

ATTACHMENT G – NOTICE OF INTENT

RECEIVED

MAR 07 2011

WATER QUALITY ORDER NO. 2011-XXXX-DWQ
GENERAL PERMIT NO. CAG XXXXXX

DIVISION OF WATER QUALITY

STATEWIDE NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM PERMIT
FOR BIOLOGICAL AND RESIDUAL PESTICIDE DISCHARGES TO WATERS OF THE
UNITED STATES
FROM VECTOR CONTROL APPLICATIONS

I. NOTICE OF INTENT STATUS (see Instructions)

Mark only one item A. New Applicator B. Change of Information: WDID# _____
 C. Change of ownership or responsibility: WDID# _____

II. DISCHARGER INFORMATION

A. Name <i>LOS ANGELES COUNTY WEST VECTOR CONTROL DISTRICT</i>			
B. Mailing Address <i>6750 CENTINELA BLVD.</i>			
C. City <i>CULVER CITY</i>	D. County <i>LOS ANGELES</i>	E. State <i>CA</i>	F. Zip Code <i>90804</i>
G. Contact Person <i>ROBERT SAVISKAS</i>	H. Email address <i>RSAVISKAS@ lawestvector.org</i>	I. Title <i>EXECUTIVE DIRECTOR</i>	J. Phone <i>(310) 915-7370 X223</i>

III. BILLING ADDRESS (Enter Information only if different from Section II above)

A. Name			
B. Mailing Address			
C. City	D. County	E. State	F. Zip Code
G. Email address	H. Title	I. Phone	

IV. RECEIVING WATER INFORMATION

A. ~~Pesticide residues~~ Biological and residual pesticides discharge to (check all that apply)*:

1. Canals, ditches, or other constructed conveyance facilities owned and controlled by Discharger.
 Name of the conveyance system: _____

2. Canals, ditches, or other constructed conveyance facilities owned and controlled by an entity other than the Discharger.
 Owner's name: LOS ANGELES COUNTY PUBLIC WORKS, CALTRANS
Name of the conveyance system: DRAINAGE CHANNELS, STORMWATER BMPs

3. Directly to river, lake, creek, stream, bay, ocean, etc.
 Name of water body: MALIBU CREEK, MALIBU LAGOON, LOS ANGELES RIVER, DOMINGUEZ CHANNEL, BALLONA CREEK, BALLONA WETLANDS.
* A map showing the affected areas for items 1 to 3 above may be included.

B. Regional Water Quality Control Board(s) where application areas are located (REGION 1, 2, 3, 4, 5, 6, 7, 8, or 9): Region 4
(List all regions where pesticide application is proposed.)

A map showing the locations of A1-A3 in each Regional Water Board shall be included.

V. PESTICIDE APPLICATION INFORMATION

A. Target Organisms: Vector Larvae _____ Adult Vector _____

B. Pesticides Used: List Name name, and a Active ingredients and, if known, degradation by-products
SEE ATTACHED TABLE

C. Period of Application: Start Date 01/01/2011 End Date ON GOING

D. Types of Adjuvants Added by the Discharger:

VI. PESTICIDES APPLICATION PLAN

A. Has a Pesticides Application Plan been prepared?*

Yes No

If not, when will it be prepared? _____

* A copy of the PAP shall be included with the NOI.

B. Is the applicator familiar with its contents?

Yes No

TENTATIVE ORDER

VII. NOTIFICATION

Have potentially affected governmental agencies been notified?

Yes No

* If yes, a copy of the notifications shall be attached to the NOI.

VIII. FEE

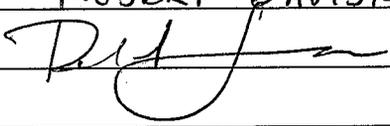
Have you included payment of the filing fee (for first-time enrollees only) with this submittal?

Yes NO NA

IX. CERTIFICATION

"I certify under penalty of law that this document and all attachments were prepared under my direction and supervision in accordance with a system designed to ensure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine or imprisonment. Additionally, I certify that the provisions of the General Permit, including developing and implementing a monitoring program, will be complied with."

A. Printed Name: ROBERT SAVISKAS

B. Signature: 

Date: 3/3/11

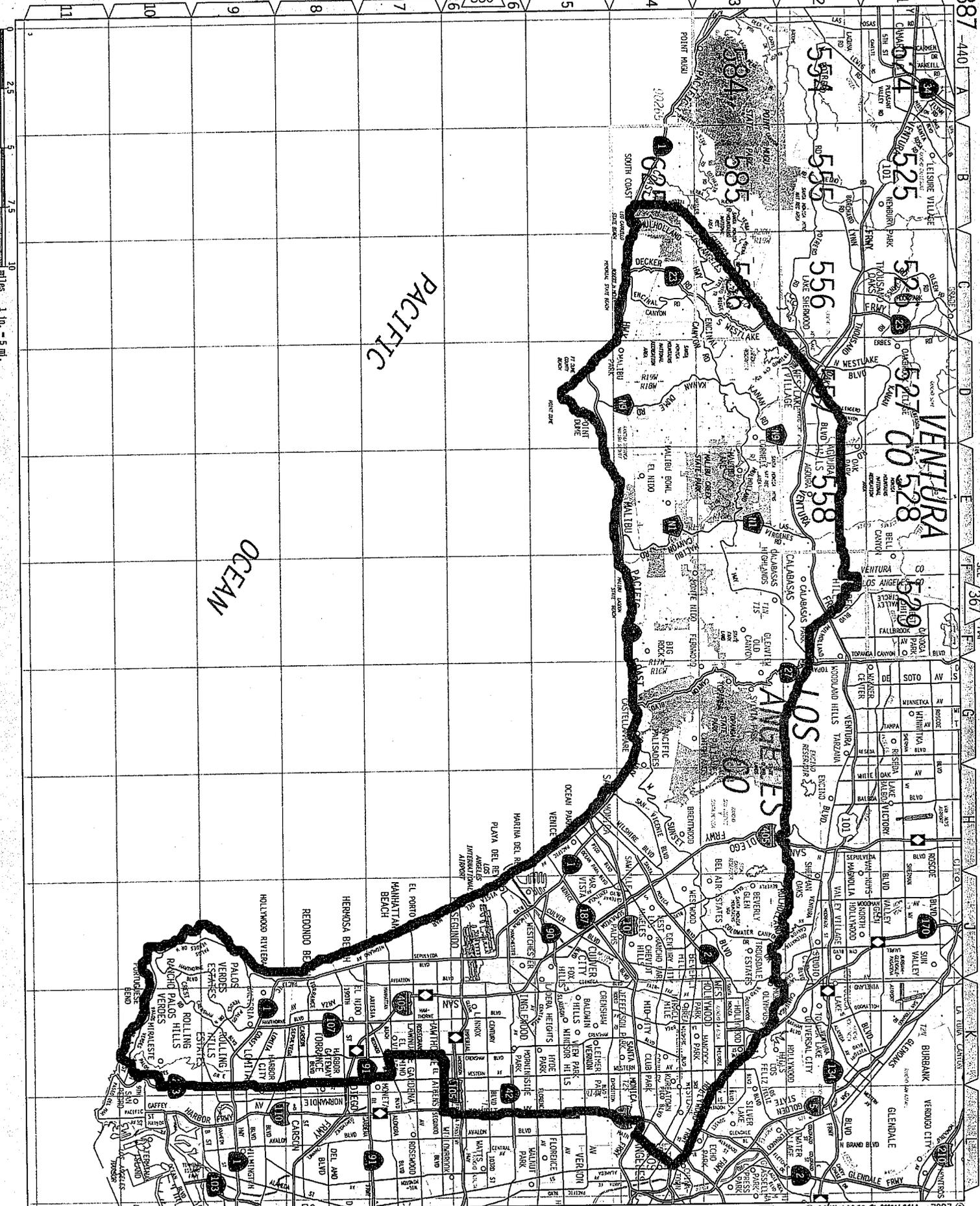
C. Title: _____

PERMITATIVE

X. FOR STATE WATER BOARD USE ONLY

WDID:	Date NOI Received:	Date NOI Processed:
Case Handler's Initial:	Fee Amount Received: \$	Check #:

ORDER



PACIFIC

OCEAN

VENTURA

LOS ANGELES

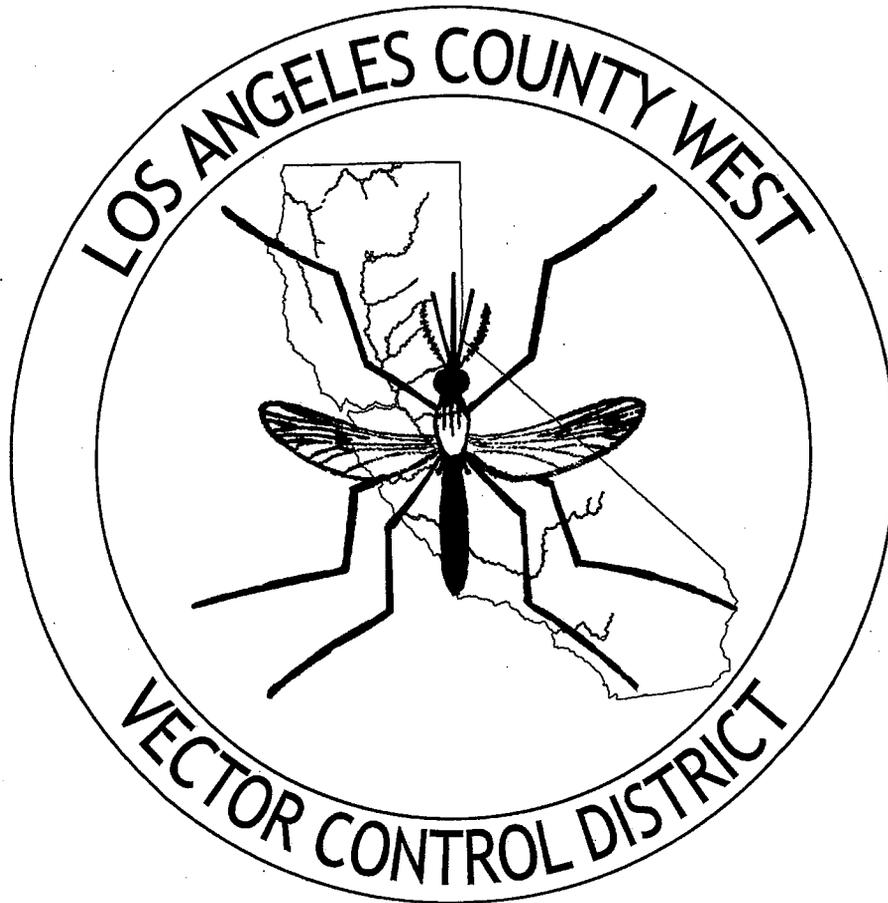
0 2.5 5 7.5 10 11 miles 1 in. = 5 mi.

Chemical Name	Active Ingredient
Agnique MMF	Poly(oxy-1,2-ethanediyl), α -isooctadecyl- ω -hydroxyl
Agnique MMF-G	Poly(oxy-1,2-ethanediyl), α -isooctadecyl- ω -hydroxyl
Altosid Briquets	Methoprene
Altosid Briquets XR	Methoprene
Altosid XR-G	Methoprene
Altosid Pellets	Methoprene
Altosid Liquid	Methoprene
Bactimos Briquets	<i>Bacillus thuringiensis</i> var. <i>israelensis</i>
Vectobac AS	<i>Bacillus thuringiensis</i> var. <i>israelensis</i>
Vectobac Granules	<i>Bacillus thuringiensis</i> var. <i>israelensis</i>
Vectolex CG	<i>Bacillus sphaericus</i>

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Pesticide Application Plan (PAP)

The NPDES Permit requires a Pesticides Application Plan (PAP) that contains the following elements:

- a. Description of the target area and adjacent areas, if different from the water body of the target area;**
See attached map and list of cities and zip codes contained within the District's boundaries.
- b. Discussion of the factors influencing the decision to select pesticide applications for mosquito control;**
Please see the Best Management Practices for Mosquito Control in California and the Los Angeles County West Vector Control District's Best Management Practices for Mosquito Control
- c. Type(s) of pesticides used, the method in which they are applied, and if applicable, the adjuvants and surfactants used;**
Please see the Best Management Practices for Mosquito Control in California and the Los Angeles County West Vector Control District's Best Management Practices for Mosquito Control
- d. Description of the types and locations of the anticipated application area* and the target area to be treated by the Discharger, recognizing that, with vector control, the precise locations may not be known until after surveillance;**

Any site that holds water for more than 96 hours (4 days) can produce mosquitoes. Source reduction is the District's preferred solution, and whenever possible the District works with property owners to effect long-term solutions to reduce or eliminate the need for continued applications as described in Best Management Practices for Mosquito Control in California. The typical sources treated by this District include:

Box Drain	Catch Basin	Container	Creek/River
Curb	Drainage Channel	Excess Water	Marsh
Oil Sump	Pond/Pool	Septic Tank	Underground Drain

- e. Other control methods used (alternatives) and their limitations;**

With any mosquito or other vector source, the District's first goal is to look for ways to eliminate the source, or, if that is not possible, for ways to reduce the vector potential. The most commonly used methods and their limitations are included in the Best Management Practices for Mosquito Control in California and the Los Angeles County West Vector Control District's Best Management Practices for Mosquito Control.

In all instances, the use of chemical control methods are a last resort after options such as using mosquito fish (*Gambusia affinis*) or source removal have been eliminated. The District attempts to use mosquito fish whenever possible, especially in sources that contain water year-round; in fact, the District was successful in establishing a population of mosquito fish in such an inhospitable location as the lake at the La Brea Tar Pits. The District has an active Public Education department that educates residents concerning mosquito development, control and the diseases they transmit and encourages the removal of sources of standing water on their property. The District also provides mosquito fish free of charge to residents within the District and instructions are provided concerning the locations where these fish may/may not be used.

f. Approximately how much product is anticipated to be used and how this amount was determined

Chemical Name	2010 Amount Applied
Agnique MMF	65.48 gal
Agnique MMF-G	3.07 lbs
Altosid Briquets (methoprene)	114.75 lbs
Altosid Briquets XR (methoprene)	356.88 lbs
Altosid XR-G (methoprene)	109.10 lbs
Altosid Pellets (methoprene)	1247.22 lbs
Altosid Liquid (methoprene)	16.9 gal
Bactimos Briquets (<i>Bacillus thuringiensis</i> var. <i>israelensis</i>)	24.25 lbs
Vectobac AS (<i>Bacillus thuringiensis</i> var. <i>israelensis</i>)	222.28 gal
Vectobac Granules (<i>Bacillus thuringiensis</i> var. <i>israelensis</i>)	14338.38 lbs
Vectolex CG (<i>Bacillus sphaericus</i>)	7061.91 lbs

The table above lists the amount and types of product used within our district boundaries for 2010 and represent an approximation of product to be used in 2011.

g. Representative monitoring locations* and the justification for selecting these monitoring locations

Please see the MVCAC NPDES Coalition Monitoring Plan

h. Evaluation of available BMPs to determine if there are feasible alternatives to the selected pesticide application project that could reduce potential water quality impacts; and

Please see the Best Management Practices for Mosquito Control in California and the Los Angeles County West Vector Control District's Best Management Practices for Mosquito Control

i. Description of the BMPs to be implemented

Please see the Best Management Practices for Mosquito Control in California and the Los Angeles County West Vector Control District's Best Management Practices for Mosquito Control

2. The Discharger shall update the PAP periodically and submit the revised PAP to the State Water Board for approval if there are any changes to the original PAP.

D. Best Management Practices (BMPs)

The Discharger shall develop BMPs that contain the following elements:

The District's BMPs are described in the Best Management Practices for Mosquito Control in California and the California Mosquito-borne Virus Surveillance and Response Plan.

1. Description of the BMPs to be implemented.

The BMPs shall include, at the minimum:

a. Measures to prevent pesticide spill;

District staff monitors application equipment on a daily basis to ensure it remains in proper working order. Spill mitigation devices are placed in all spray vehicles and pesticide storage areas to respond to spills. Employees are trained on spill prevention and response annually.

b. Measures to ensure that only a minimum and consistent amount is used;

Spray equipment is calibrated on a monthly basis and is part of the MOU with CDPH.

c. a plan to educate Coalition's or Discharger's staff and pesticide applicator on any potential adverse effects from the pesticide application;

Applicators are licensed by the State of California as Vector Control Technicians and are required to complete annual pesticide training.

d. Descriptions of specific BMPs for each spray mode. e.g. aerial spray, truck spray, hand spray, etc.; cease and desist order

All spray equipment used in larviciding applications is calibrated on a monthly basis to meet application specifications. Supervisors review spray records daily to ensure appropriate amounts of material are being used. ULV equipment is calibrated for output and droplet size to meet label requirements. Airplanes used in urban ULV applications and the primary airplane used for rural ULV spraying is equipped with advanced guidance and drift management equipment to ensure the best available technology is being used to place product in the intended spray area. If a secondary airplane is used in rural ULV applications it will be equipped with an advanced guidance system.

e. descriptions of specific BMPs for each pesticide product used; and

Please see Los Angeles County West Vector Control District's Best Management Practices for Mosquito Control

f. Descriptions of specific BMPs for each type of environmental setting (agricultural, urban, and wetlands).

Please see Los Angeles County West Vector Control District's Best Management Practices for Mosquito Control

2. Identify the Problem

Prior to first pesticide application covered under this General Permit that will result in a discharge of residual pesticides to waters of the US, and at least once each calendar year thereafter prior to the first pesticide application for that calendar year, the Discharger must do the following for each vector management area:

a. Establish densities for larval and adult vector populations to serve as action threshold(s) for implementing pest management strategies

Only those mosquito sources that District staff determine to represent imminent threats to public health or quality of life are treated. The presence of any mosquito may necessitate treatment, however higher thresholds may be applied depending on the District's resources, disease activity, or local needs. Treatment thresholds are based on a combination of one or more of the following criteria:

- Mosquito species present
- Mosquito stage of development
- Pest, nuisance, or disease potential
- Disease activity
- Mosquito abundance
- Flight range
- Proximity to populated areas
- Size of source
- Presence/absence of natural enemies or predators
- Presence of sensitive/endangered species or habitats.

b. Identify target vector species to develop species-specific pest management strategies based on developmental and behavioral considerations for each species;

Please see the Best Management Practices for Mosquito Control in California and the California Mosquito-borne Virus Surveillance and Response Plan.

c. Identify known breeding areas for source reduction, larval control program, and habitat management; and

Any site that holds water for more than 96 hours (4 days) can produce mosquitoes. Source reduction is the District's preferred solution, and whenever possible the District works with property owners to implement long-term solutions to reduce or eliminate the need for continued applications as described in Best Management Practices for Mosquito Control in California.

- d. **Analyze existing surveillance data to identify new or unidentified sources of vector problems as well as areas that have recurring vector problems.**

This is included in the Best Management Practices for Mosquito Control in California and the California Mosquito-borne Virus Surveillance and Response Plan that the Districts uses. The District continually collects adult and larval mosquito surveillance data, dead bird reports, and sentinel chicken test results and uses them to guide mosquito control activities.

3. **Examine the Possibility of Alternatives to Treatments**

Dischargers should continue to examine the possibility of alternatives to reduce the need for applying larvicides that contain temephos and for spraying adulticides. Such methods include:

- a. **Evaluating management and treatment options that may impact water quality, non-target organisms, vector resistance, feasibility, and cost effectiveness, such as:**

- No action
- Source prevention
- Mechanical or physical source reduction methods
- Cultural methods
- Biological control agents
- Pesticides

- b. **Applying pesticides only when vectors are present at a level that will constitute a nuisance or threat to public health**

- c. **Using the least intrusive method of pesticide application.**

- d. **Public education efforts to reduce potential vector breeding habitat.**

- e. **Applying a decision matrix concept to the choice of the most appropriate formulation.**

This describes the District's existing integrated vector management (IVM) program, as well as the practices described in the California Mosquito-borne Virus Surveillance and Response Plan and Best Management Practices for Mosquito Control in California that are used by this agency.

4. **Correct Use of Pesticides**

Users of pesticides must ensure that all reasonable precautions are taken to minimize the impacts caused by pesticide applications. Reasonable precautions include using the proper spraying techniques and equipment, taking account of weather conditions and the need to protect the environment.

- a. **All errors in application and spills are reported to the proper authority.**

- b. **Staff training in the proper application of pesticides and handling of spills.**

This is an existing practice of the District, and is required to comply with the Department of Pesticide Regulation's (DPR) requirements and the terms of our California Department of Public Health (CDPH) Cooperative Agreement. All pesticide applicators receive annual safety and spill training in addition to their regular continuing education.

E. Pesticide Application Log

The Discharger shall maintain a log for each pesticide application. The application log shall contain, at a minimum, the following information, when practical, for larvicide or adulticide applications:

- 1. Date of application;**
- 2. Location of the application and target areas (e.g., address, crossroads, or map coordinates);**
- 3. Name of applicator;**
- 4. The names of the water bodies treated if known/ named(i.e., canal, creek, lake, etc.);**
- 5. Application details, such as when the application started and stopped, pesticide application rate and concentration, water flow rate of the target area, surface water area, volume of water treated, pesticide(s) and adjuvants used by the Discharger, and volume or mass of each component discharged;**

This is an existing practice of the District as required to comply with DPR regulations and our CDPH Cooperative Agreement requirements.

References:

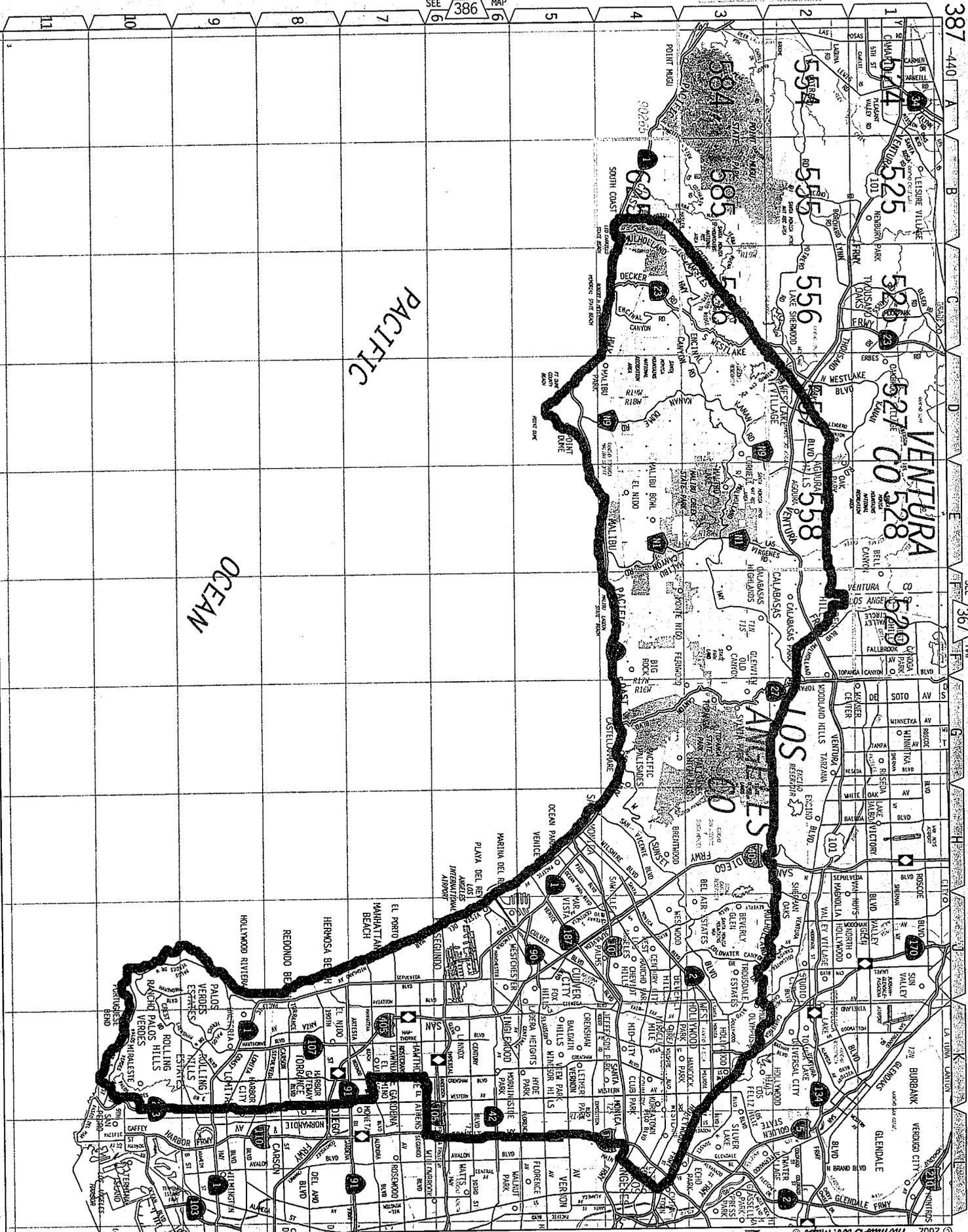
Best Management Practices for Mosquito Control in California. 2010. Available from the California Department of Public Health—Vector-Borne Disease Section, (916) 552-9730 or by download from <http://www.westnile.ca.gov/resources.php> under the heading Mosquito Control and Repellent Information.

California Mosquito-borne Virus Surveillance and Response Plan. 2010. [Note: this document is updated annually by CDPH]. Available from the California Department of Public Health—Vector-Borne Disease Section, (916) 552-9730 or by download from <http://www.westnile.ca.gov/resources.php> under the heading Mosquito Control and Repellent Information.

Los Angeles County West Vector Control District's Best Management Practices for Mosquito Control. 2010. Available from the Los Angeles County West Vector Control District (310) 915-7370.

MVCAC NPDES Coalition Monitoring Plan. 2011. Please see the MVCAC Monitoring and Reporting Program. Please call the Los Angeles County West Vector Control District (310) 915-7370 with any questions.

0 2.5 5 7.5 10 miles 1 in. = 5 mi.



PACIFIC

OCEAN

VENTURA

SANTA BARBARA

VENTURA CO

SANTA BARBARA CO

SERVICE AREAS

Agoura Hills	91301
Beverly Hills	90210, 90211, 90212, 90213
Calabasas	91302
Culver City	90230, 90231, 90232
El Segundo	90245
Hawthorne	90250
Hermosa Bch	90254
Hidden Hills	91302
Inglewood	90301, 90302, 90303, 90304, 90305
Lawndale	90260, 90261
Lomita	90717
Malibu	90263, 90264, 90265
Manhattan Bch	90266
Palos Verdes Estates	90274
Rancho Palos Verdes	90275
Redondo Beach	90277, 90278
Rolling Hills	90274
Rolling Hills Estates	90278
Santa Monica	90401, 90402, 90403, 90404, 90405
Torrance	90501, 90503, 90504, 90505, 90506
West Hollywood	90048, 90069
Westlake Village	91361, 91362

Los Angeles City (portions of)*

*zip codes: 90004, 90005, 90006, 90007, 90008, 90010, 90012, 90015, 90016, 90017, 90018, 90019, 90020, 90024, 90025, 90026, 90028, 90029, 90034, 90035, 90036, 90037, 90038, 90045, 90046, 90047, 90048, 90049, 90057, 90062, 90064, 90066, 90067, 90068, 90069, 90073, 90077, 90089, 90094, 90272, 90291, 90293, 91364

Los Angeles County (portions of)**

**zip codes: 90043, 90044, 90056, 90292, 90290,

90502 is classified outside of the District