



Lahontan Regional Water Quality Control Board

June 30, 2020

Interested Agencies and Parties

Request for Comments - Proposed Cleanup and Abatement Order Requiring Ramiro Avila to Cleanup and Abate the Discharge and Threatened Discharge of Sediment to Surface Waters of the Antelope Hydrologic Unit— Vicinity of 126th Street East and Nearwood Road, Pearblossom, Los Angeles County, APN 3060-020-043

Written comments due no later than 5:00 p.m., July 24, 2020.

Enclosed is a proposed Cleanup and Abatement Order (Order) for the cleanup and abatement of discharges and threatened discharges of wastes associated with cannabis cultivation on Los Angeles County Assessor Parcel Number 3060-020-043 (the Site). The Water Board is extending the original 30-day public review and comment period in response to revising compliance dates in the proposed Order.

The proposed Order names Ramiro Avila (Discharger), owner of the above-referenced parcel, as the responsible party for discharges of excavated sediment into two unnamed ephemeral surface waters for the purpose of outdoor cannabis cultivation. The discharges have resulted in violations of waste discharge prohibitions contained in the Water Board's Water Quality Control Plan for the Lahontan Region.

The proposed Order requires the Discharger to submit and implement a mitigation plan to restore the site, prevent further discharges, provide updates on restoration work, and to monitor the site for five years following the completion of restoration.

The Water Board is requesting your review and comments upon the proposed Order (enclosed). The proposed Order can also be viewed at the Water Board's webpage at: http://www.waterboards.ca.gov/lahontan.

All comments regarding the proposed Order must be received by the Water Board no later than **5:00 p.m. on July 24, 2020**. Written comments should include "Avila CAO Comments" in the subject line and be emailed to: RB6enfproceed@waterboards.ca.gov.

For those who do not have access to email, submit your written comments to:

Lahontan Regional Water Quality Control Board 2501 Lake Tahoe Blvd South Lake Tahoe, CA 96150 Attn: Avila CAO Comments

PETER C. PUMPHREY, CHAIR | PATTY Z. KOUYOUMDJIAN, EXECUTIVE OFFICER

If you have any questions regarding this matter, please contact Eric Taxer, Senior Water Resource Control Engineer, at (530) 542-5434 (<u>Eric.Taxer@waterboards.ca.gov</u>), or me at (530) 542-5432 (<u>Scott.Ferguson@waterboards.ca.gov</u>).

Scott C. Ferguson

Supervising Water Resource Control Engineer

Enclosure: Cleanup and Abatement Order No. R6V-2020-PROPOSED

cc: Avila CAO Mailing List

Eric Taxer, Lahontan Water Board

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD LAHONTAN REGION CLEANUP AND ABATEMENT ORDER NO. R6V-2020-(PROPOSED) FOR RAMIRO VILLA AVILA LOS ANGELES COUNTY ASSESSOR PARCEL NO. 3036-020-043 WDID 6B191908004

This Order is issued to Ramiro Villa Avila (hereinafter referred to as the Discharger) based on the provisions of Water Code section 13304, which authorizes the Lahontan Regional Water Quality Control Board (Lahontan Water Board or Regional Water Board) to issue an order requiring the cleanup and abatement of wastes, and Water Code section 13267, which authorizes the Lahontan Water Board to require the preparation and submittal of technical and monitoring reports.

FINDINGS

The Lahontan Water Board, with respect to the Discharger's acts, or failure to act, finds:

Purpose and Scope

- 1. This Order requires the Discharger to clean up and abate discharges and threatened discharges of soil, nutrient rich wastewaters, fertilizers, and pesticides associated with cannabis cultivation activities within the Antelope Valley groundwater basin and the Antelope Hydrologic Unit. These discharges and threatened discharges are a result of cannabis cultivation activities on Los Angeles County Assessor Parcel Number (APN) 3060-020-043 (the Site). The Site is located in the vicinity of Nearwood Road and 126th Street East (34.4367817833333, -117.90206535), south of Pearblossom, an unincorporated community of Los Angeles County. The activities conducted at the Site have previously discharged wastes and threaten future discharges of wastes to the local groundwater basin and to surface waters of the local hydrologic unit without authorization from applicable federal, state, and local agencies, including the Lahontan Water Board.
- 2. The investigation and cleanup required by this Order is to be in compliance with the Porter-Cologne Water Quality Control Act (Wat. Code §13000 et seq.), the Water Quality Control Plan for the Lahontan Region (Basin Plan), State Water Resources Control Board (State Water Board) Resolution No. 92-49 Policies and Procedures for Investigation and Cleanup and Abatement of Discharges under Water Code section 13304 (Resolution 92-49), and other applicable State and Regional Water Board plans, policies, and regulations.

Site Specific Information

Property Owner Liability

3. The Discharger owns the Site and is the responsible party for the purpose of complying with this Order. A search of the online real estate application LandVision indicates the Discharger purchased the parcel, identified as Los Angeles County APN 3060-020-043 (APN 3060-02-043), on November 16, 2018 and remains the current owner.

Watershed Description

4. The Site is an approximately 10-acre parcel located on an alluvial fan on the north slope of the San Gabriel Mountains. The Site is within the Antelope Valley groundwater basin and contains surface waters that are part of the Antelope Hydrologic Unit. Two desert washes roughly 830-foot-long originate on the south portion of the Site, flow north, converge offsite, and then flow approximately 270 feet downstream to join an unnamed, ephemeral, National Hydrography Dataset (NHD) mapped stream. Approximately 3,400 feet downstream of this confluence, the unnamed NHD stream joins Pallett Creek, which ultimately joins the Big Rock Wash approximately 2.7 miles northeast of the Site.

Enrollment Status

5. The State Water Board adopted General Waste Discharge Requirements and Waiver of Waste Discharge Requirements for Discharges of Waste Associated with Cannabis Cultivation Activities, Order No. WQ 2019-0001-DWQ¹ (General Order) on February 5, 2019. As of March 1, 2020, the Site does not have any approved or pending applications for cannabis cultivation under the State Water Board's General Order. Outdoor cannabis cultivation is banned in unincorporated areas of Los Angeles County.

Chronology

- 6. On August 14, 2019, the Los Angeles County Sheriff's Department obtained a search warrant from the Superior Court of California, North Judicial District of Los Angeles County for APN 3060-020-043. The warrant authorized Lahontan Water Board staff to participate in the search to inspect for water quality violations related to cannabis cultivation.
- 7. On August 16, 2019, Lahontan Water Board staff conducted an inspection of the Site under the authority of the search warrant. The August 16, 2019 inspection report is included in Attachment 1 of this Order. During the inspection, Lahontan Water Board staff observed impacts to two surface water drainages, including the following: cannabis cultivation, improper storage of various chemical cultivation

¹ Available at:

supplies, large-scale grading, discharge of sediment, and the disposal of trash and human waste.

- a. The natural grade of two drainages on the Site was altered by cutting the drainage banks and filling the drainage channels with an estimated 229,703 gallons of native soil. In these drainages, native vegetation was removed and two hoop houses were constructed to facilitate cannabis cultivation.
- b. Cannabis was being grown directly in the ground that had been dug and filled with potting soil. Young cannabis plants were present within a western hoop house. The plants in an eastern hoop house had been harvested. Lahontan Water Board staff collected a soil sample of the potting soil in the western hoop house and detected concentrations of pesticides (hexachlorobenzene, dicofol, dichlorvos, demetono, demetons, diazinon, and disulfoton). The August 16, 2019 Site soil sample analytical results are included in this Order as Attachment 2.
- c. Cultivation-related waste was located throughout the Site including containers of fertilizers, pesticides, and growth media that were stored directly on the ground without secondary containment.
- 6. On October 21, 2019, Lahontan Water Board staff issued the Discharger a Notice of Violation (NOV) for unauthorized discharges related to cannabis cultivation and unpermitted grading within two surface water drainages. The NOV is included as Attachment 1 to this Order.
- 7. On October 29, 2019, Raquel Villa signed the United States Postal Service certified mail tracking receipt for the Notice of Violation (NOV) addressed to the Discharger. Lahontan Water Board staff performed an online search that identified Raquel Villa [Torres] as the Discharger's relative.
- 8. On January 24, 2020 the Discharger called staff and left a voicemail indicating knowledge of the issued NOV, referencing the Site by APN, and left a contact phone number.
- 9. On March 6, 2020 Lahontan Water Board staff returned the Discharger's call and left the Discharger a voicemail message. As of April 27, 2020, Lahontan Water Board staff has not received a response from the Discharger.
- 10. To date, Lahontan Water Board staff have not received any indication that the Discharger has taken corrective action to restore the disturbed drainages or to prevent further discharges to waters of the state.

Regulatory Authority

Definitions

- 11. "Waste" includes sewage and any and all other waste substances, liquid, solid, gaseous, or radioactive, associated with human habitation, or of human or animal origin, or from any producing, manufacturing, or processing operation, including waste placed within containers of whatever nature prior to, and for the purpose of, disposal, as defined by Water Code section 13050, subdivision (d).
- "Waters of the state" are any surface or groundwater, including saline waters, within the boundaries of the state, as defined by Water Code section 13050, subdivision (e).
- 13. "Pollution" is an alteration of the quality of the waters of the state by waste to a degree which unreasonably affects the waters for beneficial uses or facilities which serve such beneficial uses, as defined by Water Code section 13050, subdivision (I)(1).

Basin Plan Requirements

- 14. The Basin Plan designates beneficial uses, establishes water quality objectives, contains implementation programs for achieving objectives, and incorporates by reference plans and policies adopted by the State Water Board. The Site is located within the Antelope Hydrologic Unit and the Antelope Valley groundwater basin identified in the Basin Plan.
 - a. The designated beneficial uses for minor surface waters of the Antelope Hydrologic Unit include:
 - Municipal and Domestic Supply (MUN)
 - Agricultural Supply (AGR)
 - Freshwater Replenishment (FRSH)
 - Ground Water Recharge (GWR) Wildlife Habitat (WILD)
 - b. The designated beneficial uses for the Antelope Valley groundwater basin include:
 - Municipal and Domestic Supply (MUN)
 - Agricultural Supply (AGR)
 - Freshwater Replenishment (FRSH)
 - Industrial Service Supply (IND)
- 15. The Basin Plan contains, under the authority of Water Code section 13243, enforceable waste discharge prohibitions that apply to the entire Lahontan Region. The Basin Plan is available at:
 - https://www.waterboards.ca.gov/lahontan/water_issues/programs/basin_plan/Chapter 4 of the Basin Plan contains applicable waste discharge prohibitions.

- c. Prohibition 3 forbids the discharge of waste that could affect the quality of waters of the state that is not authorized by the State Water Board or the Lahontan Water Board through waste discharge requirements or other appropriate regulatory mechanism.
- d. Prohibition 4 forbids the discharge of solid waste into surface waters of the Lahontan Region.
- 16. The State Water Board has adopted Resolution No. 92-49, which is included in Appendix B of the Basin Plan. Resolution No. 92-49 sets forth the policies and procedures to be used during an investigation and cleanup of a polluted site and requires that cleanup levels be consistent with State Water Board Resolution No. 68-16, the Statement of Policy with Respect to Maintaining High Quality Waters in California (Resolution No. 68-16). Resolution No. 92-49 requires waste to be cleaned up in a manner that promotes attainment of either background water quality, or the best water quality which is reasonable if background levels of water quality cannot be restored. Any alternative cleanup level to background must: (1) be consistent with the maximum benefit to the people of the state; (2) not unreasonably affect present and anticipated beneficial use of such water; and (3) not result in water quality less than that prescribed in the Basin Plan and applicable Water Quality Control Plans and Policies of the State Water Board. Resolution No. 92-49 directs that investigations proceed in a progressive sequence. To the extent practical, it directs the State and Regional Water Boards to require and review for adequacy written work plans for each element and phase, and the written reports that describe the results of each phase of the investigation and cleanup.

Unauthorized Discharge of Waste

- 17. The drainages above, on, and downstream of the Site are surface waters within the boundaries of the state, and are waters of the state, as defined in Finding No. 14, above.
- 18. The groundwater upgradient, beneath, and downgradient of the Site is located within the boundaries of the state; and are waters of the state, as defined by Finding No. 14, above.
- 19. The discharge of earthen material to fill the Site's drainages, and the discharge of human waste, fertilizers, pesticides, and trash into the Site's drainages as described in Finding No. 7, above, and documented in Lahontan Water Board staff's inspection report (Attachment 1), constitute discharges of waste to waters of the state.
- 20. Chemical use and improper chemical storage at the Site have the potential to result in a discharge of waste to the Site's drainages and underlying groundwater and constitute a threatened discharge of waste to waters of the state. The chemicals use and improper chemical storage at the Site also have the ability to

affect the quality of waters of the state to a degree that can adversely affect the beneficial uses of the waters. These conditions constitute an ongoing condition of threatened pollution, as defined in Finding No. 15, above.

Violations

21. The discharge of the wastes to waters of the state described in Finding Nos. 7 and 21, above, and documented in Lahontan Water Board staff's inspection report (Attachment 1) has the ability to affect the quality of waters of the state at and downstream of the Site. A review of Lahontan Water Board and State Water Board records do not contain any documentation that the Discharger obtained authorization from either the Lahontan Water Board or State Water Board to discharge these wastes to waters of the state. Such unauthorized discharges of waste to waters of the state violate the Basin Plan waste discharge prohibitions described in Finding Nos. 17.a. and 17.b., above.

Water Code section 13304 and Enforcement Policy

22. Water Code section 13304 subdivision (a) states:

Any person who has discharged or discharges waste into waters of this state in violation of any waste discharge requirements or other order or prohibition issued by a regional board or the state board, or who has caused or permitted, causes or permits, or threatens to cause or permit any waste to be discharged or deposited where it is, or probably will be, discharged into the waters of the state and causes, or threatens to create, a condition of pollution or nuisance, shall upon order of the regional board clean up the waste or abate the effects of the waste, or, in the case of threatened pollution or nuisance, take other necessary remedial action, including, but not limited to, overseeing cleanup and abatement efforts... Upon failure of any person to comply with the cleanup or abatement order, the Attorney General, at the request of the board, shall petition the superior court for that county for the issuance of an injunction requiring the person to comply with the order. In the suit, the court shall have jurisdiction to grant a prohibitory or mandatory injunction, either preliminary or permanent, as the facts may warrant.

- 23. The Discharger has discharged wastes to waters of the state in violation of Basin Plan waste discharge prohibitions issued by the Lahontan Water Board, and in doing so, has also created a condition of threatened pollution, as discussed in Finding Nos. 22 and 23, above. Such waste discharges and creation of a condition of threatened pollution satisfy the criteria under which the Lahontan Water Board is authorized to issue a Cleanup and Abatement Order to the Discharger, pursuant to Water Code section 13304.
- 24. Cleanup and abatement activities are necessary to mitigate the impacts of the unauthorized waste discharges to surface waters; to eliminate threatened discharges of wastes to surface waters and the groundwater; to restore water quality to natural background; and to restore adversely affected beneficial uses.

The current condition of threatened pollution also poses an immediate and substantial threat to beneficial uses and has the potential to individually or cumulatively cause significant detrimental impacts to human health and the environment. The issuance of a cleanup and abatement order pursuant to Water Code section 13304 is appropriate and consistent with policies of the Lahontan Water Board.

Water Code section 13267 Technical Reports

25. Water Code section 13267, subdivision (a) provides that the Lahontan Water Board may investigate the quality of any water of the state within its region in connection with any action relating to the Basin Plan. Water Code section 13267, subdivision (b), provides that the Lahontan Water Board, in conducting an investigation, may require a discharger to furnish, under penalty of perjury, technical or monitoring program reports that the Lahontan Water Board requires, provided that the burden of the reports bears a reasonable relationship to the need for the reports and the benefits to be obtained. The technical reports required by this Order are necessary to ensure compliance with the cleanup directives set forth in this Order intended to restore water quality and beneficial uses to pre-discharge conditions. The technical reports are further necessary to demonstrate that appropriate methods will be used to cleanup waste discharged to surface waters and to restore compliance with the state's water quality protection laws and regulations (e.g., Water Code, Basin Plan waste discharge prohibitions).

The burden of preparing these reports is reasonably related to these needs and benefits in accordance with Water Code section 13267, subdivision (b). The findings in this Order provide the Discharger with a written explanation regarding the need for remedial action and technical reports, and identifies the evidence supporting the requirements to implement cleanup and abatement activities and submit technical reports. The Discharger named in this Order owns and/or operates the Site from which waste was discharged and on which there exists a continuing threat of future waste discharges, and thus is appropriately named as a party responsible for providing the technical reports.

California Environmental Quality Act

26. Issuance of this Order is an enforcement action taken by a regulatory agency to enforce the regulatory provisions of the laws and regulations administered by the Lahontan Water Board, and is therefore exempt from the provisions of the California Environmental Quality Act (CEQA)(Pub. Resources Code, § 21000 et seq.) in accordance with California Code of Regulations, title 14, section 15321. This action may also be considered exempt because it is an action by a regulatory agency for the protection of natural resources (California Code of Regulations, title 14, section 15307) and an action by a regulatory agency for the protection of the environment (California Code of Regulations, title 14, section 15308).

ORDERS

IT IS HEREBY ORDERED that, pursuant to Water Code sections 13267 and 13304, the Discharger shall cleanup the wastes and abate the impacts to water quality in accordance with the scope and schedule set forth below and provide the following information:

Time Scheduled Requirements

- 1. By **August 31, 2020**, submit a Mitigation Plan (Plan) to the Lahontan Water Board for review. The Plan shall include, at a minimum:
 - a. A schedule and details for the removal of trash, human waste, all potting soil (above and in-ground), hoop houses, irrigation equipment, drip lines, fertilizers, pesticides, and other cultivation-related waste.
 - b. Detail of the methods to be used for Site restoration, including how waste soils will be removed from the drainage channels, and how long-term impacts from Site erosion will be abated (e.g. re-grading, establishing permanent ground cover, etc.). The proposed mitigation shall describe actions necessary to restore beneficial uses designated in the Basin Plan and compensate for current adverse impacts to beneficial uses.
 - i) The Plan shall identify methods that incorporate the use of plant species native to the Site in any revegetation efforts. Disturbed areas shall be reestablished to a uniform vegetative cover equivalent to 70 percent of the predisturbance vegetative conditions. All plantings shall be irrigated until established and able to survive without irrigation. Include a planting plan, plant list, and irrigation plan.
 - ii) California Stormwater Quality Association (www.CASQA.org) best management practices shall be applied to all construction activities on the Site. All applicable permits shall be obtained for any Site restoration work, which may include, but is not limited to, county grading permits, State Water Board NPDES Construction Stormwater Permit, and Clean Water Act section 401/404 permits.
 - c. The Plan shall include an implementation schedule which establishes project milestones with consideration for obtaining applicable permits (local, state, and federal), seasonal restrictions on grading and planting, and meeting the deadlines stipulated in this Order.
 - i) A five-year mitigation monitoring plan that:Identifies how vegetative monitoring data will be used to evaluate successful revegetation and habitat restoration of disturbed areas. The plan shall include the identification of an undisturbed area for use as a background reference site. The reference site shall be representative of the impacted stream channels prior to the discharge.

- ii) Identifies a monitoring schedule, transects, photo points, and/or applies other methods that will be used to evaluate the success of revegetation and riparian habitat restoration efforts against reference site conditions.
- iii) Includes a maintenance schedule and measures to address any erosion and plant stress/mortality following the Plan implementation.
- iv) Identifies interim annual success criteria to achieve a native vegetative cover that is at least 70 percent of pre-disturbance vegetative conditions based upon the background reference site conditions. Adaptive management strategies shall be identified to be implemented when annual interim success criteria are not achieved.
- 2. By **October 16, 2020**, upon concurrence by the Lahontan Water Board Executive Officer, the Discharger shall begin implementing the Plan.
- 3. By **February 28, 2021**, complete all restoration and mitigation measures described in the approved Plan.
- 4. By March 31, 2021, submit a Site Restoration Report to the Lahontan Water Board that demonstrates that the approved Plan has been implemented. This report must also contain a schematic showing as-built conditions, copies of waste manifests and hauling/disposal receipts (as applicable), and provide baseline vegetative monitoring data of all revegetated areas.
- 5. By the **5**th **day of every month** following the issuance of this Order and until the Site Restoration Report is received and approved by the Lahontan Water Board Executive Officer, submit progress updates on Requirements 1 through 4, above, by email to the Lahontan Water Board email address identified in Requirement 16, below. The progress updates shall include the status of any required permits, a description and photographs of work that has been completed since the prior progress update, and the anticipated work schedule for the two months following the progress update.
- 6. By March 1, 2022, submit the results of the Year 1 mitigation monitoring.
- 7. By March 1, 2023, submit the results of the Year 2 mitigation monitoring.
- 8. By **March 1, 2024,** submit the results of the Year 3 mitigation monitoring.
- 9. By **March 1, 2025,** submit the results of the Year 4 mitigation monitoring.
- 10. By March 1, 2026, submit the results of the Year 5 mitigation monitoring.
- 11. At the discretion of Lahontan Water Board Executive Officer, annual mitigation monitoring and reporting may be discontinued if the Discharger demonstrates that the restored channels have been stabilized and native vegetation has been reestablished in disturbed areas at a rate of 70 percent of pre-disturbance conditions and is self-sustaining.

General Requirements and Notices

Duty to Use Qualified Professionals

12. All technical reports required herein that involve planning, investigation, evaluation, design, or other work requiring interpretation and proper application of engineering or geologic sciences, shall be prepared by or under the direction of persons registered to practice in California pursuant to California Business and Professions Code, sections 6735, 7835, and 7835.1. As required by these laws, completed technical reports must bear the signature(s) and seal(s) of the registered professional(s) in a manner such that all work can be clearly attributed to the professional responsible for the work.

Signatory Requirements

13. All technical reports submitted by the Discharger shall include a cover letter signed by the Discharger, or a duly authorized representative, certifying under penalty of law that the signer has examined and is familiar with the report and that to their knowledge, the report is true, complete, and accurate. The Discharger shall also state if they agree with any recommendations/proposals and whether they approve implementation of said proposals. Any person signing a document submitted under this Order shall make the following certification:

"I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my knowledge and on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment."

Notice of Onsite Work

14. The Discharger or their authorized agent(s) shall notify Lahontan Water Board staff at least 48 hours prior to any onsite work, testing, or sampling that pertains to environmental remediation and investigation and is not routine monitoring, maintenance, or inspection, or that has not been fully described in the Plan.

Notice of Change in Ownership or Occupancy

15. The Discharger shall file a written report on any changes in the Site's ownership or occupancy. This report shall be filed with the Lahontan Water Board no later than 30 days prior to a planned change and shall reference the number of this Order.

Submissions

 All monitoring reports, technical reports, or notices required under this Order shall be emailed to <u>Lahontan@waterboards.ca.gov</u> with "Avila CAO No. R6V-2020 (Proposed)" in the subject line.

Other Regulatory Requirements

17. The Discharger shall obtain all applicable local, state, and federal permits necessary to fulfill the requirements of this Order prior to beginning the work. For example, California Fish and Game Code section 1602 requires a person or entity to notify California Department of Fish and Wildlife before changing the bed, channel, or bank of a river, stream, or lake.

Cost Recovery

18. Pursuant to Water Code section 13304, the Lahontan Water Board is entitled to, and may seek reimbursement for, all reasonable costs it actually incurs investigating and abating the effects of the unauthorized discharges of waste and to oversee/supervise the cleanup of such waste, or other remedial action, required by this Order. The Discharger shall enroll in the State Water Board's Cost Recovery Program and shall reimburse the State of California for all reasonable costs actually incurred by the Lahontan Water Board.

Delayed Compliance

19. If for any reason, the Discharger is unable to perform any activity or submit any document in compliance with the schedule set forth herein, or in compliance with any work schedule submitted pursuant to this Order and approved by the Executive Officer, the Discharger may request, in writing, an extension of the time specified. The extension request shall include justification for the delay. Any extension request shall be submitted as soon as a potential delay is recognized and prior to the compliance date. An extension may be granted by revision of this Order or by a letter from the Executive Officer. The Lahontan Water Board acknowledges that local, state, and federal permits may cause a delay beyond the control of the Discharger and will take all the available relevant facts into consideration when considering whether to grant an extension request.

Potential Liability for Failure to Comply

20. If, in the opinion of the Executive Officer, the Discharger fails to comply with the provisions of this Order, the Executive Officer or other delegated officer may refer or recommend that the Lahontan Water Board refer this matter to the Attorney General for judicial enforcement, may issue a complaint for administrative civil liability, or may take other enforcement actions. Failure to comply with this Order may result in the assessment of administrative civil liability of up to \$1,000, \$5,000, or \$10,000 per violation, per day, depending on the violation, pursuant to the Water Code, including sections 13268, 13350, and 13385. The Lahontan Water Board reserves its right to take any enforcement actions authorized by law.

No Limitation of Water Board Authority

21. This Order in no way limits the authority of the Lahontan Water Board to take any enforcement actions authorized by law.

Modifications

22. Any modification to this Order shall be in writing and approved by the Executive Officer.

Requesting Review by the State Water Board

23. Any person aggrieved by this action may petition the State Water Board to review the action in accordance with Water Code section 13320 and California Code of Regulations, title 23, sections 2050 and following. The State Water Board must receive the petition by 5:00 p.m., 30 days after the date of this Order, except that if the thirtieth day following the date of this Order falls on a Saturday, Sunday, or state holiday, the petition must be received by the State Water Board by 5:00 p.m. on the next business day. Copies of the law and regulations applicable to filing petitions may be found on the internet at: http://www.waterboards.ca.gov/public notices/petitions/water quality or will be provided upon request.

This Order is issued under authority delegated to the Executive Officer by the Lahontan Water Board and is effective upon the date of signature.

Ordered by:		Date: _		
•	PATTY Z. KOUYOUMDJIAN			
	EXECUTIVE OFFICER			

- Attachments: 1. October 21, 2019 Notice of Violation with August 16, 2019 Inspection Report, APN 3060-020-043, Los Angeles County
 - 2. August 16, 2019 Soil Sample Results, APN 3060-020-043, Los Angeles County
 - 3. Water Code Section 13267 Fact Sheet

ATTACHMENT 1





Lahontan Regional Water Quality Control Board

October 21, 2019

WDID 6B191908004

Ramiro Villa Avila 471 N California Ave La Puente, CA 91744 CERTIFIED MAIL RETURN RECEIPT REQUESTED 7017 1450 0001 3058 7959

NOTICE OF VIOLATION – VICINITY OF 126TH STREET EAST AND NEARWOOD ROAD, PEARBLOSSOM, LOS ANGELES COUNTY, APN 3060-020-043

This letter provides notice that you have violated the California Water Code (Water Code) and Water Quality Control Plan for the Lahontan Region (Basin Plan) for several activities related to your cannabis cultivation. The violations occurred on Los Angeles County APN 3060-020-043, which is located in the vicinity of the intersection of Nearwood Road and 126th Street East in Pearblossom; Los Angeles County records indicate this property is owned by you. Corrective action needs to be taken; failure to act may subject you to further enforcement which could include administrative civil liability (fines).

Inspection Results

On August 16, 2019 Water Board staff inspected the subject property as part of a Los Angeles County search warrant. Water Board staff observed that two natural ravines had been cut, filled with earthen material, and graded flat to create two cultivation areas. Cannabis cultivation was occurring in a hoop house within the western drainage. Cannabis cultivation was not occurring in the eastern drainage at the time of the inspection, but this hoop house was set-up similarly to the western hoop house with drip irrigation and evidence (hoop houses, live plants, drip lines) that plants had recently been grown in the ground. The cultivation areas were cleared of native vegetation that was otherwise present throughout undisturbed portions of the subject property. Human waste was observed within the two channels immediately upgradient of the earthen fill in each channel. Improperly stored fertilizer, insecticide, growth media, fuel, and a chemical mixing tank were observed within and adjacent to the cultivation areas. A soil sample was collected from the western hoop house; analytical results are still pending. The Key Features Table of the enclosed inspection report identifies areas of concern with Feature Identification Numbers (FID) 30 through 47.

Noted Violations

Water Code Section 13260 requires any individual discharging waste, or proposing to discharge waste, within any region that could affect the quality of waters of the state to file a report of waste discharge (ROWD) containing information that may be required by the appropriate board.

PETER C. PUMPHREY, CHAIR | PATTY Z. KOUYOUMDJIAN, EXECUTIVE OFFICER

The Basin Plan, under the authority of Water Code Section 13243, contains enforceable Waste Discharge Prohibitions that apply to the entire Lahontan Region.

- Prohibition 1 forbids any discharge of waste that causes violation of any narrative or numeric water quality objective contained in the Basin Plan.
- Prohibition 3 forbids the discharge of waste that could affect the quality of waters
 of the state that is not authorized by the State Water Resources Control Board or
 the Lahontan Water Board through waste discharge requirements or other
 appropriate regulatory mechanism.
- Prohibition 4 forbids the discharge of solid waste into surface waters of the Lahontan Region.

The following site conditions and activities observed by staff violate Water Code sections and/or Basin Plan prohibitions:

Violation No. 1: Unauthorized Discharge and Failure to Report a Waste Discharge related to Cannabis Cultivation.

A drip irrigation system was observed to be connected to each hoop house, and a large water tank was located on the upgradient (southern) portion of the site. A smaller chemical mixing tank located on the ridge above the hoop houses was surrounded by chemical and fertilizer containers; the tank appeared to be for mixing chemicals and fertilizers into the irrigation system. The combined application of nutrients, pesticides, and irrigation water (fertigation) to cannabis plants (FIDs: 30, 32, 39, 40, and 42) is considered a waste discharge to land. The Water Board has not received a ROWD for the subject property. Discharging a waste to land within the Lahontan Region without first filing a ROWD with the Water Board violates Water Code Section 13260.

Violation No. 2: Discharge of Sediment to a Watercourse

Two natural watercourses are present and running south to north through each of the cultivation areas. Portions of each channel were cut, filled with earthen material, and graded (FIDs: 30, 31, 35-38, 41-45, and 47). The earthen fill material is considered a solid waste when discharged to a watercourse. The total amount of fill is estimated to be approximately 1.3 million gallons of soil. At a minimum, this discharge exceeds the narrative water quality objective for sediment by adversely affecting the wildlife habitat and groundwater recharge beneficial uses of the watercourse and violates Basin Plan Prohibition 3. This discharge also violates Basin Plan Prohibitions Nos. 1 and 4 for discharge of a solid waste to surface waters of the Lahontan Region.

Required Corrective Actions

1. Submit a written Corrective Action Plan to the Water Board by <u>November 25, 2019</u>. The plan must describe all necessary measures to remove cultivation-related infrastructure and waste, restore disturbed ravine areas, and prevent further discharges to waters of the State.

- Implement the proposed Corrective Action Plan by <u>December 27, 2019</u> following concurrence from Water Board staff.
- By <u>May 1, 2020</u>, or by an alternative date agree upon by Water Board staff, submit documentation showing the completion of the Corrective Action Plan and the restoration of disturbed areas.

Violation of the California Water Code may result in additional enforcement action including, but not limited to, administrative civil liabilities. The Water Board may impose administrative civil liability up to \$10,000 for each day in which the violation occurs and an additional \$10 per gallon of discharge in excess of 1,000 gallons pursuant to the California Water Code Section 13385. Alternatively, the Water Board may impose administrative civil liability up to \$5,000 for each day in which the violation occurs or \$10 per gallon of discharge pursuant to California Water Code section 13350. The Water Board reserves the right to take any further enforcement action authorized by law. The landowner is the ultimate responsible party for any water quality degradation that occurs on or emanates from its property.

please contact Alex Spencer, Water Resource Control Engineer, at (530) 542-5488 (alex.spencer@waterboards.ca.gov), Emily Cushman, Engineering Geologist, at (530) 542-5598 (emily.cushman@waterboards.ca.gov), or me at (530) 542-5434 (eric.taxer@waterboards.ca.gov) if you have any questions concerning this matter.

Eric J. Taxer, P.E.

Senior Water Resource Control Engineer Eastern California Regional Cannabis Unit

Enclosure: Inspection report for parcel 3060-020-043, Los Angeles County

cc: Andrew Tauriainen, Attorney IV, Office of Chief Counsel, State Water Board Kevin Porzio, Sr. WRCE, Division of Water Quality, State Water Board Dylan Seidner, Sr. WRCE, Office of Enforcement, State Water Board Tabatha Chavez, Supervising Special Investigator, Calcannabis, CDFA Noel Richards, Lieutenant, Cannabis Enforcement Program, CDFW Jeff Brandt, Cannabis Enforcement Program, CDFW CDFW Region 6 Office, Cannabis Enforcement Program, CDFW Arlene Anderson, Deputy District Attorney, Los Angeles County, Robert Hawkins, Detective, Los Angeles County Sheriff's Department Alex Spencer, Lahontan Water Board Emily Cushman, Lahontan Water Board



Inspection Brief

Eastern California Cannabis Unit

2501 Lake Tahoe Blvd, South Lake Tahoe, CA 96150 | (530) 542-5400

Site Information

Site information				
Landowner (Source LandVision 8/19/2019)				
Name	Avila, Ramiro Villa	Address	471 N California Ave La Puente, CA 91744	
Site/Facility				
Name	D2 Site1 - 3060-020-043	Address	VIC 126 STE Nearwood Road Pearblossom, CA 93553	
Site County	Los Angeles	Site APN	3060-020-043	
Permitting Status	General Order (Order WQ 2019-0 permitted in unincorporated portion	001-DWQ) a		
WDID	Unpermitted		_	
Site Location				
3 3060020	30600		306002003 in, iPC Powered by Esti	
Latitude	34.4363911087094	Longitude	-117.902011191191	

Inspection Information

Inspection Date	Aug 16, 2019	Start	0916	End	1140
Warrant/Consent	Warrant	Otart	100.0		
Personnel					
Inspection Conducted By	Alex Spencer, WRCE, Easter Regional Water Quality Con Emily Cushman, EG, Easter Water Quality Control Board Eric Taxer, SWRCE, Easter Water Quality Control Board Casey Yearout, WRCE, Offi	trol Boa n Califo l n Califo l	rd rnia Cannabis Uı rnia Cannabis Ur	nit, Lah	nontan Regional ontan Regional
Accompanied By	Arlene Anderson, Los Angeles County District Attorney Los Angeles County Sheriff Office, Palmdale Station (multiple personnel, lead Detective Rob Hawkins) California Department of Fish and Wildlife (multiple personnel) United States Drug Enforcement Administration (multiple personnel)				

Purpose

Evaluate unpermitted cannabis cultivation site for potential water quality violations.

Background

State and Regional Water Resources Control Board (Water Board) staff participated in an inspection at the location identified above (Site) to document actual and/or threatened water quality impacts for potential California Water Code (Water Code) violations. The inspection was conducted under search warrant as part of coordinated efforts led by the Los Angeles County Sheriff's Office (Sheriff), California Department of Fish and Wildlife (CDFW), and other agencies as noted above.

Inspection Observations

Sheriff's Department personnel entered and cleared the Site of any suspects prior to Water Board staff arrival. Water Board staff entered the Site at 0916 hours and observed two roughly parallel drainages on the Site, each had been graded and contained a large hoop house. The upgradient portion of each drainage began on the southern portion of the Site and dipped north. Earth work had been done in each drainage to create a wide, flat space along the length of the drainages where two relatively similar sized sets of hoop houses had been constructed; the western hoop house contained live cannabis plants growing directly in the ground. The eastern hoop house was not being cultivated at the time of the inspection. A motorhome was present at the Site, located on a dirt area between the two drainages. Water Board staff identified 17 key features; these are identified by Feature Identification (FID) numbers in this report. Feature Identification numbers correspond to our online collection system dataset.

We observed a drip irrigation system which connected to each hoop house; a large water tank was located on the upgradient (southern) portion of the Site. A smaller chemical mixing tank located on the ridge above the hoop houses was surrounded by chemical and fertilizer containers; the tank appeared to be for mixing chemicals and fertilizers into the irrigation system (Photos 6, 20, 21 & FID: 39 and 40). We were notified by Sheriff personnel that an irrigation line was located downgradient of the eastern cultivation area leaving the Site (FID: 46); this irrigation water was being used to grow more cannabis plants in two distinct areas within the drainage below the eastern cultivation area on APN 3060-020-058. Water Board staff did not have warrant access to APN

3060-020-058, but Detective Hawkins told us that additional cannabis plants had been planted in the drainage area.

Emily Cushman used a Nikon Forestry Pro IEC60825 to measure the dimensions of each hoop house. The western hoop house measured approximately 75-feet wide and 130-feet long, and the eastern hoop house measured approximately 75-feet wide by 145-feet long. Alex Spencer used Garmin GLO 190-01492-90-0C in conjunction with a Microsoft SurfacePro model 1796 to collect the FIDs.

Emily Cushman collected soil samples at FID: 33 for laboratory analysis of pesticides by EPA Method 8081B and 8141 (sample numbers: 19RB6CANN006 and 19RB6CANN007). Laboratory results have not been received at the time of this report.

The upgradient portions of each drainage were used as bathrooms (FID: 34 and 41). Disturbances in the upper portion of the western drainage ("Length 1 west") consisted mostly of fill to create an access road. In the eastern drainage disturbances to the upper portion of the drainage did not involve road building but were still notable ("Length 1 east").

Soil disturbances associated with grading for the western and eastern hoop houses were significant ("Length 2 west" and "Length 2 east") and involved cutting into the banks of the drainages and filling the natural channels to create approximately 77-foot wide and 80-foot wide flat areas for cultivation in the west and east channels, respectively. We estimate that the ravine walls outside the central portion of the channel were cut an average of 7 feet above the final grade. In the each of the drainages stockpiles of soil spoils were located above (FID: 31 and 44) and below each hoop house (FID: 38 and 42) that were not secured to prevent runoff or run-on during a storm event. Cultivation related waste was observed in each drainage (FID: 32 and 43) and on the ridge between the hoop houses (FID: 39) including partially full and empty containers of fertilizer and other chemicals; all containers were stored uncovered and without secondary containment, in a manner not protective of wildlife or the environment.

The inspection was completed at 1140 hours.



Analysis

Key Features				
FID: 30 - Active cannabis cultivation	Associated Photo Numbers: 1, 2, 3, 4, 5, 7, 10			
area (west)				
Description: Western hoop houses with cannabis plants growing in the ground. A drip irrigation system was being used. The cultivation area was located entirely within the graded ravine. The hoop house measured approximately 130-feet long by 75-feet wide. The base of the hoop house				
	be relatively flat. We estimated that each drainage had			
been cut to an average depth of approxin	,			
Water Quality Violation: Yes	· ·			
Applicable Water Code: 13260 - Cultivator is not enrolled in the Water Board's Cannabis				
Cultivation General Order WQ 2019-0001	I-DWQ			
Latitude: 34.4367817833333 Longitude: -117.90206535				
FID: 31 - Excavated spoils pile	Associated Photo Numbers: 8, 14			
Description: This soil spoils pile measured 0.0181 acres, averaged approximately 5 feet in height, and was located on the eastern side of the channel from this point extending upgradient (south) to FID: 36 (Photo 14).				
Water Quality Violation: Under Assessment				
Applicable Water Code: Under Assessment				
Latitude: 34.4367264166667	Longitude: -117.902126433333			

FID: 32 - Cultivation related waste	Associated Photo Numbers: 9		
Description: Trash pile of cultivation related waste: fertilizer containers, potting soil, and drink			
containers. This waste was stored without containment, in a manner not protective of wildlife or the			
environment.			
Water Quality Violation: Under Assessme	nt		
Applicable Water Code: Under Assessment			
Latitude: 34.43673565 Longitude: -117.902066633333			
FID: 33 - Soil sampling location	Associated Photo Numbers: none		
Description: Soil sampling location. Emily Cushman collected two soil samples from the base of a			
	ouse. The samples contained blue granular material like		
	ples were submitted for laboratory analysis of pesticides		
using US EPA Methods 8081B and 8141.			
Water Quality Violation: Under Assessme			
Applicable Water Code: Under Assessme	ent		
Latitude: 34.4368014333333	Longitude: -117.902032033333		
FID: 34 - Outdoor bathroom area	Associated Photo Numbers: 11, 12		
(west)			
Description: Toilet paper and solid humar	Description: Toilet paper and solid human waste present within the natural drainage upgradient of		
this point in the western drainage.			
Water Quality Violation: Under Assessme	nt		
Applicable Water Code: Under Assessment			
Latitude: 34.4362646 Longitude: -117.902338183333			
FID: 35 - Start of graded/filled Associated Photo Numbers: 12, 13			
channel - Length 1 west			
Description: The natural bed of the channel at this point was measured as approximately 3-ft wide			
(Photo 12). This point is the most upgradient portion of the grading in the western channel and			
extends 130 feet downgradient to FID: 36. The bed of the channel along "Length 1 west" was filled			
and graded to a width of approximately 15 feet to create a road to access the western hoop house			
(Photo 13).			
Water Quality Violation: Under Assessment			
Applicable Water Code: Under Assessment			
Latitude: 34.4363117333333	Longitude: -117.90234675		
FID: 36 - End of graded/filled channel	Associated Photo Numbers: 14		
- Length 1 west			
Description: The downgradient end of "Length 1 west" (FID: 35 to 36). See more information in			
FID: 35 description. The spoils pile (FID: 31) begins at this point and continues north.			
Water Quality Violation: Under Assessment			
Applicable Water Code: Under Assessment			
Latitude: 34.43666855	Longitude: -117.902186933333		

FID: 37 - Start of cut/filled channel -	Associated Photo Numbers: 13, 14			
Length 2 west	# C # (FID 07 + 00) T			
Description: The most upgradient point "Length 2 west" (FID: 37 to 38). The channel along "Length				
2 west" has been cut and filled with soil to create a flat space to construct a hoop house to cultivate				
· · · · · · · · · · · · · · · · · · ·	n each side of the central portion of the channel were cut			
and filled to width of approximately 52 fee				
Water Quality Violation: Under Assessme				
Applicable Water Code: Under Assessme				
Latitude: 34.4366406333333	Longitude: -117.902197883333			
FID: 38 - End of cut/filled channel -	Associated Photo Numbers: 15, 16, 17			
Length 2 west				
	disturbance in the western channel and the end of "Length			
	pottom of the western hoop house and 215 feet south			
	s on each side of the central portion of the channel were			
· ·	77-feet wide at this point. We estimated that the walls of			
	epth of approximately 7-feet above final grade to fill the			
central portion of the channel.				
Water Quality Violation: Under Assessme				
Applicable Water Code: Under Assessme				
Latitude: 34.437185	Longitude: -117.90213445			
FID: 39 - Stored fertilizer and	Associated Photo Numbers: 20, 21			
chemicals near mixing tank				
	nd a tank (FID: 40) which did not have secondary			
	system. These chemicals were stored in a manner not			
1 .	This tank appears to be where chemicals and fertilizer			
were added into the irrigation system.				
Water Quality Violation: Under Assessme				
Applicable Water Code: Under Assessme				
Latitude: 34.4367228333333				
FID: 40 – Fertilizer and chemical	Associated Photo Numbers: 6,20,21			
mixing tank				
Description: This tank is part of the irrigation system and appears to be where chemicals and				
fertilizer were mixed into the irrigation system. Chemicals and fertilizers were stored adjacent to				
this tank (FID: 39).				
Water Quality Violation: Under Assessment				
Applicable Water Code: Under Assessment				
Latitude: 34.4367175 Longitude: -117.901914416667				
FID: 41 - Start of graded/filled	Associated Photo Numbers: 22, 23			
channel - Length 1 east				
Description: FID: 41 is the most upgradient point of disturbance in the eastern channel and the				
start of "Length 1 east" which is 55-feet long (FID: 41 to 41). The natural channel above this point				
was measured as 6-feet wide and 6-inches deep. The riparian zone/banks of the channel along				
"Length 1 east" had been disturbed but not cut. The area south (upgradient) of this point was being				
used as an outdoor bathroom; toilet paper and solid human waste were present (Photo 22).				
Water Quality Violation: Under Assessment				
Applicable Water Code: Under Assessment				

Longitude: -117.901742016667

Latitude: 34.4364195

FID: 42 - End of graded/filled channel	Associated Photo Numbers: 24			
- Length 1 east				
Description: FID: 42 is the most downgradient point of "Length 1 east" (FID: 41 to 42). See FID: 41				
description for more details.				
Water Quality Violation: Under Assessment				
Applicable Water Code: Under Assessme	ent			
Latitude: 34.4365667833333	Longitude: -117.901707766667			
FID: 43 - Start of cut/filled channel -	Associated Photo Numbers: 24			
Length 2 east				
Description: This point is the most upgrad	dient portion of excavation in the eastern channel. The			
•	asured as approximately 6-feet wide. "Length 2 east" is			
	4. At this point the ravine walls had been cut and filled to			
, , , , , , , , , , , , , , , , , , , ,	at FID: 47 the ravine walls had been cut and filled to a			
	tral portion of the channel had been cut and filled to create			
	tion related waste was dumped without containment.			
Water Quality Violation: Under Assessme	ent			
Applicable Water Code: Under Assessme	ent			
Latitude: 34.4365664	Longitude: -117.901708566667			
FID: 44 - End of cut/filled channel -	Associated Photo Numbers: 25			
Length 2 east with spoils pile				
	dient point of "Length 2 east" and the bottom of the			
	was 80-ft wide at this point as measured across the			
drainage.	·			
Water Quality Violation: Under Assessme	ent			
Applicable Water Code: Under Assessme	ent			
Latitude: 34.4371495833333	Longitude: -117.901576583333			
FID: 45 - Excavated spoils pile	Associated Photo Numbers: 24			
upgradient of eastern cultivation				
area				
Description: Soil spoils pile measured as 39-feet long, 5-feet wide, average 4-feet in height. The				
spoil pile was in the eastern drainage, south (upgradient) of the hoop house. The pile length was				
measured perpendicular to the drainage.				
Water Quality Violation: Under Assessment				
Applicable Water Code: Under Assessment				
Latitude: 34.4366174833333 Longitude: -117.901695966667				
FID: 46 - Irrigation line to off-Site	Associated Photo Numbers: none			
cultivation areas				
Description: An irrigation line was discovered by Sheriff's Department staff leaving the eastern				
cultivation area north (downgradient) to additional, off-Site cultivation areas on the adjacent parcel				
to the north.				
Water Quality Violation: Under Assessment				
Applicable Water Code: Under Assessment				
Latitude: 34.437402	Longitude: -117.901498			

FID: 47 – Eastern hoop house

Associated Photo Numbers: 18, 19, 25

Description: FID: 47 is the most upgradient extent of eastern hoop house. While no active cultivation was occurring in this hoop house at the time of the inspection, a drip irrigation system was in place and plants had been cultivated in the ground within the hoop house. The ravine walls at this location had been cut and filled to create an 80-foot wide level cultivation area. The hoop house dimension were approximately 145-feet long and 75-ft wide.

Water Quality Violation: Under Assessment Applicable Water Code: Under Assessment

Latitude: 34.43672165 Longitude: -117.901706883333

Photo Log



Photo Number: Photo 1

08/16/2019 9:12 AM

Latitude:

34.4365816666667

Longitude: -117.901925

Photographer: Eric Taxer Direction: Northwest

Camera: NIKON CORPORATION COOLPIX W300

Description: (Filename: DSCN0300_96831.JPG)

Western hoop

house/cultivation area

(FID: 30)





08/16/2019 9:13 AM

Latitude:

34.4366733333333

Longitude: -117.902

Photographer: Eric Taxer Direction: West-northwest

Camera: NIKON **CORPORATION** COOLPIX W300

Description: (Filename: DSCN0304_96831.JPG)

Western hoop

house/cultivation area

(FID: 30)



Photo Number: Photo 3

08/16/2019 9:17 AM

Latitude:

34.4367616666667

Longitude:

-117.902096666667

Photographer: Eric Taxer

Direction: North Camera: NIKON **CORPORATION** COOLPIX W300

Description: (Filename: DSCN0312_96831.JPG) Interior of western hoop house/cultivation area

(FID: 30)



08/16/2019 9:17 AM

Latitude: 34.43676

Longitude:

-117.902091666667

Photographer: Eric Taxer Direction: Northeast

Camera: NIKON CORPORATION COOLPIX W300

Description: (Filename: DSCN0313_96831.JPG) Interior of western hoop house/cultivation area

(FID: 30)



Photo Number: Photo 5

08/16/2019 9:16 AM

Latitude: 34.43675

Longitude: -117.90212

Photographer: Eric Taxer Direction East-northeast

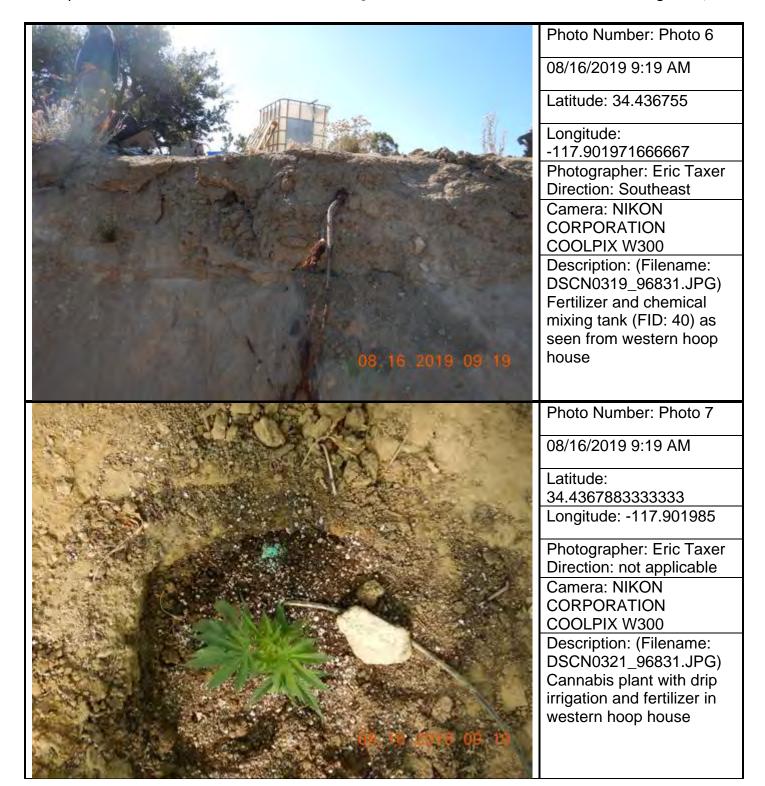
Camera: NIKON CORPORATION COOLPIX W300

Description: (Filename: DSCN0308_96831.JPG)

Western hoop

house/cultivation area

(FID: 30)





08/16/2019 9:20 AM

Latitude:

34.4367666666667

Longitude: -117.902055

Photographer: Eric Taxer

Direction: South Camera: NIKON **CORPORATION** COOLPIX W300

Description: (Filename: DSCN0322_96831.JPG) Spoils pile upgradient of western cultivation area

(FID: 31)



Photo Number: Photo 9

08/16/2019 9:20 AM

Latitude:

34.4367183333333

Longitude:

-117.902061666667

Photographer: Eric Taxer Direction: not applicable

Camera: NIKON **CORPORATION** COOLPIX W300

Description: (Filename: DSCN0323_96831.JPG) Cultivation related waste in western channel

(FID: 32)



08/16/2019 9:22 AM

Latitude:

34.4368283333333

Longitude:

-117.902048333333

Photographer: Eric Taxer Direction: not applicable

Camera: NIKON CORPORATION COOLPIX W300

Description: (Filename: DSCN0325_96831.JPG) Improperly stored fertilizer in western hoop house



Photo Number: Photo 11

08/16/2019 9:37 AM

Latitude: 34.43623

Longitude:

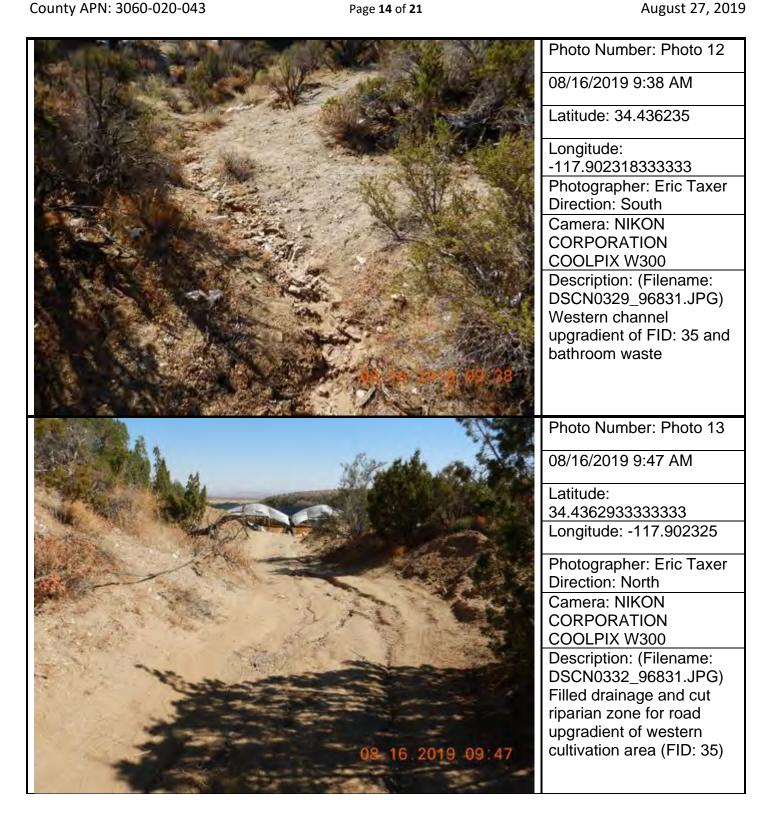
-117.902313333333

Photographer: Eric Taxer

Direction: South

Camera: NIKON CORPORATION COOLPIX W300

Description: (Filename DSCN0328_96831.JPG) Outdoor bathroom area and waste in western drainage (FID: 34)





08/16/2019 9:48 AM

Latitude:

34.4366616666667

Longitude:

-117.902181666667

Photographer: Eric Taxer

Direction: North

Camera: NIKON **CORPORATION** COOLPIX W300

Description: (Filename: DSCN0334_96831.JPG) End of access road and transition to cultivation area in western drainage. The upgradient portion of the spoils pile (FID: 31) is pictured in the right of the

photo

Photo Number: Photo 15

08/16/2019 9:58 AM

Latitude: 34.437185

Longitude:

-117.902086666667

Photographer: Eric Taxer Direction: North-northwest

Camera: NIKON **CORPORATION** COOLPIX W300

Description: (Filename: DSCN0336_96831.JPG) Spoils pile downgradient of western cultivation area

(FID: 38)





08/16/2019 9:58 AM

Latitude:

34.4371816666667

Longitude: -117.902075

Photographer: Eric Taxer

Direction: North Camera: NIKON **CORPORATION** COOLPIX W300

Description: (Filename: DSCN0337_96831.JPG) Spoils pile downgradient of western cultivation area

(FID: 38)



Photo Number: Photo 17

08/16/2019 9:58 AM

Latitude:

34.4371883333333

Longitude: -117.902065

Photographer: Eric Taxer Direction: North-northeast

Camera: NIKON **CORPORATION** COOLPIX W300

Description: (Filename: DSCN0338 96831.JPG) Spoils pile downgradient of western cultivation area

(FID: 38)



08/16/2019 10:03 AM

Latitude:

34.4365766666667

Longitude: -117.90187

Photographer: Eric Taxer

Direction: Northeast
Camera: NIKON

CORPORATION COOLPIX W300

Description: (Filename: DSCN0341_96831.JPG) Eastern cultivation area

(FID: 47)



Photo Number: Photo 19

08/16/2019 10:15 AM

Latitude:

34.4371883333333

Longitude:

-117.901536666667

Photographer: Eric Taxer Direction: Northeast

Camera: NIKON

CORPORATION COOLPIX W300

Description: (Filename: DSCN0349_96831.JPG)
Eastern cultivation area

(FID: 47)



Photo Number: Photo 20

08/16/2019 10:04 AM

Latitude: 34.43674

Longitude: -117.90171

Photographer: Eric Taxer Direction: Northwest

Camera: NIKON CORPORATION COOLPIX W300

Description: (Filename: DSCN0342_96831.JPG)
Chemical mixing tank and cultivation related waste

(FID: 39 and 40)

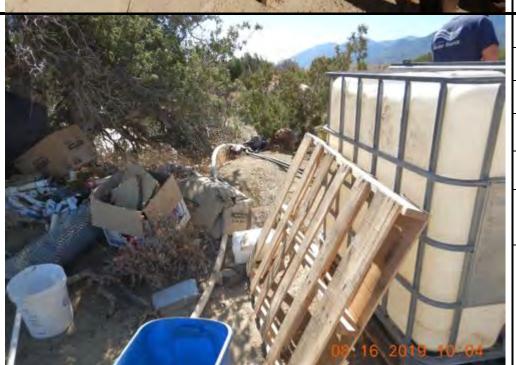


Photo Number: Photo 21

08/16/2019 10:04 AM

Latitude: 34.436715

Longitude:

-117.901921666667

Photographer: Eric Taxer

Direction: North

Camera: NIKON CORPORATION COOLPIX W300

Description: (Filename: DSCN0343_96831.JPG) Chemical mixing tank and cultivation related waste

(FID: 39 and 40)



Photo Number: Photo 22

08/16/2019 10:06 AM

Latitude:

34.4364266666667

Longitude: -117.901745

Photographer: Eric Taxer

Direction: South
Camera: NIKON
CORPORATION
COOLPIX W300

Description: (Filename: DSCN0346_96831.JPG)
Outdoor bathroom area with paper and solid human waste above the eastern hoop house

(FID: 41)

Photo Number: Photo 23

08/16/2019 10:09 AM

Latitude:

34.4364416666667

Longitude:

-117.901721666667

Photographer: Eric Taxer Direction: Southeast

Camera: NIKON CORPORATION COOLPIX W300

Description: (Filename: DSCN0347_96831.JPG)

Start of filled and

disturbed eastern channel, "Length 1 east" (FID: 41)





Photo Number: Photo 24

August 27, 2019

08/16/2019 10:10 AM

Latitude:

34.4366033333333

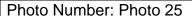
Longitude:

-117.901621666667

Photographer: Eric Taxer Direction: West-northwest

Camera: NIKON CORPORATION COOLPIX W300

Description: (Filename: DSCN0348_96831.JPG)
Spoil and trash pile upgradient of eastern cultivation area. End of "Length 1 east" (FID: 42 and 43), beginning of "Length 2 east"



08/16/2019 10:18 AM

Latitude:

34.4371083333333

Longitude:

-117.901771666667

Photographer: Eric Taxer Direction: East-northeast

Camera: NIKON CORPORATION COOLPIX W300

Description: (Filename: DSCN0352_96831.JPG)
Spoils pile downgradient of eastern cultivation area

(FID: 44)



Preparation and Review

Prepared by:	50-11	
	Chuly lushnay	August 27, 2019
	Emily Cushman Engineering Geologist	Date
	MA	

Alex Spencer Date
Water Resource Control Engineer

Reviewed by:

Eric J. Taxer Date

Senior Water Resource Control Engineer



October 09, 2019

Analytical Report

Client: Water Board

1001 I Street

Sacramento, CA 95814

Attn: Emily Cushman

Work Order #: 1908101

Project: RWB6_General_2019

Project #: [none]

P.O. Number:

Project Received: August 20, 2019 9:58
Project Reported: October 9, 2019 14:17

Sincerely,

Timea Majoros, Ph.D.

Laboratory Director / President

Timea Majoros





WORK ORDER: 1908101 COC Number:

1001 I Street

Sacramento, CA 95814

Water Board Project: RWB6_General_2019

PO Number:

Project Manager: Emily Cushman

Project #:[none]

Sample Summary

Lab ID	Sample	Matrix	Date Sampled	Date Received
1908101-01	19RB6CANN001	Sediment	August 15, 2019 11:05	August 20, 2019 9:58
1908101-02	19RB6CANN002	Sediment	August 15, 2019 11:05	August 20, 2019 9:58
1908101-03	19RB6CANN003	Sediment	August 15, 2019 11:10	August 20, 2019 9:58
1908101-04	19RB6CANN004	Sediment	August 15, 2019 11:10	August 20, 2019 9:58
1908101-05	19RB6CANN006	Sediment	August 16, 2019 9:25	August 20, 2019 9:58
1908101-06	19RB6CANN007	Sediment	August 16, 2019 9:26	August 20, 2019 9:58
1908101-07	19RB6CANN008	Sediment	August 16, 2019 12:25	August 20, 2019 9:58
1908101-08	19RB6CANN009	Sediment	August 16, 2019 12:26	August 20, 2019 9:58





WORK ORDER: 1908101 COC Number:

Project: RWB6_General_2019

PO Number:

Project Manager: Emily Cushman

Project #:[none]

Sample Results

(Continued)

Sample Date: August 16, 2019 9:25

Sample: 19RB6CANN006

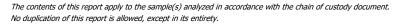
Water Board

1001 I Street

Sacramento, CA 95814

1908101-05 (Sediment) Sample Type: Prep Date: August 30, 2019 15:54

Analyte	Reporting Qual	Result	Unit	Dilution	Date	NA - 12 - 1	Batch/	
	Limit	Result	Unit	Factor	Analyzed	Method	Analyst	
Organochlorine Pesticides by EPA 808	1							
Alpha-BHC	0.00002	ND	ug/kg dry	1	9/19/19	EPA 8081	19I0211/NG	
Hexachlorobenzene	0.00002	10.6	ug/kg dry	1	9/19/19	EPA 8081	19I0211/NG	
Lindane	0.00002	ND	ug/kg dry	1	9/19/19	EPA 8081	19I0211/NG	
Beta-BHC	0.00002	ND	ug/kg dry	1	9/19/19	EPA 8081	19I0211/NG	
Delta-BHC	0.00002	ND	ug/kg dry	1	9/19/19	EPA 8081	19I0211/NG	
Heptachlor	0.00002	ND	ug/kg dry	1	9/19/19	EPA 8081	19I0211/NG	
Aldrin	0.00002	ND	ug/kg dry	1	9/19/19	EPA 8081	19I0211/NG	
Heptachlor epoxide	0.00002	ND	ug/kg dry	1	9/19/19	EPA 8081	19I0211/NG	
2,4 DDE	0.00002	ND	ug/kg dry	1	9/19/19	EPA 8081	19I0211/NG	
Gamma chlordane	0.00002	ND	ug/kg dry	1	9/19/19	EPA 8081	19I0211/NG	
Alpha chlordane	0.00002	ND	ug/kg dry	1	9/19/19	EPA 8081	19I0211/NG	
Endosulfan I	0.00002	ND	ug/kg dry	1	9/19/19	EPA 8081	19I0211/NG	
4,4' DDE	0.00002	ND	ug/kg dry	1	9/19/19	EPA 8081	19I0211/NG	
2,4'-DDD	0.00002	ND	ug/kg dry	1	9/19/19	EPA 8081	19I0211/NG	
Dieldrin	0.00002	ND	ug/kg dry	1	9/19/19	EPA 8081	19I0211/NG	
Perthane	0.00002	ND	ug/kg dry	1	9/19/19	EPA 8081	19I0211/NG	
Endrin	0.00002	ND	ug/kg dry	1	9/19/19	EPA 8081	19I0211/NG	
2,4 DDT	0.00002	ND	ug/kg dry	1	9/19/19	EPA 8081	19I0211/NG	
cis-Nonachlor	0.00002	ND	ug/kg dry	1	9/19/19	EPA 8081	19I0211/NG	
4,4' DDD	0.00002	ND	ug/kg dry	1	9/19/19	EPA 8081	19I0211/NG	
Endosulfan II	0.00002	ND	ug/kg dry	1	9/19/19	EPA 8081	19I0211/NG	
Endrin aldehyde	0.00002	ND	ug/kg dry	1	9/19/19	EPA 8081	19I0211/NG	
4,4' DDT	0.00002	ND	ug/kg dry	1	9/19/19	EPA 8081	19I0211/NG	
Endosulfan sulfate	0.00002	ND	ug/kg dry	1	9/19/19	EPA 8081	19I0211/NG	
Methoxychlor	0.00002	ND	ug/kg dry	1	9/19/19	EPA 8081	19I0211/NG	
Endrin Ketone	0.00002	ND	ug/kg dry	1	9/19/19	EPA 8081	19I0211/NG	
Mirex	0.00002	ND	ug/kg dry	1	9/19/19	EPA 8081	19I0211/NG	
Dicofol	0.00002	24.7	ug/kg dry	1	9/19/19	EPA 8081	19I0211/NG	





WORK ORDER: 1908101 COC Number:

Project: RWB6_General_2019

PO Number:

Project Manager: Emily Cushman

Project #:[none]

Sample Results

(Continued)

Sample Date: August 16, 2019 9:25

Sample: 19RB6CANN006 (Continued)

Water Board

1001 I Street

Sacramento, CA 95814

1908101-05 (Sediment) Sample Type: Prep Date: August 30, 2019 15:54

Analyte Reporting Qual Result Unit Factor Analyzed Method Analyst

Organochlorine Pesticides by EPA 8081 (Continued)

 Surrogate: 2-Fluorobiphenyl
 15-150
 81.9%
 9/19/19
 EPA 8081
 19I0211/NG





WORK ORDER: 1908101 COC Number:

Water Board Project: RWB6_General_2019

PO Number:

Project Manager: Emily Cushman

Project #:[none]

Sample Results

(Continued)

Sample Date: August 16, 2019 9:26

Sample: 19RB6CANN007

1001 I Street

Sacramento, CA 95814

1908101-06 (Sediment) Sample Type: Prep Date: September 5, 2019 15:2

Analyte	Reporting Limit	Qual	Result	Unit	Dilution Factor	Date Analyzed	Method	Batch/ Analyst
% Solid % Solids	0.10		50	% DW	1	10/9/19	By Calculation	19I0073/TM



WORK ORDER: 1908101 COC Number:

Water Board Project: RWB6_General_2019

PO Number:

Project Manager: Emily Cushman

Project #:[none]

Sample Results

(Continued)

Sample Date: August 16, 2019 9:26

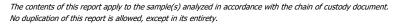
Sample: 19RB6CANN007 (Continued)

1001 I Street

Sacramento, CA 95814

1908101-06 (Sediment) Sample Type: Prep Date: August 30, 2019 13:35

1300101 00 (Scannenc)				1 Tep Dates				
Analyte	Reporting Limit	Qual	Result	Unit	Dilution Factor	Date Analyzed	Method	Batch/ Analyst
Organophosphorus Pesticides								
Atrazine			0.00	ug/kg dw dry	1	9/19/19	EPA 625	19I0228/NG
Dichlorvos (DDVS)			1.55	ug/kg dw dry	1	9/19/19	EPA 625	19I0228/NG
Mevinphos (Phosdrin)			0.00	ug/kg dw dry	1	9/19/19	EPA 625	19I0228/NG
Demeton-O			1.33	ug/kg dw dry	1	9/19/19	EPA 625	19I0228/NG
Ethoprop			0.00	ug/kg dw dry	1	9/19/19	EPA 625	19I0228/NG
Naled (Dibrom)			0.00	ug/kg dw dry	1	9/19/19	EPA 625	19I0228/NG
Phorate			0.00	ug/kg dw dry	1	9/19/19	EPA 625	19I0228/NG
Demeton-S			4.64	ug/kg dw dry	1	9/19/19	EPA 625	19I0228/NG
Dimethoate			0.00	ug/kg dw dry	1	9/19/19	EPA 625	19I0228/NG
Diazinon			10.2	ug/kg dw dry	1	9/19/19	EPA 625	19I0228/NG
Disulfoton			9.06	ug/kg dw dry	1	9/19/19	EPA 625	19I0228/NG
Methyl Parathion			0.00	ug/kg dw dry	1	9/19/19	EPA 625	19I0228/NG
Ronnel (Fenchlorphos)			0.00	ug/kg dw dry	1	9/19/19	EPA 625	19I0228/NG
Malathion			0.00	ug/kg dw dry	1	9/19/19	EPA 625	19I0228/NG
Chlorpyrifos			0.00	ug/kg dw dry	1	9/19/19	EPA 625	19I0228/NG
Fenthion			0.00	ug/kg dw dry	1	9/19/19	EPA 625	19I0228/NG
Ethyl Parathion/Prowl			0.00	ug/kg dw dry	1	9/19/19	EPA 625	19I0228/NG
Merphos			0.00	ug/kg dw dry	1	9/19/19	EPA 625	19I0228/NG





WORK ORDER: 1908101 COC Number:

Project: RWB6_General_2019

PO Number:

Project Manager: Emily Cushman

Project #:[none]

Sample Results

(Continued)

Sample Date: August 16, 2019 9:26

Sample: 19RB6CANN007 (Continued)

Water Board

1001 I Street

Sacramento, CA 95814

1908101-06 (Sediment) Sample Type: Prep Date: August 30, 2019 13:35

Analyte	Reporting Qua	l Result	Unit	Dilution Factor	Date Analyzed	Method	Batch/ Analyst
Organophosphorus Pesticides (/		
Methidathion	•	0.00	ug/kg dw dry	1	9/19/19	EPA 625	19I0228/NG
Trichloronate		0.00	ug/kg dw dry	1	9/19/19	EPA 625	19I0228/NG
Tetrachlorvinphos		0.00	ug/kg dw dry	1	9/19/19	EPA 625	19I0228/NG
Tokuthion (Prothiofos)		0.00	ug/kg dw dry	1	9/19/19	EPA 625	19I0228/NG
Chlorzoxazone		0.00	ug/kg dw dry	1	9/19/19	EPA 625	19I0228/NG
Fensulfothion		0.00	ug/kg dw dry	1	9/19/19	EPA 625	19I0228/NG
Ethion		0.00	ug/kg dw dry	1	9/19/19	EPA 625	19I0228/NG
Bolstar (Sulprofos)		0.00	ug/kg dw dry	1	9/19/19	EPA 625	19I0228/NG
Phosmet		0.00	ug/kg dw dry	1	9/19/19	EPA 625	19I0228/NG
Azinphos methyl (Guthion)		0.00	ug/kg dw dry	1	9/19/19	EPA 625	19I0228/NG
Coumaphos (Co-Ral)		0.00	ug/kg dw dry	1	9/19/19	EPA 625	19I0228/NG
Surrogate: Nitrobenzene-d5	15-150	31.4%			9/19/19	EPA 625	19I0228/NG
Surrogate: 2-Fluorobiphenyl	15-150	81.9%			9/19/19	EPA 625	19I0228/NG
Surrogate: p-Terphenyl-d14	15-150	214%			9/19/19	EPA 625	19I0228/NG



WORK ORDER: 1908101 COC Number:

1001 I Street

Sacramento, CA 95814

Water Board Project: RWB6_General_2019

PO Number:

Project Manager: Emily Cushman

Project #:[none]

Quality Control

% Solid Prepared: Sep-05-19 Analyzed: Oct-09-19

Analyte	Source Result	Result	Qual	Reporting Limit	Unit	Spike Level	% REC	%REC Limits	RPD	RPD Limit
Batch: 19I0073									Analys	t: TMM
Blank (19I0073-BLK1)										
% Solids		100		0.10	% DW					
LCS (19I0073-BS1)										
% Solids		98		0.10	% DW			80-120		
LCS Dup (19I0073-BSD1)										
% Solids		87		0.10	% DW			80-120	11.7	20
Duplicate (19I0073-DUP1)		Sourc	e: 1908 :	136-04						
% Solids	44	48		0.10	% DW				8.21	20
Matrix Spike (19I0073-MS1)		Sourc	e: 1908:	136-05						
% Solids	64	62		0.10	% DW			80-120		
Matrix Spike Dup (19I0073-MS	01)	Sourc	e: 1908:	136-05						
% Solids	64	58		0.10	% DW			80-120	5.98	20



Prepared: Aug-30-19 Analyzed: Sep-19-19

WORK ORDER: 1908101 COC Number:

Project: RWB6_General_2019

PO Number:

Project Manager: Emily Cushman

Project #:[none]

Quality Control

(Continued)

Organochlorine Pesticides by EPA 8081

Water Board

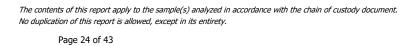
1001 I Street

Sacramento, CA 95814

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Batch: 19I0211 Analyst: NG

Blank (19I0211-BLK1)			
2,4'-DDE	ND	0.0000002	ug/kg wet
2,4'-DDT	ND	0.0000002	ug/kg wet
Alpha-BHC	ND	0.00004	ug/kg wet
Hexachlorobenzene	ND	0.00004	ug/kg wet
Lindane	ND	0.00004	ug/kg wet
Beta-BHC	ND	0.00004	ug/kg wet
Delta-BHC	ND	0.00004	ug/kg wet
Heptachlor	ND	0.00004	ug/kg wet
Aldrin	ND	0.00004	ug/kg wet
Heptachlor epoxide	ND	0.00004	ug/kg wet
2,4 DDE	ND	0.00004	ug/kg wet
Gamma chlordane	ND	0.00004	ug/kg wet
Alpha chlordane	ND	0.00004	ug/kg wet
Endosulfan I	ND	0.00004	ug/kg wet
4,4' DDE	ND	0.00004	ug/kg wet
2,4'-DDD	ND	0.00004	ug/kg wet
Dieldrin	ND	0.00004	ug/kg wet
Perthane	ND	0.00004	ug/kg wet
Endrin	ND	0.00004	ug/kg wet
2,4 DDT	ND	0.00004	ug/kg wet
cis-Nonachlor	ND	0.00004	ug/kg wet
4,4' DDD	ND	0.00004	ug/kg wet
Endosulfan II	ND	0.00004	ug/kg wet
Endrin aldehyde	ND	0.00004	ug/kg wet
4,4' DDT	ND	0.00004	ug/kg wet
Endosulfan sulfate	ND	0.00004	ug/kg wet
Methoxychlor	ND	0.00004	ug/kg wet
Endrin Ketone	ND	0.00004	ug/kg wet
Mirex	ND	0.00004	ug/kg wet
Dicofol	ND	0.00004	ug/kg wet





Prepared: Aug-30-19 Analyzed: Sep-19-19

WORK ORDER: 1908101 COC Number:

Project: RWB6_General_2019

PO Number:

Project Manager: Emily Cushman

Project #:[none]

Quality Control

(Continued)

Organochlorine Pesticides by EPA 8081 (Continued)

Analyte Source Result Qual Reporting Unit Spike % %REC RPD RPD Result Limit Level REC Limits Limit
--

Batch: 19I0211 (Continued)

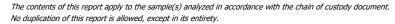
Analyst: NG

Blank (19I0211-BLK1)

Water Board

1001 I Street

Didiik (1310211 DEK1)						
Surrogate: 2-Fluorobiphenyl	1260		ug/kg wet	1950	64.6	<i>15-150</i>
LCS (19I0211-BS1)						
2,4'-DDT	ND	0.0000002	ug/kg wet			70-130
2,4'-DDE	ND	0.0000002	ug/kg wet			70-130
Alpha-BHC	295	0.00004	ug/kg wet	197	149	15-150
Hexachlorobenzene	216	0.00004	ug/kg wet	197	109	15-150
Lindane	176	0.00004	ug/kg wet	197	89.2	15-150
Beta-BHC	156	0.00004	ug/kg wet	197	79.2	15-150
Delta-BHC	187	0.00004	ug/kg wet	197	94.5	15-150
Heptachlor	65.6	0.00004	ug/kg wet	197	33.2	15-150
Aldrin	224	0.00004	ug/kg wet	197	114	15-150
Heptachlor epoxide	237	0.00004	ug/kg wet	197	120	15-150
Gamma chlordane	249	0.00004	ug/kg wet	197	126	15-150
Alpha chlordane	257	0.00004	ug/kg wet	197	130	15-150
Endosulfan I	284	0.00004	ug/kg wet	197	144	15-150
4,4' DDE	253	0.00004	ug/kg wet	197	128	15-150
2,4'-DDD	ND	0.0000002	ug/kg wet			70-130
Dieldrin	221	0.00004	ug/kg wet	197	112	15-150
Perthane	ND	0.0000002	ug/kg wet			70-130
Endrin	90.8	0.00004	ug/kg wet	197	46.0	15-150
4,4' DDD	241	0.00004	ug/kg wet	197	122	15-150
Endosulfan II	207	0.00004	ug/kg wet	197	105	15-150
Endrin aldehyde	237	0.00004	ug/kg wet	197	120	15-150
4,4' DDT	37.1	0.00004	ug/kg wet	197	18.8	15-150
Endosulfan sulfate	208	0.00004	ug/kg wet	197	105	15-150
Methoxychlor	183	0.00004	ug/kg wet	197	92.7	15-150
Endrin Ketone	201	0.00004	ug/kg wet	197	102	15-150
Mirex	151	0.00004	ug/kg wet	197	76.6	15-150
Dicofol	1380	0.00004	ug/kg wet	1970	69.8	15-150





Prepared: Aug-30-19 Analyzed: Sep-19-19

WORK ORDER: 1908101 COC Number:

Project: RWB6_General_2019

PO Number:

Project Manager: Emily Cushman

Project #:[none]

Quality Control

(Continued)

Organochlorine Pesticides by EPA 8081 (Continued)

Source Reporting Spike % %REC **RPD Analyte** Qual Unit Result **RPD** Result Limit Level **REC** Limits Limit

Batch: 19I0211 (Continued)

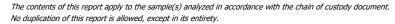
Analyst: NG

LCS (19I0211-BS1)

Water Board

1001 I Street

Surrogate: 2-Fluorobiphenyl	2370		ug/kg wet	1970	120	15-150		
LCS Dup (19I0211-BSD1)								
2,4'-DDE	ND	0.0000002	ug/kg wet			70-130		30
2,4'-DDT	ND	0.0000002	ug/kg wet			70-130		30
Alpha-BHC	246	0.00004	ug/kg wet	198	124	15-150	18.1	50
Hexachlorobenzene	179	0.00004	ug/kg wet	198	90.4	15-150	18.7	50
Lindane	149	0.00004	ug/kg wet	198	75.4	15-150	16.6	50
Beta-BHC	129	0.00004	ug/kg wet	198	65.0	15-150	19.5	50
Delta-BHC	161	0.00004	ug/kg wet	198	81.4	15-150	14.7	50
Heptachlor	58.4	0.00004	ug/kg wet	198	29.5	15-150	11.6	50
Aldrin	183	0.00004	ug/kg wet	198	92.5	15-150	20.4	50
Heptachlor epoxide	197	0.00004	ug/kg wet	198	99.4	15-150	18.6	50
Gamma chlordane	207	0.00004	ug/kg wet	198	105	15-150	18.3	50
Alpha chlordane	217	0.00004	ug/kg wet	198	110	15-150	17.1	50
Endosulfan I	241	0.00004	ug/kg wet	198	122	15-150	16.5	50
4,4' DDE	220	0.00004	ug/kg wet	198	111	15-150	13.9	50
2,4'-DDD	ND	0.0000002	ug/kg wet			70-130		30
Dieldrin	246	0.00004	ug/kg wet	198	124	15-150	10.4	50
Perthane	ND	0.0000002	ug/kg wet			70-130		30
Endrin	75.0	0.00004	ug/kg wet	198	37.9	15-150	19.1	50
4,4' DDD	278	0.00004	ug/kg wet	198	141	15-150	14.2	50
Endosulfan II	208	0.00004	ug/kg wet	198	105	15-150	0.670	50
Endrin aldehyde	203	0.00004	ug/kg wet	198	102	15-150	15.6	50
4,4' DDT	38.4	0.00004	ug/kg wet	198	19.4	15-150	3.34	50
Endosulfan sulfate	196	0.00004	ug/kg wet	198	98.9	15-150	5.98	50
Methoxychlor	224	0.00004	ug/kg wet	198	113	15-150	20.0	50
Endrin Ketone	186	0.00004	ug/kg wet	198	94.2	15-150	7.37	50
Mirex	134	0.00004	ug/kg wet	198	67.5	15-150	12.4	50
Dicofol	1060	0.00004	ug/kg wet	1980	53.4	15-150	26.4	50





Prepared: Aug-30-19 Analyzed: Sep-19-19

WORK ORDER: 1908101 COC Number:

Water Board Project: RWB6_General_2019

PO Number:

Project Manager: Emily Cushman

Project #:[none]

Quality Control

(Continued)

Organochlorine Pesticides by EPA 8081 (Continued)

Analyte Source Result Qual Reporting Unit Result	Spike Level	% REC	%REC Limits	RPD	RPD Limit	
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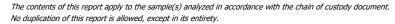
Batch: 19I0211 (Continued)

Analyst: NG

LCS Dup (19I0211-BSD1)

1001 I Street

Surrogate: 2-Fluorobiphenyl		1820		ug/kg wet	1980	91.8	<i>15-150</i>		
Duplicate (19I0211-DUP1)		Source:	1908101-03						
2,4'-DDT		ND	0.00000005	ug/kg dry					30
2,4'-DDE		ND	0.00000005	ug/kg dry					30
Alpha-BHC	ND	ND	0.00001	ug/kg dry					200
Hexachlorobenzene	ND	ND	0.00001	ug/kg dry					200
Lindane	ND	ND	0.00001	ug/kg dry					200
Beta-BHC	ND	ND	0.00001	ug/kg dry					200
Delta-BHC	ND	ND	0.00001	ug/kg dry					200
Heptachlor	ND	ND	0.00001	ug/kg dry					200
Aldrin	ND	ND	0.00001	ug/kg dry					200
Heptachlor epoxide	ND	ND	0.00001	ug/kg dry					200
2,4 DDE	ND	ND	0.00001	ug/kg dry					200
Gamma chlordane	ND	ND	0.00001	ug/kg dry					200
Alpha chlordane	ND	ND	0.00001	ug/kg dry					200
Endosulfan I	ND	ND	0.00001	ug/kg dry					200
4,4' DDE	ND	ND	0.00001	ug/kg dry					200
2,4'-DDD	ND	ND	0.00001	ug/kg dry					200
Dieldrin	ND	ND	0.00001	ug/kg dry					200
Perthane	ND	ND	0.00001	ug/kg dry					200
Endrin	21.4	22.4	0.00001	ug/kg dry				4.50	200
2,4 DDT	ND	ND	0.00001	ug/kg dry					200
cis-Nonachlor	ND	ND	0.00001	ug/kg dry					200
4,4' DDD	ND	ND	0.00001	ug/kg dry					200
Endosulfan II	ND	ND	0.00001	ug/kg dry					200
Endrin aldehyde	ND	ND	0.00001	ug/kg dry					200
4,4' DDT	ND	ND	0.00001	ug/kg dry					200
Endosulfan sulfate	ND	ND	0.00001	ug/kg dry					200
Methoxychlor	ND	ND	0.00001	ug/kg dry					200





Prepared: Aug-30-19 Analyzed: Sep-19-19

WORK ORDER: 1908101 COC Number:

Water Board

1001 I Street

Sacramento, CA 95814

Project: RWB6_General_2019

PO Number:

Project Manager: Emily Cushman

Project #:[none]

Quality Control

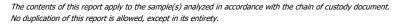
(Continued)

Organochlorine Pesticides by EPA 8081 (Continued)

Analyte	Source Result	Result	Qual	Reporting Limit	Unit	Spike Level	% REC	%REC Limits	RPD	RPD Limit	

Batch: 19I0211 (Continued) Analyst: NG **Duplicate (19I0211-DUP1)** Source: 1908101-03 **Endrin Ketone** ND ND 0.00001 200 ug/kg dry ND Mirex ND 0.00001 ug/kg dry 200 Dicofol ND ND 0.00001 ug/kg dry 30 Surrogate: 2-Fluorobiphenyl 348 659 52.8 *15-150* ug/kg dry Matrix Spike (19I0211-MS1) Source: 1908101-01 Alpha-BHC ND 63.8 0.00001 69.2 92.3 15-150 ug/kg dry Hexachlorobenzene ND 78.4 0.00001 69.2 113 15-150 ug/kg dry Lindane ND 29.5 0.00001 ug/kg dry 69.2 42.6 15-150 **Beta-BHC** ND 18.5 0.00001 ug/kg dry 69.2 26.8 15-150 **Delta-BHC** 69.2 ND 97.7 0.00001 141 15-150 ug/kg dry Aldrin ND 76 2 0.00001 ug/kg dry 69.2 110 15-150 **Heptachlor epoxide** ND 50.2 0.00001 69.2 72.6 15-150 ug/kg dry 2,4 DDE ND ND 0.00001 15-150 ug/kg dry **Gamma chlordane** ND 56.8 0.00001 ug/kg dry 69.2 82.1 15-150 Alpha chlordane ND 58.9 0.00001 69.2 85.2 ug/kg dry 15-150 **Endosulfan I** ND 75.1 0.00001 69.2 109 15-150 ug/kg dry 4,4' DDE ND 77.0 0.00001 ug/kg dry 69.2 111 15-150 2,4'-DDD ND ND 0.00001 ug/kg dry 15-150 Dieldrin ND 83.4 0.00001 ug/kg dry 69.2 121 15-150 **Perthane** ND ND 0.00001 15-150 ug/kg dry **Endrin** ND 24.8 0.00001 69.2 35.8 15-150 ug/kg dry 2,4 DDT ND ND 0.00001 15-150 ug/kg dry 4,4' DDD ND 48.3 0.00001 ug/kg dry 69.2 69.9 15-150 ND 69.2 **Endosulfan II** 63.1 0.00001 91.3 15-150 ug/kg dry **Endrin aldehvde** ND 66.2 0.00001 ug/kg dry 69.2 95.7 15-150 **Endosulfan sulfate** ND 79.7 0.00001 69.2 ug/kg dry 115 15-150 Methoxychlor ND 94.5 0.00001 ug/kg dry 69.2 137 15-150 **Endrin Ketone** ND 63.4 0.00001 ug/kg dry 69.2 91.7 15-150

0.00001



ND

12.2



15-150

69.2

ug/kg dry

17.7

Mirex

Prepared: Aug-30-19 Analyzed: Sep-19-19

WORK ORDER: 1908101 COC Number:

Water Board

1001 I Street

Sacramento, CA 95814

Project: RWB6_General_2019

PO Number:

Project Manager: Emily Cushman

Project #:[none]

Quality Control

(Continued)

Organochlorine Pesticides by EPA 8081 (Continued)

Analyte	Source Result	Result	Qual	Reporting Limit	Unit	Spike Level	% REC	%REC Limits	RPD	RPD Limit	

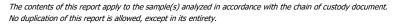
Batch: 19I0211 (Continued) Analyst: NG Matrix Spike (19I0211-MS1) Source: 1908101-01 ND 210 0.00001 30.3 **Dicofol** ug/kg dry 692 15-150 692 Surrogate: 2-Fluorobiphenyl 846 ug/kg dry 122 *15-150* Matrix Spike Dup (19I0211-MSD1) Source: 1908101-01 Alpha-BHC ND 62.3 0.00001 ug/kg dry 69.9 89.1 15-150 2.45 50 Hexachlorobenzene ND 78.2 0.00001 ug/kg dry 69.9 112 15-150 0.164 50 Lindane ND 0.00001 69.9 31.7 15-150 28.3 50 22.2 ug/kg dry Beta-BHC ND 21.3 0.00001 69.9 30.4 15-150 13.7 50 ug/kg dry **Delta-BHC** ND 103 0.00001 ug/kg dry 69.9 147 15-150 5.31 50 **Aldrin** ND 77.4 0.00001 69.9 15-150 50 ug/kg dry 111 1.53 **Heptachlor** epoxide ND 49.6 0.00001 69.9 70.9 15-150 ug/kg dry 1.29 50 2,4 DDE ND ND 0.00001 ug/kg dry 15-150 50 **Gamma chlordane** ND 57.7 0.00001 69.9 82.6 15-150 1.69 50 ug/kg dry Alpha chlordane ND 0.00001 69.9 87.7 15-150 3.97 50 61.3 ug/kg dry **Endosulfan I** ND 72.5 0.00001 ug/kg dry 69.9 104 15-150 3.54 50 4,4' DDE ND 0.00001 122 84 9 69.9 15-150 9.84 50 ug/kg dry 2,4'-DDD ND ND 0.00001 50 15-150 ug/kg dry Dieldrin ND 88.1 0.00001 69.9 126 15-150 5.46 50 ug/kg dry **Perthane** ND ND 0.00001 15-150 50 ug/kg dry **Endrin** ND 25.1 0.00001 ug/kg dry 69.9 35.9 15-150 1.36 50 2,4 DDT ND ND 0.00001 15-150 50 ug/kg dry 4,4' DDD ND 50.5 0.00001 69.9 72.2 15-150 4.32 50 ug/kg dry **Endosulfan II** ND 57.7 0.00001 69.9 82.5 15-150 9.05 50 ug/kg dry **Endrin aldehyde** ND 102 0.00001 ug/kg dry 69.9 146 15-150 42.7 50 ND **Endosulfan sulfate** 80.8 0.00001 69.9 15-150 1.34 50 ug/kg dry 116 Methoxychlor ND 98.2 0.00001 ug/kg dry 69.9 140 15-150 3.89 50 ND 0.00001 81.3 10.9 **Endrin Ketone** 56.8 ug/kg dry 69.9 15-150 50 Mirex ND 10.8 0.00001 69.9 15.4 15-150 12.8 50 ug/kg dry

0.00001

ug/kg dry

699

29.7



ND

207



15-150

1.12

50

Dicofol

Prepared: Aug-30-19 Analyzed: Sep-19-19

WORK ORDER: 1908101 COC Number:

Water Board Project: RWB6_General_2019

PO Number:

Project Manager: Emily Cushman

Project #:[none]

Quality Control

(Continued)

Organochlorine Pesticides by EPA 8081 (Continued)

1001 I Street

Sacramento, CA 95814

Source Reporting Spike % %REC **RPD Analyte** Qual Unit Result **RPD** Result Limit Level **REC** Limits Limit

Batch: 19I0211 (Continued)

Analyst: NG

Matrix Spike Dup (19I0211-MSD1) Source: 1908101-01

 Surrogate: 2-Fluorobiphenyl
 807
 ug/kg dry
 699
 115
 15-150



WORK ORDER: 1908101 COC Number:

Project: RWB6_General_2019

PO Number:

Project Manager: Emily Cushman

Project #:[none]

Quality Control

(Continued)

Organophosphorus Pesticides

Water Board

1001 I Street

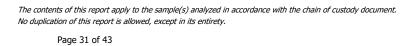
Sacramento, CA 95814

Prepared: Aug-30-19 Analyzed: Sep-19-19

Analyte Source Result Qual Reporting Unit Spike % %REC Result Limit Level REC Limits	RPD RPD Limit	
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Batch: 19I0228 Analyst: NG

Blank (19I0228-BLK1)		
Atrazine	0.00	ug/kg dw
Dichlorvos (DDVS)	0.00	wet ug/kg dw
Dicilior vos (DDV3)	0.00	ug/kg uw wet
Mevinphos (Phosdrin)	0.00	ug/kg dw
		wet
Demeton-O	0.00	ug/kg dw
		wet
Ethoprop	0.00	ug/kg dw wet
Naled (Dibrom)	0.00	ug/kg dw
Naica (Dibroin)	0.00	wet
Phorate	0.00	ug/kg dw
		wet
Demeton-S	0.00	ug/kg dw
		wet
Dimethoate	0.00	ug/kg dw
Diazinon	0.00	wet ug/kg dw
Diazilion	0.00	wet
Disulfoton	0.00	ug/kg dw
		wet
Methyl Parathion	0.00	ug/kg dw
		wet
Ronnel (Fenchlorphos)	0.00	ug/kg dw wet
Malathion	0.00	ug/kg dw
	0.00	wet
Fenthion	0.00	ug/kg dw
		wet
Chlorpyrifos	0.00	ug/kg dw
Eth I Decelle (Decel	0.00	wet
Ethyl Parathion/Prowl	0.00	ug/kg dw wet
		WEL





WORK ORDER: 1908101 COC Number:

Project: RWB6_General_2019

PO Number:

Project Manager: Emily Cushman

Project #:[none]

Quality Control

(Continued)

Organophosphorus Pesticides (Continued)

Water Board

1001 I Street

Sacramento, CA 95814

Organophosphorus Pesticides	(Continued)					Prepa	red: Aug	g-30-19 Ar	nalyzed:	Sep-19-19
Analyte	Source Result	Result	Qual	Reporting Limit	Unit	Spike Level	% REC	%REC Limits	RPD	RPD Limit

Batch: 19I0228 (Continued) Analyst: NG Blank (19I0228-BLK1) Merphos 0.00 ug/kg dw wet **Trichloronate** 0.00 ug/kg dw wet Methidathion 0.00 ug/kg dw wet Tetrachlorvinphos 0.00 ug/kg dw **Tokuthion (Prothiofos)** 0.00 ug/kg dw wet Chlorzoxazone 0.00 ug/kg dw wet **Fensulfothion** 0.00 ug/kg dw wet **Ethion** 0.00 ug/kg dw wet **Bolstar (Sulprofos)** 0.00 ug/kg dw wet **Phosmet** 0.00 ug/kg dw wet **Azinphos methyl (Guthion)** 0.00 ug/kg dw wet Coumaphos (Co-Ral) 0.00 ug/kg dw wet Surrogate: Nitrobenzene-d5 1640 ug/kg dw 1950 84.1 15-150 wet Surrogate: 2-Fluorobiphenyl 1060 1950 54.2 15-150 ug/kg dw wet 1950 1680 Surrogate: p-Terphenyl-d14 86.3 *15-150* ug/kg dw wet LCS (19I0228-BS1)

Atrazine 0.00 15-150 ug/kg dw wet



Prepared: Aug-30-19 Analyzed: Sep-19-19

WORK ORDER: 1908101 COC Number:

Water Board Project: RWB6_General_2019

PO Number:

Project Manager: Emily Cushman

Project #:[none]

Quality Control

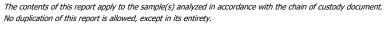
(Continued)

Organophosphorus Pesticides (Continued)

1001 I Street

Analyte	Source Result	Result	Qual	Reporting Limit	Unit	Spike Level	% REC	%REC Limits	RPD	RPD Limit
Batch: 19I0228 (Continued)									Analys	st: NG

Batch: 1910228 (Continued)						Analyst: N
LCS (19I0228-BS1)						
Dichlorvos (DDVS)	0.00	ug/kg dw wet			15-150	
Mevinphos (Phosdrin)	0.00	ug/kg dw wet			15-150	
Demeton-O	15.4	ug/kg dw wet	61.2	25.2	0-200	
Ethoprop	0.00	ug/kg dw wet			15-150	
Naled (Dibrom)	0.00	ug/kg dw wet			15-150	
Phorate	0.00	ug/kg dw wet			15-150	
Demeton-S	34.2	ug/kg dw wet	120	28.4	0-200	
Dimethoate	0.00	ug/kg dw wet			15-150	
Diazinon	216	ug/kg dw wet	197	110	15-150	
Disulfoton	88.9	ug/kg dw wet	197	45.0	15-150	
Methyl Parathion	92.8	ug/kg dw wet	197	47.0	15-150	
Ronnel (Fenchlorphos)	0.00	ug/kg dw wet			15-150	
Malathion	140	ug/kg dw wet	197	70.8	15-150	
Fenthion	0.00	ug/kg dw wet			15-150	
Chlorpyrifos	0.00	ug/kg dw wet			15-150	
Ethyl Parathion/Prowl	120	ug/kg dw wet			15-150	
Merphos	0.00	ug/kg dw wet			15-150	





Prepared: Aug-30-19 Analyzed: Sep-19-19

WORK ORDER: 1908101 COC Number:

Water Board Project: RWB6_General_2019

PO Number:

Project Manager: Emily Cushman

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Project #:[none]

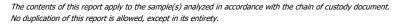
Quality Control

(Continued)

Organophosphorus Pesticides (Continued)

1001 I Street

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Analyte	Source Result	Result	Qual	Reporting Limit	Unit	Spike Level	% REC	%REC Limits	RPD	RPD Limit
Batch: 1910228 (Continued)									Analy	st: NG
LCS (19I0228-BS1)										
Methidathion		0.00		1	ug/kg dw			15-150		
Trichloronate		0.00		1	wet ug/kg dw wet			15-150		
Tetrachlorvinphos		0.00		ı	ug/kg dw wet			15-150		
Tokuthion (Prothiofos)		0.00		1	ug/kg dw wet			15-150		
Chlorzoxazone		0.00		ı	ug/kg dw wet			15-150		
Fensulfothion		0.00		ı	ug/kg dw wet			15-150		
Ethion		207		1	ug/kg dw wet	197	105	15-150		
Bolstar (Sulprofos)		0.00		1	ug/kg dw wet			15-150		
Phosmet		0.00		1	ug/kg dw wet			15-150		
Azinphos methyl (Guthion)		32.8		ı	ug/kg dw wet	197	16.6	15-150		
Coumaphos (Co-Ral)		0.00		ı	ug/kg dw wet			15-150		
Surrogate: Nitrobenzene-d5		1750			ug/kg dw wet	1970	88.6	15-150		
Surrogate: 2-Fluorobiphenyl		1240			wet ug/kg dw wet	1970	63.0	15-150		
Surrogate: p-Terphenyl-d14		1660			ug/kg dw wet	1970	84.1	<i>15-150</i>		
LCS Dup (19I0228-BSD1)										
Dichlorvos (DDVS)		0.00		ı	ug/kg dw wet			15-150		30
Atrazine		0.00		1	ug/kg dw			15-150		30





WORK ORDER: 1908101 COC Number:

Water Board Project: RWB6_General_2019

PO Number:

Project Manager: Emily Cushman

Project #:[none]

Quality Control (Continued)

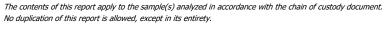
Organophosphorus Pesticides (Continued)

1001 I Street

Sacramento, CA 95814

Prepared: Aug-30-19 Analyzed: Sep-19-19

Analyte	Source Result	Result	Qual	Reporting Limit	Unit	Spike Level	% REC	%REC Limits	RPD	RPD Limit
Batch: 19I0228 (Continued)									Analys	st: NG
LCS Dup (19I0228-BSD1)										
Mevinphos (Phosdrin)		0.00			ug/kg dw			15-150		30
Demeton-O		14.8			wet ug/kg dw	61.3	24.2	0-200	3.73	200
Demeton 0		14.0			wet	01.5	21.2	0 200	3.73	200
Ethoprop		0.00			ug/kg dw			15-150		30
					wet					
Naled (Dibrom)		0.00			ug/kg dw			15-150		30
Plant 1		0.00			wet			45 450		20
Phorate		0.00			ug/kg dw wet			15-150		30
Demeton-S		36.2			wet ug/kg dw	121	30.0	0-200	5.81	200
		55.2			wet	121	50.0	0 200	5.01	200
Dimethoate		0.00			ug/kg dw			15-150		30
					wet					
Diazinon		180			ug/kg dw	198	91.2	15-150	18.1	30
					wet					
Disulfoton		89.0			ug/kg dw	198	45.0	15-150	0.194	30
Mathyd Dayathiau		75.4			wet	100	20.1	15 150	20.7	20
Methyl Parathion		75.4			ug/kg dw wet	198	38.1	15-150	20.7	30
Ronnel (Fenchlorphos)		0.00			ug/kg dw			15-150		30
nome: (r enemerphosy		0.00			wet			10 100		
Malathion		119			ug/kg dw	198	60.0	15-150	16.3	30
					wet					
Fenthion		0.00			ug/kg dw			15-150		30
					wet					
Chlorpyrifos		0.00			ug/kg dw			15-150		30
Ethyl Parathion/Prowl		0.00			wet ug/kg dw			15-150		30
Early raidamon, riowi		0.00			wet			13.130		50
Merphos		0.00			ug/kg dw			15-150		30
•					wet					
Trichloronate		0.00			ug/kg dw			15-150		30
					wet					





WORK ORDER: 1908101 COC Number:

Water Board Project: RWB6_General_2019

PO Number:

Project Manager: Emily Cushman

Project #:[none]

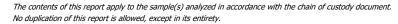
Quality Control (Continued)

Organophosphorus Pesticides (Continued)

1001 I Street

Prepared: Aug-30-19 Analyzed: Sep-19-19

Analyte	Source Result	Result	Qual	Reporting Limit	Unit	Spike Level	% REC	%REC Limits	RPD	RPD Limit
Batch: 19I0228 (Continued)									Analy	st: NG
LCS Dup (19I0228-BSD1)										
Methidathion		0.00			ug/kg dw			15-150		30
					wet					
Tetrachlorvinphos		0.00			ug/kg dw			15-150		30
Takuthian (Drathiafas)		0.00			wet			15-150		30
Tokuthion (Prothiofos)		0.00			ug/kg dw wet			15-150		30
Chlorzoxazone		0.00			ug/kg dw			15-150		30
Cinor 20x d 20 i C		0.00			wet			15 150		30
Fensulfothion		0.00			ug/kg dw			15-150		30
					wet					
Ethion		200			ug/kg dw	198	101	15-150	3.40	30
					wet					
Bolstar (Sulprofos)		0.00			ug/kg dw			15-150		30
Phosmet		0.00			wet			15 150		20
Phosmet		0.00			ug/kg dw wet			15-150		30
Azinphos methyl (Guthion)		30.9			ug/kg dw	198	15.6	15-150	6.02	30
rangines meany. (casinon,		33.5			wet	200	10.0	10 100	0.02	
Coumaphos (Co-Ral)		0.00			ug/kg dw			15-150		30
					wet					
Surrogate: Nitrobenzene-d5		<i>1480</i>			ug/kg dw	1980	74.7	<i>15-150</i>		
Surrogate: 2-Fluorobiphenyl		972			wet ug/kg dw	1980	49.1	<i>15-150</i>		
Sarrogater 2 Tracrosspinenty.		372			wet	1500	15.1	13 130		
Surrogate: p-Terphenyl-d14		1350			ug/kg dw	1980	68.5	<i>15-150</i>		
					wet					
Duplicate (19I0228-DUP1)		Sour	ce: 19081	01-04						
Atrazine	0.00	0.00			ug/kg dw					30
					dry					
Dichlorvos (DDVS)	0.00	0.00			ug/kg dw					30
					dry					
Mevinphos (Phosdrin)	0.00	0.00			ug/kg dw					30
					dry					





Prepared: Aug-30-19 Analyzed: Sep-19-19

WORK ORDER: 1908101 COC Number:

Project: RWB6_General_2019

PO Number:

Project Manager: Emily Cushman

Project #:[none]

Quality Control

(Continued)

Organophosphorus Pesticides (Continued)

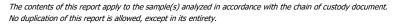
Water Board

1001 I Street

Sacramento, CA 95814

	•	•				•				•
Analyte	Source Result	Result	Qual	Reporting Limit	Unit	Spike Level	% REC	%REC Limits	RPD	RPD Limit

Batch: 19I0228 (Continued) Analyst: NG **Duplicate (19I0228-DUP1)** Source: 1908101-04 **Demeton-O** 0.00 0.00 ug/kg dw 200 dry 0.00 0.00 30 **Ethoprop** ug/kg dw dry Naled (Dibrom) 0.00 0.00 30 ug/kg dw dry 0.00 **Phorate** 0.00 30 ug/kg dw dry **Demeton-S** 0.00 0.00 ug/kg dw 200 dry **Dimethoate** 0.00 0.00 ug/kg dw 30 dry Diazinon 0.00 0.00 ug/kg dw 30 dry Disulfoton 0.00 0.00 30 ug/kg dw dry **Methyl Parathion** 0.00 0.00 30 ug/kg dw dry **Ronnel (Fenchlorphos)** 0.00 0.00 30 ug/kg dw dry Malathion 0.00 0.00 ug/kg dw 30 dry **Fenthion** 0.00 0.00 30 ug/kg dw dry Chlorpyrifos 0.00 0.00 ug/kg dw 30 dry **Ethyl Parathion/Prowl** 0.00 0.00 30 ug/kg dw dry 0.00 0.00 30 Merphos ug/kg dw dry Methidathion 0.00 0.00 ug/kg dw 30 dry **Trichloronate** 0.00 0.00 ug/kg dw 30 dry





Prepared: Aug-30-19 Analyzed: Sep-19-19

WORK ORDER: 1908101 COC Number:

Organophosphorus Pesticides (Continued)

1001 I Street

Sacramento, CA 95814

Water Board Project: RWB6_General_2019

PO Number:

Project Manager: Emily Cushman

dry

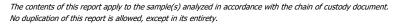
Project #:[none]

Quality Control (Continued)

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	•	•				•				<u> </u>
Analyte	Source Result	Result	Qual	Reporting Limit	Unit	Spike Level	% PEC	%REC	RPD	RPD

Limit Batch: 19I0228 (Continued) Analyst: NG **Duplicate (19I0228-DUP1)** Source: 1908101-04 **Tetrachlorvinphos** 0.00 0.00 30 ug/kg dw dry **Tokuthion (Prothiofos)** 0.00 0.00 ug/kg dw 30 dry 0.00 0.00 Chlorzoxazone 30 ug/kg dw dry **Fensulfothion** 0.00 0.00 ug/kg dw 30 dry **Ethion** 0.00 0.00 ug/kg dw 30 dry **Bolstar (Sulprofos)** 0.00 0.00 ug/kg dw 30 dry 0.00 **Phosmet** 0.00 ug/kg dw 30 dry **Azinphos methyl (Guthion)** 0.00 0.00 30 ug/kg dw dry Coumaphos (Co-Ral) 0.00 0.00 30 ug/kg dw dry 674 37.4 Surrogate: Nitrobenzene-d5 252 15-150 ug/kg dw dry Surrogate: 2-Fluorobiphenyl 674 246 ug/kg dw 36.5 *15-150* dry Surrogate: p-Terphenyl-d14 384 ug/kg dw 674 57.1 *15-150* dry **Matrix Spike (19I0228-MS1)** Source: 1908101-02 Dichlorvos (DDVS) 0.00 0.00 ug/kg dw 15-150 dry **Atrazine** 0.00 0.00 15-150 ug/kg dw dry Mevinphos (Phosdrin) 0.00 0.00 15-150 ug/kg dw dry **Demeton-O** 0.00 4.75 20.4 23.2 0-200 ug/kg dw





Prepared: Aug-30-19 Analyzed: Sep-19-19

WORK ORDER: 1908101 COC Number:

Water Board Project: RWB6_General_2019

PO Number:

Project Manager: Emily Cushman

Project #:[none]

Quality Control (Continued)

Organophosphorus Pesticides (Continued)

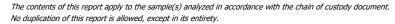
1001 I Street

Sacramento, CA 95814

Batch: 19I0228 (Continued)

Analyst: NG

Matrix Spike (19I0228-MS1)		Source: 1908101-02				
Ethoprop	0.00	0.00	ug/kg dw			15-150
Naled (Dibrom)	0.00	0.00	dry ug/kg dw			15-150
	0.00		dry			10 100
Phorate	0.00	0.00	ug/kg dw dry			15-150
Demeton-S	0.00	11.5	ug/kg dw	40.2	28.7	0-200
			dry			
Dimethoate	0.00	0.00	ug/kg dw dry			15-150
Diazinon	0.00	34.5	ug/kg dw	65.9	52.4	15-150
			dry			
Disulfoton	0.00	21.2	ug/kg dw dry	65.9	32.2	15-150
Methyl Parathion	0.00	12.5	ug/kg dw	65.9	18.9	15-150
			dry			
Ronnel (Fenchlorphos)	0.00	0.00	ug/kg dw			15-150
Malathion	0.00	23.0	dry ug/kg dw	65.9	34.9	15-150
Fiduction	0.00	23.0	dry	03.5	5 1.5	15 150
Fenthion	0.00	0.00	ug/kg dw			15-150
			dry			
Chlorpyrifos	0.00	0.00	ug/kg dw			15-150
Ethyd Dayathian / Dyavid	0.00	0.00	dry			15-150
Ethyl Parathion/Prowl	0.00	0.00	ug/kg dw dry			15-150
Merphos	0.00	0.00	ug/kg dw			15-150
			dry			
Methidathion	0.00	0.00	ug/kg dw			15-150
			dry			
Trichloronate	0.00	0.00	ug/kg dw			15-150
			dry 			
Tetrachlorvinphos	0.00	0.00	ug/kg dw			15-150
			dry			





Prepared: Aug-30-19 Analyzed: Sep-19-19

WORK ORDER: 1908101 COC Number:

Water Board Project: RWB6_General_2019

PO Number:

Project Manager: Emily Cushman

dry

Project #:[none]

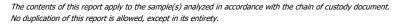
Quality Control

(Continued)

Organophosphorus Pesticides (Continued)

1001 I Street

Analyte	Source Result	Result	Qual	Reporting Limit	Unit	Spike Level	% REC	%REC Limits	RPD	RPD Limit
Batch: 1910228 (Continued)									Analy	st: NG
Matrix Spike (19I0228-MS1)		Sourc	e: 190 81	l 01-02						
Tokuthion (Prothiofos)	0.00	0.00			ug/kg dw dry			15-150		
Chlorzoxazone	0.00	0.00			ug/kg dw dry			15-150		
Fensulfothion	0.00	0.00			ug/kg dw dry			15-150		
Ethion	0.00	32.2			ug/kg dw dry	65.9	48.8	15-150		
Bolstar (Sulprofos)	0.00	0.00			ug/kg dw dry			15-150		
Phosmet	0.00	0.00			ug/kg dw dry			15-150		
Azinphos methyl (Guthion)	0.00	35.4			ug/kg dw dry	65.9	53.7	15-150		
Coumaphos (Co-Ral)	0.00	0.00			ug/kg dw dry			15-150		
Surrogate: Nitrobenzene-d5		156			ug/kg dw dry	659	23.6	15-150		
Surrogate: 2-Fluorobiphenyl		240			ug/kg dw dry	659	36.5	<i>15-150</i>		
Surrogate: p-Terphenyl-d14		264			ug/kg dw dry	659	40.0	15-150		
Matrix Spike Dup (1910228-N	1SD1)	Source	e: 19081	l 01-02						
Atrazine	0.00	0.00			ug/kg dw dry			15-150		30
Dichlorvos (DDVS)	0.00	0.00			ug/kg dw dry			15-150		30
Mevinphos (Phosdrin)	0.00	0.00			ug/kg dw dry			15-150		30
Demeton-O	0.00	3.87			ug/kg dw dry	21.4	18.1	0-200	20.3	200
Ethoprop	0.00	0.00			ug/kg dw			15-150		30





Prepared: Aug-30-19 Analyzed: Sep-19-19

WORK ORDER: 1908101 COC Number:

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dry

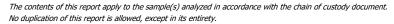
Project #:[none]

Quality Control (Continued)

Organophosphorus Pesticides (Continued)

1001 I Street

Analyte	Source Result	Result	Qual	Reporting Limit	Unit	Spike Level	% REC	%REC Limits	RPD	RPD Limit
Batch: 1910228 (Continued	d)								Analy	st: NG
Matrix Spike Dup (19I0228	B-MSD1)	Sour	ce: 190 8:	101-02						
Naled (Dibrom)	0.00	0.00			ug/kg dw dry			15-150		30
Phorate	0.00	0.00			ug/kg dw dry			15-150		30
Demeton-S	0.00	10.2			ug/kg dw dry	42.2	24.1	0-200	12.6	200
Dimethoate	0.00	0.00			ug/kg dw dry			15-150		30
Diazinon	0.00	39.1			ug/kg dw dry	69.2	56.5	15-150	12.3	30
Disulfoton	0.00	19.2			ug/kg dw dry	69.2	27.7	15-150	10.2	30
Methyl Parathion	0.00	12.9			ug/kg dw dry	69.2	18.7	15-150	3.73	30
Ronnel (Fenchlorphos)	0.00	0.00			ug/kg dw dry			15-150		30
Malathion	0.00	21.4			ug/kg dw dry	69.2	31.0	15-150	7.05	30
Chlorpyrifos	0.00	0.00			ug/kg dw dry			15-150		30
Fenthion	0.00	0.00			ug/kg dw dry			15-150		30
Ethyl Parathion/Prowl	0.00	16.0			ug/kg dw dry			15-150		30
Merphos	0.00	0.00			ug/kg dw dry			15-150		30
Trichloronate	0.00	0.00			ug/kg dw dry			15-150		30
Methidathion	0.00	0.00			ug/kg dw dry			15-150		30
Tetrachlorvinphos	0.00	0.00			ug/kg dw dry			15-150		30
Tokuthion (Prothiofos)	0.00	0.00			ug/kg dw			15-150		30





WORK ORDER: 1908101 COC Number:

Water Board Project: RWB6_General_2019

1001 I Street

Sacramento, CA 95814

Project Manager: Emily Cushman

Project #:[none]

Quality Control

(Continued)

Organophosphorus Pesticides (Continued)

Organophosphorus Pesticide	Prepared: Aug-30-19 Analyzed: Sep-19-19									
Analyte	Source Result	Result	Qual	Reporting Limit	Unit	Spike Level	% REC	%REC Limits	RPD	RPD Limit
Batch: 1910228 (Continued))								Analy	st: NG
Matrix Spike Dup (19I0228-	MSD1)	Sour	ce: 1908:	L01-02						
Chlorzoxazone	0.00	0.00			ug/kg dw dry			15-150		30
Fensulfothion	0.00	0.00			ug/kg dw dry			15-150		30
Ethion	0.00	35.4			ug/kg dw dry	69.2	51.2	15-150	9.59	30
Bolstar (Sulprofos)	0.00	0.00			ug/kg dw dry			15-150		30
Phosmet	0.00	0.00			ug/kg dw dry			15-150		30
Azinphos methyl (Guthion)	0.00	33.8			ug/kg dw dry	69.2	48.8	15-150	4.77	30
Coumaphos (Co-Ral)	0.00	0.00			ug/kg dw dry			15-150		30
Surrogate: Nitrobenzene-d5		146			ug/kg dw dry	692	21.1	15-150		
Surrogate: 2-Fluorobiphenyl		217			ug/kg dw dry	692	31.3	15-150		
Surrogate: p-Terphenyl-d14		268			ug/kg dw dry	692	38.8	15-150		





WORK ORDER: 1908101 COC Number:

1001 I Street

Sacramento, CA 95814

Water Board Project: RWB6_General_2019

PO Number:

Project Manager: Emily Cushman

Project #:[none]

Notes and Definitions

Item	Definition
Dry	Sample results reported on a dry weight basis.
ND	Analyte NOT DETECTED at or above the reporting limit.
%REC	Percent Recovery
DF	Dilution Factor
LCS	Lab Control Sample
LCSD	Lab Control Sample Duplicate
MDL	Minimum Detection Limit
MRL	Minimum Reporting Limit
MS	Matrix Spike
MSD	Matrix Spike Duplicate
RPD	Relative Percent Difference
Source	Sample that was matrix spiked or duplicated
J	Results > MDL but < MRL



Joint Waterboard I Delta Environmental Lab Request for Analysis and Chain of Custody (COC)



Client: \	shorten water	Books	Co	ntact	· ‡(nih	4	ا ا	N	ndr							Benicia, CA 94510 (707)747		Phone No. 530	0-542-5598
State Data		00000		ate Da									TOJO	000	ιο. κ		Results to : em			Additional Reporting Requests
Project Na	ame: Region 6 Ger	neral	_	Turn Around Time: Routi							Rou	tine) *3	3-5 Day	*4	8 Hour *24 Ho	our wat	esocial.	1.61.90	Project Contact:
Project Lo	ocation: Antelope V	alleu	*La	b TAT	App	roval	l:				Ву:			Rush			Rush	*Additional Charges May Apply		
	Sampler Information)	# of Containers & Preservatives										mple ype			Analysis	s Requested		Matrix	Notes
Name: Employer: Signature:	Emily Cust Lahantan Ri Emiley Cu Sample ID	NACB Shuan	-	H2SO4		Na2S203		ZnAce/NaOH NaOH/ZnAcetate	NH4CI	MCAA	Total Containers	Routine		8081R	8 141				S=Solid DW = Drinking Water SW = Source Water GW = Groundwater WW = Wastewater SG = Sludge L = Liquid M = Miscellaneous	Notes
19RB	6CANN 001	2019 1105	X											X					S	Request results
	36CANN002	10/10/	1												X				8	vid email to:
	6CANN003													X					S	
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	36 CANNOOG	- + +												X					S	
19 RB	CANNOU7	8/16/ 0926	0 1												X				S	all samples 402 clear
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Fact Sheet – Requirements for Submitting Technical Reports Under Section 13267 of the California Water Code

October 8, 2008

What does it mean when the regional water board requires a technical report?

Section 13267¹ of the California Water Code provides that "...the regional board may require that any person who has discharged, discharges, or who is suspected of having discharged...waste that could affect the quality of waters...shall furnish, under penalty of perjury, technical or monitoring program reports which the regional board requires".

This requirement for a technical report seems to mean that I am guilty of something, or at least responsible for cleaning something up. What if that is not so?

Providing the required information in a technical report is not an admission of guilt or responsibility. However, the information provided can be used by the regional water board to clarify whether a given party has responsibility.

Are there limits to what the regional water board can ask for?

Yes. The information required must relate to an actual or suspected discharge of waste, and the burden of compliance must bear a reasonable relationship to the need for the report and the benefits obtained. The regional water board is required to explain the reasons for its request.

What if I can provide the information, but not by the date specified?

A time extension can be given for good cause. Your request should be submitted in writing, giving reasons. A request for a time extension should be made as soon as it is apparent that additional time will be needed and preferably before the due date for the information.

Are there penalties if I don't comply?

Depending on the situation, the regional water board can impose a fine of up to \$1,000 per day, and a court can impose fines of up to \$25,000 per day as well as criminal penalties. A person who submits false information is guilty of a misdemeanor and may be fined as well.

What if I disagree with the 13267 requirement and the regional water board staff will not change the requirement and/or date to comply?

Any person aggrieved by this action of the Regional Water Board may petition the State Water Board to review the action in accordance with Water Code section 13320 and California Code of Regulations, title 23, sections 2050 and following. The State Water Board must *receive* the petition by 5:00 p.m., 30 days after the date of the Order, except that if the thirtieth day following the date of this Order falls on a Saturday, Sunday, or state holiday, the petition must be received by the State Water Board by 5:00 p.m. on the next business day. Copies of the law and regulations applicable to filing petitions may be found on the Internet at:

http://www.waterboards.ca.gov/public notices/petitions/water quality or will be provided upon request.

Claim of Copyright or other Protection

Any and all reports and other documents submitted to the Regional Board pursuant to this request will need to be copied for some or all of the following reasons: 1) normal internal use of the document, including staff copies, record copies, copies for Board members and agenda packets, 2) any further proceedings of the Regional Board and the State Water Resources Control Board, 3) any court proceeding that may involve the document, and 4) any copies requested by members of the public pursuant to the Public Records Act or other legal proceeding.

If the discharger or its contractor claims any copyright or other protection, the submittal must include a notice, and the notice will accompany all documents copied for the reasons stated above. If copyright protection for a submitted document is claimed, failure to expressly grant permission for the copying stated above will render the document unusable for the Regional Board's purposes, and will result in the document being returned to the discharger as if the task had not been completed.

If I have more questions, who do I ask?

Requirements for technical reports normally indicate the name, telephone number, and email address of the regional water board staff person involved at the end of the letter.

¹ All code sections referenced herein can be found by going to www.leginfo.ca.gov. Copies of the regulations cited are available from the Regional Board upon request.