

November 9, 2004

Ms. Kelly Deeton
Project Manager
CSA
5060 Spectrum Way
Mississauga ON L4W 5N6

Dear Ms. Deeton:

Re: Drinking Water Quality Management Standard Comments

Please find the comments on the Draft Drinking Water Quality Management Standard (DWQMS) as submitted for York Region.

1. Multi-tiered municipalities

Consideration should be given about the requirements of multi-tiered municipalities. These considerations should define whether multi-tiered municipalities are required to register drinking water systems independently or together. York Region has nine local municipalities that operate their own distribution systems. The requirements of the standard should address whether there should be 10 independent DWQMS accreditations or how each of the local systems should interact with the Regional system.

2. Operational Plan Approval

Specific criteria must be defined within the standard regarding the Ministry of the Environment's (MOE) approval of the Operational Plan. These criteria should alleviate overlap between the MOE approval and the third party accreditation auditor's requirements.

3. Staff Competencies

The DWQMS should have additional details regarding 'staff competencies'. 'Staff competencies' has been adequately defined within Ontario Regulation 128/04 regarding the licensing of drinking water operators. It should be made clear whether 'staff competencies' within the DWQMS will be the same as the requirements of Ontario Regulation 128/04 or if there will be additional requirements to be defined by the MOE or the Owner/Operating Authority.

4. Resources

The DWQMS should define 'necessary resources'. In this context, the DWQMS should adequately address whether 'necessary resources' are defined and determined by the Owner/Operating Authority or whether the MOE will be providing guidance.

5. Infrastructure Plan

There should be consideration given for integration of the requirements for the infrastructure plan of the DWQMS with the pending requirements of Bill 175, the Sustainable Water and Sewage Systems Act.

In addition, a definition of the provision of infrastructure within a 'timely' fashion should be provided. Conditions should be made in the DWQMS regarding the participation of outside agencies, such as the MOE or the MNR, in the provision of infrastructure in a 'timely' fashion. The approvals process for some outside agencies for infrastructure may be in excess of what is considered to be provision in a 'timely' fashion.

Sincerely,

Original Signed by Debbie Korolnek

Debbie Korolnek, P. Eng.
Director, Water and Wastewater

DK/jp

Copy to: I. Simanovskis, Manager Water Resources Protection
K. Quinn, Manager, Water and Wastewater Operations
D. Rurak, Manager, Operations Support
C. Pickett, Compliance and Regulatory Technologist
B. Bloxam, Area Supervisor, North Water
B. Little, Area Supervisor, South Water