

Ministry of the Environment,
Conservation and Parks
Drinking Water and Environmental
Compliance Division
West Central Region
Niagara District Office

9th Floor, Suite 15
301 St. Paul Street
St. Catharines, ON L2R 7R4
Tel.: 905-704-3900
1-800-263-1035
Fax.: 905-704-4015

Ministère de l'Environnement
de la Protection de la nature et des
Parcs Division de la conformité en
matière d'eau potable et
d'environnement Direction régionale
du Centre-Ouest Bureau de district
de Niagara

9e étage, bureau 15
301, rue St. Paul
St. Catharines, ON L2R 7R4
Tel.: 905 704-3900
1-800-263-1035
Fax: 905 704-4015



December 6, 2024

Ryan Cook

Pelham, The Corporation Of The Town Of
20 Pelham Town Sq, Post Office Box Delivery ,400, Fonthill
Pelham, ON L0S 1E0

**Re: MECP Inspection – Pelham Distribution System, DWS# 260001604,
Planned Event # 1-375163036**

Dear Mr. Cook,

Enclosed is a copy of the inspection report prepared for the Pelham Distribution System under the Ministry's inspection protocol to assess compliance with Safe Drinking Water Act legislation. The report is based on conditions encountered at the time of the inspection, and subsequent follow-up.

If applicable, any items under the heading “Non-Compliance/Recommendations” are linked to the incidents of non-compliance with regulatory requirements contained in the Act, a regulation, or site-specific approvals, licenses, permits, orders or instructions. In addition, any recommendations that were made for your consideration.

Thank you for the assistance during the inspection. If you have any questions or concerns, do not hesitate to contact me or Elizabeth Chee Sing Water Compliance Supervisor, West Central Region at (519) 400-6731 or elizabeth.cheesing@ontario.ca

Lavandra Semple
Provincial Officer # 1503
MECP Niagara District Office
West Central Region
Lavandra.semple@ontario.ca

Cc:

Dave Vaccaro - Supervisor Of Water/Wastewater, Town of Pelham

Colin Horne - Niagara Public Health Department

Jason Wolf - Niagara Public Health Department

Inspect@niagararegion

Leilani Lee-Yates - Niagara Peninsula Conservation Authority

Thomas Proks- Niagara Peninsula Conservation Authority

Elizabeth Chee Sing – Water Compliance Supervisor, MECP



PELHAM DISTRIBUTION SYSTEM
Physical Address: 20 PELHAM TOWN SQ, ,
PELHAM, ON L0S 1E0

INSPECTION REPORT

System Number: 260001604
Entity: THE CORPORATION OF THE
TOWN OF PELHAM
Inspection Start Date: October 01, 2024
Inspection End Date: December 2, 2024
Inspected By: Lavandra Semple
Badge #: 1503
Inspected By: Elizabeth Chee Sing
Badge #: 1430



(signature)

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INTRODUCTION

Purpose

This announced, focused inspection was conducted to confirm compliance with Ministry of the Environment, Conservation and Parks' (MECP) legislation and conformance with ministry drinking water policies and guidelines.

Scope

The ministry utilizes a comprehensive, multi-barrier approach in the inspection of water systems that focuses on the source, treatment, and distribution components as well as management and the operation of the system. The inspection of the drinking water system included both the physical inspection of the component parts of the system listed in section 4 "Systems Components" of the report and the review of data and documents associated with the operation of the drinking water system during the review period. This drinking water system is subject to the legislative requirements of the Safe Drinking Water Act, 2002 (SDWA) and regulations made therein, including Ontario Regulation 170/03, "Drinking Water Systems" (O. Reg. 170/03). This inspection has been conducted pursuant to Section 81 of the SDWA. This inspection report does not suggest that all applicable legislation and regulations were evaluated. It remains the responsibility of the owner to ensure compliance with all applicable legislative and regulatory requirements.

Facility Contacts and Dates

The system serves an estimated population of 12,436 and is categorized as a Large Municipal Residential System Information reviewed for this inspection covered the time period of October 1, 2023 to September 30, 2024.

Systems/Components

The Town of Pelham Water Distribution System receives its supply of treated water from the Regional Municipality of Niagara's (Region) Welland Drinking Water System (DWS#260001604) via a 750 mm diameter watermain. Raw water for the Welland Water Treatment Plant is taken from Lake Erie via the Welland Recreational Waterway. Two drinking water storage facilities are located within the Town of Pelham: the Shoalts Drive Reservoir/Rechlorination Station and the Pelham Elevated Tank. The Welland Water Treatment Plant and the two storage facilities are subject to a separate inspection as they are owned and operated by the Regional Municipality of Niagara. The Town of Pelham owns and operates the water distribution system, which supplies drinking water to Fonthill and Fenwick urban areas in Pelham. The Pelham Water Distribution System supplies drinking water to approximately 12,546 people through approximately 84 kilometres of Town watermains ranging from 50 mm to 400 mm. The watermains are primarily cast iron, asbestos concrete, high pressure concrete piping, copper

and PVC piping. There are approximately 569 hydrants and 683 valves located throughout the system. The Town owns a fill station with side-fill and a backflow prevention device as well as a residential pressure boosting station. The Town of Pelham does not provide any additional treatment or rechlorination. The Town owns the Chestnut Ridge booster pump station which is located on the Pelham's Elevated Tank property. There is one fire pump on site which supplies a small part of the Town when needed.

Permissions/Approvals

This drinking water system was subject to specific conditions contained within the following permissions and/or approvals (please note this list is not exhaustive) at the time of inspection in addition to the requirements of the SDWA and its regulations: Drinking Water Works Permit (DWWP) Number 072-201 Issue Number: 5 and Municipal Drinking Water License (MDWL) 072-101 Issue 5 both approved June 17, 2024.

NON-COMPLIANCE

This should not be construed as a confirmation of full compliance with all potential applicable legal requirements. These inspection findings are limited to the components and/or activities that were assessed, and the legislative framework(s) that were applied. It remains the responsibility of the owner to ensure compliance with all applicable legislative and regulatory requirements.

If you have any questions related to this inspection, please contact the signed Provincial Officer.

RECOMMENDATIONS

This should not be construed as a confirmation of full conformance with all potential applicable BMPs. These inspection findings are limited to the components and/or activities that were assessed, and the legislative framework(s) that were applied. It remains the responsibility of the owner to ensure compliance with all applicable legislative and regulatory requirements.

If you have any questions related to this inspection, please contact the signed Provincial Officer.

INSPECTION DETAILS

This section includes all questions that were assessed during the inspection.

Ministry Program: DRINKING WATER | **Regulated Activity:** DW Municipal Residential

Question ID	DWMR1018001	Question Type	Legislative
Legislative Requirement(s): SDWA 31 (1);			
Question: Did the owner ensure that equipment was installed in accordance with Schedule A and Schedule C of the Drinking Water Works Permit?			
Compliance Response(s)/Corrective Action(s)/Observation(s): The owner ensured that equipment was installed as required. The Chestnut Ridge Pumping Station requires maintenance, however it is monitored by the Township of Welland.			

Question ID	DWMR1020001	Question Type	Legislative
Legislative Requirement(s): SDWA 31 (1);			
Question: Were Form 1 documents prepared as required?			
Compliance Response(s)/Corrective Action(s)/Observation(s): Form 1 documents were prepared as required. Eight Form 1s were provided. The Form 1s were commissioned and approved by the Township of Pelham and licensed engineers. The Forms 1s were created for the new watermain commissioning and replacements of existing watermains in Pelham. The Form 1s met the requirements outlined in the DWWP 072-201 Issue: 5.			

Question ID	DWMR1025001	Question Type	Legislative
Legislative Requirement(s): SDWA 31 (1);			
Question: Were all parts of the drinking water system that came in contact with drinking water disinfected in accordance with a procedure listed in Schedule B of the Drinking Water Works Permit?			
Compliance Response(s)/Corrective Action(s)/Observation(s): All parts of the drinking water system were disinfected as required.			

The new watermain commissioning forms met the requirements of the ministry's Watermain Disinfection Procedure, dated August 1, 2020.

Question ID	DWMR1033001	Question Type	Legislative
Legislative Requirement(s): SDWA O. Reg. 170/03 7-2 (3); SDWA O. Reg. 170/03 7-2 (4);			
Question: Was secondary disinfectant residual tested as required for the large municipal residential distribution system?			
Compliance Response(s)/Corrective Action(s)/Observation(s): Secondary disinfectant residual was tested as required. The Town of Pelham is required to take two sets of free chlorine residual (FCR) samples per week, as described in Schedule 7-2(4) of O. Reg. 170/03, at least four (4) samples taken on one day of the week, at least three (3) samples taken on a second day of the week, at least 48 hours apart.			

Question ID	DWMR1099001	Question Type	Information
Legislative Requirement(s): Not Applicable			
Question: Do records show that water provided by the drinking water system met the Ontario Drinking Water Quality Standards?			
Compliance Response(s)/Corrective Action(s)/Observation(s): Records showed that not all water sample results met the Ontario Drinking Water Quality Standards. AWQI#164025 (TC= 1 CFU/100ML on November 14, 2023) and related AWQI#164036 (TC = 200 CFU/100ML on November 15, 2023) had exceedances of Total Coliform.			

Question ID	DWMR1081001	Question Type	Legislative
Legislative Requirement(s): SDWA O. Reg. 170/03 10-2 (1); SDWA O. Reg. 170/03 10-2 (2); SDWA O. Reg. 170/03 10-2 (3);			
Question: Were distribution microbiological sampling requirements prescribed by Schedule 10-2 of O. Reg. 170/03 for large municipal residential systems met?			
Compliance Response(s)/Corrective Action(s)/Observation(s): Distribution microbiological sampling requirements were met.			

The Pelham Distribution System (DS) is required to take 20 microbiological samples per month, including at least 1 per week. In addition, at least 25% of these samples must also be tested for Heterotrophic Plate Count (HPC). All bacteriological samples were tested for HPC.

Question ID	DWMR1096001	Question Type	Legislative
Legislative Requirement(s): SDWA O. Reg. 170/03 6-3 (1);			
Question: Did records confirm that chlorine residual tests were conducted at the same time and location as microbiological samples?			
Compliance Response(s)/Corrective Action(s)/Observation(s): Records confirmed that chlorine residual tests were conducted as required.			

Question ID	DWMR1086001	Question Type	Legislative
Legislative Requirement(s): SDWA O. Reg. 170/03 13-6.1 (1); SDWA O. Reg. 170/03 13-6.1 (2); SDWA O. Reg. 170/03 13-6.1 (3); SDWA O. Reg. 170/03 13-6.1 (4); SDWA O. Reg. 170/03 13-6.1 (5); SDWA O. Reg. 170/03 13-6.1 (6);			
Question: Were haloacetic acid sampling requirements prescribed by Schedule 13-6 of O. Reg. 170/03 met?			
Compliance Response(s)/Corrective Action(s)/Observation(s): Haloacetic acid sampling requirements were met. The running annual average for 2023 is 9.344 ug/L. The frequency requirement was met. Haloacetic Acids (HAA) should be sampled on a quarterly basis during the calendar year. The drinking water standard is 80ug/L. HAA samples were taken in the Distribution System. The last sample was taken on September 10, 2024.			

Question ID	DWMR1087001	Question Type	Legislative
Legislative Requirement(s): SDWA O. Reg. 170/03 13-6 (1); SDWA O. Reg. 170/03 13-6 (2); SDWA O. Reg. 170/03 13-6 (3); SDWA O. Reg. 170/03 13-6 (4); SDWA O. Reg. 170/03 13-6 (5); SDWA O. Reg. 170/03 13-6 (6);			
Question: Were trihalomethane sampling requirements prescribed by Schedule 13-6 of O. Reg. 170/03 met?			
Compliance Response(s)/Corrective Action(s)/Observation(s): Trihalomethane sampling requirements were met.			

The running annual average for 2023 is 31.32 ug/L. Trihalomethanes (THM) are required to be sampled on a quarterly basis through the calendar year. In total, there may be 4 samples taken during the year. The required frequency was met. The samples were taken in the Distribution System. The drinking water standard is 100ug/L. The last sample taken, for THM, was on September 10, 2024.

Question ID	DWMR1104001	Question Type	Legislative
Legislative Requirement(s): SDWA O. Reg. 170/03 16-6 (1); SDWA O. Reg. 170/03 16-6 (2); SDWA O. Reg. 170/03 16-6 (3); SDWA O. Reg. 170/03 16-6 (3.1); SDWA O. Reg. 170/03 16-6 (3.2); SDWA O. Reg. 170/03 16-6 (4); SDWA O. Reg. 170/03 16-6 (5); SDWA O. Reg. 170/03 16-6 (6);			
Question: Were immediate verbal notification requirements for adverse water quality incidents met?			
Compliance Response(s)/Corrective Action(s)/Observation(s): Immediate verbal notification requirements for adverse water quality incidents were met.			

Question ID	DWMR1101001	Question Type	Legislative
Legislative Requirement(s): SDWA O. Reg. 170/03 17-1; SDWA O. Reg. 170/03 17-10 (1); SDWA O. Reg. 170/03 17-11; SDWA O. Reg. 170/03 17-12; SDWA O. Reg. 170/03 17-13; SDWA O. Reg. 170/03 17-14; SDWA O. Reg. 170/03 17-2; SDWA O. Reg. 170/03 17-3; SDWA O. Reg. 170/03 17-4; SDWA O. Reg. 170/03 17-5; SDWA O. Reg. 170/03 17-6; SDWA O. Reg. 170/03 17-9;			
Question: For large municipal residential systems, were corrective actions, including any steps directed by the Medical Officer of Health, taken to address adverse conditions?			
Compliance Response(s)/Corrective Action(s)/Observation(s): Corrective actions were taken to address adverse conditions.			

Question ID	DWMR1060001	Question Type	Legislative
Legislative Requirement(s): SDWA 31 (1);			
Question: Did the operations and maintenance manual(s) meet the requirements of the Municipal Drinking Water Licence?			

Compliance Response(s)/Corrective Action(s)/Observation(s):

The operations and maintenance manual(s) met the requirements of the Municipal Drinking Water Licence.

Question ID	DWMR1062001	Question Type	Legislative
Legislative Requirement(s): SDWA O. Reg. 170/03 7-5;			
Question: Did records or other record keeping mechanisms confirm that operational testing not performed by continuous monitoring equipment was done by a certified operator, water quality analyst, or person who met the requirements of Schedule 7-5 of O. Reg. 170/03?			
Compliance Response(s)/Corrective Action(s)/Observation(s): Records or other record keeping mechanisms confirmed that operational testing not performed by continuous monitoring equipment was done by a certified operator, water quality analyst, or person who met the requirements of Schedule 7-5 of O. Reg. 170/03.			

Question ID	DWMR1071001	Question Type	BMP
Legislative Requirement(s): Not Applicable			
Question: Did the owner provide security measures to protect components of the drinking water system?			
Compliance Response(s)/Corrective Action(s)/Observation(s): The owner provided security measures to protect components of the drinking water system. The Chestnut Ridge Booster Pump is located beside the Region of Niagara's "Pelham Elevated Tank" which is in a locked compound. The Region maintains the pump through a maintenance agreement. 2. The Town operates a Water Loading Station for Bulk Water Sales which is locked.			

Question ID	DWMR1073001	Question Type	Legislative
Legislative Requirement(s): SDWA O. Reg. 128/04 23 (1);			
Question: Was an overall responsible operator designated for all subsystems which comprise the drinking water system?			

Compliance Response(s)/Corrective Action(s)/Observation(s):

An overall responsible operator was designated for all subsystem.

Pelham DS is classified as a stand-alone Class 2 Distribution System which received Certificate #1733 on November 9, 2005. The designated ORO is Ryan Cook, who holds a valid Class 2 license, expiring March 31, 2026. Dave Vaccaro has been designated as the backup ORO, who holds a valid Class 2 license, expiring January 31, 2026.

Question ID	DWMR1074001	Question Type	Legislative
Legislative Requirement(s): SDWA O. Reg. 128/04 25 (1);			
Question: Were operators-in-charge designated for all subsystems which comprise the drinking water system?			
Compliance Response(s)/Corrective Action(s)/Observation(s): Operators-in-charge were designated for all subsystems.			

Question ID	DWMR1075001	Question Type	Legislative
Legislative Requirement(s): SDWA O. Reg. 128/04 22;			
Question: Were all operators certified as required?			
Compliance Response(s)/Corrective Action(s)/Observation(s): All operators were certified as required.			

Appendix A

Stakeholder Appendix

Key Reference and Guidance Material for Municipal Residential Drinking Water Systems

Many useful materials are available to help you operate your drinking water system. Below is a list of key materials owners and operators of municipal residential drinking water systems frequently use.

To access these materials online click on their titles below or use your web browser to search for their titles. Contact the Ministry if you need assistance or have questions at 1-866-793-2588 or waterforms@ontario.ca.

For more information on Ontario's drinking water visit www.ontario.ca/page/drinking-water



Click on the publication below to access it

- [Drinking Water System Profile Information Form - 012-2149E](#)
- [Laboratory Services Notification Form – 012-2148E](#)
- [Adverse Test Result Notification Form – 012-4444E](#)
- [Taking Care of Your Drinking Water: A Guide for Members of Municipal Councils](#)
- [Procedure for Disinfection of Drinking Water in Ontario](#)
- [Strategies for Minimizing the Disinfection Products Trihalomethanes and Haloacetic Acids](#)
- [Filtration Processes Technical Bulletin](#)
- [Ultraviolet Disinfection Technical Bulletin](#)
- [Guide for Applying for Drinking Water Works Permit Amendments, & License Amendments](#)
- [Certification Guide for Operators and Water Quality Analysts](#)
- [Training Requirements for Drinking Water Operator](#)
- [Community Sampling and Testing for Lead: Standard and Reduced Sampling and Eligibility for Exemption](#)
- [Drinking Water System Contact List – 7128E01](#)
- [Ontario's Drinking Water Quality Management Standard - Pocket Guide](#)
- [2020 Watermain Disinfection Procedure](#)
- [List of Licensed Laboratories](#)

Appendix B

Inspection Rating Record (IRR)

Ministry of the Environment, Conservation and Parks - Inspection Summary Rating Record (Reporting Year - 2024-25)

DWS Name: PELHAM DISTRIBUTION SYSTEM
DWS Number: 260001604
DWS Owner: THE CORPORATION OF THE TOWN OF PELHAM
Municipal Location: PELHAM
Regulation: O.REG. 170/03
DWS Category: DW Municipal Residential
Type of Inspection: Focused
Compliance Assessment Start Date: Oct-1-2024
Ministry Office: Niagara District Office

Maximum Risk Rating: 212

Inspection Module	Non Compliance Risk (X out of Y)
Certification and Training	0/28
Logbooks	0/14
Operations Manuals	0/14
Reporting & Corrective Actions	0/45
Treatment Processes	0/60
Water Quality Monitoring	0/51
Overall - Calculated	0/212

Inspection Risk Rating:	0.00%
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Final Inspection Rating:	100.00%
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Ministry of the Environment, Conservation and Parks - Detailed Inspection Rating Record (Reporting Year - 2024-25)

DWS Name:	PELHAM DISTRIBUTION SYSTEM
DWS Number:	260001604
DWS Owner Name:	THE CORPORATION OF THE TOWN OF PELHAM
Municipal Location:	PELHAM
Regulation:	O.REG. 170/03
DWS Category:	DW Municipal Residential
Type of Inspection:	Focused
Compliance Assessment Start Date:	Oct-1-2024
Ministry Office:	Niagara District Office

All legislative requirements were met. No detailed rating scores.

Maximum Question Rating: 212

Inspection Risk Rating:	0.00%
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FINAL INSPECTION RATING:	100.00%
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