

Date: July 4, 2024
Time: 1 pm
Location: Rideau Valley Conservation Authority
 3889 Rideau Valley Drive, Manotick

Source Protection Committee Meeting

| Item Number | Item Title | Page | Person Responsible |
|-------------|---|------|--------------------------|
| 1.0 | Welcome and Introductions a. Agenda Review b. Notice of Proxies c. Adoption of the Agenda (D) d. Declarations of Interest e. Approval of Minutes –April 4, 2024 (D) ▶ draft minutes attached as a separate document f. Correspondence from Jim Hunt, Trent Conservation Coalition SPC Chair, to Minister Khanjin(I) | 1-3 | <i>Interim Chair</i> |
| | Staff Reports, Updates and Presentation | | |
| 2.0 | Source Protection Staff Update (presentation)(I) | | |
| 3.0 | Source Protection Plan & Assessment Report Amendments(D) | 4-5 | <i>Marika Livingston</i> |
| | Other | | |
| 4.0 | Other Business | | <i>Interim Chair</i> |
| 5.0 | Member Inquiries | | <i>Interim Chair</i> |
| 6.0 | Next Meeting -TBD | | <i>Interim Chair</i> |
| 7.0 | Adjournment | | |

(I) = Information (D) = Decision

Delegations: If you wish to speak to an item on the Agenda please contact Marika Livingston before the meeting (marika.livingston@mrsourcewater.ca) or 613-692-3571 x 1148)

If you are a member of the public and would like to join the Zoom meeting please contact the above for more meeting details.



June 10, 2024

The Honorable Andrea Khanjin
Minister of the Environment, Conservation and Parks
College Park 5th Floor
777 Bay Street
Toronto On, M7A 2J3

Dear Minister Khanjin,

I congratulate you on your appointment last year, as the Minister of the Environment, Conservation and Parks. This is an extremely important portfolio and it's management is vital to the health and welfare of the people of Ontario.

As one of the few remaining original Chairs of a Source Protection Committee in Ontario, established under the *Clean Water Act, 2006*, I have seen this important program successfully evolve across the Province. The *Clean Water Act, 2006* was established in response to the water tragedy in Walkerton in May of 2000. It is hard to believe that next spring will mark the 25th Anniversary of those devastating and tragic events which resulted in seven deaths and about 2,000 people becoming violently ill, many with long term symptoms.

I am very proud to be part of the Source Protection Program helping to protect sources of drinking water in Ontario. The success of this program was the result of strong leadership, partnership and collaboration among your Ministry, Conservation Authorities (Source Protection Authorities) and Source Protection Committees. From the beginning of the program in 2006, the Chairs, Project Managers and Ministry staff would meet regularly to share knowledge, ideas and solutions to some of the problems faced as we were accomplishing something new and innovative.

As we approach the 25th Anniversary of Walkerton, I am concerned about the Ministry's commitment to the program and the optics of the program on two fronts:

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- 1) There has not been an in-person meeting of the Chairs, Project Managers and Ministry staff in over 2 years apparently due to budget constraints. These meetings are so vital and beneficial to the program and the return on investment is extensive. The meetings would be particularly helpful for some of the newer Chairs, Project Managers and Ministry staff.

The Chairs need to be engaged formally with the ministry to share their successes and their challenges. They need the opportunity to illustrate to the Ministry the continuous improvements and efficiencies in program delivery.

- 2) There are currently four Committees in the province without Chairs. Some of these positions have been vacant for close to two years. These vacancies must be filled.

I appreciate that you are relatively new as the Minister of the Environment, Conservation and Parks but I urge you to address these concerns as soon as possible.

We can never become complacent when it comes to protecting our sources of drinking water. That is a lesson that Walkerton taught us all too well. I was privileged to be a participant in the Walkerton Inquiry as counsel for the Manager of the Owen Sound District Office of the Ministry the Environment.

Ideally, the 25th Anniversary of the Walkerton tragedy should be a time to acknowledge all that has been done to ensure the provision of safe drinking water in the province including Source Protection.

This Source Protection partnership between the Minister of the Environment, Conservation and Parks, Source Protection Authorities and the Source Protection Committees needs strong, continued support and collaboration now and into the future. I look forward to continuing as your appointed Chair on the Trent Conservation Coalition Source Protection Committee and continuing our important work.

If I can be have any further assistance please let me know.

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Yours very truly,

p.p. 

Keith Taylor

Jim Hunt
Chair,
Trent Conservation Coalition Source Protection Committee

Cc: Conservation Ontario – Angela Coleman
Lower Trent Region Conservation Authority Chair – Bob Mullins
Trent Conservation Coalition GM/CAO – Rhonda Bateman
Trent Conservation Coalition Program Coordinator – Keith Taylor

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3.0 Source Protection Plan and Assessment Report Amendments

Date: June 17, 2024

To: Mississippi-Rideau Source Protection Committee

From: Marika Livingston, Project Manager
Mississippi-Rideau Source Protection Region

Recommendation:

That this staff report **Be Received** by the Mississippi-Rideau Source Protection Committee; and,

That staff **Be Directed** to revise the Source Protection Plan and Assessment Reports as recommended within this report; and,

That the resulting updates **Be Included** in the amended Mississippi-Rideau Source Protection Plan, Mississippi Valley Assessment Report and the Rideau Valley Assessment Report for further consultation.

Background

On November 14, 2018, our Section 36 Workplan was submitted to Ministry of Environment, Conservation and Parks (MECP) in compliance with the order dated August 27, 2014 under Section 36 of the *Clean Water Act*. On April 15, 2019, we received an amended Order from the Minister, outlining requirements governing the contents and timeframes of the review and process to be followed for any updates.

Since then, staff have been working to execute the revisions outlined in our Order and to align our Source Protection documents with the revised 2021 Technical Rules,

Following the SPC meeting on February 8, 2024, members reviewed the draft amended Source Protection documents and had an opportunity to provide comments before staff submitted to the MECP for Early Engagement.

Supplementary to what was presented and discussed in February, the City of Ottawa has provided a technical memo to support adding the third backup well into production in Richmond. Mapping will be updated. Chapter 5 of the RVCA Assessment Report has been updated and a new appendix is included, Appendix 5-5.

Appendix A includes the previously shared timeline, outlining workplan milestones and tentative future meetings.

Appendix B includes a summary table of the comments received from the MECP and MR staff's proposed response and action. Staff have addressed the comments received, revised copies of the Source Protection Plan and Assessment Reports are found [here](#). Shortcuts to the documents are also found hyperlinked in Appendix B.

Appendix C includes a copy of the Early Engagement comments received from the MECP.

Next Steps

Following the July 2024 SPC meeting, staff will work to put together an information package to commence pre-consultation and share with implementing bodies, which includes other relevant Ministries and our municipal partners.

A Fall SPC meeting will be required to review comments received during pre-consultation and to advance to the next required consultation step, public consultation.

Attachments: Appendix A Timeline
 Appendix B Summary of Comments
 Appendix C MECs Early Engagement Comments

Appendix A: Timeline for Mississippi-Rideau’s S. 36 Source Protection Plan and Assessment Report Updates

| Date | Objectives |
|-------------|---|
| 2023 | |
| October | <p>Source Protection Committee Meeting <u>Drafted Policy</u></p> <ul style="list-style-type: none"> - Best Practices Working Group Policy NLB - Revised Governing Policies document - S. 36 Tentative Timeline |
| November | <p>Work on SPP, AR and Explanatory Document Changes</p> <p>Source Protection Authority Meeting RVSPA Meeting to appoint and renew SPC seats</p> <ul style="list-style-type: none"> - Municipal Surface Water Seat, selected by Councils - Economic, proposed renewal - Economic, proposed renewal - Public, vacant, proposed new appointment. - Public, proposed renewal |
| December | <p>Work on SPP, AR and Explanatory Document Changes</p> <p>Source Protection Authority Meeting</p> <ul style="list-style-type: none"> - MVSPA Meeting to appoint and renew SPC seats |
| 2024 | |
| January | <p>Work on SPP, AR and Explanatory Document Changes</p> |
| February | <p>Finalize Layout and Associated Documents, Annual Reporting</p> <p>Source Protection Committee <u>Draft Policy</u></p> <ul style="list-style-type: none"> - Revisions: Waste, Sewage, Agriculture (NASM), Fertilizer, Pesticides, Road Salt & Snow Storage, Chemical, Fuel - New policies: Hydrocarbon Pipeline, Working Group, Salt & Snow - Richmond—adding backup well - First look at draft SPP, Explanatory Document & Assessment Reports |
| March | <ol style="list-style-type: none"> 1. Work on Annual Reporting 2. Finalize the Amendment Package |
| April | <p>Source Protection Committee Meeting</p> <ul style="list-style-type: none"> - Preview of Amendment Package - Review Annual Reporting <p><u>Other Items for Approval</u></p> <ul style="list-style-type: none"> - Draft Source Protection Plan - Draft Explanatory Document |

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| | | <ul style="list-style-type: none"> - Draft Assessment Report <p>Source Protection Authority</p> <ul style="list-style-type: none"> - Preview Amendment Package - Review Annual Reporting |
| May | | <ol style="list-style-type: none"> 1. Submit Annual Reporting 2. Submit Amendment Package for Early Engagement |
| Mid-Spring (May-June) | Submit for Early Engagement Source Protection Committee Meeting | |
| Late Summer (July-August) | Pre-Consultation | |
| Mid-Fall (September-October) | Source Protection Committee Meeting to review pre-consultation comments Public Consultation | |
| Winter (November-December) | December Submission Deadline Source Protection Committee Meeting <ul style="list-style-type: none"> - to review Public Consultation comments - finalize submission | |
| TBD | Source Protection Authority Meetings <ul style="list-style-type: none"> - Present final submission | |

Comments received May 2024—Early Engagement comments from Nigel Holgate and George Jacoub

| Comment/ Question/ Suggestion | From | Staff response | Addressed Y or N | AR/SPP/ED | Chapter or Section Page # |
|--|------|---|------------------|---------------|--|
| Remove the wording “Provincial Tables of Circumstances” | MECP | Will be addressed | Y | MV & RV AR | RV Ch.4- Pg.4-9 MV Ch.4- Pg.4-9 |
| When referencing the threats tool in identifying low, moderate and significant threats, ensure the text also refers to the legal reference of Part XII of the 2021 Technical Rules | MECP | Will be addressed | Y | MV & RV AR | RV Ch.4- Pg.4-9 MV Ch.4 Pg.4-9 |
| Clarify where the centroid of the 500m grid is located | MECP | The centroid is located with the Source Protection Region, which is identical to the 2011 AR approach when using the 1x1km grid | Y | MV & RV AR | RV Ch.5 Page 5-16 MV Ch.5 Pg.5-18 |
| These sections need to be removed as they refer to managed lands and imperviousness water quality risks for SGRAs | MECP | Will be addressed | Y | MV & RV AR | RV Ch.5 Sec. 5.2.3 and 5.2.4 MV Ch.5 Sec. 5.2.3 and 5.2.4 |
| Confirm that this map will be removed from the updated package | MECP | Will be addressed Removed from list of figures and figure deleted | Y | MV & RV AR | Ch 5 Figures Figure 5-3d |

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| Clarify why the application of road salt has not been enumerated as a significant risk | MECP | Will be addressed, this was an oversight | Y | MV & RV AR | MV Ch.5 Tables RV Ch. 5 Tables |
| Confirm that Table 5-3 has been enumerated based on the 2021 TRs threats and circumstances | MECP | Will be addressed | Y | MV & RV AR | MV Ch.5 Tables RV Ch. 5 Tables |
| New Ch 5 Table with refined threat counts | MECP | This comment requested refining the threats tables to reflect the new Technical Rules. These tables have been significantly refined over the last 10+ years, but has been refined on a Region basis, and not the individual Areas. We were verbally advised by MECP to include a new table with the latest threat numbers which are available for the SPR, but not the Areas. This table is almost identical to what is submitted to the Province annually in April in our Annual Progress Report. | Y | MV & RV AR | MV Ch. 5 Tables New Table 5-4 RV Ch. 5 Tables |
| Expand Table 5-3 to include the Hydrocarbon Pipeline | MECP | Will be addressed | Y | MV & RV AR | MV Ch. 5 Table 5-4 |
| Remove the old 2013 or 2017 reference numbers of the threats circumstances and replace them with the new circumstances where needed. Remove the term ICA and replace it with area potentially contributing contaminants to avoid confusion with ICAs where plan policies may apply. | MECP | Will be addressed. Found no mention of ICAs | Y | MV & RV | MV Ch. 5 Table 5-5 |

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| Correct reference of 80% as it refers to the old thresholds | MECP | Will be addressed. | Y | RV AR | RV Ch.5- Sec. 5.7.5, Pg. 5-46 |
| Extending IPZ-2 of Carleton Place Intake to include the Mississippi Shores sub-division without calculations does not meet the TR 65 requirement and, therefore, it is required that this extension altered from the setback should meet the travel time criteria. Table 6-xiii and other relevant tables shall be updated to reflect the change | MECP | Staff clarified how the sewershed was included. Staff have consulted with George Jacoub, who supports the revised text. | Y | MV AR | Ch. 6 Text Page 6-16, 6-17 & 6-30 |
| Clarify why the grid of 1kmx1km is used for assessing the imperviousness of the surface water system and not 500mx500 m as used for the groundwater drinking water systems | MECP | This was an oversight. It will be addressed. Figures are completed properly with the 500m grid. | Y | MV & RV AR | MV Ch. 6 Text Page 6-28 RV Ch. 6 Text Page |
| Clarify why the application of road salt has not been enumerated. Confirm that Table 6-3 has been enumerated based on the threats and circumstances of | MECP | Will be addressed. | Y | MV & RV AR | MV Ch. 6 Table 6-3 & 6-4 RV Ch. 6 Table 6-2 & 6-3 |

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| the 2021 Technical Rules. Expand table 6-3 to include the Hydrocarbon Pipeline. | | | | | |
| Ensure that all sub-category threats listed in threats tables, enumeration tables, and risk tables are updated to align with the names of these sub-categories as per the 2021 TRs. | MECP | Will be addressed | Y | MV & RV AR | MV Ch. 6 Tables RV Ch. 6 Tables |
| Please provide the technical study supporting the findings of the Climate Change Vulnerability Assessment Tool | MECP | CO & MECP CCVAT Summary template is now included under 7.4 Case Studies | Y | MV & RV AR | MV Ch. 7 Text Page 23 RV Ch. 7 Text Page 23 |
| Clarify and provide the reason why the information, knowledge, and gaps identified since the first approved assessment report remain as in this proposed amendment. | MECP | We didn't revise any of the technical work, so we weren't able to have information to revise this Chapter. Add note, that this Chapter wasn't revised in the S. 36 Update. | Y | MV & RV AR | RV Ch. 8 Text MV Ch. 8 Text |
| Clarify why the areas for potential DNAPL significant risks to IPZs scored 9 and 10 have not been mapped in Map 9-6 as it was done for WHPAs. Ensure the content of tables reflects the | MECP | Perry will change the legend to read: Groundwater DNAPL zones only Table 9-6 will not be updated, similar to how we responded to Ch 5 & 6 Table updates. | Y N | MV & RV AR | RV Ch. 9 Figure 9-6 RV Ch. 9 Figure 9-6 |

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| enumeration of significant threats and risks, Update Table 9-6 | | | | | |
| Title of the appendix sections should be indicated for Appendices A, B, C | MECP | Add titles into the Table of Contents | Y | ED | Table of Contents |
| Add section for Pipeline Policy | MECP | Will be addressed | Y | ED | ED Section 4.13 Page 89 |
| Regularly update MECP on the implementation and delivery of policy as it is an E/O policy intended to address a significant threat. Indicate which monitoring policy is responsible for this. Please clarify whether the policy is legally binding, as the Policy Brief states "LB" but the policy title in the explanation states "NLB". | MECP | SALT-EDU-7 should be LB not NLB Captured under our monitoring policies already. | Y N | ED | Ex. Doc 4.3 SALT-EDU-7-LB Pages 47-50 |
| DNAPL should be capitalized | MECP | Will be addressed | Y | ED | ED Section 4.4 Page 50 |
| Add policy EDU-7-NLB into the Policy Brief chart; add summary of the working group education policy after | MECP | Will be addressed | Y | ED | ED Section 4.16 Page 101-103 |

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| the EDU-6-NLB explanatory paragraph | | | | | |
| Add title to file name | MECP | Will be addressed | Y | SPP | Appendix B |
| Edit preamble to read (RPRA) Hazardous Waste Registry | MECP | Will be addressed | Y | SPP | Section 3.1 |
| Amend to read “registered with RPRA waste generating reporting system” & “RPRA manifest process” as the RPRA is now responsible for these processes | MECP | Will be addressed | Y | SPP | Section 3.1 WASTE-2-LB-S58, WASTE-4-LB-S57 |
| Join paragraphs in policy SEW-2-LB | MECP | Will be addressed | Y | SPP | Section 3.2 |
| Note that sewer mains in a wastewater collection system are significant threats in a WHPA area scoring 10 if they handle over 10,000 m ³ /day. | MECP | Sewer mains are under 3.2.3 not 3.2.5 Nothing further required | Y | SPP | Section 3.2.5 |
| Significant Threat Circumstances: switch bullets #1 and 3. Clarify that 10-20kg of salt is a significant threat when exposed to precipitation in WHPA/IPZ as appropriate. Indoor storage of salt not considered a significant threat, but may be a medium or | MECP | We will not be adding medium to low threat context Nothing further required | Y | SPP | Section 3.3 |

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| low threat based on quantity. | | | | | |
| Please clarify who the policy is directed at. Storage of less than 10kg of salt exposed to precipitation or runoff is not a SDWT – explain the prohibition of all quantities. Note that quantities from 100-300kg of salt partially exposed to precipitation or runoff is classified as a SDWT. Please explain the actions under this policy to address this quantity. | MECP | <p>The policy is directed at Risk Management Officials.</p> <p>The starting 10kg threshold for exposed salt was added</p> <p>Salt that is partially exposed from 100kg up to 300kg will be subject to the targeted education and outreach initiative.</p> <p>300kg and up will be subject to RMP.</p> <p>Staff discussed this with MECP, nothing further required.</p> | Y | SPP | Section 3.3 SALT-8-LB |
| For clarity on significant threat circumstances, please add “at least” when indicating the volume of liquid fuel classed as a SDWT. | MECP | Will be addressed | Y | SPP | Section 3.5.1, 3.5.2 |
| Please clarify as to which section these belong and provide rationale. When is it “disposal of waste” as specified in section 3.1 or NASM application in section 3.10? | MECP | Added clarifying statement identifying when waste biomass and POW is managed as a waste threat versus a NASM threat. | Y | SPP | Section 3.1, 3.10 Handling, storage, and application of processed organic waste (POW) |

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| insert a hyphen between "non legally" or change to "not" | | Will be addressed | Y | SPP | Section 3.13 |
| Specify if liquid hydrocarbon pipelines also exist in lower threat areas. A policy for pipeline regulatory agencies (TSSA, CER, OEB etc) to suggest they consider source protection in planning may also be useful - contacting pipeline regulators for future projects in MRCA may be useful. | MECP | Pipeline does not intersect in lower threat areas. Policy suggestion considered. | Y | SPP | Section 3.13 PIPE-1-NLB |

**Ministry of the Environment,
Conservation and Parks**

Conservation and Source Protection
Branch

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40 St. Clair Ave. West
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**Ministère de l'Environnement, de la
Protection de la nature et des Parcs**

Direction de la protection de la nature et
des sources

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40, avenue St. Clair Ouest
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May 22, 2024

To: Marika Livingston, Source Protection Program Manager
Mississippi-Rideau Source Protection Region

From: Nigel Holgate, Program Analyst
Conservation and Source Protection Branch

Re: Early Engagement Comments on Mississippi-Rideau Section 36 Minister's Order
Proposed Amendments

Thank you for the opportunity to review the proposed changes to the assessment report and source protection plan as part of your early engagement activities for Mississippi-Rideau's section 36 submission.

Conservation and Source Protection Branch (CSPB) technical staff have reviewed the technical reports against the 2021 Technical Rules. The comments provided are intended to improve technical accuracy or to assist in the implementation of the policies. We look forward to receiving a draft of the amended assessment report and plan when available. If you have any questions, please do not hesitate to contact me directly.

Thank you,

Nigel Holgate

Program Analyst, Conservation and Source Protection Branch

(289) 962-3912

Nigel.Holgate@ontario.ca

Cc: Jennifer McKay, Manager, Source Protection Section, CSPB
Wendy Lavender, Manager, Technical and Delivery Program Section, CSPB
George Jacoub, Watershed Management Research Scientist, P.Eng., CSPB

Ministry Technical Comments

Part I: Mississippi Valley Assessment Report (MV-AR):

- 1) Ch.4- Pg.4-9: Remove the wording “Provincial Tables of Circumstances,” as they are no longer valid and replace it with the Tables of Drinking Water Threats and Circumstances as outlined in Part XII of the 2021 Technical Rules. Also, when referencing the threats tool in identifying low, moderate and significant threats, ensure the text also refers to the legal reference of Part XII of the 2021 Technical Rules.
 - ❖ The same comment applies to Ch 4- Pg. 4-7 of the RV-AR
- 2) Ch.5- Pg.5-18: Clarify where the centroid of the 500m grid is located, e.g., with the Source Protection Region (SPR) region or each Source Protection Area (SPA).
 - ❖ The same comment applies to Ch.5- Pg. 5-16 of the RV-AR.
- 3) Ch.5- Sec. 5.2.3 and 5.2.4: Since Significant Groundwater Recharge Areas (SGRAs) are no longer areas used for assessing water quality risks, these sections need to be removed as they refer to managed lands and imperviousness water quality risks. Should the the SPA/committee wishes to retain this section as general information, the section should not be linked to any water quality threats under the technical rules, and rather, it could be part of the watershed characterisation.
 - ❖ The same comment applies to Ch.5- Pg. 5-22/23 of the RV-AR.
- 4) Ch.5- SGRAs – Imperviousness figure 5-3d: please confirm that this map will be removed from the updated package, aligning with the removal of the text on pages 5-26.
 - ❖ The same comment applies to the RV-AR applied.
 - Ch.5- Tables: Clarify why the application of road salt has not been enumerated as a significant risk, given the percentage of imperviousness is greater than 30 % in areas scored 10, and where appropriate, edit the text explaining these risks in the relevant sections of each drinking water (DW) system as well as Tables 5-6 (Almonte) and 5-8 (Carp).
 - Confirm that Table 5-3 has been enumerated based on the 2021 TRs threats and circumstances, and where changes occur, the AR text should reflect the significant risks identified.
 - Expand Table 5-3 to include the Hydrocarbon Pipeline (threat # 22) with the correct enumeration (if any) or N/A.
- 5) Ch.5- Table 5-4: Remove the old 2013 or 2017 reference numbers of the threats circumstances, as they are no longer valid under the 2021 TRs, and replace them with the new circumstances where needed. In addition, although the term ‘Issue Contributing Area (ICA)’ was used in a previously approved assessment report for the non-municipal drinking water systems, it is suggested that this term be changed, e.g. area potentially contributing contaminants, as these areas are not subject to SP plan and avoid confusion with the ICAs where activities are subject the SP plan policies. The maps of those areas can remain as is, subject to your discretion.
 - ❖ The same comment applies to Ch.5- Table 5.3 of the RV-AR.
- 6) Ch.6- pg.6-15, 6-29 and 6-30: Extending IPZ-2 of Carleton Intake to include the Mississippi Shores sub-division without calculations does not meet the TR 65 requirement and, therefore, it is required that this extension altered from the setback should meet the travel time criteria. Please address it alternatively, as it could be part of IPZ-3. Where this is

confirmed within the 2 hrs time of travel, Table 6-xiii and other relevant tables shall be updated to reflect the change proposed to the IPZ-2, e.g. percentage of land, number of outfalls, transport pathways, etc. and confirm whether these changes will alter the area vulnerability score currently scoring 9.

- 7) Ch.6- Pg.6-28: Clarify why the grid of 1kmx1km is used for assessing the imperviousness of the surface water system and not 500mx500 m as used for the groundwater drinking water systems.
 - ❖ The same comment applies to Ch.6- Pg. 6-28 of the RV-AR.
- 8) Ch.6- Tables:
 - Clarify why the application of road salt has not been enumerated as a significant risk, given that the percentage of imperviousness is 6 and 8% in areas scored 9-10.
 - Confirm that Table 6-3 has been enumerated based on the threats and circumstances of the 2021 Technical Rules, and where changes occur, the AR text should reflect the significant risks identified.
 - Expand table 6-3 to include the Hydrocarbon Pipeline (threat # 22) with the correct enumeration (if any), even if it is N/A.
- 9) Ch. 7- Sec. 7.4.1: Please provide the technical study supporting the findings of the Climate Change Vulnerability Assessment Tool (CCVAT) application in Sec. 4.7.1, addressing the TR 16.1 requirements, specifically the resilience of the drinking water system to climate impacts. Changes due to this comment should be reflected in Ch.7 of RV-AR.
- 10) Ch. 8- Data Gaps: Clarify and provide the reason why the information, knowledge, and gaps identified since the first approved assessment report remain as in this proposed amendment.
 - ❖ The same comment applies to the RV-AR.
- 11) Ch. 9:
 - Clarify why the areas for potential DNAPL significant risks to IPZs scored 9 and 10 have not been mapped in Map 9-6 as it was done for WHPAs.
 - Ensure the content of tables reflects the enumeration of significant threats and risks, e.g. tables 9-2, 9-4 and 9-5, after addressing comments 5 and 9.
 - Update Table 9-6, given comment # 6 above, to align with the 2021 TRs listing the threats and circumstances.

Part II: Rideau Valley Assessment Report (RV-AR):

- 1) Ch.5- Sec. 5.7.5, Pg. 5-46: Correct reference of 80% as it refers to the old thresholds and replace it with the appropriate percentage to align with Map 5-7-4b.
 - Ch.5- Tables: Clarify why the road salt application has not been enumerated for the RVSP DW systems, except Kemptville, given that the percentage of imperviousness is greater than 30 % in areas scored 10; and where appropriate, edit the text explaining these risks in the relevant sections of each DW system as well as Tables 5-7, 5-9, 5-11, and 5-13.
 - Confirm that the enumeration of Table 5-2 and other associated DW systems enumeration tables have been completed based on the threats and circumstances of 2021 TRs, and where changes occur, the AR text should reflect the significant risks identified.
 - Expand table 5-2 to include the Hydrocarbon Pipeline (threat # 22) with the correct enumeration (if any), or N/A.

2) Ch.6- Tables:

- Clarify why road salt application has not been identified as a significant risk in the Lemieux IPZ-1, which scored 9 with imperviousness greater than 8%, and, where appropriate, edit the text explaining these risks in the relevant sections and threats enumerations tables. The same comment applies to Perth IPZs, which scored 9 and 10 crossing a grid with imperviousness greater than 8%.
- Ensure that all sub-category threats listed in threats tables, enumeration tables, and risk tables are updated to align with the names of these sub-categories as per the 2021 TRs. For example, the threat “ Sewage System or Sewage Works - Sanitary Sewers and related pipes” has been replaced with two different sub-categories under the 2021 TRs, which are “*Wastewater Collection Facilities and Associated Parts: Sanitary Sewers*” and “*Wastewater Collection Facilities and Associated Parts: Sewage Pumping Station or Lift Station Wet Well, a Holding Tank or a Tunnel*”.
- Expand table 6-2 to include the Hydrocarbon Pipeline (threat # 22) with the correct enumeration (if any), even if it is N/A.
- Confirm that the enumeration of Table 6-2 and other associated DW systems enumeration tables have been completed based on the threats and circumstances of 2021 Technical Rules, and where changes occur, the AR text should reflect the significant risks identified.

3) Ch.9: Comments # 12 of MV-AR apply, in addition to comment #3 of RV-AR.

Ministry Policy and Administrative Comments

| AR/SPP Section | Policy / Issue | Comment |
|------------------------|-----------------------------------|---|
| ED Table of Contents | admin | Title of the appendix sections should be indicated for Appendices A, B, C |
| ED Table of Contents | admin | add section for Pipeline Policy |
| Source Plan Appendix B | admin | Add title to file name |
| Ex. Doc 4.3 | SALT-EDU-7-NLB | Regularly update MECP on the implementation and delivery of policy as it is an E/O policy intended to address a significant threat. Indicate which monitoring policy is responsible for this. Please clarify whether the policy is legally binding, as the Policy Brief states “LB” but the policy title in the explanation states “NLB”. |
| Ex. Doc 4.4 | admin | DNAPL should be capitalized |
| Ex. Doc 4.16 | admin | add policy EDU-7-NLB into the Policy Brief chart; add summary of the working group education policy after the EDU-6-NLB explanatory paragraph |
| SWP Plan 3.1 | Admin | Edit preamble to read (RPRA) Hazardous Waste Registry |
| SWP Plan 3.1 | WASTE-2-LB-S58, WASTE-4-LB-S57 | Amend to read “registered with RPRA waste generating reporting system” & “RPRA manifest process” as the RPRA is now responsible for these processes |
| SWP Plan 3.2 | Admin | Join paragraphs in policy SEW-2-LB |
| SWP Plan 3.2.5 | Admin | Note that sewer mains in a wastewater collection system are significant threats in a WHPA area scoring 10 if they handle over 10,000 m ³ /day. |
| SWP Plan 3.3 | Admin | Significant Threat Circumstances: switch bullets #1 and 3. Clarify that 10-20kg of salt is a significant threat when exposed to precipitation in WHPA/IPZ as appropriate. Indoor storage of salt not considered a significant threat, but may be a medium or low threat based on quantity. |
| SWP Plan 3.3 | SALT-8-LB | Please clarify who the policy is directed at. Storage of less than 10kg of salt exposed to precipitation or runoff is not a SDWT – explain the prohibition of all quantities. Note that quantities from 100-300kg of salt partially exposed to |

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| | | precipitation or runoff is classified as a SDWT. Please explain the actions under this policy to address this quantity. |
| SWP Plan 3.5.1, 3.5.2 | Admin | For clarity on significant threat circumstances, please add "at least" when indicating the volume of liquid fuel classed as a SDWT. |
| SWP Plan 3.1, 3.10 | Handling, storage, and application of processed organic waste (POW) | Please clarify as to which section these belong and provide rationale. When is it "disposal of waste" as specified in section 3.1 or NASM application in section 3.10? |
| SWP Plan 3.13 | admin | insert a hyphen between "non legally" or change to "not" |
| SWP Plan 3.13 | PIPE-1-NLB | Specify if liquid hydrocarbon pipelines also exist in lower threat areas. A policy for pipeline regulatory agencies (TSSA, CER, OEB etc) to suggest they consider source protection in planning may also be useful - contacting pipeline regulators for future projects in MRCA may be useful. |