

## Development of TMDL for Dormant Spray OP Pesticide Toxicity Control

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As a follow-up to the March 29 meeting of the Sacramento/ Feather River OP Pesticide Focus Group, where I suggested that, in light of the severe time constraints that exist, this group needs to begin to focus on developing TMDLs for controlling OP pesticide dormant spray-caused aquatic life toxicity in the Sacramento River and Feather River systems, I wish to provide the following comments. It is my understanding that the US EPA has specific guidance on the components of the TMDL that must be addressed to meet their needs. It seems appropriate that a draft TMDL be developed, along with a proposed implementation plan, for each of the potential targets that could be used as a TMDL goal for control of OP pesticide aquatic life toxicity.

I suggest that an individual or a small group representing a potential target be assigned the responsibility of developing a draft TMDL for a specific goal and an implementation plan to achieve that goal. Adoption of this approach will quickly bring to the forefront issues for which there is need for additional information, potential problems associated with achieving a particular goal, and will prove to be highly educational to the group about the nature of the TMDL process that the group is involved in. Basically, I am advocating greatly accelerating when this group begins to focus on discussion of the key issues that ultimately will have to be addressed as part of TMDL development and implementation.

I wish to suggest the following individuals/groups for developing a draft TMDL for the goals indicated and implementation plans to achieve those goals:

Responsible Group CVRWQCB Staff	Goal US EPA and DFG Criterion
Registrants	Ecological Risk Assessment
DPR	No Significant Adverse Impact to Beneficial Uses
Growers	Optimum Pest Management at Least Cost
Environmental Groups/Lee	No Toxicity, Considering Potential Additives/Synergistic Impacts of Other Pesticides

Each of these goals/implementation plans should include a discussion of the anticipated monitoring program that would be conducted during Phase I of the implementation plan. It should be assumed that Phase I covers a five-year period, where, at the end of four years, a revision of the goal/implementation plan would be contemplated.

If the US EPA's guidance on TMDL development does not include guidance on formulating an implementation plan, the CVRWQCB/State Board needs to immediately develop guidance on how this should be done.

Adopting this approach will help move this group toward the development of TMDLs to meet the range of goals that are possible. It will also help educate the group on what the implementation plan will look like in terms of achieving these goals.

This process could ultimately lead to the Sacramento River Watershed Program's development of a pesticide management plan which would represent an appropriate blend of the goals and implementation plans from the various stakeholders.

If there are questions about this suggested approach, please contact me. I welcome comments on it. It will serve as a clearing house to help stimulate addressing these issues.

Fred