

**Ministry of the
Environment, Conservation
and Parks**

Guelph District Office
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**Ministère de l'Environnement de
la Protection de la nature et des
Parcs**

Bureau du district de Guelph
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Guelph (Ontario) N1G 4Y2



February 20, 2020

The Corporation of the City of Cambridge
Cambridge Public Works,
1310 Bishop Street
Cambridge, On
N1R 6V5 Canada

Attention: Mr. Chris Whetstone
Manager, Cambridge Public Works

Re: 2019-20 Cambridge Distribution System, Inspection Report # 1-N16XZ

Dear Mr. Whetstone,

Attached is the inspection report, for the inspection initiated in January 2020, to assess compliance of the distribution system with O.Reg 170/03.

Please note, you will find in the report that bullets are shown in bold print and are the consistent and standard responses to the information gathered during the inspection. Statements shown in regular font provides additional site-specific details.

In order to measure individual inspection results, the Ministry has established an inspection compliance risk framework based on the principles of the Inspection, Investigation & Enforcement (II&E) Secretariat and advice of internal/external risk experts. The Inspection Summary Rating Record (IRR), included as Appendix A of the inspection report, provides the Ministry, the system owner and the local Public Health Units with a summarized quantitative measure of the drinking water system's annual inspection and regulated water quality testing performance. Please note the attached IRR methodology memo describing how the risk rating model has improved to better reflect the health related and administrative non-compliance found in an inspection report. IRR ratings are published (for the previous inspection year) in the Ministry's Chief Drinking Water Inspectors' Annual Report. If you have any questions or concerns regarding the rating, please contact Lisa Williamson, Drinking Water Program Supervisor, at 519-837-6386. If you wish to discuss the results of the inspection in more detail, please feel free to contact me at (519) 826-4279.

Yours Truly,

A handwritten signature in cursive script, appearing to read "Manpreet Dhesi".

Manpreet Dhesi
Provincial Officer
Water Inspection Program
Guelph District Office
West Central Region

Cc : Martin Keller, Source Protection Planning Manager, Grand River CA
: Chris Komorowski, Health Protection, Regional Municipality of Waterloo Health Unit
: MOE Guelph District Office



Ministry of the Environment, Conservation and Parks

CAMBRIDGE DISTRIBUTION SYSTEM

Inspection Report

Site Number:	260002460
Inspection Number:	1-N16XZ
Date of Inspection:	Jan 17, 2020
Inspected By:	Manpreet Dhesi

Table of Contents

Owner & Contact Information

Inspection Details & Drinking Water System Components Description

Inspection Summary

- Introduction
- Treatment Processes
- Treatment Process Monitoring
- Distribution System
- Operations Manuals
- Logbooks
- Security
- Certification and Training
- Water Quality Monitoring
- Water Quality Assessment
- Reporting and Corrective Actions
- Other Inspection Findings

Non-Compliance with Regulatory Requirements and Actions Required

Summary of Best Practice Issues and Recommendations

Signatures

Appendices

A. Inspection Rating Record

OWNER INFORMATION:

Company Name:	CAMBRIDGE, THE CORPORATION OF THE CITY OF		
Street Number:	50	Unit Identifier:	
Street Name:	DICKSON St N		
City:	CAMBRIDGE		
Province:	ON	Postal Code:	N1R 5W8

CONTACT INFORMATION

Type:	Main Contact	Name:	Chris Whetstone
Phone:	(519) 621-0740 x4556	Fax:	(519) 622-8032
Email:	whetstone@cambridge.ca		
Title:	Manager of Water		

Type:	Health Unit	Name:	Chris Komorowski
Phone:	(519) 575-4400	Fax:	(519) 743-5654
Email:	ckomorowski@regionofwaterloo.ca		
Title:	Manager, Inspections		

Type:	Conservation Authority	Name:	Martin Keller
Phone:		Fax:	(519) 621-4844
Email:	mkeller@grandriver.ca		
Title:	Source Protection Planning Manager, GRCA		

INSPECTION DETAILS:

Site Name:	CAMBRIDGE DISTRIBUTION SYSTEM
Site Address:	CAMBRIDGE
County/District:	CAMBRIDGE
MECP District/Area Office:	Guelph District
Health Unit:	REGIONAL MUNICIPALITY OF WATERLOO, PUBLIC HEALTH
Conservation Authority:	Grand River Conservation Authority
MNR Office:	Guelph District Office
Category:	Large Municipal Residential
Site Number:	260002460
Inspection Type:	Announced
Inspection Number:	1-N16XZ
Date of Inspection:	Jan 17, 2020
Date of Previous Inspection:	Feb 06, 2019

COMPONENTS DESCRIPTION

Site (Name):	DISTRIBUTION	Sub Type:	Other
Type:	Other		
Comments:			

The Cambridge Distribution System is Class II distribution system which services about 132,000 people via approximately 39,274 service connections, which include private residences as well as business and industrial users.

The oldest distribution piping in the system is about 115 years old. There are an estimated 586 kilometers of watermains located within Cambridge, of which the City of Cambridge owns 491 kilometers, the Regional Municipality of Waterloo owns 64 kilometers, and there are 32 kilometers of dual-use components. There are 3,464 hydrants providing fire protection and 5,126 valves (including shared) of various sizes for controlling water flow. The distribution system is divided into five individual pressure zones based on the water supply components and the varying elevations throughout the City.

The Cambridge Distribution System receives its water from various sources that are owned and operated by the Regional Municipality of Waterloo. These sources include the Pinebush Water Treatment Plant, Shades Mill Water Treatment Plant, Turnbull Water Treatment Plant, Middleton Water Treatment Plant and other individual groundwater wells including wells H3, H4, H4A, H5, G4, G4A, G5, G5A G6, G9, P9 and P15. The Regional Municipality of Waterloo also owns and operates all storage facilities (i.e. elevated tanks) located within the Cambridge Distribution System.

The Cambridge Distribution System does not include any treatment processes. The City of Cambridge operates the distribution system including pipes, valves, hydrants and residential meters. The Region of Waterloo is responsible for the capital rehabilitation / replacement of the larger transmission lines under their ownership. The City is responsible to provide water to Lloyd Brown Distribution system.

Site (Name):	MOE DWS Mapping	
Type:	DWS Mapping Point	Sub Type:

INSPECTION SUMMARY:

Introduction

- The primary focus of this inspection is to confirm compliance with Ministry of the Environment, Conservation and Parks (MECP) legislation as well as evaluating conformance with ministry drinking water policies and guidelines during the inspection period.

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 report is based on an inspection of a "stand alone connected distribution system". This type of system receives treated water from a separately owned "donor" system. This report contains elements required to assess key compliance and conformance issues associated with a "receiver" system. This report does not contain items associated with the inspection of the donor system, such as source waters, intakes/wells and treatment facilities.

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.

The Cambridge Distribution System is owned and operated by the City of Cambridge. The inspection of the Cambridge Distribution System was initiated in January 2020. The review period for the inspection was until December 31, 2019. Municipal Drinking Water License (MDWL) 015-101, Issue # 4 dated September 2019 and Drinking Water Works Permit (DWWP) 015-201, Issue # 5 dated September 2019 were in effect during this inspection.

Treatment Processes

- **The owner had ensured that all equipment was installed in accordance with Schedule A and Schedule C of the Drinking Water Works Permit.**

The system description contained within Schedule A of DWWP indicates that the system consists of five individual pressure zones based on the water supply components and the varying elevations throughout the City. It also documents that the City owns 475 km watermain while 62 km are under the Region of Waterloo ownership, with 32 km of dual-use watermain. It was noted that the information included in the Annual report- 2018 varied from the above description included in the DWWP issued in September 2019. It is recommended that the City ensures that the next issue of the DWWP have updated information.

- **The owner/operating authority was in compliance with the requirement to prepare Form 1 documents as required by their Drinking Water Works Permit during the inspection period.**

Forms 1 were prepared for:

- Replacement of watermain and appurtenances on Blair Road from Grant Street to Park Hill Road, in March 2019.
- Replacement of watermain and appurtenances on Fancies Street from St. Andrew St. to Glenmorris St., Tait St. from Dumfries St. to First Ave. and Selkirk Street from Tait St. to Glenmorris St., in March 2019.
- Replacement of approximately 165 m of 300 mm diameter ductile iron watermain, and 200 mm diameter cast iron watermain and appurtenances with 300 mm diameter PVC watermain and appurtenances, along Main street from Wellington Street to Shade Street, in March 2019. As well as replacement of approximately 20 m of 200 mm ductile iron watermain and appurtenances with a 200 mm diameter PVC watermain and appurtenances on Shade Street, which ties in to the replaced 300 mm diameter watermain on Main Street, in March 2019.

- **Where an activity has occurred that could introduce contamination, all parts of the drinking water system**

Treatment Processes

were disinfected in accordance with Schedule B, Condition 2.3 of the Drinking Water Works Permit.

The City of Cambridge has a procedure SOP-WD-02 "Watermain Break Repairs and Reporting". In addition, the City has created a "Watermain Break and Repair Evaluation Form". The form is completed by the operators to document the details of the incident including, secondary disinfection residuals and microbiological sampling results (where required). Job tickets are created for repair and inspection activities. The completed forms and sampling results (where required) are attached to the job ticket in the Maximo database, for reference.

- **The owner had evidence indicating that all chemicals and materials that come in contact with water within the drinking water system met the AWWA and ANSI standards in accordance with the Municipal Drinking Water Licence and Drinking Water Works Permit issued under Part V of the SDWA.**

The City of Cambridge is responsible for ensuring chemicals used in the distribution system meet AWWA and ANSI standards when new, altered or repaired watermain conditions exist and as required by Schedule B, section 14.0 of Municipal Drinking Water Licence (MDWL) No. 015-101 (Issue No. 4). The City of Cambridge has several standard operating procedures (SOP) that reference the use of AWWA and ANSI standards as required for distribution repairs. Further more, the City provided a document supporting that calcium hypochlorite tablets used by the operators are NSF/ANSI/CAN 60 approved.

- **Up-to-date plans for the drinking water system were kept in a place, or 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 DWWP and MDWL issued under Part V of the SDWA.**

The City of Cambridge utilizes a GIS mapping system where every hydrant, valve and pipe length is tagged and uploaded into the GIS mapping database. The GIS mapping database integrates with another database called 'Maximo' which tracks all activities associated with the distribution components. Any associated plans or process and instrumentation diagrams (P&ID) are also attached and available for review. As changes are made to the distribution system, the GIS and Maximo databases are updated on a continuous basis. Operators are aware of the location of the information and are able to review pertinent diagrams and plans, when required.

Treatment Process Monitoring

- **The secondary disinfectant residual was measured as required for the distribution system.**

Records provided during the inspection indicated that the secondary disinfectant residuals (free chlorine as well as total chlorine) were measured by collecting at least seven distribution samples over two days at least 48 hours apart. The City of Cambridge has contracted the Region of Waterloo's laboratory to collect the grab samples two times per week. The operator indicated that while the City watermains are mainly fed by the chlorinated water from the Cambridge water treatment plants, a small area in the distribution system which is fed by Briardene valve and Dundee Road valve has chloraminated water from the Region's Integrated Urban System.

- **Samples for chlorine residual analysis were tested using an acceptable portable device.**

Laboratory staff test for free chlorine and total chlorine residuals within the DS every week using handheld Hach testing units. The Hach units are checked against a set of standards every quarter and are calibrated by a third party annually to ensure the unit accuracy as recommended by the manufacturer. The City of Cambridge operational staff also use handheld Hach units for testing of chlorine during distribution repair activities, the City of Cambridge indicated the Hach units are checked against a set of standards every quarter. The records of latest verification were reviewed during the inspection.

Distribution System

- **The owner had up-to-date documents describing the distribution components as required.**
- **There is a backflow prevention program, policy and/or bylaw in place.**

Distribution System

The City of Cambridge has implemented by-law number 146-03 which addresses backflow prevention and cross connections.

- **The owner had implemented a program for the flushing of watermains as per industry standards.**

The City of Cambridge has implemented SOP WD-41 titled 'Watermain Flushing' that specifically addresses the steps to be followed for flushing activities. The frequency that watermains are to be flushed depends on factors such as maintenance activities that could warrant flushing afterward, if the watermain services a dead-end or if there have been complaints regarding water aesthetics. The City indicated that the aim is to flush approximately 80-100 kilometers of watermain every year, thus ensuring the distribution is flushed in its entirety every six years. In areas where dead-ends exist or pipe age and/or type require, more frequent flushing is carried out on an ongoing basis. All flushing activities are documented via a job ticket, completed by the operators and then are uploaded into the Maximo database for tracking purposes.

- **Records confirmed that disinfectant residuals were routinely checked at the extremities and "dead ends" of the distribution system.**

- **A program was in place for inspecting and exercising valves.**

The City of Cambridge has implemented SOP WD-28 titled 'Valve Exercising' that specifically addresses the method to be followed for exercising activities. The City uses a valve turning machine and exercises and inspects valves on an on-going basis. Job tickets are generated based on a grid system with the aim of completing all valves within the distribution system every two years. Valve exercising activities are documented via the job ticket, completed by the operators and then are uploaded into the Maximo database for tracking purposes.

- **There was a program in place for inspecting and operating hydrants.**

The City of Cambridge has implemented SOP WD-12 titled 'Hydrant Inspection' that lists the procedure to follow when inspecting and maintaining the hydrant. Steps undertaken by the operators include visual inspection, opening/closing the hydrant, lubricating threads, pressure testing and dip testing to ensure the hydrant barrel drains. Job tickets are generated based on a grid system with the aim of inspecting all hydrants within the distribution system every year. Inspection activities are documented via the job ticket, completed by the operators and then are uploaded into the Maximo database for tracking purposes. Any issues identified are reported to the manager and a second job ticket is created for the repair work that once completed is also uploaded to the Maximo database with the details of the work completed.

- **There was a by-law or policy in place limiting access to hydrants.**

The City of Cambridge has implemented by-law number 146-03 which limits access to hydrants to the City public works staff, members of the fire department or persons with written approval from the City but while overseen by the City staff. Any unauthorised use of the hydrants is prohibited.

- **The owner was able to maintain proper pressures in the distribution system and pressure was monitored to alert the operator of conditions which may lead to loss of pressure below the value under which the system is designed to operate.**

The City of Cambridge distribution system has five pressure zones. It monitors pressure through the use of data loggers that can be set up at locations that have been identified by the staff or through consumer complaints. Pressure is also monitored during fire flow testing. In addition, the Region of Waterloo has pressure monitoring at the various supply pumphouses, storage tanks and elevated tanks throughout the system, and communicates with the City if a pressure event is experienced. The data review indicated that no low pressure event occurred during the inspection period.

- **The donor had provided an Annual Report to the receiver drinking water system.**

Distribution System

The Cambridge Distribution System is supplied by the Cambridge Well Supply (DWS# 220000166), which is owned and operated by the Region of Waterloo. The Lloyd Brown Subdivision Distribution System receive its water via the Cambridge Distribution System. The Region as well as the City of Cambridge post the Annual Report on their website, for review.

Operations Manuals

- **Operators and maintenance personnel had ready access to operations and maintenance manuals.**
'Controlled' versions of the operations manual is available on-site at the Public Works Department located at 1310 Bishop Street in Cambridge. Additionally, all contents of the operations manuals are available for review electronically and operators are able to seek direction via telephone if out on site. Operators are aware of the location of the manuals.
- **The operations and maintenance manuals contained plans, drawings and process descriptions sufficient for the safe and efficient operation of the system.**
- **The operations and maintenance manuals met the requirements of the Drinking Water Works Permit and Municipal Drinking Water Licence issued under Part V of the SDWA.**

Logbooks

- **Records or other record keeping mechanisms confirmed that operational testing not performed by continuous monitoring equipment was being done by a certified operator, water quality analyst, or person who suffices the requirements of O. Reg. 170/03 7-5.**
- **For every required operational test and every required sample, a record was made of the date, time, location, name of the person conducting the test and result of the test.**
- **Logs or other record keeping mechanisms were available for at least five (5) years.**

Security

- **The owner had provided security measures to protect components of the drinking water system.**

Consumer Relations

- **The owner and/or operating authority undertook efforts to promote water conservation and reduce water losses in their system.**

Water conservation is largely managed by the Region of Waterloo as they own and operate the water supply and treatment facilities and have dedicated web page on their website.

Certification and Training

- **The overall responsible operator had been designated for each subsystem.**
The ORO is designated in SOP-WD-40: "Overall Responsible Operator and Operator In Charge". Coverage for the ORO is rotated on a weekly basis between the designated managers. The rotation schedule is documented on the weekly stand-by sheet.
- **Operators-in-charge had been designated for all subsystems which comprised the drinking water system.**

Certification and Training

The OIC is designated in SOP-WD-40: "Overall Responsible Operator and Operator In Charge". For the purpose of OIC coverage during regular working days (Monday-Friday, 7:00 to 15:00), all lead hands in the Water, and Utilities Maintenance Departments are deemed OIC. During after hours (15:00 to 07:00), weekends, and holidays, the Stand-by Water Operator is deemed as OIC, unless otherwise appointed by the ORO. Stand-by Water Operators are documented on the weekly stand-by sheet.

- **All operators possessed the required certification.**

Water Quality Monitoring

- **All microbiological water quality monitoring requirements for distribution samples were being met.**

Based on the population served by the Cambridge DS, the City is required by Schedule 10-2 of O. Reg. 170/03 to ensure that at least one hundred and thirteen distribution water samples are collected every month. Samples must be tested for Escherichia coli, total coliforms and general bacteria population expressed as colony counts on a heterotrophic plate count (HPC). Review of sampling records confirmed that this requirement was met. Typically the City collects additional samples, over and above the legislated requirement, thus providing a comprehensive microbiological history.

- **All haloacetic acid water quality monitoring requirements prescribed by legislation are being conducted within the required frequency and at the required location.**

Schedule 13-6.1 of O. Reg. 170/03 requires at least one distribution sample be taken in each calendar quarter, from a point in the distribution system that is likely to have an elevated potential for the formation of haloacetic acids, and tested for haloacetic acids. Schedule 6-1.1 of O.Reg. 170 indicates that if a sample is required every calendar quarter, the sample shall be taken at least 60 days, and not more than 120 days, after a sample was taken for that purpose in the previous three-month period.

The review of the sampling data indicated that the samples were taken in January, April, July and October 2019. The running annual average is 6.45 ug/L which is less than the Ontario Drinking Water Quality Standard of 0.08 mg/L which came into effect on January 1, 2020.

- **All trihalomethane water quality monitoring requirements prescribed by legislation were conducted within the required frequency and at the required location.**

Schedule 13-6 of O. Reg. 170/03 requires at least one distribution sample be taken in each calendar quarter, from a point in the distribution system that is likely to have an elevated potential for the formation of trihalomethanes, and tested for trihalomethanes (THMs). Schedule 6-1.1 of O.Reg. 170 indicates that if a sample is required every calendar quarter, the sample shall be taken at least 60 days, and not more than 120 days, after a sample was taken for that purpose in the previous three-month period.

During the inspection period, the Region sampled for these parameters in January, April, July and October 2020. The running annual average is 16.49 ug/L which is less than the Ontario Drinking Water Quality Standard of 100 ug/L.

- **The owner ensured that water samples were taken at the prescribed location.**

- **All sampling requirements for lead prescribed by schedule 15.1 of O. Reg. 170/03 were being met.**

The Cambridge DS qualified for the reduced lead sampling exemption allowed under Schedule 15.1- 5 of O. Reg. 170/03 in Summer 2015. Under reduced sampling, the City is required to take samples at 50 sampling points in plumbing that serves private residences, 5 sampling points in plumbing that does not serve private residences and 10 sampling points in the distribution system. The inspection review of the sampling records indicates that the sampling has been conducted at the required number of sampling points for the last two sampling periods. 3.6 % plumbing sampling results exceeded the lead ODWS (Ontario Drinking Water Standard) of 10 ug/l during the sampling period of December 2018- April 2019 while 5.2 % of the plumbing sampling results exceeded the ODWS

Water Quality Monitoring

for - 10 ug/l for the sampling period of June 15, 2019- October 15, 2019. pH and alkalinity samples were also collected and analyzed as required, for the last two sampling periods.

- **Records confirmed that chlorine residual tests were being conducted at the same time and at the same location that microbiological samples were obtained.**
- **The owner indicated that the required records are kept and will be kept for the required time period.**

Water Quality Assessment

- **Records did not show that all water sample results taken during the inspection review period did not exceed the values of tables 1, 2 and 3 of the Ontario Drinking Water Quality Standards (O.Reg. 169/03).**
There were four incidents for lead exceedances and one for total coliform presence, during the inspection period.

Reporting & Corrective Actions

- **Corrective actions (as per Schedule 17) had been taken to address adverse conditions, including any other steps that were directed by the Medical Officer of Health.**
During the inspection review period there were six reported adverse water incidents; four of them were plumbing sampling results exceeding the ODWS of lead and one was unconfirmed presence of Total coliforms in the distribution water and one was sodium sample result higher than 20 mg/l . Corrective actions were taken as required for each instance.
- **Corrective actions as directed by the Medical Officer of Health had been taken by the owner and operating authority to address exceedances of the lead standard.**
Documentation reviewed during the inspection period indicated that appropriate corrective actions as per the directions provided from the Medical Officer of Health were taken for the lead exceedances. It was also noted that the letters were sent to the home owners within seven days of the sample results received, as required, by the City authorities.
- **All required notifications of adverse water quality incidents were immediately provided as per O. Reg. 170/03 16-6.**
- **All required written notices of adverse water quality incidents were provided as per O. Reg. 170/03 16-7.**
- **In instances where written notice of issue resolution was required by regulation, the notice was provided as per O. Reg. 170/03 16-9.**
- **Summary Reports for municipal council were completed on time, included the required content, and were distributed in accordance with the regulatory requirements.**
A copy of the Summary report, prepared in February 2019, was reviewed during the inspection.
- **All changes to the system registration information were provided within ten (10) days of the change.**

NON-COMPLIANCE WITH REGULATORY REQUIREMENTS AND ACTIONS REQUIRED

This section provides a summary of all non-compliance with regulatory requirements identified during the inspection period, as well as actions required to address these issues. Further details pertaining to these items can be found in the body of the inspection report.

Not Applicable

SUMMARY OF RECOMMENDATIONS AND BEST PRACTICE ISSUES

This section provides a summary of all recommendations and best practice issues identified during the inspection period. Details pertaining to these items can be found in the body of the inspection report. In the interest of continuous improvement in the interim, it is recommended that owners and operators develop an awareness of the following issues and consider measures to address them.

Not Applicable

SIGNATURES

Inspected By:
Manpreet Dhesi

Signature: (Provincial Officer)



Reviewed & Approved By:
Lisa Williamson

Signature: (Supervisor)



Review & Approval Date:

February 20, 2020

Note: This inspection does not in any way suggest that there is or has been compliance with applicable legislation and regulations as they apply or may apply to this facility. It is, and remains, the responsibility of the owner and/or operating authority to ensure compliance with all applicable legislative and regulatory requirements.

APPENDIX A

INSPECTION RATING RECORD

Ministry of the Environment - Inspection Summary Rating Record (Reporting Year - 2019-2020)

DWS Name: CAMBRIDGE DISTRIBUTION SYSTEM
DWS Number: 260002460
DWS Owner: Cambridge, The Corporation Of The City Of
Municipal Location: Cambridge

Regulation: O.REG 170/03
Category: Large Municipal Residential System
Type Of Inspection: Standalone
Inspection Date: January 17, 2020
Ministry Office: Guelph District

Maximum Question Rating: 324

Inspection Module	Non-Compliance Rating
Treatment Processes	0 / 51
Distribution System	0 / 4
Operations Manuals	0 / 42
Logbooks	0 / 22
Certification and Training	0 / 28
Water Quality Monitoring	0 / 71
Reporting & Corrective Actions	0 / 77
Treatment Process Monitoring	0 / 29
TOTAL	0 / 324

Inspection Risk Rating	0.00%
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FINAL INSPECTION RATING:	100.00%
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Ministry of the Environment - Detailed Inspection Rating Record (Reporting Year - 2019-2020)

DWS Name: CAMBRIDGE DISTRIBUTION SYSTEM
DWS Number: 260002460
DWS Owner: Cambridge, The Corporation Of The City Of
Municipal Location: Cambridge

Regulation: O.REG 170/03
Category: Large Municipal Residential System
Type Of Inspection: Standalone
Inspection Date: January 17, 2020
Ministry Office: Guelph District

Maximum Question Rating: 324

Inspection Risk Rating | 0.00%

FINAL INSPECTION RATING: | 100.00%