Ministry of the Environment, Conservation and Parks

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Ontario

July 13, 2021

File: SI-ES-LA-540

Town of Lakeshore
419 Notre Dame St.
Belle River, ON N0R 1A0

Attention: Mr. Truper McBride, CAO

Re: Municipality of Lakeshore Drinking Water System – Tecumseh Distribution System; Inspection Report

Please find enclosed the Inspection Report for the inspection of the Lakeshore (Tecumseh) Distribution System (DWS# 260004982) on July 7, 2021.

The format of the enclosed report has been updated, and you will note that the non-compliance and/or non-conformance items are now detailed at the beginning of the report. All questions that were assessed are included in the Inspection Details Section.

In order to measure individual inspection results, the Ministry has established an inspection compliance risk framework based on the principles of the Inspection, Investigation & Enforcement (II&E) Secretariat and advice of internal/external risk experts. The Inspection Rating Report (IRR) provides the Ministry, the system owner and the local Public Health Units with a summarized quantitative measure of the drinking water system's annual inspection and regulated water quality testing performance. IRR ratings are published (for the previous inspection year) in the Ministry's Chief Drinking Water Inspectors' Annual Report.

Please note that due to a change in IT systems, the Inspection Rating Report (IRR) cannot be generated at the same time as the inspection report. The IRR will be sent separately and prior to any public release (typically within 1-2 month of the completion of the inspection).

If you have any questions or concerns regarding this report, please call me at (226) 280-1406.

Yours truly,

Emily Awad
Water Inspector, Provincial Officer #1823
Drinking Water and Environmental Compliance Division
Sarnia/Windsor District

Encl.

cc: Garry Punt, Team Leader – Water Management, Krystal Kalbol, Corporate Leader – Operations, Albert Dionne, Division Leader – Water Management, Town of Lakeshore;
Dr. Wajid Ahmed, Medical Officer of Health (A), Nicole Dupuis, Chief Executive Officer, Kristy McBeth, Director of Health Protection, Phil Wong, Manager, Health Inspection Department, Victoria Peczulis, Manager, Environmental Health, Windsor-Essex County Health Unit;
Marc Bechard, Supervisor, Ministry of the Environment, Conservation and Parks.

MUNICIPALITY OF LAKESHORE DRINKING WATER SYSTEM - TECUMSEH DS

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Inspection Report

System Number:	260004982
Inspection Start Date:	06/11/2021
Inspection End Date:	07/13/2021
Inspected By:	Emily Awad
Badge #:	1823

(signature)

NON-COMPLIANCE/NON-CONFORMANCE ITEMS

This should not be construed as a confirmation of full compliance with all potential applicable legal requirement and BMPs. These inspection findings are limited to the components and/or activities that were assessed, and the legislative framework(s) that were applied. It remains the responsibility of the owner to ensure compliance with all applicable legislative and regulatory requirements.

If you have any questions related to this inspection, please contact the undersigned Provincial Officer.

INSPECTION DETAILS

This section includes all questions that were assessed during the inspection.

Ministry Program: Regulated Activity: DRINKING WATER : DW Municipal Residential

Question ID	MRDW1001000	
Question	**Question Type**	**Legislative Requirement**
What was the scope of this inspection?	Information	Not Applicable
Observation		
The primary focus of this inspection is to confirm compliance with Ministry of the Environment, Conservation and Parks (MECP) legislation as well as evaluating conformance with ministry drinking water policies and guidelines during the inspection period. The ministry utilizes a comprehensive, multi-barrier approach in the inspection of water systems that focuses on the source, treatment, and distribution components as well as management practices. This drinking water system is subject to the legislative requirements of the Safe Drinking Water Act, 2002 (SDWA) and regulations made therein, including Ontario Regulation 170/03, "Drinking Water Systems" (O.Reg. 170/03). This inspection has been conducted pursuant to Section 81 of the SDWA. This inspection report does not suggest that all applicable legislation and regulations were evaluated. It remains the responsibility of the owner to ensure compliance with all applicable legislative and regulatory requirements. This review also includes an assessment of compliance/conformance in relation to the following: • Drinking Water Operator and Water Quality Analyst Certification Regulation (O. Reg. 128/04) • Drinking Water System Licence 031-101, Issue Number 4, May 21, 2021 • Drinking Water Works Permit 031-201, Issue Number 5, May 21, 2021 • Ontario Drinking Water Quality Standards (ODWQS; O. Reg. 169/03) based on water quality data generated since the previous inspection. A remote inspection was conducted on July 7, 2021 for the inspection period August 1, 2020 to June 30, 2021.The inspection included a review of the documentation provided and interview of staff.		

Question ID	MRDW1000000	
Question	**Question Type**	**Legislative Requirement**
Does this drinking water system provide primary disinfection?	Information	Not Applicable
Observation		
This Drinking Water System provides for only secondary disinfection and distribution of water.		

Primary disinfection is undertaken by another regulated Drinking Water System which provides treated water to this Drinking Water System.

Question ID	MRDW1034000		
Question		**Question Type**	**Legislative Requirement**
Is the secondary disinfectant residual measured as required for the small municipal residential distribution system?		Legislative	SDWA | O. Reg. 170/03 | 7-2 | (5), SDWA | O. Reg. 170/03 | 7-2 | (6)
Observation			
The secondary disinfectant residual was measured as required for the distribution system. Secondary disinfection is supplied entirely by the City of Windsor Drinking Water System via the Tecumseh Distribution System. No re-chlorination takes place after entering the Lakeshore (Tecumseh) Distribution System. Logs show that distribution system chlorine residuals were taken and measured seven times per week as required; taken on two different days, 48 hours apart, at four and then three stations. Free chlorine measurements ranged from 0.42 to 1.51 mg/L during the inspection period.			

Question ID	MRDW1062000		
Question		**Question Type**	**Legislative Requirement**
Do records or other record keeping mechanisms confirm that operational testing not performed by continuous monitoring equipment is being done by a certified operator, water quality analyst, or person who meets the requirements of O. Reg. 170/03 7-5?		Legislative	SDWA | O. Reg. 170/03 | 7-5
Observation			
Records or other record keeping mechanisms confirmed that operational testing not performed by continuous monitoring equipment was being done by a certified operator, water quality analyst, or person who suffices the requirements of O. Reg. 170/03 7-5. Free chlorine residual monitoring is conducted by Lakeshore Water Distribution/Treatment operators, all of whom are properly certified.			

Question ID	MRDW1060000		
Question		**Question Type**	**Legislative Requirement**
Do the operations and maintenance manuals meet the requirements of the DWWP and MDWL issued under Part V of the SDWA?		Legislative	SDWA | 31 | (1)
Observation			

The operations and maintenance manuals met the requirements of the Drinking Water Works Permit and Municipal Drinking Water Licence issued under Part V of the SDWA.

The master copy of the standard operating procedures (SOPs) is maintained at the Lakeshore DWS Belle River water plant. Selected procedures are maintained in the "Lakeshore Water Supply System - Operations & Maintenance/Contingency Plan Manual" binder maintained for the distribution group. There were no updates to the SOPs or Operations Manual during the inspection period.

Copies of the Municipal Drinking Water System Licence and Drinking Water Works Permit are kept in a separate binder available to operators.

Question ID	MRDW1071000	
Question	**Question Type**	**Legislative Requirement**
Has the owner provided security measures to protect components of the drinking water system?	BMP	Not Applicable

Observation

The owner had provided security measures to protect components of the drinking water system.

This is a standalone distribution system with no treatment, rechlorination, booster or storage facilities. All sampling stations and boundary meters are locked.

Question ID	MRDW1073000	
Question	**Question Type**	**Legislative Requirement**
Has the overall responsible operator been designated for all subsystems which comprise the drinking water system?	Legislative	SDWA | O. Reg. 128/04 | 23 | (1)

Observation

The overall responsible operator has been designated for each subsystem.

The overall responsible operator (ORO) for the distribution system holds Class 3 certification; exceeding the water distribution subsystem Class 1 certification of the Lakeshore (Tecumseh) Distribution System.

Question ID	MRDW1074000	
Question	**Question Type**	**Legislative Requirement**
Have operators in charge been designated for all subsystems for which comprise the drinking water system?	Legislative	SDWA | O. Reg. 128/04 | 25 | (1)

Observation

Operators-in-charge had been designated for all subsystems which comprised the drinking water system.

Operators-in-charge (OIC) for each shift are required to be identified in a designated field in the Daily Operational Log book.

Question ID	MRDW1075000		
Question		**Question Type**	**Legislative Requirement**
Do all operators possess the required certification?		Legislative	SDWA | O. Reg. 128/04 | 22
Observation			
All operators possessed the required certification.			

Question ID	MRDW1099000		
Question		**Question Type**	**Legislative Requirement**
Do records show that all water sample results taken during the inspection review period did not exceed the values of tables 1, 2 and 3 of the Ontario Drinking Water Quality Standards (O. Reg.. 169/03)?		Information	Not Applicable
Observation			
Records showed that all water sample results taken during the inspection review period did not exceed the values of tables 1, 2 and 3 of the Ontario Drinking Water Quality Standards (O.Reg. 169/03).			

Question ID	MRDW1096000		
Question		**Question Type**	**Legislative Requirement**
Do records confirm that chlorine residual tests are being conducted at the same time and at the same location that microbiological samples are obtained?		Legislative	SDWA | O. Reg. 170/03 | 6-3 | (1)
Observation			
Records confirmed that chlorine residual tests were being conducted at the same time and at the same location that microbiological samples were obtained.			

Question ID	MRDW1081000		
Question		**Question Type**	**Legislative Requirement**
Are all microbiological water quality monitoring requirements for distribution samples being met?		Legislative	SDWA | O. Reg. 170/03 | 10-2 | (1),SDWA | O. Reg. 170/03 | 10-2 | (2),SDWA | O. Reg. 170/03 | 10-2 | (3)

Observation
All microbiological water quality monitoring requirements for distribution samples were being met. For a Small Municipal Residential drinking water system, O. Regulation 170/03 requires the owner and operating authority to take a minimum of one sample every two weeks from the distribution system. All samples must be analysed for E. coli, total coliforms and heterotrophic plate count (HPC). The distribution system was sampled at a minimum of two locations every week, from four routine sample locations, resulting in 8 to 10 samples per month. Each of the samples taken was analysed for HPC.

Question ID	MRDW1086000		
Question		**Question Type**	**Legislative Requirement**
Are all haloacetic acid water quality monitoring requirements prescribed by legislation conducted within the required frequency and at the required location?		Legislative	SDWA | O. Reg. 170/03 | 13-6.1 | (1),SDWA | O. Reg. 170/03 | 13-6.1 | (2),SDWA | O. Reg. 170/03 | 13-6.1 | (3), SDWA | O. Reg. 170/03 | 13-6.1 | (4),SDWA | O. Reg. 170/03 | 13-6.1 | (5),SDWA | O. Reg. 170/03 | 13-6.1 | (6)
Observation			
All haloacetic acid water quality monitoring requirements prescribed by legislation are being conducted within the required frequency and at the required location. As required under Sch. 13-6.1 of O. Regulation 170/03, samples must be taken and analysed for haloacetic acids in every calendar quarter (60 to 120 days apart). The Running Annual Average (RAA) was 7.3 ug/L.			

Question ID	MRDW1087000		
Question		**Question Type**	**Legislative Requirement**
Have all trihalomethane water quality monitoring requirements prescribed by legislation been conducted within the required frequency and at the required location?		Legislative	SDWA | O. Reg. 170/03 | 13-6 | (1)
Observation			

All trihalomethane water quality monitoring requirements prescribed by legislation were conducted within the required frequency and at the required location.

As required under Sch. 13-6 of O. Regulation 170/03, samples must be taken and analysed for Trihalomethanes in every calendar quarter (60 to 120 days apart). The RAA was 20.2 ug/L.

Question ID	MRDW1100000	
Question	**Question Type**	**Legislative Requirement**
Did any reportable adverse/exceedance conditions occur during the inspection period?	Information	Not Applicable

Observation

There were no reportable adverse/exceedances during the inspection period.

Question ID	MRDW1113000	
Question	**Question Type**	**Legislative Requirement**
Have all changes to the system registration information been provided to the Ministry within ten (10) days of the change?	Legislative	SDWA | O. Reg. 170/03 | 10.1 | (3)

Observation

All changes to the system registration information were provided within ten (10) days of the change.

Minor updates have been identified and a profile update form has been submitted to the MECP.

Question ID	MRDW1059000	
Question	**Question Type**	**Legislative Requirement**
Do the operations and maintenance manuals contain plans, drawings and process descriptions sufficient for the safe and efficient operation of the system?	Legislative	SDWA | O. Reg. 128/04 | 28

Observation

The operations and maintenance manuals contained plans, drawings and process descriptions sufficient for the safe and efficient operation of the system.

Water distribution operators have access to maps produced on the owner's GIS system on their own tablet. The GIS maps identify locations of mains, hydrants and valves. Curb-stops are also entered each summer to complete the map set, although locating services and old archived maps are still needed for identifying older services. All as-built drawings are scanned into electronic files and hyperlinks to those files have been incorporated onto the GIS distribution maps. Hydrant and valve asset data are also hyperlinked.

Question ID	MRDW1061000

Question	Question Type	Legislative Requirement
Are logbooks properly maintained and contain the required information?	Legislative	SDWA | O. Reg. 128/04 | 27 | (1), SDWA | O. Reg. 128/04 | 27 | (2), SDWA | O. Reg. 128/04 | 27 | (3), SDWA | O. Reg. 128/04 | 27 | (4), SDWA | O. Reg. 128/04 | 27 | (5), SDWA | O. Reg. 128/04 | 27 | (6), SDWA | O. Reg. 128/04 | 27 | (7)

Observation

Logbooks were properly maintained and contained the required information.

Operators conducting compliance and operational testing record their activities in a Daily Operational Log, used as a shift log. Work orders, repair records and log sheets are used to document details of these activities.