

## **Summary of the Trent and Ganaraska Source Protection Plan Amendments - Public Consultation**

### **Introduction:**

Since January 1, 2015 the Trent and Ganaraska Source Protection Plans have been in effect to protect sources of municipal drinking water in the Trent Conservation Coalition Source Protection Region.



These plans contain policies for activities that have been determined to be significant drinking water threats (as determined by the Technical Rules under the *Clean Water Act, 2006*) in areas near municipal groundwater wells and surface water intakes. The Source Protection Committee is proposing some amendments to the Source Protection Plans to improve the effectiveness of some policies and to address changes that were made to the Technical Rules.

## Main Proposed Changes:

### Above Grade Fuel Tanks more than 250 L

Above grade fuel tanks more than 250 litres, near municipal wells may need a risk management plan. A risk management plan will require regular inspections of the tanks and infrastructure. It may also include measures to protect the tank from damage from outdoor elements.

A **risk management plan** regulates activities that pose a significant threat to municipal drinking water sources.

The risk management plan includes best management practices designed to ensure that risks to the municipal drinking water source are reduced or eliminated. The plan is generally negotiated between the person doing the activity and a risk management official.



### Above Grade Fuel Tanks more than 2,500 L

Large above grade fuel tanks near a municipal drinking water intake may need a risk management plan.



### **Fuel Handling and Storage: Anyone with an existing fuel risk management plan:**

The policies requiring risk management plans for fuel are being amended to include a requirement to inspect fuel infrastructure, not just the tanks. Infrastructure relates to the equipment and systems needed to produce, distribute, store, monitor and dispense fuel.

### **Agriculture**

**Pesticides:** In the original Source Protection Plan, policies requiring risk management plans and prohibition of pesticides were only applied to specific chemicals used as pesticide. The Technical Rules have changed so the policies are being amended. This will mean all pesticides in the most vulnerable areas will be prohibited when it is a new activity or require a risk management plan for existing activities.



**Fertilizer (minor):** The storage of fertilizer now applies to all fertilizers stored in any form.

**Non Agricultural Source Material (minor):** Definitions of significant threats were clarified in the Technical Rules so policies were amended to reflect the new rules.

**Definition of existing activities (minor):** The definition of an existing activity was corrected to include any farm activity that is part of the regular farm rotational activities and has occurred within the previous 10 years. This means that activities that are determined to be existing as part of the normal farm rotation, will not be prohibited.

## **Road Salt Storage**

The policies are being amended to require municipalities to establish and enforce standards for any road salt storage over 100 kilograms. This means that road salt must be stored, so that it is not exposed to precipitation or runoff and to prevent it from contaminating drinking water sources.



## **Road Salt Application**

The policies are being amended so that only parking lots with more than 50 parking spaces or greater than 1,500 square metres will require risk management plans.





## **Snow Storage**

A new policy is being proposed to require risk management plans for snow storage on commercial and industrial parking lots or yards larger than 50 parking spaces or 1,500 square metres.



## **Dense Non Aqueous Phase Liquids (minor)**

In the original Source Protection Plan, specific substances that were considered dense non-aqueous phase liquids required risk management plans for existing handling and storage and future activities were prohibited. The Technical Rules now provide a list of businesses that typically use dense non-aqueous phase liquids. The policies have not changed but risk management officials will be contacting businesses in vulnerable zones that are on the list to determine if a risk management plan is required for these substances. Small incidental amounts are exempt from the policies.

**Dense non-aqueous phase liquids** are chemicals that are denser than water. Even a small amount of these substances can cause a toxic level of contamination for human health and the environment.



### **Timing for Establishing Risk Management Plans (Minor)**

The timeframe for amending or establishing a risk management plan will be shortened from 5 years to 2 years. It was 5 years in the original plan because risk management officials were starting from scratch and had to address all existing threats. Now that those risk management plans are in place, a 2 year timeframe is more appropriate.

**For more information go to:**

<https://trentsourceprotection.on.ca/>

Or Phone: 613-391-3915 Ext 246

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Policy #	Explanation of Change	Reason for Change	Impact of Change
G-1(2)	Policy G-1(2) defines an existing significant drinking water threat. For agricultural activities, Policy G-1(2)b defines an existing activity as one that has been engaged in at some point within the 10 year period prior to the approval of the Trent Source Protection Plan. Policy text changed to: b) An agricultural activity that the Risk Management Official has been able to verify has being part of a regular farm rotation and has occurred at least once within the previous 10 years.	The previous 10-year period is a fixed time-period and the committee realized that this was not the intent of the policy. The intent was to recognize the rotation nature of agricultural activities and consider any agricultural activity taking place in the last ten years, as part of the regular farm rotation, to be an existing activity.	No Impact
G-1(3)	Policy Removed. With the assistance of some of the municipal representatives on the Committee who have planning experience, a recommendation was developed to remove G-1(3) and describe in more general terms what would define an existing threat by amending Policy G-1(2).	In the approved Section 36 Workplan, the Committee identified that Policy G-1(3) was redundant. The Committee also was concerned that by trying to list all circumstances to consider in determining if a proposed activity would be existing, could create confusion and the possibility that something could be missed.	No significant impact.
G-5	Added “r) Conveyance of a Liquid hydrocarbon by a pipeline” under the list of applicable activities	Liquid hydrocarbon pipelines were added as a significant drinking water threat under the new Technical Rules	New hydrocarbon pipeline policies (HP) were added to the plan, see the HP section for more information.
G-6(3)	Text was added to afford the municipalities flexibility to determine the most feasible location for Source Protection Road Signs: “Municipalities shall determine the location of	The Section 36 Work Plan had identified that Policy G-6(3) did not allow any flexibility that would let the municipalities to determine the most feasible location for road signs.	No significant impact.

	<p>the signs. Where feasible, the signs will be placed, at a minimum, where municipally maintained roads are located within wellhead protection areas with a vulnerability score of 10 and/or intake protection zones or a wellhead protection area E with a vulnerability score of 8 or higher.”</p>	<p>The Committee approved adding to the policy text, wording that would afford the municipalities flexibility to determine the most feasible location for the road signs.</p>	
G-6(6)	<p>A new sub-policy stating: “Pipeline owners should post sufficient and visibly noticeable liquid hydrocarbon pipeline identification signage for pipelines located in wellhead or intake protection areas. In addition, ‘do not anchor’ signs should be posted when there is a submerged pipeline in the area of a navigable waterway.” Policy G-6(7) was added as a monitoring policy for G-6(6).</p>	<p>Policy G-6(6) was a new policy added, related to signage for hydrocarbon pipelines. The policy requests that owners of pipelines place sufficient signage in locations of pipelines in Wellhead Protection Areas and Intake Protection Zones. The committee also thought it would be advisable to have “Do Not Anchor” signs in locations that are navigable waterways where pipelines are located on the bed of the waterway.</p>	<p>There would be some cost related to creating, installing and maintaining these signs.</p>
G-7(2)	<p>The following was added to the list of activities that are not permitted where these activities would be a future significant drinking water threat, unless otherwise stated in the plan: “The establishment, operation or maintenance of a waste disposal site within the meaning of Part V of the Environmental Protection Act and the activity would not require a Prescribed Instrument.” A footnote was also added.</p>	<p>Policy G-7(2) is a Land Use Planning policy that lists activities that are subject to prohibition policies in the Source Protection Plan. The list should include waste disposal sites that are prohibited by Policy W-4(1) but are missing in the original plan. The Committee approved adding small quantities of waste to the list and also adding a footnote to the policy, listing which Prohibition Policies in the plan were related to Policy G-7(2).</p>	<p>This is simply a definition policy so there would be no economic impact.</p>
G-8	<p>After some consultation with some Risk Management Officials, the Committee approved changing Policy G-8(1) to read “If it is determined that an existing activity requires a risk management plan, the risk management plan must be established and complied with, within 2 years.”</p>	<p>The Section 36 Work Plan had identified that Policy G-8(1) had timelines for compliance that were not going to be met. The original policy required all necessary Risk Management Plans be established within 5 years of the approval of the Source Protection Plan. The MECP granted an extension to complete all necessary Risk</p>	<p>The changes to Policy G-8(1) and G-8(2) would not result in any significant economic impacts.</p>



	<p>The Committee also approved removing the existing Policy G-8(2) because it was originally written to prioritize the development of Risk Management Plans for existing activities when the Source Protection Plan first came into effect. It is no longer necessary. Policy G-8(2) was changed to read “A future activity that requires a risk management plan cannot proceed until a risk management plan has been established and provisions in the risk management plan are complete.”</p>	<p>Management Plans by the end of 2022. This extension solved the immediate problem. Then the Committee debated what would be a reasonable compliance time period moving forward. The 5-year period was reduced to 2 years now that the most of the existing threats have been managed. The Committee created the new Policy G-8(2) to address future activities that do not require a Building Permit or Planning application. This policy mimics the requirements of the Section 59 notification process.</p>	
G-11	<p>OT-1 Policies regarding Emergency Management Documents merged into G-11 in the Trent Source Protection Plan only.</p>	<p>The Section 36 Work Plan had identified that both Policy G-11 and OT-1 needed to be amended. Upon further review, the Committee decided that the two policies had similar intent. In order to simplify these policies, the Committee decided that for the Trent Source Protection Plan, the best approach would be to merge the OT-1 policies into the G-11 policies. The Ganaraska Source Protection Authority, through consultation with the Ganaraska Municipal Working Group, wanted to keep the status quo in terms of these two policies.</p>	<p>No significant impact.</p>
S-2	<p>Policy S-2(1) is a prescribed instrument policy that relies on the MECP to manage significant sewage threats by reviewing Prescribed Instruments to ensure adequate measures are in place to manage significant drinking water threats. Policy S-2(1) was amended to include a minimum requirement to ensure Prescribed Instruments that manage significant threats, contain a reference to applicable source protection vulnerable area and protocols for emergency responses related to protecting drinking water.</p>	<p>While the Committee understands that Prescribed Instruments have measures to protect the environment, there has not been enough detailed reporting to ensure that specific measures to protect drinking water sources are in place or have been added. This concern was raised because there have been examples of prescribed instruments that do not include adequate or correct measures.</p>	<p>More work may be required by MECP in relation to prescribed instruments.</p>

S-3	<p>The sewage threat sub-categories have been updated as a result of the 2021 technical rule changes. The threat subcategories were updated for all Sewage policies. Policy S-3 was modified slightly to address the low-risk systems that qualify for Consolidated Linear Infrastructure preauthorization. Policy (3b) was added as a monitoring policy for Consolidated Linear Infrastructure Approvals.</p>	<p>Policy S-3 is meant to prohibit future sewage facilities that would be high risk threats to drinking water.</p> <p>The Committee decided not to change Policies S-3(1) and S-3(2) except to add an exemption for future low-risk systems that would qualify for Consolidated Linear Infrastructure preauthorization.</p> <p>Additionally, the Committee felt that the Municipalities should report on terms and conditions in any Consolidated Linear Infrastructure Approvals for future systems. Policies S-3(3b) was added as a monitoring policy to provide this information.</p>	<p>Some work required by municipal staff to report on terms and conditions in any consolidated linear infrastructure approvals for future systems.</p>
S-6	<p>Policy S-6(1) originally required an emergency response plan within two years. Now that these plans are in place the Policy now requires a current emergency response plan. "Pumping stations" added to the policy text for S-6(1). Policy S-6(2) is a monitoring policy for S-6(1). The requirement that municipalities provide "a summary of terms and conditions in any Consolidated Linear Infrastructure Approvals that are protecting drinking water" was added to the list of what their annual report should entail.</p>	<p>The main issue with Policy S-6(1) is that the text of the policy should identify pumping stations as a component of the system that could fail and lead to a release of pathogens.</p> <p>Policy S-6(2) requires the municipalities to report annually a summary of the action taken to achieve the outcomes of the source protection plan policies. The Committee felt that this reporting should include a report of terms and conditions in any Consolidated Linear Infrastructure Approvals for existing systems that are brought into the approval.</p>	<p>Some work required by municipal staff to fulfill the requirements of the two amendments.</p>
S-8	<p>As a result of the new threat subcategories in the 2021 Technical Rules, some adjustments were necessary in Policy S-8. Policy S-8(1) became unnecessary because the Policy S-2 achieves the same outcome. The Committee approved removing Policy S-8(1). Slight text adjust for S-8(2) to remove a reference to developing a stormwater management program</p>	<p>The slight text adjustment to Policy S-8(2) is because the original text reflects actions to be taken when the Source Protection Plan was first approved for initial stages of implementation. The update aligns the policy with the current phase of ongoing implementation and does not change the intent of the policy. The Committee felt that this reporting should include a report of terms and conditions in any Consolidated Linear</p>	<p>No significant impact.</p>

	within 2-years. Reporting on Consolidated Linear Infrastructure Approval was also added.	Infrastructure Approvals for existing systems that are brought into the approval.	
Agriculture	The Committee approved adding to the pesticide preamble: "For practical reasons, pesticides applied or used in small quantities such as household use, are exempt from Policies A1 and A-4 and will instead be addressed through education and outreach."	It would not be practical to require risk management plans for small incidental quantities of household pesticides.	Minor impact to add to the education and outreach program.
A-2(3) & A-3	The following was added to the Prescribed Instrument agriculture policies: "At a minimum, the Prescribed Instrument shall include reference to the applicable source protection vulnerable area and where not already required, protocols for emergency responses related to protecting the drinking water source."	Policies A-2(3) and A-3 are prescribed instrument policies that relies on OMAFRA to manage significant sewage threats by reviewing Prescribed Instruments to ensure adequate measures are in place to manage significant drinking water threats. If there are not adequate measures, OMAFRA is required amend the Prescribed Instrument to include additional measures to protect drinking water sources. The OMAFRA is required to report annually on the action it has taken to achieve the outcomes of this policy. While the Committee understands that Prescribed Instruments have measures to protect the environment, there has not been enough detailed reporting to ensure that specific measures to protect drinking water sources are in place or have been added. The Committee felt that a minimum requirement would be to ensure Prescribed Instruments that manage significant threats contain a reference the applicable source protection vulnerable area and where not already required, protocols for emergency responses related to protecting drinking water. One of the problems at Walkerton was that the farmer didn't know the municipal well was right next to his agricultural property so identifying the vulnerable area the Prescribed Instrument is	Work required by OMAFRA to reference the applicable vulnerable areas and protocols for emergency responses related to source protection, if not already in Prescribed Instruments.

		in, is an easy ask for an important risk mitigative measure.	
A-4(1)	Text was added to A-4(1), stating “This prohibition does not apply to the application of pesticide when it is ordered by Health Units, the Ministry of Environment, Conservation and Parks or municipalities for health or environmental purposes.”	The committee decided that there could be situation when a future pesticide prohibition could be problematic if the pesticide use was for human health or environmental reasons, for example spraying for West Nile Virus. The Committee decided to add this exemption in Policy A-4(1).	No significant impact.
A-4(5)	The Committee approved adding a new Must Conform Specify Action Policy A-4(5) with the policy text: “Where small quantities of pesticide that would be existing or future significant drinking water threats, the Municipality shall develop and initiate an ongoing education and outreach program designed to raise the awareness of the impact of pesticide use on drinking water sources and best management practices to help reduce the negative impact.”	It would not be practical to require risk management plans for small incidental quantities of household pesticides so Education and Outreach would be a better approach.	Minor impact to add to the education and outreach program.
Fuel	Above Grade Fuel Tanks. The threat circumstances have changed in the technical rules so that above grade fuel tanks greater than 250L with a vulnerability score of 10 and greater than 2500L with a vulnerability score of 9 or higher will now be significant drinking water threats.	Fuel policies will apply to these above grade tanks.	For existing above grade tanks, risk management plans will be required. There may be some costs for the owners to comply with measures in the risk management plans. Future above grade tanks will be prohibited in these zones.
F-2(2)	Text was added to the fuel policy to include fuel tanks and “fuel infrastructure”, and that the frequency of inspection change from “no less than every 5 years” to “no greater than every 5 years”. The following definition of infrastructure was added to the policy preamble: “Infrastructure relates to the equipment and	The Committee also decided to add the requirement to inspect fuel infrastructure to coincide with the requirement to inspect fuel tanks. The Committee also corrected an error in the text describing the frequency of inspections.	Fuel tank owners may require more frequent inspections by a TSSA-certified technician. The cost of doing a thorough inspection would be justified if it saved the cost of a spill.

	systems needed to produce, distribute, store, monitor and dispense fuel.”		
Road Salt Policies	The pre-amble to the Road Salt Policies was updated to align with the new Technical Rules, including the description of when road salt application is a significant threat, and the parameters of when road salt storage is a threat.	As a result of the 2021 Technical Rule changes there is a potential for a substantial increase in the number of significant road salt application significant threats.	New Risk Management Plans may be required. There will be some cost to municipalities if they haven't already developed salt management plans.
R-1(3) to R-1(7)	New road salt sub-policies were added for municipalities, including preparing or updating salt management plans, developing education and outreach programs, monitoring sodium and chloride levels in water treatment plants, considering design criteria for parking lots and sidewalks, and a monitoring policy to report on the above.	The Committee consulted with staff including some Risk Management Officials to determine a more practical approach than negotiating a risk management plan for every significant threat, resulting in these proposed changes.	Potential work required for road staff and planners to implement and monitor the new policies. Some cost may be incurred for the increased education and outreach. Additional testing for sodium and chloride concentrations will be an additional cost.
R-5	The applicable activity was updated for road salt storage to include “in a quantity over 100 kg when exposed or potentially exposed to precipitation or runoff from precipitation or snowmelt”. The new policy requires the municipalities to set an enforce a standard for proper road salt storage. The text in R-5(1) was amended to reflect the above change, and a monitoring policy R-5(2) was also added.	As a result of the 2021 Technical Rule changes substantially smaller amounts of stored road salt will be considered significant threats, starting at 10 kilograms. Previously the minimum threshold for road salt storage 500 tonnes. The Committee had to consider the impact of such a drastic change. After much discussion and some consultation with the MECP it was decided that education and outreach in Policy R-6 would be appropriate for amounts of 10 kilograms up to 100 kilograms. For storage over 100 kilograms, municipalities will be required to set and enforce a standard for road salt storage to ensure proper storage of salt and to prevent it from getting into surface water or groundwater. This approach was deemed to a more practical approach than negotiating risk management plans for so many road salt storage activities.	Some work required by municipalities to set and enforce a standard for road salt storage.

R-6	<p>The applicable activity was updated to include road salt “over 10 kg when exposed to precipitation or runoff from”. R-6 was changed from a prohibition policy to a strategic action policy, and the implementer changed from RMO to Municipality. The policy text was updated to define the parameters of road salt storage for this policy to include “a quantity greater than 10 kg and exposed to precipitation or runoff from precipitation or snowmelt, or a quantity greater than 100 kg and potentially exposed to precipitation or runoff from precipitation or snowmelt” and for the municipality to “develop and initiate an ongoing education and outreach program designed to raise the awareness of the impact road salt has on drinking water sources and best management practices to help reduce the negative impact”</p>	<p>As mentioned in the previous section, the Committee decided that education and outreach was an appropriate policy tool to use for smaller amounts of exposed road salt (over 10 kilograms). It would not be reasonable to prohibit such small amounts of road salt.</p>	<p>Municipal staff will be required to develop a specific road salt storage education and outreach program.</p>
Waste Policies	<p>The pre-amble and threat summary table was updated.</p>		
W-1	<p>The MECP-implemented prescribed instrument policy was updated to include: “At a minimum, the Prescribed Instrument shall include reference to the applicable source protection vulnerable area and protocols for emergency responses related to protecting the drinking water source.”</p>	<p>Policy W-1 is a prescribed instrument policy that relies on the MECP to manage significant waste threats by reviewing Prescribed Instruments to ensure adequate measures are in place to manage significant drinking water threats. If there are not adequate measures, the MECP is required to amend the Prescribed Instrument to include additional measures to protect drinking water sources. The MECP is required to report annually on the action it has taken to achieve the outcomes of this policy. While the Committee understands that Prescribed Instruments have measures to protect the environment, there has not been enough detailed reporting to ensure that specific measures to protect drinking water</p>	<p>There will be some MECP staff time required to complete this review and update but this additional requirement is justified because it is important that the prescribed Instrument policy is effective in managing specific drinking water threats not just general environmental threats.</p>



		sources are in place or have been added. The Committee felt that a minimum requirement would be to ensure Prescribed Instruments that manage significant threats contain a reference the applicable source protection vulnerable area and protocols for emergency responses related to protecting drinking water.	
DNAPL and Organic Solvents	The pre-amble was updated to remove the list of circumstances that to be met that determine whether the activity is a significant drinking water threat. The update to the pre-amble also clarifies this applies to intake protection zones or wellhead protection area-E's with a vulnerability score of 9 or higher, and that for wellhead protection areas A-C, these are significant threats regardless of the grade at which handling or storage occurs.	The DNAPL Threat Summary section of the Source Protection Plan states "for practical reasons, DNAPLs present in very small quantities (e.g. Household cosmetics) were not considered significant drinking water threats." DNAPLs can likely be found in most homes and the committee originally decided that it would not be practical to have RMPs for these situations. It is a similar for businesses that use incidental amounts of DNAPLs.	No significant impact.
D-1 & D-2	The 'applicable activities' were updated to include the bolded text in the following: "The handling and storage of a dense non-aqueous phase liquid <b>for commercial or industrial use</b> and/or the handling and storage of an organic solvent is an existing significant drinking water threat"	Trent Source Protection Committee approved adding to Policy D-1 "for commercial or industrial use" in the Applicable Activities after "The handling and storage of a dense non-aqueous phase liquid" and "or small incidental quantities" after "e.g. household cosmetics" to clarify what is meant by very small quantities.  DNAPLs can be found in most homes and the committee decided that it would not be practical to have RMPs for these situations. However, the current policy text does not make that distinction. By Consensus the Trent Source Protection Committee approved adding for Policy D-1 "for commercial or industrial use" in the Applicable Activities after "The handling and storage of a dense non-aqueous phase liquid".	No significant impact.

Non-Agricultural Source Material (NASM) Policies	The Threat Summary section was updated to clarify the definition of NASM, and to add “processed organic waste” to the list of examples. “Biosolids” was also added to the ‘Application’ section.		
N-1(1)	The implementer (previously just OMAFRA) was updated to include MECP. The policy text was amended to include: “At a minimum, the Prescribed Instrument shall include reference to the applicable source protection vulnerable area and protocols for emergency responses related to protecting the drinking water source. “	Policy N-1 originally required OMAFRA to manage existing Category 2 and 3 NASM Threats with Prescribed Instruments. However, MECP does inspections and compliance reviews of some Category 2 and 3 NASM prescribed instruments, so they should be named in Policy N-1(1) as an implementer in Policy N-1 with some addition wording to explain their role.	Work required by MECP in relation to NASM prescribed instruments.
N-1(2)	Policy N-1(2) is a new prescribed instrument policy for OMAFRA, prohibiting the approval for prescribed instruments for NASM prohibited by policy N-2.	Policy N-1 did not address future threats presumably because our N-2 prohibits future Category 2 and 3 NASM. This means OMAFRA could approve a Prescribed Instrument for something that is prohibited by our N-2 Policy (IPZ or WHPA B). So the Committee decided to add a new N-1(2) instructing OMAFRA from not approving any Prescribed Instruments for future NASM that are prohibited by N-2.	No significant impact.
N-2	“except non-farm herbivorous manure” was added to the policy text for N-2.	Policy N-2 prohibits future NASM except for Category 1 NASM. However, manure from non-farm herbivorous animals is Category 1 NASM and should be prohibited. The Committee decided to rectify this situation by changing the policy text to “This policy does not apply for non-agricultural source material listed as Category 1 non-agricultural source material except for non-farm herbivorous manure as per the General Regulation (O. Reg. 267/03) made under the Nutrient Management Act, 2002.	No significant impact.

N-3	<p>The applicable activities were amended to reflect existing threats instead of future threats. The policy text was also amended to substitute non-“agricultural source material” with “herbivorous manure”</p>	<p>Policy N-3 is a Part IV policy that addresses existing Category 1 NASM. However, only manure from non-farm herbivorous animals is a significant threat, so the policy text was amended to reflect that it only applies to manure from non-farm herbivorous animals.</p>	<p>No significant impact.</p>
Snow Storage Policies	<p>Threat summary significantly updated to reflect new technical rules. The storage of snow is now a prescribed drinking water threat under the Clean Water Act, 2006 under two circumstances:</p> <ol style="list-style-type: none"> <li>1) A stormwater drainage system outfall that serves a Snow Disposal Facility.</li> <li>2) The infiltration or discharge of snowmelt from snow storage on a site where the predominant land use is commercial or industrial, by any means other than a stormwater drainage system outfall.</li> </ol> <p>The Applicable Activity section was also amended from just including “snow not stored along the side of a road or as a result of snow plowing”, to “where the snow storage is managed by an Environmental Compliance Approval or a Snow Dump not managed by an Environmental Compliance Approval and contains snow from mixed land uses including Commercial or Industrial”</p>	<p>The updates were made to reflect to the new technical rules. Originally Policy O-1 dealt with any snow storage areas in vulnerable areas where the snow storage would be a significant threat. As a result of the new technical rules, only snow from predominantly commercial or industrial areas or a storm water drainage system outfall that serves as a Snow Disposal Facility, can be considered significant threats. The Committee was concerned about “Snow Dumps” that are not managed by a prescribed instrument. After discussions with the MECP it was agreed that snow dumps could have snow brought from commercial and industrial areas and could therefore be considered a significant threat.</p>	
O-1(1)	<p>The policy text was updated to amend the word “activity” to “snow dump”, and to remove the reference to a time period.</p>	<p>The Committee realized that these limitations exclude a common occurrence in our region. Quite often snow is just moved to an area where</p>	<p>No significant impact.</p>

		<p>is out of the way and can melt. The Committee calls these locations “Snow Dumps”. These are sometimes located in vulnerable areas.</p> <p>The MECP was consulted on this gap and it was determined that because some of the snow being relocated will be from commercial or industrial areas that snow dumps could be significant drinking water threats under the new rules.</p> <p>Therefore, the Committee decided to keep the policies in Policy O-1 but make them specifically for snow dumps.</p>	
O-1(4) & O-1(5)	Two new prescribed instrument policies were added, with MECP as the implementer, for existing and future occurrences of the threat.	These policies were necessary to apply to any snow storage that is managed by a prescribed instrument.	Minor work required by MECP in relation to snow storage prescribed instruments.
O-3(1)	A new Risk Management Plan policy added for snow storage: “The activity is designated for the purpose of section 58 of the Clean Water Act, 2006 for commercial or industrial parking lots greater than 50 parking spaces or 1500 square meters. The risk management plan will be prepared in accordance with the general provisions given in policy G-8.”	A new policy for snow storage was added that will require risk management plans for existing or future significant drinking water threat, where the snow is stored in larger areas in which the predominant land use is Commercial or Industrial.	New Risk Management Plans may be required.
O-3(2)	The committee added a Specify Action Must Conform Policy O-3(2) with the following policy text: “Where the existing and future snow storage on commercial or industrial parking lots or properties is a significant drinking water threat, the Municipality shall develop and initiate an ongoing education and outreach program designed to raise the awareness of the impact snow storage has on drinking water sources and best management practices to help reduce the negative impact.”	This policy will specifically address snow storage threats for smaller commercial and industrial parking lots.	Minimal impact and this can be done in conjunction with the Road Salt Education and Outreach policy.

<p>Aquaculture Policies: Q-3 &amp; Q-4</p>	<p>A new strategic action policy, Q-3, was added for aquaculture, relating to the Stirling Issue Contributing Area, with MRNF as the implementer. The new policy aligns with Prohibition Policy Q-2, stating “MNRF shall not issue aquaculture permits in the Stirling Issues Contributing Area”. A monitoring policy (Q-4) was also added to related to Q-3 to ensure applications for aquaculture licences located in the Stirling Issues Contributing Area are being reported annually.</p>	<p>Policy Q-2 prohibits future aquaculture in the Stirling Issues Contributing Area. The Committee determined that a complementary policy (Q-3) should be added to the Source Protection Plan that would instruct the Ministry of Natural Resources and Forestry not to issue any permits or licenses for future aquaculture in the Stirling Issues Contributing Area to avoid the inadvertent approval of projects that are prohibited by the Source Protection Plan.</p> <p>The monitoring policy Q-4 was added to ensure applications for aquaculture licences located in the Stirling Issues Contributing Area are being reported annually.</p>	<p>MNRF will need to monitor the issuance of permits or licences in the Stirling Issues Contributing Area.</p>
<p>OT-2(2)</p>	<p>The Committee approved adding the words “or repaired” to Policy OT-2(2) after “decommissioned.” The new policy is to read: “3. Incorporate a condition of approval for the development application(s) that any wells on the subject property that are no longer in use or are substandard are decommissioned or repaired, In accordance with Ontario Regulation 903.”</p>	<p>There may be some circumstances where a well is still necessary so the option to repair was added.</p>	<p>Minimal impact.</p>
<p>Hydrocarbon Pipeline Policies</p>	<p>New Hydrocarbon Pipeline policies were added (HP-1 to HP-9) as a result of the Ministry of the Environment, Conservation and Parks (MECP) revising Ontario Regulation 287/07 in 2017 to include “The establishment and operation of a liquid hydrocarbon pipeline” as a prescribed drinking water threat.</p>	<p>As a result of the 2021 Technical Rule changes, the establishment and operation of hydrocarbon pipelines are now included as prescribed drinking water threats. The Committee had to develop a set of policies to address these significant threats, while also considering that the pipeline industry is already heavily regulated.</p>	<p>See below.</p>
<p>HP-1 to HP-5 (Trent Plan) L-2(1 to 5) Ganaraska Plan</p>	<p>HP-1 to HP-5 are new strategic action policies, with the owner of the pipeline as the implementer (including regulators and approval authorities for HP-3). HP-1: sets out requirements for environmental protection</p>	<p>In 2019, a Trent Conservation Coalition working group was established to consult with regulators and the pipeline companies. The regulators consulted with were the National Energy Board, the Ontario Energy Board and the Technical</p>	<p>More work required by the owners of the pipelines to meet the requirements of policies HP-1 to HP-5.</p>

	<p>programs, emergency management programs and emergency procedure manuals. HP-2: with regard to hydrocarbon pipelines crossing a body of open water this is considered a significant drinking water threat, the pipeline owner is to meet the current industry best practices . HP-3: that source protection authorities be included in the consultation process and be given the opportunity to provide feedback for new pipelines, changes to a pipeline or change in material being transported in a pipeline. HP-4: that the applicable source protection authority is advised of any abandonment or change of use of any pipelines. HP-5: that watercourses in the Lower Trent Source Protection Area, within IPZ 1, IPZ 2 and IPZ 3 with a score of 9 or 10 are to be considered when deciding on valve or equipment placement.</p>	<p>Standards and Safety Authority. Trans-Northern Pipeline Inc. and Enbridge Pipelines Inc. are the owners of the two pipelines in the area. After several meetings with the regulators and owners a draft set of policies were developed to take to the Committee. These policies do not duplicate existing regulations but addressed identified gaps related to protecting the sources of drinking water. The Committee reviewed the draft policies and made some minor suggestions to improve them prior to approving them. The polices focus mostly on emergency response related to the drinking water systems.</p>	
<p>HP-6 (Trent Plan) L-2(6) Ganaraska Plan</p>	<p>HP-6 is a new strategic action policy with Conservation Authorities as the implementer. This policy is to ensure that CAs are to provide the pipeline owners with information on watershed characteristics, flood warnings and statements and other local data for the purposes of source protection.</p>	<p>It is important to provide this information to the pipeline owners because pipelines cross watercourses where flooding and erosion could cause problem for the pipelines.</p>	<p>More work required by applicable Conservation Authorities (Lower Trent and Ganaraska) to communicate this information.</p>
<p>HP-7 (Trent Plan) L-2(7) Ganaraska Plan</p>	<p>HP-7 is a new strategic action policy with the hydrocarbon pipeline regulators as the implementer. It states that “drinking water threats are to be included in inspection programs where a liquid hydrocarbon pipeline or a potential release from a liquid hydrocarbon pipeline would be considered a significant drinking water threat.”</p>	<p>See HP-1 to HP-5 explanation.</p>	<p>Work required by the pipeline regulators to meet the requirements of the policy.</p>



<p>HP-8 (Trent Plan) L-2(8) Ganaraska Plan</p>	<p>HP-8 is a new monitoring policy for Lower Trent and Ganaraska Conservation Authorities to request and report on information from the owner of the pipeline, pertaining to the results of the integrity inspections and significant pipeline maintenance that occurred within vulnerable areas.</p>	<p>See HP-1 to HP-5 explanation.</p>	<p>More work required by applicable Conservation Authorities (Lower Trent and Ganaraska) to communicate this information.</p>
<p>HP-9(Trent Plan) L-2(9) Ganaraska Plan</p>	<p>New policy HP-9 is similar to HP-1 addressed above, however the applicable activities for this policy specifically address moderate and low threats, where HP-1 to HP-8 are for significant threats. This is the only moderate and low threat policy in the plan.</p>	<p>See HP-1 to HP-5 explanation.</p>	<p>More work required by the owners of the pipelines to meet the requirements of the policy.</p>

**2023 Trent Conservation Coalition Assessment Reports - Section 36 Amendments**

<b>Section</b>	<b>Reason</b>	<b>Change</b>
Table 1 in Intro	Outdated Threat #s	Updated Table – Threat Numbers
Table 2 in Intro	Outdated Threat #s	Updated Table – Threat Numbers
Throughout	Technical Rule 16.3e	“Location Monitoring Wells” to “Monitoring Locations”
Sec. 4.4.2.4.3 & Sec.5.4.2.4.3	Impervious % new mapping methodology	Explanation of methodology added
Section 4.4.3 and 5.4.1.2	Description of Conditions	Updated as per the new Technical Rules
Various sections	New prescribed threat - pipelines	Change 21 prescribed threats to 22
Sec. 5.3.2.28 Sec. 5.4.5	Technical Rules 139 & 141	Removal Millbrook as a condition
Table 4.4-1	Technical rules	Add 22 pipelines
Table 4.4-4	Outdated Threat #s	Update Table – Threat Numbers
Table 5.4-3	Outdated Threat #s	Update Table – Threat Numbers
Sec. 6.2.7	Technical Rule 8	Removal section – Vulnerability scores are no longer assigned for Significant Groundwater Recharge Areas.
Table 6.3.2	Technical Rule 8	Remove bottom two rows because they relate to vulnerability scores for Significant Groundwater Recharge Areas.
Throughout	Technical Rule 8	Vulnerability scores are no longer assigned for Significant Groundwater Recharge Areas.
Throughout	PHASE I Technical Rules	Change “septic system” to “onsite sewage system”
Throughout	Update the Name of the Ministry	“Ministry of the Environment and Climate Change” to “Ministry of the Environment, Conservation and Parks”
Throughout	Population	Numbers updated
Introduction	Committee members	Updated
Throughout	Improvements	Minor editorial changes
<b>Trent Assessment Report only</b>		
Sec. 5.3.4.1	Technical Rule	Description of the new category – WHPA-ICA for the Stirling Drinking Water System
Sec. 5.4.5	Technical Rules- Millbrook Condition	Addition of statement that a “condition” does not exist at Millbrook
<b>Ganaraska Assessment Report Only</b>		
Throughout	Technical Rules – Pipelines	Changed local threats for pipelines to prescribed threats.
Section 4.2	Cobourg IPZ-2	Updated because of increased development
Section 4.2.3	IPZ Vulnerability Assessment	Statement explaining that no changes were made to the vulnerability analysis of the Great Lakes Intakes.

Section 4.3.2.3	Correction	Removed “the most recent Ministry of the Environment and Climate Change”
Section 4.4.4	Updates related to modeling threats	Updates re: Pipelines, Marine Gas Storage and Disinfection Failure at a Wastewater Treatment Plant
Section 5.4.1.1	Correction	Removal of “The Technical Rules describes the requirements under which a Source Protection Committee can add activities to be considered locally as drinking water threats with the appropriate approval by the Director.”
Throughout	Update	Significant threat numbers in text.