

May 21, 2008

TO: Columbia and Snake River Dam Spill Operators

FROM: Susan Braley, Unit Supervisor
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SUBJECT: Clarification of WAC 201A-200(1)(f)(ii), Measuring Total Dissolved Gas (TDG) During Fish Spill on the Columbia and Snake Rivers

Note: This memorandum supersedes the directive sent from Chris Maynard dated April 2, 2008.

The regulations at WAC 201A-200(1)(f)(ii) for TDG provide a description of how TDG is to be measured. During the recent rule revisions in 2003, a change was made to add the word “consecutive” to the rule. The rule now reads:

- TDG must not exceed an average of one hundred fifteen percent as measured in the forebays of the next downstream dams and must not exceed an average of one hundred twenty percent as measured in the tailraces of each dam (these averages are measured as an average of the twelve highest **consecutive** hourly readings in any one day, relative to atmospheric pressure).

With the recent approval by EPA of the standards in February 2006, Ecology has been asked to clarify the purpose of this section, and expectations Ecology has for operators to measure TDG during fish passage spill on the Columbia and Snake Rivers.

Intent of Section WAC 201A-200(1)(f)(ii)

This section allows special fish passage exemptions to TDG for the Snake and Columbia rivers when spilling water at dams is necessary to aid fish passage. During fish spill on the Snake and Columbia rivers, TDG must not exceed an average of 115% in the forebays of the next downstream dams and must not exceed an average of 120% in the tailraces of each dam.

Ecology also specifies in this section that the “averages” are measured as an average of the **twelve highest consecutive hourly readings in any one day**. This part of the rule is intended to provide consistency in measurement methods between the dams on the Snake and Columbia rivers in order to properly manage spill and TDG on the rivers. This ensures that operators will manage TDG levels in a manner that allows maximum spills for fish while maintaining TDG levels at or below the special exemption thresholds, to the best of their ability.

The control of TDG from a dam operation for fish spill is not an exact science, and includes some uncertainty in finding the right balance between maximum spill for fish and staying under the thresholds. When the TDG levels have exceeded the special exemption thresholds, Ecology has used its enforcement discretion and has not taken enforcement

action as a result of the exceedance. Ecology intends to continue using this enforcement discretion in the near future during fish spill events.

In summary, at this time the main purpose of the TDG continuous average monitoring is for sound and proper management of fish spill and TDG on the rivers.

Ecology Expectations for TDG Measurements During Fish Spill

Washington's previous 1997 total dissolved gas (TDG) Water Quality Standards (WQS) for fish spill on the Snake and Columbia Rivers required TDG measurements to be taken at least hourly and the 12 highest measurements averaged over the course of a day. A day was assumed to be a 24 hours period although the start and end time were never clearly defined. The operators averaged measurements and reported based on a calendar day, starting at 12:a.m. and ending at 12 am. The term 'day' did not need to be defined because averaging any high TDG from midnight to midnight captured all high TDG readings. Often the high readings for tailtraces would occur during the early hours after midnight and in the evening hours with a period of lower readings in between during the day. This is because fish spill often occurs more at night.

The revised 2006 Washington WQS require measuring the average of the 12 highest *consecutive* hours in any one day. This is because at 120% TDG or less, studies indicate that aquatic organisms experience the most TDG harm from consecutive exposure, not intermittent exposure throughout a 24 hour period. High TDG and corresponding spills tend to occur during consecutive blocks of time. Measuring midnight to midnight breaks up the consecutive period of nightly high TDG.

Beginning with the 2008 spill season, the operators should use the following method to average and report the 12 consecutive hourly high TDG reading in a day:

Method: Use a rolling average to measure 12 consecutive hours. The highest 12 hour average in 24 hours is reported on the calendar day (ending at midnight) of the final measurement.

- The first averaging period of each calendar day begins with the first hourly measurement at 1:00 a.m. This hour is averaged with the previous day's last 11 hourly measurements.
- Each subsequent hourly measure is averaged with the previous 11 hours until there are 24 averages for the day.
- From the 24 hour averages, the highest average is reported for the calendar day.
- Round 12 hour average to nearest whole number.

Rationale for the rolling average: The standards say "in any one day", but a day need not be a calendar day. Defining a day as starting at a set hour (like midnight) and ending 24 hours later leaves only twelve 12-hour blocks to average within 24 hours. If a period ends at midnight, night spill TDG measurements would be cut off during the middle of the night and the consecutive readings of the highest spill period would not be averaged since the period from 12 midnight on would not be counted

with the previous day. So a rolling 12-hour average makes the most sense. This method best captures consecutive hours of high TDG not only below dams that spill at night, but also for dams that vary their hours of spill from nighttime. It also captures consecutive forebay readings which measure TDG from the upstream dam hours later.

On occasion a rolling average will result in reporting an exceedance occurring on a calendar day using some of the same hours to calculate an exceedance that occurred on the previous day (called double-counting). As mentioned in the "intent" section above, Ecology will continue to use its enforcement discretion for identified exceedances during these fish spill events.

The accompanying table shows an example of how the TDG should be tracked and averaged as a rolling average. It shows what hours will be reported for a day: the highlighted green and blue hours are those that are averaged each hour to report as May 19th. The first period evaluated for May 19th reporting begins with the first hour's measurements of the day. Since the previous 12 hour measurements are needed for a consecutive average, eleven of those hours (in the first highlighted column) will necessarily occur on May 18th. The next hour's measurement is then evaluated with the eleven hours previous, and so on through the day until the last measurement at midnight. There are now twenty-four averaging periods, and the highest average (ending at 2: a.m. May 19th) is chosen to report for May 19th.

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