Drinking Water Haulage Guidance Document

This document is in support of the Safe Water Program, Drinking Water Protocol

Environmental Health Branch Public Health Division Ministry of Health and Long-Term Care December 2008



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This guidance document is intended to support boards of health in inspecting drinking water haulage vehicles. This document is not intended to provide legal advice or to be a substitute for the professional judgment of medical officers of health or local board of health staff. Board of health staff should consult with legal counsel as appropriate.

Preamble

Drinking water haulage vehicles often supply water to homes in rural areas serviced by cisterns or shallow wells with poor or unreliable water yield. Hauled drinking water is also relied upon in emergency situations by municipalities, businesses and homes in cases where a risk to public health has been associated or identified in drinking water supplies.

1 Purpose

This document is referenced in the Drinking Water Protocol, under the Safe Water Program of the Ontario Public Health Standards. Specifically, under Section 1 d) of the Drinking Water Protocol, boards of health are required to inspect drinking water haulage vehicles annually, and in so doing, are directed to refer to the most current version of the Drinking Water Haulage Guidance Document for information.

The purpose of this document is to provide guidance to assist local public health units in assessing potential health risks associated with drinking water obtained, transported and delivered in bulk containers, such as tanker trucks or drums.

It is recognized that there are currently no regulatory requirements under the *Health Protection* and *Promotion Act* (HPPA) pertaining to the operation of water haulage vehicles. This document therefore outlines factors for public health inspectors to consider in carrying-out their inspection functions, to prevent and reduce water-borne illness related to drinking water. An educational approach with the owners/operators of these vehicles should be encouraged; however, public health inspectors can always act on *health hazards* identified in connection with water haulage vehicles in accordance with the HPPA.

2 Guidance for Public Health Inspectors

The following factors related to the operation of water haulage vehicles should be considered by public health inspectors while carrying-out their inspection functions of these vehicles. The public health inspector should check whether the owner or operator of the water haulage vehicle:

- 1. Obtains drinking water from a supply that complies with the requirements of Ontario Regulation 169/03 (Ontario Drinking Water Standards).
- 2. Takes appropriate measures to protect the tank, equipment and connections from becoming contaminated during storage, filling, transportation and delivery of the drinking water.
- 3. Ensures that any article or piece of equipment that is used for the distribution of drinking water is:
 - i. of sound and tight construction;
 - ii. kept in good repair;
 - iii. made of surfaces that can be readily cleaned and sanitized (where drinking water comes in direct contact);
 - iv. are corrosion-resistant and non-toxic; and

- v. free of cracks, crevices and open seams.
- 4. Ensures that the inlets or openings of containers used for water haulage are constructed and maintained in a manner that will prevent the entry of insects, rodents, or any foreign material that may contaminate the water. With the exception of instances where cleaning, emptying or filling of the tank is occurring, inlets or openings should be covered and sealed at all times.
- 5. Ensures that, where lubricants are used that may come in contact with the water, the lubricants are of such quality that the lubricants do not contaminate the water or cause a health hazard.
- 6. Ensures that bulk containers have not been previously used to transport any substance other than water and are cleaned and sanitized prior to transporting potable water.
- 7. Ensures that bulk containers are clearly and appropriately labeled, i.e., "Drinking Water" or "Potable Water"; "Water Not Safe for Drinking" or "Non-Potable Water".
- 8. Ensures that surfaces with which drinking water comes in direct contact are cleaned and sanitized as often as is necessary to maintain them in a clean and sanitary condition.

2.1 Sanitizing a Bulk Water Container

The public health inspector should check that all surfaces are washed or scrubbed with a detergent solution, rinsed with clean water and,

- (a) sprayed or rinsed with hot water or steam in a manner that creates a temperature of not less than 82° Celsius on the treated surface; or
- (b) sprayed or rinsed with a chemical solution as follows:
 - i. immersion in a clean chlorine solution of not less than 200 parts per million of available chlorine at a temperature not lower than 24° Celsius for at least fortyfive seconds;
 - ii. immersion in a clean quaternary ammonium compound solution of not less than 400 parts per million at a temperature not lower than 24° Celsius for at least forty-five seconds;
 - iii. immersion in a clean solution containing not less than 25 parts per million of available iodine at a temperature not lower than 24° Celsius for at least forty-five seconds; or
 - iv. immersion in any solution containing a sanitizing agent that is non-toxic and that provides a bactericidal result not less than the result provided by clause (i), (ii) or (iii) and for which a convenient test reagent is available.

Note:

- One should never enter a tank without first consulting with the Ministry of Labour to determine whether 'confined space' precautions are required. .
- The solution and rinse water should be disposed of in a manner that does not adversely affect the environment.

2.2 Sampling and Record Keeping

The public health inspector should check whether the owner or operator of a water haulage vehicle:

- 1. Collects samples for microbial quality of hauled water that is intended for human consumption at the point of delivery. Water samples should be collected and tested with reference to the Ontario Water Quality Standards for microbiological quality, at least once every three months of operation per year.
- Considers sampling and testing for other chemical or radiological parameters, which will depend largely on the source supply, in consultation with the local public health unit. See Section 3 of this document.
- 3. Maintains a logbook that records:
 - a. The date, time and location of each occasion where the tanker is filled;
 - b. The chlorine residual (if applicable) of the water at the time of filling from the drinking water system;
 - c. The date, time and location of each water delivery;
 - d. The volume of water delivered to each location;
 - e. The date and time when equipment was cleaned and sanitized;
 - f. Water sample results;
 - g. Comments about problems that may have been encountered with the source water supply, (i.e., unusual water colour or odour), water haulage vehicle, and any equipment used in the operation
- 4. Keeps the activity logbook for a period of not less than two years.

3 Source Water Supply

An important consideration in assessing the potential risks of the drinking water transported by hauled vehicles is the security and the quality of the source supply. Ideally, source water supplies should be those that are regulated under the *Safe Drinking Water Act* (O. Reg. 170/03) or under the HPPA (O. Reg. 318/08 or O. Reg. 319/08). Public health inspectors should encourage owners and operators of these drinking water systems to consult with MOE or the local health unit to determine any implications of supplying water to hauling businesses.

Public health inspectors should assess source water supplies that are not regulated supplies to determine the quality of the water and suitability to be used for human consumption. Where a public health inspector determines that a drinking water supply system being used to supply water haulage operations is not suitable, action should be taken to reduce the risk of water-borne illness.

4. Other Non-Potable Uses of Hauled Water

In the course of their duties, public health inspectors may be required to investigate public health issues related to the use of non-potable water. For example, some water hauler operations supply water for filling private swimming pools as well as a number of other

recreational or commercial uses. In situations where public health concerns are reported in relation to non-potable uses, public health inspectors should respond in accordance with procedures to assess potential health hazards.

5. Enforcement

Where a public health inspector determines that a condition (at source, in storage, transport or delivery) constitutes a health hazard as defined in the HPPA, the issuance of an order under section 13 of the HPPA should be considered.

Appendix A – Glossary

"Contamination" means the presence of hazards in the drinking water that can be harmful to humans. Hazards may be microbiological, chemical or physical in nature.

"Sanitizing" means antimicrobial treatment and "sanitize" has a corresponding meaning.

Appendix B – References

Haldimand-Norfolk Health Unit, (2002). Water Haulers – Safe Drinking Water

Halton Regional Health Unit, (1992). Drinking-Water Haulage Guidelines

Mistahia Health Unit, Alberta Regulation 240/85 – Health Standards For Bulk Water Hauling

York Region Health Services, (2002). Water Haulers – Sampling and Inspection Protocol, Health Protection Division Policy and Procedures Manual.

Appendix C - Sample Tools

The attached appendices are sample tools that local boards of health may wish to use to assist water haulage operations in ensuring the provision of safe water.

- C.1 Water Haulage Inspection Checklist
- C.2 Daily Activity Log Sheet

Appendix C.1 – Water Haulage Inspection Checklist

Bulk Water Hauler Information 1. Establishment #: 2. Company Name: 3. Address: 4. Owner: 5. Telephone #: 7. Truck Driver Name: 6. Licence Plate: 8. Purpose(s) of bulk water: ☐ Drinking Water Cistern **Swimming Pool** Other (*please specify*) **Water Source Information:** 9. Drinking-Water System Information: Name: Location: Waterworks # (if applicable): 10. Free Available Chlorine Residual at the time of sampling: (minimum 0.05 ppm) ppm 11. Description of Source Water Supply (ie: municipal, private well, etc.) Vehicle and Equipment Standards: 12Tank Capacity: 13Tank Contact Surface Stainless Steel Fiberglass Plastic Other(*please specify*): Note: Tank contact surface must be made of food-grade material. Contact surface must not be

painted nor consist of other toxic/non-food grade metal or coating

14.Presence of drain at bottom:	Yes	☐ No							
15The following items are corrosion food-grade contact surface:	resistant, readily access	sible for cleaning and sani	tizing, and have a						
Bulk Water Tank Yes□ No	□ Equipment	Yes \square No \square							
Hose(s) Yes \square No	Pump(s)	Yes □ No □							
16Has the truck been used for transp Yes	lo 🗌	•	ng bulk water?						
18Are all openings and vents constru									
Yes No L									
19Are inlet and outlet connections properties No	rotected from contamina	ation of potable water at a	ll times?						
20 Is the maintenance hole large enough for a person to enter for inspection? Yes No									
21 if the answer is Yes to question 20 is there a confined space entry safety program in place?									
Yes □ No □									
22 Are chemical products used to cle	ean, sanitize/disinfect th	e bulk water tank:							
23 Exterior condition of the truck an	d equipment								
Sanitary: Yes	No 🗌								
Rusted: Yes	No								
In good repair: Yes	No 🗌								
Other:									
24 bulk containers are clearly and appropriately labeled?									
Yes □ No □									
25 operator training provide	ed by the employer for v	vater tank maintenance an	d sanitation?						
Yes No									

Water Sampling and Record Keeping

	26	sampling for hauled		least every 3 months on the least every 3 months on the least every 3 months of the least every 4 months every 4 month	of operation	per yea	r for mi	crobiolo	gical parai	neters
Yes		No								
2. L	og b	ook contain	s the fol	lowing information:						
2	4	Date, time	and loca	ation of each water fill		Yes		No		
b (Chlo	rine residua	l record	ed at time of filling N/	A □ Yes		No			
c	Date	, time and lo	ocation	of each water delivery		Yes		No		
d V	Volu	me of water	deliver	ed to each site	Yes		No			
e I	Date	and time of	equipm	ent disinfection	Yes		No			
f	Water sample results					Yes		No		
	supp	oly (i.e., unu		encountered with ter colour or odour), v	Yes vater haulag	ge vehicl	No e, and/o	r 🗆		
Comr	nents	3:								
Date	of In	spection:		(mm/dd/yyyy)						
Signature of Public Health Inspector:			or:					Date (mm/dd/yyyy)		yyy)
		•						Date	e (mm/dd/y	ууу)
Signa	ture	of Operator	•							

Appendix C.2 – Daily Activity Log Sheet

			COMMENTS			
Date (mm/dd/yyyy)	Time	Location of fill (F) or delivery (D)	Volume (gallons/litres)	Chlorine Residual level at time of filling (ppm)	(e.g. – problems with water source, vehicle, etc.)	OPERATOR SIGNATURE

Water Sampling and Testing – Attach all sample test results								