoring Report.

Table 1. Basin Plan Amendment TMDL Compliance Monitoring Goals

Compliance Monitoring Goal	Report Section Heading(s)	Page(s)
1. Determine compliance with established water quality objectives and loading capacity for chlorpyrifos and diazinon in the Sacramento and Feather Rivers and the Sacramento-San Joaquin Delta	Monitoring Results	8-14
2. Determine compliance with established waste load allocations and load allocations for chlorpyrifos and diazinon	Discussion	15-26
3. Determine the degree of implementation of management practices to reduce off-site migration of chlorpyrifos and diazinon	Outreach and Follow-Up Regarding TMDL Exceedances	27-29
4. Determine the effectiveness of management practices and strategies to reduce off-site migration of chlorpyrifos and diazinon	Outreach and Follow-Up Regarding TMDL Exceedances	27-29
5. Determine whether alternatives to chlorpyrifos and diazinon are causing surface water quality impacts	Toxicity and Additional Pesticide Results	30-31
6. Determine whether the discharge causes or contributes to a toxicity impairment due to additive or synergistic effects of multiple pollutants	Compliance with Load Allocations in the TMDL Receiving Water Bodies; Toxicity and Additional Pesticide Results	18-26; 30-31
7. Demonstrate that management practices are achieving the lowest pesticide levels technically and economically achievable	Summary	32

SAMPLING SITES

An overall map of the Coalition compliance monitoring sites for chlorpyrifos and diazinon is presented in **Figure 1**. Locations within the Coalition area for monitoring of chlorpyrifos and diazinon to satisfy the TMDL requirements are presented in **Table 2**. Compliance with TMDL objectives and loading capacity concentrations is assessed at the 14 sites identified as compliance monitoring sites. These specific sites were selected because they are within the TMDL watersheds, are tributary to the TMDL water bodies, and have minimal non-agricultural influences. The schedule of monitoring for organophosphate pesticides at these compliance sites is documented in the Coalition's annual monitoring plans. The seasonal timing of the Coalition's ILRP pesticide monitoring at individual sites is based on pesticide use patterns in each subwatershed, as characterized in the Coalition's approved 2009 Monitoring and Reporting Program Plan (MRPP). These schedules were retained for the TMDL monitoring in 2010 and 2011, and updated subsequently for current pesticide use patterns.

Delta Regional Monitoring Program Participation

The Coalition has chosen to participate in the Delta Regional Monitoring Program (Delta RMP) in lieu of some monitoring requirements for the Sacramento-San Joaquin Delta Chlorpyrifos and Diazinon TMDL. Specifically, required monitoring at Ulatis Creek at Brown Road (UCBRD) will be met with data obtained via the Delta RMP. The Coalition will acquire and submit the monitoring data from the Delta RMP for 2016-2019 to meet the monitoring and reporting requirements of the Order and the Basin Plan. The approval letter from the Regional Board for Delta RMP participation, specifying the approved monitoring reductions, is included as **Appendix B**⁶.

⁶ Water Year 2016 (October 1, 2015-September 30, 2016) is a Non-Assessment Monitoring Year.

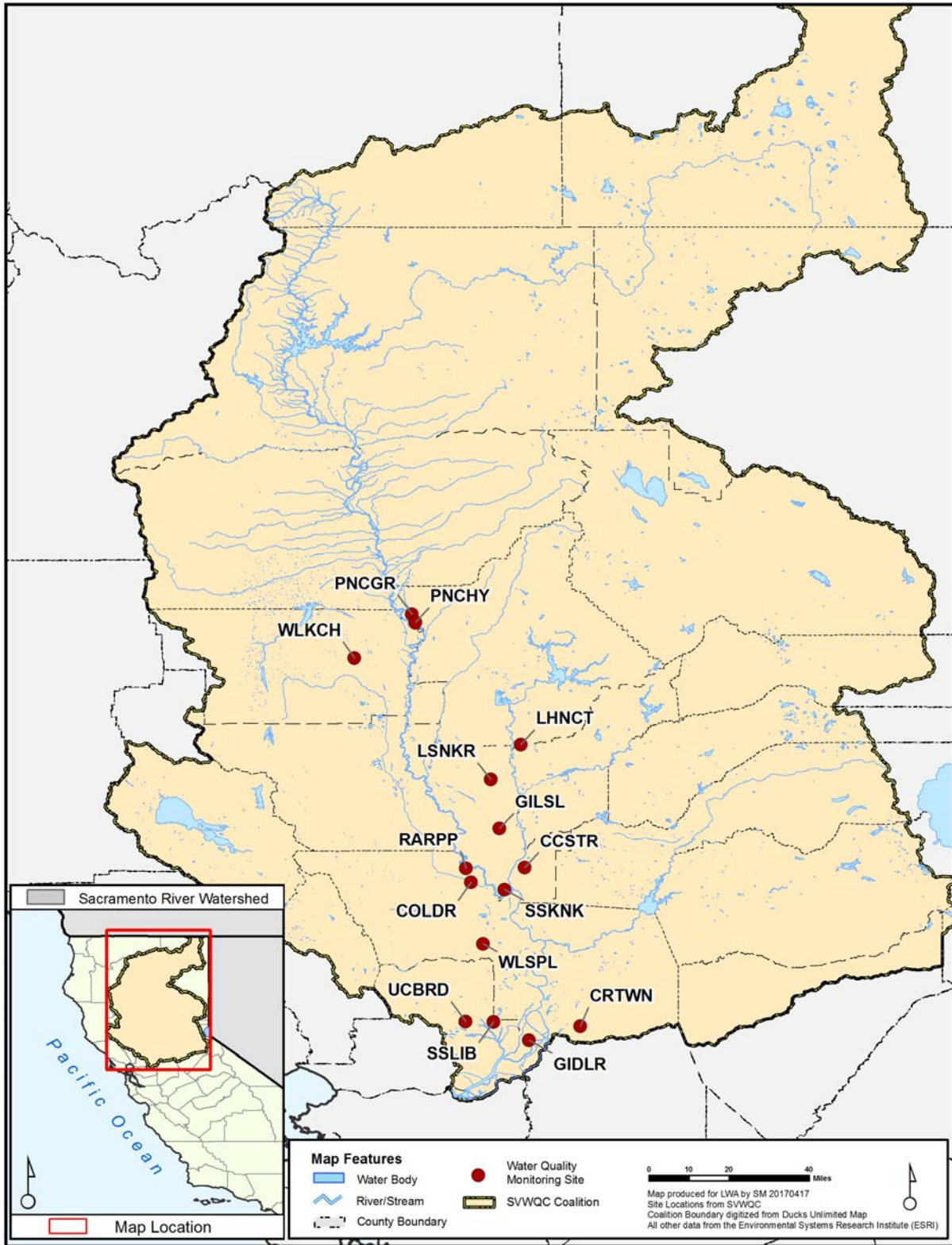


Figure 1. Coalition Compliance Monitoring Sites for Chlorpyrifos and Diazinon Runoff Management Plan

Table 2. Compliance Monitoring Sites for Chlorpyrifos and Diazinon Runoff Management Plan

Subwatershed	Location	Site ID	Lat.	Long.	Delta, Sacramento, or Feather River Basin Subarea
ButteYubaSutter	Gilsizer Slough at George Washington Rd.	GILSL	39.0090	-121.6716	Lower Feather River, Sac. River
ButteYubaSutter	Lower Honcut Creek at Hwy 70	LHNCT	39.30915	-121.59542	Feather River
ButteYubaSutter	Lower Snake River at Nuestro Rd.	LSNKR	39.18531	-121.70358	Feather River
ButteYubaSutter	Pine Creek at Nord Gianella Rd.(1)	PNCGR	39.7811	-121.9877	Sac. River
ButteYubaSutter	Pine Creek at Highway 32 (1)	PNCHY	39.75338	-121.97124	Sac. River
ButteYubaSutter	Sacramento Slough Bridge near Karnak	SSKNK	38.7850	-121.6533	Sac. River, Northern Delta
ColusaGlenn	Colusa Basin Drain above Knight's Landing	COLDR	38.8121	-121.7741	Sac. River
ColusaGlenn	Rough and Ready Pumping Plant (RD 108)	RARPP	38.86209	-121.7927	Sac. River, NW Delta
ColusaGlenn	Walker Creek near 99W and CR33	WLKCH	39.62423	-122.19652	Sac. River
PNSSNS	Coon Creek at Striplin Rd.	CCSTR	38.8661	-121.5803	Sac. River
SacramentoAmador	Cosumnes River at Twin Cities Rd.	CRTWN	38.29098	-121.38044	Eastern Delta
SacramentoAmador	Grand Island Drain near Leary Rd.	GIDLR	38.2399	-121.5649	Northern Delta
SolanoYolo	Shag Slough at Liberty Island Bridge	SSLIB	38.30677	-121.69337	NW Delta
SolanoYolo	Ulati Creek at Brown Road	UCBRD	38.3070	-121.7940	NW Delta
SolanoYolo	Willow Slough Bypass at Pole Line	WLSPL	38.59015	-121.73058	NW Delta

Note:

(1) Beginning February 2014, the Pine Creek monitoring site (located in the ButteYubaSutter subwatershed) was moved downstream from PNCGR to PNCHY.

Monitoring Results

All TMDL monitoring data through September 2016 have been previously submitted to the Regional Board as required by the ILRP. A complete set of relevant monitoring data for compliance sites for 2009 through September 2016 is also provided in **Appendix A**.

DATA INTERPRETATION

Assessment of Data Quality Objectives

The data quality objectives for the TMDL monitoring effort are described in the Coalition's Quality Assurance Project Plan (QAPP) for the ILRP. All quality assurance (QA) for TMDL compliance monitoring is integrated into the Coalition's ILRP monitoring program. These results have been submitted to the Regional Board on a quarterly basis, as required by the ILRP.

Representativeness of the data collected was assured by selection of appropriate sampling and analytical methods. There was no deviation from the standard operating procedures specified in the QAPP, and the data are considered adequately representative for the purpose of the compliance monitoring program. Analytical precision is assessed by analyzing laboratory-prepared matrix spike duplicates, and sampling precision is evaluated by analyzing field-collected sample replicates. Analytical accuracy is assessed by routine calibration and analysis of a laboratory-prepared matrix and by addition of surrogate organic compounds to sample matrices. Based on the results of field and laboratory QA analyses, precision and accuracy met program data quality objectives and were adequate for the purposes of the monitoring compliance program.

Completeness is defined as the percent of planned data that were successfully collected and analyzed. Approximately 95% of samples planned for October 2015 through September 2016 were successfully collected and analyzed (i.e., 102 of the 107 initial water column and toxicity sample events planned). Based on the total number of planned and analyzed samples, overall completeness for planned chlorpyrifos and diazinon analyses from January 2009 through September 2016 was 99% (**Table 3**). All planned October 2015 through September 2016 TMDL compliance parameters have been successfully collected and analyzed, with the following exception:

- Flow measurements could not be collected for all sites and events due to site access or site conditions during some events.⁷ Furthermore, the Delta RMP does not report observations for flow. This prevented the calculation of loads for two diazinon detections in Ulatis Creek at Brown Road (UCBRD) (**Table 6**). Loads were successfully characterized for all other TMDL compliance results during the period October 2015 through September 2016.

⁷ In some cases, the field crew visually estimated the flow when measurements could not be collected.

Table 3. TMDL Compliance Sampling Completeness Summary

Compliance Site	JAN 2009 – SEP 2015		OCT 2015 – SEP 2016			JAN 2009 – SEP 2016	
	Planned	Collected	Planned	Collected	Note	Planned	Collected
Colusa Basin Drain above KL	40	41	4	4	(2)	44	45
Coon Creek at Striplin Road	25	25	---	---	(2)	25	25
Cosumnes River at Twin Cities Road	26	16	---	---	(2)	26	16
Gilsizer Slough at George Washington Road	31	33	6	6	---	37	39
Grand Island Drain near Leary Road	35	38	3	3	---	38	41
Lower Honcut Creek	37	38	---	---	(2)	37	38
Lower Snake River at Nuestro Road	35	37	---	---	(2)	35	37
Pine Creek ⁽¹⁾	28	27	4	4	---	32	31
Rough and Ready Pumping Plant (RD 108)	36	37	---	---	(2)	36	37
Sacramento Slough bridge near Karnak	30	31	1	1	(2)	31	32
Shag Slough at Liberty Island Bridge	38	38	---	---	(2)	38	38
Ulatis Creek at Brown Road	39	40	12	12	(3)	51	52
Walker Creek near 99W and CR33	36	30	---	---	(2)	36	30
Willow Slough Bypass at Pole Line	38	40	4	4	---	42	44
Totals	474	471	34	34	---	508	505
Percent Completeness		99%		100%	---		99%

Notes:

- (1) Beginning Event 96, the Pine Creek monitoring site was moved from Nord Gianella Road (PNCGR) to Highway 32 (PNCHY).
- (2) Monitoring at this site during Water Year 2016 (October 1, 2015-September 30, 2016), a non-assessment monitoring year, is indirectly addressed by the Delta RMP. Refer to the approval letter for reduced individual monitoring as a result of participation in the Delta RMP, provided as Appendix B.
- (3) Monitoring at this site during Water Year 2016 (October 1, 2015-September 30, 2016), a non-assessment monitoring year, is directly addressed by the Delta RMP. Refer to the approval letter for reduced individual monitoring as a result of participation in the Delta RMP, provided as Appendix B.

Comparison with TMDL Objectives and Discussion of Exceedances

A summary of the number of analyses of water quality samples collected January 2009 through September 2016 for TMDL compliance monitoring is presented in **Table 4** and **Table 5** for chlorpyrifos and diazinon, respectively. Occurrences when results exceeded water quality objectives are also indicated in the tables.

Table 4. Summary of 2009-2016 TMDL Monitoring Results for Chlorpyrifos

Compliance Site	JAN 2009 – SEP 2015		OCT 2015 – SEP 2016		JAN 2009 – SEP 2016	
	>WQO	# of Samples	>WQO	# of Samples	Total >WQO	Total Samples
Colusa Basin Drain above KL		41		4		45
Coon Creek at Striplin Rd.	1	25		0	1	25
Cosumnes River at Twin Cities Rd.		16		0		16
Gilsizer Slough at George Washington Rd.	4	33		6	4	39
Grand Island Drain near Leary Rd.	2	38		3	2	41
Lower Honcut Creek		38		0		38
Lower Snake River at Nuestro Rd.		37		0		37
Pine Creek ⁽¹⁾	7 ⁽²⁾	27	1 ⁽³⁾	4	8	31
Rough and Ready Pumping Plant (RD 108)		37		0		37
Sacramento Slough bridge near Karnak		31		1		32
Shag Slough at Liberty Island Bridge	1	38		0	1	38
Ulatis Creek at Brown Rd.	5	40		12	5	52
Walker Creek near 99W and CR33	1	30		0	1	30
Willow Slough Bypass at Pole Line	2	40		4	2	44
<i>Total</i>	23	471	1	34	24	505

Note:

- (1) Beginning Event 96 (February 2014), the Pine Creek monitoring site was moved from Nord Gianella Road (PNCGR) to Highway 32 (PNCHY).
- (2) Five exceedances at Pine Creek occurred in isolated ponded water with no flow. A flow measurement could not be collected for one event for which an exceedance was observed. Review of data indicates that three "exceedances" reflect degradation of the original elevated concentration and not additional discharges of chlorpyrifos.
- (3) The associated field replicate result (0.11 µg/L) collected on 7/19/2016 also exceeded the WQO.

Table 5. Summary of 2009-2016 TMDL Monitoring Results for Diazinon

Compliance Site	JAN 2009 – SEP 2015		OCT 2015 – SEP 2016		JAN 2009 – SEP 2016	
	>WQO	# of Samples	>WQO	# of Samples	Total >WQO	Total Samples
Colusa Basin Drain above KL		41		4		45
Coon Creek at Striplin Road		25		0		25
Cosumnes River at Twin Cities Road		16		0		16
Gilsizer Slough at George Washington Rd.	2	33		6	2	39
Grand Island Drain near Leary Road	2 ⁽²⁾⁽³⁾	38		3	2	41
Lower Honcut Creek		38		0		38
Lower Snake River at Nuestro Road		37		0		37
Pine Creek ⁽¹⁾		27		4		31
Rough and Ready Pumping Plant (RD 108)		37		0		37
Sacramento Slough bridge near Karnak		31		1		32
Shag Slough at Liberty Island Bridge		38		0		38
Ulatis Creek at Brown Road		40		12		52
Walker Creek near 99W and CR33		30		0		30
Willow Slough Bypass at Pole Line		40		4		44
<i>Total</i>	4	471		34	4	505

Notes:

(1) Beginning Event 96 (February 2014), the Pine Creek monitoring site was moved from Nord Gianella Road (PNCGR) to Highway 32 (PNCHY).

(2) The exceedance occurred in only one of two field samples collected on 10/19/2010.

(3) The associated field replicate result (0.1672 µg/L) collected on 10/29/2013 also exceeded the WQO.

Delta Regional Monitoring Program

During the 2015-2016 monitoring year, the Delta RMP conducted monitoring for the project “Delta RMP - Current Use Pesticides” at the following five sites:

- Ulatis Creek at Brown Road (511ULCABR);
- Mokelumne River at New Hope Road (544SAC002);
- Sacramento River at Hood Monitoring Station Platform (510SACC3A);
- San Joaquin River at Buckley Cove (544LSAC13); and
- San Joaquin River at Airport Way near Vernalis (541SJC501).

Between July 2015 through September 2016, chlorpyrifos and diazinon were detected in only one (1.3 %) and seven (9.3%), respectively, of the 75 samples collected monthly at these five sites. None of the samples exceeded the adopted Basin Plan Amendment 4-day chronic or the 1-hour acute objectives for either chlorpyrifos or diazinon.

Compliance with Concentration-Based and Load-Based TMDL Objectives

Concentrations of chlorpyrifos and diazinon were compared to the adopted Basin Plan Amendment objectives for the Sacramento and Feather Rivers and Delta. All detected concentrations are presented in **Table 6**.

Chlorpyrifos

Between October 2015 through September 2016, chlorpyrifos was detected in three (3) of 34 samples (8.8%) collected at the seven (7) compliance monitoring locations that were monitored this year. A single sample (2.9% of samples) exceeded the adopted Basin Plan Amendment 4-day chronic objective (0.015 µg/L) and the adopted Basin Plan Amendment 1-hour acute objective (0.025 µg/L) for chlorpyrifos. The exceedance occurred at Pine Creek (July 2016).

Pine Creek (Event 125)

There were five reported applications of chlorpyrifos in the month prior to the July 19, 2016 exceedance. Chlorpyrifos was applied to approximately 232 acres of walnuts and 38 acres of walnuts (two separate applications) in the Pine Creek drainage during that time. Although water was present in the creek, field crews were unable to measure flow at this site. The field crew visually inspected the water body and noted that there was no observable flow. In the preceding weeks before the event, there had been no recorded precipitation. Toxicity tests were not performed during this event.

Diazinon

Between October 2015 through September 2016, diazinon was detected in only two (2) of the 34 samples (5.9%) collected at the seven (7) compliance monitoring locations that were monitored this year. No concentrations exceeded the adopted Basin Plan Amendment 4-day chronic objective (0.10 µg/L) nor the 1-hour acute objective (0.16 µg/L) for diazinon.

Load Estimates

Instantaneous loads were also calculated for all compliance sites. Loads were calculated as:

$$Load = Q \times C \times UCF$$

Where, *Load* is the instantaneous load expressed in g/day,

Q = instantaneous discharge in cubic feet per second (cfs)

C = sample chlorpyrifos or diazinon concentration in µg/L, and

UCF = a unit conversion factor of 2.45 (g*second*L/ µg*day*cubic feet)⁸.

Loads for all detected concentrations are provided in **Table 6**.

⁸ Unit conversion factor: [1 g/ 1,000,000 µg]*[86,400 seconds/day]*[28.32 liter/cubic foot]

Table 6. Load Estimates for Detected Chlorpyrifos and Diazinon, October 2015 – September 2016

Site ID	Water Body	Sample Date	Discharge, CFS	Concentrations, µg/L		Instantaneous Loads, g/day		Notes
				Chlorpyrifos	Diazinon	Chlorpyrifos	Diazinon	
GILSL	Gilsizer Slough	4/20/2016	0	0.0061	ND	0.00	0.00	(1,3)
GILSL	Gilsizer Slough	7/19/2016	0	0.013	ND	0.00	0.00	(1,3)
PNCHY	Pine Creek	7/19/2016	0	0.11	ND	0.00	0.00	(2,3)
UCBRD	Ulatis Creek	3/7/2016	NR	ND	0.0442	0.00	---	(1)
UCBRD	Ulatis Creek	7/13/2016	NR	ND	0.0131	0.00	---	(1)

Notes: Exceedances of TMDL concentration objectives are highlighted yellow in the table.

NR = Not Recorded

ND = Not Detected

(1) Concentrations were below WQO; no contribution to exceedances

(2) Concentrations exceeded WQO

(3) No measureable flow

(4) Unable to measure flows, zero flow was visually estimated

The Basin Plan TMDL amendments also implement measures designed to address the additive toxicity of chlorpyrifos and diazinon. Compliance with the TMDL Load Allocations for non-point sources was determined using the methodology outlined in the Basin Plan Amendments for the Control of Diazinon and Chlorpyrifos Runoff (Resolutions R5-2007-0034 and R5-2006-0061). This methodology takes into account the additive effects of chlorpyrifos and diazinon.

Compliance was calculated using the following equation:

$$S = \frac{C_D}{WQO_D} + \frac{C_C}{WQO_C} \leq 1.0$$

Where the loading concentration may not exceed the *Sum(S)* of one (1.0):

C_D = diazinon concentration in µg/L; analytical results reported as “non-detected” concentrations are considered to be zero

C_C = chlorpyrifos concentration in µg/L; analytical results reported as “non-detected” concentrations are considered to be zero

WQO_D = 1-hour or 4-day average diazinon water quality objective in µg/L

WQO_C = 1-hour or 4-day average chlorpyrifos water quality objective in µg/L

The one sample collected between October 2015 through September 2016 that exceeded the individual TMDL concentration objectives also exceeded the 4-day TMDL Load Allocation and the 1-hour TMDL Load Allocation, based on combined (i.e., additive) toxic units (TUc or TUa) (Table 7).

Table 7. Compliance with Load Capacity Objectives for Detected Chlorpyrifos and Diazinon, October 2015 – September 2016

Site ID	Water Body	Sample Date	Discharge, CFS	Concentrations, µg/L		Load Allocation Compliance ⁽⁷⁾		
				Chlorpyrifos	Diazinon	1-Hour (TUa)	4-Day Average (TUc)	Notes
GILSL	Gilsizer Slough	4/20/2016	0	0.0061	ND	0.24	0.41	(1,3)
GILSL	Gilsizer Slough	7/19/2016	0	0.013	ND	0.52	0.87	(1,3)
PNCHY	Pine Creek	7/19/2016	0	0.11	ND	4.40	7.33	(2,3,5,6)
UCBRD	Ulatis Creek	3/7/2016	NR	ND	0.0442	0.28	0.44	(1)
UCBRD	Ulatis Creek	7/13/2016	NR	ND	0.0131	0.08	0.13	(1)

Notes: Exceedances of TMDL concentration objectives are highlighted yellow in the table.

NR = Not Recorded

ND = Not Detected

(1) Concentrations were below WQO; no contribution to exceedances

(2) Concentrations exceeded WQO

(3) No measureable flow, therefore, no loads to downstream TMDL receiving waters

(4) Unable to measure flows, zero flow was visually estimated

(5) Concentrations exceeded 4-day average based Load Allocation

(6) Concentrations exceeded 1-hour average based Load Allocation

(7) Compliance is assessed based on the sum of chlorpyrifos and diazinon, TUa and TUc; exceedances are indicated for values greater than 1.0 (values highlighted in yellow).

Discussion

The California Department of Pesticide Regulation has documented the decline in use of insecticide organophosphate chemicals, including chlorpyrifos and diazinon, for nearly every year since 1995. Statewide diazinon use decreased by 88% and chlorpyrifos use decreased by 53% from 1996 to 2010.^{9,10} In the five Coalition subwatersheds within the TMDL compliance region (Butte-Yuba-Sutter; Glenn-Colusa; Placer-Nevada-South Sutter-North Sacramento; Sacramento-Amador; Solano-Yolo), substantial decreases are also evident for diazinon, but the pattern is somewhat different for chlorpyrifos. As illustrated in **Figure 2**, annual agricultural diazinon use decreased on average by about 54% in these five subwatersheds from 2003-2014. In contrast, chlorpyrifos use in the region increased from 2001 to 2005, but has since decreased on average by about 26% each year from the peak usage observed in 2005 (**Figure 3**); although less consistently than diazinon. The recent period of decreasing trend in chlorpyrifos use coincides with the monitoring timeframe of the ILRP.

⁹California Department of Pesticide Regulation (2007). <http://www.cdpr.ca.gov/docs/pur/pur06rep/trends06.pdf>

¹⁰California Department of Pesticide Regulation (2011). <http://www.cdpr.ca.gov/docs/pur/pur10rep/tables/table8.pdf>



Figure 2. Trends in Agricultural Use of Diazinon

The data plotted above are for the five Coalition subwatersheds in the TMDL compliance region (Butte-Yuba-Sutter; Colusa-Glenn; Placer-Nevada-South Sutter-North Sacramento; Sacramento-Amador; Solano-Yolo) and were taken from the California Department of Pesticide Regulation PUR Database.

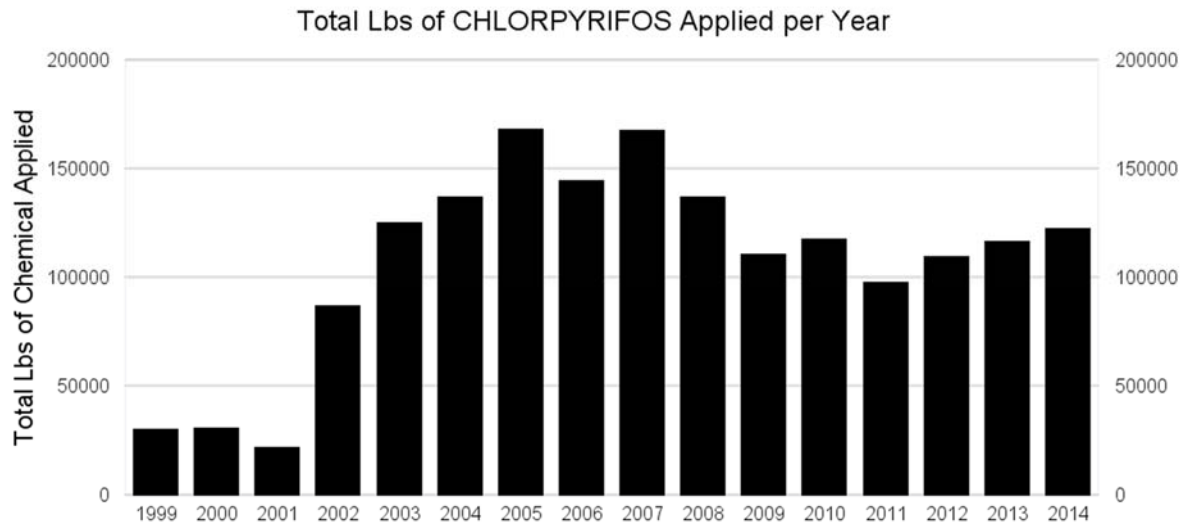


Figure 3. Trends in Agricultural Use of Chlorpyrifos

The data plotted above are for the five Coalition subwatersheds in the TMDL compliance region (Butte-Yuba-Sutter; Colusa-Glenn; Placer-Nevada-South Sutter-North Sacramento; Sacramento-Amador; Solano-Yolo) and were taken from the California Department of Pesticide Regulation PUR Database.

From January 2005 through September 2016, there have been 678 samples collected for the ILRP and analyzed for chlorpyrifos and diazinon at the 14 compliance sites. Results for Coalition monitoring at TMDL compliance sites are summarized in **Table 8**.

Table 8. Summary of Chlorpyrifos and Diazinon Exceedances in Coalition Monitoring at TMDL Compliance Sites, 2005-2016

Data for the five Coalition subwatersheds in the TMDL compliance region (Butte-Yuba-Sutter, Colusa-Glenn, Placer-Nevada-South Sutter-North Sacramento, Sacramento-Amador, Solano-Yolo)

Constituent	Exceedances	Non-Exceedances	Total Samples
Chlorpyrifos	34	644	678
Diazinon	7	671	678
Total	41	1,315	1,356

There have been a total of 41 exceedances of chlorpyrifos and diazinon combined (approximately 3% of all samples) observed in Coalition monitoring at the TMDL compliance sites. Of the 41 total exceedances, 34 have been for chlorpyrifos (~5% of total samples) and seven have been for diazinon (~1% of total samples). These exceedances have been observed at nine of the 14 compliance sites, with seven sites having more than one exceedance. At five of the compliance sites, there have been no exceedances observed in Coalition monitoring. In the 34 samples collected and analyzed for October 2015 through September 2016 TMDL compliance monitoring, there was only one exceedance at one site. The rates of exceedance have been highly variable from year to year, but the longer trend appears to be a decrease in exceedances at the compliance sites (**Figure 4**).

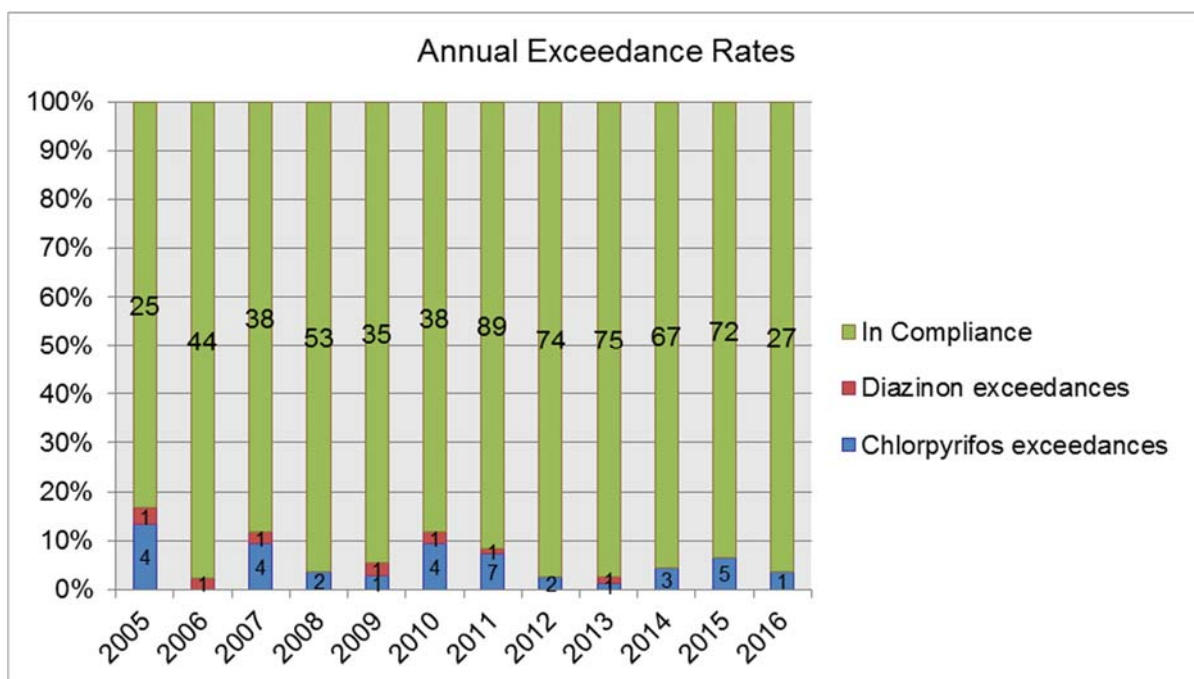


Figure 4. Annual Exceedance Rates at TMDL Compliance Sites, 2005-2016

Annual exceedance rates are calculated as the number of exceedances for each pesticide divided by the total number of samples analyzed for the year. Value labels indicate actual number of samples in compliance or exceedances for each pesticide.

COMPLIANCE WITH LOAD ALLOCATIONS IN THE TMDL RECEIVING WATER BODIES

In separate TMDL monitoring conducted by the Coalition from 2006 to 2008, there were two diazinon exceedances observed at one of the compliance sites (Colusa Drain) in 2008,¹¹ and there were no exceedances observed in 2006 and 2007. Chlorpyrifos was not detected in any TMDL samples collected from the five TMDL monitoring locations sampled from 2006-2008 (Sacramento River at Colusa, Colusa Basin Drain above Knight’s Landing, Sacramento Slough, Feather River above Yuba City, and Feather River near Verona). Although two diazinon exceedances were observed in 2008, the majority of the 95 samples collected from 2006 through 2008 and all of the 21 concentrations estimated at the Sacramento River at Verona monitoring location were in compliance with the TMDL objectives. The overall monitoring results for the Sacramento and Feather River diazinon TMDL indicate that the combination of outreach and education, the increased awareness and the resulting changes in diazinon use patterns and management practices, and the modifications to labeling have been successful in reducing instream ambient chlorpyrifos and diazinon concentrations and loads below the historically observed levels that resulted in listing the Sacramento River and Feather River as impaired for

¹¹ Diazinon Runoff Management Plan for Orchard Growers in the Sacramento Valley: 2008 Annual Report. Sacramento Valley Water Quality Coalition. June 2008.

chlorpyrifos and diazinon. The relatively low rate of exceedances observed in the current TMDL compliance monitoring of the tributaries to these water bodies further indicates that the TMDL objectives will continue to be met.

The TMDL compliance monitoring conducted from 2006-2008 in the named TMDL water bodies indicated that conditions have improved and that these water bodies are generally in compliance with the TMDL. After 2008, continued compliance with the TMDL in the named TMDL water bodies has been assessed indirectly through analysis of monitoring conducted primarily in tributary water bodies (see **Table 2**). The TMDL compliance monitoring from 2009-2014 was conducted at Coalition monitoring sites that were selected to be representative of the larger drainage areas that contribute flows and pollutant loads to the receiving water bodies specifically identified for compliance in the TMDL.

Data from the compliance sites monitored from 2009 through September 2016 can be used in a number of ways to evaluate whether compliance in named TMDL water bodies is continuing and/or improving. The following scenarios were evaluated for TMDL receiving waters for all cases where compliance monitoring site concentrations exceeded or equaled the 1.0 TUC concentration-based Load Allocation.

Scenario 1: No Upstream Receiving Water Loads

The first level of evaluation is to determine whether the loads observed in the individual monitored water bodies were sufficient to *directly cause* exceedances in the named TMDL receiving water bodies. This was accomplished by simple mass load calculations based on the measured loads in the compliance sites and a conservative estimate of the receiving water discharge volume. The receiving water discharges were based on measured flows in Delta tributaries and tidal fluxes for the Delta (Liberty Island) reported by the Department of Water Resources California Data Exchange Center (CDEC)¹². The relationship between all monitoring sites and receiving water flow sites is illustrated in **Figure 5**.

This initial evaluation assumes no chlorpyrifos or diazinon loads (TUC = 0) in the upstream receiving water. This analysis estimated that dilution of loads from the monitored TMDL compliance sites with an exceedance observed between October 2015 through September 2016 would result in TMDL receiving water concentration of 0.00 TUC for the July 2016 event at PNCHY because there was no measurable flow associated with the exceedance (**Table 10**, Scenario 1).

¹² CDEC Historical Data Selector available at: <http://cdec.water.ca.gov/selectQuery.html>

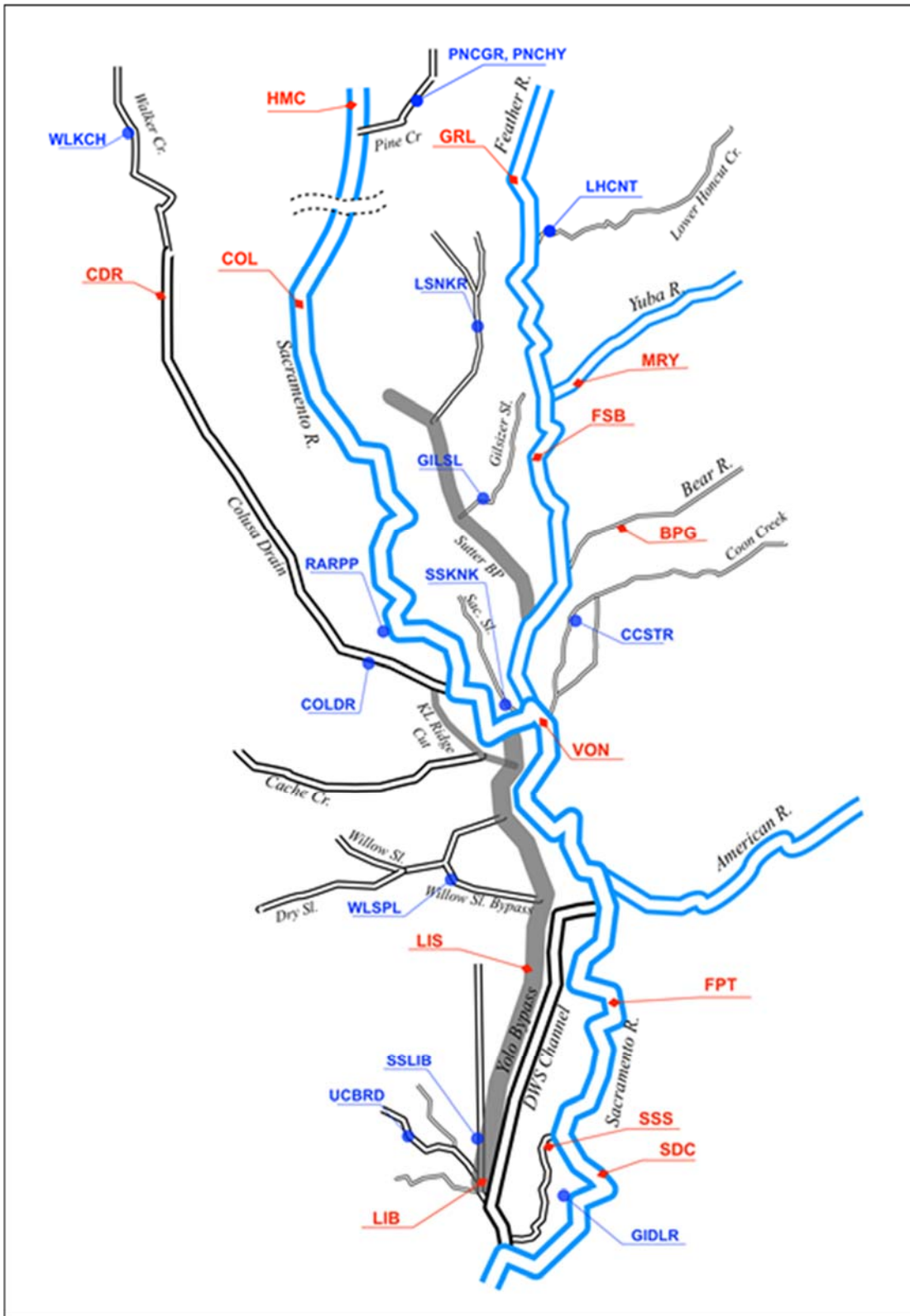


Figure 5. Compliance and Flow Monitoring Sites used for Analysis of Receiving Water Impacts
 (Key for sites on following page)

Feature	KEY	Description
Monitoring Sites	WLKCH	Walker Creek near 99W and CR33
	PNCGR	Pine Creek at Nord Gianella Rd.
	PNCHY	Pine Creek at Highway 32
	LHCNT	Lower Honcut Creek at Hwy 70
	LSNKR	Lower Snake River at Nuestro Rd.
	GILSL	Gilsizer Slough at George Washington Rd.
	CCSTR	Coon Creek at Striplin Rd.
	RARPP	Rough and Ready Pumping Plant (RD 108)
	SSKNK	Sacramento Slough Bridge near Karnak
	COLDR	Colusa Basin Drain above Knight's Landing
	WLSPL	Willow Slough Bypass at Pole Line
	SSLIB	Shag Slough at Liberty Island Bridge
	UCBRD	Ulatis Creek at Brown Road
	GIDLR	Grand Island Drain near Leary Rd.
CRTWN	Cosumnes River at Twin Cities Rd. (off-scale, not included in figure)	
Flow Sites	HMC	Sac. R. at Hamilton City
	COL	Sac. R. at Colusa
	VON	Sac. R. at Verona
	FPT	Sac. R. at Freeport
	SDC	Sac. R. at the Delta Cross-Channel
	CDR	Colusa Drain at Highway 20
	LIS	Yolo Bypass at Lisbon
	LIB	Liberty Island at S. Center End
	SSS	Steamboat Slough between Sutter Slough and Sac. River
	GRL	Feather River at Gridley
	MRY	Yuba River at Marysville
	FSB	Feather River above Star Bend
	BPG	Bear River at Pleasant Grove

Scenario 2: Upstream Receiving Water Loads Equivalent to Additional Represented Loads Extrapolated From Compliance Site

This evaluation uses the same methods as Scenario 1 above, but assumes that the loads in the *upstream* receiving waters are equal to the additional loads from the irrigated acreage represented by the compliance site where the exceedance was observed. The additional loads from the represented irrigated acres were extrapolated from the compliance site loads using the following extrapolation factor:

$$\left(\frac{\text{Represented Irrigated Acres}}{\text{Compliance Drainage Irrigated Acres}} \right) \times \text{Compliance Site Frequency of Exceedance}$$

Where the ratio of irrigated acres accounts for that additional represented acreage, and the frequency of exceedance (for 2009 through the current reporting year) accounts for the probability of individual represented drainages exceeding the concentration-based Load Allocation.

This analysis also estimates that dilution of loads from the monitored TMDL compliance sites and represented irrigated acres would result in TMDL receiving water concentration of 0.0005 TUC for the July 2016 event at PNCHY (Table 10, Scenario 2).

Scenario 3: Reasonable “Worst Case,” Upstream Receiving Water Loads Approaching Load Allocation

This evaluation also uses the same methods as Scenarios 1 and 2, but assumes that the cumulative loads in the *upstream* receiving waters are 90% of the TMDL concentration-based Load Allocation (i.e., 0.9 TUC). This scenario represents a reasonable “worst case” scenario for receiving water conditions coinciding with exceedances in the compliance sites. The addition of the observed load from the compliance site would not cause the receiving water to exceed the concentration-based TMDL Load Allocation of 1 TUC for the July 2016 event at PNCHY under this scenario.

Summary of Evaluation of Compliance with Load Allocations

Continued compliance in the TMDL named water bodies with the TMDL concentration-based Load Allocations can also be inferred from several lines of evidence:

- Past compliance in TMDL water bodies has been demonstrated through direct monitoring of the named TMDL water bodies.
- Use of diazinon and chlorpyrifos in the Sacramento Valley watersheds that drain to these TMDL water bodies continues to decrease or remain constant.
- There is a decreasing trend in the frequency of exceedances for chlorpyrifos and diazinon at the currently monitored TMDL compliance monitoring sites.
- In 2010, the Feather River was removed from the 303(d) list for impairment due to diazinon.
- Loads represented by exceedances observed at individual Coalition TMDL compliance monitoring sites are not sufficient to directly cause an exceedance in the named TMDL water bodies under reasonably expected receiving water conditions (Table 10, Scenario 1).

- Loads and exceedance rates extrapolated from representative compliance sites to larger represented regions are also extremely unlikely to cause exceedances in the named TMDL water bodies (**Table 10**, Scenario 2).
- Loads represented by exceedances observed at individual Coalition TMDL compliance monitoring sites are not sufficient to directly cause an exceedance in the named TMDL water bodies under reasonably worst-case upstream receiving water conditions (**Table 10**, Scenario 3).

Additional qualitative evidence supporting continued compliance is represented by the ongoing outreach and education efforts to address chlorpyrifos and diazinon exceedances throughout the Coalition area. Outreach specific to the exceedances observed between October 2015 through September 2016 is discussed below (Outreach and Follow-Up Regarding TMDL Exceedances). As these efforts continue, it is reasonable to assume that management of pesticide applications and runoff will continue to improve and that exceedances in contributing tributaries and named TMDL receiving waters will continue to decrease in frequency and magnitude.

Changes that were implemented in Yolo County to classify chlorpyrifos and diazinon as restricted materials have also proven successful in further increasing compliance. ILRP monitoring conducted at Yolo County sites since the implementation in 2007 of these additional label and use restrictions have resulted in only five additional exceedances in a total of 116 samples at the compliance site sampled in the Yolo subwatershed (Willow Slough).

Beginning on July 1, 2015, chlorpyrifos began to be regulated statewide as a restricted material, with similar restrictions to those in Yolo County. The new state-restricted status requires that all chlorpyrifos products registered for production agricultural use must adhere to the additional requirements for all California restricted materials:

- Applications must be made or supervised by a certified applicator.
- Purchase, possession, or use requires the property operator to obtain a permit from the County Agricultural Commissioner.
- Businesses require a recommendation from a Department of Pesticide Regulation (DPR) licensed pest control adviser.

The Coalition submitted formal requests to the Executive Officer of the Regional Board for completion of chlorpyrifos management plans in two drainages (Walker Creek and Lower Snake River) in 2013 on the basis that these drainages are meeting water quality objectives. The Walker Creek management plan was approved as complete in January 2014, and the Lower Snake River management plan was approved as complete in March 2015. Additionally, a request for completion of the management plan at Gilsizer Slough for diazinon and Willow Slough for chlorpyrifos were submitted in December 2015. Both were approved for completion in July 2016. A summary of the relevant management plans is included in the following table.

Table 9. Management Plans for Chlorpyrifos and Diazinon

Subwatershed	Waterbody	Analyte	Management Plan Status
ButteYubaSutter	Gilsizer Slough	Chlorpyrifos	Management Plan submitted November 2016
		Diazinon	Approved for completion July 2016
Solano	Pine Creek	Chlorpyrifos	Management Plan submitted November 2016
	Ulatis Creek	Chlorpyrifos	MPIPG is being revised into Management Plan
Yolo	Willow Slough	Chlorpyrifos	Approved for completion July 2016

Note: A Management Plan is triggered when a monitoring result exceeds water quality objectives twice within a three year period. To complete the plan, no exceedances may be observed during a period of three years.

Table 10. Estimated TMDL Receiving Water Body Loads From Compliance Sites and Represented Areas

Compliance Site Water Body	Sample Date	4-Day Average TUC for Compliance Site	TMDL Receiving Water	Receiving Water Discharge Estimate, cfs ⁽¹⁾	Basis for Receiving Water Discharge Estimate	Compliance site drainage irrigated acres	Represented total irrigated acres	Frequency of Exceedance for compliance monitoring site (2009-2012)	Load extrapolation factor ⁽²⁾	Represented additional load ⁽³⁾ , TUC	TMDL Receiving Water Estimation Scenarios ⁽⁴⁾		
											1. Estimated TMDL RW Concentration when upstream load is 0, TUC	2. Estimated downstream TMDL RW Concentration including additional represented load, TUC	3. Estimated downstream TMDL RW Load when upstream concentration assumed to be 0.9, TUC
Pine Creek at Highway 32	7/19/2016	7.33	Sacramento River at Hamilton City	6,551	Measured at Hamilton City	28,384	77,641	25.8%	0.448	3.28	0.0	0.0005	0.9

Notes:

- (1) Receiving Water Discharge Estimate = measured or estimated instantaneous discharge for the receiving water
- (2) Load Extrapolation Factor = (Represented area irrigated acres ÷ Compliance site irrigated acres) X compliance site exceedance percentage
- (3) Represented Additional Load = Monitoring site load X Load Extrapolation Factor
- (4) Estimates of TUC concentration in the TMDL Receiving Water Body, calculated using standard mass balance methods, for comparison to TUC Load Allocation of 1.0 TU.
 Scenario 1 assumes a concentration of 0 TUC in the upstream TMDL Receiving Water Body. The resulting RW TU concentration is thus based on dilution of Compliance site load only.
 Scenario 2 assumes TUC load in the upstream TMDL Receiving Water Body is based on the represented additional load extrapolated from the compliance site. This scenario represents the most realistic RW TU concentration estimate.
 Scenario 3 assumes (very conservatively) a concentration of 0.9 TUC in the upstream TMDL Receiving Water Body. This scenario represents a "worst-case" RW TU concentration estimate.

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OUTREACH AND FOLLOW-UP REGARDING TMDL EXCEEDANCES

Follow-up actions and source evaluations for exceedances in the TMDL water bodies and tributaries have been reported in past Annual Monitoring Reports, Management Plan Progress Reports, or will be reported in future versions of this reports. Typically, the first step taken is to analyze the pesticide application data from the California Department of Pesticide Regulation (CDPR) Pesticide Use Report (PUR) database. All users that were considered to have the potential to contribute to the observed chlorpyrifos exceedance were contacted directly to inform them of the exceedances and appropriate management practices to reduce the risk of future exceedances.

Descriptions of the outreach and education activities conducted by the Coalition's subwatersheds during October 2015 through September 2016 are provided in Appendix F (*SVWQC Outreach Materials*) of the Coalition's 2016 Annual Monitoring Report (AMR).

Butte Yuba Sutter Water Quality Coalition (Pine Creek)

Targeted outreach was conducted by the Butte-Yuba-Sutter Water Quality Coalition in response to the chlorpyrifos exceedance observed at Pine Creek on July 19, 2016. Both targeted outreach and general outreach efforts are summarized below in **Table 11**. Specific actions taken to address the exceedances included mailings, meetings, email distributions, and special events:

- Letters were mailed to members and pest control advisors (PCAs) serving members of the Butte-Yuba Sutter Water Quality Coalition notifying them of the recent chlorpyrifos exceedance.
- Newsletters were sent to members that included reminders of the recent pesticide exceedances and to implement appropriate Best Management Practices (BMPs) for pesticide application, such as to be mindful of the weather and other conditions when planning to apply chemicals.
- Meetings were held to discuss specific Management Plan requirements.
- Presentations were given to provide an overview of the relevant regulation, monitoring results, including discussion of the recent chlorpyrifos exceedances and the Management Plan, and appropriate BMPs.

Table 11. Outreach Activities Conducted by the Butte Yuba Sutter Water Quality Coalition

Date	Location	Attendance	Type of Outreach	Description
<i>Targeted Outreach Specific to the Chlorpyrifos Exceedance Observed at PNCHY on July 19, 2016</i>				
8/23/2016	Butte, Yuba, and Sutter	1,033	E-Newsletter	Chlorpyrifos exceedance
9/15/2016	Butte	4	Phone call	Direct phone calls to members: notification of the exceedance and requiring attendance at the outreach meeting
10/15/2016	Butte, Yuba, and Sutter	1,584	Article/ Newsletter	Fall 2016 Newsletter
11/15/2016	Butte	400	Letter	Chlorpyrifos exceedance
11/30/2016	Silver Dollar Fairground (Chico)	350	Meeting/ presentation	BYSWQC Grower Day 2016
12/13/2016	Silver Dollar Fairground (Chico)	97	Meeting/ presentation	Chlorpyrifos Management Plan (Pine Creek); Best Management Practices (BMPs)
1/10/2017	The Palms (Chico)	80	Meeting/ presentation	NVAS Grower Meeting: program overview, member requirements, exceedances, monitoring review, BMPs
1/19/2017	Silver Dollar Fairground (Chico)	250	Meeting/ presentation	Almond/Walnut Day: program overview, member requirements, exceedances, monitoring review, BMPs
1/26/2017	Butte County Fair Ground (Gridley)	260	Meeting/ presentation	Annual Meeting: program overview, member requirements, exceedances, monitoring review, BMPs
9/30/2017	Butte, Glenn, Tehama, and Sutter	811	Article/ Newsletter	Member requirements and chlorpyrifos exceedance
<i>General Outreach Efforts</i>				
6/21/2016	Patrick Ranch Museum (Durham)	50	Meeting/ presentation	NVAS Meeting: program overview, member requirements, exceedances, monitoring review, BMPs
6/26/2016	Butte, Yuba, and Sutter	1,041	E-Newsletter	Member requirements and

Date	Location	Attendance	Type of Outreach	Description
				BMPs
7/15/2016	Butte, Yuba, and Sutter	1,571	Article/ Newsletter	Summer 2016 Newsletter: member requirements, updates, and chlorpyrifos update
9/1/2016	Butte	1,300	Article/ Newsletter	Chlorpyrifos exceedance
11/1/2016; 11/10/2016; 11/29/2016; 12/8/2016; 12/15/2016; 2/2/2017	Sutter County Ag. Dept, (Yuba City)	60; 62; 65; 61; 60; 30	Meeting/ presentation	Grower Meetings; Peach Day (2/2/2017): program overview, member requirements, exceedances, monitoring review, BMPs
11/10/2016	Butte, Yuba, and Sutter	1,030	E-Newsletter	Member requirements, outreach opportunities, BMPs
11/28/2016	Butte, Yuba, and Sutter	1,027	E-Newsletter	outreach opportunities, BMPs
1/1/2017	Butte, Yuba, and Sutter	2,319	Article/ Newsletter	Member requirements update, Management Plan updates
1/18/2017	Yuba-Sutter Fair Ground (Yuba City)	250	Meeting/ presentation	Spray Safe: program overview, member requirements, exceedances, monitoring review, BMPs
1/31/2017; 3/23/2017	Peach Tree Golf Course (Marysville)	60; 65	Meeting/ presentation	Helena Grower Meeting; Big Valley Ag. Service Grower Meeting: program overview, member requirements, exceedances, monitoring review, BMPs
3/2/2017	Butte, Yuba, and Sutter	1,166	E-Newsletter	Member requirements and BMPs

TOXICITY AND ADDITIONAL PESTICIDE RESULTS

The results of pesticide monitoring between October 2015 and September 2016 are reported in the Coalition's 2016 AMR. There were 747 individual pesticide results analyzed in 33 water column samples (including 216 field duplicates) collected from eight different sites, including both Representative and Management Plan or Special Study sites, during 2016 Coalition monitoring. Analyses were conducted for organophosphates, carbamates, organochlorines, benzophenyls, pyrethroids, and a variety of herbicides. Approximately 70% of samples had no detected pesticides and more than 97.5% of all pesticide results were below detection.

Determine Whether the Discharge Causes or Contributes to a Toxicity Impairment Due to Additive or Synergistic Effects of Multiple Pollutants (Goal 6)

Pesticides that have modes of action that are potentially additive to chlorpyrifos and/or diazinon include carbaryl, malathion, methomyl, naled, and dichlorvos (cholinesterase inhibitors). These pesticides are typically detected much less frequently than chlorpyrifos or diazinon. However, no other pesticides besides chlorpyrifos were detected in the sample collected at Pine Creek (PNCHY) on July 19, 2016, when an exceedance of the chlorpyrifos objectives occurred (**Table 7**).¹³ No toxicity tests were performed for this sample, so further conclusions regarding a toxicity impairment could not be made.

Reviewing the results of the past five monitoring years indicates that toxicity due to additive or synergistic effects with chlorpyrifos or diazinon is extremely rare. There were 57 individual toxicity results (including 18 field duplicates) analyzed in water column and sediment samples collected from eight different sites during 2016 Coalition monitoring. Analyses were conducted for *Selenastrum capricornutum*, *Ceriodaphnia dubia*, and *Hyalella azteca*. Statistically significant toxicity was not observed in any of the individual toxicity results analyzed in either sediment or water column, including 26 samples (eight field duplicates) tested for toxicity to *Ceriodaphnia*. Of the 92 samples (including 11 field duplicates) tested in the 2015 monitoring year, there was only one sample with significant toxicity to *Ceriodaphnia*. The toxic sample was determined to have been caused solely by chlorpyrifos, based on detected concentrations. Previously, of the 118 samples tested between the 2012 and 2014 monitoring years, there were no samples with significant toxicity to *Ceriodaphnia*. Of the 119 samples tested with *Ceriodaphnia* for the 2011 monitoring year, 113 were not toxic, and of the remaining six (6) significantly toxic samples, three (3) were confirmed to have no detectible concentrations of chlorpyrifos or diazinon, for a total of 116 samples free of significant additive or synergistic toxic effects. Of the remaining three samples, one was determined to have been caused solely by chlorpyrifos based on detected concentrations, the second had detected chlorpyrifos and oxyfluorfen below effect concentrations, and the third had no associated pesticide analyses. None of these three significantly toxic samples observed in 2011 can definitively be determined (or excluded) to be the result of synergistic toxic effects with chlorpyrifos and diazinon. However, we can reasonably and definitively conclude that 351 out of 355 samples collected since 2011 did not have additive or synergistic toxicity associated with chlorpyrifos or diazinon (98.9%) and

¹³ The Basin Plan TMDL amendments include methodology to take into account the additive effects of multiple pollutants. For this sample, the detected concentration of chlorpyrifos alone exceeds the load allocation compliance sum of 1.0.

four or fewer samples (<2%) had toxicity that *may potentially* have been attributable to additive or synergistic effects with chlorpyrifos and diazinon.

During the 2016 monitoring year, the Delta RMP conducted analyses for *Selenastrum capricornutum*, *Ceriodaphnia dubia*, and *Pimephales promelas* for samples collected at Ulatis Creek at Brown Road (UCBRD) and did not report any occurrences of significant toxicity.

Determine Whether Alternatives to Diazinon and Chlorpyrifos are Causing Surface Water Quality Impacts (Goal 5)

Based on our evaluation of the relative risks of current use pesticides, most potential alternatives to chlorpyrifos and diazinon have a much lower risk of causing adverse impacts to surface waters and have not been prioritized for monitoring. One exception to this finding is the category of pyrethroid pesticides, which have been identified as having significant potential to cause toxicity in sediments. The potential impacts of pyrethroid pesticides are assessed by the Coalition through toxicity and chemical monitoring of sediment. The Coalition has observed several cases of pyrethroid-caused sediment toxicity and has addressed these cases through Management Plans and other targeted outreach mechanisms. However, our longer-term monitoring indicates that sediment toxicity is not a widespread or common problem in the Coalition's watersheds. Out of 226 sediment toxicity sample events, there have been only 14 cases (6.2%) of significant toxicity with survival less than 80% compared to lab controls, and sediment toxicity has proven to be a recurrent problem at only one site (Z-Drain in Solano County).

Summary

Based on the results of the routine Coalition and TMDL monitoring, compliance with the TMDL water quality objectives and load allocations is achieved in the overwhelming percentage of samples. These results demonstrate that outreach and education, the resulting changes in use patterns and changes in management practices, and modifications to labeling have been successful in reducing instream ambient concentrations of chlorpyrifos and diazinon to the degree required by the TMDL. The relatively low rate of exceedances since the beginning of the ILRP suggests that many of the changes were successfully implemented prior to or soon after 2005. Although exceedances are still occasionally observed, the overall trend from 2005 through September 2016 has been a decrease in the rate of annual exceedances (**Figure 4**). Exceedances observed in the TMDL tributaries monitored for compliance were determined unlikely to cause exceedances of the TMDL Load Allocations in the named TMDL receiving water bodies under any reasonably probable scenario (**Table 10**).

Continuing efforts to further reduce exceedances are being implemented through the Coalition Management Plans for sites that have triggered a Management Plan requirement for these pesticides. Additionally, the Coalition aggressively investigates all exceedances and conducts follow-up contact with growers reporting applications with the potential to cause specific observed exceedances. These combined efforts and the implementation of state-restricted status for chlorpyrifos are expected to result in continuation of the decreasing trend in the number of exceedances for these pesticides.

Demonstrating that management practices are achieving the lowest “technically and economically achievable” pesticide concentrations is fundamentally addressed through the TMDL compliance monitoring (Goal 7). The high level of compliance discussed extensively within this Compliance Report is empirical evidence that this goal is being achieved on a broad geographic scale through the practices employed in the Coalition’s watersheds. Further evidence is provided by the progress toward completion of the Coalition’s Management Plans for chlorpyrifos and diazinon. Furthermore, achieving the level of compliance required for completion of the management plans is direct evidence that the combination of practices employed are effective at reducing and eliminating discharges of chlorpyrifos and diazinon. Five management plans have already been approved for completion: Lower Coon Creek in the Placer-Nevada-South Sutter-North Sacramento subwatershed (chlorpyrifos), Walker Creek in the Colusa-Glenn subwatershed (chlorpyrifos), Willow Slough in the Yolo subwatershed (chlorpyrifos), Gilsizer Slough in Butte-Yuba-Sutter subwatershed (diazinon), and Lower Snake River in the Butte-Yuba-Sutter subwatershed (chlorpyrifos).

References

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Appendix A

Sacramento Valley Water Quality Coalition Chlorpyrifos and Diazinon TMDL Monitoring Results, January 2009 – September 2016

Please see attached Microsoft Excel spreadsheet file.

Appendix B

Delta Regional Monitoring Program Participation Approval Letter for Reduced Individual Monitoring (February 26, 2016)

Appendix C

Delta Regional Monitoring Program Chlorpyrifos and Diazinon Monitoring Results, October 2015 – September 2016