

Our reference: AE1/20/1131921

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01 December 2020

Dear Dymphna

PC21 BUSINESS PLAN – NI WATER SUPPORTING INFORMATION PROVISION – ANNEX A

1.0 Introduction

I acknowledge receipt of NI Water's additional information in support of Annex A submissions, received by DWI on 22 September 2020 for consideration for the PC21 Business Plan Investment Programme.

2.0 Annex As

Following the initial decisison assessment outcome, NI Water was advised on 03 September 2020 that two of the nine Annex As for Water Treatment Works schemes would be supported by DWI, as outlined in Table 1, together with the additional Annex A relating to Analytical Services.

Table 1

WTW Code	WTW Name	PC21 Project ID	Sub Programme Number	PC21 Period (Table 4.4)	Beneficial Use Date
W1302	Lough Fea	1111	04a	2023-24	31.03.24
W2514	Seagahan	1118	04a	2026-27	31.03.27

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3.0 Assessment Criteria

The additional information was requested from NI Water to enable DWI to make an informed decision in considering the water quality drivers required for support. The remaining seven WTWs were assessed under the same assessment criteria, as outlined below:

- Where proposed works are related to the implementation of best practice and optimisation of treatment against Bouchier and Badenoch recommendations for *Cryptosporidium* control.
- Where a High Risk has been identified in NI Water's Drinking Water Safety Plan and has associated actions identified within the Action Plan to mitigate the risk.
- Where a specific Action Plan is in place at a WTW for THM control or where identified works align with the overarching THM Strategy¹.
- Where necessary investment has been identified to improve water quality at a WTW during a DWI technical audit.
- Where a number of water quality events have occurred and DWI is satisfied that the cause is related to treatment deficiencies requiring investment.

WTW Code	WTW Name	PC21 Project ID	Sub Programme Number	PC21 Period (Table 4.4)	Beneficial Use Date
W1702	Altnahinch	1186	04a	2022-23	31.03.23
W4306	Caugh Hill	2020	04a	2026-27	31.03.27
W2509	Clay Lake	1084	04a	2025-26	31.03.26
W4501	Derg	1927	04a	2024-25	31.03.25
W3801	Drumaroad	1664	04a	2026-27	31.03.27
W1303	Dungonnell	1550	04a	2021-22	31.03.22
W4701	Killyhevlin	1073	04a	2026-27	31.03.27

It is noted that not all the criteria need to be met for DWI to support the proposal.

4.0 Decision Assessment

A detailed Decision Assessment was undertaken based on the information provided within and in support of each Annex A. A summary of the outcomes is attached in **Appendix 1** to this letter and DWI's detailed assessment for each Annex A, together with NI Water's response to DWI's request for additional information is provided in **Appendix 2** to this letter.

¹ NI Water's Strategic Approach for Improving THM Compliance (October 2018). **Sustainability** at the heart of a living, working, active landscape valued by everyone.





5.0 General Observations

As outlined in my previous letter of 03 September 2020, it is noted that THMs has been identified as a parameter of concern for NI Water at seven of the nine WTWs under consideration. Specific THMs Action Plans are in place for four of these works, but NI Water has reduced its THMs overall compliance target. DWI do not support the reduction of any water quality targets.

NI Water provided clarification to justify the change to its internal target for THMs compliance from 75µg/l to 50µg/l in 2018 through reference to its *Strategic Approach for Improving THM Compliance* document. Where THMs has been identified as High Risk within the DWSPs, it is assessed against the company's Internal Standard of 50µg/l and not the regulatory standard of 100µg/l. The likelihood of THMs increasing in distribution is realised and therefore a lower limit leaving the WTW is accepted to manage the risk at the consumers' tap.

The projected output dates as contained in Table 4.4 of the Business Plan appear to indicate 'end on' loading in the proposed WTWs programme, with some nine projects not commencing until 2026-27.

Discussions have indicated that NI Water may require support for investment at NI Water Alpha sites. In a similar approach, where this is required, the necessary Annex As should be submitted for consideration.

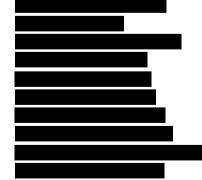
Should you have any queries in relation to this letter, please do not hestiate to contact Colin Clements or myself on 028 90569242 / 028 9069294 or by e-mail at <u>dwi@daera-ni.gov.uk</u>.

Yours sincerely

Cateina Davis

Catriona Davis Chief Inspector of Drinking Water Drinking Water Inspectorate

Cc:



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