

November 9, 2020

George Jacob
Source Protection Planning Unit
Source Protection Programs Branch, MECP
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Toronto, ON M4V 1M2

Submitted Online via Environmental Registry of Ontario (ERO) website

Re: Proposed amendments to the Director's Technical Rules made under section 107 of the Clean Water Act, 2006 (ERO # 019-2219)

Dear Mr. Jacob:

Oxford County is a two tier municipality located in Southwestern Ontario and is responsible for the provision of drinking water. The County is wholly reliant on groundwater for drinking water. The County is responsible for implementing Part IV policies from four Source Water Protection Plans across the County. As such, we thank you for the opportunity to provide comments on the Provincial proposal to update the Director's Technical Rules.

The County is supportive of updating the Director's Technical Rules, but do, however, have a few comments regarding clarity and expectations.

General Comments:

- Clarification is needed regarding specific timelines for compliance with the amendments to the Tables of Drinking Water Threats. It is unclear whether the changes to the threat circumstances apply to new vulnerable areas only or whether they are applied to existing threats as well.
- Clarification is also needed on which amendments are mandatory and which are enabling.
- For changes that are mandatory, clarification on whether the municipality or the SPA is responsible to complete the work is required.
- It is expected that Oxford will have an increase in identified significant threats due to the proposed changes in the Tables of Drinking Water Threats. This is expected to increase staff workload. Under the proposed rules, it is anticipated that Oxford County will identify new salt application threats, additional fuel threats, and possibly an increase in DNAPL threats. Several amendments to the Source Protection Plan will also be required.

Issue Contributing Areas:

- Clarification is needed on what type of “evidence of contribution” is required to delineate a WHPA-ICA. Additional technical guidance regarding delineating WHPA-ICAs would be helpful to ensure Ministry expectations are being met.

Handling and Storage of DNAPLs:

- Additional guidance on what constitutes a DNAPL would be useful. Identifying DNAPLs will be more difficult since the proposed removal of DNAPL chemicals from the threat definition.

Thank you again for the opportunity to comment on the Provincial proposal to update the Director’s Technical Rules. Should you have any questions regarding the content of this letter, please contact the undersigned at 519-539-9800 ext. 3126 or cbanting@oxfordcounty.ca.

Yours truly,

Cassandra Banting
Source Protection Coordinator
Oxford County