

From: Jelena Hartman
To: Klassen, Parry; Linneman, Chris; McGahan, Joe
CC: Fregien, Susan; Johnson, Michael; Turner, Melissa
Date: 5/24/2012 4:28 PM
Subject: RE: Chlorpyrifos and Diazinon TMDL Annual Monitoring Report 2012

Hi Chris,

I understand that you are busy with the June SAMR, it is fine to address issues from the TMDL AMR when the SAMR is completed.

Thank you for sending the file with examples of issues with PUR data. You explained well the problems with PUR data at the last Quarterly Meeting, and the spreadsheet further illustrates your points about amounts of AI applied, incomplete records, and duplicate entries. I agree that until finalized data are available through CalPIP, PUR data summaries should be considered draft. The lag between the application, reported use, and acquisition and processing of data also affects the utility of the PUR data. And as you pointed out earlier, it is often not possible to relate an exceedance to a specific application.

However, while of limited utility on their own, preliminary PUR data in combination with other information can help identify trends in use, crops, and area of application, and tailor outreach and management practices in a specific area. Of course, steps to clean up the dataset should be documented (queries in Access or filters/data tools in Excel to consolidate records and remove duplicates), and draft PUR data should be used with caution (and limitations in mind).

Please let me know if there are questions about any of the items when you start to work on updating the TMDL AMR.

Best regards,

Jelena

>>> Chris Linneman <linneman@summerseng.com> 5/24/2012 11:42 AM >>>
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
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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:
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. 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.

Acres 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). 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.

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

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>>> 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
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
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