



Drinking Water Audit Report

County:	Kerry County	Date of Audit:	23/10/2014
Plant(s) visited:	Lisloose, St Brendan's Park, Tralee, Kerry	Date of issue of Audit Report:	05/11/2014
		File Reference:	DW2008/330
		Auditors:	Mr. Niall Dunne. Ms. Cliona Ní Eidhin.
Audit Criteria:	<ul style="list-style-type: none"> • The <i>European Union (Drinking Water) Regulations 2014 (S.I. 122 of 2014)</i>. • The <i>EPA Handbook on the Implementation of the Regulations for Water Services Authorities for Public Water Supplies (ISBN: 978-1-84095-349-7)</i> • The recommendations specified in the EPA Report on <i>The Provision and Quality of Drinking Water in Ireland</i>. • The recommendations in any previous audit reports. 		

MAIN FINDINGS

- The EPA issued a Direction to Kerry County Council on 28/8/2011 requiring the Local Authority to replace lead mains in Tralee, Co. Kerry by 25/12/2013. This Direction has not been complied with, as 996 m of lead mains remains in use in St. Brendan's Park, Tralee, Co Kerry.
- A contractor was appointed on the 06/10/2014 to replace the lead mains / communications pipes in the ownership of the Water Services Authority in St Brendan's Park.
- During the audit it was observed that preliminary works had begun and that the installation of the new mains is scheduled to commence on the 04/11/2014. The works are schedule to be completed by May 2015.

1. INTRODUCTION

Under the *European Union (Drinking Water) Regulations 2014* the Environmental Protection Agency is the supervisory authority in relation to Irish Water and its role in the provision of public water supplies.

This audit was carried out to assess the performance of Kerry County Council and Irish Water in complying with the EPA Direction issued on the 28/08/2011, for the identification and removal of lead mains in Tralee, Co Kerry. All lead mains identified were required to be removed by the 25/12/2013. According to Kerry County Council the only lead distribution mains remaining in Tralee are the 996 m located in St. Brendan's Park.

The opening meeting commenced at 11.00 am at the Kerry County Council buildings in Castleisland Co. Kerry. The scope and purpose of the audit were outlined at the opening meeting. The audit process consisted of interviews with staff, review of records and observations made during the initial meeting

and the site inspection in St Brendan's Park. Photograph taken by Niall Dunne during the audit are included in Appendix 1. The audit's observations and recommendations are listed in Section 2 and 3 of this report.

The following were in attendance during the audit.

<p>Representing Kerry County Council (KCC) and Irish Water (IW):</p> <p>Kevin Murphy – Water Engineer, IW; (Attended site visit)</p> <p>Darran O'Leary – Irish Water Capital, IW;</p> <p>Noirin O Connor – Solicitor, KCC;</p> <p>John Kennelly – Senior Engineer, KCC;</p> <p>John Ahern – Acting Senior Executive Engineer, KCC; (Attended site visit)</p> <p>Karl Falvey – Assistant Engineer, KCC; (Attended site visit)</p>
<p>Representing the EPA</p> <p>Mr. Niall Dunne – Inspector. (Attended site visit)</p> <p>Ms. Cliona Ní Eidhin – Inspector. (Attended site visit)</p>

Description

On the 28/08/2011 a Regulation 16(1) Direction of the *European Communities (Drinking Water) (No. 2) Regulations 2007* (S.I. 278 of 2007) was issued to Kerry County Council (KCC) for the identification of the length and location of lead distribution mains in Tralee Co. Kerry. The Direction required a report to be submitted to the EPA by the 28/11/11 and any lead distribution mains identified to be removed by 25/12/2013.

On the 30/11/11, KCC informed the EPA that 996 m of lead mains remained in St Brendan's Park, Tralee and that this was to be removed by Q 4 2012. Other areas identified with lead distribution main at that time were Cloonbeg Terrace (275 m); Clonmore Road (123 m) and Baloonagh Close (90 m).

On the date of the audit, KCC stated that the only lead distribution mains remaining in Tralee Co. Kerry were 996 m located in St. Brendan's Park. These mains, which serve 231 properties, are located in the backyards of the properties. KCC confirmed that lead has been removed from all other areas in Tralee.

According to KCC, on the 06/10/14 a contractor was appointed to replace the remaining lead mains in St. Brendan's Park. Trial-hole works commenced on the 21/10/14; the estimated completion date for the project is 14/05/15.

2. AUDIT OBSERVATIONS

The audit process is a random sample on a particular day of a facility's operation. Where an observation or recommendation against a particular issue has not been reported, this should not be construed to mean that this issue is fully addressed.

1.	<p>Contract History</p> <p>KCC and Irish Water (IW) outlined the contract history. The mains points are summarised below;</p> <ol style="list-style-type: none"> In 2009, KCC initiated a water conservation project in Tralee, Co. Kerry. The scope of the project was to reduce leakage by mains rehabilitation within specific areas, District Meter Areas (DMAs). St. Brendan's Park was one of the DMAs included in this project. Replacement of lead mains in St. Brendan's was proposed to be achieved under this project. In 2010 the Department of Environment, Heritage and Local Government (DoEHLG) announced funding, in principal, for this project. On the 24/05/2011 DoEHLG approved KCC's works strategy, and KCC set about identifying the areas with the highest mains leakage levels. In March 2012, KCC made a submission to DoEHLG for funding for mains rehabilitation within
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	<p>six estates including St. Brendan's Park. On the 16/10/2012, KCC received funding approval from the DoEHLG for € 2.6 million for the mains rehabilitation project. Door to door surveys, site investigations, topographical surveys were all completed and the final site investigation report was received in June 2013.</p> <p>e) 19/12/2013 tenders for the works were advertised.</p> <p>f) 01/01/2014 IW became the new Water Services Authority.</p> <p>g) 07/02/2014 KCC received tenders for the works. Tender evaluation was completed by March 2014.</p> <p>h) 21/05/2014 KCC submitted the successful tender to IW. On the 18/06/2014 IW approved the allocated budget. 27/06/2014 IW requested the successful contractor to submit required contract documentation. On the 29/08/2014 the contractor had failed to comply with the specified deadline for the submission of the bond.</p> <p>i) 02/09/2014 IW initiated the validation process for the next lowest tenderer. The validation process was completed on the 02/10/2014 and the contract was signed and executed on the 06/10/2014.</p>
2.	<p>Program of works</p> <p>a) KCC stated that in total approximately 367 house connections will be replaced, these consist of both lead and iron service connections, of which 231 service connections are lead.</p> <p>b) At the time of the audit, KCC stated that the contractor was carrying out house hold surveys.</p> <p>c) Trial-hole work commenced on the 21/10/2014. Pipe replacement work was scheduled to commence on the 04/11/2014, KCC stated that this could be expedited so as to start on the 28/10/2014.</p> <p>d) KCC stated that the new trunk main will be laid by open trench and directional drilling, with house connections scheduled to begin on the 11/11/2014.</p> <p>e) KCC stated that there are several different options to replace the lead service connections which are located at the rear of the houses.</p> <p style="padding-left: 40px;">Option 1) Directional drill from the street underneath the houses to the stop cock located at the rear of the property.</p> <p style="padding-left: 40px;">Option 2) Directional drill from the street to the front wall of the house. Externally fix an insulated pipe containing a new service connection to the exterior of the house and then connect this pipe to the existing cold feed in the attic.</p> <p style="padding-left: 40px;">Option 3) Comprises all other options such as excavating around the side of end of terrace houses to reach the service connection located at the rear.</p> <p>f) IW confirmed that where lead is observed internally, that these premises would be noted and, following consultation with the HSE, that appropriate advice would be given to these consumers.</p> <p>g) The old lead distribution mains are scheduled to be decommissioned within the existing contract once all consumers on each sub-loop within St. Brendan's Park are connected to the new main.</p> <p>h) The proposed completion date of the works is 14/05/2015.</p>
3.	<p>Advice to consumers</p> <p>a. IW stated that a letter will be delivered to each consumer informing them when the contractor will be on site. On the 23/10/2014 the contractor commenced door to door calls to inform consumers of the start of the works and to conduct house surveys.</p> <p>b. KCC stated that monitoring has only been carried out in premises where lead monitoring was requested by residents.</p> <p>c. IW stated that health advice as per HSE guidance had only been given to premises where lead monitoring results are above the parametric limit. The health advice from the HSE, where lead monitoring results were above the parametric limit even after flushing, is that safe drinking water from another source should be used. IW stated that they do not intend to supply an alternative source of drinking water to consumers. No formal advice has issued to un-sampled properties.</p> <p>d. KCC stated that water results have been received for five properties in the estate, all of which were above the parametric limit. A further four properties were also recently sampled, results are awaited. In correspondence subsequent to the audit, the EPA was informed that IW is developing a monitoring program in consultation with the HSE for the St. Brendan's Park estate. IW is to submit details of the monitoring program</p>
4.	<p>On Site Audit</p> <p>a. Excavation of trial holes was observed to be ongoing on site, see Photograph 1. At the time of the audit no mains replacement work was observed to have started.</p>

3. AUDITORS COMMENTS

On the 28/08/2011 a Direction was issued by the EPA to Kerry County Council for the removal of lead distribution mains in Tralee, Co. Kerry by the 25/12/2013. The Direction has not been complied with as, according to Kerry County Council, 996 m of lead distribution main remain in use in St. Brendan's Park, Tralee, Co Kerry. Failure to comply with this Direction is an offence under Regulation 16(2) of S.I 122 of 2014.

On the 06/10/2014 a contractor was engaged for the removal of lead main in St Brendan's Park, Tralee; 9 months after the deadline set out in the Direction. The contract includes the laying of replacement mains, household connections and the decommissioning of the old lead main. On 21/10/2014 preliminary works commenced on site, works are scheduled to be completed by May 2015. The Water Services Authority must ensure that these works are completed with the utmost urgency, to ensure compliance with the 2014 Drinking Water Regulations and to protect the health of consumers.

Until the contract and works are completed, the Water Services Authority should implement the monitoring program as agreed with the HSE and should ensure that consumers are given appropriate health advice as per HSE guidance, especially that safe drinking water from some source should be used where flushed lead results are above the parametric limit.

4. RECOMMENDATIONS

1. The Water Services Authority should ensure that all lead mains in St. Brendan's park in the ownership of the Water Services Authority are replaced as a matter of priority and as required by the EPA Direction.
2. The Water Services Authority should ensure, following consultation with the HSE; that appropriate health advice is given to consumers within St. Brendan's Park.
3. The Water Services Authority should in consultation with the HSE provide advice to consumers where internal lead pipework has been identified in any privately owned premises in St. Brendan's Park
4. The Water Services Authority should, following consultation with the HSE, submit the monitoring program for St. Brendan's Park.
5. The Water Services Authority should submit monthly updates to the EPA on the progress of the lead removal works.

5. FOLLOW-UP ACTIONS REQUIRED BY IRISH WATER

During the audit the Water Services Authority representatives were advised of the audit findings and that action must be taken as a priority by the Water Services Authority to address the issues raised. This report has been reviewed and approved by Ms Yvonne Doris, Drinking Water Team Leader.

Irish Water should submit a report on the recommendations within one month of the date of issue of this audit report and further reports on progress of the works should be submitted monthly.

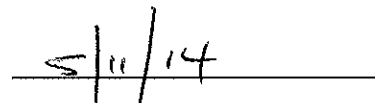
Please quote the File Reference Number DW2008/330 in any future correspondence in relation to this Report.

Report prepared
by:



Inspector

Date:



Appendix 1

Photograph 1 – Evidence of trial holes excavated on site in St. Brendan's Park.



