## Ministry of the Environment

Safe Drinking Water Branch Laboratory Licensing and Compliance Program

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## Ministère de l'Environnement

Direction du contrôle de la qualité de l'eau potable Programme de délivrance des permis et de conformité des laboratoires

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## **September 21, 2011**

To: Licensed/Eligible Laboratory Managers

Re: Duty to Report Prescribed Adverse Results under the SDWA

As per s.18 of the SDWA, licensed/eligible laboratories have a duty to report prescribed adverse results of a drinking water test. Section 16-3, par. 3 of Schedule 16 of Ontario Regulation 170/03 also requires laboratories to report "a result indicating the presence of a pesticide not listed in Schedule 2 to the Ontario Drinking Water Quality Standards in a sample of drinking water at any concentration".

It has been brought to my attention that certain laboratories have reported the presence of Hexachlorocyclopentadiene (HCCPD) to the Ministry's Spills Action Centre as an adverse water quality incident (AWQI). The purpose of this letter is to provide laboratories with guidance when HCCPD is detected in an Ontario drinking water sample.

Hexachlorocyclopentadine (HCCPD) is an oily organic liquid with a pungent odour. It is an organochlorine compound that was used to manufacture pesticides such as Aldrin, Dieldrin, Endrin, Chlordane, Chlordecone, and Mirex. As per Ontario Regulation 169/03, there are established Ontario Drinking Water Quality Standards for Aldrin and Dieldrin but not for HCCPD. The use of Aldrin, Dieldrin, Endrin, Chlordane, Chlordecone as pesticides was banned in 1994 and the compounds were deemed to be hazardous waste.

HCCPD is not listed as an active ingredient in a pesticide formulation in either Health Canada's Pest Management Regulatory Agency (PMRA) Pesticide Product Database or in the Ministry's Pesticide Database. HCCPD may also be formed from disinfection practices at low but detectable levels and as a result may be detected when analyzing drinking water. However, its presence does not necessarily indicate that pesticides are present.

Since HCCPD is not listed as one of the prescribed standards under Ontario Regulation 169/03 nor is it considered to be a result indicating the presence of a pesticide, the detection of HCCPD in Ontario drinking water should not be considered to be an adverse water quality incident (AWQI) under section 16-3, Schedule 16 of O. Reg. 170/03. Consequently, reporting under

section 18 of the SDWA and corrective actions such as re-sampling under Schedule 17 or 18 of O. Reg. 170/03 are not required when HCCPD is detected.

The Ministry will continue to monitor AWQI reports of pesticides from laboratories to the Spills Action Centre.

Should you require any additional information regarding this particular issue or wish to confirm the applicability of other similar detectable contaminants, please contact Jennifer Koene, Supervisor, Laboratory Licensing and Compliance.

Carniny Moodie, Assistant Director Safe Drinking Water Branch