



# Department of Pesticide Regulation



Gray Davis  
Governor

Winston H. Hickox  
Secretary, California  
Environmental  
Protection Agency

Paul E. Helliker  
Director

## MEMORANDUM

TO: Environmental Monitoring Staff

FROM: John S. Sanders, Ph.D., Chief  
Environmental Monitoring Branch  
(916) 324-4155

DATE: July 12, 2002

SUBJECT: POLICY ON RESPONSE TO CERTAIN REPORTED DETECTIONS OF  
PESTICIDE IN GROUND WATER

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Historically, the Environmental Monitoring Branch (EM) has responded to all verified reports of pesticide detections in ground water. The response to many of the reports was to conduct a four-section survey in which up to five or six wells were sampled in a four-square mile area around the contaminated well. However, due to shrinking resources, a more selective response is now necessary. The purpose of this memorandum is to define policy concerning the response of EM to reports by other agencies of pesticide detections when the minimum detection limits (MDLs) are below those obtainable by laboratories used by EM.

Each year, EM receives reports of pesticide detections in ground water from a wide variety of sources including federal, state and county agencies. The reported detections may result from field studies, routine monitoring programs or other sources. In some cases, large sets of data describing pesticide detections in ground water or study reports that include extensive tables of data are submitted to EM. The reports usually include MDLs for the analytical procedures used. For the first time, the MDLs for some analytes are below the MDLs obtainable by the laboratories used by EM. The steps described below will be used to determine how EM will respond to those reports. In keeping with past procedures, all reported pesticide detections will be entered into the well inventory database.

The first step taken will be to separate reported detections into two groups: (1) Title 3, CCR section 6800(a) active ingredients that have been determined to be in ground water as a result of legal agricultural use (atrazine, simazine, bromacil, diuron, prometon, bentazon and norflurazon) and (2) active ingredients that are not included in Title 3, CCR section 6800(a).

### **Detections of Title 3, CCR section 6800(a) Active Ingredients**

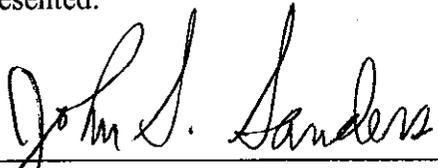
The response by EM to detections of Title 3, CCR section 6800(a) active ingredients depends on whether or not that active ingredient was previously detected in the study area. If the active ingredient is already present in a contaminated area and Pesticide Management Zones (PMZs) have been adopted or recommended, prepare a memorandum ("N" memo) summarizing pertinent information and indicating that no further investigation is necessary.

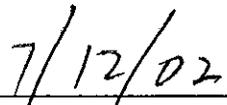


If the active ingredient is "new" to or is located outside of known contaminated areas, determine if the detected concentration is at least 80 percent of the CDFA laboratory's established MDL for that active ingredient. For each detection at or above 80 percent of the MDL, prepare a separate memorandum with a Z study number, requesting a four-section survey as resources allow. For detections below 80 percent of the MDL, prepare a memorandum listing the detections and locations, stating that the detections are below the value 80 percent of the current MDL, and therefore, no investigation will be conducted by EM.

**Detections of Other Active Ingredients**

For each detection of active ingredients other than Title 3, CCR section 6800(a) chemicals, determine if the concentration is 80 percent or more of the CDFA laboratory's established MDL for that active ingredient. If the detection is 80 percent or more of that MDL, prepare a separate memorandum with a Z study number, requesting a four-section survey within 30 days. For detections less than 80 percent of the MDL, prepare a single memorandum listing the detections and locations. Indicate that EM will not investigate these detections unless some justification is presented.

  
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John S. Sanders, Ph.D.

  
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Date