Quantifying Variability & Uncertainty in Phosphorus TMDL's for Lakes

Reservoirs Too!

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Quantifying Variability & Uncertainty Benefits

Estimates Probability of Achieving Goal

Provides Rational Basis for MOS

Helps to Define Lake Goal Numerical Value "Target" or "Limit"? Spatial & Temporal Averaging Compliance Rate (% of Years Achieving Goal)

Identifies Important Sources of Uncertainty

Provides Incentive for Continued Data Collection & Modeling More Data --?-> Lower MOS --?--> Higher Load Alloc

Quantifying Variability & Uncertainty Difficulties

Limited Guidance Provided in TMDL Regulations

Frequency Concepts Rarely Built into WQ Standards

Load Allocations Sensitive to Assumptions:

Compliance Rate (e.g., % of yrs <= target)

Confidence Level (~probability of success)

Uncertainty/Variability Costs (MOS) Can Be Large

Can Backfire & Retard Restoration Efforts

Technical Complexity

Uncertainty Estimates are Uncertain



Algal Bloom Frequency vs. Total Phosphorus

Bloom Frequencies from daily samples at Vadnais Intake & Pleasant Gatehouse Total Phosphorus concentrations measured in Lake Epilimnion (0-6 m) April-September Means for Each Year







Derivation of Phosphorus Target for Upper Klamath Lake for Compliance with pH Standard







Alternative Interpretations of a 20 ppb Lake P Goal

Year

Case 2: Yearly Mean < 20 ppb in 90% of Years Long-Term Mean = 15.5 ppb TMDL = 77 kg/yr



Year

TMDL Equations Long-Term-Average Mass Balances

Watershed Mass Balance:

| TMDL = | SLAS - | SWLAS + | Background | + MOS |
|--------------------------------|----------------------|--------------------|---------------------------------|----------------------------|
| Total Maximum Daily Load | Non-Point Sources | Point Sources | Natural or Unregulated | Margin of Safety |
| Ţ | Anthropogenic | < Discharge Permit | Undev. Watershed Atmospheric | uncertainty variability |

<--- Expected Long-Term-Average Load to Lake --->

Lake Mass Balance:

 $TMDL = Q_S P^* + U P^*$

Input Flushing Net Retention

Consideration of Point-Source Variability



Month

Arith Mean10Long-Term Average Load Used in TMDL Mass BalancePermit Limit14Permit Value not to be Exceeded in >5% of MonthsModel: Log-Normal Distribution with CV =0.2

MOS Alternatives

Conservative Water Quality Criteria/Standard

Conservative Phosphorus Goal

Conservative Modeling Assumptions

Conservative Effluent Limits / Discharge Permits

Conservative Facility Designs

Conservative Growth Projections

Shell Game

Modeling Variability & Uncertainty Stochastic Approach

Predicted Long-Term-Average Lake P Conc:

$$P_{M} = L_{M} / (U + Q_{S})$$

Accounting for Uncertainty:

$$P_{MU} = P_{M} \exp(d_{u})$$

$$d_{u} = random \ error \ term, \ mean = 0, \ std \ dev = s_{u}$$

$$s_{u} \sim 0.1 - 0.5$$

Accounting for Uncertainty & Variability:

 $P_{MUY} = P_M \exp(d_u + d_y)$ $d_y = random yr-to-yr variation, mean = 0, std dev = s_y$ $s_y \sim 0.1 - 0.3$

TMDL Calculation Spreadsheet

| <u>Variable</u> | <u>Units</u> | <u>Value</u> | Equation | Notes |
|--------------------------------|-----------------------|--------------|------------------------------|---|
| Input Values: | | | | |
| Existing Load | mg/m²-yr | 1000 | Lo | long-term-average load |
| Net Settling Rate | m/yr | 10 | U | from model calibration |
| Water Load | m/yr | 10 | Qs | outflow / surface area |
| Target Lake P | ppb | 25 | P* | for compliance with wq standards |
| Confidence Level | % | 90% | p1 | = 100 - max risk of not achieving objective |
| Compliance Frequency | % | 80% | p2 | expected percent of years achieving target |
| Model Error Std Dev | - | 0.3 | Su | accounts for modelling uncertainty |
| Year-to-Year Std Dev | - | 0.1 | Sy | accounts for temporal variability in lake p |
| Output Values: | | | | |
| Normal Deviate (p1) | | 1.282 | Zu = Normal (1-p1) | normal deviate with tail probability 1-p1 |
| Uncertainty Factor | | 0.681 | Fu = exp(- Zu Su) | |
| Normal Deviate (p2) | | 0.842 | Zy = Normal (1-p2) | normal deviate with tail probability 1-p2 |
| Variability Factor | | 0.919 | Fy = exp(-Zy Sy) | |
| MOU Fraction | | 0.8 | f = (1 - Fu) / (2 - Fu - Fy) | fraction of MOS assigned to MOU |
| TMDL | mg/m²-yr | 500 | TMDL = (Qs + U) P* | |
| Allocated Load | mg/m ² -yr | 313 | La = TMDL Fu Fy | long-term-average allocated load |
| Margin of Safety | mg/m ² -yr | 187 | MOS = TMDL - La | or $MOS = MOU + MOV$ |
| Margin of Uncertainty | mg/m ² -yr | 149 | MOU = f MOS | portion of MOS attributed to uncertainty |
| Margin of Variability | mg/m²-yr | 38 | MOV = MOS - MOU | portion of MOS attributed to variability |
| Uncertainty Cost | | 30% | MOU / TMDL | MOU as fraction of TMDL |
| Variability Cost | | 8% | MOV / TMDL | MOV as fraction of TMDL |
| Required Load Reduction | 1 | 69% | 1 - La / Lo | |



TMDL Sensitivity to Compliance Frequency & Confidence Level

| Lake P Target | LT-Avg | <u>LT-Avg</u> | <u>10-Yr Max</u> | <u>10-Yr Max</u> |
|------------------------|--------|---------------|------------------|------------------|
| Uncertainty Considered | No | Yes | No | Yes |
| Variability Considered | No | No | Yes | Yes |
| Confidence Level>MOU | 50% | 90% | 50% | 90% |
| Compliance Freq> MOV | 50% | 50% | 90% | 90% |
| Model Error Std Dev | 0.4 | 0.4 | 0.4 | 0.4 |
| Temporal Std Dev | 0.2 | 0.2 | 0.2 | 0.2 |
| Allocated LTA Load | 500 | 299 | 387 | 232 |
| Load Reduction | 29% | 57% | 45% | 67% |

TMDL Sensitivity to Model Uncertainty



| | Increasing Model Uncertainty> | | | | |
|---------------------|-------------------------------|-----|-----|-----|--|
| Model Error Std Dev | 0.0 | 0.1 | 0.2 | 0.4 | |
| Temporal Std Dev | 0.2 | 0.2 | 0.2 | 0.2 | |
| Allocated LTA Load | 387 | 340 | 299 | 232 | |
| Load Reduction | 45% | 51% | 57% | 67% | |
| Uncertainty Cost | 0% | 11% | 20% | 34% | |

TMDL Allocations for Confidence Level = 90%, Compliance Freq = 90%





Figure 29 Confidence Intervals for TMDL's Compared with Historical Phosphorus Loads



Historical Loads -----> W

Water-Column Models ----->

Sediment & Water Column Models ----->

Iterative TMDL Process



Phased Approach to T M D L Implementation



| Confidence Level | 50% | 90% | | 90% |
|---------------------|-----|------------|-----------------------|-----|
| Compliance Freq | 50% | 90% | Uncertainty Reduction | 90% |
| Model Error Std Dev | 0.4 | 0.4 — | | 0.1 |
| Temporal Std Dev | 0.2 | 0.2 | | 0.2 |
| Allocated Load | 500 | 232 | | 340 |
| Cum Load Reduction | 50% | 77% | | 66% |