

January 25, 2021

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Public Works

10 Peel Centre Dr.
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peelregion.ca

Re: ERO 019-2787- Proposed Updates to the Director's Direction – Minimum Requirements for Operational Plans

Dear Mr. Manning:

Thank you for providing us the opportunity to comment on ERO 019-2787- Proposed Updates to the Director's Direction – Minimum Requirements for Operational Plans. These requirements are important to municipalities as they provide instructions respecting the preparation and content of operational plans prepared by owners of municipal residential drinking water systems. Region of Peel staff support the Ministry's proposal to update the minimum requirements for Operational Plans and presents comments on the proposed updates to the Director's direction in anticipation of greater clarity being provided by the Ministry. .

3.0 Operational Plans – Content Requirements

3.0.3 Region of Peel staff welcomes the formal addition of flexibility in preparation of a single operational plan for multiple subject systems under the same owner and operated by the same operating authority. The Region of Peel staff recommends that the direction provides added flexibility for the required content of the operational plan to be included or referenced within, at the discretion of the owner and the operating authority. This would clarify the Ministry's expectation and remove the potential for differing interpretation and duplication of information/data housed in periodic reports required under the Safe Drinking Water Act, 2002.

3.3 Requirements for all Operational Plans

3.3.1 Numerals 1. and 2. refer to a version number and date being recorded on every page (physical copy) and embedded in every electronic copy. The Region of Peel staff is seeking clarification on the Ministry's expectation for every page of the operational plan (physical or digital copy) including the same date or version number.

Currently, the document management and control processes are established and implemented at the owner's or operating authority's discretion. The Region of Peel operational plan comprises of individual procedures that reflect each element of the Drinking Water Quality Management Standard respectively. While version numbers and dates are the same on each page of each procedure, they are not the same for the entirety of the operational plan.

The Region of Peel recommends that the document control flexibility exists to allow for editing of each section of the operational plan without the need to print the whole operational plan when changes are applied within one element.

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3.3.2 The Region of Peel asks that the word “shall” under numeral 2. is deleted as the requirement to execute the Ministry’s direction is provided in the opening statement “For operational plans that are required under the SDWA or otherwise to be submitted to the Director **shall**.”

Section 5.0 Public Disclosure of Operational Plans

5.0.4 To align this direction with the commitment of the quality management policy for safe drinking water and vulnerability of water systems outlined through risk assessment, Region of Peel staff suggests adding the following condition: “could reasonably be expected to threaten the safety and quality of the drinking water”.

Schedule A

The Region of Peel recommends adding a definition for the term “principal office” referenced in section 5.0.2. This will allow flexibility for owners and operating authorities to house a physical copy of the operational plan in a location that is frequented by the members of the public.

Also, the Region of Peel sees the opportunity to reference the Ontario Drinking Water Quality Management Standard definition for ‘subject system’, which would remove duplication of having this term defined in two documents.

Conclusion

Thank you for the opportunity to comment on the proposed updates to the Director’s direction - Minimum Requirements for Operational Plans. We look forward to receiving the final version of the Director’s direction and how it relates to our responsibility as an owner of a municipal drinking water systems to the preparation and content of our operational plans.

If you have any questions, please contact Justyna Burkiewicz at justyna.burkiewicz@peelregion.ca or at 905-791-7800 ext. 4494.

Sincerely,



Elvis Oliveira
Director, Water Division
Public Works
Region of Peel