



January 19, 2006

Transportation and Works Department

Tim Archer
Safe Drinking Water Act, Approvals and Licensing Section
Ministry of the Environment
2 St. Clair Avenue West, 19th Floor
Toronto, ON M4V 1L5

Dear Mr. Archer:

**Re: Drinking Water Quality Management Standard Comments
EBR Registry Number PA05E0033**

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 to 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. Definition of 'Top Management'

Additional consideration should be given as to whether this definition is intended to include municipal council or should be restricted to the more immediate management structure (e.g. departmental)

3. Operational Plan

The format and specific criteria for the Operational Plan must be defined within the standard. York Region suggests that templates be provided from the pilot study areas. Additionally, item '1.11 Personnel Coverage', should be considered in the context of a unionized environment. York Region does not currently have a specific response time built into its collective bargaining agreement and it is assumed that staff will arrive 'as soon as possible'. Negotiating an alternative clause may be quite difficult and time consuming.

4. 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, Conservation Authorities 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.

5. Accreditation Process

No detail has been provided in the draft standard regarding the accreditation process. York Region currently has an ISO 9001:2000 program and there is no mention about what equivalency, if any, will be granted for existing systems. The unnecessary duplication of existing management systems should be avoided and provisions for harmonization should be provided, as applicable. There is also no further discussion about what external party will be conducting the accreditation process and how they will be related to the MOE.

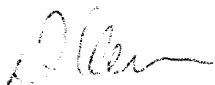
6. Implementation of the audit program requirements

Additional information should be provided to municipal drinking water system owners and/or operators regarding the sharing of information between external auditors and the MOE. It is suggested that if the ISO 9000:2000 structure is governing the DWQMS, findings of the external auditor should be considered confidential and not shared with the MOE. Sharing information would possibly constitute a conflict of interest for external auditors and would be contrary to the MOE policy of promoting the use of internal auditing and open assessment of internal practices without the concern that the ministry would use this information for enforcement purposes.

In addition, there is no detail provided regarding audit scheduling requirements from an internal or external perspective.

It would be very useful if the ministry would provide further detailed information on the DWQMS process for public review and comment before finalizing this initiative. It is very difficult to assess and provide meaningful comments without the benefit of the "complete package".

Sincerely,



Debbie Korolnek, P. Eng.
General Manager, Water and Wastewater

DK/cd

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