Ontario

Ministry of the Environment, Conservation and Parks

Barrie District

1201-54 Cedar Pointe Drive
Barrie ON L4N 5R7
Tel: (705) 739-6441
1-800-890-8511
Fax: (705) 739-6440

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

District de Barrie

1201-54 chemin Cedar Pointe
Barrie ON L4N 5R7
Tél: (705) 739-6441
1-800-890-8511
Téléc: (705) 739-6440

July 24, 2026

Attention: Gayle Jackson - Township of Ramara CAO (GJackson@ramara.ca)

Re: Inspection of Bayshore Village Subdivision Drinking Water System at 143 Bayshore Drive in Ramara on May 14, 2026. Event Number 1-1601327067.

Attached to this letter is the report for the announced inspection completed at Bayshore Village Subdivision (DWS # 220012724) at 143 Bayshore Drive in Ramara on May 14, 2026, and the corresponding Incident Rating Report (IRR). This report provides an assessment of compliance and conformance based on observations and information available during the inspection review period only. This inspection report covers the period from November 5, 2025, to May 14, 2026.

Instances of non-compliance and/or non-conformance were not identified during the inspection. There are no further actions required on your part and the inspection can be considered closed.

The IRR is a summarized quantitative measure of the drinking water system's annual inspection and is published in the Ministry's Chief Drinking Water Inspector's Annual Report. The IRR can be found on pages 9 and 10 of the attached report.

Section 19 of the Safe Drinking Water Act (Standard of Care) creates a number of obligations for individuals who exercise decision-making authority over municipal drinking water systems. Please be aware that the Ministry has encouraged such individuals, particularly municipal councilors, to take steps to be better informed about the drinking water systems over which they have decision-making authority. These steps could include asking for a copy of this inspection report and a review of its findings. Further information about Section 19 can be found in "Taking Care of Your Drinking Water: A Guide for Members of Municipal Councils" found on the Drinking Water Ontario website at www.ontario.ca/drinkingwater.

If you have any questions or concerns, please contact me by email at laura.kent@ontario.ca or by telephone at (705) 712-0962.

Sincerely,

Laura Kent

Laura Kent
Water Compliance Officer
Badge No. 1123
Tel: (705) 712-0962
Email: laura.kent@ontario.ca

CC Laura Pye, Director of Infrastructure, Township of Ramara, lpye@ramara.ca
Dyana Marks, Compliance Manager, Township of Ramara, dmarks@ramara.ca
Stewart Hurd, Senior Operations Manager, OCWA, shurd@ocwa.com
Natalie Lamiot, Process & Compliance Technician, OCWA, nlamiot@ocwa.com
Cindy Coffin, Process & Compliance Technician, OCWA, ccoffin@ocwa.com
Medical Officer of Health, Simcoe Muskoka District Health Unit
Barrie District Office File, Ministry of the Environment, Conservation and Parks

BAYSHORE VILLAGE SUBDIVISION DRINKING WATER SYSTEM
Physical Address: 143 BAYSHORE DR,
RAMARA, ON L0K 1W0

INSPECTION REPORT

System Number:	220012724
Entity:	CORPORATION OF THE TOWNSHIP OF RAMARA
Inspection Start Date:	May 04, 2026
Site Inspection Date:	May 14, 2026
Inspection End Date:	July 14, 2026
Inspected By:	Laura Kent
Badge #:	1123

Laura Kent

(signature)

INTRODUCTION

Purpose

This announced, detailed inspection was conducted on May 14, 2026, to confirm compliance with Ministry of the Environment, Conservation and Parks' (MECP) legislation and conformance with Ministry drinking water policies and guidelines.

Scope

The Bayshore Village Subdivision Drinking Water System serves an estimated population of 993 people and 382 lots. The drinking water system is owned by the Corporation of the Township of Ramara and is operated by the Ontario Clean Water Agency (OCWA). The Bayshore Village Subdivision Drinking Water System (DWS) is categorized as a large municipal residential drinking water system, as defined by Ontario Regulation 170/03, and operates under DWS number 220012724.
The Bayshore Village Subdivision Drinking Water System consists of 3 wells (identified as Well 3, Well 4 and Well 5), treatment equipment, four sample stations, hydrants, distribution system continuous chlorine analyser and standby generator.
Treatment is provided by chlorination for primary and secondary disinfection, with each well having a separate chemical injection system complete with standby metering pump. A 112 m3 reservoir located below the treatment building provides storage and contact time for drinking water. Three variable frequency drive vertical turbine pumps, each pump with a capacity of 9.1 L/s, pump water from the reservoir to the distribution system. There are no storage structures within the distribution system. The distribution system consists of approximately 7,200 m of 150 mm diameter polyvinyl chloride watermain.

The Ministry utilizes a comprehensive, multi-barrier approach in the inspection of drinking water systems that focuses on the source, treatment, and distribution components as well as management and the operation of the system.

The inspection of the Bayshore Village Subdivision Drinking Water System included both the physical inspection of the component parts of the system and the review of data and documents associated with the operation of the drinking water system during the review period of November 5, 2025, to May 14, 2026, (hereafter referred to as the "inspection review period"). The previous inspection of the Bayshore Village Subdivision Drinking Water System was conducted on November 5, 2025.

This drinking water system is subject to the legislative requirements of the Safe Drinking Water Act, 2002 (SDWA) and regulations made therein, including Ontario Regulation 170/03, "Drinking Water Systems" (O. Reg. 170/03). This inspection has been conducted pursuant to Section 81 of the SDWA. This inspection report does not suggest that all applicable legislation and regulations were evaluated. It remains the responsibility of the owner to ensure compliance with

all applicable legislative and regulatory requirements.

Facility Contacts and Dates

The Bayshore Village Subdivision drinking water system is owned by the Township of Ramara and operated by the Ontario Clean Water Agency (OCWA). The system serves an estimated population of 993 people and is categorized as a Large Municipal Residential Drinking Water System under Ontario Regulation 170/03. Information reviewed for this inspection covered the period of November 5, 2025, to May 14, 2026.

Systems/Components

WELL #3

Well 3 is located 2 m east of the treatment building. The drilled well is 205 mm in diameter and 17 m deep. The well is sleeved with steel casing to a depth of 11.6 m. The Well ID Number is 4606334. The groundwater well was constructed in 1975 and is equipped with a submersible deep well pump capable of pumping 6.8 L/s.

WELL #4

Well 4 is located 60 m north of the treatment building and is located within a small golf course. The drilled well is 203 mm in diameter and 13.1 m deep. The well is sleeved with steel casing to a depth of 10 m. The Well ID Number is 4606332. The groundwater well was constructed in 1975 and is equipped with a submersible deep well pump rated at 28 L/s.

WELL #5

Well 5 is located 144 m north east of the treatment building and is located within a small golf course. The drilled well is 203 mm in diameter and 13.1 m deep. The well is sleeved with steel casing to a depth of 9.7 m. The Well ID Number is 4606333. The groundwater well was constructed in 1975 and is equipped with a submersible deep well pump rated at 8.3 L/s. In December 2025 rehabilitation work was completed on the well including high pressure air and water jetting and a camera inspection of the well interior.

PUMPHOUSE

Raw water from Wells 3, 4 and 5 enters the pumphouse through three separate raw water headers. Each raw water header is equipped with an ABB magnetic flow meter used for measuring raw water flows and a smoothbore raw water sample tap. The flow meters provide a 4-20 mA signal for recording the daily average flow rate, the total daily flow and the peak instantaneous flow rate taken from each well.

A pump control panel allows the operators to select the duty and stand-by wells. Each well can be run individually or with one another. Each well pump has an hour meter to log the number of hours it operates.
Three sodium hypochlorite chemical feed systems, one for each well, consist of a duty and stand-by chemical metering pump and one chemical solution tank with secondary containment. The chemical feed pumps alternate duty with each well pump start and perform automatic switch over in the event that the duty pump fails. If both chemical metering pumps fail the well pump stops and an alarm is sent to the operator. An alarm is also sent in the event that the duty chemical metering pump fails.
Chlorinated water discharges to the 112 m3 reservoir located below the treatment building where contact time is afforded. A stainless-steel flow dispersion header in the reservoir ensures the chlorinated water is fully mixed. A 1/3 HP air blower ventilates the reservoir.
Three 7.5 HP variable speed drive vertical turbine pumps move water from the reservoir to the distribution system. Each pump is rated at 9.1 L/s. The pump control panel allows the operators to select which high lift pump is duty and stand-by. Each high lift pump has an hour meter to log the number of hours it operates.
Prior to entering the distribution system, treated water passes through a flow meter. Treated water is fed to continuous chlorine, turbidity and pH analysers. The analysers are logged by the paperless chart recorder and have alarm set points to notify operators of any deviation from normal operating conditions.
An 80 kW diesel powered generator is located in the treatment building and is capable of supplying power during hydro supply power outages. The generator is adequately sized to power the entire water works.

DISTRIBUTION

The Bayshore Village Subdivision distribution system serves an estimated population of 993 people and 382 lots. Fire hydrants are installed throughout the distribution system for flushing purposes. There are four sample stations located in the distribution system. A continuous chlorine analyser is located within the Hayloft building which measures the free chlorine residual within the distribution system. Operators are able to view the continuous chlorine measurements remotely.

Permissions/Approvals

The Bayshore Village Subdivision Drinking Water System (DWS) was subject to specific conditions contained within the following permissions and/or approvals at the time of the inspection in addition to the requirements of the SDWA and its regulations:
- Municipal Drinking Water License 147-104 Issue Number 4, issued on February 4, 2022
- Drinking Water Works Permit 147-204 Issue Number 3, issued on February 4, 2022
- Permit To Take Water P-300-6300823231 effective January 18, 2025, expires December 31, 2034

Background and Compliance

No on-going or previous compliance issues associated with the Bayshore Village Subdivision Drinking Water System.

NON-COMPLIANCE

This should not be construed as a confirmation of full compliance with all potential applicable legal requirements. These inspection findings are limited to the components and/or activities that were assessed, and the legislative framework(s) that were applied. It remains the responsibility of the owner to ensure compliance with all applicable legislative and regulatory requirements.

If you have any questions related to this inspection, please contact the signed Provincial Officer.

RECOMMENDATIONS

This should not be construed as a confirmation of full conformance with all potential applicable BMPs. These inspection findings are limited to the components and/or activities that were assessed, and the legislative framework(s) that were applied. It remains the responsibility of the owner to ensure compliance with all applicable legislative and regulatory requirements.

If you have any questions related to this inspection, please contact the signed Provincial Officer.

Inspection Summary Rating Record (Reporting Year – 2026-2027)

DWS Name:	BAYSHORE VILLAGE SUBDIVISION DRINKING WATER SYSTEM
DWS Number:	220012724
DWS Owner:	RAMARA
Municipal Location:	RAMARA
Regulation:	O. Reg. 170 / 03
Category:	
Type of Inspection:	Detailed
Inspection Date:	Jul-14-2026
Ministry Office:	Barrie District Office

Maximum Question Rating: 331

Inspection Module	Non-Compliance Rating
Capacity Assessment	0/20
Certification and Training	0/41
Logbooks	0/28
Operations Manuals	0/14
Reporting & Corrective Actions	0/16
Source	0/16
Treatment Processes	0/106
Water Quality Monitoring	0/90
Overall - Calculated	**0/331**

Inspection Risk Rating:	**0.00%**
Final Inspection Rating:	**100.00%**

DWS Name:	BAYSHORE VILLAGE SUBDIVISION DRINKING WATER SYSTEM
DWS Number:	220012724
DWS Owner:	RAMARA
Municipal Location:	RAMARA
Regulation:	O. Reg. 170 / 03
Category:	
Type of Inspection:	Detailed
Inspection Date:	Jul-14-2026
Ministry Office:	Barrie District Office

Maximum Question Rating: 331

Inspection Risk Rating:	**0.00%**
Final Inspection Rating:	**100.00%**

INSPECTION DETAILS

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

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

Question ID	DWMR1007001	**Question Type**	Legislative

Legislative Requirement(s):
SDWA | O. Reg. 170/03 | 1-2 | (1)1;

Question:
Was the owner maintaining the production well(s) in a manner sufficient to prevent entry into the well of surface water and other foreign materials?

Compliance Response(s)/Corrective Action(s)/Observation(s):
The owner was maintaining the production well(s) in a manner sufficient to prevent entry into the well of surface water and other foreign materials.

Subsection 1-2. (1) 1. of Schedule 1 of Ontario Regulation 170/03 requires that the owner of a drinking water system shall ensure that any well that serves as an entry point of raw water supply is constructed and maintained to prevent surface water and other foreign materials from entering the well.
There are three supply wells for Bayshore Village Subdivision Drinking Water System. Each of the wells has a secure cap and screened vent. All production wells extend above grade and comply with the minimum height requirements set out in Ontario Regulation 903. The surrounding land slopes away from the well exteriors, and there is no indication of water ponding in the area.
During the inspection review period Operators performed monthly inspections of all wells. Raw water samples were collected from each of the wells each week during the inspection review period. All sample results were zero for total coliform and Escherichia coli with the exception of seven sample results for Well 5 and one for Well 4. The results that were not zero for Well 5 were a result of 1 for Escherichia coli and total coliform results ranging from one to 38. Well 4 had one result other than zero, a total coliform result of one.
In December 2025 rehabilitation work was performed for Well 5 including pulling the pump, an inspection of the interior of the well by camera and high-pressure air and water jetting.

Question ID	DWMR1009001	**Question Type**	Legislative

Legislative Requirement(s):
SDWA | 31 | (1);

Question:
Were measures in place to protect the groundwater and/or GUDI source in accordance with the Municipal Drinking Water Licence and Drinking Water Works Permit?

Compliance Response(s)/Corrective Action(s)/Observation(s):
Measures were in place to protect the groundwater and/or GUDI source.

Pursuant to Conditions 16.2.8 to 16.2.10 of Schedule B of Municipal Drinking Water Licence 147-104 (Issue 4), the Bayshore Village Subdivision Operations Manual must include:
• Condition 16.2.8: An inspection schedule for all wells associated with the drinking water system, including production, standby, test, and monitoring wells.
• Condition 16.2.9: Inspection and maintenance procedures for the entire well structure of each well, covering all above- and below-grade components.
• Condition 16.2.10: Remedial action plans for instances where inspections identify non-compliance with regulatory requirements or potential risks to raw well water quality.

To meet these conditions, the Owner and Operating Authority have incorporated a dedicated section on well maintenance and inspections in the Operations Manual. This includes routine inspections of both above and below grade components.
During the inspection review period operators performed monthly inspections of all above grade components of the three supply wells. Operators also monitor raw water flows as an indicator of well performance. In December 2025 rehabilitation work was performed for Well 5 including pulling the pump, an inspection of the interior of the well by camera and high-pressure air and water jetting.

Question ID	DWMR1014001	**Question Type**	Legislative

Legislative Requirement(s):
SDWA | 31 | (1);

Question:
Was flow monitoring performed as required by the Municipal Drinking Water Licence or Drinking Water Works Permit?

Compliance Response(s)/Corrective Action(s)/Observation(s):
Flow monitoring was performed as required.

Pursuant to Condition 2.1 of Schedule C of Municipal Drinking Water Licence 147-104 Issue Number 4, the Owner is required to undertake continuous flow measurement and recording of both the flow rate and daily volume of treated water entering the distribution system, as well as the flow rate and daily volume of water entering the treatment subsystem. To meet these requirements, the Bayshore Village Subdivision Drinking Water System is equipped with a flow meter on each of the three raw water headers and on the distribution line after the reservoir.
Flow monitoring data is collected through the SCADA system and is actively monitored by operators. During the inspection review period there were numerous instances of the flow measurement from Well 4 spiking. These values were not true readings, and it was indicated in the logbook that after investigation it was determined that the false high readings were the result of the flow meter emptying due to negative flow back to the well.

Question ID	DWMR1015001	**Question Type**	Legislative

Legislative Requirement(s):
SDWA | 31 | (1);

Question:
Were flow measuring devices calibrated or verified in accordance with the requirements of the Municipal Drinking Water Licence?

Compliance Response(s)/Corrective Action(s)/Observation(s):
Flow measuring devices were calibrated or verified as required.

Condition 3 of Schedule C of Municipal Drinking Water Licence 147-104 Issue Number 4 requires that all flow measuring devices that are required by regulation, by a condition in the drinking water works permit 147-204, or by a condition otherwise imposed by the Ministry, shall be checked and where necessary calibrated in accordance with the manufacturer's instructions. If the manufacturer's instructions do not indicate how often to check and calibrate a flow measuring device, the equipment shall be checked and where necessary calibrated at least once every 12 months during which the drinking water system is in operation. Annual calibrations are to occur not more than 30 days after the first anniversary of the day the equipment was checked and calibrated in the previous 12-month period. During the inspection review period the three raw water and one distribution flow meters installed in the Bayshore Village Subdivision treatment building were calibrated in the beginning of January 2026. All flow meters were left in a 'pass' condition. The previous calibrations had occurred in January 2025.

Question ID	DWMR1016001	**Question Type**	Legislative

Legislative Requirement(s):
SDWA | 31 | (1);

Question:
Was the owner in compliance with the conditions associated with maximum flow rate or the rated/operational capacity in the Municipal Drinking Water Licence?

Compliance Response(s)/Corrective Action(s)/Observation(s):
The owner was in compliance with the conditions associated with maximum flow rate and/or the rated/operational capacity conditions.

Condition 1.1 of Schedule C of Municipal Drinking Water Licence 147-104, Issue Number 4 states that the flow from the treatment subsystem to the distribution system shall not exceed 1,243.8 cubic metres per day. Condition 1.2 of Schedule C of Municipal Drinking Water Licence 147-104 Issue Number 4 does not contain a maximum flow rate for the Bayshore Village Subdivision Drinking Water System. A review of flow data for the inspection period confirmed that there were no exceedances of the prescribed rated capacity for the Bayshore Village Subdivision Drinking Water System.

Question ID	DWMR1017001	**Question Type**	Legislative

Legislative Requirement(s):
SDWA | 31 | (1);

Question:
Were appropriate records of flows and any capacity exceedances made in accordance with

the Municipal Drinking Water Licence?

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

Appropriate records of flows and any capacity exceedances were made as required.

Condition 2.2 of Schedule C of Municipal Drinking Water Licence 147-104 Issue Number 4 requires that for each treatment subsystem component identified in column 2 of Table 2 and in addition to any other flow measurement and recording that may be required, continuous flow measurement and recording shall be undertaken for the flow rate and daily volume of water that flows into the treatment subsystem component.
Flow meters are installed on each of the three raw water supply lines. The flow rate is recorded every minute by the SCADA system and paperless chart recorder. The pump run hours, daily volume, percentage of allowable takings and minimum and maximum flow rates are all recorded on the daily print outs. Operators have remote access to the SCADA system.

Condition 2.3 of Schedule C of Municipal Drinking Water Licence 147-104 Issue Number 4 requires that where a rated capacity from Table 1 or a maximum flow rate from Table 2 is exceeded, a record be made of the difference between the measured amount and the applicable rated capacity or maximum flow rate, the time and date of the measurement, the reason for the exceedance and the duration of time that lapses between the applicable rated capacity or maximum flow rate being exceeded and the next measurement where the applicable rated capacity or maximum flow rate is no longer exceeded.
Table 1 states the rated capacity of the system as 1,243.8 m3/day. The rated capacity for Bayshore Village Subdivision was not exceeded during the inspection review period. There is not a maximum flow rate listed in Table 2 of the Municipal Drinking Water Licence.

Question ID	DWMR1013001	**Question Type**	Legislative

Legislative Requirement(s):
OWRA | 34 | (3);

Question:
Was the owner in compliance with all conditions of the Permit To Take Water?

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

The owner was in compliance with all conditions of the Permit To Take Water.

Condition 3 of Permit to Take Water (PTTW) P-300-6300823231 limits the takings for Well 3 to 409 L/minutes and 196,300 L/day/; for Well 4 to 1,682 L/min and 807,500 L/day; and for Well 5 to 500 L/min and 240,100 L/day. During the inspection review period there were numerous occasions when the Well 4 flow meter measured values above 1,682 L/min. It was noted in the Bayshore Village Subdivision Drinking Water System logbook that these elevated readings were not true values. It was determined that there was negative flow back to the well consequently emptying the flow meter and creating false flow spikes. There were no exceedances of the taking limits prescribed in the PTTW that were accurate.

Condition 4.1 of PTTW P-300-6300823231requires that the Permit Holder shall maintain a record of all water takings. The daily volume of water taken shall be measured by a flow meter or calculated in accordance with the method described in the application for this Permit, or as otherwise accepted by the Director. This record shall include the dates and times of water takings, the rates of pumping, and an estimated calculation of the total amounts of water pumped per day for each day that water is taken under the authorization of this Permit. A separate record shall be maintained for each source. The Permit Holder shall keep all required records up to date and available at or near the site of the taking and shall produce the records immediately for inspection by a Provincial Officer upon his or her request. The Permit Holder, unless otherwise required by the Director, shall submit, on or before March 31st in every year, the records required by this condition to the Ministry's Regulatory Self Reporting System.
The required flow data is maintained for each source and was submitted to the Ministry as required.
Condition 4.1 of PTTW P-300-6300823231requires that the Permit Holde shall maintain a continuous water level recorder in at least one of the production wells identified in Table A, or in a site monitor well of comparable depth to the production wells. All data collected shall be submitted to the Ministry in support of any application for renewal or technical amendment of this Permit, along with a description of the monitoring location and protocol.
There were no applications for renewal or amendment of the Permit during the inspection review period. There are continuous water level monitors in all three of the supply wells for Bayshore Village Subdivision Drinking Water System.

Question ID	DWMR1018001	**Question Type**	Legislative

Legislative Requirement(s):
SDWA | 31 | (1);

Question:
Did the owner ensure that equipment was installed in accordance with Schedule A and Schedule C of the Drinking Water Works Permit?

Compliance Response(s)/Corrective Action(s)/Observation(s):
The owner ensured that equipment was installed as required.

At the time of inspection, the installed equipment at the Bayshore Village Subdivision pumphouse appeared to be installed as per the description in Schedule A of Drinking Water Works Permit 147-204 Issue Number 3, dated February 4, 2022. The distribution continuous chlorine analyser installed in the Hayloft building is not part of the description in the Permit. Schedule C is not applicable to the Bayshore Village Subdivision Drinking Water Works Permit.

Question ID	DWMR1021002	**Question Type**	Legislative

Legislative Requirement(s):
SDWA | 31 | (1);

Question:
Were Form 2 documents prepared as required?

Compliance Response(s)/Corrective Action(s)/Observation(s):
Form 2 documents were prepared as required.

During the inspection review period two Form 2s were completed as required for the replacement of the continuous analyser that measures the treated water chlorine and pH, and the replacement of the variable frequency controller for high lift pump 4. The instruments were replaced with like for like.

Question ID	DWMR1028001	Question Type	Legislative

Legislative Requirement(s):
SDWA | 31 | (1);

Question:
Were up-to-date plans for the drinking water system made available in such a manner that they could be readily viewed by all persons responsible for all or part of the operation of the drinking water system, in accordance with the Drinking Water Works Permit and Municipal Drinking Water Licence?

Compliance Response(s)/Corrective Action(s)/Observation(s):
Plans for the drinking water system were kept up-to-date and made available as required.

Condition 15.3 of Schedule B of Municipal Drinking Water Licence 147-104 Issue Number 4 requires that process flow diagrams and process and instrumentation diagrams for any treatment subsystem shall be kept in a place, or made available in such a manner, that they may be readily viewed by all persons responsible for all or part of the operation of the drinking water system.
Process drawings and plans of the treatment works and distribution system are kept onsite in the treatment building, at the office and are also available electronically to Operators.

Question ID	DWMR1025001	Question Type	Legislative

Legislative Requirement(s):
SDWA | 31 | (1);

Question:
Were all parts of the drinking water system that came in contact with drinking water disinfected in accordance with a procedure listed in Schedule B of the Drinking Water Works Permit?

Compliance Response(s)/Corrective Action(s)/Observation(s):
All parts of the drinking water system were disinfected as required.

Pursuant to Section 2.3 of Schedule B of Drinking Water Works Permit 147-204 Issue Number 3 all parts of the drinking water system in contact with drinking water that are added, modified, replaced, extended shall be disinfected in accordance with a procedure approved

by the Director or in accordance with the applicable provisions of the following documents:
• The Ministry's Watermain Disinfection Procedure (August 1, 2020);
• Any updated version of the Watermain Disinfection Procedure, subject to Condition 2.3.2;
• AWWA C652 – Standard for Disinfection of Water-Storage Facilities;
• AWWA C653 – Standard for Disinfection of Water Treatment Plants;
• AWWA C654 – Standard for Disinfection of Wells.
All applicable components of the Bayshore Village Subdivision Drinking Water System are disinfected in accordance with these procedures when required. The Operations Manual outlines the requirements stipulated in the Drinking Water Works Permit.
During the inspection review period rehabilitation work was performed on Well 5. The well was superchlorinated after the works and left to sit overnight. Clear microbiological sample results were obtained prior to the well being put back into service.

Question ID	DWMR1023001	**Question Type**	Legislative

Legislative Requirement(s):
SDWA | O. Reg. 170/03 | 1-2 | (2);

Question:
Did records indicate that the treatment equipment was operated in a manner that achieved the design capabilities prescribed by O. Reg. 170/03, Drinking Water Works Permit and/or Municipal Drinking Water Licence at all times that water was being supplied to consumers?

Compliance Response(s)/Corrective Action(s)/Observation(s):
Records indicated that the treatment equipment was operated in a manner that achieved the design capabilities prescribed.

Pursuant to Section 1-3 of Schedule 1 of Ontario Regulation 170/03, the Owner of a drinking water system that sources water from groundwater is required to ensure the provision of treatment equipment capable of achieving primary disinfection at all times. This must be in accordance with the Ministry's Procedure for Disinfection of Drinking Water in Ontario, including achieving at least 99 percent removal or inactivation of viruses before water enters the distribution system.

Based on the continuously recorded and manually sampled data provided by the Operating Authority and reviewed during this inspection, it appears that the Bayshore Village Subdivision Drinking Water System consistently met the required level of treatment throughout the inspection review period. Adequate contact time is provided through the 112 m3 reservoir, and treatment reliability is supported by auxiliary and duty chemical feed pumps with automatic switchover in the event of pump failure. Additional safeguards include alarms for high and low chlorine residuals, high and low reservoir level and chlorine duty pump fail. All of these alarms call out the duty operator. Critical alarms are tested regularly. High lift pumps lock out in the event of a low reservoir level, to prevent water with insufficient contact time from entering the distribution system.

Question ID	DWMR1027001	Question Type	Legislative

Legislative Requirement(s):
SDWA | 31 | (1);

Question:
Did the owner have evidence indicating that chemicals and materials that came in contact with water within the drinking water system met all applicable AWWA and ANSI standards in accordance with the Municipal Drinking Water Licence and Drinking Water Works Permit?

Compliance Response(s)/Corrective Action(s)/Observation(s):
The owner had evidence indicating that chemicals and materials that came in contact with water within the drinking water system met the applicable standards.

Condition 14.1 of Schedule B of Municipal Drinking Water Licence 147-104 Issue Number 4 requires that all chemicals and materials used in the alteration or operation of the drinking water system that come into contact with water within the system shall meet all applicable standards set by both the American Water Works Association ("AWWA") and the American National Standards Institute ("ANSI") safety criteria standards NSF/60, NSF/61 and NSF/372.

During the inspection review period sodium hypochlorite was the only chemical used in the treatment of drinking water at Bayshore Village Subdivision Drinking Waster System. The chemical met the applicable safety standards.

Question ID	DWMR1024001	Question Type	Legislative

Legislative Requirement(s):
SDWA | O. Reg. 170/03 | 1-2 | (2);

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

Compliance Response(s)/Corrective Action(s)/Observation(s):
Records confirmed that the water treatment equipment which provides chlorination or chloramination for secondary disinfection was operated as required.

Pursuant to Subsection 1-2 (2), paragraph 4 of Schedule 1 of Ontario Regulation 170/03, where chlorination is used for secondary disinfection, the Owner must ensure that the equipment is operated in a manner that maintains a free chlorine residual of no less than 0.05 milligrams per litre at all times and at all locations within the distribution system.
A review of operational records for the inspection review period confirmed that free chlorine residuals within the Bayshore Village Subdivision distribution system consistently met this requirement, with no recorded values falling below the prescribed minimum. At the time of inspection, the inspector measured the chlorine residual at the Bayshore sample station with a result of 1.09 mg/L. The minimum distribution chlorine residual recorded during the inspection review period was 0.52 mg/L and the maximum was 2.15 mg/L.

Question ID	DWMR1033001	Question Type	Legislative

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

Question:
Was secondary disinfectant residual tested as required for the large municipal residential distribution system?

Compliance Response(s)/Corrective Action(s)/Observation(s):
Secondary disinfectant residual was tested as required.

Subsection 7-2 (3) and (4) of Schedule 7 of Ontario Regulation 170/03 require that the owner of a large municipal residential system that provides secondary disinfection and the operating authority for the system shall ensure that at least seven distribution samples are taken each week and are tested immediately for free chlorine residual, if the system provides chlorination and does not provide chloramination. At least four of the samples must be taken on one day of the week, at least 48 hours after the last sample was taken in the previous week. At least three of the samples must be taken on a second day of the week, at least 48 hours after the last sample was taken during the week. These rules do not apply if at least one sample is taken each day.
There is a continuous chlorine analyser installed in the Hayloft building located within the Bayshore Village Subdivision distribution system. Operators have remote access to the readings made by the analyser. From the beginning of the inspection review period until the end of April 2026, daily readings made by the Hayloft analyser were recorded by Operators. From May 1, 2026, to the end of the inspection review period four distribution samples were sampled on one day of the week and three distribution samples were measured on a second day of the week, at least 48 hours later, and recorded on the dedicated distribution chlorine residual spreadsheet.

Question ID	DWMR1036001	Question Type	Legislative

Legislative Requirement(s):
SDWA | O. Reg. 170/03 | 6-7 | (1);

Question:
Where continuous monitoring equipment was not used for chlorine residual analysis, were samples tested using an acceptable portable device?

Compliance Response(s)/Corrective Action(s)/Observation(s):
Samples for chlorine residual analysis were tested using an acceptable portable device.

Subsection 6-7. (1) of Schedule 6 of Ontario Regulation 170/03 requires that if a water sample is required to be taken and tested for free chlorine residual, the owner of the drinking water system and the operating authority for the system shall ensure that the testing is conducted using an electronic direct readout colourimetric or amperometric chlorine analyzer. Operators used appropriate electronic direct readout colourimetric chlorine analyzers for all chlorine residuals not measured by continuous monitoring equipment during the inspection review period. The units were properly maintained, including annual third party calibrations.

Question ID	DWMR1030001	Question Type	Legislative

Legislative Requirement(s):
SDWA | O. Reg. 170/03 | 7-2 | (1); SDWA | O. Reg. 170/03 | 7-2 | (2);

Question:
Was primary disinfection chlorine monitoring being conducted at a location approved by Municipal Drinking Water Licence and/or Drinking Water Works Permit or at/near a location where the intended CT had just been achieved?

Compliance Response(s)/Corrective Action(s)/Observation(s):
Primary disinfection chlorine monitoring was conducted as required.

Pursuant to Subsection 7-2 (1) of Schedule 7 of Ontario Regulation 170/03, drinking water systems that utilize chlorination for primary disinfection are required to have continuous monitoring equipment in place to sample and test free chlorine residuals at or near the point where the intended contact time has just been achieved, in accordance with the Ministry's Procedure for Disinfection of Drinking Water in Ontario.
In the Bayshore Village Subdivision Drinking Water System, a continuous chlorine residual analyser is installed within the treatment building. This analyser is supplied water via a dedicated line from the point of entry to the distribution system – immediately downstream of the reservoir – ensuring that monitoring occurs at the location where the required contact time has been completed.

Question ID	DWMR1035001	Question Type	Legislative

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

Question:
Were operators examining continuous monitoring test results and did they examine the results within 72 hours of the test?

Compliance Response(s)/Corrective Action(s)/Observation(s):
Operators were examining continuous monitoring test results as required.

Pursuant to Subsection 6-5 (1) 3 of Schedule 6 of Ontario Regulation 170/03, test results recorded under paragraph 1 or 2 must be reviewed by a certified operator within 72 hours of the tests being conducted.
During the inspection review period continuous monitoring test results were consistently reviewed by certified operators within the required 72-hour timeframe. The Operating Authority maintains a spreadsheet for the completion of the review of continuous monitoring test results, which the inspector reviewed.

Question ID	DWMR1038001	Question Type	Legislative

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

Question:
Was continuous monitoring equipment that was being utilized to fulfill O. Reg. 170/03 requirements performing tests for the parameters with at least the minimum frequency and recording data with the prescribed format?

Compliance Response(s)/Corrective Action(s)/Observation(s):
Continuous monitoring equipment that was being utilized to fulfill O. Reg. 170/03 requirements was performing tests for the parameters with at least the minimum frequency and recording data with the prescribed format.

Pursuant to Subsection 6-5 (1) of Schedule 6 of Ontario Regulation 170/03, continuous monitoring equipment used for sampling and testing parameters listed in the Table included in Schedule 6 must meet specific performance standards. For the Bayshore Village Subdivision Drinking Water System, this requirement applies to the continuous chlorine analyser used to monitor free chlorine residuals for primary disinfection at or near the point where the intended contact time is achieved.
Specifically, paragraph 1, subparagraph i of Subsection 6-5 (1), along with the associated Table, requires that the analyser measure free chlorine residual at a minimum frequency of once every five minutes.
Chlorine residual values are captured every minute by the SCADA system. A daily summary is generated that includes the minimum, maximum and average values, as well as a snapshot from approximately six am. Operators have remote access to the SCADA system.
During the inspection review period when the treated water continuous chlorine and pH analyser was replaced, an Operator took manual chlorine residual readings every five minutes at the appropriate location to satisfy this requirement during the period an analyser was not connected to the system.

Question ID	DWMR1037001	**Question Type**	Legislative

Legislative Requirement(s):
SDWA | O. Reg. 170/03 | 6-5 | (1)5-10; SDWA | O. Reg. 170/03 | 6-5 | (1.1);

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

Compliance Response(s)/Corrective Action(s)/Observation(s):
All required continuous monitoring equipment utilized for sampling and testing were equipped with alarms or shut-off mechanisms that satisfied the standards

Pursuant to Subsection 6-5 (1), paragraph 5i, and Subsection 6-5 (1.1), paragraph 1 of Schedule 6 of Ontario Regulation 170/03, continuous monitoring equipment used for sampling and testing under the regulation must meet specific performance standards.

To comply with these requirements, the Owner and Operating Authority has installed a continuous chlorine analyzer to monitor free available chlorine residual at or near the point

where the intended contact time for primary disinfection is achieved. This analyzer is integrated with the SCADA system and is configured to trigger alarms to the on-call operator in the event of high or low chlorine residual levels, ensuring timely response and operational oversight. The low chlorine alarm level is set at a point to afford an Operator time to respond before primary disinfection would be compromised. Operators test the alarms monthly to ensure proper functioning.
During the inspection review period there were three low chlorine alarms for the Bayshore Village Subdivision treated water and one alarm from the analyser installed in the Hayloft building within the distribution system that operators responded to. The distribution system alarm was not a true alarm, and an Operator was able to check the analyser values remotely to confirm proper secondary disinfection. Operators responded to the plant for the three treated water chlorine alarms and took appropriate action for each instance, including adding chlorine to the reservoir where warranted. In no cases was primary disinfection compromised. All other values below the alarm set point during the inspection review period were the result of maintenance activities being performed on the analyser or alarm testing.

Question ID	DWMR1040001	**Question Type**	Legislative

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

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

Compliance Response(s)/Corrective Action(s)/Observation(s):
All continuous analysers were calibrated, maintained, and operated as required.

Pursuant to Subsection 6-5 (1), paragraph 8 of Schedule 6 of Ontario Regulation 170/03, continuous monitoring equipment must be checked and calibrated in accordance with the manufacturer's instructions. Additionally, Subsection 6-5 (1), paragraph 10 requires that where the manufacturer does not specify a calibration frequency and paragraph 9 does not apply, the equipment must be checked and calibrated as often as necessary to ensure test results remain within the following margins of error:
• For free chlorine residuals: ±0.05 mg/L when concentrations are ≤1.0 mg/L, and proportionally higher for concentrations >1.0 mg/L.
• For free and total chlorine residuals used to determine combined chlorine: the same margin of ±0.05 mg/L applies under the same conditions.
Further, Condition 4.1 of Schedule C of Drinking Water Licence 147-104 Issue Number 4 requires that any measuring instrumentation used for CT monitoring be checked and, if necessary, calibrated at least once every 12 months, or more frequently if specified by the manufacturer. Subsection 4.1.1 clarifies that this calibration must occur no more than 30 days after the anniversary of the previous calibration date.
To meet these requirements operational staff perform regular comparisons of the free chlorine residual reading measured by the continuous chlorine residual analyzer and a portable handheld colorimetric device. If a comparison reveals significant discrepancies, the analyzers are adjusted, usually if more than 0.05 mg/L. Operators perform monthly

preventative maintenance on the analysers which includes cleaning and changing the electrolyte where required. The continuous chlorine analyser and hand held colorimeters are calibrated annually as per the manufacturer's recommendations. During the inspection review period the continuous chlorine anlyser and three hand held colorimeters were calibrated in January 2026. All maintenance, testing, comparison and calibration activities are documented in the Bayshore Village Drinking Water System logbook.

Question ID	DWMR1108001	Question Type	Legislative

Legislative Requirement(s):
SDWA | O. Reg. 170/03 | 6-5 | (1)5-10; SDWA | O. Reg. 170/03 | 6-5 | (1.1);

Question:
Where continuous monitoring equipment used for the monitoring of free chlorine residual, total chlorine residual, combined chlorine residual or turbidity, required by O. Reg. 170/03, Municipal Drinking Water Licence, Drinking Water Works Permit, or order triggered an alarm or an automatic shut-off, did a qualified person respond as required and take appropriate actions?

Compliance Response(s)/Corrective Action(s)/Observation(s):
A qualified person responded as required and took appropriate actions.

During the inspection review period there was one low chlorine alarm from the distribution chlorine analyser, three alarms from the treated water chlorine analyser, SCADA alarm for Well 4 spikes, two alarms for low reservoir level, one alarm for high treated water turbidity and a no communication alarm. Operators responded to all alarms appropriately. Operators are able to login remotely to check the plant status and view trending. Operators attended the plant where appropriate and took corrective actions. There were no instances of primary or secondary disinfection being compromised.

Question ID	DWMR1099001	Question Type	Information

Legislative Requirement(s):
Not Applicable

Question:
Do records show that water provided by the drinking water system met the Ontario Drinking Water Quality Standards?

Compliance Response(s)/Corrective Action(s)/Observation(s):
Records showed that all water sample results met the Ontario Drinking Water Quality Standards.

All sample results from the inspection review period as well as the most recent sample results for Schedule 23 and Schedule 24 parameters met the Ontario Drinking Water Quality Standards under Ontario Regulation 169/03.

Question ID	DWMR1079001	Question Type	Legislative

Legislative Requirement(s):
SDWA | O. Reg. 170/03 | 10-4 | (1); SDWA | O. Reg. 170/03 | 10-4 | (2); SDWA | O. Reg. 170/03 | 10-4 | (3);

Question:
Were raw water microbiological sampling requirements prescribed by Schedule 10-4 of O. Reg. 170/03 for large municipal residential systems met?

Compliance Response(s)/Corrective Action(s)/Observation(s):
Raw water microbiological sampling requirements were met.

Section 10-4 of Schedule 10 of Ontario Regulation 170/03 requires the owner of a drinking water system and the operating authority for the system shall ensure that a water sample is taken at least once every week from the drinking water system's raw water, before any treatment is applied to the water. Samples must be collected from each well in the system. Samples must be tested for Escherichia coli and total coliforms.
During the inspection review period samples were collected from Well 3, Well 4 and Well 5 weekly and tested for the required parameters.
An additional seven raw water samples were collected from Well 5 on four different days and were tested for Escherichia coli and total coliforms after rehabilitation work was performed on Well 5 in December 2025.

Question ID	DWMR1083001	Question Type	Legislative

Legislative Requirement(s):
SDWA | O. Reg. 170/03 | 10-3;

Question:
Were treated microbiological sampling requirements prescribed by Schedule 10-3 of O. Reg. 170/03 for large municipal residential systems met?

Compliance Response(s)/Corrective Action(s)/Observation(s):
Treated microbiological sampling requirements were met.

Pursuant to Subsection 10-3.(1) of Schedule 10 of Ontario Regulation 170/03, the Owner and Operating Authority of a large municipal residential drinking-water system must ensure that a treated water sample is collected at least once per week and tested for Escherichia coli, total coliforms, and general bacterial population, expressed as colony counts on a heterotrophic plate count (HPC).

Treated water samples were collected from the Bayshore Village Subdivision Drinking Water System each week during the inspection review period and tested for the required parameters.

Question ID	DWMR1081001	Question Type	Legislative

Legislative Requirement(s):
SDWA | O. Reg. 170/03 | 10-2 | (1); SDWA | O. Reg. 170/03 | 10-2 | (2); SDWA | O. Reg.

170/03 | 10-2 | (3);

Question:
Were distribution microbiological sampling requirements prescribed by Schedule 10-2 of O. Reg. 170/03 for large municipal residential systems met?

Compliance Response(s)/Corrective Action(s)/Observation(s):
Distribution microbiological sampling requirements were met.

Pursuant to Subsection 10-2.(1) of Schedule 10 of Ontario Regulation 170/03, the Owner and Operating Authority of a large municipal residential drinking water system must ensure that a minimum of eight distribution system samples are collected each month, plus one additional sample for every 1,000 people served. Bayshore Village Subdivision Drinking Water System serves an approximate population of 900 and is required to collect eight distribution samples each month, with at least one sample collected each week.

In addition, Subsection 10-2.(2) prescribes that each of these samples be tested for Escherichia coli and total coliforms, and that at least 25 percent of the samples be tested for general bacterial population, expressed as colony counts on a heterotrophic plate count (HPC).

During the inspection review period two distribution samples were collected each week. All samples were tested for Escherichia coli, total coliforms and HPC.

Question ID	DWMR1096001	**Question Type**	Legislative

Legislative Requirement(s):
SDWA | O. Reg. 170/03 | 6-3 | (1);

Question:
Did records confirm that chlorine residual tests were conducted at the same time and location as microbiological samples?

Compliance Response(s)/Corrective Action(s)/Observation(s):
Records confirmed that chlorine residual tests were conducted as required.

Pursuant to subsection 6-3(1) of Schedule 6 of Ontario Regulation 170/03, where a water sample is required to be collected and analyzed for a microbiological parameter, the owner and operating authority of the drinking water system must ensure that an additional sample is taken concurrently from the same location and is immediately tested for free chlorine residual, provided that the system employs chlorination.

Records reviewed confirm that disinfectant residual measurements were obtained concurrently with the collection of treated and distribution microbiological samples collected during the inspection review period.

Question ID	DWMR1084001	Question Type	Legislative

Legislative Requirement(s):
SDWA | O. Reg. 170/03 | 13 | (1); SDWA | O. Reg. 170/03 | 13 | (2); SDWA | O. Reg. 170/03 | 13 | (3);

Question:
Were inorganic parameter sampling requirements prescribed by Schedule 13-2 of O. Reg. 170/03 met?

Compliance Response(s)/Corrective Action(s)/Observation(s):
Inorganic parameter sampling requirements were met.

Pursuant to Subsection 13-2. (1) of Schedule 13 of Ontario Regulation 170/03, the Owner and Operating Authority of a large municipal residential drinking-water system that obtains water from a raw water supply that is groundwater, must ensure that a treated water sample is collected every 36 months and tested for all parameters listed in Schedule 23 of Ontario Regulation 170/03.
During the inspection review period inorganic parameter sampling did not take place, nor was it required. The most recent Schedule 23 samples from the Bayshore Village Subdivision Drinking Water System were collected on August 5, 2025, and submitted to an accredited laboratory for analysis.

Question ID	DWMR1085001	Question Type	Legislative

Legislative Requirement(s):
SDWA | O. Reg. 170/03 | 13-4 | (1); SDWA | O. Reg. 170/03 | 13-4 | (2); SDWA | O. Reg. 170/03 | 13-4 | (3);

Question:
Were organic parameter sampling requirements prescribed by Schedule 13-4 of O. Reg. 170/03 met?

Compliance Response(s)/Corrective Action(s)/Observation(s):
Organic parameter sampling requirements were met.

Pursuant to Subsection 13-4. (1) of Schedule 13 of Ontario Regulation 170/03, the Owner and Operating Authority of a large municipal residential drinking-water system that obtains water from a raw water supply that is groundwater, must ensure that a treated water sample is collected every 36 months and tested for all parameters listed in Schedule 24 of Ontario Regulation 170/03.
During the inspection review period Schedule 24 parameter sampling did not take place, nor was it required. The most recent Schedule 24 samples from the Bayshore Village Subdivision Drinking Water System were collected on August 5, 2025, and submitted to an accredited laboratory for analysis.

Question ID	DWMR1086001	Question Type	Legislative

Legislative Requirement(s):
SDWA | O. Reg. 170/03 | 13-6.1 | (1); SDWA | O. Reg. 170/03 | 13-6.1 | (2); SDWA | O. Reg.

170/03 | 13-6.1 | (3); SDWA | O. Reg. 170/03 | 13-6.1 | (4); SDWA | O. Reg. 170/03 | 13-6.1 | (5); SDWA | O. Reg. 170/03 | 13-6.1 | (6);

Question:
Were haloacetic acid sampling requirements prescribed by Schedule 13-6 of O. Reg. 170/03 met?

Compliance Response(s)/Corrective Action(s)/Observation(s):
Haloacetic acid sampling requirements were met.

Pursuant to Section 13-6.1 of Schedule 13 of Ontario Regulation 170/03, the Owner and Operating Authority of a drinking water system that uses chlorination or chloramination must ensure that at least one distribution system sample is collected in each calendar quarter from a location within the distribution system - or connected plumbing - where the potential for the formation of haloacetic acids (HAAs) is likely to be elevated. These samples must be tested for HAAs.

During the inspection review period, HAA samples from the Bayshore Village Subdivision Drinking Water System distribution system were collected on February 4, 2026, and May 4, 2026. The HAA results during the inspection review period were 5.3 ug/L and 5.6 ug/L.

Question ID	DWMR1087001	**Question Type**	Legislative

Legislative Requirement(s):
SDWA | O. Reg. 170/03 | 13-6 | (1); SDWA | O. Reg. 170/03 | 13-6 | (2); SDWA | O. Reg. 170/03 | 13-6 | (3); SDWA | O. Reg. 170/03 | 13-6 | (4); SDWA | O. Reg. 170/03 | 13-6 | (5); SDWA | O. Reg. 170/03 | 13-6 | (6);

Question:
Were trihalomethane sampling requirements prescribed by Schedule 13-6 of O. Reg. 170/03 met?

Compliance Response(s)/Corrective Action(s)/Observation(s):
Trihalomethane sampling requirements were met.

Pursuant to Subsections 13-6. (1) and 13-6. (2) of Schedule 13 of Ontario Regulation 170/03, the Owner and Operating Authority of a drinking water system that uses chlorination must ensure that at least one distribution system sample is collected in each calendar quarter. The sample must be taken from a location within the distribution system - or connected plumbing - where the potential for the formation of trihalomethanes (THMs) is likely to be elevated and must be tested for THMs.

During the inspection review period THM samples from the Bayshore Village Subdivision Drinking Water System distribution system were collected on February 4, 2026, and May 4, 2026, and submitted to an accredited laboratory for analysis.
The THM results during the inspection review period were 44 ug/L and 66 ug/L.

Question ID	DWMR1088001	Question Type	Legislative

Legislative Requirement(s):
SDWA | O. Reg. 170/03 | 13-7;

Question:
Were nitrate/nitrite sampling requirements prescribed by Schedule 13-7 of O. Reg. 170/03 met?

Compliance Response(s)/Corrective Action(s)/Observation(s):
Nitrate/nitrite sampling requirements were met.

Pursuant to subsection 13-7 of Schedule 13 of Ontario Regulation 170/03, a municipality is required to ensure that at least one water sample is collected and analyzed for nitrate and nitrite every three months. Additionally, subsection 6-1.1(4) of Schedule 6 of Ontario Regulation 170/03 prescribes that such samples must be collected no earlier than 60 days and no later than 120 days following the date on which the previous sample for nitrate and nitrite was taken during the preceding three-month period or calendar quarter.

During the inspection review period nitrate/nitrite samples from the Bayshore Village Subdivision Drinking Water System were collected on February 4, 2026, and May 4, 2026, and submitted to an accredited laboratory for analysis as required.

Question ID	DWMR1089001	Question Type	Legislative

Legislative Requirement(s):
SDWA | O. Reg. 170/03 | 13-8;

Question:
Were sodium sampling requirements prescribed by Schedule 13-8 of O. Reg. 170/03 met?

Compliance Response(s)/Corrective Action(s)/Observation(s):
Sodium sampling requirements were met.

Pursuant to subsection 13-8 of Schedule 13 of Ontario Regulation 170/03, a municipality and operating authority are required to ensure that at least one water sample is collected and analyzed for sodium content within every 60-month period. Additionally, subsection 6-1.1(7) of Schedule 6 of Ontario Regulation 170/03 prescribes that such sodium sampling must occur no more than 90 days before or after the fifth anniversary of the date on which the previous sodium sample was collected within the preceding 60-month period.

During the inspection review period a sodium sample from the Bayshore Village Subdivision Drinking Water System was not collected or required. The most recent sodium sample was collected on August 5, 2025, and submitted to an accredited laboratory for analysis. A resample for sodium was collected on August 11, 2025. Sodium levels above 20 mg/L are an ongoing issue for the Bayshore Village Subdivision Drinking Water System.

Question ID	DWMR1090001	Question Type	Legislative

Legislative Requirement(s):
SDWA | O. Reg. 170/03 | 13-9;

Question:
Where fluoridation is not practiced, were fluoride sampling requirements prescribed by Schedule 13-9 of O. Reg. 170/03 met?

Compliance Response(s)/Corrective Action(s)/Observation(s):
Fluoride sampling requirements were met.

Pursuant to subsection 13-9 of Schedule 13 of Ontario Regulation 170/03, a municipality and operating authority is required to ensure that at least one water sample is collected and analyzed for fluoride within every 60-month period. Furthermore, subsection 6-1.1(7) of Schedule 6 of Ontario Regulation 170/03 prescribes that such a fluoride sample must be taken no fewer than 90 days before or after the fifth anniversary of the date on which the previous fluoride sample was collected within the preceding 60-month interval.

During the inspection review period a fluoride sample from the Bayshore Village Subdivision Drinking Water System was not collected or required. The most recent fluoride sample from the Bayshore Village Subdivision Drinking Water System was collected on August 3, 2022, and submitted to an accredited laboratory for analysis.

Question ID	DWMR1092001	Question Type	Legislative

Legislative Requirement(s):
SDWA | O. Reg. 170/03 | 6-2;

Question:
Were water samples taken at the prescribed location?

Compliance Response(s)/Corrective Action(s)/Observation(s):
Water samples were taken at the prescribed location.

Section 6-2 of Schedule 6 of Ontario Regulation 170/03 requires that unless otherwise specified, a person who is required to ensure that samples are taken under this Regulation shall ensure that they are taken from the point at which water enters the drinking water systems' distribution system.
All samples collected during the inspection review period from the Bayshore Village Subdivision Drinking Water System were collected at the required location for the required parameters, including distribution, treated and raw water samples.

Question ID	DWMR1095001	Question Type	Legislative

Legislative Requirement(s):
SDWA | O. Reg. 170/03 | 15.1-10; SDWA | O. Reg. 170/03 | 15.1-4 | (1); SDWA | O. Reg. 170/03 | 15.1-5 | (1); SDWA | O. Reg. 170/03 | 15.1-5 | (10); SDWA | O. Reg. 170/03 | 15.1-5 | (11); SDWA | O. Reg. 170/03 | 15.1-5 | (2); SDWA | O. Reg. 170/03 | 15.1-5 | (3); SDWA | O.

Reg. 170/03 | 15.1-5 | (4); SDWA | O. Reg. 170/03 | 15.1-5 | (5); SDWA | O. Reg. 170/03 | 15.1-5 | (6); SDWA | O. Reg. 170/03 | 15.1-5 | (7); SDWA | O. Reg. 170/03 | 15.1-5 | (8); SDWA | O. Reg. 170/03 | 15.1-5 | (9); SDWA | O. Reg. 170/03 | 15.1-7 | (1); SDWA | O. Reg. 170/03 | 15.1-7 | (2); SDWA | O. Reg. 170/03 | 15.1-7 | (3); SDWA | O. Reg. 170/03 | 15.1-7 | (4); SDWA | O. Reg. 170/03 | 15.1-9 | (1); SDWA | O. Reg. 170/03 | 15.1-9 | (2); SDWA | O. Reg. 170/03 | 15.1-9 | (3); SDWA | O. Reg. 170/03 | 15.1-9 | (4); SDWA | O. Reg. 170/03 | 15.1-9 | (5); SDWA | O. Reg. 170/03 | 15.1-9 | (6); SDWA | O. Reg. 170/03 | 15.1-9 | (7); SDWA | O. Reg. 170/03 | 15.1-9 | (8); SDWA | O. Reg. 170/03 | 15.1-9 | (9);

Question:
Were lead sampling requirements prescribed by Schedule 15.1 of O. Reg. 170/03 met?

Compliance Response(s)/Corrective Action(s)/Observation(s):
Lead sampling requirements were met.

Schedule 15.1 of Ontario Regulation 170/03 sets out lead sampling and testing requirements for large municipal residential drinking water systems such as Bayshore Village Subdivision Drinking Water System. Schedule 15.1 prescribes lead sampling methodology, frequency and number and type of locations for standard sampling, reduced sampling and the plumbing sampling exemption. For all three sampling scenarios, each year is comprised of two periods: winter sampling, which occurs between December 15 and April 15; and, summer sampling, which occurs between June 15 and October 15.
The Bayshore Village Subdivision drinking water system qualified for 'Reduced Sampling' in accordance with the requirements of section 15.1-5 of Schedule 15.1 of Ontario Regulation 170/03 and has further qualified for an exemption for lead sampling in plumbing. However, the owner and operating authority are still required to ensure that distribution sampling is conducted as follows:

- Alkalinity and pH each year, every 'winter' and 'summer' period from two sampling points.
- Lead once every 3 years, 'winter' and 'summer' period from two sampling points.

During the inspection review period pH and alkalinity samples were measured from two locations within the Bayshore Village Subdivision distribution system on March 2, 2026, as required.
The next lead samples must be collected in the Bayshore Village Subdivision distribution system in both 2028 sampling periods, though sampling may begin as early as December 15–31, 2027.

Question ID	DWMR1097001	**Question Type**	Legislative

Legislative Requirement(s):
SDWA | O. Reg. 170/03 | 7-3 | (1.1);

Question:
If the drinking water system obtained water from a ground water source, was turbidity tested at least once every month from each well that supplied water to the system?

Compliance Response(s)/Corrective Action(s)/Observation(s):
Turbidity was tested as required.

Section 7-3 of Schedule 7 of Ontario Regulation 170/03 requires that the owner of a drinking water system and the operating authority for the system shall ensure that a water sample is taken at least once every month from each well supplying water to the system, from a location that is before raw water enters the treatment system, and is tested for turbidity.
During the inspection review period raw water samples were collected each month from Well 3, Well 4 and Well 5, and tested for turbidity.

Question ID	DWMR1110001	**Question Type**	Legislative

Legislative Requirement(s):
SDWA | O. Reg. 170/03 | 11 | (6);

Question:
Was the annual report prepared by February 28th of the following year and did it contain the required information?

Compliance Response(s)/Corrective Action(s)/Observation(s):
The annual report requirements were met.

Section 11 of Ontario Regulation 170/03 requires that annual reports for large municipal residential systems, such as Bayshore Village Subdivision, cover the period from January 1 to December 31 in a year and be prepared not later than February 28 of the following year. The annual report must contain a brief description of the drinking water system, including a list of water treatment chemicals used, summarize any adverse water quality incidents and corrective actions taken in response, as well as indicate results of samples taken during the reporting period, or the most recent samples if outside of the sampling period. The annual report must also describe any major expenses incurred during the reporting period and indicate where summary reports for municipal counsel will be available. The annual report must also include the number of lead samples taken during the prescribed periods and the number of points where a sample exceeded the lead standard.
The annual report for Bayshore Village Subdivision Drinking Water System was issued on February 13, 2026. The report is available on the Township of Ramara website. The prepared report contains all of the elements required by Section 11 and Schedule 22 of Ontario Regulation 170/03.

Question ID	DWMR1111001	**Question Type**	Legislative

Legislative Requirement(s):
SDWA | O. Reg. 170/03 | 22-2 | (1); SDWA | O. Reg. 170/03 | 22-2 | (2); SDWA | O. Reg. 170/03 | 22-2 | (3); SDWA | O. Reg. 170/03 | 22-2 | (4);

Question:
Did the summary report contain the required information and was it completed and distributed as required?

Compliance Response(s)/Corrective Action(s)/Observation(s):
The summary report requirements were met.

Section 22-2. of Schedule 22 of Ontario Regulation 170/03 requires that municipal council be provided a report by no later than March 31 covering the previous calendar year. The report must list all requirements that were not met, as well as the duration of the non-compliance. The report must also include a summary of quantities and flow rates of water supplied during the year and a comparison of the flow rates to the rated capacity and allowable flow rates. The annual report prepared by the Operating Authority for the Bayshore Village Subdivision Drinking Water System was issued on February 13, 2026, and is available to council on the Township of Ramara website and contains all the required information. Flow values from Well 4 that exceeded the allowable L/min takings in the Bayshore Permit To Take Water were removed from the summary data, as it was determined they were erroneous spikes and did not reflect actual flow rates.

Question ID	DWMR1113001	**Question Type**	Legislative

Legislative Requirement(s):
SDWA | O. Reg. 170/03 | 10.1 | (3);

Question:
Were changes to the system registration information provided to the ministry within ten (10) days of the change?

Compliance Response(s)/Corrective Action(s)/Observation(s):
Changes to the system registration information were provided as required.

Section 10.1 (3) of Ontario Regulation 170/03 requires that if there is any change to the information given to the Director under subsection (1) or (2), the owner of the drinking water system shall give the Director written notice of the change within 10 days of the change. Updates to contact information because of staffing changes were provided to the Director as required during the inspection review period.

Question ID	DWMR1098001	**Question Type**	Legislative

Legislative Requirement(s):
SDWA | O. Reg. 170/03 | 13 | (1); SDWA | O. Reg. 170/03 | 13 | (2); SDWA | O. Reg. 170/03 | 13 | (3);

Question:
Were the required records kept for the periods prescribed by section 13 of O. Reg. 170/03?

Compliance Response(s)/Corrective Action(s)/Observation(s):
The required records were kept for the prescribed periods.

Question ID	DWMR1073001	**Question Type**	Legislative

Legislative Requirement(s):
SDWA | O. Reg. 128/04 | 23 | (1);

Question:
Was an overall responsible operator designated for all subsystems which comprise the drinking water system?

Compliance Response(s)/Corrective Action(s)/Observation(s):
An overall responsible operator was designated for all subsystem.

Pursuant to Subsection 23(1) of Ontario Regulation 128/04, a municipal residential drinking water system must have a designated Overall Responsible Operator (ORO). The ORO must hold a valid operator certificate for the applicable type of subsystem, at a class equal to or higher than that of the subsystem.

The Bayshore Village Subdivision Drinking Water System is classified as a Water Distribution and Supply Class II (Certificate # 2353). The Overall Responsible Operator (ORO) is designated for the entire system. The Operator acting as the ORO is indicated in the electronic logbook on each day that entries are made and a record is maintained by the Operating Authority. The Operators designated as the ORO during the inspection review period held appropriate levels of certification.

Question ID	DWMR1078001	**Question Type**	Legislative

Legislative Requirement(s):
SDWA | O. Reg. 128/04 | 23 | (1); SDWA | O. Reg. 128/04 | 23 | (2); SDWA | O. Reg. 128/04 | 23 | (4); SDWA | O. Reg. 128/04 | 23 | (6); SDWA | O. Reg. 128/04 | 23 | (7);

Question:
When the overall responsible operator was unable to act, was a properly certified operator designated to act in their place?

Compliance Response(s)/Corrective Action(s)/Observation(s):
A properly certified operator was designated to act in place of the overall responsible operator.

Question ID	DWMR1074001	**Question Type**	Legislative

Legislative Requirement(s):
SDWA | O. Reg. 128/04 | 25 | (1);

Question:
Were operators-in-charge designated for all subsystems which comprise the drinking water system?

Compliance Response(s)/Corrective Action(s)/Observation(s):
Operators-in-charge were designated for all subsystems.

Pursuant to Subsection 25(1) of Ontario Regulation 128/04, one or more operators must be designated as Operators-in-Charge (OIC) of a municipal residential drinking water system. Subsection 25(5) further specifies that individuals holding only an Operator-in-Training

certificate are not eligible to be designated as OICs. The duties and responsibilities of an OIC are outlined in Section 26 of Ontario Regulation 170/03.

The Bayshore Village Subdivision Drinking Water System is classified as a Water Distribution and Supply Class II (Certificate # 2353). The Operators-In-Charge (OIC) are designated for the entire system. Additionally, operators participate in a rotating on-call schedule to ensure coverage for after-hours callouts.

Question ID	DWMR1075002	**Question Type**	Legislative

Legislative Requirement(s):
SDWA | O. Reg. 128/04 | 22;

Question:
Were all operators certified as required?

Compliance Response(s)/Corrective Action(s)/Observation(s):
All operators were certified as required.

Pursuant to Section 22 of Ontario Regulation 128/04, the owner or operating authority of a subsystem must ensure that every operator employed in the subsystem holds:
• (a) A certificate applicable to that type of subsystem; or
• (b) A certificate applicable to the subsystem, in the case of an operator holding a conditional certificate issued or renewed under Section 10.

A review of operator qualifications during the inspection confirmed that all operators employed to operate the Bayshore Village Subdivision Drinking Water Syestem hold appropriate and valid certification in accordance with these requirements.

Question ID	DWMR1076001	**Question Type**	Legislative

Legislative Requirement(s):
SDWA | O. Reg. 170/03 | 1-2 | (2);

Question:
Were adjustments to the treatment equipment only made by certified operators?

Compliance Response(s)/Corrective Action(s)/Observation(s):
Adjustments to the treatment equipment were only made by certified operators.

Pursuant to Subsection 1-2 (2), paragraph 5 of Schedule 1 of Ontario Regulation 170/03, adjustments to water treatment equipment must be made only by certified operators.

A review of pumphouse logbook entries for the inspection review period indicated that all adjustments to treatment equipment were carried out exclusively by certified operators, in accordance with this requirement.

Question ID	DWMR1058001	Question Type	Legislative

Legislative Requirement(s):
SDWA | O. Reg. 128/04 | 28;

Question:
Did operators and maintenance personnel have ready access to operations and maintenance manuals?

Compliance Response(s)/Corrective Action(s)/Observation(s):
Operators and maintenance personnel had ready access to operations and maintenance manuals.

Section 28 of Ontario Regulation 128/04 requires that the owner or operating authority of a subsystem shall ensure that operators and maintenance personnel in the subsystem have ready access to the comprehensive operations and maintenance manuals that contain plans, drawings and process descriptions sufficient for the safe and efficient operation of the subsystem.
Operation and maintenance manuals and contingency plans for the Bayshore Village Subdivision Drinking Water System are available at the treatment building, at the office and are also available electronically.

Question ID	DWMR1059001	Question Type	Legislative

Legislative Requirement(s):
SDWA | O. Reg. 128/04 | 28;

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

Compliance Response(s)/Corrective Action(s)/Observation(s):
The operations and maintenance manuals contained plans, drawings, and process descriptions sufficient for the safe and efficient operation of the system.

The subjects addressed and the level of detail provided within the Bayshore Village Subdivision Drinking Water System operations manual and associated contingency plans are considered sufficient to support the safe, reliable, and efficient operation of the drinking water system. This assessment is based on a review of operator logbooks, operational and monitoring data, and findings observed during the inspection review period. The documentation reflects appropriate consideration of regulatory requirements under Ontario Regulation 170/03 and demonstrates consistency with established industry best practices. The manual includes defined operating procedures, process control and monitoring requirements, preventative maintenance activities, and system-specific operational parameters. In addition, the contingency plans outline appropriate response actions for reasonably foreseeable adverse conditions, including equipment malfunctions, loss of treatment capability, and water quality exceedances. Overall, the available documentation provides operators with adequate technical guidance to maintain system performance, ensure regulatory compliance, and protect drinking water quality.

Question ID	DWMR1060002	Question Type	Legislative

Legislative Requirement(s):
SDWA | 31 | (1);

Question:
Did the operations and maintenance manual(s) meet the requirements of the Municipal Drinking Water Licence?

Compliance Response(s)/Corrective Action(s)/Observation(s):
The operations and maintenance manual(s) met the requirements of the Municipal Drinking Water Licence.

Pursuant to Condition 16.2 of Municipal Drinking Water Licence 147-104 (Issue 4), the Operations Manual for the Bayshore Village Subdivision drinking water system must include the following elements:

• 16.2.1: The requirements of the licence and associated procedures;

• 16.2.2: The requirements of the Drinking Water Works Permit;

• 16.2.3: A description of the processes used to achieve primary and secondary disinfection, including:
a) CT calculations used under worst-case operating conditions;
b) Validated operating conditions for UV disinfection equipment, including the validation certificate (if applicable);

• 16.2.4: Procedures for monitoring and recording in-process parameters necessary for treatment control and performance assessment;

• 16.2.5: Procedures for the operation and maintenance of monitoring equipment;

• 16.2.6: Contingency plans and procedures for ensuring adequate equipment and materials during emergencies, upsets, or equipment failures;

• 16.2.7: Procedures for managing and documenting complaints related to the drinking water system;

• 16.2.8: An inspection schedule for all wells, including production, standby, test, and monitoring wells;

• 16.2.9: Well inspection and maintenance procedures for all above- and below-grade components;

• 16.2.10: Remedial action plans for addressing non-compliance or risks to raw well water quality identified during inspections.

The Operations Manual for the Bayshore Village Subdivision Drinking Water System appears to include all required elements as prescribed.

Question ID	DWMR1064001	Question Type	Legislative

Legislative Requirement(s):
SDWA | O. Reg. 128/04 | 26 | (2);

Question:
Did an operator-in-charge ensure that records were maintained of all adjustments to the

processes within their responsibility?

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

The operator-in-charge ensured that records were maintained of all adjustments to the processes within their responsibility.

Subsection 26. (2) of Ontario Regulation 128/04 requires that an operator-in-charge shall ensure that records are maintained of all adjustments made to the processes within his or her responsibility and ensure that all equipment used in the processes within his or her responsibility is properly monitored, inspected, tested and evaluated and that records of equipment operating status are prepared and available at the end of every operating shift.
During the inspection review period the Operators-in-Charge (OIC) met the requirements of subsection 26(2) of Ontario Regulation 128/04 by implementing and maintaining comprehensive operational records and oversight practices within their area of responsibility.
Specifically, the OIC ensured that all process adjustments were documented, such as recording changes to chlorine dosage, including the date, time and revised dosage rates. Adjustments to treatment processes, such as adjusting duty and standby pumps were also recorded in operational logs.
The OIC further demonstrated compliance by ensuring that all equipment was properly monitored on an ongoing basis. This included maintaining logs of key operational parameters such as pump run times, system flows, pressures, reservoir level, and chemical feed rates, supported by SCADA data where applicable. Routine inspections were carried out and documented through checklists noting the condition of pumps, valves, tanks, and any observed leaks or alarm conditions.
In addition, the OIC ensured that equipment was regularly tested and evaluated. This was demonstrated through records of analyzer calibrations (e.g., chlorine and turbidity), including documented results, any corrective adjustments such as changing electrolyte or cleaning, and confirmation that instruments met acceptable performance criteria.
Records were maintained in accessible formats—either in the treatment building on spreadsheets or electronic logbooks or on the SCADA systems—and were available for review, ensuring continuity between shifts and supporting regulatory compliance.

Question ID	DWMR1062001	**Question Type**	Legislative

Legislative Requirement(s):
SDWA | O. Reg. 170/03 | 7-5;

Question:

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

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

Records or other record keeping mechanisms confirmed that operational testing not performed by continuous monitoring equipment was done by a certified operator, water quality analyst, or person who met the requirements of Schedule 7-5 of O. Reg. 170/03.

Pursuant to Subsection 7-5 (1) of Schedule 7 of Ontario Regulation 170/03, chlorine residual and turbidity tests that are not performed using continuous monitoring equipment must be conducted by a certified operator or a certified water quality analyst.
A review of records from the inspection review period confirmed that all manual chlorine residual and turbidity tests were performed by certified operators, in accordance with the regulatory requirements.

Question ID	DWMR1063001	Question Type	Legislative

Legislative Requirement(s):
SDWA | O. Reg. 170/03 | 6-10 | (1);

Question:
For every required operational test and sample, was a record made of the date, time, location, results, and name of the person conducting the test?

Compliance Response(s)/Corrective Action(s)/Observation(s):
For every required operational test and sample, a record was made as required.

Section 6-10 of Schedule 6 of Ontario Regulation 170/03 states that the owner of a drinking water system and the operating authority for the system shall ensure that, for every sample required by this Regulation or by an approval, municipal drinking water licence or order, a record is made of the date and time the sample was taken, the location where the sample was taken and the name of the person who took the sample. Where appropriate, such as for pH or chlorine tests, the result of the test must also be recorded.
During the inspection review period required records were maintained for operational tests and samples through a variety of record keeping mechanisms including plant logbooks, sample submission forms and spreadsheets.

Question ID	DWMR1061001	Question Type	Legislative

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

Question:
Were logbooks properly maintained and did they contain the required information?

Compliance Response(s)/Corrective Action(s)/Observation(s):
Logbooks were properly maintained and contained the required information.

Section 27 of Ontario Regulation 128/04 requires that the owner or operating authority of a subsystem shall ensure that logs or other record-keeping mechanisms are provided to record information concerning the operating of the subsystem. Entries in the logs shall be made chronologically and only be made by authorized persons. It must be unambiguous who made the entry in the logbook.
An operator-in-charge or a person authorized by an operator-in-charge shall record the

following information in the logs or other record-keeping mechanisms in respect of each operating shift:
1. The date, the time of day the shift began and ended and the number or designation of the shift.
2. The names of all operators on duty during the shift.
3. Any departures from normal operating procedures that occurred during the shift and the time they occurred.
4. Any special instructions that were given during the shift to depart from normal operating procedures and the person who gave the instructions.
5. Any usual or abnormal conditions that were observed in the subsystem during the shift, any action that was taken and any conclusions drawn from the observations.
6. Any equipment that was taken out of service or ceased to operate during the shift and any action taken to maintain or repair equipment during the shift.
The Operating Authority for Bayshore Village Subdivision Drinking Water System maintains the required information through a variety of record keeping mechanisms. Operators use electronic logbooks to record notes about activities undertaken in the treatment subsystem and distribution subsystem, including who is acting as the Overall Responsible Operator and the Operator-In-Charge. A variety of spreadsheets are also used to record data such as flow rates, chlorine residuals, CT, turbidity readings, distribution chlorine residuals and pressure, chemical levels, amount of chlorine used and if there were any critical alarms.

Question ID	DWMR1065001	**Question Type**	Legislative

Legislative Requirement(s):
SDWA | O. Reg. 128/04 | 27 | (6);

Question:
Were logs and other record keeping mechanisms available for at least five (5) years?

Compliance Response(s)/Corrective Action(s)/Observation(s):
Logs or other record keeping mechanisms were available for at least five (5) years.