

# Audit Report

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Re-Accreditation Audit for

The Corporation of the County of Brant

1632463-02

Audited Address: 26 Park Avenue, Burford, Ontario, CAN, N0E 1A0

Start Date: Aug 11, 2022   End Date: Aug 12, 2022

Type of audit:  
Initial Verification Audit

Issue Date: August 15, 2022  
Revision Level: *Final*

### BACKGROUND INFORMATION

SAI Global conducted an audit of The Corporation of the County of Brant beginning on Aug 11, 2022 and ending on Aug 12, 2022 to DRINKING WATER QUALITY MANAGEMENT STANDARD VERSION 2 - 2017.

The purpose of this audit report is to summarise the degree of conformity with relevant criteria, as defined on the cover page of this report, based on the evidence obtained during the audit of your organization. This audit report considers your organization's policies, objectives, and continual improvement processes. Comments may include how suitable the objectives selected by your organization appear to be in regard to maintaining customer satisfaction levels and providing other benefits with respect to policy and other external and internal needs. We may also comment regarding the measurable progress you have made in reaching these targets for improvement.

SAI Global audits are carried out within the requirements of SAI Global procedures that also reflect the requirements and guidance provided in the international standards relating to audit practice such as ISO/IEC 17021-1, ISO 19011 and other normative criteria. SAI Global Auditors are assigned to audits according to industry, standard or technical competencies appropriate to the organization being audited. Details of such experience and competency are maintained in our records.

In addition to the information contained in this audit report, SAI Global maintains files for each client. These files contain details of organization size and personnel as well as evidence collected during preliminary and subsequent audit activities (Documentation Review and Scope) relevant to the application for initial and continuing certification of your organization.

Please take care to advise us of any change that may affect the application/certification or may assist us to keep your contact information up to date, as required by SAI Global Terms and Conditions.

This report has been prepared by SAI Global Limited (SAI Global) in respect of a Client's application for assessment by SAI Global. The purpose of the report is to comment upon evidence of the Client's conformity with the standards or other criteria specified. The content of this report applies only to matters, which were evident to SAI Global at the time of the audit, based on sampling of evidence provided and within the audit scope. SAI Global does not warrant or otherwise comment upon the suitability of the contents of the report or the certificate for any particular purpose or use. SAI Global accepts no liability whatsoever for consequences to, or actions taken by, third parties as a result of or in reliance upon information contained in this report or certificate.

Please note that this report is subject to independent review and approval. Should changes to the outcomes of this report be necessary as a result of the review, a revised report will be issued and will supersede this report.

<b>Standard:</b>	DRINKING WATER QUALITY MANAGEMENT STANDARD VERSION 2 - 2017	
<b>Scope of Certification:</b>	Drinking Water System	
<b>Drinking Water System Owner:</b>	County of Brant	
<b>Operating Authority:</b>	County of Brant Environmental Services	
<b>Owner:</b>	County of Brant	
<b>Population Services:</b>	19,743	
<b>Activities:</b>	<b>Treatment &amp; Distribution</b>	
<b>Drinking Water Systems</b>	Airport Drinking Water System 062-101	
	Cainsville Distribution System 062-102	
	Mt. Pleasant Drinking Water System 062-103	
	Paris Drinking Water System 062-105	
	St. George Drinking Water System 062-104	

<b>Total audit duration:</b>	<b>Person(s):</b> 1	<b>Day(s):</b> 1.50
<b>Audit Team Member(s):</b>	Team Leader	Brigitte Roth

**Other Participants:** No other participants.

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### Definitions and action required with respect to audit findings

#### Major Non-conformance:

Based on objective evidence, the absence of, or a significant failure to implement and/or maintain conformance to requirements of the applicable standard. Such issues may raise significant doubt as to the capability of the management system to achieve its intended outputs (i.e. the absence of or failure to implement a complete Management System clause of the standard); or

A situation which would on the basis of available objective evidence, raise significant doubt as to the capability of the Management System to achieve the stated policy and objectives of the customer.

NOTE: The "applicable Standard" is the Standard which SAI Global are issuing certification against, and may be a Product Standard, a management system Standard, a food safety Standard or another set of documented criteria.

Action required: This category of findings requires SAI Global to issue a formal NCR; to receive and approve client's proposed correction and corrective action plans; and formally verify the effective implementation of planned activities. Correction and corrective action plan should be submitted to SAI Global prior to commencement of follow-up activities as required. Follow-up action by SAI Global must 'close out' the NCR or reduce it to a lesser category **within 90 days for initial certification and within 60 days for surveillance or re-certification audits, from the last day of the audit.**

If significant risk issues (e.g. safety, environmental, food safety, product legality/quality, etc.) are detected during an audit these shall be reported immediately to the Client and more immediate or instant correction shall be requested. If this is not agreed and cannot be resolved to the satisfaction of SAI Global, immediate suspension shall be recommended.

In the case of initial certification, failure to close out NCR within the time limits means that the Certification Audit may be repeated.

If significant risk issues (e.g. safety, environmental, food safety, product legality/quality, etc.) are detected during an audit these shall be reported immediately to the Client and more immediate or instant correction shall be requested. If this is not agreed and cannot be resolved to the satisfaction of SAI Global, immediate suspension shall be recommended.

In the case of an already certified client, failure to close out NCR within the time limits means that suspension proceedings may be instituted by SAI Global.

Follow-up activities incur additional charges.

#### Minor Non-conformance:

Represents either a management system weakness or minor issue that could lead to a major nonconformance if not addressed. Each minor NC should be considered for potential improvement and to further investigate any system weaknesses for possible inclusion in the corrective action program

Action required: This category of findings requires SAI Global to issue a formal NCR; to receive and approve client's proposed correction and corrective action plans; and formally verify the effective implementation of planned activities at the next scheduled audit.

#### Opportunity for Improvement:

A documented statement, which may identify areas for improvement however shall not make specific recommendation(s).

Action required: Client may develop and implement solutions in order to add value to operations and management systems. SAI Global is not required to follow-up on this category of audit finding.

### Audit Type and Purpose

#### On-site Verification Audit:

An on-site audit to assess whether a QMS has been implemented for the subject system that meets the “DO” requirements of the DWQMS V2.

### Audit Objectives

The objective of the audit was to determine whether the drinking water Quality Management System (QMS) of the subject system conforms to the requirements of the Ontario Ministry of the Environment, Conservation and Parks' (MECP's) Drinking Water Quality Management Standard (DWQMS V2).

The audit was also intended to gather the information necessary for SAI Global to assess whether accreditation can continue to be offered to the operating authority.

### Audit Scope

The facilities and processes associated with the operating authority's QMS were objectively evaluated to obtain audit evidence and to determine a) whether the quality management activities and related results conform with DWQMS V2 requirements, and b) if they have been effectively implemented and/or maintained.

### Audit Criteria:

- The Drinking Water Quality Management Standard Version 2
- Current QMS manuals, procedures and records implemented by the Operating Authority
- SAI Global Accreditation Program Handbook

### Confidentiality and Documentation Requirements

The SAI Global stores their records and reports to ensure their preservation and confidentiality. Unless required by law, the SAI Global will not disclose audit records to a third party without prior written consent of the applicant. The only exception will be that the SAI Global will provide audit and corrective action reports to the Ontario Ministry of the Environment, Conservation and Parks (MECP). For more information, please refer to the SAI Global Accreditation Program Handbook.

As part of the SAI Global Terms, it is necessary for you to notify SAI Global of any changes to your Quality Management System that you believe are significant enough to risk non-conformity with DWQMS V2: For more information, please refer to the SAI Global Accreditation Program Handbook.

### Review of any changes

There have been no changes to the Operating Authority since the last audit.

## EXECUTIVE OVERVIEW

### Recommendation

Based on the results of this on-site verification audit, it has been determined that the management system is effectively implemented and maintained and meets the requirements of the standard relative to the scope of accreditation identified in this report; therefore, a recommendation for continued accreditation will be submitted to SAI Global review team.

### Opportunities for Improvement:

The following opportunities for improvement have been identified.

- **Element 3 / 11:** Opportunity to improve the scheduling of project work requiring water quality staff verifications (e.g. commissioning, disinfection, sampling activities) – relating to multi-departmental and multi-stakeholder projects, opportunity to review the allocation of tasks, roles and responsibilities (even on a temporary basis to cover the construction season). (Closing meeting notes: Planning to address this with the added water operators, allocation of shared responsibilities with training completed).
- **Element 10:** As the highest class of system potentially operated is Class III WD&S, consider confirming the annual hours of training required for all operators holding certification (as per O. Reg. 128/04).
- **Element 10:** Consider having South Operators cross-trained in the North system to develop experiences of all operators in all DWS's. (Closing meeting notes: Planning to begin implementation of this initiative in the new year).
- **Element 11:** Consider describing in OP s.11 the latest provisions and MECP requirements in the use of "emergency substitute operators" as per O. Reg. 128/04 and O. Reg. 129/04.

It is suggested that the opportunities for improvement be considered by management to further enhance the Operating Authority's Quality Management System and performance.

### Management System Documentation

The management system operational plan was reviewed and found to be in conformance with the requirements of the standard.

### Management Review

Records of the most recent management review meeting was verified and found to meet the requirements of the standard. All inputs were reflected in the record and appear suitably managed as reflected by resulting actions and decisions.

### Internal Audits

Internal audits are being conducted at planned intervals to ensure conformance to planned arrangements, the requirements of the standard and the established management system.

### Corrective, Preventive Action & Continual Improvement Processes

The Operating Authority is implementing an effective process for the continual improvement of the management system through the use of the quality policy, quality objectives, audit results, data analysis, the appropriate management of corrective and preventive actions and management review.

## Summary of Findings

1. Quality Management System	Conforms
2. Quality Management System Policy	Conforms
3. Commitment and Endorsement	OFI
4. Quality Management System Representative	Conforms
5. Document and Records Control	Conforms
6. Drinking-Water System	Conforms
7. Risk Assessment	Conforms***
8. Risk Assessment Outcomes	Conforms
9. Organizational Structure, Roles, Responsibilities and Authorities	Conforms
10. Competencies	OFI x 2
11. Personnel Coverage	OFI
12. Communications	Conforms
13. Essential Supplies and Services	Conforms
14. Review and Provision of Infrastructure	Conforms
15. Infrastructure Maintenance, Rehabilitation & Renewal	Conforms
16. Sampling, Testing and Monitoring	Conforms
17. Measurement & Recording Equipment Calibration and Maintenance	Conforms
18. Emergency Management	Conforms
19. Internal Audits	Conforms
20. Management Review	Conforms
21. Continual Improvement	Conforms
<b>Major NCR #</b>	Major non-conformity. The auditor has determined one of the following: (a) a required element of the DWQMS has not been incorporated into a QMS; (b) a systemic problem with a QMS is evidenced by two or more minor non-conformities; or (c) a minor non-conformity identified with a corrective action request has not been remedied.
<b>Minor NCR #</b>	Minor non-conformity. In the opinion of the auditor, part of a required element of the DWQMS has not been incorporated satisfactorily into a QMS.
OFI	Opportunity for improvement. Conforms to requirement, but there is an opportunity for improvement.
Conforms	Conforms to requirement.
NANC	Not applicable/Not Covered during this audit.
****	Additional comment added by auditor in the body of the report.

## PART D. Audit Observations, Findings and Comments

DWQMS Reference:	1 Quality Management System
Client Reference:	Interviews on August 11, 2022 with Kristina Hall, Water Quality Technician; David Stevenson, Water Technologist; Mike Biggin, Environmental Services Manager; Rob Walton, General Manager; Scott MacDonald, Lead Hand (re: Airport site tour); Jordan Corner, Water Operator (re: Bethel site tour); Sarah Dymont-Smith, Water Clerk.
<p>Details: <i>(personnel interviewed, procedures, activities and records observed)</i></p> <p>On-site interviews were conducted on August 11, 2022 (with staff as noted above) and further records review (based on interviews) continued the morning of August 12, 2022 – related records are noted throughout this checklist.</p>	

DWQMS Reference:	2 Quality Management System Policy
Client Reference:	Interviews with staff as noted in Element 1 section of this checklist.
<p>Details: <i>(personnel interviewed, procedures, activities and records observed)</i></p> <p>Dave – position make staff aware of the QMS, aware of provincial regulations and legislation, ensuring specific record-keeping is completed and retained. Ensuring water is safe and reliable. Ensuring QMS is continually improving. Monthly (except summer months) have online meetings will review regulatory requirements (e.g. O. Reg. 170/03, O. Reg. 128/04, Watermain disinfection procedure, Form 1's and 2's requirements) – confirm via e-mail as well.</p> <p>Kristina – internal audits conducted, update and create controlled forms used, review scheduling of regulatory tasks (e.g. sampling), Outlook used as a task management reminder / tracking program – confirmation e-mails from staff regarding samples sent to the labs. Copies of chains of custody are provided to Kristina to verify. Compare lab test results against expected samples / lab tests to verify completed as required and within limits.</p> <p>Mike - #1 – keep everyone tuned in to DWQMS requirements in their daily work, not forgetting about requirements, what needs to be done... Try to keep QMS and requirements top of mind – e.g. ensuring processes are in place, documentation is capturing processes, etc.</p> <p>Rob – Top Management (incl. Mike and Alex) – as GM, go-between operations and council – review all reports – quarterly QMS update, excellent communications tool. Training via WCWC re: Standard of Care – how communication between top management and council. A&amp;S reports, quarterly reports, annual meetings re: infrastructure reviews – requiring upgrading – July for 2022. Important to keep infrastructure / capital projects and upgrades of water systems and all other infrastructure. Very good lines of communication between owner, infrastructure depts, reporting done very well. Keep budgets, rate setting (2021 for four years – to mid-next council) – in line with Financial Plan, capital works, development charges – all aligned. Top management involved in all financial activities, reporting to council.</p> <p>Sarah – working within the DWQMS framework – tracking who's on-call, ORO, receiving paperwork (weekly flushing), second check for water samples, preparing for sending to the lab. Looking at free and total residuals – ensuring all mandatory fields are completed. If anything flagged or uncertain – go to Kristina with questions.</p>	

DWQMS Reference:	3 Commitment and Endorsement
Client Reference:	Interviews with staff as noted in Element 1 section of this checklist.
<p>Details: <i>(personnel interviewed, procedures, activities and records observed)</i></p> <p>Dave – in process of purchasing a software program for sampling and document management, slowly ramping up in staffing, CLI-ECA roll-out requires identifying owner for wastewater Form 1's and 2's related to infrastructure changes.</p>	



Kristina – Time, people for proactive and efficient – losing efficiency in additional tasks, risk for non-compliance and non-conformities with what's intended.

**OPI:** Opportunity to improve the scheduling of project work requiring water quality staff verifications (e.g. commissioning, disinfection, sampling activities) relating to multi-departmental and multi-stakeholder projects, opportunity to review the allocation of tasks, roles and responsibilities (even on a temporary basis to cover the construction season).

Mike – currently have adequate resources – just hired a few new staff members, need them trained – three extra operators, another technician planned to be hired with assigned responsibilities. Dave is key resource for QMS.

Rob – have adequate resources – new collective agreement negotiated with new language re: ORO coverage, very successful for the need in changes to have operators in the ORO role. In last year of term of council – asked for an expansion re: operational staff – to cover ORO, management structure changed, close to complete recruiting of new team members.

Sarah – have adequate resources with support by Kristina and Dave.

DWQMS Reference:	4 Quality Management System Representative
Client Reference:	Interviews with staff as noted in Element 1 section of this checklist.
<p>Details: <i>(personnel interviewed, procedures, activities and records observed)</i></p> <p>Dave – advise staff, ensure awareness of requirements of DWQMS, SOP's, monthly communications, e-mails – on quarterly basis, report to owners re: regulatory items updated within past quarter and summary of major milestones (e.g. audit reports' outcomes), work with Kristina to ensure the OP is up-to-date on the website.</p> <p>Kristina – back-up QMS Rep – when Dave is off or unavailable, and an immediate update to a form or procedure, questions about how to access information, time-sensitive attention to QMS issues.</p>	

DWQMS Reference:	5 Document and Record Control
Client Reference:	Interviews with staff as noted in Element 1 section of this checklist.
<p>Details: <i>(personnel interviewed, procedures, activities and records observed)</i></p> <p>Dave – any changes to SOP's, or from reviews of paperwork (re: missed information) – will review specific SOP's with staff.</p> <p>Mike – Meetings on monthly basis – with Dave (QMS), morning meetings with all staff (North and South groups) – multiple mornings weekly (one place 2 mornings / other place 3 and vice versa...). Interact with Lead Hand (Scott) regularly several times daily – relay messages required to staff. Expectations are outlined via paperwork, submitted through Mike, e.g. form completed – will return the form if incomplete or incorrect information – will complete it properly together. Dave also reviews for accuracy / full completion as required. Independent work / completing information – ensure all fully complete / accurate – accountability by team members expected.</p> <p>Rob – through leadership, attend meetings regularly (monthly) – with messages conveyed. Attend Committee and Council meetings and communicate re: consumer complaints / needs. Lawn watering vs. drought conditions – great communications. Top Management involved – e.g. rate structure – high rates for seniors, high use re: lawn watering (30% surcharge May – Sept. over 45 m<sup>3</sup> consumption) – planning to communicate with new council in winter. Drought conditions experienced since have been mitigated by these steps taken. Gaining control of consumption vs. drought conditions – well-understood and communicated.</p> <p>Sarah – another role, Water Division Clerk as well – service connections / disconnections. Good understanding of separate roles / responsibilities between clerical positions – daily / weekly interactions re: paperwork, through own position – may back-up for one another.</p>	



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DWQMS Reference:	6 Drinking Water System
Client Reference:	Site tours of Airport Water Treatment Facility and the Bethel Water Treatment Facility on August 11, 2022 Interviews with staff as noted in Element 1 section of this checklist.
<p>Details: <i>(personnel interviewed, procedures, activities and records observed)</i></p> <p>Details: <i>(personnel interviewed, procedures, activities and records observed)</i></p> <p>Visited Airport Water Treatment Facility and the Bethel Water Treatment Facility on August 11, 2022.</p> <p>Reviewed process steps from source water (wells) to POE. Noted equipment, process chemicals used with NSF labels, instrumentation in operation and verified calibration of devices on a 12-month basis (with more frequent verifications against handheld devices, i.e. colorimeters). Online analyzers are verified by staff on a daily basis, recorded in logbooks.</p>	

DWQMS Reference	7 Risk Assessment
Client Reference:	Interviews with staff as noted in Element 1 section of this checklist.
<p>Details: <i>(personnel interviewed, procedures, activities and records observed)</i></p> <p><b>Note</b> (noted during the systems / desktop audit): OP s.7 Risk Assessment – s.7.1.1 references the old MECP “Potential Hazardous Events...” file (<u>2017</u>) – it has since been updated through the Environmental Registry of Ontario in 2022.</p>	

DWQMS Reference:	8 Risk Assessment Outcomes
Client Reference:	Interviews with staff as noted in Element 1 section of this checklist. Risk Assessment Outcomes, dated April 13, 2022
<p>Details: <i>(personnel interviewed, procedures, activities and records observed)</i></p> <p>Dave – CCP's are SCADA setpoint-related for facilities, e.RIS – Paris, Cainsville, Mt. Pleasant, Airport, St. George – exceedances addressed and comments made for out-of-ordinary conditions (e.g. higher flow because of start-up, or bubble caused issue, chemical/UV-related actions taken). Track CCP's and limit exceedances – for distribution, chlorine residuals and pressure. Low / high chlorine in distribution system – e.g. AWQI in previous year, procedure re: flush until representative of system.</p> <p>Mike – CCP's, involved in setting limits – e.g. reservoir level, chlorine residual – instructed staff re: what to do in response to CCL's reached, what steps to take – discussed at QMS meetings regularly, everyone well-aware of limits and response actions. Any out-of-ordinary conditions experienced and perhaps inappropriate response actions taken, will address at next meetings.</p> <p>Rob – recently set-up in last budget cycle – ORO coverage – now on-call management 5-person rotation sharing on-call responsibilities – operators can contact a management person on-call re: unsure of out-of-ordinary situation – only started July 2022, management resource person to assist in making on-call decisions, can also help acquire resources.</p> <p>Viewed Risk Assessment Outcomes record, dated April 13, 2022 – noted the hazardous events identified by process step for each of the drinking water systems and available control measures and emergency procedures are noted for each. High risk threshold is over 21 and CCP's are identified for items that relate to disinfection (primary, secondary, residuals) and watermain breaks (loss of pressure, contamination of treated water).</p> <p>Noted consideration of cyber security threats in each of the risk assessments, and also noted that drinking water system changes are accounted-for (e.g. Airport was re-assessed based on upgrades implemented).</p>	

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DWQMS Reference:	9 Organizational Structure, Roles, Responsibility and Authorities
Client Reference:	Interviews with staff as noted in Element 1 section of this checklist.
<p>Details: <i>(personnel interviewed, procedures, activities and records observed)</i></p> <p>Dave – organizational structure is currently changing – Environmental Services Manager, ES Superintendent, water / wastewater operators (new job description to include both w/ww). Past two councils, WCWC course re: overall roles / responsibilities for council under standard of care – also OP presentation by QMS Rep and re-endorsement by top management and owner (Mayor).</p> <p>Mike / Dave – organizational changes are ongoing, Standard of Care presentation planned for council – communications with SMT re: council orientations. New staff responsibilities are conveyed on an ongoing basis and organizational changes are phased-in as staff are hired, and ORO duties are implemented among different team members – as they get up-to-speed on ORO duties and responsibilities. On-call coverage now includes management on-call to help answer staff questions in out-of-ordinary conditions while on-call.</p>	

DWQMS Reference:	10 Competencies
Client Reference:	Interviews with staff as noted in Element 1 section of this checklist. Wall of Operator Certificates during site visit on August 11, 2022 Summary of Staff Certification and Expiry details, dated June 23, 2022 Operator Certificate Renewal Application package prepared for James DeBlock's Certification, dated May 11, 2022 OWWCO's Operator Listing Report, <a href="https://owwco.ca/operator-listing-report/">https://owwco.ca/operator-listing-report/</a> , accessed on August 12, 2022
<p>Details: <i>(personnel interviewed, procedures, activities and records observed)</i></p> <p>Class III Distribution is the highest class of system potentially operated by staff. South system's highest class of system is Class III.</p> <p><b>OFI:</b> Consider having South Operators cross-trained in the North system to develop experiences of all operators in all DWS's.</p> <p>Mike – list of major tasks that an operator carries out – review with new operators, at 3-month and 6-month development reviews. At 6-months, in union, review the list – evaluating whether they can go on-call, review with colleagues, operator. Important tasks (e.g. UV alarm response) – will spend time with the operator prior to going on-call, for staff to demonstrate ability to carry-out appropriate responses. Three days planned for all new operators to review / train on – e.g. chlorine and fluoride safety – read / review / trained on PPE, review with Mike re: exactly about hazards, PPE required. Critical items – chlorine analyzers – review expectations, and station checks – what to check. Operators who have been here 3-4 years will also participate.</p> <p>Karen Vellenga tracks operator certifications and training hours (CEU's, OTJ's) – reviewed regularly, ensure staff have required hours. Will communicate with Mike – pandemic-related delays for training, under normal conditions, staff have the required hours. Certification renewals are addressed with enough lead time to allow the OWWCO review / approval of renewals.</p> <p>Sarah – One-on-one training with Dave, review DWQMS framework, how to process paperwork, extra set of eyes, ask questions of operators and Kristina / Dave – process and receive information. Filing of paperwork in TOMRMS structure.</p> <p><b>OFI</b> (noted during the systems / desktop audit): As the highest class of system potentially operated is Class III WD&amp;S, consider confirming the annual hours of training required for all operators holding certification (as per O. Reg. 128/04).</p> <p>Viewed the Wall of Operator Certificates during site visit on August 11, 2022. Reviewed the Summary of Staff Certification and Expiry details, dated June 23, 2022 and noted the next</p>	

expiring Operator Certificate is Jamie DeBlock's WD&S III (Cert #92288) on September 30, 2022. Reviewed the Operator Certificate Renewal Application package prepared for James DeBlock's Certification, dated May 11, 2022. Visited OWWCO's Operator Listing Report, <https://owwco.ca/operator-listing-report/>, accessed on August 12, 2022 and noted Jamie DeBlock's WD&S III (Cert #92288) has been renewed and now expires on September 30, 2025.

DWQMS Reference:	11 Personnel Coverage
Client Reference:	Interviews with staff as noted in Element 1 section of this checklist.
<p>Details: <i>(personnel interviewed, procedures, activities and records observed)</i></p> <p>Staff coverage should improve with more team members acting as ORO and additional operational staff. 9 operators, 4 new staff, 2 retirements anticipated in a short time. WQA coverage opportunity mentioned earlier (element 3).</p> <p>Mike – sufficient operators, contingency plans in place for pandemic response. ORO coverage during the pandemic (e.g. existing ORO had COVID – identified need for additional ORO resources available) – also now have a new superintendent and operators able to act as ORO. Could bring back retired operators as ORO / operator as required.</p> <p><b>OFI</b> (noted during the systems / desktop audit): Consider describing in OP s.11 the latest provisions and MECF requirements in the use of “emergency substitute operators” as per O. Reg. 128/04 and O. Reg. 129/04.</p>	

DWQMS Reference:	12 Communications
Client Reference:	<p>Interviews with staff as noted in Element 1 section of this checklist.</p> <p>Sample entries in customer concerns database</p> <p>DWQMS, H&amp;S Meeting Summaries, dated 2021-11-10, 2021-12-08, 2022-02-09</p> <p>RPT-22-93 Municipal Drinking Water Systems Regulatory and DWQMS Quarterly Update, dated April 19, 2022</p> <p>Notification to Third Parties – Regulatory Information and Quality Management System, dated January 21, 2021</p>
<p>Details: <i>(personnel interviewed, procedures, activities and records observed)</i></p> <p>Dave – With staff – monthly meetings, e-mails, with new operators – have a training session (will review DWQMS, SOP's, Watermain Disinfection, O. Reg. 170/03, O. Reg. 128/04, QMS-specific info – forms to be completed fully, accurately, legibly). With new admin staff (re: docs / records control, public communications). Public communications via bills and social media. Owner communications via quarterly reports, A&amp;S reports, discussed standard of care. Annual e-mail to essential suppliers – looking at assigning the task to admin (related to communications activities). Viewed DWQMS, H&amp;S Meeting Summaries, dated 2021-11-10, 2021-12-08, 2022-02-09 that provided excellent updates and status on various regular DWQMS-related and compliance-related activities along with evidence of continual improvement actions taken. Viewed sample report to owner: the quarterly report from April 19, 2022 that summarized the regulatory reporting requirements achieved in February and March 2022 (e.g. A&amp;S Reports, reporting high water users, OWRA / PTTW reporting, and MECF annual inspection outcomes.</p> <p>Mike / Rob – council communications – quarterly DWQMS reports, A&amp;S reports, other reports to council – e.g. staffing changes, expansion requests / approvals. Public – via council communications as well, via Communications team (social media, e.g. water efficiencies for drought conditions, rate changes). Essential suppliers – via Dave – annual communications, also on an ongoing basis with some suppliers.</p> <p>Contractor communications re: watermain breaks / valve replacements – operator on-site at all times ensuring requirements always met. Contractors communicated re: operational work only</p>	

done by operators. New subdivisions – pre-construction meetings, disinfection meetings (Mike Mandel re: QMS requirements), ensure roles / responsibilities are well-understood, etc. Plan submitted for review by Brant County team members – prior to approval.

Customer communications over social media re: watermain breaks, water service outages for any reason. Viewed document used to communicate legislative, MDWL, DWQMS requirements: Notification to Third Parties – Regulatory Information and Quality Management System, dated January 21, 2021

Sarah – consumer calls – some scripts prepared, would reach out to Kristina – responses logged into customer concerns database. Would follow-up on customer concerns completed by staff. When watermain break calls come in, will forward to Mike, other operators...

Viewed sample entries in customer concerns database with Sarah.

DWQMS Reference:	13 Essential Supplies and Services
Client Reference:	Interviews with staff as noted in Element 1 section of this checklist.
<p><b>Details:</b> <i>(personnel interviewed, procedures, activities and records observed)</i></p> <p>Verification of quality requirements – pipes, fittings – receive letter from suppliers re: supplies meet (except if exempt per DWWP), contractors working on watermain breaks or maintain analyzers (calibration records provided), chemical suppliers have NSF certification letters on their websites, labs are confirmed accredited. Action item list – develop supplier program specifically for contractors (who carry-out work on the DWS) – need to be aware of and follow all requirements of all regulations and MECP requirements. “Purchaser” role is planning to prepare standard agreements for specific activities (e.g. tenders for watermain-related work).</p> <p>Mike / Rob – Supply chain – haven’t seen issues, but have seen delays. Re: fuel supplier (new ownership of existing vendor, and back-up identified). Chemical supply has been good. Parts supplies have been delayed (e.g. valves) – related to projects, have ordered on behalf of contractors – have good stock of valves / hydrants on-hand (waiting to replenish). Spare PLC’s in stock. Have enough vehicles, well-maintained and have spare vehicle.</p>	

DWQMS Reference:	14 Review and Provision of Infrastructure
Client Reference:	Interviews with staff as noted in Element 1 section of this checklist.
<p><b>Details:</b> <i>(personnel interviewed, procedures, activities and records observed)</i></p> <p>Infrastructure Services / review meeting – representatives from other departments, other environmental services division – 5- and 10-year projects planned – discussed certain lifespan of watermains, how to plan for these replacements, balance with road infrastructure needs.</p> <p>Currently updating Asset Management Plan (AMP) – tool to help identify priorities of all assets. Infrastructure services – well-aware of opportunities with projects.</p>	

DWQMS Reference:	15 Infrastructure Maintenance, Rehabilitation and Renewal
Client Reference:	Interviews with staff as noted in Element 1 section of this checklist. Watermain Break Repair Report, dated March 16, 2022 (19 Spruce St, Paris); Hydrant Maintenance Record, dated May 20, 2022 (#2-081 at 46 Amelia); Infrastructure Repair Form, dated July 18, 2022 (101 Silver Street, Paris); Watermain Connection Report, dated July 25, 2022 (120 Court Drive, Paris); Service Connection Report, dated August 3, 2022 (8 Market Street, Paris).
<p><b>Details:</b> <i>(personnel interviewed, procedures, activities and records observed)</i></p> <p>Mike/Rob: WO program currently under consideration and for improving compliance</p>	

management. Longer-term large / major maintenance items – Kristina maintains a spreadsheet – reviewed annually. Part of budget plan – well maintenance and reservoir maintenance schedule incorporated. To identify needs in near-term. E.g. Mt. Pleasant – purchased spare high lift pump, since small one went down (if fire pump goes down, lack of redundancy) – have a spare available, can be installed within a couple of hours. Asset conditions considered. Redundancy / reliability measures considered. CityWide being implemented related to AMP with ESRI – considering integrations over the long run – with compliance tool to dovetail.

Viewed sample maintenance records: Watermain Break Reports dated March 16, 2022 (19 Spruce St, Paris); Hydrant Maintenance Record, dated May 20, 2022 (#2-081 at 46 Amelia); Infrastructure Repair Form, dated July 18, 2022 (101 Silver Street, Paris); Watermain Connection Report, dated July 25, 2022 (120 Court Drive, Paris); and Service Connection Report, dated August 3, 2022 (8 Market Street, Paris).

DWQMS Reference:	16 Sampling, Testing and Monitoring
Client Reference:	Interviews with staff as noted in Element 1 section of this checklist. Chemical Sampling Sheet reflecting regulatory and operational sampling requirements, accessed on August 11, 2022
<b>Details:</b> <i>(personnel interviewed, procedures, activities and records observed)</i> Reviewed the Chemical Sampling Sheet reflecting regulatory and operational sampling requirements by drinking water system, accessed on August 11, 2022 – tracking sample locations, bottles / preservative required, last sample dates, next sample dates and any notes.	

DWQMS Reference:	17 Measurement and Recording Equipment Calibration and Maintenance
Client Reference:	Site tours of Airport Water Treatment Facility and the Bethel Water Treatment Facility on August 11, 2022 Interviews with staff as noted in Element 1 section of this checklist.
<b>Details:</b> <i>(personnel interviewed, procedures, activities and records observed)</i> On site tours, confirmed measurement and recording equipment have calibration labels affixed (noted all “current” with next calibration due dates either January 2023, February 2023 or March 2023). Online analytical equipment without calibration stickers were noted at Bethel WTP but confirmed verified against handheld devices that are calibrated annually.	

DWQMS Reference:	18 Emergency Management
Client Reference:	Interviews with staff as noted in Element 1 section of this checklist. DWQMS, H&S Meeting Summary, dated 2021-12-08
<b>Details:</b> <i>(personnel interviewed, procedures, activities and records observed)</i> Reviewed the DWQMS / H&S Meeting Summary, dated 2021-12-08 that documents the Mock Emergency Scenario carried-out re: Watermain Break in a Condo Development and recorded immediate actions to be taken and opportunities (i.e. SOP for addressing watermain breaks in condo developments)	

DWQMS Reference:	19 Internal Audits
Client Reference:	Interviews with staff as noted in Element 1 section of this checklist.
<b>Details:</b> <i>(personnel interviewed, procedures, activities and records observed)</i>	



## Audit Report

This element was addressed in the systems audit report.

DWQMS Reference:	20 Management Review
Client Reference:	Interviews with staff as noted in Element 1 section of this checklist. Element 20 Management Review Action Item Tracking Sheet
<b>Details:</b> <i>(personnel interviewed, procedures, activities and records observed)</i> Reviewed Element 20 Management Review Action Item Tracking Sheet and noted most items from the 2021 Management Review have been completed with a few items underway.	

DWQMS Reference:	21 Continual Improvement
Client Reference:	Interviews with staff as noted in Element 1 section of this checklist. S2 Surveillance Audit report by SAI Global, dated Aug. 3, 2021
<b>Details:</b> <i>(personnel interviewed, procedures, activities and records observed)</i> Reviewed the status of S2 Surveillance Audit findings (in addition to the ones reviewed with status updates confirmed during the systems audit, <u>new updates are underlined</u> ): <ul style="list-style-type: none"><li>- <b>EI. 5 Records retention:</b> Consider listing Form 1's, 2's and 3's records in the retention table as they relate to documenting physical changes to the DWS and must be retained for 10 years (as per the DWWP sections 3.0, 4.0 and 5.0). <u>Confirmed Form 1's, 2's, 3's have 10-year retention times on the County's records retention list.</u></li><li>- <b>EI. 9 Owner responsibilities:</b> Consider including Owner's responsibilities as described under the SDWA sections 11-19. <u>Looking to expand on the description of owner responsibilities in s.9 of the OP prior to next council's re-endorsement.</u></li><li>- <b>EI. 16 Upstream sampling, testing, monitoring:</b> Consider describing City of Brantford's responsibility for sampling, testing and monitoring for process control and finished drinking water quality, as the upstream provider of water for the Cainsville Distribution System – and how water quality results are shared with the County on an ongoing basis (e.g. regarding AWQI's and annual / summary reports, etc.) <u>Ongoing.</u></li></ul> Sarah – having meetings to discuss opportunities for improvement, and follow-ups. Simple to follow-up afterwards. Suggestions have been made to improve processes.	

Details regarding the personnel interviewed and objective evidence reviewed are maintained on file at SAI Global.

This report was prepared by:  
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SAI Global Management Systems Auditor

The audit report is distributed as follows:

- SAI Global
- Operating Authority
- Owner
- MECP

## Notes

Copies of this report distributed outside the organization must include all pages.