

March 29, 2023

Attn: Mohammed Alsharqawi, Deputy Director of Public Works,
The Township of South Stormont
Re: 2022 DWQMS Management Review

Dear Mohammed,

This letter accompanies Caneau DWQMS form QMS SYS-F12, dated December 22, 2022. The form, as you know, is our record of completion of the annual Management Review process of Caneau's drinking water quality management system.

A number of documents and records were utilized as part of the review, including:

- 2021-2022 MECP compliance inspection reports for each drinking water system,
- 2022 SAI Global DWQMS audit report,
- 2022 list of consumer complaints, as provided by the Township,
- 2022 DWQMS Internal Audit Report,
- 2021 MECP Annual and Municipal Summary Reports for each drinking water system and the 2022 (in-process) versions of these reports,
- 2021 DWQMS Management Review (QMS SYS-F12), and
- 2022 records of emergency preparedness training and risk assessment reviews.

Should you desire to receive a copy of any of these items, please let me know. Otherwise, if you could forward the completed review within the Township according to your regular procedures, I would greatly appreciate it. As usual, if you or any other staff or members of council have questions or concerns, I encourage you to reach out.

Sincerely,
Caneau Water & Sewage Operations Inc.



Bill Bryce, President

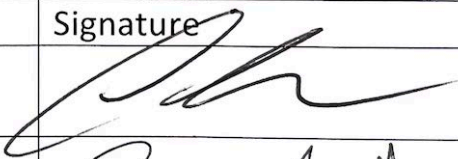
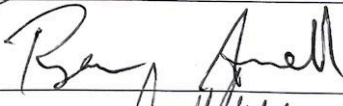
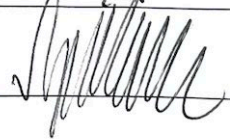
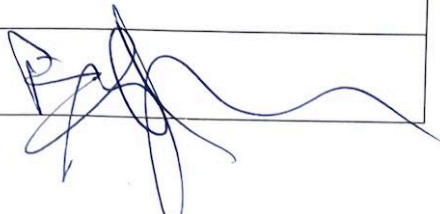
cc: Bailey McBride, Public Works Coordinator
Enclosures: Caneau QMS SYS-F12 and QMS SYS-F2, both dated December 22, 2022




Caneau Water & Sewage Operations Inc.
**Drinking Water Quality Management
System**

Document Title:	QMS General Communications Record
QMS Reference, Revision No. and Date:	QMS SYS-F2 v4 June 30, 2022
QMS Representative:	Taylor Eamon

QMS General Communications Record

Communications Event Title:	Date:
2022 QMS Management Review	December 22, 2022
	Duration: 2 hours
Presenter(s) or Facilitator(s): Bill Bryce, Taylor Eamon	General Audience: Top Management, QMS Rep, Senior Caneau Staff
Description of Material Covered: <ul style="list-style-type: none">• Annual QMS Management Review, covers the period since last review (Dec 2021).• Purpose is to review and assess the functioning of the quality management system.• Review, discuss and complete Management Review Checklist (QMS SYS-F12), including supporting records and documentation.• Generate conclusions and recommendations relating to the operation of the QMS and prepare communications for the Owner (Township of South Stormont).	
Record of Attendees:	
Name	Signature
Chris Eamon (ORO)	
Ryan Amell (Senior Operator)	
Taylor Eamon (QMS Rep)	
Andrew Pidgeon (Operator)	
Tyler Filion (Operator)	
Bill Bryce (President)	
Filed by:	

 Caneau Water & Sewage Operations Inc. Drinking Water Quality Management System	
Document Title:	QMS Management Review Checklist
QMS Reference, Revision No. and Date:	QMS SYS-F12 v3 September 20 th , 2022
QMS Representative:	Taylor Eamon

QMS Management Review Checklist

A copy of this checklist, once completed, is to be forwarded to the Owner, along with Management Review Action Item forms.

Management Review Participants Chris Eamon, ORO Ryan Amell, Senior Operator Taylor Eamon, Senior Operator/QMS Rep Bill Bryce, President	Date of Review December 22, 2022 Period Under Review December 2021-December 2022
Drinking Water Systems Included in this QMS Evaluation Long Sault-Ingleside Regional, Newington, St. Andrews/Rosedale Terrace	
Conclusions and Recommendations <i>(key messages about how the QMS is working)</i> <p>Caneau's QMS continues to function well and receives adequate resources for its maintenance. The quality management system improved in 2022 with a thorough review of all QMS documents undertaken by Caneau's new QMS Rep and Top Mgmt. The QMS continues to support Caneau's responsibilities to comply with drinking water regulation, provide high quality drinking water to consumers, and protect and preserve the drinking water infrastructure of the Township of South Stormont.</p> <p>The QMS was evaluated by SAI Global during an on-site re-accreditation audit that took place in September 2022. Through the process, Caneau was successful in retaining and renewing its QMS accreditation.</p> <p>MECP compliance inspections for 2021-2022 took place in December 2021 and continued via documents and records exchanges into Q1 2022. The final inspection reports were received in March 2022 and inspection ratings were 100% for each system, indicating continued comprehensive compliance with regulation.</p> <p>Communication between Caneau and the Township continues to be productive with monthly operations meetings taking place throughout 2022. Ad hoc communication continues to occur on a weekly basis between all levels of each organization to address operational, financial, and administrative issues as required.</p>	

Action Items (complete a QMS SYS-F8 form for each)

No action items identified.

Discussion Item	Notes, Comments
Period Under Review:	December 2021 – December 2022
a. Incidents of regulatory non-compliance	<p>The Newington Drinking Water System received a focused inspection from the Ministry of the Environment, Conservation and Parks on December 14, 2021. A final inspection rating of 100% was awarded and no incidents of regulatory non-compliance were identified.</p> <p>The Long Sault-Ingleside Regional Drinking Water System received a focused inspection from the Ministry of the Environment, Conservation and Parks on December 14, 2021. A final inspection rating of 100% was awarded.</p> <p>The inspector reported a single incident of regulatory non-compliance pertaining to the sampling of the WTP's pond. The pond does not contain treated water for consumption and is also not a source of raw water, but rather is a discharge body into which process water from the WTP is sent. Monthly pond sampling for TSS, pH and free chlorine residual are to be conducted, per the Municipal Drinking Water Licence, and the inspector determined that although samples had been collected during each calendar month of the inspection period, two successive samples had been collected too close together. The monthly samples must be collected at least 20 days and no more than 40 days apart, and two sample dates had only 17 days between them.</p> <p>The required corrective action was to provide the inspector with an action plan on how the operating authority would ensure that any sample taken in the future would meet the requirements of Subsection 6-1 of Schedule 6 to O. Reg. 170/03. This action plan was completed and provided to the inspector.</p>

Discussion Item	Notes, Comments
Period Under Review:	December 2021 – December 2022
	<p>The St. Andrews/Rosedale Terrace Drinking Water System received a special, announced inspection from the Ministry of the Environment, Conservation and Parks on December 10, 2021. A final inspection rating of 100% was awarded.</p> <p>The inspector reported a single incident of regulatory non-compliance pertaining to an overflow of water at the St. Andrews tower. Effectively, the inspector pointed out that an overflow of water on March 17, 2021, had discharged to the ditch from the tower during a period where a third-party contractor was conducting work at the booster station that impacted pump shut-off points and tower level alarms. Since the water discharge itself was not for maintenance and/or repair purposes, and the water had not been dechlorinated, the incident should have been considered a spill and should have been reported.</p> <p>The required corrective action was to provide the inspector with a written action plan for immediately reporting chlorinated overflows from the water tower as a spill. The action plan was provided and Caneau's QMS Adverse Water Quality and Spills Reporting Procedure (QMS OP-P11) was updated to include instructions for reporting tower overflows as spills.</p>
b. Incidents of adverse-water tests	<p>Long Sault-Ingleside:</p> <ol style="list-style-type: none"> 1. One adverse result (Sodium: 20.2 mg/L) recorded at LS WTP from samples taken November 21, 2022. Required reporting, resampling (November 24, 2022) and retesting was completed and the appropriate notice of Issue Resolution was provided by Caneau (November 29, 2022). <p>Newington: NONE</p>

Discussion Item	Notes, Comments
Period Under Review:	December 2021 – December 2022
	St. Andrews: <ol style="list-style-type: none"> One adverse result (1 TC) from samples taken at St. Andrews booster station on October 17, 2022. Required reporting, resampling (October 19, 2022) and retesting was completed and the notice of Issue Resolution was provided by Caneau (October 21, 2022).
c. Deviations from critical control point limits and response actions	None for any system.
d. The efficacy of the risk assessment process	Comprehensive risk assessment completed July 13, 2022, involving all operations personnel. Updates to risk assessment outcomes will be incorporated into QMS SYS OP-PLAN for re-endorsement in 2023. Risk assessment process is judged to be effective.
e. Internal and third-party audit results	<p>Internal audit conducted August 10, 2022. Seven non-conformances were identified, along with four additional opportunities for improvement. Audit process was updated this year with an effort to have more corrective action requests (CARs) generated in order to stimulate change and improvement. At the time of this report, only one CAR (CAR # 08.15.2022-3) was unresolved and it relates to updating process flow diagrams in Element 6 of the Operational Plan Manual. The process flow diagrams will be updated in 2023 and the Operational Plan Manual will be submitted to the Owner for re-endorsement.</p> <p>Caneau's third-party re-accreditation audit was conducted on-site by SAI Global on September 21, 2022. The report identified three minor non-conformances. Following an analysis and response by Caneau, the auditor found the corrective actions taken to have resolved the non-conformances and Caneau was</p>

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	recommended for continued registration as an accredited Operator.
f. Results of emergency response testing	2022 QMS Annual Emergency Management Review was conducted on October 13, 2022, with all operations staff. The team reviewed current versions of the QMS Emergency Management Procedure (QMS SYS-P10) and QMS Emergency Contact List (QMS SYS-T6), and also reviewed <i>priority users</i> , including their identification, location in QMS SYS-T6, and communication procedures during an emergency situation. Emergency situations identified in the risk assessment process were reviewed by the ORO.
g. Operational performance	<p>Long Sault – Zenon ultrafiltration membranes replaced in 2020 and 2021 continue to perform well, and are receiving monthly chlorine and acid cleans, as prescribed by the manufacturer.</p> <p>Newington – cartridge filter construction by the OEM appears to have changed over time and, consequently, filters are requiring more frequent replacement. That said, filtered water turbidity remains excellent and easily meets the performance criteria of the WTP’s licence.</p> <p>St. Andrews – beginning May 2022, average metered flows through St. Andrews booster have appeared to increase markedly. In addition, tower fill times have increased, and the amount of time needed to drain the tower has dropped notably. In short, it appears that there may be an as-yet unidentified consumer of water or leak that has not been located. Township and Caneau staff have discussed the issue multiple times and troubleshooting towards a solution continues.</p>

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Period Under Review:	December 2021 – December 2022
h. Raw water supply and drinking water quality trends	<p>Long Sault – no changes and no issues. Seasonal monitoring for surface water algae continues.</p> <p>Newington – no changes and no issues. Nitrates in Kraft Well continued to be monitored with monthly sampling.</p> <p>St. Andrews – as water is supplied by the City of Cornwall, the issue identified under “Operational Performance” is not significant enough (at present) to limit water available to consumers, nor does it put the Township near its contractual maximums with the City.</p>
i. Follow-up on action items from previous management reviews	There were no outstanding issues remaining from the 2021 Management Review.
j. The status of management action items identified between reviews	None identified.
k. Changes that could affect the QMS	<p>Operational and communications challenges presented by the Covid-19 Pandemic continued into 2022 but showed clear signs of easing toward the end of the period. Looking into 2023, more of a return to “business as usual” is forecast.</p> <p>The third-party auditor from SAI Global who had overseen Caneau’s QMS since its inception retired during the reporting period. As a result, there is expected to be an adjustment period as both parties gain familiarity with how the other works and views the QMS. Some changes to the QMS are likely to result. Additionally, Caneau was assigned a new MECP Inspector for Long Sault and Ingleside, both for water and wastewater. Some changes to the QMS may result as Caneau adjusts to the new inspector.</p>

Discussion Item	Notes, Comments
Period Under Review:	December 2021 – December 2022
l. Consumer feedback	<p>Five complaints were forwarded to Caneau throughout 2022: one each for pressure, high chlorine levels, water clarity, taste and odour, and health-related concerns. In each case, the consumer issue was resolved, and no treatment-related operational issues were determined to be the cause.</p> <p>Caneau and the Township coordinated to address consumer concerns through 2022 and all issues were closed within the year.</p>
m. The resources needed to maintain the QMS	Resources are adequate and Caneau is well supported by the Township.
n. The results of the infrastructure review	All essential capital items for 2022 were approved by the Township and started or completed during 2022. Completion of the work to integrate new chlorine panels at St. Andrews and Ingleside booster stations will take place early in 2023. The Township advises that the transition to a multi-year budgeting process based on its maturing asset management program will take place in stages, beginning in 2023.
o. Operational plan currency, content and updates	<p>Taylor Eamon became QMS Representative in 2022. As a result, a comprehensive review of all QMS documents was completed in advance of Caneau's 2022 3rd-Party Re-Accreditation Audit in September. Each QMS document was reviewed and updated beginning in May 2022.</p> <p>With a new QMS Representative and a new Township Council in place, the Operational Plan should be re-endorsed in 2023. Additionally, there are changes required to the process flow diagrams in Element 6, the risk assessment outcomes in Element 8 and role descriptions in Element 9 (Roles, Responsibilities and Authorities). These updates will be made prior to submission to the Township for re-endorsement.</p>

Discussion Item	Notes, Comments
Period Under Review:	December 2021 – December 2022
p. Staff suggestions	During the previous Management Review, Staff suggested that logs and ledgers be reviewed (for completeness, signatures, initials, dates, etc.) more frequently in order to facilitate compliance inspections. This took place in 2022 and will continue to be normal practice going forward.
q. Best management practices, including any published by the MOECC	<p>Caneau notes the following recommendations regarding best practices, as detailed in the MOE's drinking water inspection reports for each sub-system:</p> <p>Long Sault (2021-2022 Inspection Report dated March 11, 2022, based on December 14, 2021, inspection): No BMPs (Best Management Practices) identified.</p> <p>Newington (2021-2022 Inspection Report dated March 7, 2022, based on December 14, 2021, inspection): No BMPs (Best Management Practices) identified.</p> <p>St. Andrews (2021-2022 Inspection Report dated March 30, 2022, based on December 10, 2021, inspection):</p> <ol style="list-style-type: none"> 1. "It was noted in the St. Andrews Booster Ledger on several dates including February 12, 2021, February 18, 2021, February 27, 2021, and in March 2021 that operators wrote over the free chlorine residual values instead of crossing out the error and writing above or next to it. In addition, several entries were clearly not legible. Caneau's Procedure "Record Keeping & Reporting Requirements" – Log Book Section 27 O. Reg 128/04 states to correct errors a line should be drawn through the text and the correction made immediately after the error. It was advised that the St. Andrews Ledger is not a

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	<p>log book used to meet the regulatory record keeping requirements.</p> <p>RECOMMENDATION:</p> <p>It is recommended that when operators are correcting an error, that a line is drawn through the text/numbers and the correction is made next to the error, and that all entries are clearly legible.”</p> <p>2. “It was reported that alarms are not tested. It was reported that operators test the communication paging system alarm daily to verify that alarms are dialled out, and that this is recorded through the alarm company; and that there is redundancy built-in to the alarm system with programmed alarm set points and alarm communication system. It was also reported that the Owner receives a monthly report of call-ins.</p> <p>RECOMMENDATION:</p> <p>It is recommended that as a best practice the Operating Authority (Caneau) consider testing the low and high chlorine residual alarms on a routine basis and that a schedule and record of this testing is made.”</p>
r. QMS Corrective Actions (any CARs since last review)	Internal audit conducted August 10, 2022, and seven non-conformances were identified. Note: Audit process was updated this year with an effort to have more corrective action requests (CARs) generated in order to stimulate change and improvement. At the time of this report, only one CAR (CAR # 08.15.2022-3) was unresolved and it relates to updating process flow diagrams in Element 6 of the Operational Plan Manual.

Discussion Item	Notes, Comments
Period Under Review:	December 2021 – December 2022
	The process flow diagrams will be updated in 2023 and the Operational Plan Manual will be submitted to the Owner for re-endorsement.
s. QMS Preventative Actions (action taken on potential non-conformities or opportunities for improvement)	No preventative actions taken.
t. Other items (describe)	None.
Other Notes	