

From: Chris Linneman <linneman@summerseng.com>
To: Jelena Hartman <JHartman@waterboards.ca.gov>, Joe McGahan <jmcgahan@summerseng.com>, Parry Klassen <pklassen@unwiredbb.com>
CC: Michael Johnson <mjohnson@mlj-llc.com>, Melissa Turner <mturner@mlj-llc.com>, Susan Fregien <sfregien@waterboards.ca.gov>
Date: 5/24/2012 11:43 AM
Subject: RE: Chlorpyrifos and Diazinon TMDL Annual Monitoring Report 2012
Attachments: PUR_data issues_Example.xls

Hi Jelena,

We are in the middle of our June SAMR and it will be a while before I can address all of the issues. However I would like to directly address the PUR data summary you requested.

We have received PUR data from the county ag commissioners for Fresno, Madera, Merced, Stanislaus, and San Joaquin Counties and have spent more than a day reviewing the data - which contains two very significant issues.

- 1) The PUR data supplied does not contain pounds of AI applied - applied amounts are based on product and units reported (often gallons or ounces).
- 2) The data is largely incomplete, duplicate or simply inaccurate. An attempt to clean up the data set revealed more than 9,000 duplicate records (affected around 18,000 records) and an unknown number of partially completed data entries and apparent duplicate entries with partially complete components. I've attached some common examples of the data quality issues. In the attached file you'll see an apparent duplicate record where one record is complete and the other is missing permittee information, a duplicate set with a different abbreviation for the commodity, and a duplicate set with one record complete and one missing quantity treated and applied information. These are just a few examples and a very large part of the data set is affected.

Per your request, the Westside coalition will generate PUR reports for the requested areas, however it must be noted that we still are questioning the usability of the data which we have repeatedly pointed out. We would like to discuss this further to see if there is an alternate to this high resource activity.

Once we've completed and submitted the June SAMR, we will have a better feel for when we can provide the additional information requested.

Chris Linneman
 Summers Engineering, Inc.
 Phone: (559)582.9237
 Fax: (559)582.7632

Permit	Location (state)	Permittee	Treated dry acres	Crop/Comod	Commodity	Date Applied	EPA#	Product Name	AI	Application	EPA use unit	EPA use unit	Treated units	Treated units	Treated dry acres	EPA use dry gal	EPA use dry lbs	TSS	MTRB	County	Import Date
500090	AZ023	RECHERT FARMS	18	Alfalfa	ALFALFA	04-Apr-11	82719-591AA	LORSBAN ADVANCED	CHLORPYRIFOS	G	1.88	GA	18	18						Stanislaus	
500092	57283		18	Alfalfa	ALFALFA	04-Apr-11	82719-591AA	LORSBAN ADVANCED	CHLORPYRIFOS	G	1.88	GA	18	18						Stanislaus	
One line contains Permittee, one contains EPA Use Lbs																					
500097	548810		40	Spice	PARSLEY	23-May-11		MUSTANG INSECTICIDE	(S)CYPERMETHRIN	A			40	40					Stanislaus	25-Jan-12	
500097	548810		40	Spice	PARSLEY	23-May-11		MUSTANG INSECTICIDE	(S)CYPERMETHRIN	A			40	40					Stanislaus	25-Jan-12	
Entered once with Permittee and once without																					
240150		MONTAGUE PIG FARM	75	Corn	CORN HUMAN CONSUM	08-Aug-11	279-3114AA		BFENTHRIN	A			75	75					Merced	25-Jan-12	
240150		MONTAGUE PIG FARM	75	Corn	CORN HUMAN CON	08-Aug-11	279-3114AA		BFENTHRIN	A			75	75					Merced	25-Jan-12	
Entered twice with different abbreviations for commodity																					
380002	1-2	REECE BROTHERS	29	Alfalfa	ALFALFA	29-Sep-11	82719-79-2A	LOCKON INSECTICIDE	CHLORPYRIFOS	G	31.25	GA	125	125					San Joaquin		
380002	1-2	REECE BROTHERS	29	Alfalfa	ALFALFA	29-Sep-11	82719-79-2A	LOCKON INSECTICIDE	CHLORPYRIFOS	G	31.25	GA	125	125					San Joaquin	24-May-12	
Entered once with Treated dry acres, EPA use dry lbs and TSS and once without																					

From: Jelena Hartman [mailto:JHartman@waterboards.ca.gov]
 Sent: Wednesday, May 23, 2012 11:03 AM
 To: Joe McGahan; Parry Klassen
 Cc: Michael Johnson; Melissa Turner; Chris Linneman; Susan Fregien
 Subject: Re: Chlorpyrifos and Diazinon TMDL Annual Monitoring Report 2012

Dear Parry and Joe,

The review of the Chlorpyrifos and Diazinon TMDL Annual Monitoring Report is under way. A few minor omissions and discrepancies have been noticed in the report:

1. Figures 6 and 7 show monitoring sites for the 2011 water year. Sites 39-44 are shown on the maps but not included in the tributary map key in Table 6. Table 6 should be amended to identify all monitoring sites shown in Figures 6 and 7.
2. Pesticide use data associated with exceedances during the 2011 water year are summarized in Table 26. Table 26 should be amended with information on Ingram Creek (May 2011 sampling event), Del Puerto Creek (May/June 2011), Westley Waterway (June 2011), Hospital Creek (September 2011), Orestimba Creek (April 2011), Marshall Road Drain and Ramona Lake (May 2011) if PUR data are now available. In addition to the number of applications and acres treated, information on the amount of active ingredient applied should be included.
3. Acreage with one or more implemented management practices per each category of practices identified to be effective in reducing the offsite movement of pesticides is presented in Figure 10, while Table 27 summarizes all implemented management practices designed to reduce offsite movement of pesticides in the ESJWQC first and second priority subwatersheds. Figure 10 and Table 27 should be updated to include current practices in the third priority subwatersheds as the information on current management practices, i.e. before the Coalition outreach, has already been collected and compiled (Tables 30-33 in 2012 ESJWQC MPUR).
4. Table 28 provides a summary of management practice inventory in the surveyed subwatersheds in the Westside Coalition region:
 - * total area for Hospital and Ingram Creek subwatersheds are not included and should be added
 - * numbers of surveys collected in Westley Wasteway, Del Puerto and Orestimba Creek subwatersheds are missing and should be added

* questions about spray management practices are included in surveys distributed to growers, and responses should be summarize and included

* a discrepancy in the proportion of acres with Drip/Micro/Sprinkler use at Hospital Creek (47% in the TMDL Annual Monitoring Report, and 68% in the SAMR submitted in November 2011, Table A6-1) for the same number of acres (3515) with the implemented practice should be reconciled

* information on PAM use in Hospital and Ingram Creek subwatersheds should be reconciled with information in the SAMR (Table A6-2 in SAMR), and if there has been a shift in management practices a brief explanation should be included.

5. The counts of chlorpyrifos and diazinon detections from March through August in the Westside Coalition tributaries are presented in Figure 11. Data for the entire year should be included (modify the existing figure, or add a table, figure, or narrative summary), especially given the chlorpyrifos detections/exceedances in September and October in recent years. Adding information on percent of exceedances relative to the total number of samples tested would provide a context for evaluation of water quality over time.

Please let me know if updated versions of the above tables and figures are available, and when they could be submitted?

Thank you,

Jelena

--

Jelena Hartman, PhD
Environmental Scientist
Irrigated Lands Regulatory Program
Central Valley Regional Water Quality Control Board
11020 Sun Center Drive, Suite 200
Rancho Cordova, CA 95670-6114

office: 916.464.4628

fax: 916.464.4780

email: jhartman@waterboards.ca.gov<<mailto:jhartman@waterboards.ca.gov>>

www.waterboards.ca.gov/centralvalley/water_issues/irrigated_lands/<http://www.waterboards.ca.gov/centralvalley/water_issues/irrigated_lands/>

>

--

>>> Rachel West <rwest@mlj-llc.com> 4/30/2012 9:35 AM >>>

Dear Susan,

Attached is the San Joaquin River Chlorpyrifos and Diazinon TMDL Annual Monitoring Report based on 2011 monitoring conducted by the East San Joaquin Water Quality Coalition and the Westside Coalition at the six compliance points.

A hard copy and CD of the report and appendices will be delivered to the Regional Board today. You can find the electronic files on the Sharepoint website under the 'Regional Board Documents' folder (<http://sharepoint.mlj-llc.com/MLJ-DB/database/forms/allitems.aspx>).
username: ftpuser@aqualab.mlj-llc.com<<mailto:ftpuser@aqualab.mlj-llc.com>>
password: Aqua2011!

The cover letter is being signed by Joe McGahan and Parry Klassen and will be mailed into the Regional Board. Please let me know if you have any questions.

Thanks,

~~~~~

Rachel C. West  
Environmental Scientist  
Michael L. Johnson LLC  
632 Cantrill Drive  
Davis, CA 95618

Tel: 530-756-5200<<tel:530-756-5200>>

Fax: 530-756-5225<<tel:530-756-5225>>

[rwest@mlj-llc.com](mailto:rwest@mlj-llc.com)<<mailto:rwest@mlj-llc.com>>