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Study 300: Groundwater Monitoring for DCPA and Its Degradation Products MTP and TPA

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ABSTRACT

Chlorthal-dimethyl (DCPA) is the active ingredient of a pre-emergent herbicide sold in California under the tradename Dacthal[®]. It is primarily used for control of annual grasses and certain broadleaved weeds in various fruit and vegetable crops and in ornamental turf. DCPA has two major degradation products: monomethyl tetrachloroterephthalate (MTP) and 2,3,5,6tetrachloroterephthalic acid (TPA). This report summarizes the findings of Groundwater Study 300 (Study 300): groundwater sampling from water wells in California for DCPA, MTP, and TPA. The motivation and preliminary field sampling plan for Study 300 were documented in the protocol: "Study #300: Protocol for Groundwater Monitoring of DCPA and its Degradates MTP and TPA" (Ruud, 2017). For this study, 45 unique water wells located in six different groundwater basins/sub-basins spanning five counties were sampled from January 2017 through April 2018: 13 wells in the Salinas Valley Groundwater Basin in Monterey County; 18 wells in the Santa Maria River Valley Groundwater Basin in San Luis Obispo and Santa Barbara counties; five wells in the Santa Ynez River Valley Groundwater Basin in Santa Barbara County; one well in the Oxnard Aguifer Sub-basin in Ventura County; one well in the Pleasant Valley Groundwater Basin in Ventura County; and seven wells in the Coachella Valley Groundwater Basin in Riverside County. Forty-three wells were sampled once and two were sampled twice for a total of 47 groundwater samples from the 45 wells. All groundwater samples were analyzed by the California Department of Food and Agriculture's Center for Analytical Chemistry. None of the sampled wells contained detections of DCPA above the reporting limit of 0.05 parts per billion (ppb). Five wells contained detections of MTP with concentrations ranging from 0.056 to 0.13 ppb. Nineteen wells contained detections of TPA with concentrations ranging from 0.121 to 159 ppb. In particular, one well near the city of Greenfield

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in the Salinas Valley contained a TPA detection of 101 ppb and three wells around the city of Guadalupe in the Santa Maria River Valley Groundwater Basin contained TPA detections of 66.5, 133, and 159 ppb. All detections were well below the health-protective drinking water level of 2,500 ppb set for TPA by the Office of Environmental Health Hazard Assessment (OEHHA, 2018).

BACKGROUND

The Pesticide Contamination Prevention Act (PCPA) is recorded in Sections 13141-13152 of the California Food and Agricultural Code (FAC). Currently, Section 13149 mandates that when a pesticide active ingredient (AI), other specified ingredient, or degradation product of a pesticide is detected in groundwater and the contamination is found to be due to legal agricultural use, the California Department of Pesticide Regulation (DPR) is required to conduct a formal review (Pesticide Detection Response Process) to determine if use of the pesticide should continue and, if so, under what conditions.

Chlorthal-dimethyl (DCPA) (tradename: Dacthal[®] [AMVAC, 2015]) is the AI in a number of herbicide products with historic or current use in California. DCPA has two major degradation products: monomethyl tetrachloroterephthalate (MTP) and 2,3,5,6-tetrachloroterephthalic acid (TPA). DPR conducted groundwater sampling studies between 1990 and 1997 in different areas of California where DCPA had been legally used, looking specifically for DCPA, MTP, and TPA. None of the laboratory analyses of the collected samples from those studies yielded a confirmed detection of DCPA or MTP. However, the laboratory analyses did confirm detections of TPA in samples collected in several counties (Ruud, 2017).

The PCPA was originally enacted in 1985 under Assembly Bill 2021 and was significantly revised in 2014 under Senate Bill 1117. Under the 1985 version of the PCPA (i.e., that includes the period from 1990 to 1997 when DPR's previous DCPA sampling studies were conducted), if a degradation product was detected in groundwater, the AI was only entered into the Pesticide Detection Response Process if the concentrations of the degradation product were determined to be high enough to pose a threat to public health. Although confirmed detections of TPA were found between 1990 and 1997, DPR's Medical Toxicology Branch reviewed the available toxicological data for TPA submitted by the registrant and concluded that the levels found in groundwater did not pose a threat to public health (CDPR, 1991). Consequently, DCPA was not entered into the Pesticide Detection Response Process (CDPR, 1992). A health reference level (HRL) of 70 parts per billion (ppb) (or micrograms per liter) was calculated for DCPA by the United States Environmental Protection Agency (USEPA) and adopted as an HRL for TPA and MTP (USEPA, 2008). The HRL of 70 ppb was later adopted by DPR for its monitoring of TPA in groundwater (CDPR, 2012). Since 1997, several agencies have reported detections of TPA in water wells located throughout the state but those measured TPA concentrations were all below the established HRL.

The revision of the PCPA in 2014 lifted the requirement to demonstrate a threat to public health of degradation products found in groundwater. Consequently, an AI is now entered into the Pesticide Detection Response Process when its degradation product is found in groundwater and determined to have originated from legal agricultural use of the parent AI.

Groundwater Study 300 (Study 300) was planned and conducted to assess current concentrations of DCPA, MTP, and TPA in water wells located in regions where historical agricultural use of DCPA had been relatively high and where detections of TPA had been found in previous studies. A subsequent analysis of historic and current detections of DCPA, MTP, and TPA in groundwater as occurrences of non-point source contamination due to legal agricultural use of DCPA was presented in a separate report entitled "Legal Agricultural Use Determination for DCPA Degradate Detections in California" (Ruud, 2018). The determination that the degradate TPA was found in groundwater due to legal agricultural use of DCPA formed the basis for entering DCPA into the Pesticide Detection Response Process in March 2018 per the 2014 revisions to the PCPA (CDPR, 2018a). In August 2018, a public hearing was conducted to formally review the continued use of DCPA in agricultural products registered for use in California (CDPR, 2018b). In December 2018, the Director of DPR concurred with the findings and recommendations of the formal review subcommittee that MTP and TPA had not polluted and do not threaten to pollute the groundwater of the state (CDPR, 2018c). Subsequently, the use of registered DCPA agricultural products was allowed to continue in California. DPR was required to continue monitoring for MTP and TPA to assess concentrations of those constituents in groundwater relative to a health-protective drinking water level of 2,500 ppb set for DCPA, MTP, and TPA by the Office of Environmental Health Hazard Assessment (OEHHA) as part of the formal review process (OEHHA, 2018).

This report summarizes the monitoring results of Study 300 that were used to inform the aforementioned Pesticide Detection Response Process for DCPA. It includes a brief description of the sampling methods for collecting the groundwater samples; the analytical laboratory method and associated quality assurance/quality control (QA/QC) standards used to measure DCPA, MTP, and TPA in groundwater samples; and the results of the laboratory analysis of the collected groundwater samples.

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METHODS

Sampling Methods

The field sampling plan documented in the protocol (Ruud, 2017) included the identification of potential areas from which to choose wells to sample for DCPA, MTP, and TPA. Using Pesticide Use Reporting (PUR) data, five different regions in California were identified as having significant DCPA use between the years 2000 and 2010 (CDPR, 2019a). Each of the five regions included one or more groundwater basins or sub-basins. The protocol also included a map displaying the locations in California with confirmed detections of TPA from sampling that occurred from 1990 through 1997 (CDPR, 2019b). For Study 300, DPR's Groundwater Protection Program (GWPP) collected samples at 45 unique water wells located in six different groundwater basins/sub-basins spanning five counties from January 2017 through April 2018. Forty-three of the 45 wells were sampled once and two of the 45 wells were sampled twice for a total of 47 groundwater samples from the 45 wells. GWPP staff collected samples from the wells using methods described in Standard Operating Procedure (SOP) FSWA001.02 (Nordmark and Herrig, 2011). Geographic location information, well type, and the sampling date(s) for each of the 45 wells are listed in Table 1.

| County | Groundwater Basin/Sub-basin | Public Lands Survey System (Meridian/Township/ Range/Section) | Location Code ¹ | Well Type | Sampling Date |
|----------|--------------------------------|--|----------------------------|--------------|------------------|
| Monterey | Salinas Valley/Eastside | M15S04E22 | 27-01 | domestic | 1/9/2017 |
| Monterey | Salinas Valley/Forebay | M19S07E05 | 27-02** | domestic | 1/10/2017 |
| Monterey | Salinas Valley/Eastside | M16S05E18 | 27-03 | agricultural | 1/11/2017 |
| Monterey | Salinas Valley/Forebay | M18S06E09 | 27-04 | domestic | 1/12/2017 |
| Monterey | Salinas Valley/Forebay | M17S06E32 | 27-05 | domestic | 1/12/2017 |
| Monterey | Salinas Valley/Forebay | M19S06E01 | 27-06* | domestic | 1/12/2017 |
| Monterey | Salinas Valley/Forebay | M18S06E23 | 27-07 | domestic | 1/12/2017 |
| Monterey | Salinas Valley/Eastside | M14S03E35 | 27-08 | agricultural | 5/22/2017 |
| Monterey | Salinas Valley/Forebay | M18S06E36 | 27-09 | municipal | 5/23/2017 |
| Monterey | Salinas Valley/Forebay | M18S07E31 | 27-10 | municipal | 5/23/2017 |
| Monterey | Salinas Valley/Forebay | M19S07E05 | 27-11** | domestic | 5/24/2017 |

| Table 1. Geographic location information, | well type | and sampling | a date of sampled wells |
|---|---|--------------|-------------------------|
| | , ,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,, | and sampling | |

| County | Groundwater Basin/Sub-basin | Public Lands Survey System (Meridian/Township/ Range/Section) | Location Code ¹ | Well Type | Sampling Date |
|--------------------|--------------------------------|--|----------------------------|--------------|------------------|
| Monterey | Salinas Valley/Forebay | M19S06E01 | 27-12* | domestic | 5/24/2017 |
| Monterey | Salinas Valley/Eastside | M15S04E16 | 27-13 | agricultural | 5/24/2017 |
| Monterey | Salinas Valley/Eastside | M15S04E17 | 27-14 | agricultural | 5/25/2017 |
| Monterey | Salinas Valley/Eastside | M15S03E02 | 27-15 | municipal | 6/15/2017 |
| San Luis Obispo | Santa Maria River Valley | M32S13E01 | 40-01 | domestic | 10/11/2017 |
| San Luis Obispo | Santa Maria River Valley | M32S14E18 | 40-02 | domestic | 10/11/2017 |
| Santa Barbara | Santa Ynez River Valley | S06N32W06 | 42-01 | domestic | 10/9/2017 |
| Santa Barbara | Santa Ynez River Valley | S07N33W27 | 42-02 | domestic | 10/9/2017 |
| Santa Barbara | Santa Ynez River Valley | S07N34W35 | 42-03 | domestic | 10/9/2017 |
| Santa Barbara | Santa Maria River Valley | S10N34W18 | 42-04 | domestic | 10/10/2017 |
| Santa Barbara | Santa Maria River Valley | S10N34W17 | 42-05 | domestic | 10/10/2017 |
| Santa Barbara | Santa Maria River Valley | S10N35W09 | 42-06 | municipal | 10/12/2017 |
| Santa Barbara | Santa Maria River Valley | S10N35W09 | 42-07 | municipal | 10/12/2017 |
| San Luis Obispo | Santa Maria River Valley | M32S13E12 | 40-51 | domestic | 11/28/2017 |
| San Luis Obispo | Santa Maria River Valley | M32S13E13 | 40-52 | domestic | 11/28/2017 |
| San Luis Obispo | Santa Maria River Valley | M32S13E28 | 40-53 | domestic | 11/28/2017 |
| San Luis Obispo | Santa Maria River Valley | M32S13E32 | 40-54 | domestic | 11/28/2017 |
| San Luis Obispo | Santa Maria River Valley | S11N35W26 | 40-55 | agricultural | 11/28/2017 |
| Santa Barbara | Santa Maria River Valley | S10N35W09 | 42-61 | domestic | 11/28/2017 |
| Santa Barbara | Santa Maria River Valley | S10N35W23 | 42-62 | domestic | 11/28/2017 |
| Santa Barbara | Santa Maria River Valley | S09N33W02 | 42-63 | domestic | 11/28/2017 |
| Santa Barbara | Santa Ynez River Valley | S07N35W25 | 42-64 | domestic | 11/29/2017 |
| Santa Barbara | Santa Ynez River Valley | S07N35W24 | 42-65 | domestic | 11/29/2017 |
| Santa Barbara | Santa Maria River Valley | S09N34W08 | 42-71 | domestic | 11/29/2017 |

| County | Groundwater Basin/Sub-basin | Public Lands Survey System (Meridian/Township/ Range/Section) | Location Code ¹ | Well Type | Sampling Date |
|------------------|---|--|----------------------------|---------------------------------|------------------|
| Santa Barbara | Santa Maria River Valley | S10N35W08 | 42-72 | domestic | 11/29/2017 |
| Santa Barbara | Santa Maria River Valley | S10N35W10 | 42-73 | domestic | 11/29/2017 |
| Santa Barbara | Santa Maria River Valley | S10N34W17 | 42-74 | agricultural | 11/30/2017 |
| Riverside | Coachella Valley | S07S07E01 | 33-01 | domestic | 3/20/2018 |
| Riverside | Coachella Valley | S07S08E04 | 33-02 | domestic | 3/20/2018 |
| Riverside | Coachella Valley | S07S08E02 | 33-03 | domestic | 3/20/2018 |
| Riverside | Coachella Valley | S08S08E13 | 33-14 | domestic | 3/21/2018 |
| Riverside | Coachella Valley | S08S08E02 | 33-15 | domestic | 3/21/2018 |
| Riverside | Coachella Valley | S07S09E26 | 33-16 | domestic | 3/21/2018 |
| Riverside | Coachella Valley | S07S08E01 | 33-17 | small public water system | 3/22/2018 |
| Ventura | Santa Clara River Valley/Oxnard Aquifer | S01N21W21 | 56-01 | domestic/ agricultural | 4/3/2018 |
| Ventura | Pleasant Valley | S01N21W02 | 56-02 | domestic | 4/4/2018 |

¹ 'Location code' refers to a unique identifier assigned to each sampled well where the first number is the county code and the second number (after the hyphen) represents the sampling position in the sequence of sampled wells in that county.

* Location codes 27-06 and 27-12 refer to the same well (M19S06E01) sampled on two different dates.

**Location codes 27-02 and 27-11 refer to the same well (M19S07E05) sampled on two different dates.

Analytical Methods

Chemical analysis of groundwater samples collected under Study 300 was performed by the California Department of Food and Agriculture's (CDFA) Center for Analytical Chemistry (CAC). CDFA's CAC analyzed samples collected from the wells listed in Table 1 for DCPA, MTP, and TPA using method EMON-SM-05-040 (DCPA Screen) (CDFA, 2016). The PCPA allows a finding of an AI or a degradation product in groundwater by a single analytical laboratory using a single analytical method if the method provides unequivocal identification of those chemicals (FAC § 13149[d]). SOP QAQC001.01 (Peoples, 2019) updated the previous SOP QAQC001.00 (Segawa, 1995) to reflect this verification requirement. Although SOP QAQC001.00 (Segawa, 1995) had not yet been updated at the time Study 300 was conducted, this verification requirement (as documented in SOP QAQC001.01 [Peoples, 2019]) was nevertheless followed in this study. The criterion to identify methods providing unequivocal identification of a chemical are further provided in Aggarwal (2012). Unequivocal identification of EMON-SM-05-040 was established and documented in Aggarwal (2017). The method detection limits for DCPA, MTP, and TPA using method EMON-SM-05-040 were 0.00629, 0.0155, and 0.0313 ppb, respectively (CDFA,

2016). The reporting limit for all chemicals in Table 2 was 0.05 ppb. A 'trace' detection is defined as a measured concentration between a method's detection limit and the reporting limit of 0.05 ppb.

| Multi-Analyte Screen* (LCMS Method) | | Multi-Analyte Screen* (GCMS Method) | Triazine Screen* | DCPA Screen |
|--|--------------------------------------|---|-------------------|----------------|
| EMON-SN | Л-05-032 | EMON-SM-05-032 | EMON-SM-62.9 | EMON-SM-05-040 |
| Atrazine** | Linuron | Clomazone | ACET ² | DCPA |
| Azinphos- methyl | Mefenoxam/ Metalaxyl ¹ | Dichloran | Atrazine** | МТР |
| Azoxystrobin | Methiocarb | Dichlobenil | Bromacil** | TPA |
| Bensulide | Metolachlor | Disulfoton | DACT ³ | |
| Bromacil** | Metribuzin | Ethoprophos | DEA ⁴ | |
| Carbaryl | Napropamide | Ethyl parathion | Diuron** | |
| Carbofuran | Norflurazon** | Fonofos | DSMN ⁵ | |
| Diazinon | Oryzalin | Malathion | Hexazinone | |
| Dimethenamide | Prometon** | Methyl parathion | Norflurazon** | |
| Dimethoate | Simazine** | Phorate | Prometon** | |
| Diuron** | Tebuthiuron** | Piperonyl butoxide | Simazine** | |
| Ethofumesate | Thiamethoxam | Prometryn | Tebuthiuron** | |
| Fenamiphos | Thiobencarb | Propanil | | |
| Fludioxonil | Uniconazole | Triallate | | |
| Imidacloprid | | | | |

Table 2. Pesticides and degradates included in CDFA laboratory screens.

*Only used for samples collected in groundwater basins in Ventura and Riverside counties.

**Analytes are included in both screens.

¹Mefenoxam and metalaxyl are stereoisomers. The analytical method cannot differentiate the two analytes. ²ACET: deisopropyl atrazine; degradate of atrazine and simazine.

³DACT: diaminochlortriazine; degradate of simazine.

⁴DEA: deethyl atrazine; degradate of atrazine.

⁵DSMN: desmethyl norflurazon; degradate of norflurazon.

All well water samples collected in this study from the six groundwater basins noted in Table 1 were analyzed for DCPA, MTP, and TPA using method EMON-SM-05-040. Groundwater samples collected from two basins located in Riverside and Ventura counties were additionally analyzed using methods EMON-SM-62.9 (Triazine Screen) (CDFA, 2009; Fattah, 2008) and EMON-SM-05-032 (Multi-Analyte Screen) (CDFA, 2013; Aggarwal, 2016). A complete list of the Als and degradation products in the DCPA, Triazine, and Multi-Analyte screens is presented in Table 2. The Triazine Screen analyzes for six of the seven restricted-use Als on the Groundwater Protection List (Title 3 of the California Code of Regulations [CCR], section 6800[a]); the major degradation products of atrazine, simazine, and norflurazon (i.e., ACET, DACT, DEA, and DSMN); and the Als hexazinone and tebuthiuron (i.e., two Als in section 6800[b] of the Groundwater

Protection List: Als with the potential to leach to groundwater). The Multi-Analyte Screen analyzes for 44 Als, including six Als from the 6800(a) list and 29 Als from the 6800(b) list (Table 2).

Quality Assurance and Quality Control

CDFA's CAC analyzed continuing quality control samples with every set of samples to assess lab precision. The procedures for continuing quality control (QC) measures are specified in SOP QAQC001.01 (Peoples, 2019) and were implemented in Study 300 despite this study predating the official update of that SOP. During sample analysis for each extraction set (i.e., a group of samples extracted and processed as a batch), the laboratory simultaneously analyzed a lab matrix-blank and a continuing QC matrix-spike. The lab matrix-blank is a sample of analyte-free groundwater collected from a well in the Sierra foothills. The continuing QC matrix-spike consists of the same source of analyte-free groundwater fortified (spiked) with all analytes on each screen. The continuing QC matrix-spike results were evaluated by laboratory chemists, CDFA's CAC Quality Assurance Program, and the Environmental Monitoring Branch (EM) Quality Assurance (QA) Officer to ensure analytical integrity. The evaluation includes comparing the continuing QC matrix-spike recoveries to control limits set at 3-times the standard deviation of the method validation data for each analyte fortified. Recoveries from the continuing QC were used to assess and monitor ongoing sample analysis and minor variation was expected. Additionally, the EM QA Officer submitted blind spikes to the lab disguised as field samples per SOP QAQC008.00 (Ganapathy, 2005), where the blind spike consists of the analyte-free groundwater (matrix-blank sample) fortified with the chosen analytes.

RESULTS

Sample Analysis

Laboratory-measured concentrations of DCPA, MTP, and TPA in groundwater samples from each of the 45 sampled wells are listed in Table 3 and summarized by county in Table 4. Detections in each groundwater basin are briefly described in the following sections.

| Sample Number | Sample Code ¹ | Public Lands Survey System (Meridian/Township/ Range/Section) | Location Code | Analysis Date | DCPA (ppb) | MTP (ppb) | TPA (ppb) |
|------------------|-----------------------------|--|------------------|------------------|---------------|--------------|--------------|
| 533 | Р | M15S04E22 | 27-01 | 1/20/2017 | ND | ND | 0.916 |
| 534 | BU | M15S04E22 | 27-01 | 2/7/2017 | ND | ND | 1.07 |
| 535 | FB | M15S04E22 | 27-01 | 2/7/2017 | ND | ND | ND |
| 539 | Р | M19S07E05 | 27-02 | 1/26/2017 | ND | 0.13 | 22.7 |

| Table 3. DCPA Screen sample analysis results. |
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|---|

| Sample Number | Sample Code ¹ | Public Lands Survey System (Meridian/Township/ Range/Section) | Location Code | Analysis Date | DCPA (ppb) | MTP (ppb) | TPA (ppb) |
|------------------|-----------------------------|--|------------------|------------------|---------------|--------------|--------------|
| 540 | BU | M19S07E05 | 27-02 | 2/7/2017 | ND | ND | 21.1 |
| 541 | FB | M19S07E05 | 27-02 | 2/7/2017 | ND | ND | ND |
| 518 | Р | M16S05E18 | 27-03 | 1/20/2017 | ND | ND | ND |
| 515 | Р | M18S06E09 | 27-04 | 1/20/2017 | ND | ND | ND |
| 536 | Р | M17S06E32 | 27-05 | 1/20/2017 | ND | ND | ND |
| 542 | Р | M19S06E01 | 27-06 | 1/26/2017 | ND | 0.073 | 101 |
| 543 | BU | M19S06E01 | 27-06 | 2/7/2017 | ND | 0.069 | 94.4 |
| 544 | FB | M19S06E01 | 27-06 | 2/7/2017 | ND | ND | Trace |
| 503 | Р | M18S06E23 | 27-07 | 1/20/2017 | ND | ND | ND |
| 530 | Р | M14S03E35 | 27-08 | 6/1/2017 | ND | ND | ND |
| 524 | Р | M18S06E36 | 27-09 | 6/1/2017 | Trace | ND | ND |
| 526 | FB | M18S06E36 | 27-09 | 8/30/2017 | ND | ND | ND |
| 506 | Р | M18S07E31 | 27-10 | 6/1/2017 | ND | ND | ND |
| 557 | Р | M19S07E05 | 27-11 | 6/1/2017 | ND | Trace | 12.7 |
| 559 | FB | M19S07E05 | 27-11 | 8/30/2017 | ND | ND | ND |
| 500 | Р | M19S06E01 | 27-12 | 6/1/2017 | ND | 0.056 | 38.2 |
| 501 | BU | M19S06E01 | 27-12 | 9/1/2017 | ND | ND | 57.2 |
| 502 | FB | M19S06E01 | 27-12 | 10/26/2017 | ND | ND | ND |
| 527 | Р | M15S04E16 | 27-13 | 6/1/2017 | ND | ND | ND |
| 512 | Р | M15S04E17 | 27-14 | 6/1/2017 | ND | ND | |
| 514 | FB | M15S04E17 | 27-14 | 8/30/2017 | ND | ND | ND |
| 554 | Р | M15S03E02 | 27-15 | 6/19/2017 | ND | Trace | 10.9 |
| 556 | FB | M15S03E02 | 27-15 | 8/30/2017 | ND | ND | ND |
| 584 | Р | M32S13E01 | 40-01 | 10/26/2017 | ND | ND | ND |
| 590 | Р | M32S14E18 | 40-02 | 10/26/2017 | ND | ND | ND |
| 578 | Р | S06N32W06 | 42-01 | 10/26/2017 | ND | ND | ND |
| 575 | Р | S07N33W27 | 42-02 | 10/26/2017 | ND | ND | ND |
| 569 | Р | S07N34W35 | 42-03 | 10/26/2017 | ND | ND | ND |
| 593 | Р | S10N34W18 | 42-04 | 10/26/2017 | ND | ND | 1.87 |
| 595 | FB | S10N34W18 | 42-04 | 1/3/2018 | ND | ND | ND |
| 587 | Р | S10N34W17 | 42-05 | 10/26/2017 | ND | ND | 0.521 |
| 589 | FB | S10N34W17 | 42-05 | 1/3/2018 | ND | ND | ND |
| 572 | Р | S10N35W09 | 42-06 | 10/26/2017 | ND | ND | ND |
| 566 | Р | S10N35W09 | 42-07 | 10/26/2017 | ND | ND | 10.1 |
| 568 | FB | S10N35W09 | 42-07 | 1/3/2018 | ND | ND | ND |
| 611 | Р | M32S13E12 | 40-51 | 12/8/2017 | ND | ND | Trace |
| 613 | FB | M32S13E12 | 40-51 | 1/3/2018 | ND | ND | ND |
| 614 | Р | M32S13E13 | 40-52 | 12/8/2017 | ND | ND | ND |

| Sample Number | Sample Code ¹ | Public Lands Survey System (Meridian/Township/ Range/Section) | Location Code | Analysis Date | DCPA (ppb) | MTP (ppb) | TPA (ppb) |
|------------------|-----------------------------|--|------------------|------------------|---------------|--------------|--------------|
| 602 | Р | M32S13E28 | 40-53 | 12/8/2017 | ND | ND | 0.383 |
| 604 | FB | M32S13E28 | 40-53 | 1/3/2018 | ND | ND | ND |
| 644 | Р | M32S13E32 | 40-54 | 12/8/2017 | ND | ND | 0.121 |
| 646 | FB | M32S13E32 | 40-54 | 1/3/2018 | ND | ND | ND |
| 629 | Р | S11N35W26 | 40-55 | 12/8/2017 | ND | ND | 0.147 |
| 631 | FB | S11N35W26 | 40-55 | 1/3/2018 | ND | ND | ND |
| 608 | Р | S10N35W09 | 42-61 | 12/13/2017 | ND | 0.063 | 159 |
| 610 | FB | S10N35W09 | 42-61 | 1/3/2018 | ND | ND | ND |
| 635 | Р | S10N35W23 | 42-62 | 12/13/2017 | ND | ND | 13.1 |
| 637 | FB | S10N35W23 | 42-62 | 1/3/2018 | ND | ND | ND |
| 617 | Р | S09N33W02 | 42-63 | 12/8/2017 | ND | ND | ND |
| 653 | Р | S07N35W25 | 42-64 | 12/8/2017 | ND | ND | 0.867 |
| 655 | FB | S07N35W25 | 42-64 | 1/3/2018 | ND | ND | ND |
| 632 | Р | S07N35W24 | 42-65 | 12/8/2017 | ND | ND | 0.435 |
| 634 | FB | S07N35W24 | 42-65 | 1/3/2018 | ND | ND | ND |
| 656 | Р | S09N34W08 | 42-71 | 12/8/2017 | ND | ND | ND |
| 650 | Р | S10N35W08 | 42-72 | 12/13/2017 | ND | 0.065 | 66.5 |
| 652 | FB | S10N35W08 | 42-72 | 1/3/2018 | ND | ND | ND |
| 581 | Р | S10N35W10 | 42-73 | 12/13/2017 | ND | 0.101 | 133 |
| 583 | FB | S10N35W10 | 42-73 | 1/3/2018 | ND | ND | ND |
| 647 | Р | S10N34W17 | 42-74 | 12/13/2017 | ND | ND | 15.3 |
| 649 | FB | S10N34W17 | 42-74 | 1/3/2018 | ND | ND | ND |
| 834 | Р | S07S07E01 | 33-01 | 4/10/2018 | ND | ND | ND |
| 820 | Р | S07S08E04 | 33-02 | 4/10/2018 | ND | ND | ND |
| 876 | Р | S07S08E02 | 33-03 | 4/10/2018 | ND | ND | ND |
| 764 | Р | S08S08E13 | 33-14 | 4/10/2018 | ND | ND | ND |
| 855 | Р | S08S08E02 | 33-15 | 4/10/2018 | ND | ND | ND |
| 848 | Р | S07S09E26 | 33-16 | 4/10/2018 | ND | ND | ND |
| 778 | Р | S07S08E01 | 33-17 | 4/10/2018 | ND | ND | ND |
| 736 | Р | S01N21W21 | 56-01 | 4/13/2018 | ND | ND | ND |
| 862 | Р | S01N21W02 | 56-02 | 4/13/2018 | ND | ND | 0.158 |
| 867 | FB | S01N21W02 | 56-02 | 5/23/2018 | ND | ND | ND |

¹P = primary sample, BU = backup sample, FB = field blank sample

ND = not detected below the method detection limit

Trace = positive result between the method detection limit and the reporting limit

| County | Number of Unique Wells Sampled | Number of Unique Wells with Detections | Pesticides or Degradates Detected |
|-----------------|--------------------------------------|--|-----------------------------------|
| Monterey | 13 | 5 | MTP, TPA |
| Riverside | 7 | 0 | None |
| San Luis Obispo | 7 | 3 | ТРА |
| Santa Barbara | 16 | 10 | MTP, TPA |
| Ventura | 2 | 1 | ТРА |

Table 4. Summary by county of pesticide or degradate detections above the reporting limit.

Salinas Valley Groundwater Basin

The Salinas Valley Groundwater Basin is located in Monterey County and is divided into four sub-basins, including the Eastside Aquifer Sub-basin (CDWR, 2004a) and the Forebay Aquifer Sub-basin (CDWR, 2004b) (Figure 1). GWPP collected samples at thirteen unique wells in the Salinas Valley during 2017 over the three sampling periods of January 9-12, May 22-25, and June 15 (Table 1). Six of the sampled wells (one municipal well, four agricultural wells, and one domestic well) were located in the Eastside Aquifer Sub-basin and the other seven wells (two municipal wells and five domestic wells) were located in the Forebay Aquifer Sub-basin (Figure 1). Eleven of the 13 wells were sampled once and two of the 13 wells were sampled twice for a total of 15 groundwater samples from the 13 wells. (The location codes 27-06 and 27-12 in Tables 1 and 3 and on Figure 1, refer to the same well in M19S06E01 that was sampled on two separate occasions. Similarly, location codes 27-02 and 27-11 refer to the same well in M19S07E05 that was also sampled twice. Both sampling events included replicate analysis since both the primary and back-up samples were analyzed.) No wells in the Pressure Sub-basin and Upper Valley Sub-basin were sampled in Study 300 due to an inability to acquire well-owner authorization.

Five of the 13 wells contained detections of TPA ranging in concentration from 0.916 to 101 ppb (Table 3). When GWPP collected samples on January 12, the well in M19S06E01 with location code 27-06 was found to contain a TPA concentration of 101 ppb. When that same well was resampled over four months later on May 24, the measured TPA concentration decreased to 57.2 ppb. Similarly, the well in M19S07E05 with location code 27-02 when sampled on January 10, 2017 was found to contain a TPA concentration of 22.7 ppb. When that same well was resampled on May 24, the measured TPA concentration of 22.7 ppb. The decrease in measured TPA concentration in both resampled wells between January and May is likely due to dilution of TPA levels in the groundwater by aquifer recharge from the significant amount of rainfall that occurred in the region during that sampling interval. The only wells sampled in the Salinas Valley that contained measured concentrations of MTP (0.073 and 0.13 ppb) above the reporting limit of 0.05 ppb were the two wells with the highest concentrations

of TPA (101 and 22.7 ppb) (Table 3). These two wells are located just southwest and south of the city of Greenfield, respectively (Figure 1). A trace detection of DCPA was also found in a municipal well in M18S06E36 just east of the city of Greenfield (Table 3).

Santa Maria River Valley Groundwater Basin

The Santa Maria River Valley Groundwater Basin (CDWR, 2004c) spans in the north-south direction across the east-west boundary of San Luis Obispo and Santa Barbara counties (Figure 2). GWPP staff collected samples at eighteen unique wells in the basin during 2017 over the two sampling periods of October 10-12 and November 28-30 (Table 1). Six domestic wells were located in the Arroyo Grande area (San Luis Obispo County) of the basin and the other 12 wells (two municipal wells, two agricultural wells, and eight domestic wells) were located in and around the cities of Guadalupe and Santa Maria in the Santa Barbara County portion of the basin.

Two wells located near Arroyo Grande contained detections of TPA at concentrations of 0.383 ppb (location code 40-53) and 0.121 ppb (location code 40-54) (Figure 2). Three wells west of Santa Maria contained detections of TPA in the range of 0.521 to 15.3 ppb (location codes 42-05, 42-62, and 42-74). Two of the three wells were located just east of Guadalupe and contained detections of TPA with concentrations of 133 and 159 ppb (location codes 42-73 and 42-61). The third well on the western edge of Guadalupe had a TPA concentration of 66.5 ppb (location code 42-72). These three wells contained the highest measured concentrations of TPA (133, 159, and 66.5 ppb) in the basin and were located individually in three consecutively adjacent sections spanning Guadalupe in the east to west direction (Figure 2). These three wells were also the only wells sampled in the basin that contained concentrations of MTP (0.101, 0.063, and 0.065 ppb) above the reporting limit of 0.05 ppb (Table 3).

Santa Ynez River Valley Groundwater Basin

The Santa Ynez River Valley Groundwater Basin (CDWR, 2004d) is located in Santa Barbara County (Figure 3). GWPP staff collected samples at five domestic wells located in and around the city of Lompoc in the basin either on October 9 or November 29, 2017 (Table 1). Two of five wells contained detections of TPA at concentrations of 0.867 ppb (location code 42-64) and 0.435 ppb (location code 42-65) (Figure 3). DCPA or MTP were not detected in any of the five sampled wells (Table 3).

Santa Clara River Valley Groundwater Basin

The Santa Clara River Valley Groundwater Basin (CDWR, 2004e) is located in Ventura County and is divided into several sub-basins including the Oxnard Aquifer Sub-basin (Figure 4). GWPP

staff collected a sample at a single domestic/agricultural well in the Oxnard Sub-basin on April 3, 2018 (Table 1). The sample collected from the well was analyzed for the AIs and degradation products in the DCPA, Triazine, and Multi-Analyte screens (Table 2). There were no detections of any analyte found in the groundwater sample.

Pleasant Valley Groundwater Basin

The Pleasant Valley Groundwater Basin (CDWR, 2004f) is adjacent to and east of the Oxnard Aquifer Sub-basin in Ventura County (Figure 4). GWPP staff collected a sample at one domestic well in the Pleasant Valley Groundwater Basin on April 4, 2018 (Table 1). The sample collected from the well was analyzed for the AIs and degradation products in the DCPA, Triazine, and Multi-Analyte screens (Table 2). Laboratory analysis of the sample yielded a detection of TPA with a measured concentration of 0.158 ppb (location code 56-02) (Table 3). There were no detections of any analyte on the Triazine or Multi-Analyte screens found in this groundwater sample.

Coachella Valley Groundwater Basin

The Coachella Valley Groundwater Basin (CDWR, 2004g) is located in Riverside County (Figure 5). GWPP staff collected samples at seven wells (one small public water system well and six domestic wells) in the basin between March 20-22, 2018 (Table 1). Samples collected from each well were analyzed for the AIs and degradation products in the DCPA, Triazine, and Multi-Analyte screens (Table 2). There were no detections of any analyte found in the seven sampled wells.

Quality Assurance and Quality Control

For this study, the lab matrix-blank results were all non-detects. The continuing QC and blind spike results for the analysis of DCPA, MTP, and TPA are included and summarized in this section. QC data for the analytes in the Triazine Screen and Multi-Analyte Screen are summarized in this section. QC data for all analytes are available upon request.

DCPA Screen QC Samples

The continuing QC data for the DCPA Screen is summarized in Table 5. Fifteen matrix spikes with DCPA, MTP, and TPA and two matrix spikes with TPA alone were analyzed along with 47 sets of samples with the DCPA Screen. DCPA, MTP, and TPA were all spiked at 0.2 ppb. The average recovery of DCPA, MTP, and TPA was 75.4, 91.3, and 81.4%, respectively. The associated standard deviation of the recovery of DCPA, MTP, and TPA was 15.1, 12.1, and 15.7%, respectively. All recoveries of TPA were within its control limits. Three of 15 recoveries

of DCPA were just above its upper control limit and one recovery of DCPA was below its lower control limit. One of 15 recoveries of MTP was below its lower control limit.

| Analysis Date | Analyte | Spike Level (ppb) | % Recovery | Control Limited Exceeded? |
|---------------|---------|----------------------|------------|------------------------------|
| | DCPA | 0.200 | 85.0 | Yes |
| 1/20/2017 | MTP | 0.200 | 103 | No |
| - | TPA | 0.200 | 103 | No |
| 1/26/2017 | TPA | 0.200 | 103 | No |
| | DCPA | 0.200 | 74.0 | No |
| 2/7/2017 | MTP | 0.200 | 101 | No |
| | TPA | 0.200 | 99.0 | No |
| | DCPA | 0.200 | 80.5 | No |
| 2/14/2017 | MTP | 0.200 | 106 | No |
| | TPA | 0.200 | 93.5 | No |
| | DCPA | 0.200 | 80.0 | No |
| 6/1/2017 | MTP | 0.200 | 90.5 | No |
| | TPA | 0.200 | 81.5 | No |
| | DCPA | 0.200 | 85.5 | Yes |
| 6/16/2017 | MTP | 0.200 | 94.5 | No |
| | TPA | 0.200 | 87.5 | No |
| | DCPA | 0.200 | 84.5 | No |
| 6/19/2017 | MTP | 0.200 | 89.5 | No |
| | TPA | 0.200 | 73.5 | No |
| | DCPA | 0.200 | 96.5 | Yes |
| 8/30/2017 | MTP | 0.200 | 90.5 | No |
| | TPA | 0.200 | 92.0 | No |
| | DCPA | 0.200 | 82.0 | No |
| 9/1/2017 | MTP | 0.200 | 61.0 | Yes |
| | TPA | 0.200 | 67.0 | No |
| | DCPA | 0.200 | 35.8 | Yes |
| 10/23/2017 | MTP | 0.200 | 89.5 | No |
| | TPA | 0.200 | 70.0 | No |
| | DCPA | 0.200 | 73.0 | No |
| 10/26/2017 | MTP | 0.200 | 90.0 | No |
| | TPA | 0.200 | 58.0 | No |
| | DCPA | 0.200 | 81.5 | No |
| 12/8/2017 | MTP | 0.200 | 94.0 | No |
| | TPA | 0.200 | 57.5 | No |
| 12/13/2017 | TPA | 0.200 | 92.0 | No |
| | DCPA | 0.200 | 90.0 | No |
| 1/3/2018 | MTP | 0.200 | 106 | No |
| | TPA | 0.200 | 77.0 | No |

Table 5. Continuing quality control data for the DCPA Screen.

| | DCPA | 0.200 | 60.5 | No | |
|-----------------------|------|-------|---------------|----|--|
| 4/10/2018 | MTP | 0.200 | 75.5 | No | |
| | TPA | 0.200 | 63.5 | No | |
| | DCPA | 0.200 | 66.0 | No | |
| 4/13/2018 | MTP | 0.200 | 99.0 | No | |
| | TPA | 0.200 | 97.5 | No | |
| | DCPA | 0.200 | 65.5 | No | |
| 6/1/2018 | MTP | 0.200 | 80.0 | No | |
| | TPA | 0.200 | 69.0 | No | |
| | DCPA | | 75.4% (15.1%) | | |
| Mean (SD*) | MTP | | 91.3% (12.1%) | | |
| | ТРА | | 81.4% (15.7%) | | |
| | DCPA | | 57.3 – 84.5% | | |
| Control Limits | MTP | | 73.3 – 115% | | |
| | ТРА | | 48.5 - 104% | | |

*SD: Standard deviation (values in parenthesis).

Multi-Analyte Screen QC Samples

For the Multi-Analyte Screen, continuing QC matrix-spikes were extracted and split to be analyzed along with sets of samples for both the liquid chromatography mass spectrometry (LCMS) and gas chromatography mass spectrometry (GCMS) instruments. Two matrix spikes were analyzed along with two sets of samples using LCMS for the Multi-Analyte Screen. All 29 analytes in the LCMS portion were spiked at 0.2 ppb in the QC matrix-spikes and found to be within the control limits. The recoveries ranged from 59 to 113%. One recovery of phorate (59%) was below its lower control limit. Two QC matrix-spikes were also analyzed along with two sets of samples using GCMS for the Multi-Analyte Screen. All 14 analytes were spiked at 0.1 ppb in one matrix-spike and at 0.4 ppb in the other. The recoveries ranged from 76 to 111% with all analyte recoveries within the control limits.

Triazine Screen QC Samples

Four continuing QC matrix-spikes, two in duplicate, were analyzed along with three sets of samples for the Triazine Screen. All analytes were spiked at 0.2 ppb, resulting in an average recovery for the 12 analytes ranging from 60 to 108%. Each of the continuing QC matrix-spikes had one or more analyte recoveries below the lower control limit; however, the lab was consulted and there were no detections between the minimum detection limit and the reporting limit. To save on resources, the sets were not reanalyzed. The propazine surrogate recovery was within the control limits in the continuing QC matrix-spikes, as well as in every sample analyzed for this screen.

Blind Spikes

A blind spike is a matrix-blank sample spiked by a chemist other than the chemist extracting and analyzing that screen. Six blind spikes containing DCPA, MTP, and TPA were submitted throughout the study period (Table 6). The average recovery of DCPA, MTP, and TPA was 78.9, 98.5, and 101.2%, respectively. The associated standard deviation of the recovery of DCPA, MTP, and TPA was 14.9, 28.2, and 24.5%, respectively. One recovery of TPA and one recovery of DCPA were both above their respective upper control limits. Two recoveries of MTP were above its upper control limit and one recovery of MTP was below its lower control limit.

| Sample Number | Analysis Date | Analysis Screen | Analyte | Spike Level (ppb) | Result (ppb) | Recovery (%) | Control Limit Exceeded? |
|------------------|------------------|--------------------|---------|----------------------|-----------------|-----------------|-------------------------------|
| 521 | 1/20/2017 | DCPA | DCPA | 0.200 | 0.166 | 83.0 | No |
| | | | MTP | 0.200 | 0.205 | 103 | Yes |
| | | | TPA | 0.200 | 0.255 | 128 | No |
| 509 | 6/1/2017 | DCPA | DCPA | 0.150 | 0.088 | 58.7 | No |
| | | | MTP | 0.100 | 0.074 | 74.0 | No |
| | | | TPA | 0.250 | 0.171 | 68.4 | No |
| 563 | 6/19/2017 | DCPA | DCPA | 0.150 | 0.115 | 76.7 | No |
| | | | MTP | 0.100 | 0.132 | 132 | Yes |
| | | | TPA | 0.100 | 0.094 | 94.0 | No |
| 596 | 10/26/2017 | DCPA | DCPA | 0.200 | 0.144 | 72.0 | No |
| | | | MTP | 0.300 | 0.250 | 83.3 | No |
| | | | TPA | 0.250 | 0.256 | 102 | No |
| 597 | 12/8/2017 | DCPA | DCPA | 0.100 | 0.104 | 104 | Yes |
| | | | MTP | 0.150 | 0.163 | 109 | No |
| | | | TPA | 0.300 | 0.287 | 95.7 | No |
| 890 | 4/10/2018 | DCPA | DCPA | 0.250 | 0.197 | 78.8 | No |
| | | | MTP | 0.250 | 0.164 | 65.6 | Yes |
| | | | TPA | 0.250 | 0.353 | 144 | Yes |

Table 6. Blind spike levels and recoveries.

CONCLUSIONS

This report summarized the findings of Study 300: groundwater monitoring for DCPA and its degradation products MTP and TPA. The motivation and preliminary field sampling plan for Study 300 were documented in the protocol: "Study #300: Protocol for Groundwater Monitoring of DCPA and its Degradates MTP and TPA" (Ruud, 2017). The findings of Study 300 were used to evaluate detections of MTP and TPA in groundwater as occurrences of non-point source contamination due to the legal agricultural use of DCPA in a subsequent report (Ruud, 2018). For Study 300, 45 unique water wells located in six different groundwater basins/subbasins spanning five counties were sampled from January 2017 through April 2018. Forty-three of the 45 wells were sampled once and two of the 45 wells were sampled twice for a total of 47

groundwater samples from the 45 wells. None of the sampled wells contained detections of DCPA above the reporting limit of 0.05 ppb. Five wells contained detections of MTP with concentrations ranging from 0.056 to 0.13 ppb. Nineteen wells contained detections of TPA with concentrations ranging from 0.121 to 159 ppb. In particular, one well near the city of Greenfield in the Salinas Valley contained a TPA detection of 101 ppb and three wells around the city of Guadalupe in the Santa Maria River Valley Groundwater Basin contained TPA detections of 66.5, 133, and 159 ppb. All detections of TPA were well below the health-protective drinking water level of 2,500 ppb set for DCPA, MTP, and TPA by the Office of Environmental Health Hazard Assessment (OEHHA, 2018). As required by the PCPA, GWPP will continue monitoring for MTP and TPA in high-use areas of DCPA to assess concentrations of those constituents in groundwater relative to their health-protective drinking water levels.

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Figure 1. Total DCPA use (pounds per section) from 2000 to 2010 and locations of sampled water wells in the Eastside and Forebay sub-basins of the Salinas Valley Groundwater Basin in Monterey County (CDPR, 2019a; 2019b).

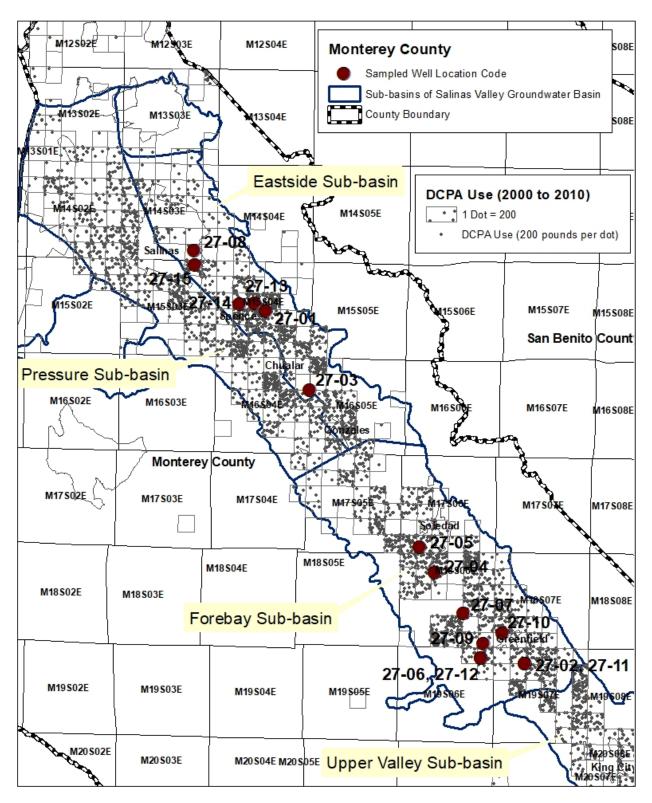


Figure 2. Total DCPA use (pounds per section) from 2000 to 2010 and locations of sampled water wells in the Santa Maria River Valley Groundwater Basin in San Luis Obispo and Santa Barbara counties (CDPR, 2019a; 2019b).

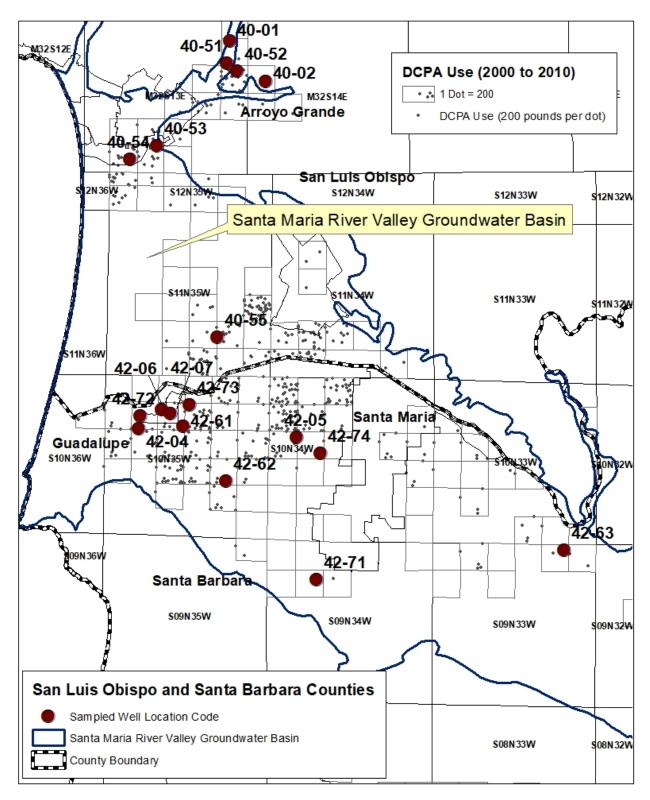


Figure 3. Total DCPA use (pounds per section) from 2000 to 2010 and locations of sampled water wells in the Santa Ynez River Valley Groundwater Basin in Santa Barbara County (CDPR, 2019a; 2019b).

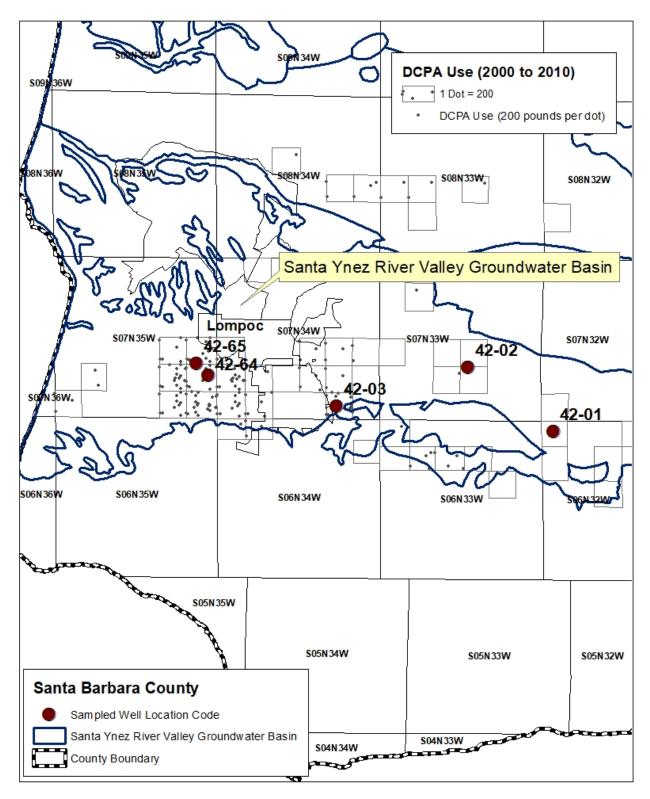


Figure 4. Total DCPA use (pounds per section) from 2000 to 2010 and locations of sampled water wells in the Pleasant Valley Groundwater Basin and Oxnard Aquifer Sub-basin in Ventura County (CDPR, 2019a; 2019b).

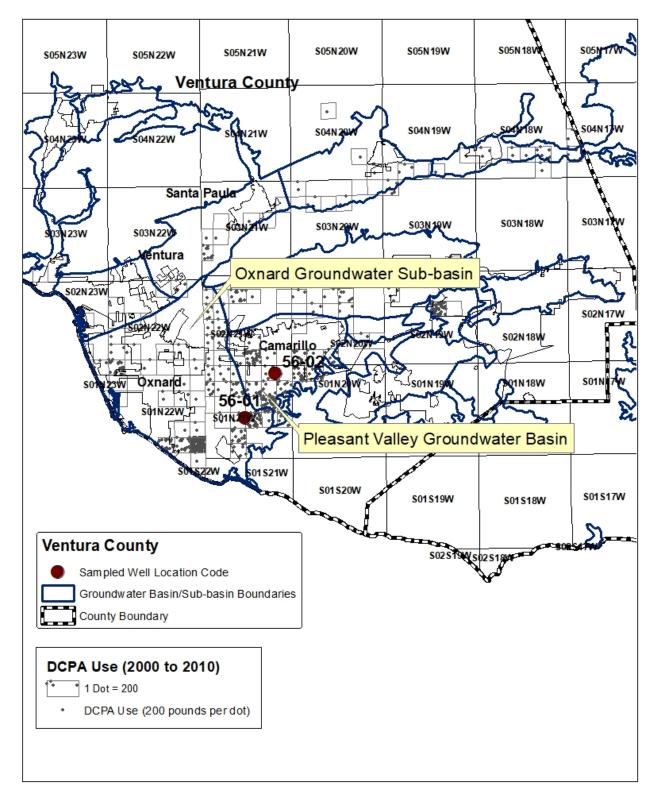


Figure 5. Total DCPA use (pounds per section) from 2000 to 2010 and locations of sampled water wells in the Coachella Valley Groundwater Basin in Riverside County (CDPR, 2019a; 2019b).

