

Annex – IL 03/2022

	IL section	Question	Response
1	3.4 All companies are required to submit an update of the risk assessment submission under Information Letter 05/2021. The updated submission should include additional detail on the sections in this Information Letter where these were not covered in the December 2021 submission. The additional submission should be emailed to DWI.RA.AuditTeam@defra.gov.uk no later than 31 August 2022.	Does this mean just the methodology, or all catchment risk assessments?	Just the methodology which covers PFAS (either as a stand-alone or part of the overall WSP/regulation 27 methodology).
2		Is there a deadline to submit regulation 28 reports for catchments which have been refined based on IL 3/2022?	No. Initial risk assessments should have already identified most high-risk sites/sources. We would expect those risk assessments to be subject to refinement first. It is appreciated that companies may have a backlog of regulation 28 report submissions, therefore updates are expected to be submitted as soon as reasonably practicable and in order of risk prioritisation.
3		Annex C of the Direction – ‘DWI - parameter codes consolidated list -	Currently no. All PFAS data should be submitted

		including Raw Water monitoring'. Column D PFAS parameter are only set up as Raw "R", should this be Raw and Treated "R/T".	within <b>raw water</b> monthly data submissions.
4	<p>3.1 Raw and final water samples for PFAS should be submitted with monthly compliance returns under the Water Industry (Water Suppliers') Information Direction 2021 (the Info Direction 2021) as per the format specified in <a href="https://cdn.dwi.gov.uk/wp-content/uploads/2020/11/24102412/03-2019_AnnexB.pdf">Annex B</a> (https://cdn.dwi.gov.uk/wp-content/uploads/2020/11/24102412/03-2019_AnnexB.pdf).</p> <p>PFAS results must be submitted with the units of micrograms per litre (µg/L), as specified in Annex C of this Information Direction <a href="https://cdn.dwi.gov.uk/wp-content/uploads/2020/11/24101204/0409AnnexB_240322.xls">Annex C</a> (https://cdn.dwi.gov.uk/wp-content/uploads/2020/11/24101204/0409AnnexB_240322.xls)</p>	Should PFAS data be sent in a separate monthly table or included within the raw water monthly table?	<p>PFAS data submissions can be sent in a separate table or within existing raw water monthly submissions. All submissions must follow the format specified in the Water Industry (Water Suppliers') Information Direction 2021 Annex B.</p> <p>We are expecting all raw water PFAS samples to be taken at locations with abstraction point site references "a-codes". For any other sampling point used as a raw water sample surrogate, and for treated water samples:</p> <ol style="list-style-type: none"> <li>1) When a non a-code sampling point is used as a surrogate, the a-code must be used as the site reference in site reference field. The site code of the point where the sample was taken should be entered into the comments field.</li> <li>2) When a blending point is used as a surrogate, again an a-code must be</li> </ol>

			<p>used as the site reference in the site reference field. Include one row for each a-code that is used in the blend (repeating the sample result). As blending points do not have a site reference, enter the word 'BLND' into the comments field.</p> <p>3) When a treated water sample is taken, the relevant a-code should be entered into the site reference field. In the comments field enter the t-code plus the word 'TRTD'. When there are multiple relevant abstraction points, include one row for each a-code (repeating the sample result).</p> <p>4) When the method of analysis for a test is not accredited, enter 'NAC' in the CoSampleRef field.</p> <p>5) When the method of analysis for a test is accredited, enter 'YAC' in the CoSampleRef field.</p> <p>6) Other information other than that listed in 1 – 4 above can still be entered into the comments and CoSampleRef fields.</p>
5		When should monthly returns	7 October.

		commence?	We appreciate that there may not be any new data to that submitted on 16 September.
<b>6</b>		For Treated Waters should we report against the WTW “T ref” or the Supply Point “S ref”?	See 4 above.
<b>7</b>		Should we report a PCV flag at greater to or equal to 0.1 µg/l?	Equal to 0.1 µg/L and over.
<b>8</b>		How do we account for non-accredited tests?	See 4 above.
<b>9</b>		When should we start reporting ≥0.1 µg/L as events?	From now on.
<b>10</b>		There is a requirement for repeat samples of a tier 3 result to be fast tracked. Is this necessary?	Yes. We would expect these repeat samples to be completed more quickly than other samples that are not expected to breach tier 3 concentration.
<b>11</b>		Are the triggers for each tier based on individual PFAS compounds or the sum of the compounds detected, total PFAS?	Individual PFAS.
<b>12</b>		What is meant by ‘sludge to land’ as a possible source of PFAS?	This includes waste water works sludge and to a much lesser extent treated water works sludge, when applied to land, as processes which concentrate PFAS.
<b>13</b>		What are the specific requirements of NAVs?	NAVs were not required to send in WSP methodologies or regulation 28 reports in response to the previous PFAS

			<p>Information Letters.</p> <p>The Inspectorate now requires NAVs to incorporate the outcomes of their incumbent companies' WSPs into their methodologies and regulation 28 reports.</p> <p>The deadline for NAVs to submit their methodologies is the RAR annual submission date of 21 October 2022. As for water companies, we expect regulation 28 reports to be submitted as and when they are reviewed against methodologies.</p> <p>Consumer tap samples are not a requirement, however we can see the merit in sampling in some circumstances, such as when there is a blend of water from two or more incumbent companies.</p> <p>Sampling is not a requirement and may not provide added value if the incumbent company/ies have an appropriate sampling programme.</p>
--	--	--	--

			<p>There could be additional sources of PFAS in zones, and from premises. For example, contaminated land and backflow from industrial premises or firefighting locations and airfields. These should be considered as part of regulation 27 risk assessments and included within the risk assessment methodology and reporting. Where risks exist at the distribution and/or consumer stages, sampling at consumer taps is an appropriate validation procedure for the identified risks.</p>
--	--	--	--