

California Regional Water Quality Control Board Central Coast Region

Change Sheet

Proposed Amendment to the Water Quality Control Plan for the Central Coastal Basin to Establish Total Maximum Daily Loads for Organophosphate Pesticides and Toxicity in the Lower Salinas River Watershed, Monterey County, California



This document summarizes the changes made to the proposed Basin Plan amendment documents for the lower Salinas River watershed organophosphate pesticides and toxicity total maximum daily loads (TMDLs) based on comments received during the November 2, 2023, to December 22, 2023, public comment period. Changes were made to the proposed Basin Plan amendment and the TMDL Project Technical Report as shown below using underlined text to show additions and ~~strikethrough text~~ to show deletions. Note that minor changes, such as documentation dates, are not included herein.

Summary of Changes to Documents

As described in the response to comments document, staff changed the proposed TMDL attainment date for chlorpyrifos and diazinon from 2025 to December 31, 2032 and associated descriptive text. This attainment date is consistent with compliance dates already established in the Agricultural Order (General Waste Discharge Requirements (WDRs) for Discharges from Irrigated Lands Order R3-2021-0040).¹

Changes to the Proposed Basin Plan Amendment

Revised second and third paragraphs in the Compliance Schedule and Milestones for Allocations section on page 18 as follows:

The TMDL attainment date to achieve TMDL allocations for chlorpyrifos and diazinon and the additive toxicity of chlorpyrifos and diazinon is December 31, 2032~~2025~~. This date is consistent with the compliance dates in TMDL areas currently established in the General Waste Discharge Requirements for Discharges from Irrigated Lands, Order R3-2021-0040 (Agricultural Order) for chlorpyrifos and diazinon (see Agricultural Order, Table C.3-4). TMDLs adopted by the Central Coast Water Board in 2011. Current water quality data indicate that the 2011 TMDL allocations are nearly achieved and, in some cases are achieved (e.g., the Salinas Reclamation Canal was removed from the 303(d) List for diazinon during the 2020-2022 California Integrated Report cycle, approved by USEPA on May 11, 2022. The proposed 2025 attainment date to achieve TMDL allocations for chlorpyrifos and diazinon, including additive toxicity, is different than the 2032 compliance date for achieving receiving water limits as reestablished via the Agricultural Order in 2021. TMDL allocations and attainment dates are not enforceable unless and until they are established in a regulatory mechanism as water quality limits and compliance dates, respectively. The Board may establish a compliance date in a modified Agricultural Order that is different from the TMDL attainment date.

Water quality trends for malathion indicate a significant increase in concentrations in the lower Salinas River watershed from 2006 to 2018, and crop application of malathion has been persistent within the TMDL Project area. In addition, all waterbodies within the lower Salinas River watershed exhibit significant toxicity to the survival of one or more test species. ~~As such, a longer timeframe will be necessary to attain malathion~~

¹ Agricultural Order website:

https://www.waterboards.ca.gov/centralcoast/water_issues/programs/ilp/regulatory_information.html

~~allocations. The TMDL attainment date to achieve TMDL allocations for malathion and the additive toxicity of malathion in the presence of chlorpyrifos and/or diazinon is 2032. This 2032 TMDL attainment date is consistent with the receiving water limit compliance date set forth in the current General Waste Discharge Requirements for Discharges from Irrigated Lands, Order R3-2021-0040 (Agricultural Order) for malathion in non-TMDL areas (see Agricultural Order, Table C-3.5). The Board may establish a compliance date in a modified Agricultural Order that is different from the TMDL attainment date for malathion, including the additive toxicity of malathion in the presence of chlorpyrifos and/or diazinon.~~

Changes to the TMDL Technical Report

Revised second and third paragraphs in Section 10.8 – Timeline and Milestones, page 109, as follows:

~~The target attainment date to achieve numeric targets, allocations, and TMDLs for chlorpyrifos and diazinon and the additive toxicity of chlorpyrifos and diazinon is December 31, 2032 2025. This date is consistent with the compliance dates in TMDL areas currently established in the General Waste Discharge Requirements for Discharges from Irrigated Lands, Order R3-2021-0040 (Agricultural Order) for chlorpyrifos and diazinon (see Agricultural Order, Table C.3-4), chlorpyrifos and diazinon TMDLs that were adopted by the Central Coast Water Board in 2011 (see Central Coast Water Board Resolution R3-2011-0005) and current water quality trends as described in Section 6.4 indicate that these allocations are nearly achieved.~~

Water quality trends for malathion indicate a significant increase in concentrations (see Section 6.4) from 2006 to 2018 and crop application of malathion has been persistent within the TMDL Project area. In addition, all waterbodies within the lower Salinas River watershed exhibit significant toxicity to one or more test species using the survival endpoint (see Section 6.5). ~~As such, staff anticipates a longer timeframe will be necessary to attain malathion TMDLs allocations.~~ Staff is proposing an attainment target date of 2032 to achieve the malathion, the additive toxicity of malathion in the presence of chlorpyrifos or diazinon, and the toxicity numeric targets, TMDLs, and allocations. This 2032 target attainment date is consistent with the TMDL compliance dates set forth in the current Agricultural Order (see Agricultural Order, Table C-3.5). Attainment of the toxicity numeric targets will be sufficient to demonstrate attainment of the individual and additive toxicity organophosphate pesticide numeric targets, TMDLs, and allocations.