

Proposed changes to Level 3 Chemical Monitoring Rules

Where we propose a change to the rule type and reporting and compliance periods, we have made the **text red** to signify the change.

Existing Rule number	Existing requirement	Existing parameter	Proposed rule Number	Proposed requirement	Proposed parameter	Explanation	Question	Cost implications
N/A	N/A	N/A	T3.CH.1	Any chemical dosed into the drinking water supply must be demonstrated to be safe for use in drinking water by either— (a) a certificate of analysis for each batch used including the following information: (i) an analysis of all chemicals and potential impurities in the product: (ii) the purity of each chemical by mass or volume (ppm, concentration or percentage); or (b) a certificate of compliance to the agreed chemical standard.	Assurance CP: 1 Year RP: 1 Year	We propose adding a new rule that would require suppliers to demonstrate that any chemical dosed into drinking water is safe for use. This rule is intended to ensure that suppliers know the quality of the chemicals they are using.	Do you agree with the proposed requirements for suppliers to demonstrate that chemicals dosed into drinking water are safe for use? Will meeting the requirements of this proposed rule create challenges for your organisation?	Small costs possible for some supplies.
Section 4.10.3	In the first 12 months of monitoring,⁵⁹ 15 samples must be taken over a 12-month period (with no more than two samples collected in any calendar month) to determine the range of values for determinands in water leaving a treatment plant. Values must be identified for determinands in the water leaving the treatment plant if: 1. the determinand has a MAV; <i>and</i> 2. the determinand is: a) present in the source water at a concentration more than 50% of its MAV (as determined by the supply source water risk management plan); <i>and/or</i> b) a chemical added during treatment, or a possible contaminant in a treatment chemical; and/or	N/A	T3.CH.2	(a) A schedule of all chemicals that are used for treatment in the drinking water supply must be prepared. (b) The schedule must identify which of those chemicals have a MAV.	Assurance CP: 1 Year RP: 1 Year	Currently, suppliers must carry out testing in the first twelve months of sampling to determine whether specified chemicals used in treatment have standard or elevated values. This testing is carried out to determine a supplier’s monitoring regime. We propose: - consolidating a rule and related material into a single rule - removing the requirement to carry out testing for twelve months to determine typical or elevated values of chemicals - requiring suppliers to create a schedule of all chemicals	Do you agree with this proposed rule requiring preparation of a schedule of chemicals used in treatment?	Small costs for suppliers to prepare the required schedule. We do not anticipate this will require external expertise.

T3.93 Table 33	T3 Treatment Chemical Determinand Minimum Sampling Frequencies Minimum Sampling frequency: Standard typical range determinands (typical value <50% MAV) Annually Elevated typical range determinands (Value range 50% - 100% MAV) Monthly	Monitoring CP: 1 Month RP: 1 Year				chemicals they use in the treatment process that have a MAV, and any chemicals that may be formed in the treatment process (except for chlorine and fluoride). We are proposing this change as the concentration of a treatment chemical can change depending on the quality of the source water or changes in the treatment process. Annual monitoring would not identify these changes. We also propose: - changing this rule from an assurance rule to a monitoring rule - increasing reporting frequency from annually to monthly. This responds to feedback we have received from some suppliers that reporting more frequently would reduce the burden of annual reporting by spreading analysis and reporting throughout the year.		There may be an increase in costs for some suppliers from the requirement to monitor monthly all chemicals used for water treatment and chemicals that form in the treatment process. There will be a decrease in annual reporting requirements.
Table 34	T3 Possible Treatment Chemical Determinand Monitoring <i>Treatment chemical:</i> Aluminium based coagulants/flocculants <i>Determinand to monitor:</i> Aluminium, antimony, cadmium, copper, chromium, lead, mercury, nickel <i>Treatment chemical:</i> Iron based coagulants/flocculants <i>Determinand to monitor:</i> Antimony, cadmium, copper, chromium, lead, mercury, nickel <i>Treatment chemical:</i> Polyacrylamide (polyelectrolyte) <i>Determinand to monitor:</i> Acrylamide <i>Treatment chemical:</i> EP-DMA (polyelectrolyte) <i>Determinand to monitor:</i> Epichlorohydrin <i>Treatment chemical:</i> Ozone <i>Determinand to monitor:</i> Bromate <i>Treatment chemical:</i> Permanganate <i>Determinand to monitor:</i> Manganese	N/A						
Table 34 Footnote 63	Monitoring is only required for treatment chemicals that are used or formed in a treatment process.							
4.10.3	Typical Value Range A drinking water supplier must sample the water leaving a treatment plant to determine the typical value range for specified chemical determinands to identify if any values exceed the MAV in the Drinking Water Standards and to determine the on-going monitoring frequency							

T3.93 Table 33	T3 Treatment Chemical Determinand Minimum Sampling Frequencies Minimum Sampling frequency: Fluoride Continuous	Monitoring CP: 1 Day RP: 1 Year	T3.CH.6	If fluoride is added as part of the treatment process, it must be monitored continuously after the fluoride chemical is fully mixed.	Monitoring CP: 1 Day RP: 1 Month	This proposed rule consolidates a rule and a footnote into a single rule.	N/A	N/A
Table 33 Footnote 61	If fluoride is added as part of the treatment process.							
T3.96	Event based monitoring (determined by the water supplier) must be undertaken for any event that may rapidly introduce high concentrations of health-significant chemical determinands into the water at the source or at the treatment plant.	Monitoring CP: 1 Year RP: 1 Year (Sampling frequency is event based)	N/A	Removed	N/A	We propose removing this rule as event-based monitoring should be part of a response to an event and set out in the supply Drinking Water Safety Plan. Events that could adversely affect the supply need to be managed by a supplier and any professional advice they engage but the nature and extent of monitoring needs to be determined at the time and in relation to the event.	Do you agree that the requirement for event-based monitoring should be removed from the Rules and managed by the supplier on a case-by-case basis?	Neutral
T3.95	Containers used for collecting samples must be obtained from a laboratory and appropriate for the target determinand.	Assurance CP: 1 Year RP: 1 Year	N/A	Removed	N/A	We propose removing this rule as laboratories will advise water suppliers on correct sample containers. We note that G.SM.3 sets out requirements for analysis and collection of water samples.	N/A	N/A