



Drinking Water Quality Regulator
for Scotland

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CPHM Newsletter

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Welcome

This is our third, long overdue, newsletter to CPHMs which aims to improve communications, let you know a little about what is going on in the world of water quality and regulation and to spread awareness of water quality issues around Scotland. Since the last newsletter in 2011, Sue Petch has been appointed as the new Regulator and began working with us in October last year.

Sue comes to us with considerable experience in the UK water industry having been Water Quality Manager at Northumbrian Water. Although the regulation of drinking water in England is separate from Scotland, there are many parallels and Sue's perspective on alternative approaches to water supply and regulation has already proven extremely useful to the team.

Events and Incident Reporting

As you will be aware, the monitoring and investigation of water quality events and incidents is an important part of our role. We review all events reported to us by Scottish Water and classify the more serious as incidents, warranting closer investigations.

Where necessary, we request a full report from Scottish Water and we will share these with CPHMs and EHOs in the area affected. Please feel free to provide us with any comments or information you may wish to share in relation to the incident and we will take this into account during our investigations. Once we have completed our investigation into the incident we produce an assessment which will be published on our website – this will include actions Scottish Water has agreed in response to the incident plus any additional recommendations we have made. All actions and recommendations are tracked by us to ensure they are completed.

Some of you may know that this year we have moved to system of priority reporting, whereby Scottish Water reports the most significant events to us when they occur, but less serious ones are reported together the following month. The timescale of reporting makes no difference to the expectation that all events will be investigated by Scottish Water and reported appropriately. We are still scrutinising all lower priority failures, however this change does streamline our approach to events and enable us to better focus on those that have the potential to be more serious.

The system is currently working well for us and work by Scottish Water to adapt the approach for reporting to CPHMs and EHOs is advanced. This work has also looked at improving the reporting format. Following discussion with a short-life working group of CPHM and EHO representatives earlier in the

year, Scottish Water plan to present a detailed proposal for final agreement shortly, and reporting could commence at the start of the year.

Inspections

DWQR undertakes various inspections of Scottish Water activities and assets. So far this year we have audited 8 treatment works, including Invercarnie, Muirdykes and Bradan, and have undertaken a number of inspections of work on the distribution system by both Scottish Water and contractors. Most inspections result in a number of recommendations being made. Although we saw much good practice at treatment works a number of common themes did emerge, including the need for timely effective maintenance of assets, control of coagulation processes and aspects of filter operation.



Hollow fibre membrane used at Invercarnie WTW (end on). The membrane is composed of many hollow fibres, like drinking straws. These are submerged in the water to be treated and this is sucked through the walls into the membrane straw, filtering it. Clean permeate water is pumped out of the end of each hollow fibre.

Research

We have commissioned two research projects recently. The first is a short duration project to examine our data on events and incidents to identify common root causes that could be used to target our inspection activities more effectively. The second is a project to look at disinfection of private water supplies and how this can be made more effective in an effort to

reduce the number of samples containing *E.coli* from supplies apparently having some form of disinfection process and having had grant improvement money spent on them.

Private Water Supplies Workshop

DWQR held a workshop at the COSLA conference centre in Edinburgh on 31 October which focussed on developing proposals for an improvement strategy for private water supplies (PWS). Around 90 people attended this workshop. They were primarily from the health boards and local authorities in Scotland, but we also had colleagues from the Drinking Water Inspectorate in London and the Drinking Water Inspectorate (Northern Ireland) in Belfast joining us. Presentations were given by Health Protection Scotland, Argyll and Bute Council and Orkney Islands Council which explained the importance of trying to ensure a good quality water supply to protect public health. DWQR presented a first draft of an improvement strategy to improve the quality of PWS and the various strands of this were discussed on each of the ten round tables with a facilitator at each table providing written feedback after the end of the workshop. This feedback is already providing very valuable information to develop the strategy, so DWQR is grateful for everyone who took part in the workshop and in particular the discussion session. Many people considered that the workshop had been worthwhile and there are plans to hold another one next year at about the same time and at the same venue.

Enforcement Policy

The term “enforcement” refers to the range of tools available to us to ensure that Scottish Water is doing all it can to supply compliant water and protect public health. There are a number of approaches we can take, depending on the severity of the issue and how appropriately we feel the matter is being addressed by Scottish Water. At the most severe end of the scale, sanctions include the serving of an enforcement notice and, potentially, prosecution, however this is only

used as a matter of last resort. In most circumstances, Scottish Water is more likely to be given the opportunity to provide a legally binding commitment in the form of an undertaking.

It is important that any action we take is proportionate and consistent, and that our decision making process is transparent to Scottish Water and other stakeholders. With this in mind, DWQR has drafted an Enforcement Policy, which sets out how we will deal with enforcement matters. This document will be published soon, both on our website and in printed form. We will send printed copies to all health boards and local authorities.

INCIDENT SUMMARY

Crianlarich WTW, February 2012

In February Scottish Water received a number of calls from consumers in the Stirlingshire village of Crianlarich reporting a chemical smell from their drinking water supply, with some describing it as like paraffin. Sample results showed hydrocarbons present to a concentration of 84mg/l. Initially nothing was found, but a few days later a fuel type odour was detected in the raw water inlet chamber at the treatment works. A restriction was placed on consumers using the supply.

Upon investigation at the treatment works it was eventually found that a section of flexible pipe used as part of a temporary raw water transfer main was suspected to have been contaminated with diesel. The chamber, pipelines and membrane treatment plant were thoroughly cleaned and, following clear water samples, the restrictions were lifted approximately 4 days after they were imposed. It is considered likely that the pipe section may have been exposed to contamination over a period of time at a previous location. In response to the incident, Scottish Water has reviewed internal procedures and audited framework suppliers to emphasise the issue and prevent a similar issue recurring. DWQR also plans to audit Scottish Water procurement processes in 2013.

Guidance on Water Incident Management



In Scotland we can be proud of our Scottish Waterborne Hazard Plan (SWHP), which is a multi-agency document providing clear information on the steps to be taken during and following a serious water quality incident. This will always be the main point of reference for such matters in Scotland, however the UK water industry body, Water UK, also produces authoritative guidance based on industry best practice. This long-standing document, *Technical Guidance Note 10 Event and Incident Management* is available online. Some key points are:

- the need for regular liaison between water company and key stakeholders;
- the need to have pre-prepared warning cards and press statements and agreed criteria for the lifting of these once the incident is over;
- Guidelines for investigation of incidents and practical steps to resolve them;
- the need to clearly establish when water quality has been restored, usually with 2 clear sets of samples at least 12 hours apart.

The full document is available [here](#). DWQR is likely to reference this document in assessing future Scottish water quality incidents. The overarching document [Principles of Water Supply Hygiene](#) may also be of interest – this describes the general approach to hygiene to be taken in all aspects of water operations.

www.dwqr.org.uk



DWQR – What Do We Do?

DWQR regulates the quality of drinking water in Scotland. Sue Petch is the DWQR and she has a small team of technical experts to assist him. They are based in Edinburgh but they ensure that they cover the whole of Scotland.

Public Water Supplies

DWQR regulates the quality of water supplies provided by Scottish Water by monitoring analytical data and by inspecting Scottish Water's assets and operational practices.

Events and Incidents

When failures and events occur we monitor and assess them. We classify the most significant events as incidents and request a full report from Scottish Water, before investigating and making our own assessment and recommendations.

Powers

DWQR has the power to obtain any information and enter any premises required in the exercise of his / her duties. Where Scottish Water persistently fails to supply water of an acceptable quality, DWQR may issue an enforcement notice, requiring Scottish Water to undertake the required actions by a certain date. We will notify consumers and stakeholders when we issue an enforcement notice. Enforcement notices are issued as a last resort where discussion with Scottish Water has failed to resolve the problem.

Prosecution

Where other methods have failed, or if an incident is particularly serious, DWQR may send a report to the Procurator Fiscal recommending a prosecution under Section 76 C of the Water (Scotland) Act 1980.

Investment

Investment in the Scottish Water Industry is controlled by the Water Industry Commission (WICS). DWQR has a significant input into the investment process relating to projects to improve water quality, but does not have the final say when it comes to the funding of water quality projects. It is sometimes the case that projects to improve quality will not be funded until the next five year investment period. In such instances DWQR will require Scottish Water to have a strategy in place to maintain quality as far as possible and to protect consumers.

Private Water Supplies

These are supplies that are not operated by Scottish Water. They serve approximately 3% of the population and are regulated by the relevant local authority using the Water Supply (Water Quality) (Scotland) Regulations 2006. DWQR has a responsibility to oversee the quality of private supplies and how Local Authorities are enforcing them. Grant funding is available to owners of failing private supplies to make the necessary improvements.

Small Supply Best Practice

DWQR is actively involved in promoting best practice in treating and distributing water from small supplies. This includes acting as a central point of contact and advice for local authorities in Scotland, at a UK level via other drinking water quality regulators and on a global scale through participation in programmes developed by organisations such as the European Union and World Health Organisation.

Private Water Supply Quality Data

The 2006 regulations have greatly increased the amount of information available on the quality of private water supplies. DWQR is collating this data and aims to present it via the DWQR Annual Report.