



Californians For
Pesticide Reform



LATINO ISSUES FORUM

CENTER ON
RACE,
POVERTY
& THE
ENVIRONMENT

March 8, 2007

Ms. Pam Wofford
Department of Pesticide Regulation
1001 I Street, P.O. Box 4015
Sacramento, CA 95812

CC: Mary-Ann Warner, Director

Re: Request for improved water quality testing in the Parlier EJ Pilot Project

Dear Ms. Wofford:

On behalf of the Community Water Center, Californians for Pesticide Reform, Latino Issues Forum, Center on Race, Poverty & the Environment, Clean Water Action, the Environmental Justice Coalition for Water, and El Comité para el Bienestar de Earlimart, we respectfully request that the Parlier Environmental Justice Pilot Project include further and more comprehensive water quality testing to ensure that the study adequately characterizes and evaluates exposure to pesticides in water, as well as overall cumulative pesticide exposure.

The Department of Pesticide Regulation (DPR)'s Environmental Justice Pilot Project in Parlier was designed to answer three primary questions:

- Are residents of Parlier exposed to pesticides,
- If so, which pesticides and in what amounts, and
- Do measured levels exceed levels of concern to human health, particularly children.¹

The current project fails to achieve its purpose by not including adequate monitoring and analysis of pesticides in water. While the project currently focuses on air samples, monitoring of pesticides in water is necessary to identify the pesticides that Parlier residents are exposed to, the level of pesticide exposure, and the cumulative level of exposures through different media, such as air and water.

Currently the project is supposed to include "ground water samples from the five municipal wells that supply drinking water for the city of Parlier."² Specifically, the plan

¹ http://www.cdpr.ca.gov/docs/envjust/pilot_proj/faq.htm

² http://www.cdpr.ca.gov/docs/envjust/pilot_proj/faq.htm

states that "the samples will be collected once or twice during the 52-week monitoring study. They will be analyzed for 12 pesticides and breakdown products that have been found in groundwater elsewhere in California."³

Both the first and second *Progress Reports* issued on the results stated the following as the entirety of the pesticide water monitoring information and analysis,

Pesticide Water Monitoring – Three municipal wells currently provide all of the drinking water for Parlier. DPR's samples from these wells contained no detectable concentrations of eight pesticides and four breakdown products found in ground water in other areas (atrazine, bromacil, diuron, hexazinone, metribuzin, norflurazon, prometon, simazine, desmethyl norflurazon, deethyl atrazine, deisopropyl atrazine, and diamino chlorotriazine).⁴

The pesticide in water monitoring portion of this study is inadequate because it fails to monitor for all pesticides applied in the area that have been identified as potential groundwater contaminants, and because it fails to sample a sufficient number and type of drinking water wells.

I. The DPR should monitor for all pesticides applied in the area that have been identified as potential groundwater contaminants in the California Code of Regulations Section 8600(b) as part of the Parlier Pilot Project.

The eight pesticides and four breakdown products which were tested for are far fewer than the total number of pesticide compounds that may be present in local groundwater. As the DPR's own annual well inventories prove year after year, many of the pesticides listed on the list of potential groundwater contaminants often are found by DPR itself in drinking water wells sampled in Fresno and Tulare Counties.⁵ Therefore, the current monitoring list is drastically inadequate to identify potential pesticide exposure in water.

The project should, instead include testing for all pesticides that have been identified as potential groundwater contaminants in the California Code of Regulations Section 8600(b), which have ever been applied in the area. We have attached to this letter as "Appendix A" a list of those pesticides that have been applied in Fresno County in 2005 alone that have been identified as potential groundwater contaminants. In addition, the Department of Pesticide Regulation should identify and test for any other potential groundwater contaminants that have been applied at any time in the past, as they may only now be reaching groundwater that is used as a source of Parlier's drinking water.

³ http://www.cdpr.ca.gov/docs/envjust/pilot_proj/faq.htm

⁴ First Progress Report is available at http://www.cdpr.ca.gov/docs/envjust/pilot_proj/parlier_progrpt.pdf and the Second Progress Reports is available at http://www.cdpr.ca.gov/docs/envjust/pilot_proj/interim/narrative.pdf.

⁵ Well Inventory Reports are available at <http://www.cdpr.ca.gov/docs/wellinv/wirmain.htm>.

II. The DPR should monitor all public drinking water wells in the Parlier area, as well as voluntary private drinking water wells in the community.

The DPR should monitor all public drinking water wells that may supply water to community residents, as well as solicit volunteers from those residents with private drinking water wells in the community. Standby public wells are often used in emergencies and are an important variable to consider for resident pesticide exposure. Additionally, private wells, which are used by some residents of the community often draw from shallower aquifers that may have higher levels of pesticides. All these wells should be tested and the results provided to the public as part of the Pilot Project's monitoring and reporting.

Conclusion

The DPR has one pilot project in which it is supposed to study the direct and cumulative levels of exposure for residents of the pesticides it regulates. Unfortunately, the study has almost entirely focused on air contamination thus far. Currently the Parlier Pilot Project only sampled for eight pesticides and four breakdown products in Parlier's public wells. The DPR should conduct groundwater sampling for all pesticides applied in the area that are listed as potential groundwater contaminants, and should sample additional drinking water wells in the community.

Thank you for your consideration of these requests. We look forward to working with DPR to ensure that all communities are protected from pesticide contamination of our precious drinking water sources and that the DPR's EJ Pilot Project effectively achieves its goals of evaluating pesticide exposure. Should you have any questions regarding this request, you can contact Laurel Firestone at (559) 733-0219 or laurel.firestone@communitywatercenter.org.

Sincerely,



Laurel Firestone & Susana De Anda
Community Water Center

Teresa De Anda
El Comité para el Bienestar de Earlimart

Tracy Brieger
Californians for Pesticide Reform

Chione Flegal & Stephanie Camoroda
Latino Issues Forum

Gustavo Aguirre
Center on Race Poverty & the Environment

Andria Ventura
Clean Water Action

Amy Vanderwalker
Environmental Justice Coalition for Water

Ms. Elena Ochoa Pardo

Vecinos Unidos.

~~*Asociación Vecinos Unidos*~~
coalición A S U A
Bertha Diaz

VE SINOS UNIDOS - CAGUA

Vanessa Moody
Vecinos Unidos (A.G.U.A.)

Appendix A

Potential Groundwater Contaminants

The following are pesticides applied in Fresno County in 2005 alone, which have been classified as potential groundwater contaminants by CA DPR.⁶ These are all currently unregulated and should be tested for in the drinking water wells in the Parlier area as part of the Environmental Justice Pilot Project in that community.

1. Acephate
2. Acetamiprid
3. Acrolein
4. Alachlor (The US EPA has set a Maximum Contaminant Level (MCL) for Alachlor in public drinking water supplies at 0.002mg/L in 1991.)
5. Aldicarb
6. Azinphos-Methyl
7. Azoxystrobin
8. Bensulfuron Methyl
9. Bensulide
10. Bifenazate
11. Butylate
12. Cacodylic Acid
13. Calcium Acid Methanearsonate
14. Carbaryl
15. Carbofuran (The CA DHS has set a MCL for Carbofuran in public drinking water supplies at 0.018mg/L in 1990.)
16. Chloropicrin
17. Chlorothalonil
18. Chlorsulfuron
19. Clethodim
20. Cycloate
21. Cyprodinil
22. 2, 4-D (The US EPA set a MCL for 2, 4-D in public drinking water supplies at 0.07mg/L as of 1991.)
23. 2, 4-D, Butoxyethanol Ester
24. 2, 4-d, Dimethylamine Salt
25. 2, 4-D, 2-Ethylhexyl Ester
26. 2,4-D, Isooctyl Ester
27. Dazomet
28. 4(2, 4-db), Dimethylamine Salt
29. Diazinon
30. Dicamba
31. Dicamba, Dymethylamine Salt
32. Dichlobenil

⁶ Potential Groundwater Contaminants are defined in Section 6800(b) of the California Code of Regulations.

33. Dicloran
34. Diiflufenzopyr, Sodium Salt
35. Dimethoate
36. Dimethomorph
37. Diquat Dibromide (The US EPA has set a MCL for Diquat in public drinking water supplies at 0.02mg/L in 1992.)
38. Disulfoton
39. Dithiopyr
40. Emamectin Benzoate
41. EPTC
42. Ethofumesate
43. Fenamiphos
44. Fenarimol
45. Fenhexamid
46. Fipronil
47. Fludioxonil
48. Flutolanil
49. Formetanate Hydrochloride
50. Fosetyl-AI
51. Glusosinate-Ammonium
52. Glyphosate, Isopropylamine Salt (The CA DHS has set a MCL for Glyphosate for public drinking water supplies at 0.7mg/L in 1990.)
53. Hexazinone
54. Imazomox, Ammonium Salt
55. Imazethapyr
56. Imidacloprid
57. Iprodione
58. Isoxaben
59. Kresoxim-Methyl
60. Linuron
61. Malathion
62. MCPA, Dimethylamine Salt
63. MCPP
64. MCPP, Dimethylamine Salt
65. Mecoprop-p
66. Mepiquat Chloride
67. Mesosulfuren-Methyl
68. Metaxyl
69. Metalddehyde
70. Methamidophos
71. Methidathion
72. Methomyl
73. Methoxyfenozide
74. Methyl Parathion
75. S-Metolachlor
76. Metribuzin

77. Molinate (The CA DHS set the MCL for Molinate at 0.02mg/L for public drinking water supplies in 1989.)
78. Msma
79. Napropamide
80. Nicosulfuron
81. Oryzalin
82. Oxydemeton-Methyl
83. Paraquat Dichloride
84. Parathion
85. Pebulate
86. Phenmedipham
87. Phorate
88. Phosmet
89. Piperonyl Butoxide
90. Profenofos
91. Prohexadione Calcium
92. Prometryn
93. Propanil
94. Propiconazole
95. Propyzamide
96. Pymetrozine
97. Pyraclostrobin
98. Pyrazon
99. Pyriithiobac-Sodium
100. Rimsulfuron
101. Sethoxydim
102. Siduron
103. Sulfometuron-Methyl
104. Tebuconazole
105. Tebufenozide
106. Tebuthiron
107. Thiamethoxam
108. Thiazopyr
109. Thiobencarb (The CA DHS set a MCL for Thiobencarb in public drinking water supplies of 0.07mg/L and a secondary MCL of 0.001mg/L in 1989.)
110. Thiophanate-Methyl
111. Tradimefon
112. Triclopyr Butoxyethyl Ester
113. Triclopyr, Triethylamine Salt
114. Triflumizole
115. Triflurosulfuron-Methyl
116. Vinclozolin