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TO:	CHAIR AND MEMBERS CIVIC WORKS COMMITTEE MEETING OF FEBRUARY 3, 2015
FROM:	JOHN LUCAS, P.ENG. DIRECTOR - WATER AND WASTEWATER
SUBJECT:	MINISTRY OF THE ENVIRONMENT AND CLIMATE CHANGE INSPECTION REPORT FOR THE CITY OF LONDON WATER DISTRIBUTION SYSTEM - 2014

RECOMMENDATION

That on the recommendation of the Director - Water and Wastewater, the 2014 Ministry of the Environment and Climate Change Inspection Report for the City of London Water Distribution System **BE RECEIVED** for information.

PREVIOUS REPORTS PERTINENT TO THIS MATTER

[“Annual Ministry of Environment Inspection of the City Water Distribution System”, Civic Works Committee, September 10, 2012, Agenda item #3.](#)

[“Annual Ministry of Environment Inspection of the City of London Water Distribution System - 2012”, Civic Works Committee, February 4, 2013, Agenda item #2.](#)

[“Ministry of the Environment Inspection Report for the City of London Water Distribution System – 2014” Civic Works Committee, December 9, 2013, Agenda item #7.](#)

BACKGROUND

Municipal drinking water systems in Ontario are held to very high management and operational standards. The Ontario Ministry of the Environment and Climate Change (MOECC) ensures that these standards are being met through two separate mechanisms.

For water system management, the MOECC developed a Drinking Water Quality Management Standard (DWQMS) which combined elements of existing ISO 9001 and HACCP standards. Municipalities are required to implement and maintain Quality Management Systems (QMSs) that meet the requirements of this standard. QMSs can be defined as sets of interrelated elements (e.g. policies and procedures) that direct and control the way a facility operates with regard to quality. Conformance to the DWQMS is monitored through annual internal and external audits of the QMS.

Water system operations are governed by provincial regulations, and by the terms and conditions prescribed in MOECC-issued Drinking Water Works Permits and Municipal Drinking Water Licences. The MOECC performs rigorous annual inspections to ensure that municipalities are operating their water systems in compliance with all applicable legal requirements.

This report outlines the results of the 2014 MOECC Inspection, which was conducted in November, 2014.

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DISCUSSION

MOECC inspections can be in the form of comprehensive inspections, or focused inspections. The MOECC reported that London's Water Distribution System was chosen for a focused inspection because:

"...inspection findings over the past three years were such that the number of violations were minimal or non-existent, there were few or no orders issued to you that were of significance in the maintenance of water potability and there were no deficiencies as defined in O. Reg. 172/03."

The MOECC inspection included staff interviews and facility inspections, as well as a review of operating procedures, water analysis reports, operational records, and staff certification and training records. The inspection covered all components of London's water system, including the London portion of the Elgin-Middlesex Pumping Station, which is operated by the Ontario Clean Water Agency under contract to the City of London.

On December 10, 2014, the MOECC issued the City of London Water Distribution System Inspection Report. The report summarizes all of the inspection findings, and lists any incidents of non-compliance with regulatory requirements.

Only one incident of non-compliance was identified, which the MOECC reported as follows:

"All changes to the system registration information were not provided within ten (10) days of the change."

"At the time of the inspection, the contact information was reviewed in the Drinking Water Information System Profile and was found to be incorrect due to staffing changes."

The MOECC maintains "Drinking Water System Profile Information" for all water systems in Ontario, which includes contact information for key personnel within each system. London's Water Supply Supervisor is listed as an "alternate contact" in London's Drinking Water System Profile, and this is the position referred to in the non-compliance incident.

Prior to the inspection, London's Water Supply Supervisor had announced his intention to retire as of December 31, 2014. At the time of the inspection in November, the Supervisor was away from work using vacation allowance, and continued to do so until his retirement date. Two staff members were alternately sharing the responsibility of being the "acting" Supervisor during this time, and were attending to all e-mails and phone calls directed to the Supervisor.

The City of London had not replaced the Water Supply Supervisor at the time of the inspection, nor updated the Drinking Water System Profile Information, as the Supervisor had not yet retired; he was on vacation until his retirement date. Regardless, the MOECC Inspector identified this as an incident of non-compliance.

The former Water Supply Supervisor retired as of December 31, 2014. A new, fully qualified Supervisor has been appointed, and London's Drinking Water System Profile Information has been updated accordingly.

This incident of non-compliance does not reflect a drinking water quality hazard, but is indicative of the highly regulated nature of municipal drinking water systems in Ontario. It also serves to illustrate the level of diligence and scrutiny employed by MOECC Inspectors when reviewing water system operations.

The results of the annual MOECC Inspections are used to generate *Ministry of the Environment Drinking Water System Inspection Rating Records*. Each year, these rating records (or "report cards") for Ontario drinking water systems are compiled and made available to the public. Due to this single incident of non-compliance, the City of London received a Final Inspection Rating of 98.98% for 2014.

The following summarizes London's recent Final Inspection Ratings:

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- 2012 - 95.83%
- 2013 – 100.00%
- 2014 – 98.98%

The Inspection Summary Rating Record is attached as Appendix 'A'. The full Drinking Water System Inspection Report can be found at:

<http://www.london.ca/residents/Water/Water-System/Pages/Summary-and-Annual-Reports.aspx>

SUMMARY

The Ontario Ministry of the Environment and Climate Change (MOECC) performs rigorous annual inspections to ensure that municipalities are operating their water systems in compliance with all applicable legal requirements.

The MOECC recently completed the 2014 inspection of London's drinking water system, and outlined the findings in the City of London Water Distribution System Inspection Report.

The City of London received a Final Inspection Rating of 98.98% for the 2014 MOECC inspection, resulting from a single incident of administrative non-compliance. This did not reflect a drinking water quality hazard.

PREPARED BY:	RECOMMENDED BY:
JOHN SIMON, P.ENG. DIVISION MANAGER, WATER OPERATIONS	JOHN LUCAS, P.ENG. DIRECTOR - WATER AND WASTEWATER
REVIEWED & CONCURRED BY:	
JOHN BRAAM, P.ENG. MANAGING DIRECTOR OF ENVIRONMENTAL AND ENGINEERING SERVICES AND CITY ENGINEER	

CC:

Art Zuidema – City Manager
 Roland Welker – Division Manager – Water Engineering
 Dan Huggins - Water Quality Manager

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Appendix 'A'

Drinking Water Inspection Summary Rating Record

Ministry of the Environment - Inspection Summary Rating Record (Reporting Year - 2014-2015)

DWS Name: CITY OF LONDON DISTRIBUTION SYSTEM
DWS Number: 260004917
DWS Owner: London, City Of
Municipal Location: London
Regulation: O.REG 170/03
Category: Large Municipal Residential System
Type Of Inspection: Adhoc
Inspection Date: November 13, 2014
Ministry Office: London District

Maximum Question Rating: 393

Inspection Module	Non-Compliance Rating
Treatment Processes	0 / 64
Distribution System	0 / 21
Operations Manuals	0 / 28
Logbooks	0 / 14
Certification and Training	0 / 28
Water Quality Monitoring	0 / 63
Reporting & Corrective Actions	4 / 84
Treatment Process Monitoring	0 / 91
TOTAL	4 / 393

Inspection Risk Rating	1.02%
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FINAL INSPECTION RATING:	98.98%
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