Hi Peter and Jennifer,

I still owe you a more comprehensive follow-up list from our call yesterday but also wanted to pass along some info I just got on lab detection limits for pyrethroids in water. I was looking at the DPR study (Report 290) that measured pyrethroids in water (whole water samples) in our region and noticed that their detection limits were quite a bit higher than the numeric targets in the TMDL. I inquired and they said that their lab can't achieve detection or reporting limits that low. I then checked with USGS and they can get closer in a research setting, but the only one they've actually met to date is Cyhalothrin at 0.0005 ug/L, for which their MDL is identical to the numeric target. (Typically we are required to have MDL's and RL's below the numeric targets being assessed.)

Just to be clear, this is a separate issue from the whole water/freely dissolved discussion. This just has to do with the availability of measurement techniques sensitive enough to detect Pyrethroids in the water column at the levels specified in the TMDL. One potential problem is that the DPR monitoring currently recommended in Table 7 of the Staff Report does not have MDL's low enough to assess the targets. And then the more general problem is that if DPR and USGS aren't doing it, I'm not sure there is any current monitoring program or lab that is.

I didn't specifically raise this issue in my comment letter or at the May Board meeting because I assumed the TMDL had already been vetted for this sort of thing, but wanted to at least let you know about it off the record. If you want more info a good contact at DPR is Kean Goh and at USGS is Michelle Hladik.

Thanks, Sarah.

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