

November 26, 2019

Leo Luong, Manager
Water Policy Section
Ministry of the Environment, Conservation and Parks
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Public Works

10 Peel Centre Dr.
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Re: Amendments to the Wells Regulation, ERO number 013-1513

Dear Mr. Luong:

We want to thank you for the opportunity to comment on the proposed amendments to the Wells Regulation (R.R.O. 1990, Regulation 903 under the *Ontario Water Resources Act*). Region of Peel staff do appreciate the Ministry's efforts to reduce the administrative burden on the well construction industry and align with current international standards, while maintaining protection for the environment, public health and safety and well owners. It is hoped that these modernizing requirements for well construction will achieve the desired benefits for municipalities and other stakeholders.

Region of Peel staff have recommendations to strengthen some of the proposed changes to the Wells Regulation as outlined in this letter.

Update Well Casing Standards: Provide clear and specific condition

It is recommended that the well casing standards include clear specifications for selecting well casing for high yield wells where impact on well performance and efficiency can be important. This would be an alternate to relying on well technicians to exercise professional judgement on the selection of casing. It is therefore suggested that every well contractor or well technician are licensed to be deemed a Qualified Person, as defined by the regulation.

Also, well casing should be properly described to match the requirements for well casing under the proposed draft "*Determination of Minimum Treatment for Municipal Residential Drinking Water Systems Using Subsurface Raw Water Supplies*", which the Ministry is planning to introduce in the coming months. If implemented, this change ensures all new municipal supply wells will have to be drilled and designed as Category 1 wells; wells that are deemed low risk and reliably supply source water of high physical and chemical quality.

Allow Placement of Shallow Well Screens for Test Holes and Dewatering Wells

Region of Peel staff support allowing the placement of well screens shallower than 2.5 metres below the ground surface. Allowing the placement of shallow screens for test holes and dewatering wells is a helpful addition to the regulation. This will help the efforts of dewatering under construction where temporary shallow dewatering wells can be placed, a practice that is not currently permitted.

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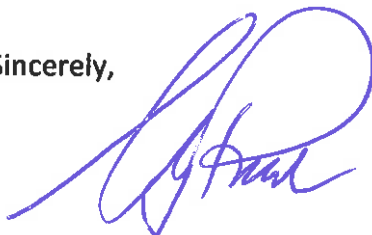
Other Recommended Change to the Wells Regulation

As your Ministry consults on its proposed changes to the Wells regulation, Region of Peel staff would like to take this opportunity to recommend a change to another part of the existing Wells Regulation.

In the spirit of modernizing requirements and aligning to current international standards, it is recommended that well contractors have the flexibility and choice to follow the American Water Works Association procedure for well disinfection. Currently, the contractors are restricted to adhering to the well disinfection procedure in the existing regulation.

If you have any questions, please contact Luis Lasso, Advisor, Water Resources Management at luis.lasso@peelregion.ca.

Sincerely,



Anthony Parente
General Manager, Water and Wastewater Divisions
Public Works
Region of Peel