



# SOUTH HURON DISTRIBUTION SYSTEM 82 NELSON ST, SOUTH HURON, ON, NOM 1S2

# **INSPECTION REPORT**

Entity: MUNICIPALITY OF SOUTH

HURON

Inspection Start Date: December 18, 2023
Inspection End Date: February 14, 2024

Inspected By: David Dominelli

Badge #: 1119

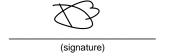
Inspected By: Marc Bechard

Badge #: 918

Ministry of the Environment, Conservation and Parks

Ministère de l'Environnement, de la Protection de la nature et des Parcs







# **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.

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# **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.

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# **INSPECTION DETAILS**

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

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

Question ID	DWMR1001000	Question Type	Information
Legislative Requirement(s): Not Applicable			
Question: What was the sco	ope of this inspection?		

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

The primary focus of this inspection is to confirm compliance with Ministry of the Environment, Conservation and Parks (MECP) legislation as well as evaluating conformance with ministry drinking water policies and guidelines during the inspection period. 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 practices.

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.

The South Huron Distribution System obtains its drinking water supply via 5 connections to the donor's system – the Lake Huron Primary Water Supply System (LHPWSS). The donor's water treatment plant is located within South Huron, as are over 40 km of trunk mains, a secondary reservoir and booster pumping station, and a number of chambers housing valves and other appurtenances. Note: The donor's infrastructure is subject to separate inspections.

The South Huron Distribution System supplies water to approximately 8,200 residents. Further, the system supplies some of Bluewater's residents along the Municipality's northern boundary. Some consumers along the Municipality's southern boundary are supplied by the North Middlesex Distribution System (which also obtains its drinking water from the LHPWSS).

The system consists of ~200 km of distribution watermains ranging in size from 50mm to 400mm diameter. The 50mm mains are polyethylene (PE); the 100mm to 300mm mains are polyvinylchloride (PVC) and the larger mains are mix of cast iron, ductile iron, and steel reinforced concrete pressure pipe.

There are several pressure zones within the South Huron Distribution System. (The Municipality's Annual Drinking Water Reports typically contain a detailed description of the

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zones, the connections between them, and the supply of zones during normal and emergency feed situations.)

The inspection consisted of a review of the following documents:

- Municipal Drinking Water Licence (MDWL): 054-101, Issue Number: 3;
- Drinking Water Works Permit (DWWP): 054-201, Issue Number: 4;
- South Huron Drinking Water System (DWS) Operation and Maintenance Manual;
- Operational logs, sample results, maintenance records, monitoring data, and other records related to the operation of the DWS for the period of January 1, 2023 to December 31, 2023.

The physical inspection of the DWS was conducted on January 3, 2024.

Question ID	DWMR1000000	Question Type	Information
Legislative Requirement(s): Not Applicable			
Question:			

Does this drinking water system provide primary disinfection?

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

This drinking water system provides for only secondary disinfection and distribution of water. Primary disinfection is undertaken by another regulated drinking water system which provides treated water to this drinking water system.

Question ID	DWMR1018000	Question Type	Legislative	
Legislative Requirement(s):				
SDWA   31   (1);				

#### Question:

Has the owner ensured that all equipment is 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 had ensured that all equipment was installed in accordance with Schedule A and Schedule C of the Drinking Water Works Permit.

Question ID	DWMR1020000	Question Type	Legislative	
Legislative Requirement(s):				
SDWA   31   (1);				

#### Question:

Is the owner/operating authority able to demonstrate that, when required during the inspection period, Form 1 documents were prepared in accordance with their Drinking Water Works

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#### Permit?

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

The owner/operating authority was in compliance with the requirement to prepare Form 1 documents as required by their Drinking Water Works Permit during the inspection period.

Question ID	DWMR1021000	Question Type	Legislative
Legislative Requirement(s):			

SDWA | 31 | (1);

#### Question:

Is the owner/operating authority able to demonstrate that, when required during the inspection period, Form 2 documents were prepared in accordance with their Drinking Water Works Permit?

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

The owner/operating authority was in compliance with the requirement to prepare Form 2 documents as required by their Drinking Water Works Permit during the inspection period.

Question ID	DWMR1114000	<b>Question Type</b>	Legislative
Legislative Requ	uirement(s):		

SDWA | 31 | (1);

#### Question:

Does the owner have evidence that, when required, all legal owners associated with the DWS were notified of the requirements of the Licence & Permit?

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

The owner had evidence that required notifications to all legal owners associated with the Drinking Water System had been made during the inspection period.

Question ID	DWMR1025000	Question Type	Legislative
Legislative Requ	uirement(s):		

SDWA | 31 | (1);

#### Question:

Were all parts of the drinking water system that came in contact with drinking water (added, modified, replaced or extended) 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 in accordance with a procedure listed in Schedule B of the Drinking Water Works Permit.

The operating authority has established standard operating procedures consistent with the

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ministry's Watermain Disinfection Procedure for watermain repair and commissioning as required by the drinking water works permit. The operating authority has also developed forms to document watermain repair and commissioning activities which include details of disinfection completed.

Question ID	DWMR1024000	Question Type	Legislative	
Legislative Requirement(s):				
SDWA   O. Reg. 170/03   1-2   (2);				

#### Question:

Do records confirm that the water treatment equipment which provides chlorination or chloramination for secondary disinfection purposes was operated as required?

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

Records confirmed that the water treatment equipment which provides chlorination or chloramination for secondary disinfection purposes was operated so that at all times and all locations in the distribution system the chlorine residual was never less than 0.05 mg/l free or 0.25 mg/l combined.

Note: This system is unique in that the Director has granted an exemption to meeting the minimum distribution system chlorine residual at specific addresses identified in Schedule D of the Licence provided that point of entry UV systems are used instead.

Question ID	DWMR1033000	<b>Question Type</b>	Legislative
Legislative Requirement(s):			

SDWA | O. Reg. 170/03 | 7-2 | (3); SDWA | O. Reg. 170/03 | 7-2 | (4);

# Question:

Is the secondary disinfectant residual measured as required for the large municipal residential distribution system?

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

The secondary disinfectant residual was measured as required for the large municipal residential distribution system.

Distribution system chlorine residual monitoring is conducted by means of several continuous analyzers at key points in the distribution system. Distribution system chlorine monitoring is also tested on grab samples when conducting sampling and routine distribution system maintenance.

Question ID	DWMR1035000	Question Type	Legislative	
<b>Legislative Requirement(s):</b> SDWA   O. Reg. 170/03   6-5   (1)1-4; SDWA   O. Reg. 170/03   6-5   (1)5-10;				
Question:				

Are operators examining continuous monitoring test results and are they examining the results within 72 hours of the test?

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

Operators were examining continuous monitoring test results and they were examining the results within 72 hours of the test.

Question ID	DWMR1038000	Question Type	Legislative
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# Legislative Requirement(s):

SDWA | O. Reg. 170/03 | 6-5 | (1)1-4;

#### Question:

Is continuous monitoring equipment that is being utilized to fulfill O. Reg. 170/03 requirements performing tests for the parameters with at least the minimum frequency specified in the Table in Schedule 6 of O. Reg. 170/03 and recording data with the prescribed format?

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

Continuous monitoring equipment that was being utilized to fulfill O. Reg. 170/03 requirements was performing tests for the parameters with at least the minimum frequency specified in the Table in Schedule 6 of O. Reg. 170/03 and recording data with the prescribed format.

Question ID	DWMR1037000	Question Type	Legislative
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#### Legislative Requirement(s):

SDWA | O. Reg. 170/03 | 6-5 | (1)1-4; SDWA | O. Reg. 170/03 | 6-5 | (1)5-10; SDWA | O. Reg. 170/03 | 6-5 | (1.1);

## Question:

Are all continuous monitoring equipment utilized for sampling and testing required by O. Reg. 170/03, or MDWL or DWWP or order, equipped with alarms or shut-off mechanisms that satisfy the standards described in Schedule 6?

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

All continuous monitoring equipment utilized for sampling and testing required by O. Reg. 170/03, or Municipal Drinking Water Licence or Drinking Water Works Permit or order, were equipped with alarms or shut-off mechanisms that satisfy the standards described in Schedule 6.

# **Legislative Requirement(s):**

SDWA | O. Reg. 170/03 | 6-5 | (1)1-4; SDWA | O. Reg. 170/03 | 6-5 | (1)5-10;

#### Question:

Are all continuous analysers calibrated, maintained, and operated, in accordance with the manufacturer's instructions or the regulation?

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

All continuous analysers were calibrated, maintained, and operated, in accordance with the

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manufacturer's instructions or the regulation.

Question ID	DWMR1108000	Question Type	Legislative
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# Legislative Requirement(s):

SDWA | O. Reg. 170/03 | 6-5 | (1)1-4; SDWA | O. Reg. 170/03 | 6-5 | (1)5-10; SDWA | O. Reg. 170/03 | 6-5 | (1.1);

#### Question:

Where continuous monitoring equipment used for the monitoring of free chlorine residual, total chlorine residual, combined chlorine residual or turbidity, required by O. Reg. 170/03, an Order, MDWL, or DWWP issued under Part V, SDWA, has triggered an alarm or an automatic shut-off, did a qualified person respond in a timely manner and take appropriate actions?

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

Where required continuous monitoring equipment used for the monitoring of chlorine residual and/or turbidity triggered an alarm or an automatic shut-off, a qualified person responded in a timely manner and took appropriate actions.

Question ID	DWMR1099000	Question Type	Information	
Legislative Requirement(s):				

Not Applicable

#### Question:

Do records show that all water sample results taken during the inspection review period did not exceed the values of tables 1, 2 and 3 of the Ontario Drinking Water Quality Standards (O. Reg. 169/03)?

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

Records did not show that all water sample results taken during the inspection review period did not exceed the values of tables 1, 2 and 3 of the Ontario Drinking Water Quality Standards (O. Reg. 169/03).

A microbiological sample collected on July 18, 2023 returned a result of 1 for Total Coliforms. Corrective actions were taken including inspection of a point of entry UV system at the location of the adverse result and re-sampling. There were no issues identified with the UV treatment unit and re-sample results were non-detect for E.coli and Total Coliforms.

<b>Question ID</b>	DWMR1081000	Question Type	Legislative	
Legislative Requirement(s):				

#### 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:

For LMR systems, are all microbiological water quality monitoring requirements for distribution samples being met?

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

All microbiological water quality monitoring requirements prescribed by legislation for distribution samples in a large municipal residential system were being met.

Schedule 10-2. (1) (a) of O. Reg 170/03 requires that the owner and the operating authority of a Large Municipal Residential System serving 100,000 people or less ensures at least 8 distribution system samples plus 1 for every 1000 people served are collected from the distribution system each month, with at least one of the samples being taken each week.

The sample are to be tested for E. Coli and total coliforms. Additionally, 25 percent of the samples are to be tested for general bacteria as a heterotrophic plate count.

A review of sampling records for the inspection review period showed the owner and operating authority meets the distribution system microbiological sampling requirements.

Question ID	DWMR1096000	<b>Question Type</b>	Legislative	
Legislative Requirement(s):				
SDWA   O. Reg. 170/03   6-3   (1);				

#### Question:

Do records confirm that chlorine residual tests are being conducted at the same time and at the same location that microbiological samples are obtained?

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

Records confirmed that chlorine residual tests were being conducted at the same time and at the same location that microbiological samples were obtained.

A review of sampling records confirmed that the chlorine residual is being taken at the same time and place of microbiological samples.

Question ID	DWMR1086000	Question Type	Legislative	
Legislative Requirement(s):				
SDWA LO Reg 170/03 L13-6 1 L(1): SDWA LO Reg 170/03 L13-6 1 L(2): SDWA LO Reg				

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:

Are all haloacetic acid water quality monitoring requirements prescribed by legislation conducted within the required frequency and at the required location?

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

All haloacetic acid water quality monitoring requirements prescribed by legislation were conducted within the required frequency and at the required location.

Schedule 13-6.1. requires that the owner and the operating authority of a drinking water system collect at least one sample in each calendar quarter from a point in the distribution system or plumbing that is likely to have elevated potential for the formation of haloacetic acids and test

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the sample for haloacetic acids.

A review of sampling records confirmed that the required sampling is being completed.

#### 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:

Have all trihalomethane water quality monitoring requirements prescribed by legislation been conducted within the required frequency and at the required location?

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

All trihalomethane water quality monitoring requirements prescribed by legislation were conducted within the required frequency and at the required location.

Schedule 13-6. requires that the owner and the operating authority of a drinking water system collect at least one sample in each calendar quarter from a point in the distribution system or plumbing that is likely to have elevated potential for the formation of trihalomethanes and test the sample for trihalomethanes.

A review of sampling records confirmed that the required samples are being collected.

<b>Question ID</b>	DWMR1101000	Question Type	Legislative
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# 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 LMR Systems, have corrective actions (as per Schedule 17 of O. Reg. 170/03) been taken to address adverse conditions, including any other steps as directed by the Medical Officer of Health?

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

Corrective actions (as per Schedule 17), including any other steps that were directed by the Medical Officer of Health, had been taken to address adverse conditions.

Corrective actions were taken including inspection of a point of entry UV system at the location of the adverse result and re-sampling. There were no issues identified with the UV treatment unit and re-sample results were non-detect for E.coli and Total Coliforms.

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	Question ID	DWMR1104000	Question Type	Legislative
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# 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 all required verbal notifications of adverse water quality incidents immediately provided as per O. Reg. 170/03 16-6?

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

All required notifications of adverse water quality incidents were immediately provided as per O. Reg. 170/03 16-6.

Question ID	DWMR1113000	<b>Question Type</b>	Legislative	
Legislative Requirement(s):				
SDWA   O. Reg. 170/03   10.1   (3);				

# Question:

Have all changes to the system registration information been provided to the Ministry within ten (10) days of the change?

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

All changes to the system registration information were provided within ten (10) days of the change.

Question ID	DWMR1059000	Question Type	Legislative	
Legislative Requirement(s):				
SDWA   O. Reg. 128/04   28;				

#### Question:

Do the operations and maintenance manuals contain plans, drawings and process descriptions sufficient for the safe and efficient operation of the system?

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

The operations and maintenance manuals contained plans, drawings and process descriptions sufficient for the safe and efficient operation of the system.

Question ID	DWMR1060000	Question Type	Legislative	
Legislative Requirement(s): SDWA   31   (1);				
Question:				

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Do the operations and maintenance manuals meet the requirements of the DWWP and MDWL issued under Part V of the SDWA?

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

The operations and maintenance manuals met the requirements of the Drinking Water Works Permit and Municipal Drinking Water Licence issued under Part V of the SDWA.

Question ID	DWMR1061000	Question Type	Legislative
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# Legislative Requirement(s):

SDWA | O. Reg. 128/04 | 27 | (1); SDWA | O. Reg. 128/04 | 27 | (2); SDWA | O. Reg. 128/04 | 27 | (3); SDWA | O. Reg. 128/04 | 27 | (4); SDWA | O. Reg. 128/04 | 27 | (5); SDWA | O. Reg. 128/04 | 27 | (6); SDWA | O. Reg. 128/04 | 27 | (7);

# Question:

Are logbooks properly maintained and contain the required information?

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

Logbooks were properly maintained and contained the required information.

Question ID	DWMR1062000	Question Type	Legislative
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# Legislative Requirement(s):

SDWA | O. Reg. 170/03 | 7-5;

#### Question:

Do records or other record keeping mechanisms confirm that operational testing not performed by continuous monitoring equipment is being done by a certified operator, water quality analyst, or person who meets the requirements of O. Reg. 170/03 7-5?

### 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 being done by a certified operator, water quality analyst, or person who suffices the requirements of O. Reg. 170/03 7-5.

Question ID	DWMR1071000	<b>Question Type</b>	BMP
Legislative Requirement(s): Not Applicable			
Not Applicable			

#### Question:

Has the owner provided security measures to protect components of the drinking water system?

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

The owner had provided security measures to protect components of the drinking water system.

Question ID	DWMR1073000	Question Type	Legislative
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# Legislative Requirement(s):

SDWA | O. Reg. 128/04 | 23 | (1);

#### Question:

Has the overall responsible operator been designated for all subsystems which comprise the drinking water system?

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

The overall responsible operator had been designated for each subsystem.

Question ID	DWMR1074000	<b>Question Type</b>	Legislative
Legislative Requirement(s):			
SDWA   O. Reg. 128/04   25   (1);			

## Question:

Have operators-in-charge been designated for all subsystems which comprise the drinking water system?

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

Operators-in-charge had been designated for all subsystems which comprise the drinking water system.

Question ID	DWMR1075000	<b>Question Type</b>	Legislative
Legislative Requirement(s): SDWA   O. Reg. 128/04   22;			
Question:			

Do all operators possess the required certification?

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

All operators possessed the required certification.

Question ID	DWMR1076000	<b>Question Type</b>	Legislative
Legislative Requirement(s):			
SDWA   O. Reg. 170/03   1-2   (2);			

#### Question:

Do only certified operators make adjustments to the treatment equipment?

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

Only certified operators made adjustments to the treatment equipment.

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#### Ministry of the Environment, Conservation and Parks - Inspection Summary Rating Record (Reporting Year - 2023-24)

**DWS Name:** SOUTH HURON DISTRIBUTION SYSTEM

**DWS Number:** 220001520

**DWS Owner:** MUNICIPALITY OF SOUTH HURON

**Municipal Location:** SOUTH HURON

**Regulation:** O.REG. 170/03

**DWS Category:** DW Municipal Residential

Type of Inspection: Focused
Inspection Date: Dec-18-2023
Ministry Office: Sarnia District Office

**Maximum Risk Rating: 368** 

Inspection Module	Non Compliance Risk (X out of Y)
Certification and Training	0/42
Logbooks	0/18
Operations Manuals	0/28
Reporting & Corrective Actions	0/74
Treatment Processes	0/155
Water Quality Monitoring	0/51
Overall - Calculated	0/368

Inspection Risk Rating: 0.00%

Final Inspection Rating: 100.00%

#### Ministry of the Environment, Conservation and Parks - Detailed Inspection Rating Record (Reporting Year - 2023-24)

**DWS Name:** SOUTH HURON DISTRIBUTION SYSTEM

**DWS Number:** 220001520

**DWS Owner Name:** MUNICIPALITY OF SOUTH HURON

Municipal Location: SOUTH HURON

**Regulation:** O.REG. 170/03

**DWS Category:** DW Municipal Residential

Type of Inspection: Focused
Inspection Date: Dec-18-2023
Ministry Office: Sarnia District Office

All legislative requirements were met. No detailed rating scores.

**Maximum Question Rating: 368** 

Inspection Risk Rating: 0.00%

FINAL INSPECTION RATING: 100.00%