

## Implementer Assessment Report Consultation Comments

From	AR	Comment	Response	Action
MOECC	LTVSPA	<p>1) Page 4.2- Sec 4.1: "<b>Peer review</b> for work initiated following the completion of the peer review process, including the IPZ-3 work, was provided by <b>technical staff</b> at the Ministry of Environment and Climate Change,...".</p> <ul style="list-style-type: none"> <li>Please re-word this sentence to reflect that MOECC staff helped the SPAs to understand the technical requirements and science. MOECC cannot peer-review technical work and approve it at the same time- this is a conflict of interest.</li> </ul>	Agreed, we should revise to more accurately describe the MOECC role.	Revise wording as suggested
MOECC	LTVSPA	<p>2) Page 4-12- Sec. 4.2.5.1</p> <ul style="list-style-type: none"> <li>This section needs to mention that the delineation of the EBA (15,000L) encompasses all components of IPZs for the Wheatley intake, as indicated in Essex UAR. Similar wording used for Stoney Point can be used here.</li> </ul>	Agreed, we should revise as requested.	Revise as suggested
MOECC	LTVSPA	<p>3) Page 4-13: "<i>The spill location is shown on <b>Map 4-3b</b></i>".</p> <ul style="list-style-type: none"> <li>This map does not show the spill location. Please update the map or refer to the location mapped in Essex UAR.</li> </ul>	Agreed we can add the spill locations from ERCA. to Map 4-3b.	Revise mapping to show spill location
MOECC	LTVSPA	<p>4) Page 4-14- Sec. 4.2.5.2: "<i>The modelling completed for the <b>Wheatley IPZ-3</b> followed the general approach outlined in the MOE Technical Bulletin (July 2009).</i>"</p> <ul style="list-style-type: none"> <li>This should read "...completed for Stoney Point IPZ-3..." This section is for the Stoney Point Intake, not the Wheatley Intake.</li> </ul>	Agree this should be corrected	Revise as suggested
MOECC	LTVSPA	<p>5) Page 4-17, 1<sup>st</sup> paragraph</p> <ul style="list-style-type: none"> <li>Please mention that the regulation limits were not used for the IPZ-3 delineation based on the SPC request and the Director's approval letter (Include in Appendix).</li> </ul>	Agreed the suggested text can be added and the Director's approval letter should replace our letter which was included as a placeholder for the director's letter not yet received	Revise as suggested
MOECC	LTVSPA	<p>6) Page 4-18, 2<sup>nd</sup> paragraph: it states "<i>transport pathways <b>were not considered in the EBA delineations</b></i>".</p> <ul style="list-style-type: none"> <li>This statement is a bit misleading because the EBA encompasses IPZ-1, 2 and 3 completely, i.e. the EBAs include all components of the IPZs. On page 4-19 (Area Vulnerability factor for IPZ-3 for Stoney Point), it states that the upland areas of IPZ-3 are agricultural areas and most of the area is tile drained. Tile drainages are transport pathways. Therefore, to clarify, please re-word the statement above or remove the term transport pathways.</li> </ul>	Revise the statement to provide more clarity that transport pathways such as agricultural tile draining was not use to extend IPZ-3 as was done for IPZ-2.	Revise as per response

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MOECC	LTVSPA	7) Page 4-22, top paragraph: <i>“Similarly, even though intakes on Lake St. Clair are considered <b>Type C</b> and not Great Lakes intakes, the Vulnerability Scores start at 6.3 and decrease from there.”</i> <ul style="list-style-type: none"> <li>• Lake St. Clair Intakes are type D intake, not C.</li> <li>• Correct typo for “Similarly”</li> </ul>	Agreed these errors should be corrected	Revise as suggested
MOECC	LTVSPA	8) Page 7-14, Sec. 7.1.2 <ul style="list-style-type: none"> <li>• Please include a statement or a table to show that the local threats approved by the director can result in low or moderate threats based on the vulnerability scores assigned with each IPZ. This statement or table would complete and align with the last statement that Event Based modelling would be used to identify local threats as SDWT.</li> </ul>	The tables in A-10 indicate where the local threat is a significant, moderate or low threat. An additional statement can be added to indicate that the local threat has been added to the tables in A-10 and indicates where the local threat may be considered a significant, moderate or low threat. This paragraph should also be updated to reflect that the director’s letter was received and is included in appendix 13.	Revise as suggested in response
MOECC	LTVSPA	9) Map 7-8 <ul style="list-style-type: none"> <li>• The table attached with this map indicates that SDWTs are identified in IPZ-1s and 2s scored 6 and lower for chemical and pathogen threats. These scores would/could result in moderate and low threats only; the EBA part of the map is correct. Please re-arrange this table to avoid any confusion.</li> <li>• Options include using the same table as used for Stoney Point Intake (map 7-9) OR mentioning that SDWT are only identified for fuel threats in the EBA.</li> </ul>	Revise the table included in the map to indicate no significant threats in IPZ-1,2 as the EBA indicates where modelled significant threats may be identified. This is consistent with the way these threats have been dealt with in map 7-9 and in the SCR AR.	Revise map as noted
MOECC	LTVSPA	10) IPZ-3 segments for Stoney point have vulnerability scores less than 8 which means no SDWT can be identified. However, managed land, livestock density and % of impervious areas etc. still need to be calculated, as required by the rules, which would result in low and moderate threats. The UAR indicates that the calculations were not completed and will be in the future; this has been assigned as a data gap (Sec. 7.4).	The comment does not suggest that this needs to be corrected before approval. If necessary staff can work with MOECC to determine the appropriate time to undertake this work. If it needs to be completed before submission it will delay the submission of this AR for approval.	Determine when it would be appropriate to fill this gap.
MOECC	SCRSPA	1) Page 7-13, Sec. 7.1.2 <ol style="list-style-type: none"> <li>1. Please include a statement or a table to show that the local threats approved by the director can result in low or moderate threats based on the vulnerability scores assigned with each IPZ. This statement or table would complete and align with the last statement that Event Based modelling would be used identify local threats as SDWT.</li> </ol>	The tables in A-10 indicate where the local threat is a significant, moderate or low threat. An additional statement can be added to indicate that the local threat has been added to the tables in A-10 and indicates where the local threat may be considered a significant, moderate or low threat.	Revise as suggested in response
MOECC	SCRSPA	2) Table 7-6 and Table 7-10 <ol style="list-style-type: none"> <li>2. Please insert the asterisk (*) for IPZ-1 and 2 as well. The</li> </ol>	Add additional asterisks as suggested	Revise as suggested

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		way it is shown now may indicate that the EBA is limited only to IPZ-3, but it actually encompasses all IPZs. The way table 7-8 is shown would work for table 7-6. Same comment applies to table 7-10.		
MOECC	SCRSPA	<p>3) Maps 4-4c (Transportation of Fertilizer [ToF] Local threat) for Wallaceburg</p> <p>3. ToF has been approved as a local threat, Director's approval letter dated Sept 2011, where Nitrogen (N) in the form of Nitrate (NO<sub>3</sub>) is the parameter of concern under the condition that fertilizer contains NO<sub>3</sub> as Urea Ammonia Nitrate. A spill of ToF (modelled), as shown in the consultant report, resulted in identification of SDWT at specific locations mapped in map 4-4c. This identification was based on, as stated in the consultant report, the ODWS for Nitrite (NO<sub>2</sub>) instead of Nitrate (NO<sub>3</sub>). The ODWSs for NO<sub>3</sub> and NO<sub>2</sub> are 10mg/l and 1mg/l, respectively. Given the consultant modelling results, the locations mapped in map 4-4c would not result in a SDWT if the NO<sub>3</sub> threshold was used. Please clarify and revise where necessary to address the comment.</p>	<p>The differences between nitrate and nitrite should be adequately documented in the AR including the volumes which result in exceedances for each parameter. While we have requested that the province consider adding nitrite to the director's letter and also allowing it to be used for the storage and handling, they have indicated that currently only nitrate is considered and that further review has not yet occurred. Staff are not optimistic that this will change prior to AR approval. Thus two options are presented for SPC consideration:</p> <ol style="list-style-type: none"> <li>1. Document that the activity at the volumes analysed are not SDWT as they did not result in an exceedance of nitrate.</li> <li>2. Document the larger quantity (currently estimated to be 3x larger but requiring more detailed calculations) which would result in a SDWT</li> </ol> <p>With either option, if MOECC allows nitrite to be considered the AR would have to be revised to document the smaller quantity before approval of the AR.</p>	To be determined by SPC
MOECC	UTRSPA	<p>Please make sure that the submitted UAR:</p> <ol style="list-style-type: none"> <li>1) Includes all technical and scientific rationale that supports the delineation of Issue Contributing Areas.</li> </ol>	<p>We believe that this has been done. The technical report prepared by Matrix has been summarized in section 5.6. Additional detail is available in the technical report which was provided to MOECC upon request. When more specific comments are received indicating what if any information was not copied over to the AR staff will work with MOECC to determine appropriate revisions which will facilitate approval.</p>	None at this time
MOECC	UTRSPA	<ol style="list-style-type: none"> <li>2) Lists and enumerates all existing threats within the ICA that are contributing to the Nitrate Issue.</li> </ol>	<p>Table 7-26a lists and enumerates threats in the ICA which contribute to the Issue.</p>	None at this time

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MOECC	UTRSPA	3) Lists all drinking water threats that contribute or would contribute to the Nitrate Issue within the ICA.	Add a bulleted list or table to indicate all those prescribed drinking water threats which list Nitrogen as a chemical of concern. This is included in Oxford's report table 1.1 and in addition to those inventoried in the ICA it would include waste disposal, snow storage, NASM application and storage	Include Table 1.1 from the Oxford ICA threats report in section
UTRCA	SCRSPA LTVSPA	It would be helpful if the Significant Threat Policy Applicability Mapping for Intake Protection Zones were updated to show the EBA volumes. This could be done by adding a different solid colour for each of the volumes, behind the cross hatching of the EBA. Unfortunately the other SDWT areas (red and orange) would need to be on top of this layer, but they are relatively small areas compared to the other parts of the EBA.	Mapping is provided in section 4 (ie maps 4-Xa, b, c which shows each EBA separately. In order to revise as suggested, we would also need to differentiate between fuel and fertilizer in the SCRCA. This would also not adequately represent that the EBAs overlap and policy applies to multiple quantities (although the lowest could be represented).	None
UTRCA	UTRSPA LTVSPA	-UTRCA AR Table 7-26a is not in List of Tables in Table of Contents -check that Table of Contents in all documents have been updated -LTVCA AR Table 7-12, 7-14, 7-15 not in List of Tables in Table of Contents	Agree missing tables should be added to the lists of tables	Revise and regenerate list of tables
SCRCA	SCRSPA	Map 4-1 needs to be updated to include the new EBA	This revision was able to be included in the AR before it was posted for consultation.	none
MNRF	UTRSPA	Page 13-4 <ul style="list-style-type: none"> <li>This section refers to the peer review process and should be updated to reflect the current status of this work. The Tier 2 water budget is complete and has been signed off by the peer review committee as has the Tier 3 assessment.</li> </ul>	Revise as suggested	Revise
MNRF	UTRSPA	Page 3-16 <ul style="list-style-type: none"> <li>The second paragraph on this page would benefit from some clarification in the wording with respect to scenarios being run for each tier. Specifically, the wording related to the Tier 3 scenarios should be clarified to reflect the updated version of the technical rules. MNRF/MOECC can provide some suggestions for wording.</li> </ul>	Revise with wording provided by MNRF/MOECC	Revise
MNRF	UTRSPA	Page 3-22 <ul style="list-style-type: none"> <li>The map reference is incorrect in first paragraph. Reference should be made to Map 3-7 instead of Map 3-6.</li> </ul>	Revise as suggested	Revise
MNRF	UTRSPA	Page 3-24 <ul style="list-style-type: none"> <li>The typo in first paragraph "draught" should be 'drought'</li> </ul>	Revise as suggested	Revise
MNRF	UTRSPA	Page 3-24 <ul style="list-style-type: none"> <li>In the final paragraph of Section 3.4.2, the statement "As a result, the Local Area was assigned a Low risk level" should be revised to "... the Local Areas were ...".</li> </ul>	Revise as suggested	Revise

From	AR	Comment	Response	Action
MNRF	UTRSPA	<p>Section 3.4.2</p> <ul style="list-style-type: none"> <li>Overall this section is a high level summary of the Tier 3 Assessment with references back to the Tier 3 Local Area Risk Assessment reports which have been made available in their entirety. This UAR section would benefit from clarification by including some additional key information to help the reader understand the Tier 3 assessment. Some items to consider including are:</li> <li>A description/definition of WHPA-Q1 and WHPA-Q2 as they are the vulnerable areas (text from Matrix 2014 report)</li> <li>A table of the scenarios that are undertaken in the Tier 3 Assessment (Table 4.1 from Matrix 2014 report)</li> <li>A reference to Map 3-7 that shows the locations of the Local Area Assessments</li> <li>A table of results of the scenarios (Table 4.4 from the Matrix 2014 report)</li> </ul>	Revise as suggested	Revise