

Ministry of the Environment,
Conservation and Parks

Ministère de l'Environnement, de la
Protection de la nature et des Parcs

Southwestern Region

Direction régionale du Sud-Ouest

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February 13, 2024

Brad Dupuis, Manager Water Services, O.R.O.
The Corporation of the Town of Tecumseh
1189 Lacasse Blvd.
Tecumseh ON N8N 2C7

Dear Mr. Dupuis,

Re: Tecumseh Distribution System, DWS No. 260004969
2023-2024 Inspection Report

Enclosed is the inspection report for the 2023-2024 inspection of the Tecumseh Distribution System and the corresponding Inspection Rating Report (IRR) and Risk Methodology document.

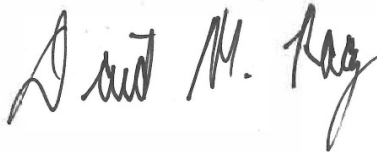
Section 19 of the Safe Drinking Water Act (Standard of Care) creates a number of obligations for individuals who exercise decision-making authority over municipal drinking water systems. Please be aware that the Ministry has encouraged such individuals, particularly municipal councillors, to take steps to be better informed about the drinking water systems over which they have decision-making authority. These steps could include asking for a copy of this inspection report and a review of its findings. Further information about Section 19 can be found in "Taking Care of Your Drinking Water: A Guide for Members of Municipal Councils" on the Drinking Water Ontario website at <https://www.ontario.ca/environment-and-energy/taking-care-your-drinking-water-guide-members-municipal-councils>.

The IRR is a summarized quantitative measure of the drinking water system's annual inspection and is published in the Ministry's Chief Drinking Water Inspector's Annual Report. The Risk Methodology document describes the risk rating methodology which has been applied to the findings of the Ministry's municipal residential drinking water system inspection results.

If you have any questions or concerns regarding the rating, please contact Marc Bechard, Water Compliance Supervisor, at 519-490-0761.

If you have any questions or concerns regarding this report, please call me at 519-980-2546.

Sincerely,

A handwritten signature in black ink that reads "David M. Racz". The signature is written in a cursive style with a large initial 'D' and 'R'.

David Racz
Water Compliance Officer
Windsor Area Office
Ministry of the Environment, Conservation and Parks

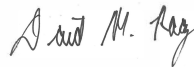
Cc: Dr. Mehdi Aloosh, WECHU Medical Officer of Health, maloosh@wechu.org
Kristy McBeth, Director of Health Protection, WECHU, kmcbeth@wechu.org
Victoria Peczulis, Manager, Environmental Health, WECHU, vpeczulis@wechu.org
Elaine Bennett, Manager, Environmental Health, WECHU, ebennett@wechu.org
Katie Stammler, Source Water Protection Manager, ERCA, kstammler@erca.org
Marc Bechard, Water Compliance Supervisor, MECP Sarnia District,
marc.bechard@ontario.ca



TECUMSEH DISTRIBUTION SYSTEM

INSPECTION REPORT

Entity: THE CORPORATION OF THE
TOWN OF TECUMSEH
Inspection Start Date: January 05, 2024
Inspection End Date: February 12, 2024
Inspected By: David Racz
Badge #: 1459
Inspected By: Marc Bechard
Badge #: 918



(signature)

NON-COMPLIANCE

The following item(s) have been identified as non-compliance, based on a "No" response captured for a legislative question(s). For additional information on each question see the Inspection Details section of the report.

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

Item	Question	Compliance Response/Corrective Action(s)
NC-1	Question ID: DWMR1114000 Does the owner have evidence that, when required, all legal owners associated with the DWS were notified of the requirements of the Licence & Permit?	The owner did not have evidence that required notifications to all legal owners associated with the Drinking Water System had been made during the inspection period.

RECOMMENDATIONS

This should not be construed as a confirmation of full conformance with all potential applicable 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 signed Provincial Officer.

INSPECTION DETAILS

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

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

Question ID	DWMR1001000	Question Type	Information
Legislative Requirement(s): Not Applicable			
Question: What was the scope of this inspection?			
Compliance Response(s)/Corrective Action(s)/Observation(s): <p>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.</p> <p>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.</p> <p>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.</p> <p>The review period for this inspection was from January 1, 2023 to December 31, 2023.</p>			

Question ID	DWMR1000000	Question Type	Information
Legislative Requirement(s): Not Applicable			
Question: Does this drinking water system provide primary disinfection?			
Compliance Response(s)/Corrective Action(s)/Observation(s): <p>The Tecumseh Distribution System is a standalone distribution system that obtains all of its water from the City of Windsor Drinking Water System, which provides primary and secondary disinfection.</p>			

Question ID	DWMR1018000	Question Type	Legislative
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Legislative Requirement(s):

SDWA | 31 | (1);

Question:

Has the owner ensured that all equipment is installed in accordance with Schedule A and Schedule C of the Drinking Water Works Permit?

Compliance Response(s)/Corrective Action(s)/Observation(s):

The owner had ensured that all equipment was installed in accordance with Schedule A and Schedule C of the Drinking Water Works Permit.

The Tecumseh Distribution System receives treated water from the City of Windsor Drinking Water System through ten direct connections. Drinking Water Works Permit Number 040-201, Issue Number 4 describes the system as having twelve direct connections to the City of Windsor Drinking Water System. However, one interconnecting valve was never installed and one was moved due to construction and is not presently active but can be activated at any time.

The Drinking Water Works Permit should be updated to accurately reflect the system as it is.

Question ID	DWMR1020000	Question Type	Legislative
Legislative Requirement(s):			
SDWA 31 (1);			
Question:			
Is the owner/operating authority able to demonstrate that, when required during the inspection period, Form 1 documents were prepared in accordance with their Drinking Water Works Permit?			
Compliance Response(s)/Corrective Action(s)/Observation(s):			
The owner/operating authority was in compliance with the requirement to prepare Form 1 documents as required by their Drinking Water Works Permit during the inspection period.			

Question ID	DWMR1021000	Question Type	Legislative
Legislative Requirement(s):			
SDWA 31 (1);			
Question:			
Is the owner/operating authority able to demonstrate that, when required during the inspection period, Form 2 documents were prepared in accordance with their Drinking Water Works Permit?			
Compliance Response(s)/Corrective Action(s)/Observation(s):			
The owner/operating authority was in compliance with the requirement to prepare Form 2 documents as required by their Drinking Water Works Permit during the inspection period.			

Question ID	DWMMR1114000	Question Type	Legislative
Legislative Requirement(s): SDWA 31 (1);			
Question: Does the owner have evidence that, when required, all legal owners associated with the DWS were notified of the requirements of the Licence & Permit?			
Compliance Response(s)/Corrective Action(s)/Observation(s): The owner did not have evidence that required notifications to all legal owners associated with the Drinking Water System had been made during the inspection period. The Town of Tecumseh does not provide a copy of their Drinking Water Works Permit and the Municipal Drinking Water License to the legal owners of drinking water infrastructure that has not yet been transferred to the municipality. Brad Dupuis, Manager Water Services, O.R.O., Town of Tecumseh, stated, "The legal possession of the infrastructure by the Town is not established until one year after the completion of construction. However, immediate monitoring and maintenance of the newly installed infrastructure commence upon connection to the Town's infrastructure. This includes activities such as flushing to maintain residuals, conducting locates, winterizing hydrants, and more. It's important to note that the Town strictly prohibits any work or maintenance on water infrastructure, whether private or public, without the presence of a licensed Town operator." The Town is currently reviewing the non-compliance and plans to submit a formal corrective action report to the Ministry when it is completed.			

Question ID	DWMMR1025000	Question Type	Legislative
Legislative Requirement(s): SDWA 31 (1);			
Question: Were all parts of the drinking water system that came in contact with drinking water (added, modified, replaced or extended) disinfected in accordance with a procedure listed in Schedule B of the Drinking Water Works Permit?			
Compliance Response(s)/Corrective Action(s)/Observation(s): All parts of the drinking water system were disinfected in accordance with a procedure listed in Schedule B of the Drinking Water Works Permit.			

Question ID	DWMMR1033000	Question Type	Legislative
Legislative Requirement(s): SDWA O. Reg. 170/03 7-2 (3); SDWA O. Reg. 170/03 7-2 (4);			
Question: Is the secondary disinfectant residual measured as required for the large municipal residential			

distribution system?

Compliance Response(s)/Corrective Action(s)/Observation(s):

The secondary disinfectant residual was measured as required for the large municipal residential distribution system.

Question ID	DWMR1099000	Question Type	Information
Legislative Requirement(s): Not Applicable			
Question: 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)?			
Compliance Response(s)/Corrective Action(s)/Observation(s): 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	DWMR1081000	Question Type	Legislative
Legislative Requirement(s): SDWA O. Reg. 170/03 10-2 (1); SDWA O. Reg. 170/03 10-2 (2); SDWA O. Reg. 170/03 10-2 (3);			
Question: For LMR systems, are all microbiological water quality monitoring requirements for distribution samples being met?			
Compliance Response(s)/Corrective Action(s)/Observation(s): All microbiological water quality monitoring requirements prescribed by legislation for distribution samples in a large municipal residential system were being met.			

Question ID	DWMR1096000	Question Type	Legislative
Legislative Requirement(s): SDWA O. Reg. 170/03 6-3 (1);			
Question: Do records confirm that chlorine residual tests are being conducted at the same time and at the same location that microbiological samples are obtained?			
Compliance Response(s)/Corrective Action(s)/Observation(s): 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	DWMR1086000	Question Type	Legislative
Legislative Requirement(s): 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);			
Question: Are all haloacetic acid water quality monitoring requirements prescribed by legislation conducted within the required frequency and at the required location?			
Compliance Response(s)/Corrective Action(s)/Observation(s): All haloacetic acid water quality monitoring requirements prescribed by legislation were conducted within the required frequency and at the required location. The Running Annual Average for the inspection period was 16.2 µg/L.			

Question ID	DWMR1087000	Question Type	Legislative
Legislative Requirement(s): SDWA O. Reg. 170/03 13-6 (1); SDWA O. Reg. 170/03 13-6 (2); SDWA O. Reg. 170/03 13-6 (3); SDWA O. Reg. 170/03 13-6 (4); SDWA O. Reg. 170/03 13-6 (5); SDWA O. Reg. 170/03 13-6 (6);			
Question: Have all trihalomethane water quality monitoring requirements prescribed by legislation been conducted within the required frequency and at the required location?			
Compliance Response(s)/Corrective Action(s)/Observation(s): All trihalomethane water quality monitoring requirements prescribed by legislation were conducted within the required frequency and at the required location. The Running Annual Average for the inspection period was 25 µg/L.			

Question ID	DWMR1103000	Question Type	Legislative
Legislative Requirement(s): SDWA O. Reg. 170/03 15.1-10;			
Question: Have corrective actions as directed by the Medical Officer of Health been taken by the owner and operating authority to address exceedances of the lead standard in plumbing?			
Compliance Response(s)/Corrective Action(s)/Observation(s): Corrective actions as directed by the Medical Officer of Health had been taken by the owner and operating authority to address exceedances of the lead standard.			

Question ID	DWMR1104000	Question Type	Legislative
Legislative Requirement(s): SDWA O. Reg. 170/03 16-6 (1); SDWA O. Reg. 170/03 16-6 (2); SDWA O. Reg. 170/03 16-6 (3); SDWA O. Reg. 170/03 16-6 (3.1); SDWA O. Reg. 170/03 16-6 (3.2); SDWA O. Reg. 170/03 16-6 (4); SDWA O. Reg. 170/03 16-6 (5); SDWA O. Reg. 170/03 16-6 (6);			
Question: Were all required verbal notifications of adverse water quality incidents immediately provided as per O. Reg. 170/03 16-6?			
Compliance Response(s)/Corrective Action(s)/Observation(s): All required notifications of adverse water quality incidents were immediately provided as per O. Reg. 170/03 16-6.			

Question ID	DWMR1113000	Question Type	Legislative
Legislative Requirement(s): SDWA O. Reg. 170/03 10.1 (3);			
Question: Have all changes to the system registration information been provided to the Ministry within ten (10) days of the change?			
Compliance Response(s)/Corrective Action(s)/Observation(s): All changes to the system registration information were provided within ten (10) days of the change.			

Question ID	DWMR1059000	Question Type	Legislative
Legislative Requirement(s): SDWA O. Reg. 128/04 28;			
Question: Do the operations and maintenance manuals contain plans, drawings and process descriptions sufficient for the safe and efficient operation of the system?			
Compliance Response(s)/Corrective Action(s)/Observation(s): The operations and maintenance manuals contained plans, drawings and process descriptions sufficient for the safe and efficient operation of the system.			

Question ID	DWMR1060000	Question Type	Legislative
Legislative Requirement(s): SDWA 31 (1);			

Question:

Do the operations and maintenance manuals meet the requirements of the DWWP and MDWL issued under Part V of the SDWA?

Compliance Response(s)/Corrective Action(s)/Observation(s):

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.

Question ID	DWMMR1061000	Question Type	Legislative
Legislative Requirement(s):			
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);			
Question:			
Are logbooks properly maintained and contain the required information?			
Compliance Response(s)/Corrective Action(s)/Observation(s):			
Logbooks were properly maintained and contained the required information.			

Question ID	DWMMR1062000	Question Type	Legislative
Legislative Requirement(s):			
SDWA O. Reg. 170/03 7-5;			
Question:			
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?			
Compliance Response(s)/Corrective Action(s)/Observation(s):			
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.			

Question ID	DWMMR1073000	Question Type	Legislative
Legislative Requirement(s):			
SDWA O. Reg. 128/04 23 (1);			
Question:			
Has the overall responsible operator been designated for all subsystems which comprise the drinking water system?			
Compliance Response(s)/Corrective Action(s)/Observation(s):			
The overall responsible operator had been designated for each subsystem.			

Brad Dupuis, Manager of Water Services, is designated as the overall responsible operator.

Question ID	DWMR1074000	Question Type	Legislative
Legislative Requirement(s): SDWA O. Reg. 128/04 25 (1);			
Question: Have operators-in-charge been designated for all subsystems which comprise the drinking water system?			
Compliance Response(s)/Corrective Action(s)/Observation(s): Operators-in-charge had been designated for all subsystems which comprise the drinking water system.			
All Tecumseh Distribution System operators are designated as operators-in-charge.			

Question ID	DWMR1075000	Question Type	
Legislative Requirement(s): SDWA O. Reg. 128/04 22;			
Question: Do all operators possess the required certification?			
Compliance Response(s)/Corrective Action(s)/Observation(s): All operators possessed the required certification.			

Question ID	DWMR1076000	Question Type	Legislative
Legislative Requirement(s): SDWA O. Reg. 170/03 1-2 (2);			
Question: Do only certified operators make adjustments to the treatment equipment?			
Compliance Response(s)/Corrective Action(s)/Observation(s): Only certified operators made adjustments to the treatment equipment.			