

In the Leicester Magistrates' Court

Drinking Water Inspectorate

V

Anglian Water Services Ltd

Statements Bundle

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Official - Sensitive – When Complete

(Criminal Procedure Rules, r16; Criminal Justice Act 1967, s9)

Statement of:

Age of witness (if over 18 enter "over 18"):

Over 18

Occupation of witness:

Tactical Operations Manager

This statement, consisting of pages each signed by me, is true to the best of my knowledge and belief and I make it knowing that, if it is tendered in evidence, I shall be liable to prosecution if I have wilfully stated in it anything which I know to be false or do not believe to be true.

Signature:

Dated:

10/08/2022

My name is [REDACTED] I work full time for Anglian Water, Lancaster House, Lancaster Way, Ermine Business Park, Huntingdon, Cambridgeshire, PE29 6XU. At the time of the Hannington project I was a duty manager working in the operational management centre. I worked in this role from 2016 to 2019.

My training was peer to peer in the duty manager role, I came from the supply team and so I had a lot of experience on the water supply side of the business.

I recall that Hannington had been cleaned and refilled as part of preparations to put it back into service in April 2016. There then became an issue with the inlet valve passing when the site team tried to isolate it. The tank began to overflow and steps were taken to try and mitigate this. The drain valve was opened to try and reduce the water level as the inlet valve was still leaking. The duty scientist was involved with discussions on sampling to check the water quality and the issue was escalated to the tactical operations manager on standby at the time the issue was unfolding. There were discussion between the duty scientist and the tactical operations manager at the time of the incident. The duty scientist was looking for sample data to evaluate the risk assessment should we need to put the site into supply. I cannot recall the scientists name.

It was not treated as an incident at the time. I provided advice and guidance on what we would have to do if it needed to go into service. We would have throttled the outlet valve to reduce how much water would be going into service. The duty scientist was looking at the data and creating a sample plan so that if the site went into supply, on site and downstream samples could be collected in addition to field tests such as taste and odour checks.

There would have been an impact plan for the site to be brought back into service. Valve failure is not a normal situation that would have a mitigation plan pre prepared. The site technicians tried to do as much as they could. I am not aware of any contractors being brought in to assist the issue. The overflow from Hannington goes into a local brook. There is a lot of sensitivity about flowing into the brooks in this area.

I received approval from the duty scientist for the short term actions that would be taken for Hannington that evening allowing water to flow into supply. The site went into supply for a short period of time. Whilst I was on shift there were no issues associated with the site flowing into supply such as consumer contacts or failing samples. The leaking inlet valve was fixed by a local team at the time but I went off shift before Hannington was isolated from supply after the valve was fixed.

Signature:

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Continuation Statement of:

Statement of: [REDACTED]

[REDACTED]

Signature:

[REDACTED]

(Criminal Procedure Rules r16; Criminal Justice Act 1967 s9)

Statement of: Dr [REDACTED]

Age of witness (if over 18 enter "over 18"): Over 18

Occupation of witness: Strategic Supply Integration Scientist

This statement, consisting of 11 pages each signed by me, is true to the best of my knowledge and belief and I make it knowing that, if it is tendered in evidence, I shall be liable to prosecution if I have wilfully stated in it anything which I know to be false or do not believe to be true.

Signature: [REDACTED]

Dated: 18/07/2022

My name is Dr [REDACTED]. My job title is Strategic Supply Integration Scientist. I have worked for Anglian water since September 2005.

A) At the time of the capital work at Hannington, Diddington and Pitsford my job title(s) was XXXX. I was based at XXX.

The period of capital work at Hannington Service Reservoir, Diddington Service Reservoir and Pitsford Water Treatment Works Reservoir encompassed a significant timespan, which I understand to be at least 2013 to 2018. For simplicity I have listed the roles I have undertaken throughout my employment at Anglian Water (note that exact dates may be approximate), which commenced on 5 September 2005:

- 5 September 2005 to 26 February 2007: Network Scientist (AW Regional Quality team)
- 26 February 2007 to 1 January 2011: Supply Scientist (AW Regional Quality team)
- 1 January 2011 to 3 February 2014: Operational Scientist (AW Regional Quality team, within newly-formed team in AW Regional Quality team, following restructure)
- 3 February 2014 to 8 September 2014: Inspector (secondment) at Drinking Water Inspectorate
- 8 September to 1 December 2014: Operational Scientist (AW Regional Quality team)
- 1 December 2014 to 1 April 2016: Operational Development Scientist (secondment) in AW Regional Quality team
- 1 April 2016 to 9 October 2017: Risk Scientist (within newly-formed team in AW Water Quality team, following restructure)
- 9 October 2017 to 2 November 2018: Area Service Manager (secondment) in AW Water Supply Operations team
- 2 November 2018 to 1 September 2020: Risk Scientist (AW Water Quality team)
- 1 September 2020 to present: Strategic Supply Integration Scientist (Strategic Pipeline Alliance partner, as part of AW Strategic Delivery & Commercial Assurance team). Note the role includes providing the Risk Scientist responsibilities for the SPA projects

Throughout the above period and job roles my primary base was the Old Engineering Office at Pitsford Water

Signature: [REDACTED]

Continuation Statement of

Statement of: Dr [REDACTED]

Treatment Works (apart from for the Network Scientist role when I was based at Canwick WRC, and during my DWI secondment in 2014 when I was based in London). My actual work site was and continues to be in practical terms (both formally and informally) more often at offices on other operational sites in the region, main Anglian Water offices, and working from home. For example during my secondment to Area Service Manager I also had a desk available at Wing Water Treatment Works.

B) What did your role involve/what were your responsibilities at the time of the events?

Additional clarification: Please ask [REDACTED] to summarise his roles and responsibilities in relation to water quality throughout the period of the three schemes and his specific responsibilities for reg31 on each the schemes.

I no longer have copies available of the relevant Job Role Outlines for my previous roles, the below is based on my recollections:

- The Network Scientist role included no specific responsibilities relating to Regulation 31, focussing mainly on the customer-facing side of water quality.
- The Supply Scientist, Operational Scientist and Operational Development Scientist roles included no specific responsibilities relating to approval of products or materials for use in contact with potable water, or sign-off of the sample results following installation – this role was completed by the Water Quality Performance team. The only responsibility for Regulation 31 would have been a general responsibility to ensure water quality was maintained. The Supply Scientist role focussed mainly on water quality issues relating to water treatment, the Operational Scientist role amalgamated both treatment and distribution aspects of water quality, and the Operational Development Scientist role focussed on more regional water quality issues and projects.
- The DWI Inspector role included no specific responsibilities relating to Regulation 31, although I spent some time with the Reg 31 team during my secondment, and through formal and informal conversations gained additional knowledge of the importance of Reg 31 and the system from a DWI perspective. The role included time looking at all aspects of the inspectorate's work, including event and compliance investigations.
- The Risk Scientist role, brought in around April 2016 during a restructure, abruptly amalgamated the Regulation 31 responsibilities of the former Water Quality Performance team with the Treatment role of the Operational Scientist. The Risk Scientist role gained primary responsibility for approval of products & materials and sample sign-off, for all clean water schemes. I personally feel this abrupt transfer of responsibility to the newly-formed Risk team was an error on the part of those individuals leading the 2016 restructure, though I do not feel the restructure led specifically to the issues being investigated here. Away from Regulation 31, the Risk Science roles and responsibilities are based around non-reactive water quality aspects, including investigating non-regulatory sample exceedances, maintaining the various water quality risk assessments and registers, and reading/approving impact plans for planned work.
- The Area Service Manager role did not have any specific Regulation 31/MIC responsibilities, though I retained the Regulation 31/MIC responsibilities for the schemes I had picked up from the previous roles, due to efficiencies in myself retaining these aspects, and my prior knowledge of the schemes. During this period I continued to informally report to [REDACTED] (Water Quality Risk Manager), for any aspects of the schemes I had retained. The role focussed mainly on identifying and progressing optimisation and efficiency projects at assets within the Water Supply portfolio.

Signature: [REDACTED]

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Continuation Statement of: Statement of: Dr [REDACTED]

- My current Strategic Supply Integration Scientist role maintains the Regulation 31/MIC responsibilities of the Risk Science role, focussing on this and all other water quality aspects relating to the ongoing Strategic Pipeline Alliance (SPA) projects.

The responsibilities of the Risk Scientist role relating to Regulation 31/Materials in Contact are detailed within the related POSWSH document. I have not been able to locate a copy of the procedure dating from the time the Risk Science team was formed (and took over MIC responsibilities) in April 2016. The responsibilities list below dates from 7th December 2018, so may be slightly different to those in place at the time of some of the issues being investigated, but give an overview of the level of responsibility. It can be seen that Risk Scientist responsibilities in December 2018 were restricted to ensuring MIC forms are correctly filled out and signed off, any advice asked for is given, and that samples taken are compliant with approval given and the form signed off. I believe I correctly discharged these responsibilities for both the Hannington and Diddington tanks, for the periods I was involved in the schemes.

Water Quality Risk Scientist/Standby Scientist

- | | |
|----|---|
| 1. | Ensure MIC forms are issued as requested, and that the MIC form log and correspondence log spread sheet is updated accordingly.
<u>MIC Form Log and Correspondence Log</u> |
| 2. | Check that MIC forms are filled out correctly and approve materials for use as being compliant with Regulation 31. |
| 3. | Provide advice relating to Regulation 31 and advice on the appropriate sampling to be carried out. |
| 4. | Check and approve or complete Part B of the MIC form, detailing the type of sampling required and standing times. |
| 5. | Check and approve sample results as being compliant with the Regulations for use in public supply and that the materials have not impacted on water quality. |
| 6. | Check and approve sample results for water quality and confirm the samples taken are appropriate for the materials listed and that every product has been tested by signing part C of the MIC form. |
| 7. | Request resamples if and when required. |
| 8. | Provide final sample approval to allow the scheme to enter supply. |

C) Who did you report to at the time of the events (line manager name)?

My Line Managers are as follows:

- Network Scientist role: [REDACTED]
- Supply Scientist role: [REDACTED]
- Operational Scientist role: [REDACTED]
- DWI Inspector role: [REDACTED]
- Operational Scientist role: [REDACTED]
- Operational Development Scientist role: [REDACTED]
- Risk Scientist role (2016-2017): [REDACTED]

Signature: [REDACTED]

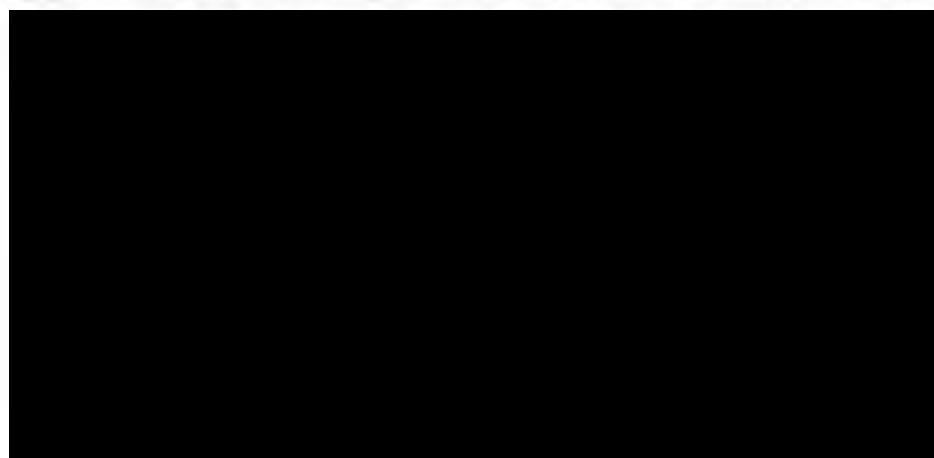
Continuation Statement of Statement of Dr [REDACTED]

- Area Service Manager role: [REDACTED]
- Risk Scientist role (2018-2020): [REDACTED]
- Strategic Supply Integration scientist role: [REDACTED]

D) Please provide the training you have received to carry out your role and any regulation 31 specific training carried out (before and after the reported events).

Additional clarification: Provide a summary of his professional qualifications (degree etc) and all relevant Regulation 31 training.

My main academic and professional qualifications (from degree level) are as follows:



Due to a reorganisation of the team and changes in role responsibilities completed in early 2016, responsibility for product/material sign-off moved from the Water Quality Performance team (within the Regulation team) to the newly-formed Risk Science team. A training session for the new Risk Science team was organised on Tuesday 26th April 2016, which I had been planning on attending, but unfortunately I was unable to attend [REDACTED]

[REDACTED] subsequently attended formal MIC training on 15th July 2016 (Water Quality Scientist Materials in Contact module). In the intervening period I received significant informal assistance during completion of my first MIC form (Form 2361 for Hannington service reservoir) from a member of the former Water Quality Performance team (see more detail below). The former Water Quality Performance team were also readily available for guidance for the first few forms completed.

Diddington service reservoir

1) Please provide an overview of the scheme at Diddington and your role in the approval of the material used on the scheme in relation to Regulation 31

The scheme at the Diddington site was part of the wider "Grafham resilience" scheme, to allow water to be moved more easily between the main strategic assets within the "Rutland/Grafham/Pitsford" area. The construction of a new strategic storage asset at a site next to Grafham Water Treatment Works was a key part of this work. I was assigned the role of leading on water quality aspects, having previously been involved in related resilience work on the trunk main network. My involvement in the Grafham Resilience Capital work spanned a period from June 2015, and continued until past the date of entry into supply of Diddington service reservoir in February 2018. From

Signature [REDACTED]

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Continuation Statement of: Statement of: Dr [REDACTED]

June 2015 to April 2016 I did not have responsibility for scientific approval of products/materials for the scheme. This responsibility transferred to my substantive (the newly-created Risk Science) role in April 2016, following transfer of Regulation 31 responsibilities from the former Water Quality Performance team to the Risk Science team. In practical terms the MIC form for the Diddington site did not begin to be completed until July 2016, with approval of products/materials continuing through 2016 and 2017 (until November 2017), as design and construction of the tank progressed.

2) Can you identify who was responsible for the inventory of materials used on the scheme?

The overall Grafham resilience scheme (including the construction and commissioning of Diddington service reservoir) spanned a period of multiple years, and for the purposes of materials approval was split down into various "Materials in Contact" (MIC) forms, each concentrating on a different site/asset. Over the time the forms were being compiled and the products/materials signed off, the person responsible person for completing the inventory changed. The names recorded on the form raised for the Diddington site (including the service reservoir, pumping station and all related pipework) are [REDACTED]. I believe the former two individuals worked for J.N.Bentley at the time, as part of the Alliance constructing the site. [REDACTED] was, and still is, an Anglian Water employee. I am not aware of the line management or upward responsibility within J.N.Bentley or Anglian Water at the time for these individuals.

3) Who else was involved in the materials approval process and what was their role?

I cannot recall any other individuals who had specific responsibilities in the materials approval process, although I had many conversations over the period of construction related to products/materials approval, with both Anglian Water and Special Projects alliance (including J.N.Bentley) staff. The Supply Manager would have had responsibilities relating to acceptance of the constructed asset, my recollections are that this would initially have been [REDACTED] (no longer an Anglian Water employee), moving to [REDACTED] at some point across the life of the project. My own Line Manager, from when I gained responsibility for product/materials approval for Diddington service reservoir in April 2016, was [REDACTED] (no longer an Anglian Water employee). I carried on reporting to [REDACTED] for the materials/products approval aspect of the project, even following my move to the Area Service Manager role in October 2017.

4) Please identify the materials in contact (MIC) form number and relevant lines on the form for the products used which were not approved for being in contact with water (or were coated with a non-approved product)

The MIC form number for the whole Diddington service reservoir site (including the service reservoir, pumping station and all related pipework) is form 2428. I have given scientific approval for all 201 lines on this form, of which 58 are recorded as being related to the Diddington tank (the remainder of the products/materials being related to the onsite pipework and other assets (e.g. pumping station)). I do not believe that any of the lines listed on this form were not approved for being in contact with water intended for potable supply, and all were signed off with relevant DWI or WRAS/KIWA/B56920 approval details. However, I now understand that listed on the form there were lengths of pipework that were approved for carriage of water but were instead installed in a position of total immersion (which negates approval). Although I carried out an initial site inspection at Diddington West SR in 2021 (see question 10 below), I have not since been closely involved in the subsequent investigations, so although I can make assumptions (e.g. only lines 1 and 2 on Part A of form 2428 are related to pipework not approved for total immersion), I cannot say with absolute certainty which are the relevant lines. I would like to note the type of issue found within this tank would

Signature: [REDACTED]

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Continuation Statement of

Statement of: Dr [REDACTED]

not have been highlighted by completion and approval of the MIC form, which simply provided approval details for products and materials to be in contact with water intended for potable supply, and did not give detail of exactly where the product/material was installed on the project.

5) Were you notified of any changes to the list of materials to be used on the scheme? (if so please provide further information)

The list of materials on the project was dynamic, and was updated regularly as the scheme progressed over the almost 18 months from approval of the first to the last product/material(s). I cannot recall specifically being made aware of any alterations to the list of materials, but many additions would have been made – as the form was built up incrementally as the scheme progressed. From a check of the form, there are more than 20 separate dates listed for addition of the 58 products recorded as being part of the Diddington tank, and I signed off products/materials for the asset on around 14 different dates (I would have checked and approved products/materials as and whenever I was informed by the project team that there was an update to the form). It was not a core part of my responsibilities to question changes to the form.

6) Is there a process or procedure to follow when contractors are changing materials to be used on a scheme? Was this in place at the time of the work being carried out?

If a part or material to be was changed on a scheme, the person responsible for completion of the MIC form would obtain details of the new product/material(s), add new lines (and potentially strikethrough lines no longer needed), and sign the relevant line to confirm the details had been added to the form correctly. They would then make me aware of the changes via a phone call or email. I would review the changes, check the relevant approvals (DWI, WRAS, KIWA, BS6920 etc) and sign off the new products/materials if all matched and were in date. This procedure was in place at the time of the construction of Diddington service reservoir site. I was not responsible for, nor had sight of how that change process worked outside my area of responsibility (within supply chain, procurement, design, construction onsite etc), and cannot comment on processes or procedures in place to manage changes of products/materials in these areas.

7) Do you know if anyone else at Anglian Water was notified about the use of non-approved products or changes to the inventory of materials (if so please provide further information)

I am not aware that anyone was notified about my use of non-approved products or changes to the inventory of materials on the Diddington scheme, apart from routine updates as detailed in my answer to questions 5 and 6.

8) Who was in charge of managing the overflow installation and fabrications and what company did they work for?

I am unsure of the structure of the principal contractor, J.N.Bentley at the time, and am not able to name an individual in overall charge of managing the overflow installation and fabrications within Diddington service reservoir.

9) Would you receive any paperwork or guarantees from the company modifying the pipework including details of application conditions and cure times?

Signature: [REDACTED]

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Continuation Statement of: Statement of: Dr [REDACTED]

If a product (e.g. pipe) or materials (e.g. a coating) were to be used in contact with potable water, the Anglian Water Materials in Contact procedure in place at the time defined it to be the responsibility of the individual compiling the MIC form to ensure the Instructions for Use (IFU) document/details were obtained where specified on the approval, and that this product was used in a manner compliant with both its approval and its IFU document. The responsibility of the scientist signing off the product/material was limited to confirming the product listed aligned with its relevant approval details (e.g. DWI approval number, WRAS listing etc). I would not have become involved in discussions relating to modifying internal pipework, unless invited to give my opinion. I do not recall being specifically invited to give my opinion on the products/materials in question.

10) When did you first become aware of the issue regarding the installation of non-approved products in contact with water at Diddington? How did you become aware?

I became aware of the use of potentially non-compliant products at Diddington SR on 2 November 2021 when I was invited to enter Diddington West tank following its draining due to ongoing work. I entered the tank with colleagues from the Water Quality Risk and Optimisation team. Having recently been made aware of potential issues at another site (which have been reported to DWI), we were more aware than usual of the potential for approved products being installed in a way that negated their approval. Following inspection of the inlet pipework in the tank, it was noted there was the possibility for similar issues in this tank. These concerns were reported upwards immediately. As far as I am aware this is the first time that anyone within Anglian Water was aware of the potential use of non-compliant products within this structure.

11) Do you know why the situation of non-approved products being installed occurred?

The "Materials in Contact" procedure in place at the time centred on a two-part approach – Firstly approval of a list of the products/materials used by the responsible person on the project, and counter-signing by a member of the scientific team. Secondly water quality laboratory sampling, followed by sign-off by the scientific team of the new assets to enter supply. However, responsibility for ensuring the exact location within the scheme of each product and/or application of the materials listed on the MIC form was compliant with the approval and IFU document was a responsibility of the contractor. Onsite operative and managers may not necessarily have had a sufficiently high level understanding of the consequences of their actions with respect to Regulation 31 compliance, as those undertaking the mainly paper-based exercise of completing the MIC form. It is likely that this mis-understanding of the importance of placement/application of a product approved on the MIC form, led to these approved products being used in a location and/or method that negated their approval. There was not a procedure in place to audit the asset post-installation with a focus on Regulation 31 – and even if there were it is still possible that issues such as pipes approved for carriage of water being subject to total immersion, and repair patch materials being used not in accordance with their IFU document – would not be picked up on a site audit as these issues would not be visually obvious. I am not aware of any intentional use of non-approved products on the scheme.

12) Do you have anything you would like to add relevant to the event reported for Diddington?

I do feel there is an important distinction to make between use of a 'non-approved' product, and use of an approved product in a way that negates its approval (so becomes 'non-compliant' with its approval). Although I fully agree that both failure modes lead to a deviation from Regulation 31, the former potentially suggests more of a conscious intention to deviate. To the best of my knowledge no product used on this scheme fell into the former category,

Signature: [REDACTED]

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Continuation Statement of:

Statement of: Dr [REDACTED]

Hannington service reservoir

- 1) *Please provide an overview of the scheme at Hannington and your role in the approval of the material used on the scheme in relation to Regulation 31*

As I understand/recall it, there were two parallel schemes running on the Hannington site over the period in question. There was a scheme (being run by Operations and the Ops Capital team) to complete remedial repairs on the tanks, and there was the Grafham resilience scheme (to install pipework across the site, plus core drill Hannington SR 1A and 1B to allow new reservoir outlets to be installed). My involvement was in the Grafham resilience part of the work. Although the core drilling and installation of inlets into tanks 1A and 1B was part of the Grafham resilience scheme, the sampling and returning to supply of the asset (including the new outlets) following the work was the responsibility of Operations and/or Ops Capital teams.

- 2) *Can you identify who was responsible for the inventory of materials used on the scheme?*

I am able to identify only the individual primarily involved in completing the MIC inventory for the Grafham resilience aspect of the work within Hannington SR 1A. I understand this to have been [REDACTED]

- 3) *Who else was involved in the materials approval process and what was their role?*

A number of the items on the MIC form for Hannington tanks 1A and 1B were signed off by [REDACTED] on behalf of the scientific team. Please see my answers to question 14 for further explanation. Products and materials for Hannington tanks 1A and 1B were added to the MIC form by [REDACTED] (Anglian Water Supply Support Manager, for AW operations team) and [REDACTED] (for the Grafham Resilience scheme). Other lines on the MIC form (not related to the tanks) were signed off by [REDACTED] and [REDACTED]. One line was signed off by [REDACTED]. I cannot recall this individual.

- 4) *Please identify the MIC form number and relevant lines on the form for the products used which were not approved for being in contact with water (or were coated with a non-approved product)*

The MIC form used for both the Operations and Grafham resilience work is form number 2361. I do not believe that any of the lines listed on this form were not approved for being in contact with water intended for potable supply, and all were signed off with relevant DWI or WRAS/KIWA/BS6920 approval details. However, I now understand that listed on the form there were lengths of pipework that were approved for carriage of water but were installed in a position of total immersion (which negates approval). I have not been closely involved in the investigations into these potential issues, so although I can make assumptions (e.g. only lines 3 and 4 on Part A of form 2361 are related to pipework not approved for total immersion) I cannot say with absolute certainty which are the relevant lines.

- 5) *Were you notified of any changes to the list of materials to be used on the scheme? (If so please provide further information).*

I was not, to the best of my knowledge, notified of any changes to the list of materials to be used for either project at Hannington service reservoir.

Signature: [REDACTED]

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Continuation Statement of: Statement of: Dr [REDACTED]

- 6) *Is there a process or procedure to follow when contractors are changing materials to be used on a scheme? Was this in place at the time of the work being carried out?*

Please see my answer to this question on the Diddington service reservoir section.

- 7) *Do you know if anyone else at Anglian Water was notified about the use of non-approved products or changes to the inventory of materials (if so please provide further information).*

I was made aware by email dated 20th April 2016 copied to me (which I picked up on my return to work on 4th May 2016, see below), that it had been discovered a grout material used in Hannington service reservoir 1A between the new inlet core drill aperture and the puddle flange pipe, did not have WRAS or similar approval. This product would have been in contact with water intended for potable supply between 16th - 20th April. I queried by email to [REDACTED] (my Line Manager at the time) whether this issue had been upwardly reported, but received no reply. This issue was resolved by covering this material with an approved product, prior to Hannington service reservoir 1A re-entering supply later in 2016. I am not aware of any other notification about any use of non-approved products or changes to the inventory of materials, for either project at Hannington service reservoir.

- 8) *Who was in charge of managing the outlet pipework installation and fabrications and what company did they work for?*

The outlet pipework installation was managed by J.N.Bentley. I am not aware of the identity of the individual(s) within this organisation in overall charge of managing installation and fabrications.

- 9) *Would you receive any paperwork or guarantees from the company modifying the pipework including details of application conditions and cure times?*

Please see my answer to this question on the Diddington service reservoir section.

- 10) *When did you first become aware of the issue regarding the installation of non-approved products in contact with water at Hannington? How did you become aware?*

I became aware of the issue regarding the potential installation of non-compliant products on a conference call in early 2022 (I do not recall the date), following investigations across Anglian Water assets. This was after I became aware of the issue at Diddington service reservoir. I was not personally involved in determining the issues within the Hannington service reservoirs.

- 11) *Do you know why the situation of non-approved products being installed occurred?*

Please see my answer to this question on the Diddington service reservoir section.

- 12) *Are you aware of the situation at Hannington whereby reservoir 1A overflowed when being filled due to an inlet valve failing to close? What was your involvement in the decision making if so?*

Signature: [REDACTED]

Continuation Statement of: Statement of: Dr [REDACTED]

I understand the issue when filling Hannington service reservoir 1A occurred over a weekend, and my understanding is that the reservoir was reactively put into service on Saturday 16th April 2016. The operation to fill the reservoir was carried out by Water Operations, not the Grafham resilience scheme, and as such I was not contacted and had no involvement in this operation. I was also not on call that weekend, so would not have been aware of any issues until Monday 18th April.

13) Who was responsible for signing off the MIC form? Were you aware that this step was not completed prior to the tank returning to service?

Scientific materials sign-off for the Grafham resilience scheme (including the new outlet pipework) would have been my responsibility, counter-signing the products/materials added to the MIC form by the contractor (J.N.Bentley). The MIC form for this part of the scheme had not been raised at the point reservoir 1A entered supply. I had not been aware prior to Monday 18th April 2016, of the intention to put the tank back into supply by Operations teams, so had not queried why the form did not exist at that point. I became aware of the urgent need for the MIC form on Monday 18th April 2016. Scientific MIC sign-off for Operational/Ops Capital work (e.g. reservoir cleans and any remedial work within the Hannington tanks) would have been the responsibility of the Risk Scientist for the local Wing Supply area, from the date of reorganisation of the Water Quality teams at the start of April 2016. Prior to this the Water Quality Performance team would have still had this responsibility. My recollections on dates and the exact allocation of Supply areas around this time are sketchy (see question 14 below), but I would suggest the Risk Scientist for the Wing Supply area would most likely have been [REDACTED], until he left Anglian Water (I understand this to have been on Friday 22nd April 2016). I assume I would probably have gained responsibility for the Wing Supply area (from a Risk Science perspective) after [REDACTED]'s departure from Anglian Water, on my return to work in May 2016 (see below), I do not know who had this responsibility for the intervening few weeks. As above I was not involved in the Operations/Ops Capital-led work before May 2016.

14) Do you have anything you would like to add relevant to the event reported for Hannington?

Please note my involvement in the overall Hannington schemes was largely limited to materials and sample sign-off for the Grafham resilience project. I was not at work between Wednesday 20th April and 4th May 2016, for reasons unrelated to the Hannington scheme. I understand Hannington WR1A was taken back out of service on Wednesday 20th April, but I was not involved in the decision-making process for this as I was not at work. I was not involved in completing any MIC form relating to the site until 24th May 2016, when I was asked to provide scientific materials sign-off for reservoir 1A (on form 2361) prior to its planned re-return to service. By this time the MIC form for the asset encompassed both Grafham resilience (including cross-site pipework) and Operations/Ops capital aspects.

The Water Quality team underwent a restructure, initiated by [REDACTED], which I believe came into effect on or around 1st April 2016. At this point responsibility for completion of the MIC forms and Regulation 31 compliance moved from the Water Quality Performance team, to the newly-formed Risk Science team. Due to this reorganisation and the period where I was not at work, the first MIC form I was asked to complete was form 2361 (for the Hannington site). Due to my inexperience in this task, I reviewed this form in conjunction with [REDACTED] (a member of the former Water Quality Performance), who signed off many of the items on the form.

The whole time of the work at Hannington, encompassing 2016-2017, was a period of considerable flux within the AW Water Quality team due to the rapid reorganisation of the team and movement of Regulation 31 compliance responsibilities. [REDACTED]

Signature: [REDACTED]

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Continuation Statement of: Statement of: Dr [REDACTED]

[REDACTED] My involvement in the schemes at Hannington was therefore very fragmented and my recollections are now quite sketchy, relying significantly on email records rather than direct recollections.

Pitsford Water Treatment Works

- 1) *Please provide an overview of the scheme at Pitsford and your role in the approval of any material used on the scheme in relation to Regulation 31*

The scheme at Pitsford Water Treatment Works in 2017 included installation of a new water main from Hannington service reservoir site, and tying in of this main to the Pitsford site, including core drilling into storage tank B. My recollection is having little direct involvement in or responsibility for the mainlaying scheme or the core drilling of storage tank B and installation of the new inlet bellmouth, as I do not believe my local area of Risk Science responsibility included the Pitsford supply area at the time. My only involvement in this scheme came later, when my geographical area of Risk Science responsibility had changed, and I was the scientist responsible in 2019-20 for signing off a separate MIC form (form 3435) to complete the overall scheme (which had previously stalled). This included extension of the external pipework to the back of the storage tanks to reach storage tank A, core drilling of storage tank A and installation of a new inlet bellmouth within storage tank A. The inlet pipework for storage tank A was installed in Stainless Steel.

- 2) *When and how did you become aware of non-approved products being installed within storage tank B?*

I became aware of the potential use of non-compliant products in storage tank B at Pitsford WTW on 17th December 2021 when I was asked to enter the tank as part of a targeted program to identify any remaining assets that potentially contained non-compliant products (or approved products used in a non-compliant manner), following identification of potential issues at other sites. I entered the tank with colleagues from the water quality risk and local operations teams. Following inspection of the inlet pipework in the tank, it was noted there was the possibility for similar issues in this tank, related to the use of a coating on some pipework within the tank. These concerns were reported upwards immediately. As far as I am aware this is the first time that anyone within Anglian Water was aware of the potential use of non-compliant products or materials within this structure.

- 3) *We may need to make request further information about Pitsford. Please indicate if you would be willing to provide a voluntary statement if required.*

I would be willing to provide a voluntary statement if requested, though as noted above I do not recall being primarily involved in the scheme in question in 2017 and only became directly involved in the scheme after it was restarted (to complete the work in storage tank A and fully close the project) with different personnel in 2019-20.

Signature: [REDACTED]

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Official - Sensitive – When Complete

(Criminal Procedure Rules, r16; Criminal Justice Act 1967, s9)

Statement of: [REDACTED]

Age of witness (if over 18 enter "over 18"): Over 18

Occupation of witness: Project Manager

This statement, consisting of 2 pages each signed by me, is true to the best of my knowledge and belief and I make it knowing that, if it is tendered in evidence, I shall be liable to prosecution if I have wilfully stated in it anything which I know to be false or do not believe to be true.

Signature: [REDACTED]

Dated: 17-05-2022

My name is [REDACTED] and my job role at the time of the event I was Client Project Manager. Client Project Managers are Anglian Water (ANH) employees who are the interface between the Alliance/ Special Projects and ANH Operations. I was doing the contractual side checking timelines and costs stayed on track. My role was to check the scheme remained on track with ANH requirements (cost and time). I am now a 'Planner', planning schemes and programmes.

At the time my workload was such that I was able to help [REDACTED] at Bentleys to complete the MIC form. It was also a way to ensure that the form was completed correctly. [REDACTED] on the form was a graduate and again he was helping complete the form. [REDACTED] left and [REDACTED] continued to complete the form. The contact was not an 'Alliance' contract, it was a 'Special Projects' contract.

I have completed training on various water quality aspects including MIC training, the importance of materials coming into contact with water and filling in the form. The training was classroom based delivered by an ANH scientist.

The scheme at Diddington was a resilience scheme, which would protect supplies to customers, should Grafham WTW ever fail. The design was such that ANH were reversing the flows to Grafham WTW and Diddington reservoir was a location for water storage in the event of Grafham WTW being lost. I was not responsible for the design. I was given a list of all the materials that were to be used on site. [REDACTED] and I got the list and rang up the suppliers and manufacturers and asked for the approval certification for the items that were going to be procured. I just took the information from the list, checked it was Reg 31 approved and then got the scientist to sign off the MIC form. I was in a coordinating role and took it upon myself to support [REDACTED] when they completed the form.

I don't know the pipework that was installed in the tanks or which particular pipework was at fault. I do not know where the product list came from. The Project Manager for the work was [REDACTED] of JN Bentleys for Hannington and Diddington (the overall whole scheme). The MIC form for Diddington is referenced 2428. For Hannington the MIC form reference is 2361. I think Row 17 (Line 1) on the Diddington MIC form is for the overflow pipework (reference 56/4/537) but I'm not sure. I think the original list was from the drawings that gave fitting schedules, which formed the list for Reg 31 checks and procurement. I do not know what checks were done with procurement, to check that they had ordered the correct pipe on the list. I don't know what was installed on site, I just know that what we were procuring was from the form and my role was to check the individual components were Reg 31 approved. I did not check the schematics for the site, only the list.

I do not know which specific designer was involved in completing the fittings list, as there were numerous people involved.

I do not know about the Dacrylate V&M enamel 97-line coating, and do not think it is on the form.

I understand that the pipework was blistering and flaking. I was notified of this in March 2022.

The Project Manager worked for JN Bentley and the design was Mott MacDonald so there was a cross over.

[REDACTED] was the scientist, we would speak to him via email or he would come to site to meet with us. [REDACTED] would check the form and add queries in the comments box and I would answer his queries. [REDACTED] would then sign off each row in the MIC form. The sampling was done by the scientists and results can be seen in Line

Signature: [REDACTED]

Page 1 of 2

Continuation Statement of:

Statement of: [REDACTED]

264 and below in the MIC form. [REDACTED] would sign off the sample results. I think Row 308 shows the sample results from the tank taken from the overflow pipework.

For Hannington I had the same role as it was one scheme. I worked with [REDACTED], [REDACTED] and [REDACTED] on this scheme. It was all the same people involved with maintaining the MIC forms. To my knowledge, based on the list, all the materials had Reg 31 approval. I was not involved with any changes on the scheme in 2016. The design was completed by Mott Macdonald and the installation was completed by JN Bentley and Stonburys cleaned the tank. The event was blistering and flaking on the Hannington tank pipework. The unapproved pipework code was 56/4/537 which looks like it is Line 3, Row 19 in the MIC form. Again this is the same pipe as in Diddington reservoir. I was not aware of any recognition that the wrong materials had been installed, I only found out about the issues at Hannington in March 2022. I assumed we were doing the right thing.

Signature: [REDACTED]

Official - Sensitive – When Complete

(Criminal Procedure Rules, r16; Criminal Justice Act 1967, s9)

Statement of:

Age of witness (if over 18 enter "over 18"):

Over 18

Occupation of witness:

Site Engineer

This statement, consisting of pages each signed by me, is true to the best of my knowledge and belief and I make it knowing that, if it is tendered in evidence, I shall be liable to prosecution if I have wilfully stated in it anything which I know to be false or do not believe to be true.

Signature:

Dated:

05/08/2022

My name is [REDACTED]. I work full time for JN Bentley based at Keighley Road, Skipton, North Yorkshire, BD23 2QY. I have present with my today [REDACTED]. I have not had contact with Anglian Water regarding the content of this statement. At the time of the event I was a quantity surveyor. I currently report to [REDACTED] and at the time of the event I reported to [REDACTED]. I do not have any direct reports. I worked with [REDACTED] and [REDACTED] from Anglian Water.

At the time of the Hannington and Diddington schemes I was going through the completion paperwork and pulling the loose ends together to collate the hand over paperwork. This included the MIC paperwork. I was down on site in 2017 for 8 to 9 months. On site I worked with [REDACTED] (JN Bentley's original quantity surveyor for the site), I joined [REDACTED] as an assistant quantity surveyor. The quantity surveyors role is to work together with the project team and the buying team who support the project to purchase the products and/or services. The buyers are separate to each project and have an overarching function across the company. [REDACTED] produced the original materials list from the drawing designs. I received this list and populated it onto Anglian Water's MIC form. I worked alongside [REDACTED] and [REDACTED] to do this. I took over from [REDACTED] but never met her, she was the site engineer before I joined. Everything I listed on the form I believed to be approved. Every time I put anything on the form I would have a discussion with [REDACTED] and [REDACTED] to make sure everyone would check the product approval and sign off the addition to the MIC form. I did not have any training from Anglian Water or on Regulation 31 before joining the project. Everything included on the forms I believed were compliant.

I did not inspect the pipework, I went into Diddington tanks to view the project but not to sign off any of the products. I just populated paperwork ready for completion and had discussions with [REDACTED] and [REDACTED]. I was not aware of anyone identifying that the pipework was not approved.

I was not involved with an into to supply activities. Construction had started when I joined the site team. I cannot remember what stage the construction was at when I joined. I was not aware of anyone reporting any issues with deliveries or coatings.

I was made aware of the issues relating to Hannington and Diddington in July 2022.

At the time I was working on the project everything seemed to make sense and have a thorough process around the materials and product purchased.

Signature:

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Continuation Statement of:

Statement of: [REDACTED]

Signature: [REDACTED]

Official - Sensitive – When Complete

(Criminal Procedure Rules, r16; Criminal Justice Act 1967, s9)

Statement of:

Age of witness (if over 18 enter "over 18"):

Over 18

Occupation of witness:

Contracts Manager

This statement, consisting of pages each signed by me, is true to the best of my knowledge and belief and I make it knowing that, if it is tendered in evidence, I shall be liable to prosecution if I have wilfully stated in it anything which I know to be false or do not believe to be true.

Signature:

Dated:

5/8/22.

My name is [REDACTED] I work full time for JN Bentley based at Keighley Road, Skipton, North Yorkshire, BD23 2QR. I have my colleague [REDACTED] with me here today. I have not been contacted by Anglian Water to discuss my statement, only to contact the DWI to arrange an appointment.

I currently report to [REDACTED] and at the time of the event I worked for [REDACTED] who was the operations manager. As contracts manager I ran the projects. My client project manager (counterpart in Anglian Water) was [REDACTED]. The work was completed under Anglian Waters 'special projects' framework. My direct reports were [REDACTED] (Diddington Site Manager), [REDACTED] (Hannington Site Manager), [REDACTED] (site engineer), [REDACTED] (site engineer). The project designers were Mott MacDonald (Mott MacDonald later bought JN Bentley). The designers were [REDACTED] and [REDACTED], they produced the designs, drawings and specified the materials used. I was not involved with any of the procurement around the products, I believe this may have been [REDACTED] who is one of our buyers. The site manager or site engineer would place a requisition from the drawing on the system, this requisition then goes to the buyers. The buyers use an approved supplier list and work within the Anglian Water frameworks.

[REDACTED] or [REDACTED] gave the POSWASH training at Anglian Water's Grafham Works. I have the National Water Hygiene Training. Anglian Water's training and standards are high when I compare them to other companies. [REDACTED] formed part of the project team. I remember Anglian Water being very focused on the MIC form, [REDACTED] worked on the MIC form with [REDACTED] and [REDACTED].

The project began in 2015. The Diddington reservoir construction began in December 2015 and reservoir construction was completed in mid-2016. The site went into supply on the 20 June 2017. JN Bentley built the reservoir, in situ concrete and pre-cast concrete was used. We also did 4 or 5 km of pipework to connect the new reservoir to existing assets around the Grafham WTW. The bellmouth piece at Diddington is a specifically designed bespoke piece of pipework coated in Scotch Coat, I believe this is approved for submersion. The connecting piece of pipe was ductile pipe and I believe this is the pipe that was not approved for submersion. However, at the time the work was completed all pipes were believed to be approved. The Diddington project included a team walk through with [REDACTED] and [REDACTED] with the forms to sign the items off. Everything was signed off which is why I was surprised that this was not approved. At the time it felt like a very thorough job. The MIC form for this project was very large. Anglian Water take Regulation 31 very seriously. I feel they do try their best and are committed to training contractors and the supply chain.

The Hannington project was an existing site with a reservoir with 2 cells (1A and 1B). We needed to connect into the 2 cells as part of the project. We laid approximately 2 km of pipeline at Hannington and connected into the cells. The outlets were new pipework (x4) and the inlets were existing (I do not believe we worked on

Signature:

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Continuation Statement of: Statement of: [REDACTED]

the inlets under this project). We cored through the wall, slotted the pipe through and grouted it up. I believe Anglian Water then cleaned the reservoir. I believe the final inspection and cleaning of cell 1B was completed between 30 January and 03 February 2017. The cell was put into service between the 06 and 10 February 2017. To my recollection JN Bentley were not involved with any internal tank operations after this date. The site cell 1B was approximately back in control of Anglian Water by the 10 February 2017, JN Bentley had no involvement inside this cell after this date. Cell 1A was inspected and cleaned between the 12 February 2016 and 23 February 2016. After this clean, JN Bentley would typically hand the site back over to Anglian Water under a sign off process. I believe that [REDACTED] was the supply support manager that JN Bentley handed over to.

My recollection was that at Hannington a material was used to grout around the pipe, the designers had specified this and it was bought and installed. However, between the time of design and installation the product approval had lapsed. To be completely secure and safe a different approved product was used to coat the material. I cannot be certain on the name of the materials.

To my knowledge JN Bentley ordered the pipe for Hannington and it was delivered to site. I had no knowledge if the pipe was amended by the supplier. To my recollection, we ordered a Regulation 31 approved pipe and this was delivered to site. I was not aware of the suppliers doing anything to the pipe that would have made it non-approved. The suppliers are approved by Anglian Water and go through an additional approval process with JN Bentley which may be a site visit or a desktop audit. We installed the pipe that was delivered.

I am not involved with return to supply activities. The 'into supply impact plan' would be a useful document to review for both Hannington and Diddington in order to identify site specifics when returning to supply as I believe Anglian Water create this to risk assess each site before returning to supply.

I have been part of the supplier assurance team on my current project for Anglian Water. I visit suppliers with Anglian Water to check suppliers that are used and that what they produce is in line with the requirements.

I believe that I am involved with this witness statement because Anglian Water had an issue at another reservoir where they drained the reservoir down for inspection and found an issue with the pipework. I believe Anglian Water then inspected the other sites that were completed around the same time which included Diddington and Hannington. I now understand that paint was flaking off the pipes. I became aware of this late in 2021. At the time we finished the work all the MIC forms were completed and signed off. I was surprised when this first got mentioned as it had been in supply for 5 years. I now understand that the external coating of the pipe was not approved but at the time I was not aware of this. The suppliers should have been made aware that the pipes were going to be submerged but I do not know if this happened. I do not know if anything was specified on the order forms. I am aware that as part of the investigations Anglian Water have been in touch with JN Bentley.

We have changed software systems (CMS was the old system) since the event and so it is difficult to check all the records but [REDACTED] or [REDACTED] may be able to access the older documents. The goods received documents should include the details of what was delivered.

Signature: [REDACTED]

Official - Sensitive – When Complete

(Criminal Procedure Rules, r16; Criminal Justice Act 1967, s9)

Statement of: [REDACTED]

Age of witness (if over 18 enter "over 18"):

Over 18

Occupation of witness:

Optimisation and Development Scientist

This statement, consisting of [REDACTED] pages each signed by me, is true to the best of my knowledge and belief and I make it knowing that, if it is tendered in evidence, I shall be liable to prosecution if I have wilfully stated in it anything which I know to be false or do not believe to be true.

Signature: [REDACTED]

Dated:

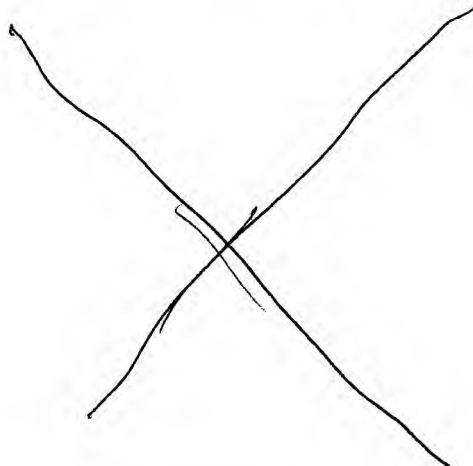
05/ 12/2022

My name is [REDACTED] I am an Optimisation and Development Scientist. I have worked at Anglian Water for 18 years. I am based at Alton treatment works in Ipswich. Before my current role I was a reactive scientist and prior to that I was an operational scientist covering the Colchester area. In April 2016 I think I was a reactive scientist, this work included being on a standby rota. I typically covered the Colchester and the Ipswich area.

I have completed the EU skills training and so hold a national water hygiene card. I have also completed the POSWSH training which was a classroom based learning at the time I completed it. I have completed Materials in contact (MIC) training which included awareness for Regulation 31, this was approximately 5/ 6 years ago.

Hannington is in the west area and I do not believe that I have had any involvement with Hannington. I do not remember any involvement with Hannington. If it was one standby many years ago it is possible that I may have been involved but I do not remember.

The Optimisation and Development Scientist role has no direct responsibilities for MIC forms or Regulation 31 however I would have had some involvement on the taste and odour issues at Kedington works, organising samples with Fera Science and supporting the investigation into the taste and odours occurring on site. During the investigations we did not know that unapproved pipework was in the contact tank. However the data showed taste and odours before the contact tank and so the data did not evidence that the detections were linked to the pipework within the contact tank. The taste and odour investigations led us to believe that the root cause was polysulphide in the raw water that when it came in contact with chlorine it caused the taste and odours. Sodium Bisulphite (SBS) dosing was installed as a remedial solution. I have supported the sampling associated with this investigation and installation but the @one alliance are leading the investigation.



Signature: [REDACTED]

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Continuation Statement of:

Statement of: [REDACTED]

~~[REDACTED]~~

Signature: [REDACTED]

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Official - Sensitive – When Complete

(Criminal Procedure Rules, r16; Criminal Justice Act 1967, s9)

Statement of:

Age of witness (if over 18 enter "over 18"):

Over 18

Occupation of witness:

Head of Supply

This statement, consisting of 3 pages each signed by me, is true to the best of my knowledge and belief and I make it knowing that, if it is tendered in evidence, I shall be liable to prosecution if I have wilfully stated in it anything which I know to be false or do not believe to be true.

Signature:

Dated:

05/ 12/2022

My name is [REDACTED], I am based at Hall WTW, Collingham road, Lincoln. I have been working for Anglian Water since 2010, I did work for Anglian Water between September 1997 and March 2002. I returned to Anglian Water in October 2010 after working at the Drinking Water Inspectorate.

In my first period at Anglian Water I was a supply manager (Treatment Manager). I was aware of product approval at this time and it was part of the POSWSH training. I received awareness training for the different sections of POSWSH and training on materials in contact. When I was at the Drinking Water Inspectorate I was involved with audits and inspections so I received internal training which gave me awareness of water quality risks and Regulation 31 approvals. When I was in the Deputy Chief Inspector role at the Inspectorate I led the re-write of the regulatory guidance document and so worked closely with the Regulation 31 team then.

Since coming back to Anglian Water I have completed the e-learning module on Regulation 31, this goes through the process and the procedures. Most recently I have chaired the POSWSH approval group which leads the changes and approvals for POSWSH policies and standards.

From the 01 August 2013 to 31 March 2018 I was the Regional Supply Manager, covering the west of the Anglian Region. I was involved with the return to supply of Pitsford, Diddington and Hannington. [REDACTED] became the Regional Supply Manager when I left the role to work on future planning as for AMP 7. When I took on the Head of Supply role I became responsible for the East and the West and so Kedington works would then have been under my responsibility.

Kedington was a new works and so it required Director approval to enter into supply. [REDACTED] was the Director at this time.

The process of putting an asset into supply is part of the impact planning process, this forms part of the operational acceptance. The hand over from an alliance partner is part of the DM4 process and once this is signed off then the warranty period begins. Preliminary work completed as part of operational acceptance covers the materials in contact (MIC) form, performance testing etc.

I was aware of the Hannington A tank tank going into supply. The supply manager would have been part of the approval process along with the network manager and tactical operations in addition to the water quality team. As far as I am aware they would have gone through this process. I was not involved with the sign off on individual tanks. The issues with Hannington and the valve passing occurred on a Saturday evening and the senior duty manager at the time tried to contact me on the Saturday night. They were not able to contact me and so I found out that the site had gone into supply via email on the Sunday or the Monday morning. Now we have a senior operations manager who is on shift 24 hours a day, seven days a week. At the time

Signature:

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Continuation Statement of:

Statement of: [REDACTED]

the senior duty manager would have been involved with the decisions surrounding putting Hannington A tank into supply. From what I can recall, the water quality team were involved with conference call decisions on the Saturday night regarding putting the tank into supply. It would be the water quality team who decides whether the event is reported to the Drinking Water Inspectorate. When I became involved the tank was already in supply and so I cannot comment on actions or decisions taken during the incident calls. The normal process would have involved commissioning sampling on the tank prior to returning to supply but due to the incident I believe that the sampling was taken retrospectively due to the emergency nature of the return to supply.

Regarding Pitsford storage tank B it went into supply on the 06/07 October 2016, the local supply manager would have approved the return to supply at the time. There was an algal bloom at Pitsford and I remember there being a number of incident calls and I went to site to understand options for optimising the process and bringing water in from elsewhere. I cannot remember how long the algal bloom was an issue for. We reduced the flows through the works to optimise the process and I remember we carried out some sampling on the tank before we put it back in. I recall that there was an operational incident team running but I cannot remember what was documented and whether there was an impact plan to return the tank to service. I think [REDACTED] was the water quality manager for the West and so may have been involved with the incident at some point, however I do not know if [REDACTED] was involved with any actual decision making. As far as I can remember we would have followed the usual process for returning a tank into supply by standing it for 16 hours and then taking samples. The full MIC suit would have been undertaken for sampling due to the work completed in the tank. As far as I remember we followed that process for Pitsford. I was not aware of treated water quality issues on the final water from Pitsford at the time of the algal bloom event. The event was causing a lot of sludge build up on the clarifiers, there was turbidity carry over onto the GACs and this was impacting the sufficiency of water available through Pitsford, but not impacting on final water quality. The tank was important for resilience to bring the Hannington water in through the tank at Pitsford, hence putting the tank into supply. We wanted to minimise the demand on Pitsford, there are network options to put more demand on Morcott and Wing treatment works. In parallel to using the network resilience options we were trying to optimise Pitsford, for example the coagulant dose was being increased.

Regulation 31 sign off sits within the water quality team. The @one alliance partners or in-house resource would complete the MIC form and then the MIC form is signed off by the water quality risk scientist. The water quality team are relied upon for this and the supply manager would not be expected to check this form. The tank is always sampled, despite the MIC form, I remember we were waiting for results. In my mind once the commissioning samples returned we would have been good to go into supply as long as the results were satisfactory. It may have been that for Pitsford the tank was not stood for the full 16 hours due to the emergency situation but I do not recall this. It would have been a risk based approach to decision making and this would have been discussed during conference calls.

On Diddington I am not aware of the missing inspection report. Reservoir engineers would report back findings to the supply manager of the site, the inspection reports would be shared and issues highlighted to the site supply manager.

As part of remedial solutions within the tanks Anglian Water have taken the decision to protect aspects of water quality that may be impacted by Regulation 31. This has included removing pipework and encapsulating pipework.

I was involved with the original event reported to the Drinking Water Inspectorate and held discussions with [REDACTED] regarding the event. Since the events were discovered there has been a number of retraining and process review actions. [REDACTED] is actively engaging with the wider water industry to share learning. Supply teams for Anglian Water and @One alliance teams have been re-briefed to ensure that they are all compliant with the process. There is a Regulation 31 improvement programme that the water quality team are leading, this includes procurement. Procurement already have audits and checks in place but this is now being reviewed at every step to ensure that there are no gaps in the process that could present a risk.

Signature: [REDACTED]

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Continuation Statement of:

Statement of:

[REDACTED]

Signature:

[REDACTED]

[REDACTED]

[REDACTED]

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(Criminal Procedure Rules, r16; Criminal Justice Act 1967, s9)

Statement of: [REDACTED]

Age of witness (if over 18 enter "over 18"):

Over 18

Occupation of witness:

Head of Technical and Quality

This statement, consisting of [REDACTED] pages each signed by me, is true to the best of my knowledge and belief and I make it knowing that, if it is tendered in evidence, I shall be liable to prosecution if I have wilfully stated in it anything which I know to be false or do not believe to be true.

Signature: [REDACTED]

Dated:

20/09/2022

My name is [REDACTED] I am the Head of Technical and Quality at Electrosteel based at Ambrose Yard, Broombank Trading Estate, Broombank Road, Chesterfield, S41 9QJ.

Anglian Water have not been touch regarding this statement. Anglian Water have not audited this site before. In November 2021 I received contact from JN Bentley and was asked to attend some MS Teams calls with Anglian Water scientists. I saw some photos and it was clear that ductile iron pipe had been put into the tank. The only site I was involved with was Grafham treatment works, I believe it was the Hannington site. The project was called Grafham resilience.

I was asked about a solution to remediate the situation. Anglian Water scientists wanted information on the coating (Dacrylate). I believe the company were trying to get in touch with Dacrylate to do some testing on the coating.

From my perspective I could see what had happened and they were asking questions about how to resolve the issues. They were looking at how they could cut the pipe back or coat it in acothane. Anglian wanted to cut the pipe back to the wall and then coat it in acothane and then use coated mild carbon steel.

The original order was put into Electrosteel in 2015, it was a standard order for ductile iron pipe. I was not involved with this order as it was standard, it went through the usual process, production and dispatch channels.

Steel is a more expensive product, the price has increased a lot in recent months. On steel jobs JN Bentley tend to use standard steel suppliers, going direct to the manufacturer. My gut feeling, personal opinion on the event was that human error occurred and someone did not realise that the pipes going into the tank were not Regulation 31 approved for submersion.

Typically a wall coupling would be used, sitting in the wall itself and coated in Regulation 31 approved materials. The wall coupling is then used between the transfer pipe and the submersed pipe. In this instance, that was not done and the ductile iron pipe was put straight through the wall and into the tank itself.

Lead times for ductile iron and steel are similar, there would not have been much time saving gained from using the ductile iron pipe.

In 2015 Electrosteel had two suppliers of coatings, we used Dacrylate for external coatings and for anything on flange faces or internal, we used 3M 162 PWX (white or blue in colour). Presently we have two coating suppliers, Acothane (used for in contact with water) and Axalta (not for contact with water).

Signature: [REDACTED]

Continuation Statement of: Statement of: Barry Price

When the pipes are delivered from India they would have been PC Chandra blue coating which was WRAS approved however, since then our EN 545 pipes are externally coated with Electrocoat EP812 Blue (WRAS approval number 1807507). If we were fabricating or making bespoke pipework we would add the Dacrylate to finish the pipe.

Signature:



Official - Sensitive – When Complete

(Criminal Procedure Rules, r16; Criminal Justice Act 1967, s9)

Statement of: [REDACTED]

Age of witness (if over 18 enter "over 18"):

Over 18

Occupation of witness:

Reservoir and Tower Team Manager

This statement, consisting of [REDACTED] pages each signed by me, is true to the best of my knowledge and belief and I make it knowing that, if it is tendered in evidence, I shall be liable to prosecution if I have wilfully stated in it anything which I know to be false or do not believe to be true.

Signature: [REDACTED]

Dated: 05/12/2022

My name is [REDACTED], my company office base is Stoke Ferry water treatment works. I have been at Anglian Water for 16 years, joining as an electrician. I did water and wastewater installations as a tier one contractor. I worked at Grafham as an electrical engineer also. In approximately 2010 I became a operational capital delivery engineer, within this role I was a project manager and then later I was trained up to be a reservoir and tower inspection engineer (approximately 2012/2013). Now I am the reservoir and tower engineer manager and have been for two years since January 2020. I manage a team of four people. At the time of the Pitsford, Hannington and Diddington events I was in the reservoir and tower team, managed under the operational capital delivery team. I reported to the regional manager, [REDACTED] I temporarily left the reservoir and tower team in approximately 2015 and then returned in early 2016, my first inspection was Pitsford.

When I was in the operational capital delivery team, training included 20 inspections with a qualified engineer, then 10 inspections on your own witnessed by an engineer. I shadowed [REDACTED] I was also supported by [REDACTED] who was the 'expert' at the time. [REDACTED] put me forward for being a competent inspector and [REDACTED] and [REDACTED] approved the sign off and competency.

I did not do any academic training in 2012/ 2013 for reservoir inspections, only shadowing, however now there are a suit of courses including inspection theory and practical sessions on inspection. This training package was started in approximately 2020. I had standard water quality training as part of the delivery of projects, this included sampling. It was an in-house training course with a water quality scientist. As part of the training we covered using the materials in contact (MIC) form because part of the job required filling in the MIC form part A.

As part of the inspection process we take out the previous inspection form, including the repair works and location within the tank, the flood tests would also be in the inspection form. This was compared to the present inspection being undertaken. The Inspection form does not include the materials in contact form or consideration for materials used. If the pipework looked new, blue and in good condition it was considered ok. We would check the MIC form was completed during the inspection process but that was the responsibility of the contractor team and water quality risk scientist. I would check it has been signed off by the risk scientist and then sign off the tank.

On Hannington I went to site with [REDACTED] and I saw the tank being completed. According to the paperwork I inspected the tank with [REDACTED] however I have no recollection of this inspection. This would have been a final inspection, flood test and clean. I was not aware of the emergency return to supply for Hannington. The reservoir and towers inspection team would not be kept in the loop on return to supply operations. This would have been communication between the contractor and supply manager.

For the Pitsford storage tank 2 the first inspection was completed by [REDACTED] prior to the pipework being installed, I do not know the exact date of this inspection. [REDACTED]'s inspection failed on some of the hatches due to ingress risks. The penstock was also passing and the tank had friable concrete (reacting with the chlorine). [REDACTED] recommended that these issues were fixed. The penstock required repair work and the delivery route was changed to do this. The delivery team were building the chamber for the outlet and the

Signature: [REDACTED]

Continuation Statement of:

Statement of: [REDACTED]

new penstock. On the 06 October 2016 I was called to do an emergency inspection of pitsford storage tank 2 with [REDACTED] to return the tank back into service. We did our final checks on the upstands and hatches including flood tests and an internal inspection. I saw the new pipework but it was not recognised that this was not Regulation 31 approved for installation inside a tank. We did verbal checks on the delivery partners work. It was noted during this inspection that one hatch over the new outlet penstock chamber was not of the correct standard and creating a risk of animal ingress. This inspection was from 22:00 on the 06 October 2016 to 02:00 / 03:00 on the 07 October 2016. Once inspected the tank was cleaned and handed over to the supply team. After this the tank was taken out again for the replacement of the hatch, I cannot recall the date this was removed from supply.

I have been into the Pitsford storage tank 2 since 2016, on the 01 August 2017 to check the new hatch installation. I also went into the tank on the 25 March 2021, this was an initial inspection of storage tank 2 that identified no major work, just some hatch repairs. This 2021 inspection was part of a water quality coliform failure investigation. On the 11 May 2021 I did a final inspection on Pitsford storage tank 2 and signed it off for a clean.

When I went into the pitsford tanks I did not notice any issues with the pipework. This was only identified after the pipework issues was discovered in Kedington. The colour of blue was acothane and so this was a colour that was often seen. There are no pictures from the 2016 inspection of the new installed inlet pipe.

On Diddington, this went into supply in February 2018 but I have not seen the inspection report from the inspecting engineer. I have a question mark over this tank and its inspections. Previous to the 21 November 2019 I did not have any experience of inspecting Diddington. I cannot find any report on the Anglian Water G-Drives documenting a tank inspection at this site. I had involvement with the tank as it was being built but this was to do with the structure itself such as use of gravel on the top and a fibre optic leak detection system that was installed. I was not involved with any inspections on this tank until 2019. The 2019 inspection was a warranty inspection, I went in and identified some issues such as incorrect hatches. In 2019 I did not identify any issues with the pipework. I saw that the paint was a little bit flakey but I did not see this as a risk as I believed the pipe to be approved. Sometimes paint flakes can come from jet washing or flushing operations. I did not know the origin of the paint flakes. I did the final inspection on the west cell on the 22 May 2020 and the final inspection on the east cell on the 29 May 2020. All work was completed when I did these final inspections, the work was completed by Bentleys to a satisfactory standard so I signed off the tank for cleaning. I returned again as part of the Grafham resilience clean (flushing the main from Hannington to Diddington, reverse flow) on the 08 November 2021 and during this inspection I noticed that the paint on the pipework had deteriorated to a powder and there were more paint flakes as well as hatches leaking. Diddington remains out of supply whilst works are completed. Bentleys solution to the unapproved pipework was to encapsulate it in concrete, this has been assessed by the risk scientist, material expert and the reservoir and towers inspection team.

Once the reservoir and towers engineers produce the inspection reports they are stored on the Anglian Water system, they are owned by the Reservoirs and Towers team and are not checked by anyone else.

As part of learning from the events we now look at all materials within the tank and have implemented new training procedures, we want to be above standards. We now have better reports, photos, improved data capture. We have a structured filing system for each asset showing the timeline of inspections.

Signature: [REDACTED]

Official - Sensitive – When Complete

(Criminal Procedure Rules, r16; Criminal Justice Act 1967, s9)

Statement of: [REDACTED]

Age of witness (if over 18 enter "over 18"):

Over 18

Occupation of witness:

Chief Engineer

This statement, consisting of [REDACTED] pages each signed by me, is true to the best of my knowledge and belief and I make it knowing that, if it is tendered in evidence, I shall be liable to prosecution if I have wilfully stated in it anything which I know to be false or do not believe to be true.

Signature: [REDACTED]

Dated:

11/08/2022

My name is [REDACTED] I work full time for Anglian Water based at Thorpe Wood House, Thorpe Wood, Peterborough, PE3 6WT. I am the Chief Engineer and have been in this role for 14 months since approximately June 2021. Prior to being Chief Engineer I was head of solutions within the @ One alliance for 3 years and then prior to that I was Head of Engineering for @ One for approximately 10 years. I report to [REDACTED] who is responsible for the Strategic Delivery Assurance.

At the time of the four projects I worked for @ One that was responsible for Pitsford and Kedington during their concept and delivery. I became involved with Diddington and Hannington for the back check and wash up following the issues being identified on the pipework.

In my position I have done all the high level awareness training for water quality and water hygiene, I have done the materials in contact training and the POSWSH training. I have over 30 years within the water industry I have designed, built and commissioned treatment works including tanks, pipes, pumps and everything related in the delivery of treatment.

When I headed Engineering in the @ One I reported to [REDACTED] and I was a member of the leadership team for At One. I was not responsible for the project managers. I was responsible for the design teams. I ran over 800 schemes during the AMP period. My direct report was [REDACTED] who was the Design Manager for Infra at the time of the Pitsford project, a different design manager ([REDACTED]) was responsible for the Kedington project. We were an integrated delivery team, involved through the whole project life from beginning to final commissioning. My team would have specified which materials were used for the job, all drawings, design specifications and standards were from my team. My team were not responsible for procurement. My team would specify to procurement that products must meet approved standards.

I think Balfour Beatty were the principle contractor for the Pitsford project. [REDACTED] was the project manager in charge of the scheme. My designers sat within the delivery team and collaborate fully with the project team. There should be no hand offs, @ One is designed to be a fully integrated team.

The designers create the design which populates a procurement schedule. The procurement schedule is then used to procure the materials. At the time of the project, and in exceptional circumstances, tier 1 contractors could back office procure meaning that contractors within the @ One alliance could procure their own materials.

The pipework that was installed at Pitsford had to meet the designers standards. If there was any deviation from the design this would be escalated. Advisory notes would be included in the design which is standard drawing and design standards so that procurement can order the correct items. I believe the pipework went in functionally as designed. It has been implied retrospectively from the design information that the exact

Signature: [REDACTED]

Page 1 of 3

Continuation Statement of: Statement of: Mark Froggatt

functionality for the pipework was not explicitly specified on the drawings. The drawings showed the pipe within the tank however did not explicitly identify the difference between full continuous submersion versus the transfer of water internally within the pipe.

At Pitsford it was clear that somebody applied a second coating. It is not known if the instructions for use were followed.

The design team understand Regulation 31. Only trained individuals can request items for the materials in contact list. Whatever the trained individuals request, that is what should be procured. The materials in contact form goes through a transition in its lifetime, it gets called up, populated, checked and signed off.

As designers we will specify an optimum design. Procurement may suggest alternatives. A change control would be used if there is a difference in the materials. What should happen is that the designers are consulted. There would be a technical query to the designers who would approve or reject the change. There should be a paper trail if this process occurred. The designer has a responsibility for water quality, they will not knowingly specify a product that is not approved. The procurement team sit within the delivery team which the designers also sit within. People are brought together so that they can work collaboratively on the projects together.

The supply chain, under construction design management regulations, is checked to ensure that they are capable and able to deliver what we need them to do. My team will check and maintain a register of approved suppliers. They go through training at a framework level and on site with project teams. Stonbury's would have been checked and trained before starting on the project as they were a tier 2 supplier. Balfour Beatty were one of the tier one partners and they would have gone through technical, functional, financial and behavioural checks before being brought onto the framework, as with any of the partners. These checks are done at the start of the framework agreement and then an annual performance review is conducted. The alliance is based on 'best for task'.

The material in contact form is owned by the water quality team, it is requested by the designers, provided to the designers, populated, checked by water quality and then approved. The document would be listed on the programme area. The water quality team would be reliant upon the engineers for the content of the document to be correct. This process has changed now as the business is continually getting more and more digital.

The issues at Kedington were initially identified on the inlet pipework to the contact tank. I believe that FLI Carlow were responsible for the pipework within the Kedington tank. [REDACTED] was the project manager for Kedington. There were a number of designers on the project.

In answer to your question on whether I know of any issues on washwaters, I am not aware of any washwater or supernatant issues at Kedington.

In answer to your question, would I know the difference between different types of pipe coatings and materials used, my answer would be, visibly I would be able to see whether the coating is of a particular type such as fusion bonded epoxy coatings, standard epoxy coatings or other spray coatings. My eyes cannot see if it is approved or not. The Kedington pipe has a texture on the surface which suggests that the coating is an aluminium, zinc spray applied coating, overtopped with an epoxy finish.

The drawings were accompanied with a standard notes drawing to specify pipe details. This has been subsequently developed to be more specific. During the Kedington period of construction I was in the solutions arena. I visited site when it was being built but I did not go into the tank as I was not confined space trained. I was never made aware of any issues with the pipework within the tank, I had no reason to believe that the pipework was not compliant. I only understood that unapproved pipework was installed following the events being reported.

The unapproved pipes are bagged, labelled and currently in storage at Grafham. I believe that the work

Signature: [REDACTED]

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Continuation Statement of:

Statement of: [REDACTED]

inside the Kedington tank has been completed to a satisfactory nature. I believe that the replacement works has been completed. The tank has not yet gone into supply. Nothing goes into supply before [REDACTED] the reservoir engineer has given his final approval on the tank. The sign off is a multi-layered system so that issues get identified.

I am not aware of any conflict between @ One and our suppliers. You ask whether I am aware of any specific meetings in September and October 2021, I am not aware of any specific meetings but I would be expecting meetings to be occurring to identify the root cause of the issues identified.

[REDACTED] is a materials scientist in my team working closely with [REDACTED]. He is working almost full time on the issues to define, understand and quantify the unapproved materials used. [REDACTED] and the team have actively reviewed all previous projects to see if there are any other issues. We have reassured ourselves that as far as reasonably possible we have reviewed the records and satisfied ourselves that we are able to demonstrate compliance.

If a project is not delivered on time there could be financial and reputational consequences within the project management organisation. There are key milestones that are well defined and these are targets that need to be met. All projects are planned and the plans are reviewed and rehearsed so that equipment, resource and finance are checked for each project. There is a due process so that if dates are not met a highlight report is created giving forwarding of date changes. I do not think Kedington was particular time pressured. The designers actions are being scrutinised all the time. We train them correctly and give them the correct tools so that they can communicate effectively with the project team.

For the Diddington and Hannington schemes, as part of our investigations, we have left no stone unturned. Where we saw something that we could not absolutely define, changes have been made to ensure that the required standards are met. Where there was any potential confusion or lack of clarity, action has been taken with records maintained.

Our design standards and change control have been reviewed to ensure that the correct procedures are in place to remove confusion. We are working within the supply chain and are aspiring to create a digital fingerprint of our assets.

Signature: [REDACTED]

Page 3 of 3

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(Criminal Procedure Rules, r16; Criminal Justice Act 1967, s9)

Statement of: [REDACTED]

Age of witness (if over 18 enter "over 18"): Over 18

Occupation of witness: Pipeline Engineer

This statement, consisting of [REDACTED] pages each signed by me, is true to the best of my knowledge and belief and I make it knowing that, if it is tendered in evidence, I shall be liable to prosecution if I have wilfully stated in it anything which I know to be false or do not believe to be true.

Signature: [REDACTED]

Dated: 11/08/2022

My name is [REDACTED] I am a principal pipeline engineer for SWECO. I work as part of the At One alliance. I joined the At One alliance in approximately 2014.

When I joined SWECO I completed some materials in contact training in 2018. I cannot remember whether I did any training prior to working at Pitsford. I was working under a technical delivery manager at the time of the project ([REDACTED]), I reported directly to [REDACTED] [REDACTED] was the project manager, who was overseeing the whole project.

My main responsibility was pipeline design for the project. I worked on the hydraulics, constructability, health and safety. I produced the drawings used for the project. I included different colours on the pipework in the drawings to signify the different coatings for the different sections of pipe. They do not refer to the actual composition of the coatings that were applied.

I populated the materials in contact form with reference number 1984. I entered lines 23 to 26 (excel lines). I was mostly involved with materials in contact form 1984 which included the pipe fittings and the coatings that were used on the project. Reference 1984 was the original form. I did not populate materials in contact form reference 2790. I partially populated form 1796 to include the DWI reference numbers as this form came through from [REDACTED] who worked for Stonbury at the time. I only had correspondence from [REDACTED] from Stonbury. [REDACTED] asked me to check whether some materials were compliant for use in the Pitsford tank, I checked the form and then sent it to water quality. [REDACTED] was the water quality contact and I remember there being some back and forth with [REDACTED] regarding the contents of the form.

I was not aware of any products not being approved. I checked the DWI approval register to make sure that the products were approved.

I have heard that the pipe was non compliant due to an additional coating but during my time on the project I was not aware of the pipe being coated with any additional substance. My specification included factory applied coatings for the pipework, including scotchkote and resicoat. Jindall Saw provided standard fittings with resicoat and also provided straight sections of pipe and fabricate flanges with factory applied scotchkote.

I generally sit behind a desk and so I do not typically see the pipes that are ordered. I did not know that there were any issues with the pipework for Pitsford. I did not go inside the tank at the time of construction.

Signature: [REDACTED]

Continuation Statement of:

Statement of:

[Redacted]

Signature:

[Redacted]

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(Criminal Procedure Rules, r16; Criminal Justice Act 1967, s9)

Statement of: [REDACTED]

Age of witness (if over 18 enter "over 18"):

Over 18

Occupation of witness:

Reservoir and Tower Engineer

This statement, consisting of [REDACTED] pages each signed by me, is true to the best of my knowledge and belief and I make it knowing that, if it is tendered in evidence, I shall be liable to prosecution if I have wilfully stated in it anything which I know to be false or do not believe to be true.

Signature: [REDACTED]

Dated:

05/12/2022

My name is [REDACTED], I am a reservoir and tower engineer working at Anglian Water. My work base is Alton water treatment works in Ipswich. Previous to this job role I used to be part of Morrison water utilities and during this time I completed materials in contact form training. I therefore had familiarity with the form and product approval when joining the reservoir and towers engineering team. I have an EUSR card and I also did the Anglian Water POSWSH training. For a number of years I was a trainer for the POSWSH courses. When I started in the reservoir and tower engineering team I completed the competency training pack, this included external Anglian Water training on inspections and a minimum of 20 inspections shadowing an engineer. This was then followed by me leading 10 inspections with a qualified engineer shadowing me to check my work. At the end of the 30 inspections I then completed an assessment paper, which I passed. I was then put forward for sign off by my manager [REDACTED] and signed off by my senior manager who was [REDACTED].

Kedington water treatment works had an initial inspection on the 16 and 17 March 2020 the pipe was blue with no issues showing, it was a regular blue pipe with no flaking. I next inspected the tanks on the 27 May 2021 as part of the one year warranty check which coincided with the @ One Alliance installing some new items. I went into contact tank number one first with [REDACTED] from Divetech (tank clean contractor). It was during the inspection of contact tank one that I noticed the paintwork had bubbled. We went into contact tank number 2 and saw that the inlet pipe was also bubbling on the paintwork. In tank 3 it was the same but not quite as bad as in tanks 1 and 2. I escalated to [REDACTED] my manager and discussed options, we were concerned that cleaning the pipe off might make the bubbling worse. [REDACTED] asked me to contact [REDACTED] who visited site the next day (28 May 2021) to assess the pipe paintwork. Many of the photos of the bubbling paintwork were taken on the 28 May 2021. I had never seen bubbling like this before. Paint flakes were on the floor and walls. I was concerned that jetting the tank would spread the paint flakes around the tank. [REDACTED] was there to give advice and support on what to do next.

In the May 2021 the tanks at Kedington works were inspected and passed the floodtest, however the paintwork issues needed further investigation and remedial work completed. I recommended that the pipes were replaced and there were a few additional minor issues such as replacement of fly mesh.

I believe that the tanks remain out of supply but that the issues have been rectified. I went back into the tanks on the 17 and 18 October 2022 and confirmed that the remedial work was completed to a satisfactory standard. Some of the pipework has been replaced (inlet pipework in both contact tanks) and some has been encapsulated in concrete (outlet pipes for washwater filters). In the balance tanks the overflow pipes have been replaced and the outlet pipes have been encapsulated. The tanks were cleaned and disinfected after this inspection but I do not believe they have been put back into supply. The commissioning and sampling is being completed. I do not expect to go back into the tanks as it has been handed back over to the @one alliance.

Typically once the reservoir and tower inspectors have highlighted issues the team take a step back to let the contractors complete the required remedial work.

I was not aware of any other issues at Kedington works, or return of the works into supply. I did a flood test

Signature: [REDACTED]

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Continuation Statement of:

Statement of: [REDACTED]

and inspection of the dirty wash water tanks as there is a supernatant return to the head of the works from here but there is no blue pipework within this tank.

Signature: [REDACTED]

Page 2 of 2

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(Criminal Procedure Rules, r16; Criminal Justice Act 1967, s9)

Statement of: [REDACTED]

Age of witness (if over 18 enter "over 18"):

Over 18

Occupation of witness:

Water Quality Risk Manager (East)

This statement, consisting of pages each signed by me, is true to the best of my knowledge and belief and I make it knowing that, if it is tendered in evidence, I shall be liable to prosecution if I have wilfully stated in it anything which I know to be false or do not believe to be true.

Signature: [REDACTED]

Dated: 05/12/2022

My name is [REDACTED]. I am the water quality risk manager for the east area at Anglian Water, my office base is Heigham water treatment works, water works road, Norwich. I joined Anglian Water in 1999 doing contract work at the start. I started within water services and was in the innovation team for a short period before moving back to water services. I manage the water quality risk team (a team of five risk scientists) looking at medium to long term risks to potable water, at the treatment works and within the network. My focus is on proactive work. I have completed materials in contact training which is a classroom session (approximately 10 years ago), I have also completed a computer based training on materials in contact more recently, approximately 18 months ago. I have completed the EU skills training and so hold a national water hygiene card.

I was aware of the Kedington project when I was in the quality team but my first real involvement was in March 2020 which was preparing site ready for getting it into supply. I was involved with the Materials in contact (MIC) form sign off. [REDACTED] (my direct report) became involved with the Kedington project to sign off the MIC form. The risk scientists would not usually do on site inspections. At the time of the Kedington project my line manager was [REDACTED] (water quality risk and optimisation manager).

I had not been involved with any site visits to Kedington at that point in time. [REDACTED] the risk scientist was responsible for signing off the MIC form and on the Kedington scheme she checked a few of the MIC form results with myself. We then moved to a position of signing off the form using performance sampling. This involves 7 days of running to waste. For Kedington we had 10 days of run to waste so that there were 7 samples for every parameter required for the sign off.

I was not aware of any pipework material issues at the time of this work.

I visited Kedington on the 6 July 2021 to inspect the unapproved pipe that had been removed from the tank. This was an external inspection, I did not go into the tank at that point in time.

I went into the Kedington tank on the 15 August 2022 to check the new pipework that was installed to replace the unapproved pipework. We are currently in the process of taking MIC samples to prepare the works to go back into supply.

My team and I are signing off the MIC form for Kedington and this is the primary task we are involved with associated with this works.

The MIC forms are sectioned into Parts A, B, C and D. Part A is completed by the @One alliance project team. My team then check the products and approvals and sign off Part A of the form if all materials are approved. Acothane was added to the form as this was what the contractor intended to use. However it was later removed as the contractor changed their decision to use the Acothane product. On the form a strikethrough was used to indicate that Acothane was not used.

The inlet and overflow pipework was replaced within the Kedington works tank (this was what I went to see on the 15 August 2022). NatCem is then around the outlet pipework, encasing it completely. I believe this was to give it banking to prevent sediment from building up, to keep the design of a raised outlet. I don't know if there was an issue with this outlet pipework regarding Regulation 31 approval.

I was involved with the taste and odour trials which started in June 2020 and are still ongoing. I was one of

Signature: [REDACTED]

Continuation Statement of:	Statement of: [REDACTED]
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the water quality representatives on the project group. The trial was done in stages. I did not do any site work but reviewed results and the reports. Sodium Bisulphite (SBS) dosing was the remedial solution decided upon. The project identified that polysulphides were being produced in the raw water, SBS dosing has now been installed and is currently in its performance testing phase. We have yet to sample the final blend in the reservoir live (Kedington Final water treatment point which is at the inlet point to the reservoir) as the site is not in supply. We have tested the blend using bench-scale experiments and using synthetic blends, both on site and in the laboratory. I believe we have done all we can to test and check the blend.

I was involved with some soak testing on the 5 November 2021 on new identical pipe to replicate what might have happened in the tank. Two different waters were tested (chlorinated and not chlorinated). The sister site at Great Wrating works was used to do the soak testing. Two temporary tanks were brought onto site and the Kedington borehole water was used to complete the tests. These were visual soak tests only and showed the paint flaking at the end of the testing when the pipes were removed. Visual inspections were undertaken weekly and it was not obvious until the pipes were removed that there was some flaking.

A leachate test was completed in 2021 on the paint flakes themselves from the actual pipes removed from the original Kedington tank.

Since the event, water quality updates have been issued around Regulation 31 and MIC form updates. The communications out to the business have been general but it is expected that more specific learning will be communicated out once the investigation has been completed.

The MIC form has been revised to make the sections clearer, and there is a bigger project of work on the MIC process to review the whole system and how stakeholders are involved with the sign off process. The Instructions for Use (IFU) are now asked for as part of the MIC form. The IFUs are not specifically reviewed but the risk scientists now check that the contractors have a copy of the IFU and that the version numbers match the approved product list. In addition to this a secondary check has been implement with the @one alliance partners. There are now three signatures for the sign off; the first being the engineer entering item details, the second is the @one alliance partner checker and the third is the risk scientist.

Signature: [REDACTED]	Page 2 of 2
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(Criminal Procedure Rules, r16; Criminal Justice Act 1967, s9)

Statement of:

Age of witness (if over 18 enter "over 18"):

Over 18

Occupation
witness:

of

Risk Scientist

This statement, consisting of pages each signed by me, is true to the best of my knowledge and belief and I make it knowing that, if it is tendered in evidence, I shall be liable to prosecution if I have wilfully stated in it anything which I know to be false or do not believe to be true.

Signature:

Dated:

17/5/2022

Signature:

Page 1 of 3

Continuation Statement of:

Statement of: [REDACTED]

My name is [REDACTED] at the time of the event I was a Risk Scientist in the Water Quality Risk and Optimisation team. I have been working for ANH since 2012. I started as a Risk Scientist in 2016 and I am still undertaking the same job role. I understand that the Inspectorate was notified of the event at Kedington WTW due to products/material had been installed incorrectly and/or were not Reg31 approved.

As a Risk Scientist I review the completed Materials in contact (MIC) form and countersign Part A if the information provided is satisfactory. I would report any unusual findings to my line manager who is [REDACTED]. I completed and passed the MIC classroom training in 2016. I have also completed the online training course which is done every three years. The classroom training covers Reg31 and how to fill in and review MIC forms. MIC forms can only be completed by those that have completed and passed the classroom training. I completed all the required training before the event. Since the event in 2020 I have repeated the online MIC training course – Aug 2021 – in accordance with the required training.

The Kedington scheme is a new groundwater treatment work that was built to provide a metaldehyde blend with Great Watting WTW. It is a filter treatment work with pre-chlorination due to elevated iron and manganese. The @One Alliance is delivering this AMP6 engineering scheme. My involvement in this scheme was to create and distribute a new blank MIC form when requested by the Project team. I then reviewed and countersigned Part A on the form following completion by the Project team. The Project team list in Part A all items installed that will come in contact with water intended for supply. Information provided on the form includes supplier, manufacturer, product name, brief description of material in contact with water, confirm small or large surface area, approving body, approving reference number, confirming that Instructions for use or conditions for use have been checked and can be met. The Project team member signs off each item on the MIC form. I then review and countersign Part A based on the information provided on the form. It is the Project team member that is responsible to check and confirm that the Instructions for use can be met. I would carry out a site visit if it was requested. In this instance there were three Project members completing Part A, each of these members report to [REDACTED]. Kedington WTW is within my Supply area so only I have countersigned the form as a Risk Scientist. Everyone who is working with MIC forms must attend the classroom training prior to completing the MIC form Part A. We have access to the MIC training Log so we can check who has passed the training if unsure. I do not know who from the Project team that has the main responsibility on site for the product installation and to ensure that the Instructions for use are followed.

Line 123 on the MIC form relates to the pipework that should have been installed in the tanks. This pipework – *System CL* - has been installed on site and therefore is correctly listed on the MIC form under 'Cross site pipework'. The items that were installed inside the contact tank and balance tank are not listed on the form. *Electrofresh Plus* from Electrosteel was installed instead of *System CL*. *Electrofresh Plus* is a Reg31 approved pipe but not approved for submersion. I had no correspondence stating that these items had changed, and the MIC form was never updated by the Project team to reflect this. I do not know why they changed the pipework. I understand that the contractor is responsible for selecting what to install, ensuring that the product is Reg31 approved and that the Instructions for use will be followed. I countersign the MIC form to confirm that the products selected is meeting Reg 31 approval based on the information provided. I do not know how the Project team carry out Instructions for use site checks and how this information is reported or shared within the team.

I was first informed about the blue flakes in the tank on 27 May 2021 in connection with the one-year warranty inspection. I went to site on 28 May 2021 to have a look inside the tanks.

The MIC sampling associated with approving the specific pipework, located inside the contact tank and balance tank, are contained in rows 326-328 of the MIC form which is included in the 20-

Signature: [REDACTED]

Continuation Statement of:

Statement of: [REDACTED]

day report folder, Appendix 6. I understand that the water used for the MIC sampling was post filter water with no chemical addition, therefore classified as partially treated water (row 326). There was a 16-hour standing time before dip samples were collected from each tank. Rows 327 and 328 show the Lab results from these dip samples. The water quality after 16-hours standing in the tanks were the same as the upstream comparison sample. Any effect of chlorine on the pipework would be tested during the 7-day commissioning (run to waste) sampling. The commissioning samples are included in the three-day report folder, Appendix 2. We carried out a comprehensive sample survey with the chlorine addition whilst the site was running to waste. We normally sample for 7 days but in this instance the commissioning sampling was over a period of 10 days. This enabled us to check that there were no water quality concerns prior to going into supply. I sign off the sample results in Part C on the MIC form to confirm that they are satisfactory or whether there are any additional actions, such as resampling, that need to be taken. At the bottom of the MIC form the 'permission to go into supply' is normally signed by the Risk Scientist but as this is a new treatment work which includes an Into Supply Major Impact plan the final approval is given by the Regional Supply Manager.

I am fully aware that there was an into supply deadline for this new treatment work and that the site was taken out of supply on 31 March 2020 to complete further work on the automatic control system. However my involvement in this project has been water quality related and I was under no time pressure.

When the treatment work was put into supply, performance samples were collected on 31 March 2020, included in Appendix 4 of the 3-day report. The performance samples were of the blended water with Great Watting WTW. There are no samples from Kedington WTW only. On the 31 March 2020 there was a quantitative odour descriptor of 'musty', this was a panel of three people testing a de-chlorinated sample at 25°C. One person in the panel of three described the odour as 'musty'. This would not be classed as a quantitative odour failure as it would need to be two or more panellists failing the sample. There were a couple of other performance samples that had single panel member detections of 'musty' or 'bad egg'. Again, these would not be classed as quantitative odour failures. On the 11 May 2020 there was a 'bad egg' quantitative odour failure (taste also failed as refused to taste) as two people detected this odour from the blended water sample point with Great Watting. Kedington WTW was removed from supply on the 14 May 2020 due to the odour results. Sample exceedances are reported through to the Water Quality Duty Scientist who would escalate the results to the Water Quality managers. I was made aware of the works being taken out of supply.

I do not know why the pipework was changed which was the root cause of the event. We have done changes to the MIC procedure and the form has been updated. Each MIC form is now saved in individual folders where the person completing Part A saves all the relevant Instructions/conditions for use and BS6920 reports.

Signature: [REDACTED]

(Criminal Procedure Rules, r16, Criminal Justice Act 1967, s9)

Statement of:

Age of witness (if over 18 enter "over 18"):

Over 18

Occupation of witness:

Senior Civil Engineer

This statement, consisting of pages each signed by me, is true to the best of my knowledge and belief and I make it knowing that, if it is tendered in evidence, I shall be liable to prosecution if I have wilfully stated in it anything which I know to be false or do not believe to be true.

Signature:

Dated:

10/08/2022

My name is [REDACTED], I work full time for Anglian Water, Thorpe Wood House, Thorpe Wood, Peterborough, PE3 6WT. I am a senior civil engineer and at the time of the project, the project manager was [REDACTED] the design manager changed several times throughout the project. [REDACTED] was my main point of contact. There were multiple civil engineers on the project, two from Mott MacDonald ([REDACTED] and his junior [REDACTED].

I had completed the mandatory training prior to working on the project, this training was all encompassing on water hygiene and regulation 31, materials in contact training.

The scheme started early in AMP 6, I joined the project in approximately 2017. [REDACTED] reported to me after [REDACTED] left the project as I was the senior civil engineer. As a senior engineer I was responsible for designs, drawings and collaboration with other team members responsible for other disciplines.

[REDACTED] was one of the mechanical engineers on the project, he was responsible for drawing WAT-06742-KEHRWW-1F-DET-5302. [REDACTED] was the designer of the pipework above ground. As a civil engineer I was responsible for pipework below ground. Our typical cross site pipework was ductile iron meeting the standard BSEN 545. I did not put any pipework inside the tank. The wall coupling would have been provided by FLI Carlow as part of their pre-cast concrete. This was a viking-johnson wall coupling as far as I am aware. The Kedington tank sits at ground level, so the majority of the pipework was above ground and not my responsibility.

The washwater system was below ground and Regulation 31 applies because the supernatant is returned to the head of the works. I did not know that there were any organics failures from the wash water return commissioning samples. The engineering team do not check the installations. We are largely desk-bound and by the time it comes for construction we are either finishing off paperwork for the project or starting work on another project.

The line on the MIC form is a general line containing information on pipework, my name is against it because I was responsible for the below ground ductile iron, cross site pipework.

I first became aware that there was an issue with the pipework in 2021, I heard that the coating was shedding inside the tank. I heard that there was ductile iron pipework inside the tank. People were coming around asking questions whether it was System CL or System XL pipework. I was never fully in the loop on what the whole problem was. I was asked about the internal pipework but I explained that I was only responsible for the below ground pipework.

I first entered the Kedington tank in early 2022 to look at some minor concrete defects caused by wear and

Signature:

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Continuation Statement of:

Statement of: [REDACTED]

tear within the tank. When I went into the tank I saw that the pipework in question had been replaced with stainless steel.

I believe that the site is still awaiting sign off due to outstanding remedial work. [REDACTED] is handling the project from the At One, Anglian Water side. [REDACTED] would go through the project hand over process. I believe that there would be a snagging list but I am a design engineer and so unless there is something I specifically need to action I would not have sight of the snagging list. This would be [REDACTED]'s responsibility.

Signature: [REDACTED]

Page 2 of 2

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(Criminal Procedure Rules, r16; Criminal Justice Act 1967, s9)

Statement of:

Age of witness (if over 18 enter "over 18"):

Over 18

Occupation of witness:

Pitsford Supply Manager

This statement, consisting of pages each signed by me, is true to the best of my knowledge and belief and I make it knowing that, if it is tendered in evidence, I shall be liable to prosecution if I have wilfully stated in it anything which I know to be false or do not believe to be true.

Signature:

Dated:

11/08/2022

My name is [REDACTED] I work full time for Anglian Water based at Pitsford water treatment works, Grange lane, Pitsford, Northamptonshire, NN6 9AP.

I started at Pitsford as an electrical technician in 2009. After this I moved to Grafham treatment works in 2012 as a enhancer (technican role), I then became a senior technician (later named supply support manager) from 2014 to 2015. I then moved back to Pitsford as a supply manager at the beginning of June 2017, taking over from [REDACTED] I finished the Licence to Operate training before starting in the supply manager role and received my certificate in September 2017.

I have completed materials in contact training, this used to be a classroom session but is now a 3 yearly e-learning. I have also completed water quality training including POSWSH, water quality sampling, licence to operate as a supply manager, I also have the National Water Hygiene training. I have also completed impact plan training. My learning history is up to date and I have completed all the mandatory training.

From what I understand from leadership meetings and internal comms through business bulletins and water quality updates the business installed some unapproved pipework at a site up North. This prompted the company to look at other jobs completed by the alliance, taking storage points out of supply for checking. The leadership team told me that they had found issues in Diddington and that they needed to check the Pitsford tank B. I was told to take the Pitsford tank B out in 2021 and this was when the company identified that there was unapproved pipework in the tank.

I was not aware of any pipework issues since I started in 2017. The tank has been out a few times, in March 2021 there was a coliform failure and the tank was inspected. The reservoir engineer ([REDACTED]) only identified ingress into the tank through leaking hatches, no other issues were identified. I do not believe [REDACTED] was the inspection engineer in 2017. No issues were escalated on the condition of the pipework during the 2021 inspection.

The At One alliance pipework jobs were all completed before I started as the Pitsford Supply Manager. All we had to do was put the tank in and [REDACTED] lead on this whilst I familiarised myself with the area and the AMP 6 schemes and also recruited for some vacancies. [REDACTED] and [REDACTED] were involved with liaison with At One at the time of construction and so I let [REDACTED] continue working on the project. By the time I joined Pitsford in June 2017 all the contractors had left site, the area of site that the contractors were working on had already been officially handed back over to Anglian Water. I have not seen the MIC form for the work completed. I do not believe I signed this off.

The water quality team review the MIC form and impact plan, once there is confirmation that the MIC form is signed off the tank is then filled, stood for 16 hours and the MIC samples are then taken. This forms the

Signature:

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Continuation Statement of:

Statement of: [REDACTED]

actions taken as part of the impact plan.

I recently went into the tank at Pitsford on the 17 December 2021 with [REDACTED] [REDACTED] another scientist and [REDACTED] who is one of my mechanical engineers. [REDACTED] does all of my reservoir and tower programme, he is responsible for the impact plans and does external inspections. We went into the tank because I was keen to go in a see what the issues were. I saw that there were parts of the pipework flaking which I took photographs of. The 90 degree elbow looked absolutely fine and the bellmouth also. It was the connection between the bellmouth and the 90 degree bend and the section through the wall that was flaking. [REDACTED] took some of the flaking bits away as a sample for the laboratory to analyse, I have not heard what the results were. I do not believe that a root cause has been identified.

I was involved in the Pitsford tank A work in approximately 2020. The tank was signed off to the contractors and At One core drilled the wall to install the Hannington resilience pipework. Stainless steel 316 pipework was installed, [REDACTED] was the Assurance Manager on this project working with the alliance, [REDACTED] was my Supply Support Manager (starting in Mid-August 2017) at the time of this work who would have been supporting the impact plan completion for the project. The design team specified stainless steel 316 pipework and I was happy with this because I do not like using anything else. Tank A was just the inlet pipework, the project went really smoothly, it only took a few weeks. From what I remember there were no problems. The only slight issue was the embankment on the reservoir as this needed some additional work to tidy up the embankment relating to grounds maintenance.

Tank B remains out of supply, the Alliance have been in and removed the pipework and put it into storage at Grafham. I understand that all the unapproved pipework from all the events is in storage at Grafham. The pipework is all labelled so that it can be identified where it originally came from. I do not know if materials testing has been completed. I believe that new pipework was installed approximately 3 weeks ago around the end of July 2022. Tank B is not yet in supply. Not having Tank B in supply is causing some operational issues as storage is reduced. Pitsford Final had a coliform failure in March 2021 and the water quality team advised that I needed to remove both storage tanks and the contact tank for inspection as part of the water quality action plan in response to the coliform failure. We decided to inspect Storage tank B first as this was the oldest tank ready for inspection. I did not want the contact tank out during the summer so the storage tanks were targeted first. We did Storage tank B and then storage tank A, then the pipework material issues arised and I was asked to take tank B out again. I am still yet to take out the contact tanks which are being plannd for winter 2022/23. Once this is done the water quality actions relating to the coliform failure will be completed.

Signature: [REDACTED]

(Criminal Procedure Rules, r16, Criminal Justice Act 1967, s9)

Statement of:

Age of witness (if over 18 enter "over 18"):

Over 18

Occupation of witness:

Asset Delivery Planning and Systems Solutions Developer

This statement, consisting of pages each signed by me, is true to the best of my knowledge and belief and I make it knowing that, if it is tendered in evidence, I shall be liable to prosecution if I have wilfully stated in it anything which I know to be false or do not believe to be true.

Signature:

Date:

10/08/2022

I am [REDACTED], I work full time for Anglian Water based at Anglian Water, Thorpe Wood House, Thorpe Wood, Peterborough, PE3 6WT. At the time of the project, I was a supply support manager at Pitsford, reporting to [REDACTED]. I started this position in approximately late 2014, I did not have any direct reports. I went to work for the IOS Alliance under Kier in 2017. I returned to Anglian Water in April 2021.

I understand that some unapproved pipework was installed inside storage tank B at Pitsford. I only found this out when I was contacted for the DWI witness statement.

The project was part of Pitsford Resilience and so there was a lot of activity happening across the works. The aim of the pipework was to integrate Pitsford with Hannington using the final water pumps to maintain the supply of water into the network.

The construction site was signed over to the contractors for the project. The sign over was done by the site manager who was [REDACTED]. I was not involved with the procurement side of the construction. The impact plan would have been used upon returning to supply in consultation with the water quality scientist for the site. The impact plan requires sign off by all stakeholders including the supply manager ([REDACTED]) before it is actioned. I used to write impact plans on a daily basis as I was responsible for the reservoir and tower programme, I was not heavily involved with capital projects such as storage tank B at Pitsford (Pitsford Resilience). I was involved with removing the assets from service. The impact plan would be written, an out of supply trial would be undertaken and then if that was successful the site was taken out of supply fully. I was not involved with the construction or remedial work that was undertaken within the tanks.

The reservoir inspection engineers would enter the tanks and identify the recommended remedial works, they would then organise the Materials in Contact (MIC) form and organising the contractors. I would supply the works technician to support sampling for the return to service, the sample results would be signed off by the water quality scientist and the tank would only be returned to supply if these passed.

The impact plan was an end to end plan from project start to finish. It is a very methodical form, you have to take samples and you have to follow the instructions for return to supply. I cannot recall whether I was involved with the impact plan process for the into supply of storage tank B at Pitsford.

The reservoir engineer did not highlight any issues with pipework in the tank before we returned to supply. The reservoir engineers were relied upon as the experts.

I remember an algae incident at Pitsford and so the tank was brought back in. We were doing a lot of work on site to keep it in supply. The tank was brought back in but still under an impact plan that was signed off with samples taken. I am not sure what water source was used to put this tank into supply, it may have been from

Signature:

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Continuation Statement of:

Statement of: [REDACTED]

Hannington due to the issues at Pitsford. The works technician was [REDACTED] it is likely that the whole operational team was involved with putting this tank into supply as it was an emergency situation. We had to flush lengths of main before we could fill the tank so the capital project team delivering the work would have had to be involved. There would have been a sign off before this tank was put back into supply.

I have never been in tank B at Pitsford, I have only looked in through hatches. I do not remember any specific taste or odour issues or sampling failures with the tank being returned to supply.

The project was very prolonged and disjointed. It seemed like the project managers were not running the project very well. [REDACTED] did not understand the basics of what we were trying to achieve with the project. The treated water investment group were questioning the delays. [REDACTED] would feed this back to [REDACTED], [REDACTED] and the operational teams almost indicating that we were causing the delays. I made sure we followed the correct impact plan procedures. I sometimes felt under pressure to sign things off that were not ready to go, I always made sure I only signed items off that I was happy with and that met the required standards. [REDACTED] (working for MWH) was the on site manager, overseeing activities on the ground. [REDACTED] was a project manager in charge of the scheme, [REDACTED] would run a lot of the meetings. [REDACTED] would write a lot of plans for the construction, such as flushing plans. [REDACTED]'s plans always seemed to be quite robust but they would always went through the sign off process which included supply, scientific, networks (if applicable) and then the Operational Management Centre would have a final check of the plan. Once all these parties had approved the plan, the document was given an approval number.

Signature [REDACTED]

(Criminal Procedure Rules, r16, Criminal Justice Act 1967, s9)

Statement of: [REDACTED]

Age of witness (if over 18 enter "over 18"):

Over 18

Occupation of witness:

Bedford Supply Manager

This statement, consisting of [REDACTED] pages each signed by me, is true to the best of my knowledge and belief and I make it knowing that, if it is tendered in evidence, I shall be liable to prosecution if I have wilfully stated in it anything which I know to be false or do not believe to be true.

Signature: [REDACTED]

Dated:

10/08/2022

My name is [REDACTED] I work full time for Anglian Water base at Clapham Water Treatment Works, Bedford Road, Clapham as the Supply Manager. Between 2012 and 2014 I was a Senior Technician and between August 2015 to July 2017 I was the Pitsford Supply Manager. My responsibilities were management of the team of approximately 17 direct reports and for the assets to deliver drinking water for supply.

I recently became aware of the event through business bulletins giving an overview of what was going on and through contact requesting the DWI witness statement.

No work was completed in storage tank A before tank B work began. From my memory storage tank A had not had any work done before I left my role at Pitsford. My understanding of the work was that for resilience, Hannington would be connected into Pitsford tanks. At One alliance completed the connection into storage tank B, they then had issues getting it into service because there was a leaking outlet penstock valve. To rectify the leaking outlet penstock valve another chamber was built with a second penstock valve installed so that the two tanks could be hydraulically isolated. From when the penstock valve was repaired to the algae incident I cannot remember whether storage tank B ever passed samples and got into supply.

I was responsible for handing part of the Pitsford site over to the contractors for the capital work to commence. The teams involved in the scheme were Stonbury Ltd., [REDACTED] was a consultant and [REDACTED] and [REDACTED] were individuals involved who I believe were from the At One alliance. Stonbury were the main contractor.

The project ran fine from my point of view. They did the connection into storage tank B. I didn't have a lot of involvement, I never went into the tank or inspected any part of the work. I was not aware of any issues with pipework or materials used.

I do not know if the reservoir inspection engineer went into the tank prior to the night of the algae incident. I do not know who carried out the leaking penstock valve repair work.

I do not remember seeing the materials in contact form for the capital works completed.

I did sign off the impact plan for the specific site area to be signed over to the contractors for the connection into storage tank B. I do not remember anything regarding impact plans or signing off for returning the tank back into supply, including the night of the algae incident.

I recall a fixed overland pipe that went from the Hannington main and into storage tank B, this had been a back up preceding the new inlet pipe from the Hannington main.

Signature: [REDACTED]

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Continuation Statement of:

Statement of: [REDACTED]

There was a period when there were algae issues at Pitsford in October 2016. A temporary pipe arrangement was set up from the Hannington main into storage tank A at the time of the algae issues but this was never used. When the algae issues occurred there was an emergency planned job to bring storage tank B into supply using the new pipework from the Hannington main that had been installed by At One. The tank B was inspected the evening it was returned to supply in the emergency. I believe there were samples taken before the tank went into supply at the time of the algae emergency. The algae was blinding everything at Pitsford, it was in the raw reservoir, primary ozone was dosing as much as we could, the algae got all the way through to Granular Aactivated Carbon. We were worried we would lose the works and so storage tank B was brought into service. I am not sure if the incident team was open for this event, I think it was the west supply team that was mainly involved.

I left Pitsford in July 2017, I cannot recall if the tank came back out of supply after the algae emergency. I do not recall any defects being reported on the tank at the time the reservoir engineer inspected the tank, the evening of the algae emergency.

The Quality Assurance team would meet with me to provide feedback on the work being completed by At One alliance partners. Anything out of the norm would come to us, with these schemes we would be involved for potential operational issues. Health and Safety is managed by the contractor. If the contractor left their marked area on site they would need permission to enter my side of the site. At the start of the project there is a collaboration between all the parties involved, myself and the contractors. Once the work and area is signed over to the contractors they run with it and my involvement becomes minimal.

The contractors manage all the products and materials for the capital work. They had a dedicated area for them to use whilst they completed the job at Pitsford.

Signature: [REDACTED]

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(Criminal Procedure Rules, r16; Criminal Justice Act 1967, s9)

Statement of:

Age of witness (if over 18 enter "over 18"):

Over 18

Occupation of witness:

Project Manager

This statement, consisting of pages each signed by me, is true to the best of my knowledge and belief and I make it knowing that, if it is tendered in evidence, I shall be liable to prosecution if I have wilfully stated in it anything which I know to be false or do not believe to be true.

Signature:

Dated:

08/08/2022

My name is [REDACTED] I am a Project Manager working at FLI Water Ltd. Unit B, Regent House, Wolseley Road, Kempston, Bedford, MK42 7JY. Our client in all of the work was At One (the alliance) that was part of the Anglian Water Framework. I have never formally been trained on Regulation 31 by Anglian Water. I am aware of Regulation 31 from my own experience and FLI Water have a very experienced design manager for this project who knows Regulation 31.

The original contract for Kedington included a statement that for any material in the contact tank it was to be epoxy coated carbon steel. That is an industry standard material, the carbon steel gets dipped in a specified DWI approved epoxy coating. That is what we were originally going to install in the contact tank, all other pipe in contact with potable water was epoxy coated carbon steel or stainless steel. That contract was signed in September 2018. On the 17 July 2019 (09:50) FLI Water received an instruction email from the At One Alliance cost manager ([REDACTED]), under the instruction of the At One Alliance Project Manager ([REDACTED]) for a change of material. The email stated no need for a project managers instruction sign off and that there was to be a change in the materials used for the contact tank. The material change was from carbon steel coated in fusion bonded epoxy to ductile iron. The email included a list of all the materials to be used and a drawing of the contact tank and the specific pipework required in it (reference: WAT-06742-KEHRWW-1F-DET-5302, Revision 2, Status 'C' (For Construction)). The drawing included a reference to WAT-06742-KEHRWW-SS-DET-5990 however the company never supplied this drawing. FLI Water utilised the standard drawing with the correct reference for Great Watting WAT-06742-GWRAWW-SS-DET-5990. This is a standard document and so the site code change does not make a difference to the content of the document. Point 8 of the Ductile Iron Notes includes a statement 'unless otherwise stated, the coatings for fittings will be bitumin or epoxy'. Whereas, had the original contract order been placed, we would have been working to point 8 under the Carbon Steel Notes the exact epoxy coating is specified and requires Scotchcoat (Fusion 206N) and it also tells you how thick the pipe coating needs to be.

I believe that the change in material may have been done because the Project Manager was trying to accelerate the programme. The material change made delivery time quicker because there is a longer lead time for fusion bonded epoxy coated pipe. I wrote back to At One Alliance on the 29 July 2019 stating that this was a 'compensation event' which means that the change in scope may have resulted in a change to the contract value. [REDACTED] replied stating that much of this was in FLI Water's scope and that it was just a change in the material type. There was no mention of Regulation 31, I was told to put ductile iron in the tank from the drawings that were changed. The only specification was that the pipe was made to BSEN 545. With knowledge of DWI requirements I knew that the pipe would at a minimum need WRAS approval. On the 17 July 2019 (15:35) I wrote to FT Ductile to obtain a quote for the new materials, as instructed by the At One Alliance. I specifically wrote in the email to FT Ductile that the parts were for Potable Water and that approval numbers would be required. I included the drawings which showed that the pipework was inside the tanks.

Signature:

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Continuation Statement of: Statement of: [REDACTED]

I then received the quote back from FT Ductile on the 22 July 2019 which included a statement that FT Ductile could supply the relevant WRAS certification for the Ductile pipes and fittings.

On the 01 August 2019 I sent the purchase order to FT Ductile with all the parts I required. This included a statement that the goods supplied under this order must comply with Regulation 31 of The Water Supply (Water Quality) Regulations.

The delivery note confirmed that the order placed was the same as the goods received on site. The item numbers all match my original order. FLI Water teams fitted the pipes that were delivered.

My completion certificate for FLI Water's part of the work was dated 17 June 2020. This was supposed to be signed off by [REDACTED] but he never signed it off.

In June 2021 At One alliance got back in touch. I had a call asking whether the pipework installed was Regulation 31 approved. I told them that FLI Water put in what we were told to put in. [REDACTED] got involved stating that At One needed to know whether the pipework was approved for continuous immersion. Once FLI Water had been told that there was an issue I got in touch with FT Ductile. The findings from FT Ductile confirmed that all the fittings were approved but that the straight lengths of pipe which were cement lined and seal coated had an external coating that was not approved for submersion.

In discussions with At One in June 2021 I stated that FLI Water never specified that the pipes should be suitable for continual immersion in potable water to FT Ductile. [REDACTED] told me that we should have known that the pipe was for full submersion. I acknowledge that I did not specify the pipe needed to be suitable for continuous immersion in potable water to FT Ductile when placing the order. However, the drawings and materials lists from At One did not specify this either and as this was their instruction to us I feel that At One should have specified this. If they had specified on their drawing that the pipework needed to be approved for continuous submersion the failure to comply with DWI approval would not have occurred because all parties involved would have been clearly advised and aware of that terminology. I told [REDACTED] again that FLI Water installed what was requested and that in their materials change request At One did not specify that the pipe was to be submerged. The materials change request changed the material from carbon steel to ductile iron. It was this change in material from a more industry accepted pipework that caused confusion and resulted in the issue. The lack of exact specification on the material change instruction caused the issues. We were never given specifics on the coating of the ductile iron.

FLI Water were hit with a defect note on 08 June 2021 (Reference: DEF@(1)) 'Paintwork of internal pipework has failed leading there to be paint flakes in the tank'. By the 22 June 2021 FLI Water were required to reply and come up with a solution.

I got back to [REDACTED] on the 15 June 2021, I offered FLI Water to find and help with the solution. [REDACTED] was stating that they would replace the pipe with stainless steel, I offered FLI Water to support the solution. On the 17 June 2021 I again offered to support the work to resolve the issues. I stated on the 17 June 2021 that FLI Water would replace the pipe with stainless steel or ductile iron with an approved external and internal coating suitable for continuous submersion. I had no further correspondence from [REDACTED] regarding remedial work until the 16 November 2021 stating that At One were going to try and recover all of the costs from us.

During June 2021 I had email correspondence with [REDACTED] who was the lead mechanical design engineer from At One alliance. He was tasked with finding all the approval numbers for the products used. There was a lot of emails between FLI Water and FT Ductile and then between FT Ductile and Electrosteel, the pipe manufacturer, to identify the products used. The external coating of the pipe bends, bell mouths and fittings was WRAS approved. On the 18 June 2021, I received confirmation from FT Ductile that the straight lengths of pipe were provided by Electrosteel Castings and this pipework was WRAS approved on the internal and external surfaces of the pipe. On the 18 June 2021 at 08:37 I received an email stating and attaching the

Signature: [REDACTED]

Continuation Statement of:

Statement of: [REDACTED]

WRAS approval for the standard blue epoxy coating for the external of the pipes. I emailed [REDACTED] the WRAS approval certificate I had received from FT Ductile but stated that I was confused as verbal conversations with FT Ductile had suggested that they thought the pipe was not approved. [REDACTED] replied stating that we needed to be 100% sure of the information, as we had received conflicting information. [REDACTED] from FT Ductile then got back to Electrosteel and later confirmed on the 18 June 2021 at 12:03 that the pipes are DWI Regulation 31 4(a) approved for the transportation of drinking water but not for total immersion. The Fusion Bonded Epoxy powder coating is WRAS approved and therefore compliant to the requirements of Regulation 31 (4) (b) (small surface area contact) for the transportation but not for total immersion. Electrosteel added that they would always recommend steel products coated internally and externally with a DWI approved coating (Regulation 31(4)(a)) for total immersion in drinking water due to contact times. If At One had not made the material change and kept to the original contract the error would never have been made. If the word 'continuous immersion' had been used on the drawing/ specification for the new material change this confusion and subsequent materials error could have been avoided.

I assured [REDACTED] that all the fittings were approved but that the straight lengths of pipe had an outer coating that was not approved for full submersion. The supplier (FT Ductile) was sent the drawing that [REDACTED] supplied on the 17 July 2019.

At the end of August 2021 I was told verbally that At One wanted to have a private and confidential meeting. I said that I wanted sight of the report before the meeting so that FLI Water could prepare answers to questions, I even offered to sign a confidentiality agreement. At One would not provide me with the report. On the 16 September we met and on the 01 October 2021 we met, both meetings via MS Teams. At One went through everything again in detail. At these meetings I was told not to put anything in writing. After the meetings I sent [REDACTED] various approval certificates but with no email text included as per the instruction from At One.

I feel that FLI Water has wrongly been made to feel responsible by At One for the failure to comply with the DWI Regulation 31 requirements. FLI Water stand by the statement that we only worked to the specification At One supplied to us and the material change that At One chose to make.

Signature [REDACTED]

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(Criminal Procedure Rules, r16; Criminal Justice Act 1967, s9)

Statement of: [REDACTED]

Age of witness (if over 18 enter "over 18"):

Over 18

Occupation of witness:

Director of FT Ductile

This statement, consisting of [REDACTED] pages each signed by me, is true to the best of my knowledge and belief and I make it knowing that, if it is tendered in evidence, I shall be liable to prosecution if I have wilfully stated in it anything which I know to be false or do not believe to be true.

Signature: [REDACTED]

Dated:

02/08/2022

My name is [REDACTED] I am the Director of FT Ductile (now a trading division of FT Pipeline Systems), the business address is Unit 6B Eastern Park, Eastern Avenue, Lichfield. I work full time for the company. I report to the Chairman [REDACTED] I have six direct reports. I am responsible for sales and the technical orientation of the business. I am responsible for the day to day running of the Division. Myself and [REDACTED] worked on the Kedington WTW project. We worked with [REDACTED] from FLI to deliver the project.

I was informed that the pipework needed to meet Regulation 31 approval at the time the order was placed. The certificates associated with the pipework show that the pipework meets the requirements. The pipework was from Electro-steel barrel which is an approved product. All the flange pipework was from Electro-steel pipe and this was approved for the transfer of water inside the pipe. What we were not told was that the pipe would be submerged. The fittings were fusion bonded epoxy coated which was applied on the internal and external of the fittings.

We have certification from Electro-steel confirming that the pipework ordered was correct. The products were stamped to confirm that they met the EN545 standard.

[REDACTED] was the main point of contact for the job. On 22 July 2019 [REDACTED] (working for FLI) first initiated discussions on the order, the company required WRAS approval on all the pipework before placing the order. The company required everything to be delivered within three weeks.

No one from Anglian Water contacted us to raise any concerns regarding the pipework when it was delivered in August 2019. The bell-mouth was recoated prior to installation in September 2019 due to some chips on the blue outer coating, this pipework went back to the factory for re-coating in Resicoat 4, which is approved. Once the bell-mouth had been re-coated it was installed into the tank.

I was contacted by [REDACTED] on the 03 June 2021, last year when the event was recognised. [REDACTED] requested details on the pipework as the company were trying to establish the cause of the blistering on the outer side of the pipe.

FT Pipeline Systems provided Anglian Water with some test pieces of pipe in August 2021, the actual electro-steel paint was left exposed so that the water company could complete testing. I have not been told the results of this testing.

I have not been directly contacted from Anglian Water regarding this statement, I have been on some conference calls with Anglian Water to support their investigation into the event and find out what happened. Anglian Water have not audited us before. FT Pipework Systems have a thorough filing structure for all jobs, the company keeps up to date with the ISO quality management certification, we are also Achilles accredited.

Signature: [REDACTED]

Continuation Statement of:

Statement of:

Signature:

(Criminal Procedure Rules, r16; Criminal Justice Act 1967, s9)

Statement of: [REDACTED]

Age of witness (if over 18 enter "over 18"):

Over 18

Occupation of witness:

SKANSKA Project Delivery Manager

This statement, consisting of [REDACTED] pages each signed by me, is true to the best of my knowledge and belief and I make it knowing that, if it is tendered in evidence, I shall be liable to prosecution if I have wilfully stated in it anything which I know to be false or do not believe to be true.

Signature: [REDACTED]

Dated:

18/5/22

My name is [REDACTED] My job title at the time of the event was Project Delivery Manager for SKANSKA. I was the project manager for delivering the scheme. I reported to the Integrated Project Leader who was the lead for a programme of work. This was [REDACTED]
I have been in major contracting for the last 30 years with the last 20 years in water, waste and utilities. I have been POSWSH trained and trained on the processes and procedures for AW.

For Reg 31 I have had the POSWSH familiarisation training. I am not MIC form trained however, the MIC form is embedded into my work and there is a checklist process to go through. In terms of the sign off, although my name is on the form, the administration of the form is the technical manager and the engineer. I am not trained in filling in the MIC form. The Technical manager and the engineers fill in the form and then send to the AW risk scientist. There is a procedure for the MIC form on the Alliance side. Completion and sign off of the MIC form is part of the 'into supply impact plan.'

There is a specification that we would follow for each project that will define what type of materials we use for each piece of work to be completed.

The scheme at Kedington was instigated as there were two main issues to be resolved at Great Wrattling. There was a pesticide risk. In addition the Great Wrattling works only provided a single source to the supply area. Kedington was created to blend with Great Wrattling to reduce pesticide risk and create a second source for the area. Kedington has a simple works process.

The individuals who signed off the MIC part A form are responsible for the products installed. These individuals have specific training on how to fill in the form. Where the @one Alliance directly buy the individual components on the form those sign off engineers would be part of the procurement process. If a third party contractor is used then that contractor is responsible for the procurement and the engineers would provide a template that is used between @one Alliance and the third party to check the products are correct. This is an abstract of the MIC form.

In this instance the contractor (FLI Water) was to provide the material. The contractor got the incorrect material, it was supposed to be ductile iron pipework that was suitable for submersion. The contractor bought a ductile iron pipe that was not approved for submersion. When the engineers checked the forms they saw that ductile iron pipe was referenced on the form - however this was not for the material for the contact tank pipework. .

The pipes were found to be blistering in May 2021 when there was an inspection at the 1 year post installation checks.

Signature: [REDACTED]

Continuation Statement of:

Statement of: [REDACTED]

@one Alliance issued FLI Water a set of drawings with details on the pipework. The drawings would have shown ductile iron pipe. The context would have been there showing the tank and that the pipes were submerged in the tank. The third party contractor has not realised that the pipe was submerged. They have not understood the context.

The MIC form includes Saint Gobain pipework which is the underground pipework installation. What the MIC form failed to include was the ductile iron pipework provided by FLI Water. FT Ductile are the pipework vendor and they received an order from FLI Water to provide the pipe components. The external coating was added by FT Ductile the vendor and delivered to site with the coating on. This coating was not approved for submersion.

There were no out of the ordinary supply chain issues or time pressures that mean the scheme was rushed through.

I think on this occasion the details slipped through the net with FLI Water and FT Ductile for these four pipe elements (2 x pipe inlets, 2 x pipe outlets).

The principle contractor on the project was MWH, the underground pipework was installed by Claret Civil Engineering and the above ground pipework was installed by FLI Water, this included the four sections of pipework in the tank that did not meet Reg 31 approval.

Appendix 19 in the 20-day report is an accurate diagram of the pipework installations.

All the pipework is checked for leakage tested with either a hydraulic pressure test or a static flood test. There is also flushing completed on the pipework (to AW requirements, to a certain output flow) samples are taken during this flushing and as part of this process the tank is filled and more samples taken.

Partially treated water was used to commission the pipework (water had gone through filters) . The works is run to waste until the plant is stable, the contact tank is also cleaned and disinfected before going into supply.

The Risk Scientist review the MIC forms and the sampling data and sign off the 'into supply'. The 'into supply' process includes MIC checks which are part of the process for handing over the site from contractor to AW Operations. It was handed over in good faith believing that all the pipework was correct.

The MIC forms are difficult to navigate but it is detailed for the product certificate checks.

I have been involved with feedback from AW on the learnings from this event. @one continue to work with AW and so we are continually checking that things are correct. For me I do not believe this was deliberate, it was a human error. My view is that it was an unfortunate human error.

Signature: [REDACTED]

Official - Sensitive – When Complete

(Criminal Procedure Rules, r16; Criminal Justice Act 1967, s9)

Statement of: [REDACTED]

Age of witness (if over 18 enter "over 18"):

Over 18

Occupation of witness:

Project Delivery Manager

This statement, consisting of [REDACTED] pages each signed by me, is true to the best of my knowledge and belief and I make it knowing that, if it is tendered in evidence, I shall be liable to prosecution if I have wilfully stated in it anything which I know to be false or do not believe to be true.

Signature: [REDACTED]

Dated:

13/05/2022

My name is [REDACTED] and I work for SWECO which is an One Alliance Partner of Anglian Water (ANH). In 2015 I was the Project Delivery Manager and I am still in this role. At the time I was responsible for delivery in the Water Infra Programme Area in the East of the ANH region. However, this particular project was in the West but due to resource issues I was allocated this scheme in this area. I am now also part of Water Recycling Infra and Water Infra. During the work at Pitsford in 2015 I was the Project Delivery Manager overseeing the delivery of the Hannington to Pitsford pipework scheme. This was a 7.5 km, 630mm pipeline from Hannington Reservoir to Pitsford WTW. At the time of the event my Client Project Manager was [REDACTED] who is an ANH employee. I have a line manager on the SWECO side also but for my day to day work at the time of the event I would report to the client manager [REDACTED]. My SWECO manager I believe at the time was [REDACTED].

I have completed qualifications in HNC civil engineering, all the POSWSH training and the relevant EUSR hygiene code card training. Through the POSWSH training I covered Reg 31 training and impact planning training. This training I believe from memory was classroom based. It would have been a number of days training at various locations across the ANH region.

Regulation 31 means making sure any materials that are going to be used during the course of the scheme are compliant with Reg31 and are not going to cause any issues to consumers when the potable water is in contact with any of the materials or fittings used in the delivery of that scheme.

The way the AW MIC form works is that the engineer (in this case [REDACTED]) is tasked with requesting an MIC form from the risk scientist. Each MIC form has a unique reference number and is logged on the ANH system. This is sent through to the engineer to complete and ascertain the relevant DWI/WRAS etc certification for each fitting that is going to come in contact with the water supply. The engineer checks the certification is still valid. The engineer will check all the Reg 31 approvals for the products to be used and log them on the MIC form together with the appropriate certification number. My role is to make sure the process is followed and the document is signed off by the risk scientist. I need this document to show the business that I have complied with the Regulations. There are multiple project milestones to work through to show project delivery. This includes; business case, verifying business need, initial outline solution, detailed design, Milestones are approved at Director level to verify the commercial aspects, outputs, programme etc. As part of the submission the @One Alliance had to show the delivery programmes, how the costs are built up etc and that the MIC form has been completed correctly and signed off. These documents are uploaded into the corporate system to show that these requirements have been satisfied. Provided all the details are in place and correct the business (ANH) will then confirm that construction can commence. I went through this process in 2015 and it involved a number of sign offs from different key stakeholders in ANH.

[REDACTED] was responsible for the design for the inlet solution (the bell mouth). He would have had the breakdown for all the fittings that were to be used and he would have checked the Reg 31 certification and liaised with the risk scientist.

[REDACTED] and I have been providing information since the event was recognised to ANH. I was made aware there were issues in December 2021 and I only understood the details of the event in March 2022. [REDACTED]

[REDACTED] (ANH Chief Engineer) contacted me to ask me to cast my mind back and provide any details I may have which both [REDACTED] and I gladly provided.

Signature: [REDACTED]

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Continuation Statement of: Statement of:

I have no knowledge of a [REDACTED] who is listed on Part A of the 2017 MIC form the DWI has been provided with. On my form dated 2015 it is [REDACTED] who is the responsible engineer. My form looks different to the form the Inspectorate is showing me. The dates do not align and does also not include a box for a URN to be inserted by the risk scientist suggesting this to be an old version of a previous MIC form?

I have a form which shows that Jindal Saw (Jindal Sigma), the suppliers, provided the four pieces of pipework pre-coated with a blue epoxy top coat. This is an external coating (3M Scotchkote Epoxy Coating on two pieces and Resicote on another 2 pieces, this was because the spigot/socket and riser pipes were fabricated to client specification at source as opposed to being a standard DI fitting with coat already applied). This was the flange spigot pipe, the 90 degree bend, the spacer pipe and the bell mouth. In the photos it is the spigot pipe and the spacer pipe which appear to have the issues from the picture shown.

I have shown the Inspectorate the MIC form copy that I hold. It is different to the MIC form that the Inspectorate have shown me. The sign off on my original 2015 form is by [REDACTED] (ANH), [REDACTED] (ANH) and [REDACTED] (SWECO). This MIC form that I hold had the correct products and everything that was installed for Tank B. Please note based on the drawings of the project the two pipes that have changed colour are coated in Scotchkote which were coated at source by Jindal Saw. The other parts were coated in Resicoat again at source by Jindal Saw. The form I have is Ref. 1984 this is dated 2015, this was for the original installation. I do not recall I was involved with the 2017 remedial work and I do not know why my name is on the MIC form the DWI has been sent. Stonbury installed the original pipework in the tank in 2015 as they had the confined spaces training and were able to install the scaffolding to work safely in that space. I would not hold records for the Instructions for Use being complied with but will forward on to the inspector after this meeting. This would normally be the engineer or the site manager installing. As far as I am aware there was no coating done on site and the completed picture (including the scaffolding and evidence of stainless steel bolts ie not painted over) (Figure 4 in the 20-Day report) shows a uniform blue colour as the parts arrived pre-coated from Jindal Saw.

I was not aware there was further remedial work, nore was I involved with the work in 2017. I do not know why my name is at the top of the MIC form that has ben sent to the DWI. I think this form is incorrect as the reference number is not included. The form doesn't look right to me. There is no registration number, it has not been provided by the risk scientist.

As part of the construction pack for the 2015 work [REDACTED] would have included the instructions for use form. [REDACTED] was the Stonbury contact on site at the 2015 works scheme.

The photos of the pipework in Figure 7 of the 20 day report was not how we left the pipework in 2015. The engineer had everything signed off. I did not enter the tank in 2015 as I was not confined space trained and I was reliant on photos from the staff who entered the tank to undertake the works. I saw the pipe as it is shown in Figure 4 of the 20 day report with a uniform blue colour.

Signature:

Page 2 of 2

Official - Sensitive – When Complete

(Criminal Procedure Rules, r16; Criminal Justice Act 1967, s9)

Statement of:

Age of witness (if over 18 enter "over 18"):

Over 18

Occupation of witness:

Civils Delivery Manager

This statement, consisting of pages each signed by me, is true to the best of my knowledge and belief and I make it knowing that, if it is tendered in evidence, I shall be liable to prosecution if I have wilfully stated in it anything which I know to be false or do not believe to be true.

Signature:

Dated:

08/08/2022

My name is [REDACTED] I am a Civils Delivery Manager working for Stonbury Ltd. based at Chawston House, Chawston Lane, Chawston, MK44 3BH. At the time of the Pitsford project I was a Project Manager. I did not receive any specific Regulation 31 training from At One or Anglian Water. I only had a site induction.

I picked the job up second hand from [REDACTED] he and his team had done some external and internal pipework. The pipework was all free issue from Anglian Water/ At One alliance. Everything was installed but blanked off. The external inlet pipework had not been installed very well, it stuck out of the embankment. If the pipe had been turned through 45 degrees it would have sat inside the embankment so that was corrected.

My main point of contact through 2016 and 2017 was [REDACTED]. Stonbury sent [REDACTED] the MIC form containing the materials and products being used the form was reference 2790 for 2017. Reference 1796 was the original MIC form reference from 2016.

The At One alliance purchased pipework and Stonbury's installed it in 2015. Stonburys had put in two bits of short double flange pipework where the exterior coating was not Regulation 31 approved for submersion. I raised this with [REDACTED] from Balfour Beatty (At One alliance partner) and told him that it was not approved. I could tell from the colour that the two short lengths of pipe did not have the correct coating to be approved. I told [REDACTED] that he would have to change the two pipes. When the pipes were installed lifting equipment was needed, this was no longer available and so the decision was made to apply akathane to the two double flanged pieces of pipework. The akathane was added to the MIC form and this went through the usual sign off process via At One and Anglian Water. I was told that the bend and the bellmouth had a WRAS approved coating, I was assured this by [REDACTED]

I sent an email to [REDACTED] stating that the pipework needed to be WRAS approved or Scotchcoat coated pipework for the second cell (tank A) so the issue was not repeated in the second tank. I told [REDACTED] that Stonbury's were having to coat the unapproved pipework in akathane.

This project was completed before Stonbury started using dataloggers. Heaters and dehumidifiers were not used as it was warm (September 2016).

Scotchcoat was definitely not used as I know the colour, it is more green than blue and all the pipes were blue when I saw them. Scotchcoat pipework is done on steel pipe, not ductile iron pipe. It was ductile iron pipe that was installed, just with a blue epoxy coating on.

I think someone has ordered in normal pipework, not with the resicoat or Scotchcoat. I saw it straight away that the pipework was the same as the underground pipework not designed for submersion. I escalated this

Signature:

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