

Small Drinking Water Systems DISCLOSURE GUIDE



Letter from the Medical Officer of Health

Dear Owner/Operator:

The Ontario Public Health Standards requires public disclosure of inspection results of restaurants, public pools and spas, daycare centers, as well as personal services settings such as tattoo parlours, hair salons and more.

As of January 1, 2019, these results will be posted on the Haldimand-Norfolk Health Unit's InspectOUR Community website at https://Inspectourcommunity.hnhss.ca.

In addition, all establishments in Ontario will be required to post notices related to results of inspections. After an inspection is completed, establishments will be required to post the certificate of inspection as requested by the public health inspector. The goal of the disclosure program is to improve transparency and ensure accountability.



This guide book was created to highlight the changes under the new legislation, provide additional information about the disclosure program and outline your responsibility as a business owner. Please review this guide book carefully.

The public health inspectors at the Haldimand-Norfolk Health Unit are available to answer any questions you may have. Our public health inspectors are available Monday to Friday between 8:30am – 4:30pm and can be reached at 519-426-6170 or 905-318-6623.

Thank you for your cooperation. We look forward to continue working with you to keep our community safe and healthy.

Sincerely,

Dr. Shanker Nesathurai, MD, MPH, FRCP(C)

Small Drinking Water Systems: DISCLOSURE GUIDE

Introduction2
What is a SDWS?3
Classification of a SDWS3
Role of the Public Health Inspector4
Risk Categorization & Inspection Frequency5
Directives6
Disclosure7
What is it?
Why is it being implemented?7
Disclosure: What Does it Mean for You?8
Regulation: Overarching Features9
Key Features9
Taking a Water Sample10
Sampling Requirements11
Adverse Events12
Training
Appendix A: Guide for Identifying SDWS:
Major Residential Developments, Campgrounds
and Trailer Parks14

Appendix B: Guide for Identifying SDWS:
Non-Residential SDWS15
Appendix C: Guide for Identifying SDWS: SDWS
Serving Non-Residential Food Premises16
Appendix D: Do Not Drink the Water
Signage
Appendix E: Copy of MOHLTC's Small Drinking
Water System Identification Form18
Appendix F: Copy of MOHLTCs Notice of
Adverse Test Results and Issue Resolution19
Appendix G: Copy of the MOHLTCs Laboratory
Services Notification Form20
Appendix H: Recommended Sampling
History21
References

Introduction

In 2008, the regulatory responsibility for Small Drinking Water Systems (SDWS) was transferred to the Ministry of Health and Long-Term Care (MOHLTC) and provincial public health units. The operation and maintenance of Small Drinking Water Systems (SDWS) is governed by the Ontario Regulation 319/08: Small Drinking Water Systems under the Health Protection and Promotion Act, RSO 1990.

As a SDWS owner or operator, it is your legal responsibility to ensure that your facility complies with all of the necessary legislation and operating standards to keep the drinking water safe.

New regulation under the Ontario Public Health Standards (OPHS) and protocols were revised in July of 2018 and disclosure of inspections conducted in each jurisdiction is now required.

This document has been created to provide owners and operators of SDWS with a general overview of the regulatory requirements. This document will also highlight the changes that are occurring as a result of the updated regulation.

It is important to note that this guide does not discuss all requirements in the regulation, and following this guide does not exempt owners or operators from any regulatory responsibilities. A copy of Ontario Regulation 319/08: Small Drinking Water Systems can be found on-line at www.e-laws. gov.on.ca.





What is a SDWS?

The MOHLTC has provided information found in A Guide for Identifying Small Drinking Water Systems (2014) to help facilitate the identification of a drinking water system. It is important to note that this guide from the MOHLTC is not to be used as a legal document and should be used in conjunction with the Ontario Regulation 319/08: Small Drinking Water Systems. Chart A (Appendix A) provides information about water systems that are connected to major residential developments, campgrounds and trailer parks. Chart B (Appendix B) identifies non-residential small drinking water systems. Lastly, chart C (Appendix C) helps identify small drinking water systems that serve (non-residential) food premises.

Classification of a SDWS¹

There are 5 classes of SDWS that are inspected by a public health inspector:

- Small non-municipal non-residential systems: Examples include churches, restaurants, motels, etc.;
- 2. Large non-municipal non-residential: An example would be a larger resort;
- 3. Small municipal non-residential: Examples include community halls, sports arena, etc.;
- 4. Large municipal non-residential: An example would be a large sports complex;
- Non-municipal seasonal residential: Examples include campground or trailer parks

¹Southwestern Public Health. (N.D). Small Drinking Water System (SDWS)

Role of the Public Health Inspector

A key role of the public health inspector (PHI) is to ensure owners and operators of SDWS are staying in compliance with the regulation. In doing so, the drinking water will be kept safe for consumption and the possibility of illness as a result of bacterial, chemical or any other contamination will be reduced or eliminated. PHIs fulfill this obligation by conducting site specific risk assessments routinely, issuing directives that outline requirements in addition to the regulation and by responding to adverse observations and sample results.

PHIs are available for consultation on compliance issues. To reach a PHI, please call the Haldimand-Norfolk Health Unit at 519-426-6170 or 905-318-6623.



Risk Categorization & Inspection Frequency

A risk categorization is site specific and takes into consideration factors such as water source type, treatment and disinfection equipment in place, sampling history, etc. The PHI uses a MOHLTC risk categorization tool, commonly known as an RCat tool, to capture all of the SDWS elements which then generates a risk rating. Examples of what the MOHLTC's RCat tool takes into consideration includes, but is not limited to the following:

- The structural integrity of the well. For example, how properly is the well is constructed?
- The location of the well. For example, does the land slope away from the well to prevent pooling?

Sampling history: the RCat tool takes into consideration previous water results.



Based on the risk rating, SDWS can be categorized into three different categories: low, moderate and high risk as shown in Table 1 below.

Table 1: Risk rating and	d corresponding re-assess	ment requirements.
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Risk Rating	Inspection Frequency	Sampling Frequency
Low	Once every 4 years	Low
Moderate	Once every 4 years	Moderate
High	Once every 2 years	High

PHIs complete a risk categorization for each SDWS every two or four years, based on the system's risk rating. Risk categorization will be completed more often if changes to the SDWS have been made, or if the quality of water has changed. If changes, or alterations are made to the SDWS the owner and/or operator are required to notify the health unit prior to distributing water. Concerns or complaints about the water quality by users can trigger an onsite visit or a re-assessment.

Directives

The Ontario Regulation 319/08: Small Drinking Water Systems requires a PHI to issue a directive, taking into consideration the findings of the site specific risk categorization. The requirements of the directive are site specific and are in addition to the requirements of the regulation.

Directives remain in force for the life of the SDWS, or until an updated or amended directive replaces the existing one.

Directives² can include, but are not limited to:

- Meeting a specific level of disinfection
- The frequency, method and location of sampling
- Requiring operational checks to be carried out routinely

- Requiring operators to meet specific training requirements
- Posting of signage*

*Note: Signage is typically posted when the premise using a SDWS is accessible to the public. For example, a church which operates using well water and does not conduct any food preparation but allows members of the public to use their washroom may be required to post a "do not drink the water" sign (Appendix D). Your PHI will provide you with the signage if it is required and included in your directive.



²Examples of other directives can be found in Section 7(6) of the Ontario Regulation 319/08: Small Drinking Water Systems

Disclosure

What is it?

The disclosure program is a new requirement from the MOHLTC for every board of health to ensure that the results of the inspections conducted in their jurisdiction are available to the public.

While this program is not new in the province of Ontario, it is new to Haldimand and Norfolk counties.

As of January 1, 2019, all inspections conducted by our PHIs will be posted on the Haldimand-Norfolk Health Unit's (HNHU) website.

Why is it being implemented?

The Haldimand-Norfolk Health Unit supports the MOHLTC's goal of improving transparency and reporting practices in our counties.

The disclosure program will allow anyone to access inspection information, which will allow them to make informed decisions that may affect their health.

For more information about the disclosure program, you may consult the Ontario Public Health Standards or visit our website at www.hnhss.ca



Disclosure: What Does It Mean for You

What information will be disclosed?

The health unit will publicly disclose a summary report on each inspection and drinking water advisories of small drinking water systems.

The following information will be disclosed to the public:

- 1. The risk category of the small drinking water system.
- Any critical infractions that were observed on site.
 - For example: Failure to follow the required sampling schedule.
- Any non-critical infractions that were observed on site.
 - For example: Failure to notify the health unit of a change in ownership.
- 4. Any amendments to the site specific directive(s).

Drinking water and boil water advisories will also be posted on the disclosure website for the duration of the advisory. The following information will be disclosed:

Where will the inspection results be disclosed?

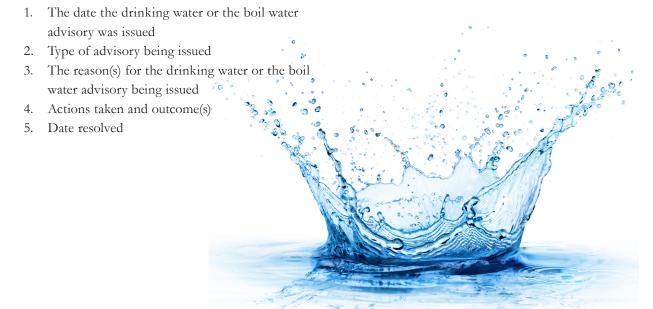
On our disclosure website **InspectOUR Community** at https://inspectourcommunity.hnhss.ca.

Who can see those results?

Anyone visiting the InspectOUR Community website will be able to access the information posted for inspections as of January 1, 2019. For inspections prior to this date, please contact the health unit at 519-426-6170 or 905-318-6623.

For how long will the inspection results be posted on the website?

As required by the MOHLTC, the results will be posted for a <u>minimum</u> of two years on our disclosure website, if the SDWS classified to be high risk. On the other hand, if the SDWS is classified as either moderate or low risk, the results will be posted for a <u>minimum</u> of 4 years on the disclosure website.



Regulation: Overarching Features

Small Drinking Water Systems are regulated by Ontario Regulation 319/08: Small Drinking Water Systems. Below is a summary of the overarching features of the Regulation.

Key Features

Notifications

SDWS owners or operators must provide the following information to the HNHU:

- their name and address
- notification of any changes in ownership, name or address
- the name of the laboratory that will conduct any tests (Refer to Appendix G for a copy of the MOHLTCs Laboratory Services Notification form)
- Reports of every adverse observation and every adverse test result

Owners and/or operators must also notify the HNHU, in writing in the following situations using the MOHLTC's Small Drinking Water System Identification form, which can be found in Appendix E or on our website.

- Before supplying water to users following the construction, installation, alteration or extension of a SDWS
- The first day the SDWS is no longer subject to the Ontario Regulation 170/03 (Drinking Water
- After 60 or more days where the system has not been supplying water to users

Directives

PHIs can provide owners and operators of SDWS with directives which must be followed

Use of Testing Facilities

Testing must be done from a person who is either licensed or authorized under the Safe Drinking Water Act, 2002

Treated Water

The owner and/or operator of a SDWS that treats the water needs to ensure that:

- The water treatment equipment is in operation whenever water is being supplied, operated in accordance with the manufacturer's instructions, and is operated in a manner that meets the equipment's capabilities
- If the equipment provides chlorination or chloramination for secondary disinfection:
 - the free chlorine residual is never less than 0.05mm/L, if the SDWS provides chlorination
 - the combined chlorine residual is never less than 0.25mm/L, if the SDWS system provides chloramination

Training

Owners must make sure that every operator of the SDWS is trained in drinking water system operation and maintenance and all relevant safety and emergency procedures

DID YOU KNOW?

Flaming the spout of your faucet, when collecting a water sample, can damage it. Use an isopropyl alcohol swab or a diluted bleach solution (1 part bleach: 9 parts water) to disinfect the end of your tap, instead. This ensures no debris or external pathogen influence your water results.

Taking a Water Sample

Water samples provide insight into the condition of your SDWS and can help your public health inspector identify an issue before it escalates.

The following steps are intended to help you take a more representative water sample:

- 1. Use the sample bottle provided by the HNHU. They can be picked up at any of our offices.
- 2. Wash your hands with soap and water.
- 3. Remove any aerators or attachments from the tap.
- 4. Swab the tap with an isopropyl alcohol wipe or use a bleach solution (1 part bleach and 9 parts water).
- 5. Let cold water run for 2-3 minutes before collecting it.
- 6. Remove the cap on the sample bottle.
- Store cap in such a way that the cap is not being contaminated (e.g. place cap on its back to prevent the cap from contaminating the lip of the bottle).
- 8. Fill the water up to the 'fill line'.
- 9. Secure the cap on the bottle tightly.
- 10. Fill out the submission form to be attached with your water sample.
- 11. Keep the water refrigerated and submit it within 24 hours.



DID YOU KNOW?

Sample bottles have a chemical known as sodium thiosulfate inside them.

This chemical neutralizes the chlorine residual in the water and ensures that the chlorine doesn't skew your results

Remember: Do not empty the bottle before filling it.

Sampling Requirements

Bacteriological

All owners and/or operators are required to test their water for e-coli and total coliform. These bacteria are an indication of contamination and therefore their presence in the water mean corrective actions need to be taken.

1. Sampling History

New SDWS and systems that have less than one year of sampling history need to establish a sampling history in order for the PHI to make a valid assessment of the system. Once established, the sampling history will be taken into consideration by the PHI and the RCat tool to determine the sampling frequency. The sampling frequency will be indicated in the directive issued by the PHI.

2. Distribution Systems

SDWS with more than one distribution system are assessed as per the table in Appendix H, due to the water supplying a greater number of people.

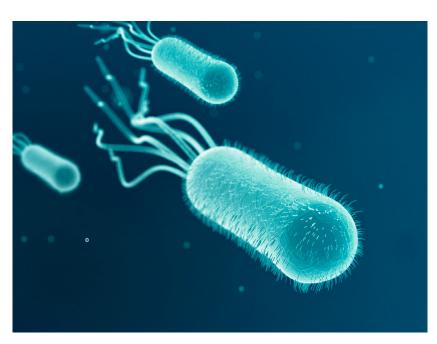
Chemical/Radiological

Water systems, suspected of a chemical and/or radiological contamination are assessed, tested and treated differently. If you suspect a chemical or radiological contamination to your SDWS, contact the HNHU at 519-426-6170 or 905-318-6623.

Note: Additional factors may play a role in determining the frequency of sampling for your SDWS. A PHI uses their expertise and knowledge to assess the risk in every situation in order to determine the best course of action.

DID YOU KNOW?

Private licensed laboratories upload your water sample results to a shared application where your PHI can review your results.



Adverse Events³

As an owner/operator of a SDWS, you have the legal responsibility of providing safe drinking water to your customers. However, things do not always go as planned. This is known as an adverse event.

Adverse events can be sub-categorized into adverse observation and adverse test results.

Adverse Test Results

Adverse test results are the test results from a drinking water system that does not comply with the regulation and therefore, is not safe for consumption.

The Ontario Regulation 169/03: Ontario Drinking Water Quality Standards, under the Safe Drinking Water Act, 2002 prescribes the requirement of safe drinking water. For example, Schedule 1 of the regulation dictates the standards set out by the Ministry of Health and Long-Term Care in regards to e-coli and total coliforms. Both of these bacteria need to be absent from your water supply in order for it to be deemed safe for consumption.

Schedule 2 of the regulation also lists the chemical standards acceptable in Ontario.

Refer to Appendix F for a copy of the MOHLTC's Notice of Adverse Test Results and Issue Resolution form.

Adverse Observation

An adverse observation is an observation made by the owner, operator or employee at the SDWS. This observation differs from the adverse test results in that it does not come from the water sample. Examples include:

- Turbid water: Indicative of improper filtration.
- Low disinfectant levels: Can lead to the build-up of a biofilm in the water.

Note: This is not an exhaustive list and observations may differ depending on the issues at hand.

DID YOU KNOW?

You are required to immediately report an adverse event to the HNHU. Your immediate notification can be done over the phone with a live person, but a written notice must follow within 24 hours.

³Information retrieved from the Ministry of Health and Long —Term Care's Response to Adverse Events Document (2009)

Training

While operator training is not mandatory in the Ontario regulation, your public health inspector may be of the opinion that you or your operators require training in order to efficiently manage and maintain a SDWS. The complexity of the SDWS may also determine whether training is necessary. Therefore, a requirement within the directive issued by your PHI can include training.

Alternatively, if you're of the opinion that a training course would be beneficial for you, as the operator of your SDWS and to do your due diligence, you can receive training from the Walkerton Clean Water Centre⁴. Courses are offered in several locations in Ontario.

Be sure to check out the target audience to make sure that the course is best suited to your needs.

Visit https://www.wcwc.ca/en/training/scheduled-courses/ to get more information.

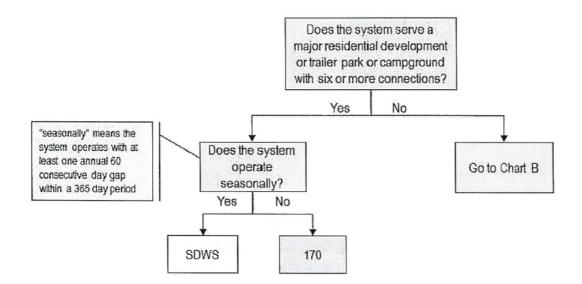


*While the Haldimand-Norfolk Health Unit does recommend training for owners and operators, it does not endorse any specific course or training centre. We are not affiliated with, nor are we compensated by the Walkerton Clean Water Centre.

Appendix A: Guide for Identifying SDWS: Major Residential Developments, Campgrounds and Trailer Parks

A Guide for Identifying Small Drinking Water Systems

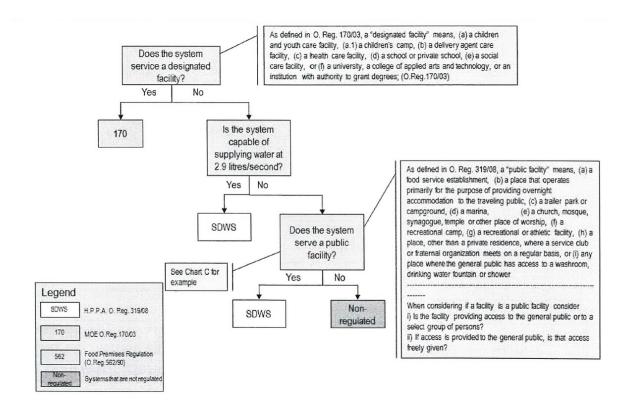
Chart A - Major Residential, Campgrounds and Trailer Parks



Appendix B: Guide for Identifying SDWS: Non-Residential SDWS

A Guide for Identifying Small Drinking Water Systems

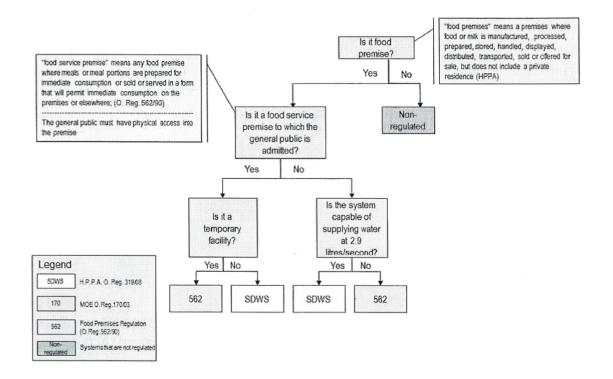
Chart B - Non-Residential Small Drinking Water Systems



Appendix C: Guide for Identifying SDWS: SDWS Serving Non-Residential Food Premises

A Guide for Identifying Small Drinking Water Systems

Chart C - Small Drinking Water Systems Serving Food Premises (Non-residential)



Appendix D: Do Not Drink the Water Signage



Appendix E: Copy of MOHLTC's Small Drinking Water System Identification Form

Note: The sample displayed below is not the complete form. Your PHI will be able to provide you a full copy of this form or you can access the form online at the MOHLTC <u>Central Form Repository</u>.

Ontario	Ministry of Health and Long-Term Care		king Water Sy Vater Systems Regi		
Health Protection and Promot health in the health unit where	n accordance with s. 13(1) of O. I tion Act, which requires that owne their small drinking water systen small drinking water system or fo	rs of small drinking wat n is located before supp	ter systems notify in working water to users of	riting, the medi of the system fo	cal officer of llowing
For a list of local Public Health	rd this form by fax or mail to yo n Units and contact information pl nglish/public/contact/phu/phuloc	ease visit the MOHLTO			
Mailing Address of Public	Health Office:	Fax Number of Pu	blic Health Office:		
		() -			
Check one of the following:					
☐ I have an existing s	mall drinking water system that hat the complete Sections 1, 2, 3 and		red with the Ontario G	overnment or	
☐ There has been alte	eration ⁽¹⁾ done to my small drinkin	g water system (comp	lete Sections 1, 2, 3,	4 and 6)	
☐ I have a newly cons	structed small drinking water syste	em (complete Section	s 1, 2, 3, 4 and 6)		
☐ I plan to reopen my	small drinking water system after	a shutdown of more th	nan 7 days <i>(complete</i>	Sections 3, 5	and 6)
 An extension of 2. A replacement 	s the following, in respect of a sma f the system. of part of the system. art of the system permanently out		m, but excludes repair	s to the system	1:
Section 1 – Owner Contact I	nformation				ALC: UNK
Name or Legal Entity		Name of Own	ner Contact (First Name,	Last Name)	
Address			Type (St/Blvd/	Direction	Suite/Apt.
Building Number	Street Name		Ave/Dr/Cr)	(N/S/W/E)	Number
			1	1	1

Appendix F: Copy of MOHLTCs Notice of Adverse **Test Results and Issue Resolution**

Note: The sample displayed below is not the complete form. Your PHI will be able to provide you a full copy of this form or you can access the form online at the MOHLTC Central Form Repository.



Appendix G: Copy of the MOHLTCs Laboratory Services Notification Form

Note: The sample displayed below is not the complete form. Your PHI will be able to provide you a full copy of this form or you can access the form online at the MOHLTC <u>Central Form Repository</u>.

Ont		Ministry of Health and Long-Term Care	Small Dr	atory Service	ms Regulation (O.Reg. 319/0	3) and
			Transitio	nal Small Drinking \	Water Systems	Regulation (O	.Reg. 318/08)
	Pleas	se complete this form	and forw	ard it to your local	l Public Health	Unit	
		tify the local Public Health					
	0	v.on.ca/english/public/con					
Once you have sub	omitted this fo	rd of Health <u>prior to</u> subm rm, it does not have to be I licensed laboratories car	re-submitte	ed unless you take yo	our samples to a d	censed laborato lifferent license	ory for testing. d laboratory for
		on/water/sdwa/licensedlab					
		em must have at least one d laboratories are applicat		boratory declared for	any required drin	king water test.	
Check all boxes to	hat apply:						
☐ Add lice	ensed laborato	ory or designated tests to p s can be added using a sin		plete sections 1, 2 an	d 5).		
Remove	e licensed labo	oratory or designated tests	s from profi	le (complete sections	1, 3 and 5).		
Up to tw	o laboratories	can be deleted using a si	ingle form.				
		stem Demographics					
Name of Drinking Wa	ter System				Drinking Water Sy	ystem Number	
Address					Type (St/Blvd/	Direction	Suite/apt.
Building number		Street name			Ave/Dr/Cr)	(N/S/W/E)	number
P.O. Box/Rural Route	1	City/Town			Province	Postal code	
Section 2 - Addin	g a Commerc	cial Licensed Laboratory					(2) (3)
		(Note: You may not specify		alth Laboratory)			
Address of Lab	oratory				Type (St/Blvd/	Direction	Suite/apt.
Building number		Street name			Ave/Dr/Cr)	(N/S/W/E)	number
P.O. Box/Rural F	Route	City/Town			Province	Postal code	
Name of Laborat	tory Contact (Fi	rst name, Last name)		Email			
				I			

Appendix H: Recommended Sampling History⁵

Table 3: Recommended sampling frequency for systems with distribution systems, by level of risk.

Applies to	Secondary	Number and Frequency of Sampling			
	Treatment	Low Risk	Moderate Risk	High Risk	
2-10 Connections*	Yes or no	One sample monthly	One sample monthly	One sample monthly	
11-100 Connections	Yes	One sample monthly	One sample monthly	One sample every two weeks	
≥ Connections	Yes	One sample from the treated water supply and one sample for every 100 connections or part thereof from the distribution system monthly	One sample from the treated water supply and one sample for every 100 connections or part thereof from the distribution system every two weeks	One sample from the treated water supply and one sample for every 100 connections or part thereof from the distribution system every week	

^{* &}quot;Number of connections" means the number of drinking water access points ither single or grouped.

[&]quot;Access points" means:

a. Single access point refers to a single standalone access point which may have one or more spouts, such as a drinking water fountain or tap or a trailer park site hook-up.

Grouped assess point refers to a system of plumbing within a single building.

References

Ontario Regulation 169/03: Ontario Drinking Water Quality Standards. Retrieved from https://www.ontario.ca/laws/regulation/030169

Ontario Regulation 319/08: Small Drinking Water Systems. Retrieved from https://www.ontario.ca/laws/regulation/080319

Ministry of Health and Long-Term Care (MOHLTC). (2014). A Guide For Identifying Small Drinking Water Systems.

Ministry of Health and Long-Term Care (MOHLTC). (2018). Small Drinking Water Systems Risk Assessment Guideline. From, http://www.health.gov.on.ca/en/pro/programs/publichealth/oph_standards/docs/protocols_guidelines/Small_Drinking_Water_Systems_Risk_Assessment_Guideline_2018_en.pdf

Southwestern Public Health. (N.D). Small Drinking Water System (SDWS). Accessed on January 23 2019, from https://www.swpublichealth.ca/your-environmental-health/drinking-water/small-drinking-water-systems-sdws

Note: This booklet is only intended to be a guide and does not replace any legislative requirements.

Inspect OURCommunity

For more information about the disclosure program and the InspectOur Community disclosure website, please contact the Haldimand-Norfolk Health Unit at 519-426-6170 or 905-318-6623 or visit https://inspectourcommunity.hnhss.ca

