Irish Water

Technical Standards

REMOTE ASSET MANAGEMENT (RAM) POLICY

Water Treatment

Fluoridation

Document Number: IW-RAM-SPEC-5020-009

Document Revision: 1.0



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1.0 INTRODUCTION

1.1 OBJECTIVE

The objective of this document is to define the business requirements for telemetry information (referred to as information in the rest of this document) for fluoridation processes.

This policy sets out how assets will be monitored in respect of:

• Alarm Response

The actions arising from a set of "abnormal" conditions which require intervention/remedial actions within prescribed timescales.

• Performance Measures

A range of parameters against which the performance of an asset may be assessed and upon which interventions will be taken to improve overall business performance.

1.2 SCOPE

This document defines the asset type/purpose and the operating conditions to which the business needs to respond in order to meet its obligations to health and safety, business efficiency, our customers and the environment.

Where information should meet specific quality criteria (e.g. must be calibrated to "X standard" for external reporting purposes) it will be captured within this policy.

1.3 INTENDED AUDIENCE

The Remote Asset Management (RAM) policy for any asset/process defines the information required not only to determine the Alarm Response but also that required for reporting purposes (Performance Measures). The latter could well apply to the collection of information for external reporting e.g. Strategic Flows to EPA/CER etc.

RAM policies therefore apply to any consumer of information and are not constrained to any particular business user. As such, any business function/department having a requirement for information derived remotely from the company's assets are stakeholders in the associated RAM policy and their requirements form an integral part of the policy definition process.

1.4 REFERENCE DOCUMENTS

The following documents have been used for reference in the development of this policy document:

| Document | lssue No. | Date | Author |
|----------|-----------|------|--------|
| | | | |
| | | | |

1.5 CHANGE HISTORY

This document has been subject to the following changes/revisions:

| Date | Issue | Nature of Change | Sections Affected |
|------------|-------|---|-----------------------|
| 05/04/2016 | 0.1 | Draft for review at Workshop | |
| 17/06/2016 | 0.2 | Meeting Amendments incorporated Final version for approval | |
| 05/07/16 | 0.3 | Final Version including comments | See collated comments |
| 19/07/2016 | 1.0 | Amended to Rev 1.0 issued to doc control for approval | Cover page |

2.0 PROCESS DESCRIPTION

2.1 PROCESS OBJECTIVE

2.2 PROCESS DIAGRAM

The fluoridation process is designed to raise the naturally occurring level of fluoride in the water supply up to a level of 0.6 - 0.8 mg/l as defined by the Regulations made under the Health (Fluoridation of Water Supplies) Act. This document covers the addition of the chemical hydrofluosilicic acid in order to achieve fluoridation. In this document the dosing of hydrofluosilicic acid is referred to as "fluoride dosing" or "fluoridation".

Fluoridation is undertaken on behalf of and at the request of the Health Service Executive who also fund this treatment.

Irish Water's undertaking of the provision of fluoridation must adhere to the relevant legislation and also have regard to the guidance contained in the Code of Practice on the Fluoridation of Drinking Water.

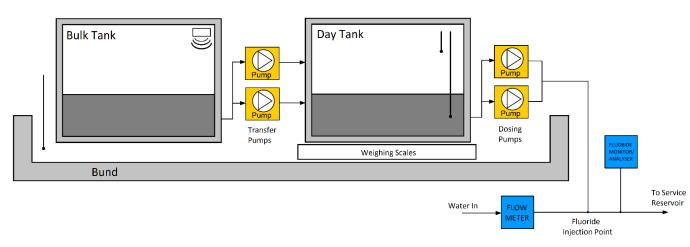


Figure 1 – Chemical Dosing - Fluoride

2.3 PRIMARY DESIGN

The assumption in this policy is that the fluoride dosing rig comprises of

- Bulk storage for concentrated acid
- Transfer system to a "day tank" (including weighing scales, pumps and 'dead man's handle' type operation)
- Duty Standby Dosing System
- Fluoride monitor

The following abbreviations are used in the table:

- DI Digital Input
- AI Analogue Input
- PI Pulsed Input
- DO Digital Output
- AO Analogue Output

| Primary Design - Chemical Dosing - Fluoride (CDF) | | | | | | | | | | |
|--|----|----|----|----|----|--|--|--|--|--|
| Signal Name | DI | Al | PI | DO | AO | Comments | | | | |
| Bund High | Х | | | | | | | | | |
| Bulk Tank Level | | Х | | | | | | | | |
| Bulk Tank Level Instrument Failed | Х | | | | | | | | | |
| Dosing System Partial Fault | Х | | | | | Transfer or Dosing pump failed or day tank mixer failed | | | | |
| Fluoride Concentration | | х | | | | | | | | |
| Fluoride Concentration Instrument Condition | Х | | | | | | | | | |
| Plant Shutdown | Х | | | | | | | | | |
| 'Dead man lever' for day tank filling operated | х | | | | | Check with tank level signal to determine nature of fault | | | | |
| Weighing scales Load Cell | Х | | | | | Can be used to determine rate of change where no level sensor | | | | |

2.4 CONSEQUENCE OF FAILURE

Our response to alarms for a process is based around the consequence of failure (COF) of the process to achieve the desired objective. Generally, where the consequence is severe, we will respond faster than if the consequences are minor; this is the essence behind the risk based approach to alarms defined within this policy. We use a High, Medium and Low (H/M/L) categorisation for the consequence of failure.

For fluoridation systems the COF is dependent upon:

- Health and Safety of Treatment Plant Operator
- Provision of Fluoride monitor on site
- Health and Safety of Irish Water Customers
- Protection of the Environment
- Irish Water obligation to fluoridate drinking water

The categorisation of High, Medium and Low will be carried out in accordance with Irish Water's asset assessment tool whereby the consequences of the asset failure will be assessed against five number criteria. These criteria are:

- (i) Number and sensitivity of customers impacted by the asset failure;
- (ii) The ease of repairing the asset post failure;
- (iii) The reputational damage incurred by Irish Water as a result of the asset failure;
- (iv) The environmental damage that would be caused by the asset failure;
- (v) And the financial cost associated with the failure (including repair costs, fines, compensation, etc.)

| COF | Definition |
|--------|--|
| High | Environmental damage due to hydrofluosilicic acid spill. Dosing direct to network with no in line monitoring No on-line (continuous) Fluoride monitor on site Risk of Injury to operating personnel |
| Medium | |
| Low | Small number of customers affected by failure (cessation) of fluoridation |

The performance measures developed as part of this policy are to be used to support periodic and ad hoc reviews of the COF value. This review process will be used promote processes/sites both upward and downward to support the balance of cost and risk.

2.5 ALARM RESPONSE SUMMARY

The main principles of the alarm responses provided in tables in Appendix A, are as follows:

- An urgent response is required for possible chemical leakage/ overdosing
- We shall attend non critical dosing system failures within 1 week for high CoF or next visit for low CoF dosing systems.
- Loss of service will be responded to on the Next Working Day
- A risk assessment must be carried out to ensure adequate controls are in place when responding to alarms, to protect the responder and the public.

3.0 ASSET OPERATION - ALARM RESPONSE

The alarm response tables in Appendix A define the required business response, in terms of timescales and personnel required, for each site condition and consequence of failure.

The response tables defined in Appendix A have been completed using the standard column headings below.

ID – A unique identifier for each condition which may occur on site

Plant Condition – A description of the plant condition e.g. one blower failed

- Dry/Storm & Winter/Summer This item recognises that there may be other factors which could modify the alarm response for a particular condition e.g. Dry Weather Flows (DWF) and Storm conditions may require different responses or Winter and Summer conditions may require different responses.
- Wait (Mins) A time delay which can be applied to each condition before it is presented as an alarm, maximum entry value 360 minutes

Recipient – The recipient of the alarm, chosen from:

- Site Owner / Manager
- Field Operator / Caretaker
- OMC (Control Room)
- Maintainer (Mechanical)
- Maintainer (Electrical)

Intervention – This is the action required to be undertaken

Time to Clear - This is a fixed value assigned to the alarm and is the company's "target" for the time to clear 'simple faults'. More specifically it can be regarded as the time from the annunciation of the alarm (which is post the wait period) to completion of initial investigation on site and fixing of simple faults or logging a follow-up job.

Values to be chosen from:

| ABBREVIATION | ALARM CATEGORY | DUE TIME |
|--------------|---------------------------|----------|
| Imm | Immediate - Critical | 1 hr |
| SD-U | Same Day – Urgent | 3 hr |
| SD-BE | Same Day – Best Endeavour | 6 hr |
| ND | Next Day | 1 day |
| NWD | Next Working Day | 3 days |
| NW | Next Week | 7 days |
| NV | Next Visit | 30 days |

- High CoF, Medium CoF, Low CoF These are included as sub-headings under the heading of Time to Clear, because the required Time to Clear for a particular condition may vary depending on the Consequence of Failure (COF). See section 2.5 for description of COF levels.
- **SOP** Where a specific "Standard Operating Procedure" is applicable, enter the SOP number/ID.
- **Comments / Assumptions** Where required, state the rationale or assumptions made for the alarm response

4.0 ASSET MANAGEMENT REQUIREMENTS – PERFORMANCE MEASURES

The asset performance tables in Appendix B define the measures by which the performance of the asset / process type shall be measured. These measures shall be applied across the business thus ensuring that appropriate reports can be generated to highlight performance issues and / or facilitating comparisons of similar assets.

The performance measures tables defined in Appendix B have been completed using the standard column headings below.

ID - A unique identifier for each condition which may occur on site.

Signal – The measure from site.

Measure - Defines what pattern of conditions or events are required to generate our report.

Frequency - How often does the measure need to be reviewed?

- Event or
- Periodic Daily(D), Weekly(W), Monthly(M), Quarterly(Q), Annually(A)
- Recipient The recipient of the Report or Exception Notification
 - Work Management/Work Flow
 - OMC
 - Site Owner/Manager
 - Compliance
 - Optimisation

Intervention – The action required following issue of the report.

Signal Criteria - Any quality criteria related to the signal, for example:

- Analogue:
 - Limits of measure
 - Accuracy +-%
 - Decimal Places
- Digital:
 - 'Time stamp to the nearest second'
- Count:
 - 'To the nearest unit'

Comments / Assumptions - For comments and/or specific signal quality parameter.

APPENDIX A – ALARM RESPONSE TABLE

| Alarm Response Table | | | | | | | | | | | | | |
|---------------------------|---|---------------------|----------|----------------------------------|-----------------------------------|-------------|------------------------------|------|-----|--|--|--|--|
| Proc | cess/Asset Type | | Chemica | Chemical Dosing - Fluoride (CDF) | | | | | | | | | |
| Process/Asset Description | | | Fluoride | Fluoride Dosing | | | | | | | | | |
| ID | Site Condition | DWF or Storm | Wait | Posiniant | | | Time to Clea | r | 005 | Comments / | | | |
| U | Sile Condition | Summer or Winter | (Mins) | Recipient | Intervention | High CoF | High Medium Lo CoF CoF Co | | SOP | Assumptions | | | |
| 1 | Day Tank Rate of Change (Falling) | | 5 | Caretaker | Attend & Resolve | SD-U | | SD-U | | Level Sensor in place Could also be calculated from day tank weight and dosing pump hours run. This may indicate leak from tank or potential overdose | | | |
| 2 | Chemical Order Alert | | 15 | Caretaker | Order Chemicals | NWD | | NWD | | Set at X days storage in the bulk tank | | | |
| 3 | Bulk Tank Level Low | | 15 | Caretaker | Check Chemical Delivery Status | NWD | | NWD | | Set at Y days storage in the bulk tank | | | |
| 4 | Bulk Tank Level Sensor Fault | | 15 | Caretaker | Attend & Resolve | NWD | | NWD | | | | | |
| 5 | Dosing System Partial Fault | | 15 | Caretaker | Attend & Resolve | NW | | NV | | This is a non-critical plant fault such as Transfer or Dosing pump failed or day tank mixer failed | | | |
| 6 | Fluoride Concentration High (automated on- line fluoride monitor at plant) | | 5 | Caretaker/ Regional Ops | Attend & Resolve | SD-BE | | NWD | | Overdosing will shut fluoridation plant down. Check shutdown signal Any overdose is a notifiable incident | | | |
| 7 | Fluoride Concentration | | 15 | Caretaker | Attend & Resolve | NWD | | NW | | Obligation not being | | | |

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| Alarm Response Table | | | | | | | | | | | | | |
|---------------------------|--|---------------------|----------|----------------------------------|------------------|-------------|------------------------|------|-----|--|--|--|--|
| Proc | cess/Asset Type | | Chemica | Chemical Dosing - Fluoride (CDF) | | | | | | | | | |
| Process/Asset Description | | | Fluoride | Fluoride Dosing | | | | | | | | | |
| ID | Site Condition | DWF or Storm | Wait | Recipient | Intervention | | Time to Clea | 1 | SOP | Comments / | | | |
| | | Summer or Winter | (Mins) | Recipion | | High CoF | ligh Medium CoF CoF | | | Assumptions | | | |
| | Low (automated on- line fluoride monitor at plant) | | | | | | | | | met | | | |
| 8 | Fluoride Concentration Instrument Failed (automated on-line fluoride monitor at plant) | | 5 | Caretaker | Attend & Resolve | SD-BE | | NWD | | This will shut fluoridation plant down automatically to avoid overdose Check shutdown signal | | | |
| 9 | Fluoridation Plant Shutdown | | 15 | Caretaker | Attend & Resolve | NWD | | NW | | Critical Plant Fault has occurred | | | |
| 10 | Fluoride High or Instrument Failed - Fluoridation Plant still running | | 5 | Caretaker | Attend & Resolve | SD-U | | SD-U | | This may cause potential overdose | | | |
| 11 | Bulk Tank Rate of Change (Falling) | | 5 | Caretaker | Attend & Resolve | SD-U | | SD-U | | Only alarm if day tank is not being filled manually (signal from 'dead man's lever where available or Check day tank signal for rate of change rising') | | | |
| 12 | Bund High | | 5 | Caretaker | Attend & Resolve | SD-U | | SD-U | | | | | |

APPENDIX B – PERFORMANCE MEASURES TABLE

| Sta | Standard Configuration Performance Measures | | | | | | | | | | |
|------------------------------|--|--------------------------------------|----------------------|---|---|----------------------------------|---|--|--|--|--|
| Pro | cess/Asset Type | Chemical Dosing - | Fluoride | | | | | | | | |
| Process/Asset Description | | Fluoride Dosing | | | | | | | | | |
| ID | Asset Signal | Measure | Frequency | Recipient | Action | Signal Criteria | Comments/ Assumptions | | | | |
| 1 | Bulk Tank Instrument Failed | Greater than 2/year | Event | Site Manager Regional Lead | Investigate high frequency event / instrument reliability or location | Count to nearest Whole Number | Regional Lead will have a rolled up view for their region i.e. number of sites in region | | | | |
| 2 | Fluoride Concentration High | Every occurrence | Event | Site Manager Regional Lead Compliance Asset Strategy | Investigate event / instrument reliability or location | Count to nearest Whole Number | Verify readings with a hand held colorimeter reading but also check the manually calculated Fluoride concentration (gravimetric method). | | | | |
| 3 | Fluoride Concentration Low | Greater than /month | Event | Site Manager Regional Lead Compliance Asset Strategy | Investigate high frequency event / instrument reliability or location | Count to nearest Whole Number | Verify readings with a hand held colorimeter reading but also check the manually calculated Fluoride concentration (gravimetric method). | | | | |
| 4 | Fluoride Concentration Outside Limits | Total Hours greater than 24/month | Event | Site Manager Regional Lead Compliance Asset Strategy | Diagnose and raise Job for caretaker or maintenance | Time Stamp 1 Minute | Over/under dosing may be occurring | | | | |
| 5 | Fluoride Concentration Instrument Failed | Every occurrence | Event | Site Manager Regional Lead | Investigate high frequency event / instrument reliability or location | Count to nearest Whole Number | | | | | |
| 6 | Fluoride Concentration Average | Total average Monthly /Annually | Monthly/ Annually | Site Manager Compliance Asset Strategy | Site comparison information | Value +/- 1.5% | For Regulatory Reporting | | | | |

| Standard Configuration Performance Measures | | | | | | | | | | | |
|---|---------------------------------------|---------------------|-----------|--|-------------------------------------|----------------------------------|---|--|--|--|--|
| Process/Asset Type | | Chemical Dosing - | Fluoride | | | | | | | | |
| Process/Asset Description | | Fluoride Dosing | | | | | | | | | |
| ID | Asset Signal | Measure | Frequency | Recipient | Action | Signal Criteria | Comments/ Assumptions | | | | |
| 7 | Fluoride Monthly Usage | Total average | Monthly | Site Manager | Site comparison information | Value +/- 1.5% | Investigate process problem if fluctuations (taking into account changes in water demand) | | | | |
| 8 | Fluoride Plant Shutdown | Every Occurrence | Event | Site Manager Compliance Asset Strategy | Investigate | Count to nearest Whole Number | high frequency event may indicate instrument reliability or location problem | | | | |
| 9 | Bund Operating | Greater than 2/year | Event | Site Manager | Investigate | Count to nearest Whole Number | high frequency event may indicate instrument reliability or location problem | | | | |
| 10 | Bulk Tank Rate of Change (Falling) | Every Occurrence | Event | Site Manager Regional Lead | Investigate high frequency event | Count to nearest Whole Number | May indicate leak | | | | |