



# California Regional Water Quality Control Board Central Valley Region

Katherine Hart, Chair



Linda S. Adams  
Acting Secretary for  
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Edmund G. Brown Jr.  
Governor

24 May 2011

David Guy, President  
Northern California Water Association  
445 Capitol Mall, Suite 335  
Sacramento, CA 95814

## SACRAMENTO VALLEY WATER QUALITY COALITION WATER QUALITY COALITION 2010 ANNUAL MONITORING REPORT REVIEW

Thank you for submission of the Sacramento Valley Water Quality Coalition (Coalition) Annual Monitoring Report (AMR), received on 1 March 2011, followed by an amendment received on 29 April 2011. Staff has completed a review (enclosed with this letter) of the AMR for compliance with Monitoring and Reporting Program (MRP) Order No. R5-2009-0875.

The attached review memorandum indicates that the Coalition's AMR presentation and discussion of test results and laboratory QC were incomplete (see items 9, 11, 13, and 16). According to the Coalitions MRP Order, the Coalition is required to describe all laboratory QC issues, missing data, and results that do not meet QC objectives. The Coalition must also identify the cause of these issues, and describe how they will be corrected or avoided in the future to ensure sample integrity and quality.

Staff also identified report quality issues that need to be addressed (see item 8 and the *General Comments on Report Quality* section). Please review the attached memorandum and checklist. The Coalition must address and correct all omissions and errors identified in the staff memorandum and checklist in a revised Annual Monitoring Report. **The revised AMR is due by COB on 15 June 2011.**

The Coalition should submit its next AMR in accordance with the MRP Order by 1 March 2012, and ensure that it complies with all requirements. If you have any questions or comments regarding the review, or need any further information, please contact Mark Cady at (916) 464-4654.

*Original Signed by*

Susan Fregien, Senior Environmental Scientist  
Monitoring and Implementation Unit  
Irrigated Lands Regulatory Program

Joe Karkoski, Chief  
Irrigated Lands Regulatory Program

Enclosure: Staff Review of SVWQC 2010 AMR

cc: Bruce Houldesheldt, NCWA  
Claus Suverkropp, LWA

**California Environmental Protection Agency**





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**TO:** Susan Fregien  
Senior Environmental Scientist  
Irrigated Lands Regulatory Program

**FROM:** Mark Cady  
Environmental Scientist  
Irrigated Lands Regulatory Program

**DATE** 23 May 2011

**SIGNATURE:** Original signed by Mark Cady

**SUBJECT:** 1 MARCH 2011 ANNUAL MONITORING REPORT – SACRAMENTO VALLEY  
WATER QUALITY COALITION

On 1 March 2011, the California Regional Water Quality Control Board, Central Valley Region (Central Valley Water Board) received the Sacramento Valley Water Quality Coalition (Coalition) 1 March 2011 Annual Monitoring Report (AMR). This AMR covers the period October 2009 through September 2010. On 29 April the Coalition submitted a memorandum to amend the original AMR including errata and additional data submission to correct errors and omissions that were detected after the original AMR submission.

In the current memorandum, staff presents comments pursuant to Order No. R5-2008-0005, the Coalition's July 2008 Monitoring and Reporting Program Plan (MRPP) and Coalition specific Order No, R5-2009-0875 (MRP Order).

The review section titles and numbers below are the same as those used in the AMR Checklist (see attached). Staff derived the checklist directly from the MRP Order, Part IV, Section B on pages 19-23. Staff used the checklist to record that the content presented in the AMR meets the minimum prescribed report requirements. If the minimum requirements were not met, this memorandum provides a discussion. No discussion is provided for those items that met the compliance standards.

**Checklist Items:**

**6. Monitoring Objectives and Design.** While the MRP Order does not explicitly require reference to the MRP nor the QAPP sections and page numbers, this is suggested in order to facilitate the review of the AMR and provide ease of use for future users of this report.

A description of Management Plan monitoring is also not explicitly required in the MRP, however monitoring does occur for Management Plan waterbodies and constituents and strategies associated with this monitoring should be included in the AMR.

**7. Sampling Site Descriptions and Rainfall Records for the time period covered under the AMR.** An essential quality of each monitoring site and drainage in the monitoring program

is its representation of a collection of waterways. This program simplifies data collection and reduces cost through representative monitoring and this representation should be clear in all reports and program activities. A description of this representativeness is not explicitly called for in the MRP Order, however it will make the report more useful and clear to include at least some reference to documents such as the MRP Order where representation is described and where the represented waterways are listed (i.e., Attachment C and Part II, Section C, respectively,) or such descriptions in the report itself.

**8. Location Maps.** The 2009 MRP Order Part IV.B states

*Location map(s) showing the sampling sites, crops, and land uses within the Coalition Group's geographic area must be updated once per year (based on **available** sources of information) and included in the Annual Monitoring Report. The map(s) must contain a level of detail that ensures they are informative and useful. The datum must be either WGS 1984 or NAD83, and clearly identified on the map. The source and date of all data layers must be identified on the map(s).*

Maps are provided by the Coalition in the electronic appendices provided on CD, however they do not show the datum, the source or date of the data layers used to create the maps.

**9. Tabulated results.** The monitoring results are presented in the electronic data deliverable (EDD) and in tables of detections and exceedances of water quality trigger limits (AMR Table 20). Additional information that will be helpful in future reports will be summaries of detections and non-detections of pesticides that had been applied, or are typically applied in the represented drainages.

Trace metals were monitored at two sites in the fourth quarter of 2009, however the results from these events are not presented or discussed in the report. It is necessary to report on all required constituents and include the number of non-detections in tabulated results. Trace metal detections should also be shown in tables with calculated hardness-based criteria.

All detections must be reported, however pyrethroids were detected in sediment in three sampling events and were not presented in the report.

**Event 050**, sample date 4/20/10 and **Event 051**, sample date 5/18/10. Detections in sediment reported in EDD were not reported in the AMR: Esfenvalerate, Fenvalerate, and Cyhalothrin.

**Event 053**, sample date 7/20/10. A detection of Cypermethrin is shown in the EDD, but is not reported in the AMR.

**11. Electronic data submitted in a SWAMP comparable format.**

**Laboratory Quality Control Results**

**Event 050**, sample date 4/20/10. No matrix spikes were run for the water samples, though sediment samples were run with matrix spikes.

**13. Copies of chain-of-custody forms and sample receipt documentation**

**Event 044**, sample date 10/21/09. No chain-of-custody forms (COCs) are included in the Caltest Analytical Laboratories report.

## 16. Summary of Quality Assurance Evaluation results.

**Table 8, Summary of Field Blank Quality Control Sample Evaluations for 2010 Coalition Monitoring.** Numbers in the table do not accurately correspond to EDD. For example, Table 8 lists results for Total Organic Carbon as 13 of 13 field blank analyses passing the data quality objective. However in the EDD there is one of 13 total organic carbon field blanks flagged with a non-passing Quality Assurance Code, and an additional quantifiable detection in a field blank that is not flagged. Table 8 shows that 12 of 14 blanks analyzed for turbidity passed the data quality objective. However the EDD shows that of the 14 turbidity blanks, nine had detections, six of which were above the reporting limit. For phosphorus/orthophosphate, Table 8 reports 15 of 17 blanks passed yet in the EDD six of the 17 samples showed quantifiable concentrations of phosphorus. In the EDD, all detections in field blanks at or above the quantitation limits should be qualified in the 'QA Code' column and these should be accurately reported in the AMR. A discussion of the validity of associated data should also be included.

**Event 045**, sample dates 10/17-18/09. This sample set was sent to CRG Laboratories to be analyzed for triazines. The lab report states, "Samples were unable to be analyzed due to failed internal standard recoveries." This failure is not reported in the AMR, nor is it reflected in the determination of completeness (AMR pg. 28).

There were a number of sampling events where sample bottles were damaged in transit without being discussed in the AMR. This represents a quality concern that must be reported in the AMR and should be addressed with reported actions taken to prevent losses in shipping.

**Event 045**, sample dates 10/17-18/09. COC for CRG Marine Laboratories shows 5 broken bottles (of 12).

**Event 047**, sample dates 1/19-21/10. CRG Marine Laboratories COC shows one of 38 bottles received broken, one with cap off.

**Event 048**, sample dates 2/16-17/10. COC from CRG Marine Laboratories states that "Samples were received above recommended range of 0-6° C." Temperatures are listed as 9.1°, 9.3° and 12.4° C, and one of 24 bottles were received broken.

**Event 051**, sample date 5/18/10. CRG Marine Laboratories COC shows one of one bottle of sediment sample (ZDDIX-SE1) received broken. Sample was transferred to 2 foil-wrapped jars.

### General comments on report quality.

**Table 4, Coalition Monitoring: Planned Annual Sampling Frequency**, is for calendar year 2010, however this report is for water year 2010 (October 2009—September 2010).

**Table 7, Sampling for 2010 Coalition Monitoring** has many typographical errors. The stated sample counts for six of the 25 sample sites do not correspond correctly with the number of symbols displayed in the rest of the table, including “ZZDIX” for which either the water or the sediment samples do not appear to be counted.

**Tables 9, 10 and 13** have typographical or calculation errors—some of the columns do not add up to the printed totals.

**Outreach.** While the Coalition has produced an impressive quantity of outreach, this record can be improved upon by showing stronger links between outreach and monitoring results, particularly exceedances. At the present time it appears that information on the results or outcomes of outreach has never been collected. Simple measures of outreach results can be included in future grower surveys, meeting evaluations and internet traffic and response data.

### SVWQC 2010 Annual Monitoring Report Review Checklist

Report Name: Annual Monitoring and Reporting Program						Reviewer Name: Mark Cady					
Submittal Date: 3/1/2011						Review Date: 5/17/11					
Item No.				AMR Component Name	A Acceptable	U Unacceptable	NI/I Not Include d/Incomplete	NA Not Applicable	Page # (Section #)	Comments	
<b>1 Signed Transmittal Letter</b>											
1.1				Transmittal letter included	X						
1.2				Penalty of Perjury Statement	X					Missing from original submittal, subsequently provided in revised transmittal letter.	
1.3				Signature of Authorized Coalition Representative	X						
1.4				Dated	X						
1.5				Submitted by Deadline	X						
1.6				Discussion of exceedances	X					Included in body of the report	
1.7				Discussion of actions taken or planned to correct noted exceedances (or reference to prior correspondence)	X				<i>vi</i>		
<b>2 Title Page</b>											
2.1				Report title	X						
2.2				Date of the report	X						
2.3				Monitoring date range covered by the report	X					Included in the footer	
2.4				Coalition Group name	X						
<b>3 Table of Contents</b>											
3.1				List of sections or chapters with page numbers	X				<i>i-ii</i>		
<b>4 Executive Summary</b>											
4.1				Brief summary of activities	X				<i>v</i>		
4.2				Brief summary of results	X				<i>vii</i>		
4.3				Brief summary of conclusions and recommendations	X				<i>vii-viii</i>		

**SVWQC 2010 Annual Monitoring Report Review Checklist**

Item No.					AMR Component Name	A Acceptable	U Unacceptable	N/I Not Include d/Incomplete	NA Not Applicable	Page # (Section #)	Comments
<b>5</b>	<b>Description of the Coalition Group Geographical Area</b>										
	5.1				General description of relevant geographic features of the Coalition area, such as location and extent of area, major landforms, land uses, vegetation types, crop types, climate patterns, key waterways, and cities	X				3	
<b>6</b>	<b>Monitoring Objectives and Design</b>										
	6.1				<u>Monitoring Objectives</u>						
		6.1.1			List or brief description of monitoring objectives based on MRP Plan	X				4	
		6.1.2			Reference to MRP Plan section and page number where detailed monitoring objectives are found						Not an explicit MRP requirement
		6.1.3			Reference to QAPP section and page number where detailed monitoring objectives are found						Not an explicit MRP requirement
	6.2				<u>Monitoring Design</u>						
		6.2.1			Aligns with monitoring design description in MRP Plan	X					
		6.2.2			Monitoring parameters	X				5	
		6.2.3			Monitoring frequency	X				15-16	
		6.2.4			Time period of monitoring covered in the report	X					Time period is shown in the footer.
		6.2.5			Brief description of Management Plan monitoring						Not an explicit MRP requirement
		6.2.6			Measurement strategies	X					
		6.2.7			Source Identification strategies						Not an explicit MRP requirement
		6.2.8			Description of any deviation from the MRP Plan or QAPP				X		
		6.2.2			Reference to MRP Plan section and page number where detailed monitoring design is found						Not an explicit MRP requirement
		6.2.3			Reference to QAPP section and page number where detailed monitoring design is found						Not an explicit MRP requirement
<b>7</b>	<b>Sampling Site Descriptions and Rainfall Records for the time period covered under the AMR</b>										
	7.1				<u>Sampling Site Descriptions</u>						
		7.1.1			Site Name	X				7-13	

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Item No.				AMR Component Name	A Acceptable	U Unacceptable	NI/I Not Include d/Incomplete	NA Not Applicable	Page # (Section #)	Comments
		7.1.2		Site Identification Number	X				7	
		7.1.3		GPS Coordinates	X				7	
		7.1.4		Description of site representativeness (ie what geographic area, watershed, crop type does the site represent)			X			Not explicitly required in the MRP. See review memo.
		7.1.5		Site-specific monitoring type (core, assessment, special project) information	X				15-16	Shown in Table 4, though the table does not cover the correct reporting period.
		7.1.6		Any other unique information about the site or surrounding area				X		
	7.2			<u>Rainfall Records</u>						
		7.2.1		Graphic or narrative form, in inches of precipitation	X				38-48	
<b>8</b>				<b>Location Maps(s) of sampling sites, crops, and land uses</b>						
	8.1			<u>Map(s)</u>						Detailed maps are required to be updated annually according to MRP Order R5-2009-0875, Section B.3, pg 10.
		8.1.1		Sampling Sites with informative level of detail	X				Appx. E	
		8.1.2		Crop Types with informative level of detail	X				Appx. E	
		8.1.3		Land Uses with informative level of detail	X				Appx. E	
		8.1.4		Datum identified on map as either WGS 1984 or NAD 1983			X			See Review Memo
		8.1.5		Source and date of all data layers identified on map			X			See Review Memo
	8.2			<u>List or Table of Monitoring Site Information</u>						
		8.2.1		Site name	X				7	
		8.2.2		Site identification number	X				7	
		8.2.3		GPS coordinates at latitude and longitude in decimal degrees to at least five decimal places	X				7	
<b>9</b>				<b>Tabulated Results</b>						
	9.1			Data is in tabular form	X					
	9.2			Data is clearly organized (ie readily discernable)			X			See Review Memo
	9.3			Tabulated results agree with the electronic data submittal results			X			See Review Memo
	9.4			Tabulated results agree with results discussed in the text			X			See Review Memo

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Item No.					AMR Component Name	A Acceptable	U Unacceptable	N/I Not Include d/Incomplete	NA Not Applicable	Page # (Section #)	Comments
	9.5				Previously reported exceedances match exceedances identified in the AMR	X					
	9.6				Water Hardness is reported for every water column sample	X					Reported in EDD for every sample where metals were analyzed.
	9.7				Hardness-based metals criteria are calculated correctly			X			See Review Memo.
		9.7.1			Cadmium						
		9.7.2			Copper						
		9.7.3			Lead						
		9.7.4			Nickel						
		9.7.5			Zinc						
	9.8				All required constituents for each site have reported results	X					
	9.9				All toxic events were re-sampled and results reported				X		No toxicity reported (of 5 samples)
<b>10</b>					<b>Data Discussion to Illustrate Compliance</b>						
	10.1				Data discussion to illustrate compliance with the CG Conditional Waiver terms and conditions	X					
		10.1.1			Where compliance not achieved, explanation of why required component not met	X					
	10.2				Data discussion to illustrate compliance with water quality standards and trigger limits	X				Table 20, pg. 54	
		10.2.1			Where compliance not achieved, explanation of missing data and/or reason for non-compliance	X					
<b>11</b>					<b>Electronic data submitted in a SWAMP comparable format, either Option A or B</b>						
	11.1				<u>Option A. Electronic submittal data package in spreadsheet format</u>						
		11.1.1			Lab data is entered and submitted within the ILRP SWAMP comparable data spreadsheets	X					
		11.1.2			ILRP SWAMP comparable field sheets in paper copy	X					Submitted in electronic form
	11.2				<u>Option B. Electronic submittal data package in SWAMP database format</u>						
		11.2.1			All field and lab data is uploaded into a SWAMP comparable database				X		
		11.2.2			Electronic data is formatted to the most current <i>Required Data Submission Format</i> document				X		

**SVWQC 2010 Annual Monitoring Report Review Checklist**

Item No.				AMR Component Name	A Acceptable	U Unacceptable	NI/I Not Include d/Incomplete	NA Not Applicable	Page # (Section #)	Comments	
		11.2.3		Field sample results for lab analyses are included (page 21 #2, MRP)				X			
		11.2.4		<u>Field Quality Control Results</u>							
			11.2.4.1	Spikes			X			No Matrix Spikes for CRG water samples, event 050, 4/20/10. No explanation in AMR.	
			11.2.4.2	Blanks			X			Flied blanks not reported accurately, see Review Memo.	
			11.2.4.3	Surrogates	X						
			11.2.4.4	Duplicates	X						
			11.2.4.5	Replicates				X			
		11.2.5		<u>Laboratory Quality Control Results</u>							
			11.2.5.1	Spikes	X						
			11.2.5.2	Blanks	X						
			11.2.5.3	Surrogates	X						
			11.2.5.4	Certified Reference Materials	X						
			11.2.5.5	Duplicates	X						
			11.2.5.6	Replicates				X			
		11.2.6		Toxicity Analyses electronic submittal requirements	X						
			11.2.6.1	Individual sample results	X						
			11.2.6.2	Negative control summary results	X						
			11.2.6.3	Replicate results	X						
			11.2.6.4	Toxicity test water measurements (if daily measurements are taken then min and max of the range must be reported)	X					In Electronic Data Deliverables	
				11.2.6.4.1 reported pH measurements in toxicity test waters	X					In Electronic Data Deliverables	
				11.2.6.4.2 reported ammonia measurements in toxicity test waters	X					In Electronic Data Deliverables	
				11.2.6.4.3 reported temperature measurements in toxicity test waters	X					In Electronic Data Deliverables	
				11.2.6.4.4 reported DO measurements in toxicity test waters	X					In Electronic Data Deliverables	
		11.2.7		Data not meeting project QA acceptance guidelines is flagged and includes brief notes detailing the problem in the <i>Comments</i> field	X						
<b>12</b>				<b>Description of sampling and analytical methods used</b>							
	12.1			Description of sampling methods used	X				14		

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Item No.					AMR Component Name	A Acceptable	U Unacceptable	NI/ Not Include d/Incomplete	NA Not Applicable	Page # (Section #)	Comments
	12.2				Description of analytical methods used	X					Report refers to QAPP
<b>13</b>					<b>Copies of chain-of-custody forms and sample receipt documentation</b>						
	13.1				Copies of all COCs are included			X			No COC for Caltest event 044.
	13.2				COCs are legible	X					
	13.3				COCs are completed accurately	X					
<b>14</b>					<b>Field Data Sheets, Lab Reports, Lab Raw Data</b>						
	14.1				<u>Field Data Sheets</u>						
	14.1.1				If Coalition chose Option A for electronic data submittal package, field data sheets are the ILRP SWAMP comparable field data sheets (see 11.1) in paper copy	X					
	14.1.2				Copies of all field data sheets are attached to AMR or provided electronically in attached CD (see 14.1.1)	X					
	14.1.3				Field sheets are completely filled in	X					
	14.1.4				Field sheets are legible	X					
	14.2				<u>Toxicity Lab Reports</u>						
	14.2.1				All toxicity lab reports included as attachments to the AMR <u>OR</u> electronically on a CD	X					
	14.2.2				All toxicity lab report copies submitted are complete	X					
	14.2.3				All toxicity lab reports are signed by authorized lab representative	X					
	14.2.4				Toxicity lab narrative describes all QC failures, analytical problems and anomalous occurrences	X					
	14.2.5				All raw lab data for acceptable toxicity tests is included	X					
	14.2.6				All raw lab data for failed toxicity tests is included	X					
	14.2.7				All original bench sheets showing results of individual replicates, such that all calculations and statistics can be reconstructed	X					
	14.2.8				All QC sample results including field and lab blanks, lab control spikes, matrix spikes, field and lab duplicates, and surrogate recoveries are included	X					
	14.3				<u>Chemistry Lab Reports</u>						
	14.3.1				All chemistry lab reports included as attachments to the AMR <u>OR</u> electronically on a CD	X					

**SVWQC 2010 Annual Monitoring Report Review Checklist**

Item No.					<b>AMR Component Name</b>	<b>A</b> Acceptable	<b>U</b> Unacceptable	<b>N/I</b> Not Include d/Incomplete	<b>NA</b> Not Applicable	<b>Page # (Section #)</b>	<b>Comments</b>
		14.3.2			All chemistry lab report copies submitted are complete	X					
		14.3.3			All chemistry lab reports are signed by authorized lab representative	X					
		14.3.4			Chemistry lab narratives describe all QC failures, analytical problems and anomalous occurrences	X					
		14.3.5			All sample results for contract and subcontract labs including units, RLs and MDLs are included	X					
		14.3.6			Sample preparation, extraction, and analysis dates are included	X					
		14.3.7			All QC sample results including field and lab blanks, lab control spikes, matrix spikes, field and lab duplicates, and surrogate recoveries are included	X					
<b>15</b>					<b>Associated laboratory and field quality control samples results</b>						
					These requirements covered under section 14						
<b>16</b>					<b>Summary of Quality Assurance Evaluation results</b>						
	16.1				<u>Quality Assurance Evaluation for LAB Data</u>						
		16.1.1			Acceptance criteria for all measurements of precision and accuracy are listed and coincide with ILRP requirements in MRP Attachment C, Appendix B	X				26-28	
		16.1.2			QA/QC results that did not meet acceptance criteria are identified in a table or narrative description that is prepared by the Coalition (not lab)	X				26-28	
		16.1.3			Discussion of how the failed QA/QC results affect the validity of the reported data	X				28	
		16.1.4			Discussion of corrective actions for QA/QC results that did not meet acceptance criteria is included			X			See Review Memo.
		16.1.5			Calculation of completeness (percentage of QC data that met acceptance criteria and a determination of project completeness based on this)			X			Not correct for samples collected for Event 045 and not analyzed (Triazines, CRG Laboratory).
		16.1.6			Document and discuss any adjustments made to acceptance criteria				X		
		16.1.7			Laboratory exception reports are included when samples are reanalyzed due to exceedance of the linear range				X		
	16.2				<u>Quality Assurance Evaluation for FIELD Data</u>						

**SVWQC 2010 Annual Monitoring Report Review Checklist**

Item No.					<b>AMR Component Name</b>	<b>A</b> Acceptable	<b>U</b> Unacceptable	<b>N/I</b> Not Include d/Incomplete	<b>NA</b> Not Applicable	<b>Page #</b> <b>(Section #)</b>	<b>Comments</b>
	16.2.1				Acceptance criteria for all measurements of precision and accuracy are listed and coincide with ILRP requirements in MRP Attachment C, Appendix B	X				25	Sac Valley MRP Order, Att. E, pg. 20.
	16.2.2				QA/QC results that did not meet acceptance criteria are identified in a table or narrative description that is prepared by the Coalition (not lab)	X					
	16.2.3				Discussion of how the failed QA/QC results affect the validity of the reported data	X					
	16.2.4				Discussion of corrective actions for QA/QC results that did not meet acceptance criteria			X			Contamination of field blanks not discussed.
	16.2.5				Calculation of completeness (percentage of QC data that met acceptance criteria and a determination of project completeness based on this)	X					
	16.2.6				Document and discuss any adjustments made to acceptance criteria				X		
<b>17</b>					<b>Flow Monitoring Method(s)</b>						
	17.1				The method used to obtain flow measurement at each monitoring site during each monitoring event is listed	X					Reported in Field Sheets.
<b>18</b>					<b>Monitoring Site Photos</b>						
	18.1				Photos are included for each monitoring site for every monitoring event, either electronically or in hard copy	X					
	18.2				Each photo is clearly labeled with site ID and date	X					
	18.3				Photos are descriptive and useful	X					
<b>19</b>					<b>Summary of Exceedance Reports submitted during the reporting period and related pesticide use information</b>						
	19.1				Summary of Exceedance Reports submitted during the AMR period	X				52-61	
	19.1.1				Summary includes all needed exceedance reports	X					
	19.2				<u>Pesticide Use Data</u>						
	19.2.1				Pesticide use data is included for all pesticide and toxicity exceedances occurring during the AMR time period (except those that fall under a Mgt Plan)	X				52-58	
	19.2.2				Pesticide use data is directly relevant to the monitoring sites where exceedances occurred	X					

**SVWQC 2010 Annual Monitoring Report Review Checklist**

Item No.					<b>AMR Component Name</b>	<b>A</b> Acceptable	<b>U</b> Unacceptable	<b>N/I</b> Not Include d/Incomplete	<b>NA</b> Not Applicable	<b>Page # (Section #)</b>	<b>Comments</b>
		19.2.3			Pesticide use data includes all pesticides applied within the monitoring site drainage area during the four weeks prior to the measured exceedance	X					
<b>20</b>					<b>Actions Taken to Address Water Quality Exceedances</b>						
	20.1				Discussion of actions taken to address water quality exceedances during the time frame of the AMR is included	X					
	20.2				Actions taken to address the exceedances are adequate	X					
<b>21</b>					<b>Status update on preparation and implementation of all management plans and other special projects</b>						
<b>22</b>					<b>Conclusions and Recommendations</b>						
	22.1				Conclusions are supported by the data presented in the AMR	X					
	22.2				Discussion is adequately detailed	X					
	22.3				Recommendations are appropriate and adequately detailed	X					