

**Ministry of the
Environment,
Conservation and Parks**
Eastern Region
Kingston District Office
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**Ministère de l'Environnement,
de la Protection de la nature
et des Parcs**
Région de l'Est
Bureau du district de Kingston
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January 10, 2025

Sent by Email: chris.morrison@uclq.on.ca

Chris Morrison,
Housing Manager
The Corporation of the United Counties of Leeds and Grenville
25 Central Avenue West, Suite 200
Brockville, Ontario
K6V 4N6

RE: Inspection of The Miller Manor Drinking Water System | Planned Event No. 1-312856493

Attached to this letter is the report for the recent announced inspection completed at 3 Miller Drive, Mallorytown, on November 8, 2024, and the corresponding Incident Rating Report (IRR) and Risk Methodology document. This report provides an assessment of compliance and conformance based on observations and information available during the inspection review period only.

Instances of non-compliance and/or non-conformance were identified during the inspection. Please refer to the "NON-COMPLIANCE/NON-CONFORMANCE ITEMS" section within the report to determine the actions required and take any necessary steps by the date(s) prescribed to bring the system/facility into compliance/conformance.

Additional findings and applicable comments, where provided, will be found within the report.

The IRR is a summarized quantitative measure of the drinking water system's annual inspections 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/licensed laboratory inspection results.

If you have questions or concerns, please contact me by email at nathalie.bennett@ontario.ca or by telephone at (613) 583-6379



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Enclosure (1)
ec:

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c: File SI-LG-FY-MI-540 (2024-25)



MILLER MANOR APARTMENTS DRINKING WATER SYSTEM

Physical Address: 3 MILLER DR, , FRONT OF
YONGE, ON K0E 1R0

INSPECTION REPORT

System Number: 260006958
Entity: UNITED COUNTIES OF LEEDS
& GRENVILLE
Inspection Start Date: October 31, 2024
Site Inspection Date: November 08, 2024
Inspection End Date: December 06, 2024
Inspected By: Nathalie Bennett
Badge #: P1524



(signature)

INTRODUCTION

Purpose

This announced, detailed inspection was conducted to confirm compliance with Ministry of the Environment, Conservation and Parks' (MECP) legislation and conformance with ministry drinking water policies and guidelines.

Scope

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 and the operation of the system.

The inspection of the drinking water system included both the physical inspection of the component parts of the system listed in section 4 "Systems Components" of the report and the review of data and documents associated with the operation of the drinking water system during the review period.

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.

Facility Contacts and Dates

The drinking water system is owned by The Corporation of the United Counties of Leeds and Grenville (Owner/Operating Authority) with the essential services provided by the Ontario Clean Water Agency.

The system serves an estimated population of 19 and is categorized as a Small Municipal Residential System. Information reviewed for this inspection covered the time period of September 20, 2023 to November 8, 2024.

Water Compliance Officer Nathalie Bennett, accompanied by Supervisor Mahmod Mahmod and coworker Sarah Young, met with Selena Shane (Process and Compliance Technician), Kurtis Winkenweder (Operations Supervisor), Chris Marchand (Facilities Maintenance Supervisor and Rebecca Morrison (Custodian) on November 8, 2024 as part of the inspection process.

Systems/Components

All locations associated with primary disinfection were visited as part of this inspection. The following site was visited as part of the inspection of the drinking water system:

- 1) Water Treatment Room - 3 Miller Drive, Mallorytown, Ontario.

Permissions/Approvals

This drinking water system was subject to specific conditions contained within the following permissions and/or approvals (please note this list is not exhaustive) at the time of the inspection in addition to the requirements of the SDWA and its regulations:

1. Municipal Drinking Water Licence (MDWL), #300-102 Issue #5, dated October 22, 2021;
2. Drinking Water Works Permit (DWWP), #300-202 Issue #4, dated October 22, 2021.
3. Other documents maintained by the O/OA associated with regulatory requirements under the Safe Drinking Water Act.

Background and Compliance

The previous drinking water compliance inspection was conducted on September 25, 2023. It cited no non-compliance or best management practice issues.

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	<p>Question ID: DWMR1111001</p> <p>Did the summary report contain the required information and was it completed and distributed as required?</p>	<p>The summary report did not contain the required information, and/or was not completed and distributed as required by Schedule 22-2 of O. Reg. 170/03.</p> <p>The summary report was not given to members of municipal council by the March 31, 2024 deadline but was distributed on April 9, 2024 to the appropriate persons.</p>

RECOMMENDATIONS

The following item(s) have been identified as non-conformance, based on a "No" response captured for a best management practice (BMP) 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	Recommendation(s)
R-1	<p>Question ID: DWMR1072001</p> <p>Had the owner and/or operating authority undertaken efforts to promote water conservation and reduce water losses in the drinking water system?</p>	<p>The owner and/or operating authority did not undertake efforts to promote water conservation and/or reduce water losses in their system.</p> <p>Alternate water efficiency measures for consideration include: lawn watering restrictions, encouraging, installation/subsidizing the costs of water efficient fixtures, public education programs, encouraging the use of water efficiency measures at industrial commercial and institutional facilities, metering, and leak detection programs.</p>
R-2	<p>Question ID: DWMR1010001</p> <p>Were trends in source water quality monitored?</p>	<p>Trends in source water quality were not monitored.</p> <p>As part of a best management practice, drinking water system owners should routinely assess source water quality to ensure that any changes that may lead to treatment issues are addressed.</p>

INSPECTION DETAILS

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

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

Question ID	DWMR1007001	Question Type	Legislative
Legislative Requirement(s): SDWA O. Reg. 170/03 1-2 (1)1;			
Question: Was the owner maintaining the production well(s) in a manner sufficient to prevent entry into the well of surface water and other foreign materials?			
Compliance Response(s)/Corrective Action(s)/Observation(s): The owner was maintaining the production well(s) in a manner sufficient to prevent entry into the well of surface water and other foreign materials. At the time of the inspection, the well cap was secure and the casing was maintained to prevent the entry of surface water and other foreign materials. There were no items stored near the well or other visible sources of contamination that could impact the well. During the inspection, it was discussed that the Owner/Operating Authority (O/OA) would build up the mounding surrounding the well to maintain adequate surface drainage away from the well.			

Question ID	DWMR1009001	Question Type	Legislative
Legislative Requirement(s): SDWA 31 (1);			
Question: Were measures in place to protect the groundwater and/or GUDI source in accordance with the Municipal Drinking Water Licence and Drinking Water Works Permit?			
Compliance Response(s)/Corrective Action(s)/Observation(s): Measures were in place to protect the groundwater and/or GUDI source. Section 16.2.8 and 16.2.9, Schedule B, MDWL issue 5 require an inspection schedule with inspection and maintenance procedures for the entire well structure, including all above and below grade well components. The operating authority conducted monthly visual inspections of the above ground components during the inspection period to ensure foreign material did not enter the well. The O/OA has advised that below ground components are checked every ten years, the last below ground inspection of the well was conducted on May 21, 2019			

Question ID	DWMR1010001	Question Type	BMP
Legislative Requirement(s): Not Applicable			
Question: Were trends in source water quality monitored?			
Compliance Response(s)/Corrective Action(s)/Observation(s): Trends in source water quality were not monitored. As part of a best management practice, drinking water system owners should routinely assess source water quality to ensure that any changes that may lead to treatment issues are addressed. O/OA indicated that raw water turbidity tests are conducted monthly, however no mention of the monitoring and trending of the water characteristics was demonstrated.			

Question ID	DWMR1014001	Question Type	Legislative
Legislative Requirement(s): SDWA 31 (1);			
Question: Was flow monitoring performed as required by the Municipal Drinking Water Licence or Drinking Water Works Permit?			
Compliance Response(s)/Corrective Action(s)/Observation(s): Flow monitoring was performed as required. Schedule C, Condition 2.0 of the MDWL requires that the cumulative and average daily volume of treated water that flows from the treatment subsystem to the distribution system (treated water) and the cumulative and average daily volume of water that flows into the treatment system (raw water) be measured and recorded twice per month. There are two flow meters in the System; one located directly after the water enters the system from the well, and one located at the treated water outlet. Documents indicated that measurements were taken twice per month in accordance with the requirements of the MDWL.			

Question ID	DWMR1015001	Question Type	Legislative
Legislative Requirement(s): SDWA 31 (1);			
Question: Were flow measuring devices calibrated or verified in accordance with the requirements of the Municipal Drinking Water Licence?			

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

Flow measuring devices were calibrated or verified as required.

The manufacturers recommended interval to check and calibrate the Carlon Meter is 6 years for the 1" size. This was last completed in February 2022 when the meters were replaced with a factory calibrated meter.

The water meter will be replaced every 6 years to meet MDWL requirements, and is due to be replaced with a factory calibrated meter by February 2028.

Question ID	DWMR1016001	Question Type	Legislative
Legislative Requirement(s): SDWA 31 (1);			
Question: Was the owner in compliance with the conditions associated with maximum flow rate or the rated/operational capacity in the Municipal Drinking Water Licence?			
Compliance Response(s)/Corrective Action(s)/Observation(s): The owner was in compliance with the conditions associated with maximum flow rate and/or the rated/operational capacity conditions. Section 1.1, Schedule C, of the MDWL provides a rated capacity of 90 m ³ /day for the maximum daily volume of treated water that flows from the treatment subsystem to the distribution system. Records were reviewed for the inspection period that showed that the maximum average rated capacity was 4.46 m ³ /day in May 2024.			

Question ID	DWMR1018001	Question Type	Legislative
Legislative Requirement(s): SDWA 31 (1);			
Question: Did the owner ensure that equipment was 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 ensured that equipment was installed as required. Visual observations of the System during the physical site inspection were consistent with the equipment description in the DWWP.			

Question ID	DWMR1028001	Question Type	Legislative
Legislative Requirement(s): SDWA 31 (1);			

Question:

Were up-to-date plans for the drinking water system made available in such a manner that they could be readily viewed by all persons responsible for all or part of the operation of the drinking water system, in accordance with the Drinking Water Works Permit and Municipal Drinking Water Licence?

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

Plans for the drinking water system were kept up-to-date and made available as required.

Question ID	DWMMR1023001	Question Type	Legislative
Legislative Requirement(s): SDWA O. Reg. 170/03 1-2 (2);			
Question: Did records indicate that the treatment equipment was operated in a manner that achieved the design capabilities prescribed by O. Reg. 170/03, Drinking Water Works Permit and/or Municipal Drinking Water Licence at all times that water was being supplied to consumers?			
Compliance Response(s)/Corrective Action(s)/Observation(s): Records indicated that the treatment equipment was operated in a manner that achieved the design capabilities prescribed. The drinking water system is supplied by a secure groundwater source. Treatment at the drinking water system consists of a water softener using potassium chloride, two cartridge filter units (both duty) with 5 micron filters and two Hallett 500pn UV reactors (both duty) each rated to provide a minimum dosage of 40 mJ/cm ² . Each UV unit is equipped with a UV intensity sensor with audible and visual alarms, solenoid for shutoff, transmittance sensor, flow restrictor and an automatic cleaning system. A review of records indicate that the Solenoid valves were checked quarterly with the last check occurring on October 1, 2024. UV bulbs and cartridge filters are at a minimum replaced annually, or as required, and were last replaced October 2, 2024. The treatment equipment was checked every two weeks. There was one alarm during the inspection period that was responded to and corrected by a qualified person.			

Question ID	DWMMR1026001	Question Type	Legislative
Legislative Requirement(s): SDWA O. Reg. 170/03 1-6 (2);			
Question: If primary disinfection equipment did not use chlorination or chloramination, was the equipment equipped with alarms or shut-off mechanisms that satisfy the standards described in Schedule 1-6 of O. Reg. 170/03?			

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

Primary disinfection equipment was equipped with alarms or shutoff mechanisms that satisfied the standards.

Two Hallet 500 PN model UV units are used for primary disinfection at the drinking water system. Each unit is capable of full treatment for the drinking water system. Each unit is equipped with a UV sensor that monitors UV intensity and dose with visual and audible alarms. A solenoid shutoff is installed for each unit in case of UV equipment malfunction or power failure.

Question ID	DWMR1027001	Question Type	Legislative
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Legislative Requirement(s):

SDWA | 31 | (1);

Question:

Did the owner have evidence indicating that chemicals and materials that came in contact with water within the drinking water system met all applicable AWWA and ANSI standards in accordance with the Municipal Drinking Water Licence and Drinking Water Works Permit?

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

The owner had evidence indicating that chemicals and materials that came in contact with water within the drinking water system met the applicable standards.

Visual inspection confirmed all UV equipment components and filters were NSF certified.

Question ID	DWMR1031001	Question Type	BMP
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Legislative Requirement(s):

Not Applicable

Question:

Were operators aware of the operational criteria necessary to achieve primary disinfection within the drinking water system?

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

Operators were aware of the operational criteria necessary to achieve primary disinfection within the drinking water system.

Question ID	DWMR1039001	Question Type	Legislative
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Legislative Requirement(s):

SDWA | O. Reg. 170/03 | 1-6 | (3);

Question:

If primary disinfection equipment that does not use chlorination or chloramination was used, did the owner and operating authority ensure the equipment had a recording device that continuously recorded the performance of the disinfection equipment?

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

The owner and operating authority ensured that the primary disinfection equipment had a recording device that continuously recorded the performance of the disinfection equipment.

The UV equipment continuously monitors UV intensity and UV dose but it does not record these parameters. The operator records the flow rate, intensity and UV lamp status every two weeks when on-site in accordance with the requirement in section 1.6, Schedule C of the MDWL.

Question ID	DWMR1109001	Question Type	Legislative
Legislative Requirement(s): SDWA O. Reg. 170/03 1-6 (1); SDWA O. Reg. 170/03 1-6 (2);			
Question: If the system used equipment for primary disinfection other than chlorination or chloramination and the equipment malfunctioned, lost power, or ceased to provide the appropriate level of disinfection, causing an alarm or an automatic shut-off, did a certified operator respond as required and take appropriate actions?			
Compliance Response(s)/Corrective Action(s)/Observation(s): A certified operator responded as required and took appropriate actions. During the inspection period, there was one instance on May 27, 2024. the backup batteries were depleted after a lengthy storm and power outage triggering an alarm and shut-off. The incident was addressed by a qualified person (i.e. operator) and detailed in the logbook for the facility.			

Question ID	DWMR1042001	Question Type	Legislative
Legislative Requirement(s): SDWA 31 (1);			
Question: If UV disinfection was used, were duty sensors and reference UV sensors checked and calibrated as per the requirements of Schedule E of the Municipal Drinking Water Licence or at a frequency as otherwise recommended by the UV equipment manufacturer?			
Compliance Response(s)/Corrective Action(s)/Observation(s): All UV sensors were checked and calibrated as required. The O/A checks the UV units on a bi-weekly basis, which includes checking the sensors and checking the lamp-life hours on each unit. The solenoid is inspected quarterly, the UV sensor is calibrated annually, and the UV lamp is replaced annually.			

Question ID	DWMR1099001	Question Type	Information
Legislative Requirement(s): Not Applicable			

<p>Question: Do records show that water provided by the drinking water system met the Ontario Drinking Water Quality Standards?</p>
<p>Compliance Response(s)/Corrective Action(s)/Observation(s): Records showed that all water sample results met the Ontario Drinking Water Quality Standards.</p>

Question ID	DWMR1080001	Question Type	Legislative
Legislative Requirement(s): SDWA O. Reg. 170/03 11-3 (1); SDWA O. Reg. 170/03 11-3 (3);			
Question: Were raw water microbiological sampling requirements prescribed by Schedule 11-3 of O. Reg. 170/03 for small municipal residential systems met?			
Compliance Response(s)/Corrective Action(s)/Observation(s): Raw water microbiological sampling requirements were met. The DWS is required to test one (1) bacteriological sample from raw water every month for Escherichia coli (E. coli), and total coliform (Schedule 11-3). A review of records for the inspection period, showed that samples were collected monthly as required.			

Question ID	DWMR1088001	Question Type	Legislative
Legislative Requirement(s): SDWA O. Reg. 170/03 13-7;			
Question: Were nitrate/nitrite sampling requirements prescribed by Schedule 13-7 of O. Reg. 170/03 met?			
Compliance Response(s)/Corrective Action(s)/Observation(s): Nitrate/nitrite sampling requirements were met. During the inspection period, quarterly samples were taken and were analyzed for nitrate/nitrite analysis as required. Nitrate and nitrite results were below the O. Reg. 169/03 Ontario Drinking Water Quality Standard (ODWQS) of 10 mg/L for nitrate and 1.0 mg/L for nitrite.			

Question ID	DWMR1089001	Question Type	Legislative
Legislative Requirement(s): SDWA O. Reg. 170/03 13-8;			
Question: Were sodium sampling requirements prescribed by Schedule 13-8 of O. Reg. 170/03 met?			

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

Sodium sampling requirements were met.

There was no requirement for sodium testing during this inspection period as the last sample for sodium analysis was collected on September 8, 2021 providing a sodium result of 2mg/L, which is below the reportable limit of 20 mg/L. The next sodium sampling date has been scheduled for September 2026.

Question ID	DWMR1092001	Question Type	Legislative
Legislative Requirement(s): SDWA O. Reg. 170/03 6-2;			
Question: Were water samples taken at the prescribed location?			
Compliance Response(s)/Corrective Action(s)/Observation(s): Water samples were taken at the prescribed location.			

Question ID	DWMR1094001	Question Type	Legislative
Legislative Requirement(s): SDWA 31 (1);			
Question: Were water quality sampling requirements imposed by the Municipal Drinking Water Licence and Drinking Water Works Permit met?			
Compliance Response(s)/Corrective Action(s)/Observation(s): Water quality sampling requirements were met.			
<p>The Municipal Drinking Water Licence (MDWL), Schedule D: Conditions for Relief from Regulatory Requirements provides relief from monitoring under Schedule 11 and 13 of O. Reg. 170/03. In lieu of this relief, the MDWL Schedule D outlines the requirement to test one (1) bacteriological sample from plumbing every month for Escherichia Coli, Total Coliform and Heterotrophic Plate Count. (Schedule 11-2). Records indicate sampling occurred as required.</p> <p>The MDWL Schedule D also outlines the requirement to test treated water once every 60 months for Uranium in lieu of the regulatory relief of Schedules 23 (inorganic) and 24 (organic) parameters. Testing was not required during this inspection period. Last sample tested September 2021, next sample due September 2026.</p>			

Question ID	DWMR1097001	Question Type	Legislative
Legislative Requirement(s): SDWA O. Reg. 170/03 7-3 (1.1);			

<p>Question: If the drinking water system obtained water from a ground water source, was turbidity tested at least once every month from each well that supplied water to the system?</p>
<p>Compliance Response(s)/Corrective Action(s)/Observation(s): Turbidity was tested as required.</p>

Question ID	DWMR1110001	Question Type	Legislative
Legislative Requirement(s): SDWA O. Reg. 170/03 11 (6);			
Question: Was the annual report prepared by February 28th of the following year and did it contain the required information?			
Compliance Response(s)/Corrective Action(s)/Observation(s): The annual report requirements were met.			

Question ID	DWMR1111001	Question Type	Legislative
Legislative Requirement(s): SDWA O. Reg. 170/03 22-2 (1); SDWA O. Reg. 170/03 22-2 (2); SDWA O. Reg. 170/03 22-2 (3); SDWA O. Reg. 170/03 22-2 (4);			
Question: Did the summary report contain the required information and was it completed and distributed as required?			
Compliance Response(s)/Corrective Action(s)/Observation(s): The summary report did not contain the required information, and/or was not completed and distributed as required by Schedule 22-2 of O. Reg. 170/03. The summary report was not given to members of municipal council by the March 31, 2024 deadline but was distributed on April 9, 2024 to the appropriate persons.			

Question ID	DWMR1113001	Question Type	Legislative
Legislative Requirement(s): SDWA O. Reg. 170/03 10.1 (3);			
Question: Were changes to the system registration information provided to the ministry within ten (10) days of the change?			

Compliance Response(s)/Corrective Action(s)/Observation(s):
Changes to the system registration information were provided as required.

Question ID	DWMR1114001	Question Type	Legislative
Legislative Requirement(s): SDWA 31 (1);			
Question: Did the owner have evidence that, when required, all legal owners associated with the drinking water system were notified of the requirements of the Municipal Drinking Water Licence and Drinking Water Works Permit?			
Compliance Response(s)/Corrective Action(s)/Observation(s): The owner had evidence that the required notifications were made.			

Question ID	DWMR1098001	Question Type	Legislative
Legislative Requirement(s): SDWA O. Reg. 170/03 13 (1); SDWA O. Reg. 170/03 13 (2); SDWA O. Reg. 170/03 13 (3);			
Question: Were the required records kept for the periods prescribed by section 13 of O. Reg. 170/03?			
Compliance Response(s)/Corrective Action(s)/Observation(s): The required records were kept for the prescribed periods.			

Question ID	DWMR1058001	Question Type	Legislative
Legislative Requirement(s): SDWA O. Reg. 128/04 28;			
Question: Did operators and maintenance personnel have ready access to operations and maintenance manuals?			
Compliance Response(s)/Corrective Action(s)/Observation(s): Operators and maintenance personnel had ready access to operations and maintenance manuals. Operators have access to a physical and electronic copy of the Operations Manual for the drinking water system.			

Question ID	DWMR1059001	Question Type	Legislative
Legislative Requirement(s): SDWA O. Reg. 128/04 28;			
Question: Did 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	DWMR1060001	Question Type	Legislative
Legislative Requirement(s): SDWA 31 (1);			
Question: Did the operations and maintenance manual(s) meet the requirements of the Municipal Drinking Water Licence?			
Compliance Response(s)/Corrective Action(s)/Observation(s): The operations and maintenance manual(s) met the requirements of the Municipal Drinking Water Licence.			

Question ID	DWMR1064001	Question Type	Legislative
Legislative Requirement(s): SDWA O. Reg. 128/04 26 (2);			
Question: Did an operator-in-charge ensure that records were maintained of all adjustments to the processes within their responsibility?			
Compliance Response(s)/Corrective Action(s)/Observation(s): The operator-in-charge ensured that records were maintained of all adjustments to the processes within their responsibility.			

Question ID	DWMR1062001	Question Type	Legislative
Legislative Requirement(s): SDWA O. Reg. 170/03 7-5;			
Question: Did records or other record keeping mechanisms confirm that operational testing not			

performed by continuous monitoring equipment was done by a certified operator, water quality analyst, or person who met the requirements of Schedule 7-5 of O. Reg. 170/03?

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 done by a certified operator, water quality analyst, or person who met the requirements of Schedule 7-5 of O. Reg. 170/03.

Question ID	DWMMR1063001	Question Type	Legislative
Legislative Requirement(s): SDWA O. Reg. 170/03 6-10 (1);			
Question: For every required operational test and sample, was a record made of the date, time, location, results, and name of the person conducting the test?			
Compliance Response(s)/Corrective Action(s)/Observation(s): For every required operational test and sample, a record was made as required.			

Question ID	DWMMR1061001	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: Were logbooks properly maintained and did they contain the required information?			
Compliance Response(s)/Corrective Action(s)/Observation(s): Logbooks were properly maintained and contained the required information.			

Question ID	DWMMR1065001	Question Type	Legislative
Legislative Requirement(s): SDWA O. Reg. 128/04 27 (6);			
Question: Were logs and other record keeping mechanisms available for at least five (5) years?			
Compliance Response(s)/Corrective Action(s)/Observation(s): Logs or other record keeping mechanisms were available for at least five (5) years. Records were maintained on site for five (5) years. Electronic copies were also maintained			

off site.

Question ID	DWMR1068001	Question Type	BMP
Legislative Requirement(s): Not Applicable			
Question: If available, were standby power generators tested under normal load conditions?			
Compliance Response(s)/Corrective Action(s)/Observation(s): Standby power generators were tested under normal load conditions. The plug-in generator is started up monthly and tested on-load annually. Records were not made available to demonstrate these activities, but it is recommended to implement a Generator Testing Log for review at next inspection.			

Question ID	DWMR1071001	Question Type	BMP
Legislative Requirement(s): Not Applicable			
Question: Did the owner provide security measures to protect components of the drinking water system?			
Compliance Response(s)/Corrective Action(s)/Observation(s): The owner provided security measures to protect components of the drinking water system. Access to the main building requires a key fob, which is only provided to residents of the building, the Owner, and the O/A. The water treatment room can only be accessed through an interior door of the building. The door includes a mechanical lock that is locked at all times, and only the Owner and O/A have keys to unlock the door.			

Question ID	DWMR1072001	Question Type	BMP
Legislative Requirement(s): Not Applicable			
Question: Had the owner and/or operating authority undertaken efforts to promote water conservation and reduce water losses in the drinking water system?			
Compliance Response(s)/Corrective Action(s)/Observation(s): The owner and/or operating authority did not undertake efforts to promote water conservation and/or reduce water losses in their system. Alternate water efficiency measures for consideration include: lawn watering restrictions, encouraging, installation/subsidizing the costs of water efficient fixtures, public education programs, encouraging the use of water efficiency measures at industrial commercial and			

institutional facilities, metering, and leak detection programs.

The O/OA currently only inspects for leaks in the system and does not account for additional efficiency measures.

Question ID	DWMR1073001	Question Type	Legislative
Legislative Requirement(s): SDWA O. Reg. 128/04 23 (1);			
Question: Was an overall responsible operator designated for all subsystems which comprise the drinking water system?			
Compliance Response(s)/Corrective Action(s)/Observation(s): An overall responsible operator was designated for all subsystem. Mark Lauzon is the designated overall responsible operator for the drinking water system. He is appropriately certified.			

Question ID	DWMR1078001	Question Type	Legislative
Legislative Requirement(s): SDWA O. Reg. 128/04 23 (1); SDWA O. Reg. 128/04 23 (2); SDWA O. Reg. 128/04 23 (4); SDWA O. Reg. 128/04 23 (6); SDWA O. Reg. 128/04 23 (7);			
Question: When the overall responsible operator was unable to act, was a properly certified operator designated to act in their place?			
Compliance Response(s)/Corrective Action(s)/Observation(s): A properly certified operator was designated to act in place of the overall responsible operator. Mark Lauzon was always able to act. Denis Sullivan was the designate in the event that the ORO was unable to act.			

Question ID	DWMR1074001	Question Type	Legislative
Legislative Requirement(s): SDWA O. Reg. 128/04 25 (1);			
Question: Were operators-in-charge designated for all subsystems which comprise the drinking water system?			
Compliance Response(s)/Corrective Action(s)/Observation(s): Operators-in-charge were designated for all subsystems.			

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Question ID	DWMR1075001	Question Type	Legislative
Legislative Requirement(s): SDWA O. Reg. 128/04 22;			
Question: Were all operators certified as required?			
Compliance Response(s)/Corrective Action(s)/Observation(s): All operators were certified as required.			

Question ID	DWMR1076001	Question Type	Legislative
Legislative Requirement(s): SDWA O. Reg. 170/03 1-2 (2);			
Question: Were adjustments to the treatment equipment only made by certified operators?			
Compliance Response(s)/Corrective Action(s)/Observation(s): Adjustments to the treatment equipment were only made by certified operators.			



INSPECTION RISK RATING REPORT (IRR)

Ministry of the Environment, Conservation and Parks - Inspection Summary Rating Record (Reporting Year - 2024-25)

DWS Name:	MILLER MANOR APARTMENTS DRINKING WATER SYSTEM
DWS Number:	260006958
DWS Owner:	UNITED COUNTIES OF LEEDS & GRENVILLE
Municipal Location:	BROCKVILLE
Regulation:	O.REG. 170/03
DWS Category:	DW Municipal Residential
Type of Inspection:	Detailed
Compliance Assessment Start Date:	Oct-31-2024
Ministry Office:	Kingston District Office

Maximum Risk Rating: 336

Inspection Module	Non Compliance Risk (X out of Y)
Capacity Assessment	0/38
Certification and Training	0/49
Logbooks	0/30
Operations Manuals	0/42
Reporting & Corrective Actions	4/37
Source	0/14
Treatment Processes	0/86
Water Quality Monitoring	0/40
Overall - Calculated	4/336

Inspection Risk Rating:	1.19%
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Final Inspection Rating:	98.81%
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Ministry of the Environment, Conservation and Parks - Detailed Inspection Rating Record (Reporting Year - 2024-25)

DWS Name: MILLER MANOR APARTMENTS DRINKING WATER SYSTEM
DWS Number: 260006958
DWS Owner Name: UNITED COUNTIES OF LEEDS & GRENVILLE
Municipal Location: BROCKVILLE

Regulation: O.REG. 170/03
DWS Category: DW Municipal Residential
Type of Inspection: Detailed
Compliance Assessment Start Date: Oct-31-2024
Ministry Office: Kingston District Office

Non-Compliance Question(s)	Non Compliance Risk
Reporting & Corrective Actions	
Did the summary report contain the required information and was it completed and distributed as required?	4
Overall - Total	4

Maximum Question Rating: 336

Inspection Risk Rating: 1.19%

FINAL INSPECTION RATING: 98.81%

APPLICATION OF THE RISK METHODOLOGY USED FOR MEASURING MUNICIPAL RESIDENTIAL DRINKING WATER SYSTEM INSPECTION RESULTS



The Ministry of the Environment (MOE) has a rigorous and comprehensive inspection program for municipal residential drinking water systems (MRDWS). Its objective is to determine the compliance of MRDWS with requirements under the Safe Drinking Water Act and associated regulations. It is the responsibility of the municipal residential drinking water system owner to ensure their drinking water systems are in compliance with all applicable legal requirements.

This document describes the risk rating methodology, which has been applied to the findings of the Ministry's MRDWS inspection

results since fiscal year 2008-09. The primary goals of this assessment are to encourage ongoing improvement of these systems and to establish a way to measure this progress.

MOE reviews the risk rating methodology every three years.

The Ministry's Municipal Residential Drinking Water Inspection Protocol contains 15 inspection modules consisting of approximately 100 regulatory questions. Those protocol questions are also linked to definitive guidance that ministry inspectors use when conducting MRDWS inspections.

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The questions address a wide range of regulatory issues, from administrative procedures to drinking water quality monitoring. The inspection protocol also contains a number of non-regulatory questions.

A team of drinking water specialists in the ministry assessed each of the inspection protocol regulatory questions to determine the risk (not complying with the regulation) to the delivery of safe drinking water. This assessment was based on established provincial risk assessment principles, with each question receiving a risk rating referred to as the Question Risk Rating. Based on the number of areas where a system is deemed to be non-compliant during the inspection, and the significance of these areas to administrative, environmental, and health consequences, a risk-based inspection rating is calculated by the ministry for each drinking water system.

It is important to be aware that an inspection rating less than 100 per cent does not mean the drinking water from the system is unsafe. It shows areas where a system’s operation can improve. The ministry works with owners and operators of systems to make sure they know what they need to do to achieve full compliance.

The inspection rating reflects the inspection results of the specific drinking water system for the reporting year. Since the methodology is applied consistently over a period of years, it serves as a comparative measure both provincially and in relation to the individual system. Both the drinking water system and the public are able to track the performance over time, which encourages continuous improvement and allows systems to identify specific areas requiring attention.

The ministry’s annual inspection program is an important aspect of our drinking water safety net. The ministry and its partners share a common commitment to excellence and we continue to work toward the goal of 100 per cent regulatory compliance.

Determining Potential to Compromise the Delivery of Safe Water

The risk management approach used for MRDWS is aligned with the Government of Ontario’s Risk Management Framework. Risk management is a systematic approach to identifying potential hazards, understanding the likelihood and consequences of the hazards, and taking steps to reduce their risk if necessary and as appropriate.

The Risk Management Framework provides a formula to be used in the determination of risk:

$$\text{RISK} = \text{LIKELIHOOD} \times \text{CONSEQUENCE}$$

(of the consequence)

Every regulatory question in the inspection protocol possesses a likelihood value (L) for an assigned consequence value (C) as described in **Table 1** and **Table 2**.

TABLE 1:	
Likelihood of Consequence Occurring	Likelihood Value
0% - 0.99% (Possible but Highly Unlikely)	L = 0
1 – 10% (Unlikely)	L = 1
11 – 49% (Possible)	L = 2
50 – 89% (Likely)	L = 3
90 – 100% (Almost Certain)	L = 4

TABLE 2:	
Consequence	Consequence Value
Medium Administrative Consequence	C = 1
Major Administrative Consequence	C = 2
Minor Environmental Consequence	C = 3
Minor Health Consequence	C = 4
Medium Environmental Consequence	C = 5
Major Environmental Consequence	C = 6
Medium Health Consequence	C = 7
Major Health Consequence	C = 8

The consequence values (0 through 8) are selected to align with other risk-based programs and projects currently under development or in use within the ministry as outlined in **Table 2**.

The Question Risk Rating for each regulatory inspection question is derived from an evaluation of every identified consequence and its corresponding likelihood of occurrence:

- All levels of consequence are evaluated for their potential to occur
- Greatest of all the combinations is selected.

The Question Risk Rating quantifies the risk of non-compliance of each question relative to the others. Questions with higher values are those with a potentially more significant impact on drinking water safety and a higher likelihood of occurrence. The highest possible value would be 32 (4×8) and the lowest would be 0 (0×1).

Table 3 presents a sample question showing the risk rating determination process.

TABLE 3:							
Does the Operator in Charge ensure that the equipment and processes are monitored, inspected and evaluated?							
Risk = Likelihood × Consequence							
C=1	C=2	C=3	C=4	C=5	C=6	C=7	C=8
Medium Administrative Consequence	Major Administrative Consequence	Minor Environmental Consequence	Minor Health Consequence	Medium Environmental Consequence	Major Environmental Consequence	Medium Health Consequence	Major Health Consequence
L=4 (Almost Certain)	L=1 (Unlikely)	L=2 (Possible)	L=3 (Likely)	L=3 (Likely)	L=1 (Unlikely)	L=3 (Likely)	L=2 (Possible)
R=4	R=2	R=6	R=12	R=15	R=6	R=21	R=16

Application of the Methodology to Inspection Results

Based on the results of a MRDWS inspection, an overall inspection risk rating is calculated. During an inspection, inspectors answer the questions related to regulatory compliance and input their “yes”, “no” or “not applicable” responses into the Ministry’s Laboratory and Waterworks Inspection System (LWIS) database. A “no” response indicates non-compliance. The maximum number of regulatory questions asked by an inspector varies by: system (i.e., distribution, stand-alone); type of inspection (i.e., focused, detailed); and source type (i.e., groundwater, surface water).

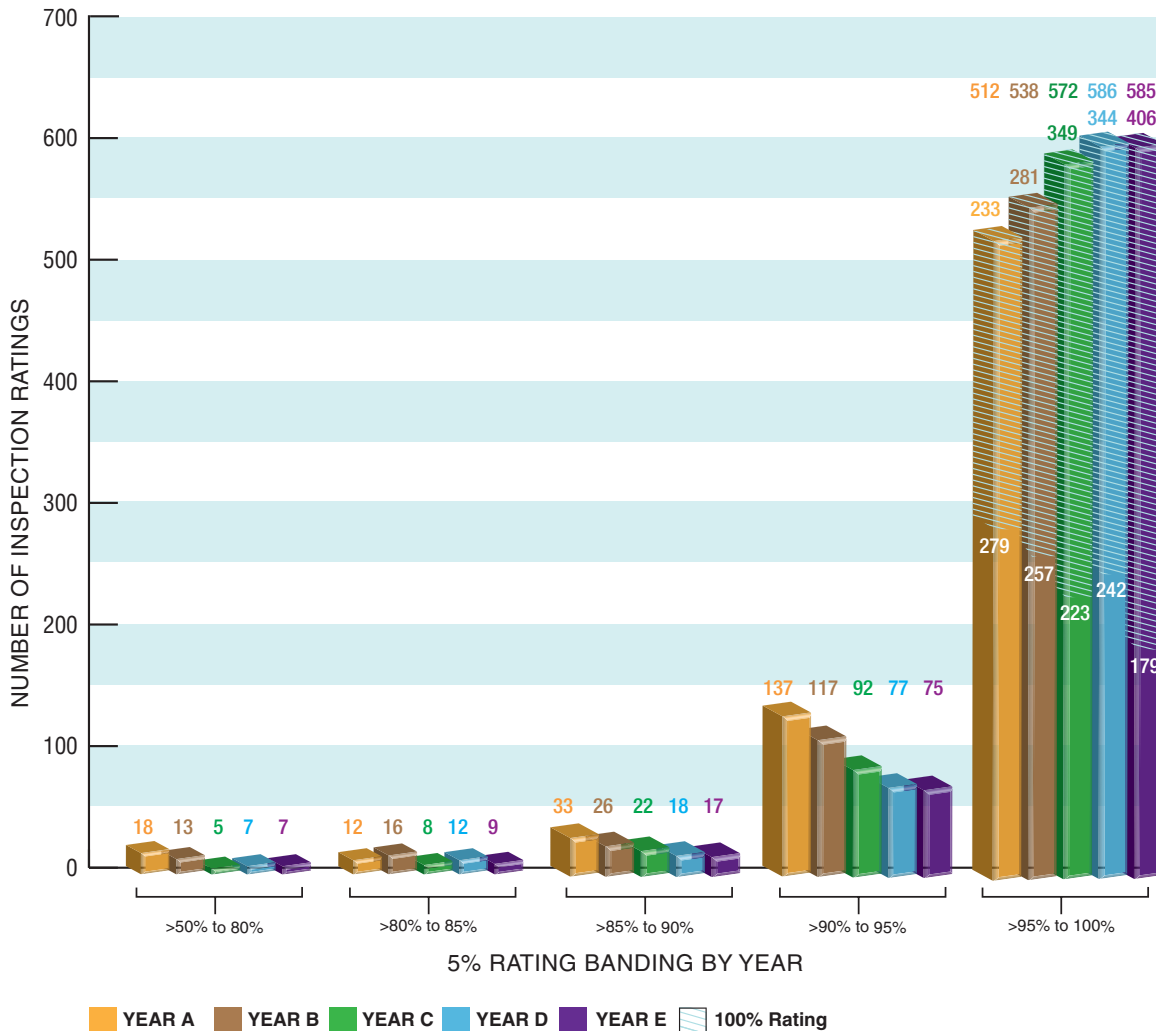
The risk ratings of all non-compliant answers are summed and divided by the sum of the risk ratings of all questions asked (maximum question rating). The resulting inspection risk rating (as a percentage) is subtracted from 100 per cent to arrive at the final inspection rating.

Application of the Methodology for Public Reporting

The individual MRDWS Total Inspection Ratings are published with the ministry's Chief Drinking Water Inspector's Annual Report.

Figure 1 presents the distribution of MRDWS ratings for a sample of annual inspections. Individual drinking water systems can compare against all the other inspected facilities over a period of inspection years.

Figure 1: Year Over Year Distribution of MRDWS Ratings



Reporting Results to MRDWS Owners/Operators

A summary of inspection findings for each system is generated in the form of an Inspection Rating Record (IRR). The findings are grouped into the 15 possible modules of the inspection protocol,

which would provide the system owner/operator with information on the areas where they need to improve. The 15 modules are:

- | | | | |
|-------------------------|---------------------------------|--|--|
| 1. Source | 5. Treatment Process Monitoring | 9. Logbooks | 13. Water Quality Monitoring |
| 2. Permit to Take Water | 6. Process Wastewater | 10. Contingency and Emergency Planning | 14. Reporting, Notification and Corrective Actions |
| 3. Capacity Assessment | 7. Distribution System | 11. Consumer Relations | 15. Other Inspection Findings |
| 4. Treatment Processes | 8. Operations Manuals | 12. Certification and Training | |

For further information, please visit www.ontario.ca/drinkingwater



STAKEHOLDER GUIDE

Key Reference and Guidance Material for Municipal Residential Drinking Water Systems

Many useful materials are available to help you operate your drinking water system. Below is a list of key materials owners and operators of municipal residential drinking water systems frequently use.

To access these materials online click on their titles below or use your web browser to search for their titles. Contact the Ministry if you need assistance or have questions at 1-866-793-2588 or waterforms@ontario.ca.

For more information on Ontario's drinking water visit www.ontario.ca/page/drinking-water



Click on the publication below to access it

- [Drinking Water System Profile Information Form - 012-2149E](#)
- [Laboratory Services Notification Form – 012-2148E](#)
- [Adverse Test Result Notification Form – 012-4444E](#)
- [Taking Care of Your Drinking Water: A Guide for Members of Municipal Councils](#)
- [Procedure for Disinfection of Drinking Water in Ontario](#)
- [Strategies for Minimizing the Disinfection Products Trihalomethanes and Haloacetic Acids](#)
- [Filtration Processes Technical Bulletin](#)
- [Ultraviolet Disinfection Technical Bulletin](#)
- [Guide for Applying for Drinking Water Works Permit Amendments, & License Amendments](#)
- [Certification Guide for Operators and Water Quality Analysts](#)
- [Training Requirements for Drinking Water Operator](#)
- [Community Sampling and Testing for Lead: Standard and Reduced Sampling and Eligibility for Exemption](#)
- [Drinking Water System Contact List – 7128E01](#)
- [Ontario's Drinking Water Quality Management Standard - Pocket Guide](#)
- [2020 Watermain Disinfection Procedure](#)
- [List of Licensed Laboratories](#)