

Summary of Non-Compliance Events

Drinking Water System	Responsibility/ Operating Authority	Legislative Requirement	Statement of Non-Compliance	Immediate Action Taken	Risk to Drinking Water Safety and Public Health	Control Measures
Palgrave - Caledon East	Region of Peel	Permit to Take Water (PTTW) #P-300-2095321129, Condition 3.2 (Table A) The raw water flow rate for Caledon East Well 3 shall not exceed 1,776 L/min	On July 23rd, 2022, Operator arrived on site at 11:17 pm, in response to an alarm that shut down the well. The Operator performed corrective actions before re-starting the treatment system. Upon well start-up, raw water flow spiked above the permitted rate of 1,776 L/min to a peak of 1,938 L/min for 9 minutes from 12:21 am to 12:30 am on July 24th. The daily water taking was in compliance.	Operator was present when exceedance occurred. Based on discussion with operations staff, It is believed that there was entrapped air in the well header which made its way to the Singer flow control valve, restricting it from achieving the set flow rate. The raw water flow cleared the valve of the trapped air within a few minutes. There was no further corrective action taken.	NONE Brief exceedance of the water taking limit had no impact on the safety of the drinking water supply and posed no risk to public health.	Water flow meters have alarms that are triggered when the high flow rate setpoints are reached. Operators are dispatched to site to troubleshoot and take the necessary corrective action to restore flow to within permitted rates.
South Peel Distribution System	Region of Peel	Municipal Drinking Water Licence # 009-101, Schedule B, Section 10.1 Water systems must not discharge a contaminant into the natural environment that causes, or is likely to cause, an adverse effect.	On several occasions throughout 2022, water emerging from a watermain break picked up soil (silt) and washed it into nearby storm sewers or waterbody until the water supply was isolated for watermain repair efforts to be initiated.	All the events were reported to the Ministry appropriately. The Region of Peel Environmental Control immediately responds to these events to assess impact to fish, wildlife, or plant life and report the event to the Ministry.	NONE	During these unplanned events, staff strive to maintain drinking water system pressure to ensure the integrity of the drinking water supply, and also minimize impact on the environment and the public.
	Region of Peel	Watermain Disinfection Procedure Continuous feed method of watermain disinfection requires a minimum 24-hour contact time.	On May 25-26, 2022, Operations staff disinfected a 4" water service line into a townhouse complex and subsequently connected it to the South Peel Distribution System. The disinfection record showed that contact time between disinfectant residual testing was 10 minutes short of the 24-hour requirement. The disinfection record also shows that dechlorination flushing was commenced beyond the 24-hour contact time requirement.	Upon discovery of this finding through routine review of completed disinfection records, Peel staff examined investigated the accuracy of the recorded times, confirming post-contact time measurement was indeed 10 minutes too soon to demonstrate the chlorine concentration present after the minimum required 24 hour duration was not achieved. This finding was reported to the Ministry via email.	LOW The required contact time with highly chlorinated disinfectant solution was achieved prior to the pipe being flushed. This indicates that the pipe interior was adequately disinfected for the protection of water safety and public health.	The operations staff involved were reminded that after contact time chlorine readings must be taken no sooner than 24 hours after the last reading on the previous day. Training on Watermain Disinfection Procedure requirements was delivered to all Operations staff who perform disinfection work, and will recur annually.
	Region of Peel	Municipal Drinking Water Licence # 009-101, Schedule B Section 16.2.6 Operations and maintenance manual shall include procedures for the operation and maintenance of monitoring equipment. Section 16.4 All of the procedures included or referenced within the operations and maintenance manual must be implemented.	A review of handheld chlorine analyzer digital verification records for 2022 showed that verifications were not completed monthly for many handheld analyzers, as required by the procedure. Maintenance of handheld testing equipment and documentation transitioned from being a manual process to digital, with auto-reminders when verification is not completed within specified time. New process implementation presented a few gaps, which resulted in some handheld chlorine analyzers not verified every month. Also, the process for ensuring completion of records for verification-pending units was found to be inconsistent.	Upon a discovery of this finding, operations staff have been reviewing the process to identify the cause of auto-notification on equipment verification not being actioned in a timely manner and to update the process path.	LOW Handheld chlorine analyzers are manufacturer factory-calibrated to ensure accurate and reliable measurement results. Monthly checks have been implemented to test instrument response and accuracy for added confidence. In addition, continuous chlorine analyzers at water storage and pumping facilities provide confidence of secondary disinfection being maintained.	Staff are working to refine the digitized process to prevent incidences of missing verification records, including documenting when a unit is taken out of active use, and ensuring units are verified monthly as required.
	OCWA	Ontario Regulation 170/03 Schedule 16-7(3) Within 24 hours of an immediate verbal report of adverse water quality, Owners/Operators must complete and submit a written report to the Ministry and Public Health Unit	On Friday August 5, 2022, an operational finding was reported as an adverse water quality incident. Due to internal miscommunication, OCWA surpassed the 24 hour window for submission of the written report for this incident to the Ministry and Public Health Unit.	On the morning of Monday August 8, 2022, as soon as the oversight was discovered, the written report was submitted to the Ministry and Public Health Unit. Peel staff sent a due diligence notification to our Ministry inspector on August 9th to self-declare that the 24 hour timeline was not met for the written report.	LOW Verbal report had been made promptly on August 5th, as required, and corrective actions had been immediately taken. The delayed submission of the written report was purely administrative.	OCWA reviewed the Adverse Water Quality Incident Notification requirements and the existing Adverse Reporting Protocol with Compliance staff to ensure the required timelines are understood and followed.