

# Local Authority Monitoring Programme Audit Report

Under the *European Union (Drinking Water) Regulations 2023*, the Environmental Protection Agency (EPA) is the supervisory authority in relation to Local Authority’s monitoring functions of regulated private drinking water supplies. This audit was carried out to assess the performance of Monaghan County Council in carrying out its 2022 compliance monitoring programme of regulated private supplies in its functional area.

The audit process is a sample of the performance of a Local Authority in carrying out its monitoring functions of regulated private drinking water supplies.

Audit Detail	
<b>Date of Audit</b>	13/06/2023
<b>Local Authority</b>	Monaghan County Council
<b>Representing the Local Authority</b>	Oliver Murtagh, Siobhan Mallon, John Paul McEntee.
<b>EPA Inspector(s)</b>	Derval Devaney, Lisa Noone.

Report Detail	
<b>Audit Specification</b>	2022 Regulated Private Drinking Water Supply Compliance Monitoring Programme and Regulated Private Drinking Water Supply Register
<b>Issue Date</b>	28/06/2023
<b>Prepared By</b>	Derval Devaney, Inspector, EPA

## > Report Main Findings and Recommendations

1. Monaghan County Council was found to be performing well in assessing the quality of private water supplies during 2022.
2. The register was not fully complete and reviewed on an annual basis for the small private supplies, to ensure it contains up to date and accurate data.
3. There was a lack of pre-determined sampling locations to ensure samples are evenly spread and, where appropriate, representative of the water supply zone.

## > Introduction

During 2022, each Local Authority was required under Regulation 7 of the *European Union (Drinking Water) Regulations 2014 (S.I. 122 of 2014)*, as amended to establish a monitoring programme and monitor all private water supplies in its functional area, other than exempted supplies, to determine whether they comply with the standards and other requirements of the Regulations.

The above Regulations have been replaced and so this audit was carried out in accordance with Regulation 13(1) of the *European Union (Drinking Water) Regulations 2023 (S.I. 99 of 2023)*, to assess the performance by Monaghan County Council of its statutory functions in relation to the monitoring of regulated private water supplies to ensure the provision of clean and wholesome drinking water.

Prior to the audit, the EPA assessed the 2022 monitoring returns submitted to the EPA by Monaghan County Council to identify any areas of discrepancy between the required number of samples to be taken and analysed and that reported to EPA. Using a questionnaire as a guide, Monaghan County Council staff were interviewed to ascertain the principles and methodology for establishing its private supply register and compliance monitoring programme. An INAB accredited laboratory undertake compliance analysis of the regulated private water supplies on behalf of Monaghan County Council.



1.1

	Answer
Does the Private Supply Register contain all that is required by Regulation 8(3) of the European Union (Drinking Water) Regulations 2014 (S.I. 122 of 2014)?	No
<b>Observation</b>	
<ol style="list-style-type: none"><li>1. Monaghan County Council's Private Water Supply Register contains 23 regulated private water supplies; 12 Private Group Water Schemes (10 of which are operated under a Design, Build and Operate contract) and 11 Small Private Supplies (i.e., supplies serving a commercial or public activity such as hotels, crèches and service stations).</li><li>2. The sources of Small Private Water Supplies were omitted from the Private Water Supplies Register.</li><li>3. The Small Private Water Supply's volume and treatment type tends to be estimated by the Local Authority.</li><li>4. While the register is updated annually for Group Water Schemes, it is not updated at that frequency for Small Private Supplies.</li></ol>	



		<b>Answer</b>
2.1	Have sampling locations been pre-determined for each water supply zone?	No
<b>Observation</b>		
<ol style="list-style-type: none"> <li>1. Monaghan County Council undertake the sampling of private water supplies. The locations for sampling during 2022 were not pre-determined at the start of the year and entered into the compliance monitoring plan.</li> <li>2. The sampling locations are randomly selected by sampling staff during the sampling event, based on their experience of the water supply.</li> <li>3. Sampling kiosks located on the network were used for monitoring purposes during 2022, rather than at the point of compliance (for example at the cold-water kitchen tap), due to the Covid pandemic.</li> <li>4. Monaghan County Council confirmed that sampling kiosks are no longer being used to monitor for compliance purposes and 2023 samples are taken from the point of compliance.</li> </ol>		
		<b>Answer</b>
2.2	Are sampling locations evenly spread for each water supply zone?	No
<b>Observation</b>		
<ol style="list-style-type: none"> <li>1. Each Group Water Schemes' water supply zone was recently electronically mapped. The 2022 sampling locations for each Group Water Scheme were also electronically mapped as an overlay on the water supply zone. This illustrated compliance monitoring for some schemes were not evenly spread to ensure compliance sampling is representative of the entire water supply zone.</li> <li>2. Monaghan County Council stated the use of sampling kiosks during the Covid pandemic would have attributed to the lack of sample spread during 2022.</li> <li>3. An overview of compliance sampling locations to assess the sample spread is not routinely carried out each year. Now that the water supply zones are electronically mapped it is a process Monaghan County Council intends to carry out annually to ensure compliance sampling is representative of the entire water supply zone.</li> </ol>		
		<b>Answer</b>
2.3	Was the required compliance monitoring for regulated private supplies undertaken during 2022?	No
<b>Observation</b>		
<ol style="list-style-type: none"> <li>1. Based on Monaghan County Council's population and volume data submitted to the EPA on EDEN for the Hillgrove Hotel small private supply, two Group A and one Group B compliance monitoring sample was required to be taken during 2022. Instead, three Group A samples were taken.</li> <li>2. Nitrite was not being monitored at the water treatment plants of private water supplies.</li> </ol>		

2.4

	Answer
Was 2022 data for private water supplies reported accurately to the EPA (on EDEN)?	No
<b>Observation</b>	
<ol style="list-style-type: none"><li>1. The EPA's records (on EDEN) relating to some private water supplies had no treatment identified, however there was information relating to treatment in place on the Register of Private Water Supplies maintained by Monaghan County Council.</li><li>2. There was a discrepancy between the EPA's EDEN records and Monaghan County Council's records in terms of the volume and population figures for some private water supplies.</li><li>3. Some parameters' monitoring categories were mapped incorrectly on the 2022 compliance monitoring returns submitted to the EPA. For example, aluminum was mapped as a Group A parameter when it should have been mapped as a Group B parameter.</li></ol>	



	2022 Monitoring Programme Audit Recommendations
	<p><b>Monaghan County Council is responsible for undertaking compliance monitoring of regulated private drinking water supplies and should implement the following recommendations without delay.</b></p> <ol style="list-style-type: none"><li>1. Record all relevant information pertaining to each private water supply for the purposes of the register and the compliance monitoring programme as required by <i>14(5) of the European Union (Drinking Water) Regulations 2023 (S.I. 99 of 2023)</i>. Keep the register accurate, up to date, with data relating to the small private supplies verified with the water supplier.</li><li>2. Include predetermined sampling locations in the compliance monitoring programme in accordance with <i>Regulation 13(6) of the European Union (Drinking Water) Regulations 2023 (S.I. 99 of 2023)</i>.</li><li>3. Carry out compliance sampling at the point of compliance in accordance with <i>Regulation 7 of the European Union (Drinking Water) Regulations 2023 (S.I. 99 of 2023)</i>.</li><li>4. Review the temporal and spatial distribution of sampling for compliance monitoring for Group Water Schemes. A formal and structured method of assessment should be developed and implemented to ensure that sampling represents the entire water supply zone as accurately as possible. The spread of sample days, times and locations within a monitoring programme should be as wide as possible to ensure that compliance samples are representative of water quality consumed throughout the year as required by <i>Regulation 13(8) of the European Union (Drinking Water) Regulations 2023 (S.I. 99 of 2023)</i>.</li><li>5. Ensure that all regulated private supplies are monitored for compliance (a) at their required frequencies in accordance with the requirements of the <i>European Union (Drinking Water) Regulations 2023 (S.I. 99 of 2023)</i> and (b) for turbidity (where there is a surface water source) and nitrite at the water treatment plant (WTP). Regarding nitrite, where there is no chloramination treatment, sampling at the WTP is at the Group B sampling frequency.</li><li>6. Ensure data on regulated private water supplies entered into the EPA's database, EDEN, is accurate and updated annually. The results of all Group A and Group B compliance samples required to be taken should be uploaded to EDEN to ensure there is no annual shortfall in compliance monitoring.</li></ol>