

SECTION 13: AUDIT OF WSAS BY THE EPA



Issue No:	1
Date:	12 April 2010

Section 13: Audit of WSAs by the EPA

Summary of Section 13

- ◆ Describes the regulatory requirement for the Environment Protection Agency (the EPA) to audit supplies made by the Water Services Authorities (WSAs) to verify that they are complying with the regulatory requirements.
- ◆ Sets out the risk based approach that the EPA uses to formulate its annual plan for audit of WSAs.
- ◆ Describes the areas of the WSA's water supply operations that could be included in an audit.
- ◆ Sets out what may be included in the EPA's reports on audits and the timetable for issue of reports and for WSAs to reply to reports.

Contents of Section 13

1. Introduction
2. The EPA's audit policy
3. Format of audits
4. Reports on audits

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 public water supplies the Environment Protection Agency (the EPA), as the supervisory authority, is required to audit the performance of Water Services Authorities (WSAs) to verify that they are complying with the regulatory requirements. This section sets out the EPA's policy on the content and frequency of its audits of public water supplies.

Issue No:	1
Date:	12 April 2010

2. The EPA's audit policy

2.1 | The EPA prepares an annual plan for the audit of each WSA. The EPA adopts a **risk based approach** to the audit of WSAs and their water supplies. Consequently, this plan may, as a minimum, include all water supplies operated by the WSA 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 the microbiological standards; 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 | The EPA also makes provision in its annual plans for audit of supplies included in the "Remedial Action List (RAL)" and for unscheduled audits in response to significant notifications by WSAs of incidents affecting public water supplies.

2.3 | The effect of this risk based approach to audits will be that WSAs that are performing relatively poorly in respect of drinking water quality will have a greater degree of audit (more supplies and higher frequency) and those that are performing better will have a lesser degree of audit (fewer supplies and lesser frequency).

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;

Issue No:	1
Date:	12 April 2010

- ◆ *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 monitoring results, record keeping and reporting of drinking water quality;
- ◆ operation and maintenance of the distribution network;
- ◆ unaccounted for water levels (leakage etc);
- ◆ progress in developing and implementing Drinking Water Safety Plans (DWSPs);
- ◆ progress with action programmes for supplies on the RAL; and
- ◆ any other matter considered necessary by the EPA, such as handling of consumers' complaints and incident and emergencies procedures.

4. Reports on audits

4.1 | Once it has completed an audit, the EPA holds a short debriefing meeting with the WSA at which it will give the WSA a verbal summary of the main findings of the audit. The EPA prepares a final report of the audit as soon as practical after completion of 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

Issue No:	1
Date:	12 April 2010

what was found and observed and recommendations. The WSA 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.

4.2 | Each WSA is recommended by the Department of Environment, Heritage and Local Government (Circular letter WSP 6/09) to place a copy on its web-site of all EPA audit reports on the WSA's performance.

Glossary: list of acronyms

AQC	Analytical quality control
BS	British Standard
CD	Compact disc
CEN	Comité Européen de Normalisation (European Committee for Standardisation)
CSM	Conceptual site model
DBO	Design, build and operate
DBPs	Disinfection by-products
DED	District electoral division
DoEHLG	Department of the Environment, Heritage and Local Government
DWI	Drinking Water Inspectorate of England and Wales
DWIRP	Drinking Water Incident Response Plan
DWNMP	Drinking Water National Monitoring Programme
DWSP	Drinking Water Safety Plan
EC	European Communities
E. coli	Escherichia coli
EDEN	Environmental data exchange network
EEC	European Economic Community
EPA	Environment Protection Agency
EU	European Union
EUSR	Energy and Utility Skills Register
GAC	Granular activated carbon
GANNT	Chart named after Henry Gannt
GCMS	Gas chromatography/mass spectrometry
GIS	Geographic Information System
HSE	Health Service Executive
IGN	Information guidance note (UK)

Issue No:	1
Date:	12 April 2010

INAB	Irish National Accreditation Board
IPPC	Integrated pollution prevention control
IRT	Incident response team
ISO	International Standards Organisation
LIMS	Laboratory information management system
LIXIE	A data conversion and transfer tool
NTU	Nephelometric turbidity unit
OCT	Outbreak control team
PAH	Polycyclic aromatic hydrocarbons
PE	Population equivalent
PMS	Performance management system
PrGWS	Private Group Water Scheme
PuGWS	Public Group Water Scheme
RAL	Remedial action list
RPII	Radiological Protection institute of Ireland
SCADA	Supervisory control and data acquisition
S.I.	Statutory Instrument
SOP	Standard operating procedure
SPA	Special protection area
S-P-R	Source-pathway-receptor
SPZ	Source protection zone
THMs	Trihalomethanes (disinfection by-products)
TID	Total Indicative Dose (radioactivity parameter)
TOC	Total organic carbon
UK	United Kingdom
uPVC	Unplasticised polyvinyl chloride
US	United States
UV	Ultra-violet
UWWT	Urban waste water treatment
WFD	Water Framework Directive
WHO	World Health Organisation
WIS	Water industry specification (UK)
WSA	Water Services Authority
WSTG	Water Services Training Group

Issue No:	1
Date:	12 April 2010