

## MEMO

To: Delta RMP Technical Advisory Committee

From: Matthew Heberger, SFEI

Date: July 19, 2019

Re: Wording in pesticides interpretive report by Deltares

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At our meeting with the scientists from Deltares on Monday, there was a debate about the most appropriate wording for the numeric values used to evaluate whether chemicals in the environment are toxic. Should we call these thresholds, benchmarks, triggers, screening levels...? We agreed to draft text for inclusion in the report and provide it to the contractor, and to discuss it at the July 19 TAC meeting. Here is draft the draft language provided by Debra Denton and Danny McClure:

“Toxicity threshold values are needed to interpret monitoring data with respect to whether there is potential risk to aquatic life from pesticides. In this report “threshold values” are concentrations of a pesticide above which there is concern that the pesticides may be causing harm to aquatic life. While intended to be conservative, the toxicity thresholds used in this document may not be always be protective in the sense these are not State water quality objectives and are based only on the available ecotoxicity data.”

Steering Committee co-chair Debbie Webster suggests replacing the word "threshold" with "screening level" or "screening value." She wrote that, the "proposed language does not alleviate this concern regarding the definition of “threshold” and I think we need to use a different word. CVCWA recommended the use of screening levels. “Screening levels” and “screening values” are common terms in risk assessment and is used by USEPA and others.

Given the above (disagreement within the TAC and regulatory implications), this is an issue that requires input from the Delta RMP Steering Committee. While discussion at the TAC meeting is appropriate, this is not an issue where the decision should be made by the TAC.

For what it is worth, here is what SFEI scientists wrote in a recent draft report on CECs in the Bay:

“In order to determine whether contaminants were present in concentrations that are ecologically relevant, i.e., those which may cause harm to aquatic biota, we compared observed concentrations with thresholds for aquatic toxicity gathered from several sources. The presence of a compound above a threshold is not necessarily evidence that harm is taking place, but rather it is a first step in a process for interpreting the data and evaluating relative ecological risk.”

*In Current-Use Pesticides and Wastewater Contaminants in San Francisco Bay Margin Sediment and Water.* San Francisco Estuary Institute, Richmond, California, in review.