

Timing for Drinking Water Quality Management Plans



Act specifies timeframes for **approved** DWQMPs:

Large Drinking Water Service Providers (> 25,000 connections) - 1 July 2011

Thanks to Wivenhoe - Cressbrook Pipeline:

- Drinking water service provider that is a water storage owner into which is supplied recycled water for the purposes of augmenting drinking water supply – prior to the supply of recycled water
- Drinking water service provider that sources water from the above storage, or is supplied water from the above storage – prior to the supply of recycled water
- Regulator has the power to require an approved plan prior to the above dates if it reasonably believes that continued operation of the service may have an adverse effect on public health
- November 2009: Notified of QWC requirement for approved plans by end 2010 = August 2010 submission to the Regulator

Implications for Toowoomba Regional Council



- 1. Regulator requires a single DWQMP per Water Service Provider. TRC is the Water Service Provider for the purposes of the Act.
- 2. TRC has 20 separate drinking water schemes each requires a separate subplan.
- 3. Each water supply scheme sub-plan must address raw water (including catchments), treatment and pumping and distribution.
- 4. Not possible to complete and submit a DWQP covering all of TRC's drinking water schemes by 30 July 2010 to meet QWC requirements.
- 5. Virtually impossible to submit plan by end December 2010 to meet legislated requirement (Need to allow minimum 6 months for DERM approval process).

Negotiated Approach



Negotiated with the Office of the Water Supply Regulator to determine a mutually acceptable process:

- 2 part submission
- Part 1 to address all water treatment plants sourcing water from Cressbrook Dam and therefore potentially impacted by the addition of PRW to Wivenhoe Dam
- Part 1 to be submitted to the regulator by 30 July 2010
- Part 2 to address all remaining water supply schemes and pumping and distribution systems for schemes partially addressed under Part 1
- Part 2 to be submitted to the regulator by 31 August 2011
- Submission of Part 2 DWQMP to be included as an improvement action under Part 1 DWQMP.

Negotiated Approach



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Drinking Water Supply Scheme	Catchment & Dams (Raw Water)	Treatment	Pumping & Distribution (Transmission)
Toowoomba Mt Kynoch WTP	Part 1	Part 1	Part 1
Cressbrook WTP	Part 1	Part 1	Part 1
Highfields WTP	Part 1	Part 1	Part 2
Hampton WTP	Part 1	Part 1	Part 2
Crows Nest WTP	Part 1	Part 1	Part 2
Perseverance WTP	Part 1	Part 1	Part 2
Greenmount	Part 2	Part 2	Part 2
Cambooya	Part 2	Part 2	Part 2
Hodgson Vale	Part 2	Part 2	Part 2
Vale View	Part 2	Part 2	Part 2
Wyreema	Part 2	Part 2	Part 2
Clifton	Part 2	Part 2	Part 2
Nobby	Part 2	Part 2	Part 2
Haden	Part 2	Part 2	Part 2
Millmerran	Part 2	Part 2	Part 2
Pittsworth	Part 2	Part 2	Part 2
Cecil Plains WTP	Part 2	Part 2	Part 2
Yarraman WTP	Part 2	Part 2	Part 2
Oakey (Oakey RO WTP)	Part 2	Part 2	Part 2
Goombungee WTP	Part 2	Part 2	Part 2

Status – Part 1 Drinking Water Quality Management Plan



- Part 1 DWQMP submitted 26 July 2010
- DERM Drinking Water Quality Management Guidelines issued September 2010 Part 1 DWQMP assessed against guideline, even though not finalised or published at time of submission
- Detailed information request:
 - 1. Additional information for guideline compliance
 - Contrary to earlier advice, 3rd party certified HACCP plan not accepted as compliant. Risk assessment methodology disagreement
- Negotiated Part 2 submission extension due to extent of information request
- Information request response forwarded 1 February 2011
- Negotiated acceptance of Part 1 risk assessment methodology, subject to update to Part 2 methodology at first review.
- Part 1 DWQMP approved 29 June 2011 first DWQMP approved under the Water Supply (Safety and Reliability) Act 2008

Status – Part 2 Drinking Water Quality Management Plan



- Revised Part 2 DWQMP submission date 31 December 2011
- Risk assessment methodology agreed with DERM.
- Part 2 comprising of 22 Plans was submitted on the 5th January 2012 (due to Public Holidays).





- TRC was confident Part 1 would pass as it was a HACCP 3rd party certified system running for about 5 years.
- The part 1 submission developed before the guidelines were officially released.
- The DWMP team continued developing management plans based on the part 1 submission.
- Devastated when we were told part 1 didn't meet the guidelines.



- The Clifton story.
- Clifton DWMP is now up to version 17.
- The DWMP team will be happy never to see Clifton DWMP.
- The number of version were due to feedback received from DERM about the Part 1 submission.
- Resulting in changes to our methodology, set out of the risk assessment, what was included in the risk assessment.
- Splitting of Bore from a group to individual bores.



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Knowing your scheme.





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Knowing your scheme.





- We wrote these plans for our operational staff.
- We toured and talked to the operational staff.
- We involved the operational staff in the risk assessment workshops.
- We expect the operational staff (in time) to take the lead in reviewing and updating these plans
- For some it is a massive shock, but we expect these plans will become a normal part of the workplace over time.



- Key outcomes for TRC
- TRC has a documented description and understanding of it's Water Schemes, including flow charts, maps, water quality tables.
- TRC has a list of high risk items that will be addressed.
- TRC has confidence in the Water supplied.
- TRC has captured knowledge that might otherwise be lost.



- Key learning points for TRC
- Work with DERM early on
- Set the risk assessment methodology and template
- Do the most common scheme first, spend the time getting it right and take it to DERM for comment. It will save a lot of rework later on.
- Expect additional information requests, in fact expect additional information request on additional information requests.
- It a long road, hard road but it is well worth the effort, in fact I used to look like this before I started.



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