

APPENDIX VI:

Proposed Issues Evaluation Methodology

Essex Region Source Protection Area

PROPOSED ISSUES EVALUATION METHODOLOGY

June 16, 2009

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Acknowledgement

The original version of this report was prepared by the Thames-Sydenham Source Protection Region (TSSPR). The Essex Region Source Protection Area is collaborating with the TSSPR on various technical studies related to Source Water Protection through common consulting firms, Stantec and Baird Associates. In order to keep consistency of approaches in dealing with technical issues, it is proposed to use the methodology of issue evaluation that was developed by the TSSPR.

We thank the Thames - Sydenham Source Protection Region for sharing and allowing us to use this methodology for our region.

1. INTRODUCTION

Under the Clean Water Act (2006) Technical Rules (December 2008), the assessment report must identify and describe drinking water quality issues. Identifying issues is a key step in the overall process of protecting drinking water quality. This is because an activity that may contribute to an identified issue is deemed a significant drinking water threat which must be mitigated through source protection plans, to no longer be a significant threat. In order to identify issues, the Essex Region Source Protection Area proposes an issues evaluation methodology with three main stages:

1. Screening,
2. Issue identification, and
3. Issue description.

The first two stages must be done to satisfy **Rule 114** (see **Appendix B**). The issues also have to be described according to **Rule 115**. The current document is intended to foster discussion on the proposed issues evaluation methodology. The methodology will be finalized upon consideration of comments from consultants and municipality staff working on technical studies in the Region, as well as conservation authority staff. The finalized methodology will serve as a guideline in the determination and description of drinking water quality issues in the Region for the Assessment Report.

Rule 114 defines a parameter or pathogen being an issue if it is present in concentrations that are shown to deteriorate raw water quality for use as a source of drinking water or there is a trend of increasing concentration which will cause a deterioration of raw water quality for use as a source of drinking water. Hence assessing for the deterioration of a raw water which is a drinking water source is an important step in defining issues, which can be accomplished by using a 'check' to determine whether a parameter is an issue or not. For treated drinking water, the 'check' is a drinking water standard. For the general health of a watershed and aquatic species in the water bodies, the 'check' is an aquatic life water quality objective. Raw water benchmarks for surface and groundwater drinking water sources are yet to be established. While background levels of water constituents may be reviewed, inadequate comprehensive long term (historical) data hinders the assessment of a background level of any contaminant in the raw water. It is important to consult with water treatment plant operating authorities, municipalities, consultants working on the technical studies, conservation authority staff and the Ministry of Environment (MOE) while setting up these 'checks' to identify issues in a raw water which is a drinking water source.

Rule 115 requires that an identified water quality issue be 'described', by listing the parameter or pathogen concerned, the intake or well where it has occurred, areas within vulnerable areas where the drinking water threats due to 'prescribed' (see Rule 118) or 'other' (see Rule 119) activities contribute to the issue, and lastly, listing activities, conditions (from past activities) and naturally occurring conditions associated with the issue.

Figure 1 shows the parameters and pathogens to be considered in the identification of drinking water quality issues under the Clean Water Act. Note that it does not include parameters not in Schedule 1, 2, 3 or Table 4.

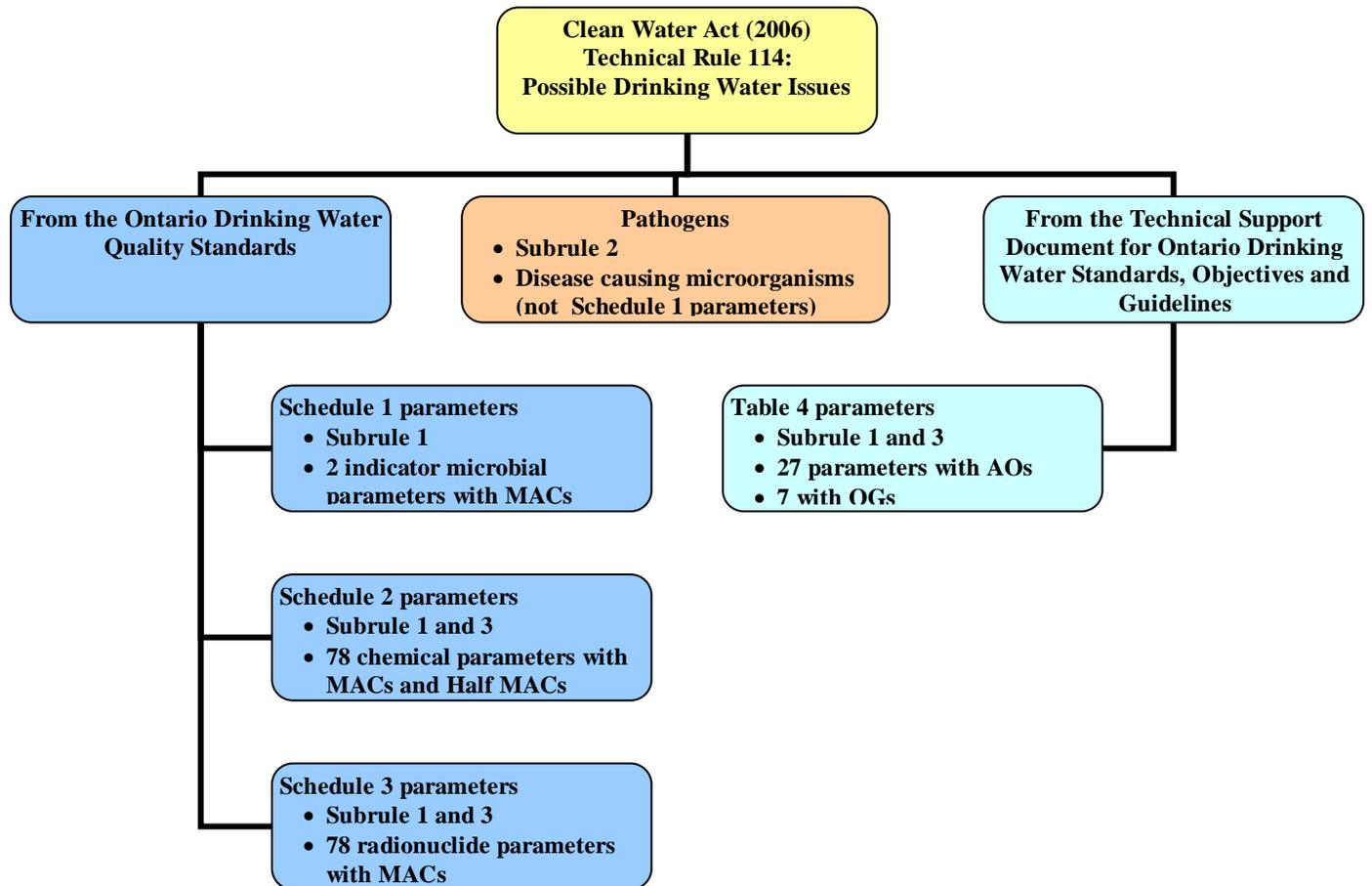


Figure 1: Clean Water Act Technical Rule 114: Possible Drinking Water Quality Issues

The Ontario Drinking Water Standards are human health based criteria established under the Regulation 169/03 under the Safe Drinking Water Act (2002) and are called Maximum Acceptable Concentrations (MACs). The Technical Support Document¹ provides criteria for Table 4 parameters to meet aesthetic objectives and plant operational guidelines. The criteria listed below are used to help flag and identify drinking water quality issues with the exception of the microbial parameters as explained in the relevant section.

Maximum Acceptable Concentrations (MACs) are the drinking water standards for chemical, radionuclide and microbial parameters which cannot be exceeded by treated drinking water.

Half MAC is that level at which a Schedule 2 (chemical) parameter requires increased sampling and testing under Regulation 170/03 - Section 13-5, Safe Drinking Water Act (2002).

Aesthetic Objectives (AO) are criteria for parameters listed in Table 4, for example taste, odour or colour, that may make the treated water unacceptable to customers even though there is not considered to be any appreciable health risk posed.

Operational Guidelines (OG) are criteria for parameters listed in Table 4 such as alkalinity and hardness that may negatively affect the efficient and effective treatment, disinfection and distribution of the water.

2. DATA USED IN THE ISSUES EVALUATION PROCESS

2.1. Data used for Screening

In the screening step, parameters or pathogens are ‘flagged’ based on certain concerns or previous water quality data review and reports which are described below.

2.1.1. Operating Authority Concerns

Conduct interviews with drinking water systems (DWS) operating authority to note specific concerns in the raw and treated water quality. The consultant/municipality should interview the operating authority (OA), document the outcomes of the interview and have the OA sign the document to confirm the document is an accurate representation of the OA’s opinions and concerns. Concerns may include parameters or pathogens that persist even after treatment, or which interfere in the treatment process, or parameters due to past activities that have resulted in increased monitoring at the well or intake.

2.1.2. The Essex Region Watershed Characterization Report (August 2006)

In the characterization report, the Provincial Water Quality Objectives (PWQOs) were used to assess the condition of Schedule 2, 3 and Table 4 parameters in raw water at the intakes (data from 1998 to 2002, 1 to 12 samples per year). At the time of preparation of the characterization report, the raw water microbial indicator data was not available. The raw water microbial data will be assessed to show ranges of bacteria counts, spikes and seasonal variation and this information must be used as per the issues screening methodology for Schedule 1 parameters. Where the data is not adequate for the purposes of screening to flag issues, other data may be utilised to flag parameters.

2.1.3. Annual Drinking Water System (DWS) Reports

The annual DWS reports flag parameters that persist in treated drinking water and where required, additional sampling and testing of raw water for specific parameters is also reported. Schedule 2 (chemical) parameters in treated water that exceed the half MAC are flagged for increased monitoring, under the Regulation 170/03 - Section 13-5, Safe Drinking Water Act (2002). Exceedances of the MAC for Schedule 1, 2 and 3 and some Table 4 parameters are provided in these reports. Summary of additional testing and sampling carried out in accordance with the requirement of a certificate of approval, order or other legal instrument are also provided in the annual reports (these may also be raw water samples).

A review of the reports must be done to flag parameters with exceedances of half MAC, MAC, and parameters that undergo extra testing by legal order.

2.1.4. Parameters not listed in Schedules 1, 2, 3 or Table 4

In other source protection regions, there have been suggestions to consider parameters not included in Rule 114 for issues identification. Further clarification from the Ministry of Environment is requested and required before considering parameters not listed in the schedules and table. Any such parameters should be brought to the attention of the SPC immediately.

2.2. Data used for Issues Identification

In the issues identification step, data to be used to determine if the screened (flagged) parameters are issues are:

2.2.1. Drinking Water Surveillance Program (DWSP)

DWSP is a voluntary program and not all drinking water systems participate in this. This dataset provides raw water Schedule 2, 3 and Table 4 parameter data. Data on the flagged parameters should be reviewed as per the relevant methodology outlined in this document to confirm issues.

2.2.2. Drinking Water Information System (DWIS)

This dataset provides Schedule 1 (indicator microbial) data and some chemical parameter data. Data on the flagged parameters should be reviewed as per the relevant methodology outlined in this document to confirm issues.

2.2.3. Other water treatment plant data for specific flagged parameters

Where limited data is available on flagged parameters or pathogens, laboratory analysis sheets (usually available from the water treatment plant) may be used to help decide on whether they are issues or not. Any other such reliable raw or treated water data (like grab sample data from MOE inspection reports) may be used to further substantiate that a flagged parameter is an issue.

3. ISSUES EVALUATION METHODOLOGY

Figure 2 is a flow chart of the proposed issues evaluation methodology. The data sets are described in the previous section. There are separate screening and issues identification methodologies for pathogens, the different types of parameters grouped as in Rule 114, and parameters not included in Rule 114.

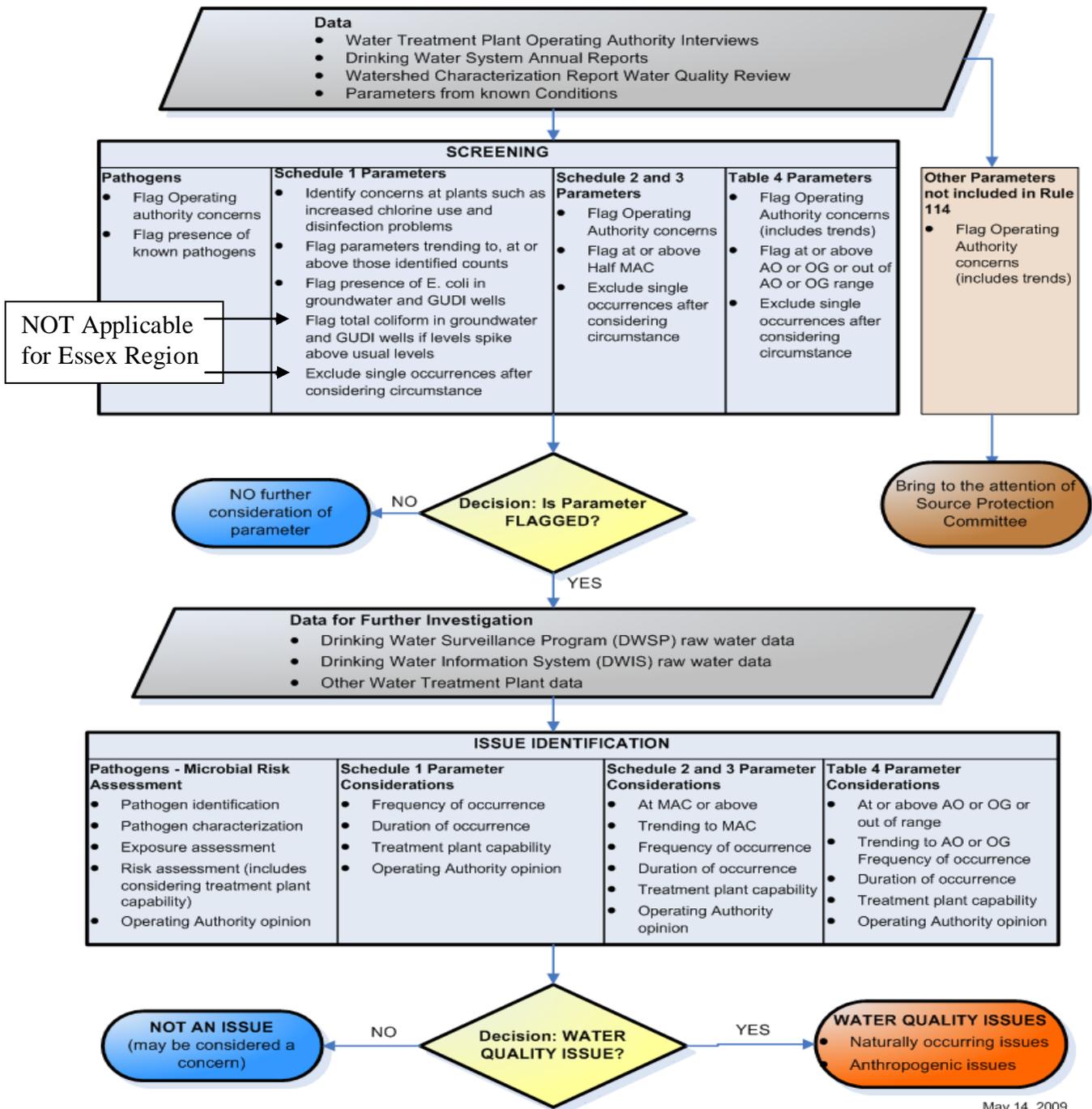


Figure 2: Proposed Issues Evaluation Methodology

3.1. Pathogens

3.1.1. Background

Pathogens are disease-causing bacteria, viruses or protozoa. They can cause severe or fatal waterborne illness in humans. Some are resistant to commonly used disinfectants at water treatment plants. It is understood that, under the Clean Water Act (2006), a microbial risk assessment must be done in order to confirm the identification of issues caused by pathogens. The main steps in such a risk assessment are pathogen identification and characterization, exposure assessment and risk characterizationⁱⁱ.

Any pathogens flagged through the pathogen screening process must be brought to the attention of the Essex Region Source Protection Committee. Direction from the MOE is anticipated in the near future on microbial risk assessment and until such direction is provided, it is suggested to complete the screening step only.

3.1.2. Presence in Raw Water

Pathogens may be found in raw surface water but not in groundwater, unless the groundwater is under the direct influence of surface water sources. Pathogens are not monitored routinely in raw water sources unless a known outbreak of waterborne illness caused by a pathogen or known fecal contamination has occurred. The indicators total coliform and *E. coli* are used to indicate possible fecal contamination and the consequent possible presence of pathogens.

The presence of the ‘current’ bacterial waterborne pathogens (e.g.: *Salmonella* and *Campylobacter*) may be associated with the presence of *E. coli*, a Schedule 1 parameter, but *E. coli* does not indicate the presence of the ‘emerging’ bacterial waterborne pathogens (e.g.: *Legionella* and *Helicobacter pylori*)ⁱⁱⁱ. Enteric viruses (such as noroviruses, hepatitis A and rotaviruses) and protozoa (such as *Giardia* and *Cryptosporidium*) cause human waterborne illnesses. The presence of *E. coli* is an indication that enteric viruses or protozoa could also be present; however, the absence of *E. coli* does not necessarily mean that they are also absent^{iv, v}.

3.1.3. Screening

- Operating Authority concerns must be flagged
- Known presence of a pathogen at a raw water source must be flagged
- Known presence of a pathogen in treated drinking water must be flagged
- Pathogen causing a past waterborne outbreak linked to the water supply must be flagged
- Single occurrences of pathogen in water samples due to faulty sampling or false laboratory results must be excluded from consideration.

3.1.4. Issues Identification

- Microbial risk assessment must be done to confirm that the flagged pathogen is an issue
- The main steps in a microbiological hazard risk assessment are hazard (pathogen) identification, hazard characterization, exposure assessment and risk characterization^{vi}
- Elements include pathological characteristics, infection mechanisms, resistance to control or treatment, survival, persistence, seasonality, reliability of treatment processes, route of

human exposure, exposed population characteristics, treatment, recontamination, infectivity, human dose response data, risk event and magnitude, evaluation of control measures.

- The microbial risk assessment takes into consideration the treatment plant disinfection capabilities, i.e. if a pathogen is adequately disinfected at the treatment plant, it may not be considered an issue.

3.2. Schedule 1 Parameters

3.2.1. Background

Total coliform and *Escherichia coli* (*E.coli*) are the Schedule 1 parameters. They are microbial indicators. Total coliform bacteria are widespread in nature being present in the soil and in the intestines and feces of animals including humans, livestock, poultry and wildlife. For drinking water, total coliform are still the standard test because their presence indicates contamination of a water supply by an outside source. *E. coli* is commonly used as an indicator of possible recent contamination of water by disease-causing bacteria, viruses or protozoa including those that are resistant to commonly used disinfectants. It is found exclusively in the faeces of humans and other warm-blooded animals. A specific strain of *E. coli*, *O157:H7* is pathogenic and is not specifically identified while routinely testing water for Schedule 1 parameters. If however the particular strain is identified, it is examined under the pathogen issues identification methodology. The commonly used unit to enumerate coliform bacteria is counts (of coliform) per 100 mL (of water sample).

3.2.2. Presence in Raw Water

Total coliform is commonly found in raw surface and groundwater sources, at a few orders of magnitude lower in groundwater due to natural geologic protection. *E. coli* is widely found in surface water sources and rarely present in groundwater. From the municipal raw water quality data review that was conducted recently; it was observed that *E.coli* was present in raw water at all the surface intakes in the region, ranging from zero to 2900 counts/100 mL.

3.2.3. Screening

In the updated watershed characterization reports, we intend to assess the weekly raw water microbial indicator data available for water treatment plants, to show ranges of bacteria counts and seasonal variation and this information as well as a review of all the data available must be used to flag potential issues as per the following criteria:

- Flag concerns and problems at plants due to high counts or trends of total coliform and *E. coli* in raw surface water that cause increased chlorine consumption or affect the disinfection capability. This is to be done in consultation with operating authority.
- Exclude single occurrences of total coliform or *E. coli* due to faulty sampling or false laboratory results.

3.2.4. Issues Identification

The following factors must be considered in determining whether the Schedule 1 parameter is an issue or not:

- Flagged Schedule 1 parameters must be examined for frequency and duration of occurrence, including continuous or repeated occurrence, trends, frequency of spikes that interfered in treatment processes (for example, a onetime spike over 5 years data may not be an issue)
- Consider treatment plant capabilities recognising the multibarrier approach in source water protection (i.e. a parameter might be an issue even if the plant can typically remove or reduce it to acceptable levels, or a parameter might not be an issue if it is adequately treated and there is no evidence of worsening levels)
- Consult operating authority for their opinion on the identified issue

3.3. Schedule 2 And 3 Parameters

3.3.1. Background

Schedule 2 parameters include organic and inorganic chemicals from industrial and agricultural activities as well as municipal waste and natural decomposition of organic matter. Inorganic chemicals include metals and nitrates. Organic chemicals include pesticides (e.g.: atrazine and DDT), polynuclear aromatic hydrocarbons (e.g.: benzo-a-pyrene, chlordane), chlorophenols (e.g.: 2,4-dichlorophenol), volatile organics (e.g.: benzene, vinyl chloride), dioxins and furans (e.g.: 2,3,7,8 TCDD). Schedule 3 parameters, radionuclides, occur naturally or are released during activities like mining or nuclear energy production. Upon ingestion, they may cause cancer or hereditary genetic changes in children^{vii}. Examples are radium-224, uranium-235 (both natural) and tritium (artificial).

3.3.2. Presence in Raw Water

From the municipal raw water quality data review conducted in the Essex Region watershed characterization report, certain Schedule 1 inorganic chemicals, Schedule 2 organic chemicals as well as Schedule 3 radionuclides were either detected (and at levels not posing a risk to human health), or were below detection levels.

3.3.3. Screening

- Flag operating authority concerns by conducting interviews with drinking water systems (DWS) operating authority to note specific parameters of concern to them in the raw and treated water, including qualitative concerns like nuisance plant growth (algae) at or near the intake (which may lead to flagging a nutrient parameter)
- A review of the annual drinking water system reports must be done to flag parameters with exceedances of half MAC as well as flag parameters that undergo extra testing by legal order
- Use the watershed characterization reports to flag schedule 2 and 3 parameters in raw and treated water at or above the Half MAC
- Make mention of those flagged that are naturally occurring or due to known past activities (conditions)
- A single instance of a parameter at or above Half MAC that is an isolated occurrence, faulty sampling or false laboratory result should be excluded from consideration as an issue

3.3.4. Issues Identification

- Identify, from flagged parameters, those trending to MAC levels and those at MAC levels
- Consider frequency of occurrence (a few times a year, seasonal, continuous presence, etc.) and further upward trending of identified parameters
- Consider treatment plant capabilities recognising the multibarrier approach in source water protection (i.e. a parameter might be an issue even if the plant can typically remove or reduce it to acceptable levels, or a parameter might not be an issue if it is adequately treated and there is no evidence of worsening levels)
- Identify parameters in spills that may have caused the water treatment plant to be shut down
- Obtain operating authority's opinion on identified issues

Note:

Maximum Acceptable Concentrations (MACs): Ontario drinking water standards for chemical, radionuclide and microbial parameters beyond which human health may be adversely affected.

Half MAC: The level at which a Schedule 2 (chemical) parameter in the treated water is flagged for increased sampling and testing requirements (under Regulation 170/03 - Section 13-5, Safe Drinking Water Act, 2002)

3.4. Table 4 Parameters

3.4.1. Background

The Table 4 parameters are physical and chemical parameters such as taste and turbidity that may affect the taste, odour or colour of water or interfere with good water quality control practices. Also included are parameters such as alkalinity and aluminum may negatively affect the efficient and effective treatment, disinfection and distribution of the water.

3.4.2. Presence in Raw Water

From the municipal raw water quality data review conducted in the Essex Region watershed characterization report, certain Table 4 parameters in the raw source water were found to be close to or above levels at which they could affect the aesthetic quality of water or the operation of the water treatment plant. Some of these are naturally occurring.

3.4.3. Screening

- Flag operating authority concerns by conducting interviews with drinking water systems (DWS) operating authority to note specific parameters of concern to them in the raw and treated water, trends of those parameters, and qualitative concerns like taste and odour
- Flag all Table 4 parameters in raw and treated water at or above the respective AO or OG
- A single instance of a parameter above AO or OG should be further checked for isolated occurrence, faulty sampling or false laboratory result
- Flag certain parameters differently
 - The AO of sodium is 200 mg/L, but the local Medical Officer of Health should be notified when sodium exceeds 20 mg/L to inform patients on sodium restricted diets. Flag sodium levels at or above 20 mg/L
 - The parameters 1,2-dichlorobenzene, 1,4-dichlorobenzene, 2,4-dichlorophenol, 2,3,4,6-tetrachlorophenol, 2,4,6-trichlorophenol, 2,4,5-trichlorophenoxy acetic acid, monochlorobenzene and pentachlorophenol have both AOs and MACs; these would

- be considered under the issues identification process for Schedule 2 parameters using the half MAC (half Ontario treated drinking water standard) and not under the AO
- Flag parameters pH, alkalinity and hardness at levels outside the OG range
 - Flag qualitative and contributing parameters
 - Flag qualitative parameters like taste and odour based on operating authority interview information. Flag parameters that contribute to the Table 4 parameters even if they are not included in Rule 114; for example increased phosphorus levels may have caused algal growth which in turn may cause taste and odour problems at the intake, so flag the parameters of taste and odour and the contributing parameter phosphorus
 - Flag turbidity at or above AO levels for further investigation. Turbidity can significantly interfere with disinfection, be a source of disease-causing organisms and shield pathogenic organisms from the disinfection process; it is also an indicator of treatment efficiency (particularly filters)^{viii}.
 - If trihalomethanes (THMs) are flagged (under the methodology for Schedule 2 parameters), then flag contributing raw water parameters of dissolved organic carbon (DOC) and turbidity, which are Table 4 parameters. Raw water DOC and the organic content in turbidity combine with chlorine disinfectants at the treatment plant to form trihalomethanes (THMs), a byproduct that deteriorates the quality of drinking water.

3.4.4. Issues Identification

- Further investigate flagged parameters for levels or trending to AO or OG levels and their interferences with proper treatment, for example, investigate flagged turbidity for interference with proper disinfection or filtration, or for contributing to flagged levels of THMs
- Consider parameters (including those not identified in Rule 114) contributing to flagged Table 4 parameters
- Consider frequency of occurrence (a few times a year, seasonal, continuous presence, etc.) and further upward trending of identified parameters
- Consider treatment plant capabilities recognising the multibarrier approach in source water protection (i.e. a parameter might be an issue even if the plant can typically remove or reduce it to acceptable levels, or a parameter might not be an issue if it is adequately treated and there is no evidence of worsening levels)
- Identify parameters in spills that may have caused the water treatment plant to be shut down
- Obtain operating authority opinion on list of issues

Note:

Aesthetic Objectives (AO): The level at which parameters such as taste and turbidity that may affect the taste, odour or colour of water or interfere with good water quality control practices.

Operational Guidelines (OG): The level at which parameters such as alkalinity and hardness that may negatively effect the efficient and effective treatment, disinfection and distribution of the water.

3.5. Other Parameters

In other source protection regions, there have been suggestions to consider parameters not included in Rule 114 for issues identification. Further clarification from the Ministry of Environment on the consideration of issues arising due to parameters not listed in Rule 114 is requested and required before considering parameters not listed in the schedules and table. Any such 'other' parameters should be brought to the attention of the SPC immediately.

3.6. Deliverables

The deliverables expected upon completion of the issues evaluation methodology are:

1. List of flagged parameters per intake, identifying those believed to be naturally occurring
2. List of issues with detailed justification for the identification of each issue, noting those believed to be naturally occurring
3. Supporting items, where it is possible, for issue identification such as tables (showing exceedances above the relevant criteria, ranges of flagged parameters), scatter plots (for schedule 1 parameters, can be obtained from watershed characterization report) and time series graphs (showing trends with or without linear regression depending on number of data points)
4. Completed **Appendix A: Issues Evaluation Database**

While the issues evaluation database summarizes the issues evaluation, it is still required to provide deliverables 1, 2 and 3 in a document separate from the completed **Appendix A**.

Appendix A: Issues Evaluation Database

Field Name	Rule Reference	Description of contents	Field Type	Field Size	Choices
Issue_ID	114 & 115(1), (2)	<i>A unique identifier of the issue</i>	AutoNumber	Single (Integer)	N/A
DWS_no	114 & 115(1), (2)	<i>Drinking Water System number for the well, intake or system</i>	Text	10	N/A
Intake_Well_Name	114 & 115(1), (2)	<i>Identify the name or number of the well or intake</i>	Text	50	N/A
Intake_Well_Desc	114 & 115(1), (2)	<i>Include a brief description of the well or intake location and identify whether emergency intake or backup well</i>	Text	250	N/A
Pa_Name	114 & 115(1), (2)	<i>Name of parameter (e.g.: trichloroethylene) or pathogen (e.g.: Cryptosporidium)</i>	Text	50	N/A
Type	114 & 115(1), (2)	<i>Schedule 1, 2, 3 or Table 4 parameter OR pathogen OR 'Other' (not listed in rule 114)</i>	Text	10	Sched1 Sched2 Sched3 Table4 Pathogen Other
Natural	114 & 115(1), (2)	<i>Identify whether the parameter is believed to be naturally occurring</i>	Text	15	Natural Anthropogenic Both?
Description	114 & 115(1), (2)	<i>Describe briefly the nature of the issue and why it was identified as an issue - E.g.: exceeded drinking water standard several times in past 10 years</i>	Text	250	N/A
Issue_Status		<i>Identify whether the parameter was flagged only or has further been identified as an issue</i>	Text	10	Flagged Issue
Contrib_Area	115 (3)	<i>Provide a brief description of the area within vulnerable areas thought to be contributing to the issue</i>	Text	100	N/A
Threat_ID_Plan	116	<i>If information as per rule 115 (3) and (4) cannot be ascertained, a plan needs to be provided to obtain this information in a subsequent Assessment report. Provide a brief description of how you would propose to identify the area and threats which are contributing to this issue</i>	Text	250	N/A
SP_Area	117	<i>Identify the SP Area or areas (outside the SP Area where the issue occurs) in which contributing threats are believed to be located</i>	Text	20	Specify

Appendix B:

(Source: Technical Rules: Assessment Report (December 12, 2008), Clean water Act, 2006)

Rule 114. Without limiting the generality of subclause 15(2)(f) of the Act, the description of drinking water issues shall include the following drinking water issues in respect of the quality of water in a vulnerable area:

Subrule (1) the presence of a parameter in water at a surface water intake or in a well, including a monitoring well related to a drinking water system to which clause 15(2)(e) of the Act applies, if the parameter is listed in Schedule 1, 2 or 3 of the Ontario Drinking Water Quality Standards or Table 4 of the Technical Support Document for Ontario Drinking Water Standards, Objectives and Guidelines and

(a) the parameter is present at a concentration that may result in the deterioration of the quality of the water for use as a source of drinking water; or

(b) there is a trend of increasing concentrations of the parameter at the surface water intake, well or monitoring well and a continuation of that trend would result in the deterioration of the quality of the water for use as a source of drinking water;

Subrule (2) the presence of a pathogen in water at a surface water intake or in a well related to a drinking water system to which clause 15(2)(e) of the Act does apply, if a microbial risk assessment undertaken in respect of the pathogen indicates that

(a) the pathogen is present at a concentration that may result in the deterioration of the quality of the water for use as a source of drinking water, or

(b) there is a trend of increasing concentrations of the pathogen at the surface water intake or well and a continuation of that trend would result in the deterioration of the quality of the water for use as a source of drinking water; and

Subrule (3) the presence of a parameter in water at a surface water intake or in a well, including a monitoring well related to a drinking water system to which clause 15(2)(e) of the Act does not apply, if the parameter is listed in Schedule 2 or 3 of the Ontario Drinking Water Quality Standards or Table 4 of the Technical Support Document for Ontario Drinking Water Standards, Objectives and Guidelines and

(a) the parameter is present at a concentration that may result in the deterioration of the water for use as a source of drinking water, or

(b) there is a trend of increasing concentrations of the parameter at the intake, well or monitoring well and a continuation of that trend would result in the deterioration of the quality of the water for use as a source of drinking water.

References:

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