

## **SECTION 13: AUDIT OF PRIVATE WATER SUPPLIERS BY THE WSAS**



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## Section 13: Audit of WSAs by the EPA

### **Summary of Section 13**

- ◆ Describes the regulatory requirement for each Water Services authority (WSA) to audit private water supplies to verify that private water suppliers are complying with the regulatory requirements.
- ◆ Sets out the risk based approach that the Environment Protection Agency (the EPA) requires WSAs to use to formulate their annual plan for audit of private water supplies.
- ◆ Describes the areas of the private water supplier's operations that could be included in an audit.
- ◆ Sets out what may be included in the WSA's reports on audits and the timetable for issue of reports and for private water suppliers to reply to reports.

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## 1. Introduction

1.1 | Regulation 17 of the regulations requires each **supervising authority** to undertake an **audit** of water supplies for which it has supervisory responsibility to ensure that the provisions of the regulations are met by the relevant water supplier. This means that in respect of private water supplies each Water Services Authority (WSA), as the supervisory authority, is required to audit the performance of private water suppliers within its functional area to verify that they are complying with the regulatory requirements. This section sets out the Environment Protection Agency's **(the EPA's) binding guidance** to WSAs on the content and frequency of the audits of private water supplies.

## 2. Audit requirements

2.1 | Each WSA is required to prepare an annual audit plan. The EPA required the first audit plan to be prepared by 31 January 2009 and for each WSA to adopt a **risk based approach**. Thus the first plan was required to include as a minimum all private water supplies that:

- ◆ have water restrictions (advice to boil water, advice not to drink water etc) in place; or
- ◆ have persistent non-compliance with the health based standards in tables A and B of part 1 of the schedule to the regulations, particularly in respect of the microbiological standards (more than one *E coli* non-compliance over the previous two years); or;
- ◆ have no treatment; or
- ◆ have treatment plants that are over-loaded; or
- ◆ have been categorised as high or very high risk in relation to *Cryptosporidium*.

2.2 | Subsequent annual audit plans should be based on similar risk criteria. Some private water supplies may need annual audits until such time as appropriate actions have been taken and completed to ensure the safety and security of the supplies. The effect of this risk based approach to audits will be that those private water suppliers that are performing relatively poorly in respect of drinking water quality will have a

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greater frequency of audit and those that are performing better will have a lesser frequency of audit. Each WSA must audit each Public Group Water Scheme and each Private Group Water Scheme at least once in every 5 year period.

2.3 | Each WSA should make provision in its annual plan for unscheduled audits in response to significant notifications by private water suppliers of incidents affecting private water supplies.

### 3. Format of audits

3.1 | The format of the audit will depend on the individual supply and the reason for carrying out the audit. The following areas are likely to be included in audits:

- ◆ identification of the risks and measures for the protection of the raw water source;
- ◆ protection of the abstraction point of the raw water source;
- ◆ quality of the raw water;
- ◆ suitability of the treatment processes for the raw water quality;
- ◆ *Cryptosporidium* risk screening and appropriate barriers for the level of risk;
- ◆ throughput of works compared to the safe operating/design capacity of the works;
- ◆ operation of treatment processes such as coagulation, clarification, filtration and disinfection with particular attention to operational monitoring and control;
- ◆ condition of treatment systems including maintenance;
- ◆ review of chemicals used to ensure they are suitable for drinking water treatment and are delivered, stored and used appropriately;
- ◆ review of the efficiency of the disinfection process and adherence to the operating criteria set out in sub-section 5 of section 6 of this handbook;
- ◆ corrective action procedures when there is a failure to meet a standard or other regulatory requirements;
- ◆ review of operational monitoring results and record keeping;

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- ◆ operation and maintenance of the distribution network;
- ◆ progress in developing and implementing Drinking Water Safety Plans (DWSPs);
- ◆ unaccounted for water levels (leakage etc); and
- ◆ any other matter considered necessary by the WSA, such as handling of consumers' complaints and incident and emergencies procedures.

## 4. Reports on audits

4.1 | Once it has completed an audit, the WSA should hold a short debriefing meeting with the private water supplier at which it will give the supplier a verbal summary of the main findings of the audit. The WSA will prepare a final report of the audit as soon as possible after the audit. This report generally will set out the purpose of the audit, what was audited, who was present, summary of the main findings/recommendations, description of what was found and observed and recommendations. The WSA sends the final report to the private water supplier and the private water supplier is required to reply within the time frame specified in the final audit report to the recommendations setting out what it has done, or proposes to do, to satisfy those recommendations.