

Drinking Water Quality Regulator for Scotland

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Douglas Millican
Chief Executive
Scottish Water
Castle House
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DUNFERMLINE
KY11 8GG

9 April 2015

Dear Douglas,

**Enforcement Notice Served Under Section 10 Water Industry (Scotland)
Act 2002:
Invercannie Water Treatment Works**

I wrote to you on 13 March 2015 attaching a copy of the enforcement notice that I planned to serve in relation to Invercannie WTW. I acknowledge Scottish Water's response of 27 March 2015 to this proposed enforcement notice and confirm that I have taken the company's comments into account when preparing the final version of the enforcement notice (attached).

I have considered Scottish Water's concerns regarding the phasing of the improvements in light of the on-going activities relating to other water treatment works and aqueducts in the Aberdeen and Aberdeenshire area. In response to this concern I have included a review of the completion date in step 2(f) which allows for the findings of study and pilot work to be taken into account.

If you have any queries regarding this letter please contact Bill Byers (0131 244 7330).

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Sue Petch'. The signature is written in a cursive, slightly slanted style.

Sue Petch
Drinking Water Quality Regulator for Scotland

Enforcement Notice Under Section 10 of the Water Industry Act 2002

The Drinking Water Quality Regulator for Scotland ("the Regulator"), in exercise of the powers conferred by section 10(1) of the Water Industry (Scotland) Act 2002 hereby gives notice that she believes that Scottish Water has in the period 1 January 2014 to 30 November 2014, contravened and is likely to continue to contravene, regulation 4(2)(b) of the Public Water Supplies (Scotland) Regulations 2014 ("the Regulations") and its predecessors in relation to the provision of drinking water from Invercarnie Water Treatment Works to the following water supply zones by failing to ensure that *Cryptosporidium* is removed or rendered harmless from the supply:

Mannofield North Water Supply Zone
Mannofield South Water Supply Zone
Mannofield East Water Supply Zone
Mannofield West Water Supply Zone
Invercarnie Water Supply Zone
Craigie Water Supply Zone

Therefore, Scottish Water is hereby required -

1. within 28 days from the date on which this notice takes effect, to confirm in writing to DWQR acceptance or otherwise of each recommendation contained within the independent Review of Treatment Effectiveness for Removal of *Cryptosporidium* report produced by Black and Veatch on 2 May 2014 and confirm progress against each action or alternative approach taken ;
2. Notwithstanding the above requirement, to complete the following in relation to Invercarnie WTW:
 - a. by 30 April 2015, to establish a robust means of directly monitoring membrane integrity at Invercarnie WTW, including an agreed method of indirect integrity verification and appropriate accompanying operational procedures;
 - b. by 30th June 2015 to have agreed in writing with DWQR a continuous coagulation control strategy and membrane plant performance monitoring strategy;
 - c. by 31st October 2015 to have implemented the agreed continuous coagulation control and membrane plant performance monitoring strategy;
 - d. by 31 December 2015, to have assessed the need for further investment to ensure the effective sustainable operation of the

membrane plant at Invercarnie to minimise the risk from *Cryptosporidium*;

- e. by 31st December 2015 to have assessed at pilot scale a pre-treatment process such as clarification and post membrane treatment inactivation of *Cryptosporidium* with UV irradiation;
 - f. by 31st January 2016 to have agreed with DWQR the need for further enhancement and if required to have agreed a completion to timeline to ensure the water treatment works is able to present a robust and consistent process to minimise the risk from *Cryptosporidium*;
 - g. by 30th September 2018 to have designed, constructed and commissioned appropriate modifications agreed under 2(f) to ensure that the water treatment works is able to present a robust and consistent process to minimise the risk from *Cryptosporidium*.
3. Until such time as these actions are delivered, Scottish Water shall monitor Invercarnie WTW at an enhanced frequency for *Cryptosporidium* and any other parameters it considers relevant, notifying DWQR of its intentions in this respect by 25 April 2015.
4. Scottish Water shall continue to liaise closely with Grampian NHS Board and DWQR and, if necessary, implement any agreed measures to minimise risk to public health until such time as the actions identified in this enforcement notice are complete.

This notice takes effect 15 days after the date shown below.

DRINKING WATER QUALITY REGULATOR FOR SCOTLAND

Date: 10 April 2015