

**Report To:** Halton-Hamilton Source Protection Committee  
**Report No.:** SPC-22-12-02  
**From:** Martin Keller, Senior Manager, Watershed Planning and Source Protection, mkeller@hrca.on.ca  
**Date:** December 6, 2022  
**Subject:** Update – 2021 Technical Rules Implications

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### **Recommendation**

**THAT** the Halton-Hamilton Source Protection Committee receives for information the staff report SPC-22-12-02 Update – 2021 Technical Rules Implications.

### **Executive Summary**

Staff are continuing to analyze the implications of the updated technical framework and revised 2021 Technical Rules under the *Clean Water Act, 2006*, including revised circumstances for identifying significant drinking water threats on the Halton-Hamilton Source Protection Region (HHSR). Further updates on the analysis carried out thus far are provided in this report.

### **Report**

#### **Background**

In December 2021, the Ministry of the Environment, Conservation and Parks (MECP) revised the Technical Rules under the *Clean Water Act, 2006*. The rules are available at: <https://www.ontario.ca/page/2021-technical-rules-under-clean-water-act>

Note that the recently submitted comprehensive HHSR updates under Section 36 of the *Clean Water Act, 2006* were undertaken following the 2017/2018 Technical Rules. The 2021 Technical Rules will apply to subsequent Assessment Report and Source Protection Plan updates at HHSR.

#### **Impervious Surfaces**

Staff are continuing to explore the 100 x 100 m grid approach to identifying and calculating the percent impervious surface area, including fine tuning the grid size and investigating the need for smoothing option. One of the next steps is developing the mapping products for other vulnerable areas, in addition to the mapping for the Carlisle WHPAs and WHPA-E presented at the September 13, 2022 SPC meeting. Work has been delayed as a result of focusing on ensuring the Annual Progress Reporting framework is ready for release to municipalities in time for the 2022 reporting period.

#### **Livestock Density Estimations**

Staff have considered the input from SPC members and discussions at the September 13, 2022 SPC meetings. Further discussions were also held internally and with municipal

partners. Staff propose to not change the approach to estimating livestock density within vulnerable areas. The reasons are as follows:

- The source protection program is built on the precautionary principle, and with conservatism in mind.
- The identification of significant drinking water threats, based on vulnerability scores in vulnerable areas and circumstances as per the Tables of Drinking Water Threats, is the result of a desktop exercise that does not consider whether an activity is present or occurs on the ground.
- Identified significant drinking water threats are a flag for policy implementers (e.g., RMOs), and do not signify that a specific activity is having an impact on the sources of municipal drinking water.
- Policy implementers / RMOs undertake drinking water threat verification before policies are implemented. For example, a Risk Management Plan (RMP) would only be required once the RMO confirms that a specific activity occurs and the necessary thresholds are met.
- There is no mechanism for SPA staff to be informed about some land use changes, e.g., a property changing from livestock farming to crop farming. The most accurate assessment of land use changes is at the time of policy implementation, i.e., through site visits and verification of activities.
- Staff investigated the use of Agricultural Census Data. Data for the Census Consolidated Subdivisions (CCS) is available for free download. However, the CCS areas (for the HHSPR) do not offer any further refinement to the vulnerable areas (the CCS area boundaries closely mirror the SPA boundaries). Therefore, this data does not improve calculation of livestock density. Further refinement may be possible using smaller census areas, although funding to purchase this information is not currently available. It should be noted that census data is only accurate at the point of collection and quickly becomes inaccurate for such calculations.
- Livestock densities are shown in three different categories (less than 0.5 nutrient units per acre, between 0.5 and 1.0 nutrient units per acre, above 1.0 units per acre). Refined calculations of livestock densities would only make a difference if it would result in a change in category.

### **Further Analysis of 2021 Technical Rules and Threat Circumstances**

Further assessment of implications and necessary work as a result of the 2021 Technical Rules and changes in threat circumstances are included in **Appendix A**, building on the work and analysis presented to the Halton-Hamilton Source Protection Committee previously. The attached table includes an assessment of the changes in the 2021 Technical Rules, revised circumstances and thresholds for identifying significant drinking water threats, implications of these changes to the Halton-Hamilton Source Protection Region, tasks to address these changes, and priority (high, medium, low) for addressing them. Staff intend to complete most of the necessary changes by the end of 2023 and will provide regular updates to the SPC for discussion and direction.



**Next Steps**

Staff will bring further updates to future HHSPC meetings. Source Protection Plan updates that are made under S.34 of the *Clean Water Act, 2006* will need to follow the 2021 Technical Rules as required by the legislation.

Signed & respectfully submitted:

A handwritten signature in black ink that reads "M Keller".

Martin Keller  
Senior Manager, Watershed Planning and Source Protection

A handwritten signature in black ink that reads "M Bergen".

Mardi Bergen  
Source Water Information Coordinator, Watershed Planning and Source Protection

# Appendix A - Analysis of the Technical Rules 2021 including Threat Circumstances under the Clean Water Act, 2006

## Halton-Hamilton Source Protection Committee Meeting - December 6, 2022

IPZ: Intake Protection Zone; WHPA: Wellhead Protection Area; HVA: Highly Vulnerable Aquifer; ICA: Issue Contributing Area; TDWT: Tables of Drinking Water Threats, online at [swpip.ca](http://swpip.ca); SDWT: Significant Drinking Water Threat

**TABLE 1: TECHNICAL RULES 2021**

Topic	2021 Technical Rules / Circumstances	Implications	Task	Priority
<b>SIGNIFICANT GROUNDWATER RECHARGE AREAS (SGRAs)</b>  Rule 8(1): Vulnerability Score Rule 13(5): Uncertainty analysis Rule 16(9): Mapping of percent managed lands Rule 126: Conditions	<ul style="list-style-type: none"> <li>Removal of all remaining references connecting SGRAs to water quality</li> </ul>	<ul style="list-style-type: none"> <li>The delineation of SGRAs is retained as a water quantity vulnerable area only.</li> </ul>	<ul style="list-style-type: none"> <li>Updates to maps and text of Assessment Report and Source Protection Plan</li> </ul>	Complete
<b>USE OF ALTERNATE METHODS OR APPROACHES</b>  Rules 15.1 and 15.2	<ul style="list-style-type: none"> <li>Ability for SPC to use alternate method or approach (Rule                             <ul style="list-style-type: none"> <li>Need written consent from MECP</li> <li>Need documentation in assessment report</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>Only applies if SPC decides to use an alternate method to any of the technical rules.</li> <li>As best practice, staff will seek early input from municipalities, SPC, and MECP, prior to inclusion of alternate methods into assessment reports</li> </ul>	<ul style="list-style-type: none"> <li>N/A</li> </ul>	N/A
<b>CLIMATE CONSIDERATIONS - WATER QUALITY</b>  Rule 15.3	<ul style="list-style-type: none"> <li>Clarification of documentation needed for including climate change risk assessment for water quality in assessment report</li> </ul>	<ul style="list-style-type: none"> <li>Climate change risk assessment is optional</li> <li>SPA staff can assist municipalities in undertaking assessment</li> <li>Assessment can be scoped to one or only a few (vulnerable) drinking water systems</li> <li>MECP does not direct/recommend specific</li> </ul>	<ul style="list-style-type: none"> <li>SPA staff to continue discussions with municipality on interest to undertake climate change risk assessment</li> <li>SPA staff will engage neighbouring source protection region for possible collaboration on watershed wide portion</li> </ul>	High

Topic	2021 Technical Rules / Circumstances	Implications	Task	Priority
		type of assessment tool <ul style="list-style-type: none"> <li>Conservation Ontario assessment tool is one option</li> </ul>	of assessment	
<b>ISSUE CONTRIBUTING AREAS (ICAS)</b>  Rule 16 (9) (b) Rule 47 (7) & 48 (7) WHPA-ICA Rule 58 (5) IPZ-ICA Rule 78.1 IPZ-ICA Rule 115 (3) Rule 116 – removed	<ul style="list-style-type: none"> <li>Introduction of ICA as standalone vulnerable area (WHPA-ICA, IPZ-ICA)</li> <li>Removal of WHPA-F</li> </ul>	<ul style="list-style-type: none"> <li>New technical rules need to be followed for newly identified ICAs only</li> <li>May require calculation of managed lands, livestock density and impervious surface areas</li> <li>No need to reassess existing ICAs (e.g., Cedarville ICA extending into HHSPR)</li> <li>There are no WHPA-F</li> </ul>	<ul style="list-style-type: none"> <li>SPA staff to continue discussions with Halton Region staff</li> <li>Campbellville: Identification of chloride / sodium ICA will depend on extended monitoring results undertaken by Halton Region (six additional monitoring wells since 2019)</li> </ul>	Medium
<b>TOTAL IMPERVIOUS SURFACE AREA MAP / APPLICATION OF ROAD SALT</b>  Rule 16 (11)	<ul style="list-style-type: none"> <li>Removal of requirement to use 1km by 1km grid for calculating percent impervious surface areas</li> <li>Allows calculation to be done for a vulnerable area as a whole or sub-areas</li> </ul>	<ul style="list-style-type: none"> <li>Opportunity to re-calculate percent impervious surface areas following revised methods in 2021 Technical Rules</li> <li>See Table 2: Application of Road Salt</li> </ul>	<ul style="list-style-type: none"> <li>SPA staff to continue exploring new method for calculating percent impervious areas (progress presented at June 7 and September 13, 2022 SPC meetings)</li> </ul>	High
<b>TIER 3 WATER BUDGET</b>  Rule 30.1	<ul style="list-style-type: none"> <li>Ability to include in assessment report description of steps for completion of Tier 3 study</li> </ul>	<ul style="list-style-type: none"> <li>Greater flexibility for timing of the work</li> </ul>	<ul style="list-style-type: none"> <li>Continue discussion with municipal staff on initiation and completion of Tier 3 studies</li> </ul>	Medium
<b>WHPA-E</b>  Rule 50.1	<ul style="list-style-type: none"> <li>Ability to include in assessment report description of steps for completion of WHPA-E delineation</li> </ul>	<ul style="list-style-type: none"> <li>No new WHPA-Es anticipated</li> </ul>	<ul style="list-style-type: none"> <li>N/A</li> </ul>	
<b>INTAKE RE-CLASSIFICATION</b>  Rule 55.1	<ul style="list-style-type: none"> <li>Ability to change classification of the intake with supporting documentation and evidence included in assessment report</li> </ul>	<ul style="list-style-type: none"> <li>No need to re-classify any of the Lake Ontario intakes in HHSPR</li> </ul>	<ul style="list-style-type: none"> <li>N/A</li> </ul>	

Topic	2021 Technical Rules / Circumstances	Implications	Task	Priority
<b>IPZ-1 DELINEATION</b>  Rule 62.1	<ul style="list-style-type: none"> <li>Ability to extend setback on land for IPZ-1 beyond 120m if area drains to the intake</li> </ul>	<ul style="list-style-type: none"> <li>Areas within IPZ-2 that function as transport pathways could be included in IPZ-1. As a result, these areas would receive a higher vulnerability score. Overall, vulnerability score still too low for SDWTs.</li> </ul>	<ul style="list-style-type: none"> <li>N/A</li> </ul>	
<b>IPZ-2 VULNERABILITY</b>  Rule 86, 87, 89	<ul style="list-style-type: none"> <li>Ability to subdivide IPZ-2 to enable different vulnerability scores for each subarea</li> </ul>	<ul style="list-style-type: none"> <li>Science based subdivision of IPZ-2 and vulnerability scoring possible, but would not increase scoring to result in SDWT.</li> <li>Subdivided IPZ-2 would require recalculation and remapping of managed lands, livestock density, and impervious surface areas.</li> </ul>	<ul style="list-style-type: none"> <li>N/A</li> </ul>	
<b>LOCAL THREAT DESIGNATION</b>  Rule 119	<ul style="list-style-type: none"> <li>Limits the designation of a local threat to activities that are <u>not</u> provincially or federally legislated</li> </ul>	<ul style="list-style-type: none"> <li>Transportation of hazardous goods no longer eligible for local threat designation as it is regulated by Ontario dangerous Good Transportation Act and federal Transportation of Dangerous Goods Act, 1992</li> </ul>	<ul style="list-style-type: none"> <li>N/A</li> </ul>	
<b>CONDITIONS</b>  Rule 141	<ul style="list-style-type: none"> <li>Changed criteria for condition to be identified as a SDWT to include evidence that contamination is migrating towards the well or intake</li> </ul>	<ul style="list-style-type: none"> <li>To be evaluated</li> </ul>	<ul style="list-style-type: none"> <li>SPA staff to discuss with municipal staff on potential benefits of investigating condition sites</li> </ul>	<b>Low</b>

**TABLE 2: TABLES OF DRINKING WATER THREATS (TDWT) THREAT CIRCUMSTANCES 2021**

Topic	2021 Technical Rules / Circumstances	Implications	Task	Priority
<p><b>PROCESSED ORGANIC WASTE (POW)</b></p> <p>Circumstance: 1.2 Application of POW to Land 1.9 Storage of POW or Waste Biomass</p>	<ul style="list-style-type: none"> <li>• New definition for managed lands</li> <li>• Introduction of POW as new sub-category under waste threat</li> </ul>	<ul style="list-style-type: none"> <li>• Separation of NASM use on agricultural land (managed by a Nutrient Management Plan administered by OMAFRA or through ECA process by MECP) from POW use on non-agricultural land (managed by ECA by MECP)</li> <li>• Application of POW:               <ul style="list-style-type: none"> <li>○ SDWT in WHPA-A, B v=10</li> <li>○ SDWT in WHPA-E v=8.1 to 10</li> <li>○ Dependent on level of managed lands and livestock density</li> </ul> </li> <li>• Storage of POW:               <ul style="list-style-type: none"> <li>○ SDWT in WHPA-A, B v=10</li> <li>○ SDWT in WHPA-E v=8.1 to 10</li> <li>○ Dependent on mass of nitrogen in POW</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• Threat enumeration update (municipalities)</li> <li>• Policy revisions (SPA staff / municipalities)</li> </ul>	<p>Low</p>
<p><b>LANDFILLING</b></p> <p>Circumstance: 1.4 Landfilling (Hazardous Waste or Liquid Industrial Waste)</p>	<ul style="list-style-type: none"> <li>• Reduction in vulnerability score, activity can be SDWT in WHPA v=8, previously only WHPA v=10</li> </ul>	<ul style="list-style-type: none"> <li>• To be evaluated</li> </ul>	<ul style="list-style-type: none"> <li>• Threat enumeration update (municipalities)</li> <li>• SPA staff to engage with municipalities to discuss potential policy revisions</li> </ul>	<p>Medium</p>
<p><b>HAULED SEWAGE</b></p> <p>Circumstance: 1.8 Storage of Hauled Sewage</p>	<ul style="list-style-type: none"> <li>• New sub-category for storage of hauled sewage at a site where the waste is stored temporarily by haulers where it is not generated or disposed.</li> <li>• Does not include septic tanks or septic systems where the sewage is produced before hauling</li> </ul>	<ul style="list-style-type: none"> <li>• To be evaluated</li> <li>• At a minimum, need policy revision to address new sub-category</li> </ul>	<ul style="list-style-type: none"> <li>• Threat enumeration update (municipalities)</li> <li>• SPA staff to engage with municipalities to discuss potential policy revisions</li> </ul>	<p>Medium</p>

Topic	2021 Technical Rules / Circumstances	Implications	Task	Priority
<p><b>PROCESSED ORGANIC WASTE (POW)</b></p> <p>Circumstance:            1.2 Application of POW to Land            1.9 Storage of POW or Waste Biomass</p>	<ul style="list-style-type: none"> <li>• New definition for managed lands</li> <li>• Introduction of POW as new sub-category under waste threat</li> </ul>	<ul style="list-style-type: none"> <li>• Separation of NASM use on agricultural land (managed by a Nutrient Management Plan administered by OMAFRA or through ECA process by MECP) from POW use on non-agricultural land (managed by ECA by MECP)</li> <li>• Application of POW:               <ul style="list-style-type: none"> <li>○ SDWT in WHPA-A, B v=10</li> <li>○ SDWT in WHPA-E v=8.1 to 10</li> <li>○ Dependent on level of managed lands and livestock density</li> </ul> </li> <li>• Storage of POW:               <ul style="list-style-type: none"> <li>○ SDWT in WHPA-A, B v=10</li> <li>○ SDWT in WHPA-E v=8.1 to 10</li> <li>○ Dependent on mass of nitrogen in POW</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• Update definitions, maps and relevant sections in the Assessment Reports, Source Protection Plan and Explanatory Document</li> <li>• Threat enumeration update (municipalities)</li> <li>• Policy revisions (SPA staff / municipalities)</li> </ul>	<p>Low</p>
<p><b>WASTE GENERATION AND STORAGE</b></p> <p>Circumstances:            1.10 Transfer/Processing Sites approved to receive Hazardous Waste or Liquid Industrial Waste            1.11 Transfer/Processing Site approved to receive only Municipal Waste under Part V of the EPA            1.12 Storage of Subject Waste at a Waste Generation Facility            1.13 Storage of Waste at a Waste Generation Facility</p>	<ul style="list-style-type: none"> <li>• Re-categorization of waste transfer/processing sites (1.10 and 1.11)</li> <li>• New subcategories for generation of subject waste (1.12) and waste exempt from the definition of subject waste (1.13)</li> <li>• Removal of “small volume” waste generation from list of threats</li> </ul>	<ul style="list-style-type: none"> <li>• To be evaluated</li> <li>• At a minimum, need policy revision to address new and revised sub-category</li> </ul>	<ul style="list-style-type: none"> <li>• Threat enumeration update (municipalities)</li> <li>• SPA staff to engage with municipalities to discuss potential policy revisions</li> </ul>	<p>Medium</p>



Topic	2021 Technical Rules / Circumstances	Implications	Task	Priority
<b>INDUSTRIAL EFFLUENT DISCHARGES</b>  Circumstances: 2.1 Industrial Effluent Discharges	<ul style="list-style-type: none"> <li>Can now also be a SDWT in a WHPA v=10</li> </ul>	<ul style="list-style-type: none"> <li>To be evaluated</li> </ul>	<ul style="list-style-type: none"> <li>Threat enumeration update (municipalities)</li> <li>SPA staff to engage with municipalities to discuss potential policy revisions</li> </ul>	Low
<b>STORM WATER MANAGEMENT FACILITIES</b>  Circumstances: 2.3, 2.4 Storm Water Management Facilities and Drainage Systems	<ul style="list-style-type: none"> <li>Differentiation of storm water sub-category to recognize different risks for surface water and groundwater:               <ul style="list-style-type: none"> <li>Outfall from a Storm Water Management Facility or Storm Water Drainage System</li> <li>Storm Water Infiltration Facility</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>To be evaluated</li> <li>At a minimum, need policy text update to align with new description and circumstance</li> </ul>	<ul style="list-style-type: none"> <li>Threat enumeration update (municipalities)</li> <li>SPA staff to engage with municipalities to discuss potential policy revisions</li> </ul>	Medium
<b>WASTEWATER COLLECTION FACILITIES</b>  Circumstances: 2.5, 2.6, 2.7 Wastewater Collection Facilities and Associated Parts	<ul style="list-style-type: none"> <li>Recognition of different risks for different types of wastewater collection</li> <li>Addition of lift station wet wells and Sanitary Sewer Overflows in description of circumstance</li> <li>Clarification of terminology</li> </ul>	<ul style="list-style-type: none"> <li>To be evaluated</li> <li>At a minimum, need policy text update to align with new description and circumstance</li> </ul>	<ul style="list-style-type: none"> <li>Threat enumeration update (municipalities)</li> <li>SPA staff to engage with municipalities to discuss potential policy revisions</li> </ul>	Medium
<b>WASTEWATER TREATMENT FACILITIES</b>  Circumstance: 2.8 Wastewater Treatment Facilities and Associated Parts	<ul style="list-style-type: none"> <li>Inclusion of new definitions aligned with provincial regulations</li> <li>Collapsing of three different sub-categories into one.</li> </ul>	<ul style="list-style-type: none"> <li>To be evaluated</li> <li>At a minimum, need policy text update to align with new description and circumstance</li> </ul>	<ul style="list-style-type: none"> <li>SPA staff to engage with municipalities to discuss potential policy revisions</li> </ul>	Medium
<b>NON-AGRICULTURAL SOURCE MATERIAL (NASM)</b>  Circumstance: 6.1 Application of Non-	<ul style="list-style-type: none"> <li>Alignment of circumstance terminology with definitions and categories of NASM in Nutrient Management Act and regulation</li> </ul>	<ul style="list-style-type: none"> <li>To be evaluated</li> <li>At a minimum, need policy text update to align with new description and circumstance</li> </ul>	<ul style="list-style-type: none"> <li>Threat enumeration update (municipalities)</li> <li>SPA staff to engage with municipalities to discuss potential policy revisions</li> </ul>	Medium

Topic	2021 Technical Rules / Circumstances	Implications	Task	Priority
Agricultural Source Material 7.1 Handling and Storage of Non-Agricultural Source Material				
<b>COMMERCIAL FERTILIZER</b>  Circumstance: 9.1 Handling and Storage of Commercial Fertilizer	<ul style="list-style-type: none"> <li>Removal or land use (e.g., retail, manufacturing, processing site) from circumstances</li> <li>Risk solely dependent on weight of commercial fertilizer stored</li> <li>SDWT in WHPA v=10 greater than 2,500kg (unchanged)</li> </ul>	<ul style="list-style-type: none"> <li>To be evaluated</li> <li>At a minimum, need policy text update to align with new description and circumstance</li> </ul>	<ul style="list-style-type: none"> <li>Threat enumeration update (municipalities)</li> <li>SPA staff to engage with municipalities to discuss potential policy revisions</li> </ul>	Medium
<b>PESTICIDES</b>  Circumstance: 10.1 Handling and Storage of Pesticides 11.1 Application of Pesticides	<ul style="list-style-type: none"> <li>Removal of specific pesticides references from circumstances. Circumstances can apply to all pesticides</li> <li>Removal or land use (e.g., retail, manufacturing, processing site) from circumstances</li> </ul>	<ul style="list-style-type: none"> <li>To be evaluated</li> <li>At a minimum, need policy text update to align with new description and circumstance</li> </ul>	<ul style="list-style-type: none"> <li>Threat enumeration update (municipalities)</li> <li>SPA staff to engage with municipalities to discuss potential policy revisions</li> </ul>	Medium
<b>APPLICATION OF ROAD SALT</b>  Circumstance: 12.1 Application of Road salt	<ul style="list-style-type: none"> <li>Reduction in percent threshold for SDWT for application of road salt: <ul style="list-style-type: none"> <li>WHPA v=10: greater than 30% (was 80%)</li> <li>IPZ and WHPA-E v=10: greater than 6% (was 80%)</li> <li>IPZ and WHPA-E v=9; greater than 8% (was 80%)</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>Opportunity to identify application of road salt as SDWT where new lower thresholds are met</li> <li>May result in application of road salt to be identified as SDWT in certain WHPA-A and Bs and WHPA-E (Carlisle)</li> <li>Does not affect IPZ (vulnerability scores too low)</li> </ul>	<ul style="list-style-type: none"> <li>SPA staff to develop mapping using new method for all vulnerable areas in HHSPR</li> <li>SPA to engage with municipalities on developing draft policies for any SDWTs identified</li> </ul>	High
<b>HANDLING AND STORAGE OF ROAD SALT</b> Circumstances: 13.1 Exposed to Precipitation or	<ul style="list-style-type: none"> <li>Reduction in threshold (weight) needed for storage of road salt to be SDTW</li> <li>Introduction of differentiation dependent on level of exposure to</li> </ul>	<ul style="list-style-type: none"> <li>Identification of SDWTs more likely with lower thresholds</li> </ul>	<ul style="list-style-type: none"> <li>Will require threat enumeration update (municipalities)</li> <li>SPA staff to engage with municipalities to discuss potential policy revisions</li> </ul>	High

Topic	2021 Technical Rules / Circumstances	Implications	Task	Priority
Runoff 13.2 Potentially Exposed to Precipitation or Runoff 13.3 Not Exposed to Precipitation or Runoff	precipitation <ul style="list-style-type: none"> <li>• SDWT thresholds               <ul style="list-style-type: none"> <li>○ 13.1: exposed to precipitation: 20kg or greater, WHPA v=10, WHPA-E v=9</li> <li>○ 13.2: potentially exposed to precipitation: 100kg or greater in outdoor bins, salt boxes, tarps, containers, 3-sided shed or dome, WHPA v=10</li> <li>○ 13.3: no SDWTs</li> </ul> </li> </ul>			
<b>SNOW STORAGE</b>  Circumstance: 14.1 Storage of Snow on a Site	<ul style="list-style-type: none"> <li>• Circumstance differentiates snow storage based on land use (commercial/industrial) and stormwater drainage system outfall</li> <li>• No minimum storage size (used to be 0.01 ha)</li> <li>• Minimum area now 200 m2</li> </ul>	<ul style="list-style-type: none"> <li>• To be evaluated</li> <li>• At a minimum, need policy text update to align with new description and circumstance</li> </ul>	<ul style="list-style-type: none"> <li>• Threat enumeration update (municipalities)</li> <li>• SPA staff to engage with municipalities to discuss potential policy revisions</li> </ul>	Medium
<b>FUEL</b>  Circumstance: 15.1 Handling and Storage of Fuel	<ul style="list-style-type: none"> <li>• Threshold for SDWT reduced to 250 Litres in WHPA v=10 for below and above ground storage (previously 2,500 Litres)</li> </ul>	<ul style="list-style-type: none"> <li>• To be evaluated</li> <li>• At a minimum, need policy text update to align with new description and circumstance</li> </ul>	<ul style="list-style-type: none"> <li>• Threat enumeration update (municipalities)</li> <li>• SPA staff to engage with municipalities to discuss potential policy revisions</li> </ul>	High
<b>DNAPL</b>  Circumstance: 16.1 Handling and Storage of a Dense Non-Aqueous Phase Liquid (DNAPL)	<ul style="list-style-type: none"> <li>• Use of list referencing industry type in circumstance. List adopts activities from brownfields regulation</li> <li>• List excludes residential and includes auto repair shops</li> <li>• Use of list is optional</li> </ul>	<ul style="list-style-type: none"> <li>• To be evaluated</li> <li>• At a minimum, need policy text update to align with new description and circumstance</li> </ul>	<ul style="list-style-type: none"> <li>• Threat enumeration update (municipalities)</li> <li>• SPA staff to engage with municipalities to discuss potential policy revisions</li> </ul>	High