

MVCAC NPDES Permit Coalition
2014 Annual Report
NPDES Vector Control Permit
(Order No. 2011-0002-DWQ, as
amended)

Prepared by

**Mosquito and Vector Control Association of California NPDES Permit
Coalition**



February 13, 2015

Table of Contents

| | |
|------------------------|---|
| Executive Summary..... | ES-1 |
| Section 1 | Background Information..... 1-1 |
| 1.1 | Introduction..... 1-1 |
| 1.2 | Vector Control Permit..... 1-2 |
| 1.3 | West Nile Virus Activity 1-3 |
| Section 2 | Summary of Monitoring Data..... 2-1 |
| 2.1 | Prior Monitoring Activity 2-1 |
| 2.2 | Monitoring Activity in 2014 2-1 |
| Section 3 | Best Management Practices 3-1 |
| 3.1 | Vector Control Management Practices 3-1 |
| 3.2 | BMPs Currently in Use..... 3-1 |
| 3.3 | BMP Modifications..... 3-2 |
| 3.4 | Violations..... 3-2 |
| Section 4 | References..... 4-1 |

Tables

Table 1. Members of the MVCAC NPDES Permit Coalition

Table 2. 2003-2014 West Nile Virus Activity Summary

| | |
|-----------|---|
| BMPs | Best Management Practices |
| Coalition | MVCAC NPDES Permit Coalition |
| IPM | integrated pest management |
| MAD | Mosquito Abatement District |
| MRP | Monitoring and Reporting Program |
| MVCAC | Mosquito and Vector Control Association of California |
| MVCD | Mosquito and Vector Control District |
| NPDES | National Pollutant Discharge Elimination System |
| PAP | Pesticide Application Plan |
| SWRCB | State Water Resources Control Board |
| VCD | Vector Control District |
| VCSD | Vector Control Services District |

The Statewide National Pollutant Discharge Elimination System (NPDES) Permit for Biological and Residual Pesticide Discharges to Waters of the United States from Vector Control Applications (Water Quality Order No. 2011-0002-DWQ, as amended) (hereafter called the Vector Control Permit) covers the point source discharge of biological and residual pesticides resulting from applications for vector control. The Vector Control Permit encourages dischargers to form monitoring coalitions with others doing similar applications in similar environmental settings. The Mosquito and Vector Control Association of California (MVCAC) NPDES Permit Coalition (Coalition) consists of 64 member districts and agencies.

During 2014, the Coalition did not conduct chemical monitoring or perform visual, physical, and chemical testing reportable under the Vector Control Permit. The MVCAC member agencies conducted monitoring in compliance with the Vector Control Permit's Monitoring and Reporting Program (MRP). Member agencies monitor during pesticide applications (the application rates and visually assess the area to and around where the pesticide is applied for adverse incidents, when safe and feasible), monitor after pesticide applications, and maintain records of receiving water conditions.

There was one Class III permit violation within the Coalition. Class III violations include inadvertent late submission of information required by applicable laws, regulations, or enforceable orders. The incident is described herein and further described in Santa Clara County Vector Control District's annual report.

Any changes to individual district Pesticide Application Plans (PAPs) and their associated best management practices (BMPs) were determined by individual member districts and can be found in the respective member district's annual reports as required by the Vector Control Permit.

1.1 INTRODUCTION

This is the 2014 Annual Report for the Coalition, as required under the Statewide NPDES Permit for Biological and Residual Pesticide Discharges to Waters of the United States from Vector Control Applications (Water Quality Order No. 2011-0002-DWQ, as amended).

Member districts of the Coalition submit individual annual reports consistent with the Vector Control Permit. Individual annual reports focus on larvicide and adulticide applications, site locations, and comprehensive pesticide applications logs for all larvicide and adulticide applications to Waters of the United States. Member district annual reports also address recommendations to improve PAPs and BMPs and describe permit violations, if any. Members of the Coalition are listed in Table 1.

Table 1. Members of the MVCAC NPDES Permit Coalition

| | |
|---|--|
| Alameda County MAD | Merced County MAD |
| Alameda County VCSD | Napa County MAD |
| Burney Basin MAD | Nevada County Community Development Agency |
| Butte County MVCD | Northern Salinas Valley MAD |
| City of Alturas | Northwest MVCD |
| City of Blythe | Orange County MVCD |
| City of Long Beach | Oroville MAD |
| City of Moorpark | Owens Valley MAD |
| City of Pasadena | Pine Grove MAD |
| City of San Francisco | Placer MVCD |
| Coachella Valley MVCD | Riverside County Vector Control Program |
| Colusa MAD | Sacramento - Yolo MVCD |
| Compton Creek MAD | Saddle Creek Community Services District |
| Consolidated MAD | San Benito County Agricultural Commission |
| Contra Costa MVCD | San Bernardino County |
| Delta VCD | San Diego County Department of Environmental Health – Vector Control Program |
| Durham MAD | San Gabriel Valley MVCD |
| East Side MAD | San Joaquin County MVCD |
| El Dorado County Environmental Management | San Mateo County MVCD |
| Fresno MVCD | Santa Barbara County, Mosquito and Vector Management District |
| Fresno Westside MAD | Santa Clara County VCD |
| Glenn County MVCD | Santa Cruz County MVCD |
| Greater Los Angeles County VCD | Shasta MVCD |

Table 1. Members of the MVCAC NPDES Permit Coalition

| | |
|-----------------------------------|--|
| Imperial County Vector Control | Solano County MAD |
| June Lake Public Utility District | South Fork MAD |
| Kern MVCD | Sutter-Yuba MVCD |
| Kings MAD | Tehama County MVCD |
| Lake County VCD | Tulare County MAD |
| Los Angeles County West VCD | Turlock MAD |
| Madera County MVCD | Ventura County Environmental Health Division |
| Mammoth Lakes MAD | West Side MVCD |
| Marin/Sonoma MVCD | West Valley MVCD |

Notes:

MAD = Mosquito Abatement District

MVCD = Mosquito and Vector Control District

VCD = Vector Control District

VCSD = Vector Control Services District

1.2 VECTOR CONTROL PERMIT

The Vector Control Permit (Water Quality Order No. 2011-0002-DWQ; General Permit No. CAG 990004) became effective on March 1, 2011. This general permit was later amended by the following water quality orders:

- Order 2012-0003-DWQ on April 3, 2012,
- Order 2014-00038-EXEC on March 12, 2014, and
- Order 2014-0106-DWQ on July 2, 2014.

The Vector Control Permit covers the point source discharge of biological and residual pesticides resulting from direct and spray applications for vector control. Under this general permit, entities involved in the application of vector control pesticides that result in a discharge of biological and residual pesticides to waters of the United States are to comply with the permit's MRP. The Vector Control permit encourages dischargers to form monitoring coalitions with others doing similar applications in similar environmental settings. The MVCAC Coalition consists of 64 member districts and agencies.

The original order (Order No. 2011-0002-DWQ) required member agencies to prepare PAPs that included a list of all pesticide products to be used, among other items. This order also required the permittee or Coalition to conduct visual, physical, and chemical monitoring. The monitoring included the chemical analysis of representative samples collected prior to pesticide applications (background samples), shortly after the time of application, and post-application.

To increase the likelihood that vector resistance to control programs is prevented, the California Department of Public Health and MVCAC requested coverage for additional pesticide products. In response to their request, product formulations were added to Attachments E and F of the

permit when Order No. 2011-0002-DWQ was amended in April 2012 by Order No. 2012-0003-DWQ. Most of the additional product formulations contained the same active ingredients that were already authorized for use pursuant to Order No. 2011-0002-DWQ.

Order 2014-00038-EXEC amended the MRP and replaced the visual, physical, and chemical monitoring requirements with reporting of visual observations, monitoring and reporting of pesticide application rates, and reporting of non-compliant applications.

Order 2014-0106-DWQ amended the permit and does the following: (1) adds to the permit all larvicides and adulticides that are currently registered by DPR and new larvicides and adulticides that will be registered by DPR using the same active ingredients; (2) includes additional receiving water limitations and receiving water monitoring triggers for newly added active ingredients; and (3) includes a provision for reopening the permit to include new active ingredients that DPR registers for vector control.

In July 2014, the Coalition submitted a joint PAP amendment to the State Water Resources Control Board (SWRCB) (MVCAC 2014). The PAP amendment was submitted to revise member agencies' respective PAPs to include all larvicides and adulticides covered by the Vector Control Permit, as modified by Order 2014-0106-DWQ on July 2, 2014. In August 2014, the SWRCB issued a notice of applicability for the revised PAP, indicated that the MVCAC member districts satisfied the conditions of the Vector Control Permit, and concluded that the revised PAP was complete.

1.3 WEST NILE VIRUS ACTIVITY

Vector control districts protect public health by controlling mosquitoes that spread disease. West Nile virus is a mosquito-borne disease that is common in Africa, west Asia, the Middle East, and more recently, North America. Human infection with West Nile virus may result in serious illness. It first appeared in California in 2002, and in 2004, West Nile virus activity was observed in all 58 counties.

ArboNET¹ is the Center for Disease Control's internet-based passive surveillance system for arboviral diseases (including West Nile virus) in the United States. Data are uploaded to ArboNET on a weekly basis by state and local health departments. In 2014, a total of 787 human cases and 29 fatalities in California were reported to ArboNET. This is higher than the 368 human cases of West Nile virus and the 15 fatalities reported in 2013.

California-specific information can also be found on California's West Nile Virus website (see Table 2).² The California Department of Public Health, UC Davis Center for Vectorborne Diseases, the California Department of Food and Agriculture, and MVCAC contribute data and maintain California's West Nile Virus website. Table 2 shows that incidents increased in 2014 compared to the prior 8 years.³

¹ <http://www.cdc.gov/westnile/index.html>

² <http://westnile.ca.gov/>

³ The number of incidents reported on westnile.ca.gov showed 798 human incidents which is slightly more than those reported on ArboNET.

Table 2. 2003-2014 West Nile Virus Activity Summary

| Element | 2003 | 2004 | 2005 | 2006 | 2007 | 2008 | 2009 | 2010 | 2011 | 2012 | 2013 | 2014 |
|---------------------|--------------------|----------|----------|---------|----------|----------|---------|---------|---------|----------|----------|----------|
| Human cases (fatal) | 3 ^a (0) | 779 (29) | 880 (19) | 278 (7) | 380 (21) | 445 (15) | 112 (4) | 111 (6) | 158 (9) | 479 (20) | 379 (15) | 798 (29) |
| Horses | 1 ^b | 540 | 456 | 58 | 28 | 32 | 18 | 19 | 15 | 22 | 13 | NA |
| Dead birds | 96 | 3,232 | 3,046 | 1,446 | 1,396 | 2,569 | 515 | 416 | 688 | 1,644 | 1,251 | 2,442 |
| Mosquito samples | 32 | 1,136 | 1,242 | 832 | 1,007 | 2,003 | 1,063 | 1,305 | 2,087 | 2849 | 2,528 | 3,340 |
| Sentinel chickens | 70 | 809 | 1,053 | 640 | 510 | 585 | 443 | 281 | 391 | 540 | 485 | 443 |
| Squirrels | - | 49 | 48 | 32 | 26 | 32 | 10 | 24 | 24 | 23 | 8 | NA |

^a There were 20 imported human cases.

^b There were 3 imported horse cases.

NA = not available

Source: <http://westnile.ca.gov>

2.1 PRIOR MONITORING ACTIVITY

Historically, the Vector Control Permit required monitoring including visual, physical and chemical. Reports of prior monitoring activity can be found on the SWRCB's website at the following urls:

http://www.waterboards.ca.gov/water_issues/programs/npdes/pesticides/docs/vectorcontrol/mvcac_2012.pdf

http://www.waterboards.ca.gov/water_issues/programs/npdes/pesticides/docs/vectorcontrol/mvcac_2013.pdf

The physical and chemical monitoring results contained in the 2011-2012 report indicated that the active ingredient being sampled was rarely present in the waterway and/or the presence of the material in the waterway was of extremely short duration. The report concluded that there did not seem to be any significant long-term impact to the beneficial uses of the waters.

On May 22, 2013, MVCAC requested a reduction of the monitoring requirements and the SWRCB's consideration of requirements that complement the vector control districts' public safety mission and that do not interfere with the timing of their critical pesticide applications. The 2014-0106-DWQ Order replaced the visual, physical, and chemical monitoring with reporting of visual observations, monitoring and reporting of application rates, and reporting of non-compliant applications.

2.2 MONITORING ACTIVITY IN 2014

During 2014, the Coalition did not conduct chemical monitoring or perform visual, physical, and chemical testing reportable under the Vector Control Permit. MVCAC member agencies completed pesticide application logs and conducted monitoring in compliance with the Vector Control Permit's MRP. Member agencies monitor during pesticide applications (the application rates and visually assess the area to and around where the pesticide is applied for adverse incidents, when safe and feasible), monitor after pesticide applications, and maintain records of receiving water conditions.

3.1 VECTOR CONTROL MANAGEMENT PRACTICES

MVCAC member agencies employ integrated pest management (IPM) and thus use of adulticides to control adult mosquitos is the method of control when it becomes necessary, such as in the event of a disease outbreak (documented presence of infectious virus in active host-seeking adult mosquitoes), or lack of access to larval sources leading to the emergence of large numbers of adult mosquitoes. First and foremost, MVCAC promotes education to prevent the formation of mosquito habitat. To that end, MVCAC encourages all public agencies to incorporate the California Department of Public Health BMPs in their planning and permitting documents and requirements. More than any other collective action that MVCAC could take; educating landowners about the simple, low-cost ways to prevent mosquito breeding habitats will have the greatest effects on disease prevention. This step alone has the greatest potential to reduce the need for adulticides. While MVCAC presses for introduction of these education and information tools throughout the state, its second level of protection is the use of physical and biological control tools to reduce the potential formation of mosquito breeding sites. Such steps include the use of water management practices, the removal of vegetation, and the introduction of predacious organisms such as mosquito fish to control the mosquito populations in their aquatic stage. Many districts conduct surveillance to ensure that they are targeting only those mosquitoes with the greatest impact to public health and this surveillance component helps drive control efforts. The third and fourth steps in the IPM process are chemical control of mosquitoes using larvicides and adulticides.

3.2 BMPS CURRENTLY IN USE

Member districts of MVCAC implement the BMPs provided in their respective PAPs in meeting the requirements of the Vector Control Permit. MVCAC member agencies follow an IPM approach that strives to efficaciously use pesticides and minimize their impact on the environment while protecting public health. Each member agency determines what vector management methods are appropriate in their district, and follows response plans that use surveillance tools to determine the extent of the problem and guide treatment decisions, with an emphasis on source reduction and control of mosquitoes in their immature stages. The least toxic materials available for control of the larval stages, focusing on bacterial larvicides, growth regulators and surface films are used rather than organophosphates or pyrethroids. Control of adult mosquitoes may become necessary under some circumstances, such as in the event of a disease outbreak (documented presence of infectious virus in birds, human population or active host-seeking adult mosquitoes), or lack of access to larval sources leading to the emergence of large numbers of biting adult mosquitoes. Organophosphate insecticides (naled and malathion) are used in rotation with pyrethrins or pyrethroids to avoid the development of resistance. The active ingredients currently used for control of adult mosquitoes have been deliberately selected for lack of persistence and minimal effects on non-target organisms when applied at label rates for ultra-low volume mosquito control. All BMPs included in the product labels are followed and include such measures as restrictions in certain land uses and weather (i.e., wind speed) parameters. Additional information about specific BMPs by region can be found in member agency's PAPs.

3.3 BMP MODIFICATIONS

Modifications to BMPs are handled by individual member districts on a district-by-district basis. Any modifications to BMPs can be found in respective member districts annual reports prepared as required by the Vector Control Permit. Pesticide application logs and site locations of the applications are also reported by the member districts in the district's annual report.

3.4 VIOLATIONS

Individual member districts would report violations of the Vector Control Permit in the district's annual report. One Class III violation was reported to the Coalition (described below). Class III violations pose only a minor threat, if any, to water quality and have little or no known potential for causing a detrimental impact on human health and the environment. Class III violations include inadvertent late submission of information required by applicable laws, regulations, or enforceable orders.

The Santa Clara County Vector Control District's original PAP referenced the permitted adulticide and larvicide products listed in the Vector Control Permit and attached the then-current pages of the permit specifying these formulations (Attachment E and F). The pesticide formulation Zenivex E4 was added to Attachment E of the Vector Control Permit in April 2012. The revised page was not replaced in the PAP. The Santa Clara County Vector Control District's Annual Report for 2013 indicates that they applied Zenivex E4 in several locations in July, August, and September of 2013. This was considered a violation of permit condition VIII.C.3, which requires that each member agency list pesticide products or types expected to be used and if known, their degradation by-products, the method in which they are applied, and if applicable, the adjuvants and surfactants used. The incident is described further in Santa Clara County Vector Control District's annual report.

The Vector Control Permit was later amended on July 2, 2014 to cover active ingredients that are currently registered by DPR for vector control, rather than specific product lists. The Coalition submitted a joint PAP amendment to revise the member agencies' respective PAPs to include all larvicides and adulticides covered by the Vector Control Permit, as modified by the July 2014 permit amendment. In August 2014, the SWRCB issued a notice of applicability for the revised PAP, implementing regulatory coverage under the permit.

MVCAC 2014. Mosquito and Vector Control Association of California. Pesticide Application Plan (PAP) Amendment. July 16.

SWRCB 2014. State Water Resources Control Board Order WQ 2014-0106-DWQ Amending State Water Resources Control Board Water Quality Order 2011-0002-DWQ (As Amended by Orders 2012-0003-DWQ and 2014-0038-EXEC), General Permit No. CAG 990004 Statewide National Pollutant Discharge Elimination System (NPDES) Permit for Biological and Residual Pesticide Discharges to Waters of the United States from Vector Control Applications. July 2.