

Drinking Water Testing

Administrative Procedure

Topic:	Drinking Water Testing
Status:	Active
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Responsibility:	Superintendent of Facility Services and Planning

Intended Purpose

Ontario Regulation 243/07 – Schools, Private Schools and Child Care Centres, outlines the provincial lead exceedance threshold, flushing, and testing requirements for all schools, private schools and Child Care Centres. In 2017, the Ministry of the Environment, Conservation and Parks (MECP) amended the Regulation; changing the testing requirements from an annual test of a facility's plumbing system, to testing every fixture designated for consumption (drinking water or for use of food preparation) in a school. The Ontario drinking water standard for lead is 10 micrograms per litre.

The intent of the Regulation is to provide increased protection for children, especially children under the age of seven (7) years, who are particularly vulnerable to the effects of lead. For the purposes of this Regulation, a school is open on a day if, at any time during that day, programs for children under eighteen years of age are held at the school.

The Ministry of Education issued a letter to all Directors of Education on October 2, 2017, regarding Safe Drinking Water in Schools and Child Care Centres, detailing expectations for boards “to communicate with parents and guardians, in a timely manner of all situations where a lead exceedance has been detected in the drinking water of a school or child care, and how the exceedance will be

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addressed". The Halton District School Board fulfills this expectation by the following:

- As per the Regulation, test results of a lead exceedance are emailed to the MECP and the Halton Region Public Health Department, as well as the Spills Action Centre within the mandated 24 hours;
- The school Principal, Head Custodian, Facility Services staff, including the Area Supervisor are sent an email containing the Ministry Notice of Exceedance form and details of any immediate actions prescribed by the Halton Region Health Department;
- The majority of the testing occurs during the summer, a template letter is provided to Principals to send to parents/guardians and staff prior to the start of school, advising them of an exceedance, the corrective action, and providing links to other information;
- The Annual Drinking Water report is presented to the Board in the Fall and the information, including the water test results for each school, are posted on the Facility Services department webpage, under Drinking Water Testing;
- The Board maintains information and links to the MECP's website on the Drinking Water testing website, along with links to previous Annual Drinking Water reports and a section with Frequently Asked Questions (FAQ);
- Where there is a "flushed" water exceedance above the MECP threshold, one or more of the following corrective actions will be implemented:
 - increase flushing and re-test;
 - replace the fixture and/or replace the plumbing that supplies water to the fixture, or remove the fixture, if there are other suitable;
 - fixture will remain non-operational until flushed test result is below the Ministry threshold.

In accordance with Ontario Regulation 243/07, the following provisions will be undertaken:

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- All schools must be flushed **every week** that the school is open for programming to students under the age of 18. This applies to all elementary and secondary schools;
- In the event of a lead exceedance, the school's plumbing and all fixtures designated for consumption must be flushed **every day** that school is open, for two years. This applies to all elementary and secondary schools.
- A flushing log will be maintained weekly and/or daily in accordance with the Regulation;
- Water samples are to be taken annually between May 1st and October 31st, and tests are to be performed by a certified third party laboratory;
- Each school shall ensure flushing records and test results are publicly available; and
- Each school shall ensure flushing records and test results are kept for six (6) years.

A full copy of the Regulation can be viewed at <http://www.e-laws.gov.on.ca>

Procedures

1. **Facility Services** shall manage and co-ordinate the requirements as detailed in Ontario Regulation 243/07, and provide support and resources to all School Administrators and caretaking staff, as detailed below:
 - 1.1. coordinate testing of designated fixtures, including when a fixture has been replaced;
 - 1.2. manage all corrective action as directed by the Halton Region Health Department;
 - 1.3. inform any child care and summer camp program located in a school of a lead exceedance and the corrective action within 24 hours of receiving the information;
 - 1.4. communicate the school's flushing protocol to any municipal partners that are within or attached to a school building, (e.g. library, swimming

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pool) on an annual basis. Note: community centres do not fall under Reg. 243/07;

- 1.5. provide School Administrators with a Ontario Regulation 243/07 Program Water Binder in order to maintain the school flushing logs, annual test results, and the information prescribed by the Regulation;
 - 1.6. review the Water Binder and the flushing protocol at the start of the school year with the school administrators or when there is a change of principal at the school;
 - 1.7. review the information in the Water Binder monthly and update the information as required if fixtures are removed or changed, in accordance with the Regulation;
 - 1.8. present the water test results for each school, to be posted on the HDSB web site, under Departments, Facility Services;
2. **Caretaking Staff** will use the information provided in the Water Binder, which identifies the designated water drinking/consumption fixtures and the end-of-line fixtures, to be flushed daily or weekly in accordance with Regulation 243/07. In addition, the Head Caretaker will ensure the following:
- 2.1. undertake daily or weekly flushing of the designated fixtures at the start of the morning shift, prior to students/staff entering the building;
 - 2.2. ensure that signage is posted and maintained identifying those fixtures that are not for consumption - currently identified with a "hand-washing only" sign;
 - 2.3. review the Water Binder and flushing protocol of designated fixtures annually with the school administrators;
 - 2.4. maintain daily or weekly flushing logs as required and file the logs (currently these are paper copies) in the school's Water Binder.
3. **School Administrators** will be informed of any lead exceedance test result within 24 hours by email. If there has been an adverse lead result at the school,

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the principal will be responsible for sending a letter to parents/guardians and staff at the start of the school year advising the school community of this and corrective action that will be undertaken. A template letter will be provided by the Communications and Engagement Department. The template letter provides links to MECP information as well as to the HDSB [Drinking Water](#) web page.

School administrators shall review the information in the Water Binder annually with Facility Services staff and the Head Caretaker, and communicate to staff, students and community partners (child care) at the beginning of the school year, or when there are any changes, which fixtures are designated for drinking or food preparation. As per Regulation 243/07, the Water Binder is to be made available to the public upon request. Any questions regarding the school or HDSB drinking water testing may be submitted to the Facility Services Compliance Supervisor.

4. Fixtures designated for consumption, and therefore to be tested in accordance with the Regulation, are as follows:
 - 4.1. **Elementary schools** – All drinking fountains and bottle filling stations, staff room sinks, sinks located in serveries or kitchens, all classroom and hallway sinks (excluding design and technology rooms, science rooms and art rooms, washroom sinks or Bradleys or sinks that are designated specifically for hand-washing);
 - 4.2. **Secondary Schools** - All drinking fountains and bottle filling stations, staff room sinks, sinks located in serveries or kitchens, sinks located in music rooms. Sinks in specialty program rooms such as technology, drama, library, art, science and individual classrooms are not tested.
5. **Schools that are not on municipal water** - as above, however, in addition to the annual testing for lead, these schools fall under Ontario Regulation 170/03

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and accordingly, are tested monthly for microbiological contaminants. If there are any adverse results, the school is informed immediately and bottled water is provided until the system has been cleaned and re-tested, and shows zero (0) contaminants. These schools include Brookville, Killbride and Pineview PS

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Reference number: Pending

Cross-Reference:

Legislation

Safe Drinking Water Act, 2002, S.O. 2002, c. 32

O. Reg. 243/07: Schools, Private Schools and Child Care Centres

O. Reg. 170/03: Drinking Water Systems

Ministry Policy & Program Memoranda

N/A

Board Policies, Procedures & Protocols

N/A

Revision History

Style template updated January 2024 (Administrative Procedure Update Report 24010); prior revision history not recorded.