

**SPP Explanatory Document Suggested Changes Review**

**Legend**

White Cells- original text

Grey cells-<sup>new</sup> text

     - area of original policy text to be changed (already reviewed by SPC)

     - area of new policy text (already reviewed by SPC)

     - area of original policy text to be changed (not yet reviewed by SPC)

     - area of new policy text (not yet reviewed by SPC)

**Table 10: Prescribed Instrument Policy additional rationale**

Threat	Policy Number	Threat Status	Rationale	Change
Discharge of Stormwater	2.07 (1640)	Existing	Discharge of stormwater is a significant threat under certain circumstances related to drainage area, land use and chemicals of concern. In addition to these consideration in the review and approval of prescribed instruments it is important to understand that snow melt water may contaminate stormwater where the storage of snow and road salt is a significant threat. These threats also need to be considered in the approvals and review process of Stormwater facilities. It is important to note that the areas and circumstances where these threats are significant may differ slightly from those areas where stormwater discharge is considered a significant threat.	
Stormwater Management	2.07 (1640) 2.08 (1641) OC-2.12 (3210) OC-2.13 (3211)	Existing and Future	<p>Discharge of stormwater is a significant threat under certain circumstances related to drainage area, land use and chemicals of concern. In addition to these consideration in the review and approval of prescribed instruments it is important to understand that snow melt water may contaminate stormwater where the storage of snow and road salt is a significant threat. These threats also need to be considered in the approvals and review process of Stormwater facilities. It is important to note that the areas and circumstances where these threats are significant may differ slightly from those areas where stormwater discharge is considered a significant threat.</p> <p>Although the Environmental Compliance Approval process is considered to be rigorous, prohibition of future activity through the ECA process was generally determined to be the most appropriate approach. The one exception to future prohibition through the ECA process is for ICA areas within the County of Oxford. For stormwater management facility discharge for a facility with a drainage area &lt;=100 ha and predominately rural, residential and/or agricultural land uses management through the ECA is used. Given that these facilities can be significant threats in an ICA for nitrates regardless of the drainage area of the facility and the ICAs in the County affect a substantially larger area and number of properties than the WHPA A &amp; B with a vulnerability score of 10, it was determined that it would be more reasonable to manage future occurrences of such threats through the ECA process. It should be noted that the areas affected by the ICAs for nitrates in the County are all predominately comprised of rural, residential and/or agricultural land uses, which is why the policy distinction for such facilities in an ICA only pertains to those land uses.</p> <p>Management through a review and, if necessary amendment of the ECA, was deemed most appropriate for existing stormwater management facilities.</p>	<p>Additional policy references added.</p> <p>New information added to address changes due to the inclusion of an ICA in Woodstock</p>

Threat	Policy Number	Threat Status	Rationale	Change
Sewage	2.09 (1642) 2.10 (1643) 2.11 (1745) 2.12 (1644) 2.13 (1746) 2.14 (1646) 2.19 (1650) 2.20 (1651) OC-2.07 (3205) OC-2.08 (3206) OC-2.09 (3207) OC-2.10 (3208) OC-2.11 (3209)	Existing and Future	<p>Although the Environmental Compliance Approval process is considered to be rigorous, prohibition of future activities through the ECA process was generally determined to be the most appropriate approach. The one exception to future prohibition through the ECA process is for sanitary sewers and pipes, which will be managed.</p> <p>For the most part, tools established under Part IV of the Clean Water Act do not apply to activities linked with the establishment, operation or maintenance of a system that collects, stores, transmits, treats or disposes of sewage. The SPC decided that to be consistent with the objective to ensure prescribed drinking water threats never becomes or ceases to be a significant threat, PI policies should be developed. To do this, the SPC felt that the available regulatory framework of Environmental Compliance Approvals (ECA) was appropriate. The Ministry of Environment has regulated sewage works with ECA since the early 1970s and this seemed an appropriate solution when it came to the sub-threats that have been prescribed under this threat category. The SPC decided that ECA should be amended with conditions that, when implemented, would prohibit the activity in vulnerable areas. The SPC decided that it did not want to outline specific conditions within these policies because it would hamper the flexibility of the issuer.</p> <p>Management through a review and, if necessary amendment of the ECA, was deemed most appropriate for existing activities.</p>	New section added
Fuel	2.41 (1671) 2.42 (1672)	Existing and Future	<p>Although activities of aggregate extraction at pits and quarries do not contribute chemicals or pathogens to drinking water sources, the Source Protection Committee (SPC) felt that the Aggregate Resources Act could be used to manage the storage of fuel in aggregate operations. To be consistent with the objective to ensure that prescribed drinking water threats never become or cease to be a significant threat, the SPC decided that a policy should be developed using Prescribed Instruments (PI). The SPC felt that the most appropriate use of the Aggregate Resources Act would be to put conditions on site plans that, when implemented, would locate fuel storage and handling outside of the area where it would be significant threat to drinking water. Where this is not feasible, the conditions shall manage the activity so that it would no longer be a significant threat.</p> <p>Back-up generators and other liquid powered devices for water works require fuel storage; however, the Source Protection Committee (SPC) felt that this situation was missing when considering Environmental Compliance Approvals (ECA) issued by the Province. The SPC decided to address this "gap" by developing a policy using Prescribed Instruments (PI). PI issued by the province through various ministries set out terms and conditions that are designed to protect the environment or human health. PI policies are intended to reduce the risk to municipal drinking water sources by managing those risks associated with an activity that has been identified as a drinking water threat in the associated Assessment Report. The SPC felt that this approach would be consistent with the objective to ensure that prescribed drinking water threats never become or cease to be a significant drinking water threat.</p>	New section added

Section / Policy	Page	Text	Reason For Change	Changes Made
4.2.8	47	<p>Local threats policies are based on local threats that have been approved by the Ministry of Environment. The transportation of fuel and fertilizer along provincial highways, county and local roads, railways, waterways, and the transportation of liquid petroleum products through pipelines have been identified as local threats in IPZ-1, 2 and 3 in the St. Clair Region Source Protection Area. The intent of Policies 2.53 and 2.54 associated with local threats is to manage the risks to drinking water sources through spills response. It is important that these programs build in existing consideration of the downstream use of the water sources for drinking by adding the knowledge of the Intake Protection Zones into spills preparedness, response and prevention programs. It is important to understand that risks to drinking water sources exist beyond the defined IPZ areas. The IPZ areas, especially IPZ-2, provide an indication of the level of risk and travel time to the intake under modelled conditions.</p> <p>Local threats have been only identified within the St. Clair Region Source Protection Area. Event-based modelling, which is used to determine these local threats, has only been completed for the IPZ-3 regions of LAWSS, Petrolia and Wallaceburg intakes. The event-based modelling has established these local threats as significant drinking water threats in the IPZ of the St. Clair Region Source Protection Area.</p>		
4.2.8	47	<p>Local threats policies are based on local threats that have been approved by the Ministry of Environment. The transportation of fuel along provincial highways, county and local roads, railways and waterways, have been identified as a local threat in Event Based Areas (EBA) in the St. Clair Region and Lower Thames Valley Source Protection Areas. The Transportation of fertilizer and the transportation of liquid petroleum products through pipelines have also been identified as local threats in the SCRSPA. The intent of Policies 2.53 and 2.54 associated with local threats is to manage the risks to drinking water sources through spills response. It is important that these programs build in existing consideration of the downstream use of the water sources for drinking by adding the knowledge of the Intake Protection Zones into spills preparedness, response and prevention programs. It is important to understand that risks to drinking water sources exist beyond the defined IPZ areas. The IPZ areas, especially IPZ-2, provide an indication of the level of risk and travel time to the intake under modelled conditions.</p> <p>Event-based modelling, was used to determine where spills from either these local threats or related prescribed drinking water threats may be considered a SDWT. The event-based modelling has established these local threats as significant drinking water threats in the Event Based Areas (EBA) of:</p> <ul style="list-style-type: none"> <li>• LAWSS, Petrolia, and Wallaceburg intakes in the St Clair Region Source Protection Area,</li> <li>• Wheatley intake in the Lower Thames Valley Source Protection Area, and</li> <li>• Stoney Point intake in the Essex Regions Source Protection Area.</li> </ul> <p>Event Based Areas are the areas within the Intake Protection Zones (parts of IPZ-1, IPZ-2, IPZ-3) where the event-based modelling has demonstrated that a spill can reach the intake at a concentration which would deteriorate the water for the purposes of drinking. The spills may be the result of the local threat activity (transportation) or it may be the result of a similar prescribed drinking water threat (storage or handling). Within the EBA these activities are identified as SDWT under the circumstance (volumes) modelled.</p>	IPZ-3s now being referred to as event based areas (EBAs)	<p>Change IPZ-3 reference to EBA</p> <p>Clarification on EBA areas</p>