

## MOBILE CAMPS DRINKING WATER POLICY

PHP 400

### POLICY

All Mobile Camps are regulated by the Drinking Water Protection Act and Regulation as a prescribed water supply system (Section 1 DWPA; section 4 DWP Regulation). The Drinking Water Protection Act and Regulation replaced the Safe Drinking Water Regulation, Health Act and the "Silviculture Camp Standards" in May 2003, with respect to regulating the provision of safe drinking water at any mobile camp. Consequently, the mobile camp water system operator is also accountable to make reports, assessments and take training as specified by the Drinking Water Officer. This in addition to the requirements of previous legislation to: provide potable drinking water that is disinfected if taken from a surface source, obtain prior approval by the Medical Health Officer or delegate before using any water treatment or disinfection system, submit regular water sampling data, develop an emergency response plan and obtain an operating permit.

### BACKGROUND

Mobile Camp operations are also governed under the Industrial Camps Health Regulation (work camps only), Communicable Disease Regulation, Food Premises Regulation, Sanitary Regulations, and the Sewerage System Regulation of the Health Act. This policy addresses only the drinking water requirements for mobile camps that serve less than 500 people and operate for a maximum 3 months in a given location.

Because Mobile Camps are often remotely situated, and regularly relocate as frequently as every two weeks, it has been difficult for these camps to fully comply with various statutory requirements. Because of this, there has been in the past, both a reticence by some operators to divulge the location of these camps and for Environmental Health Officers to undertake an active surveillance of them.

In 1986, there was a large outbreak of Giardiasis in treeplanters drinking contaminated water from surface sources at various silviculture camps in the Prince George area. This necessitated a more intensive scrutiny of these operations and culminated in the creation of the "*Silviculture Contract Camp Standards*". This document was jointly prepared by the Ministries of Forests and Health to provide workable rules regarding health and safety at silviculture camps while preserving the general intent of the various overseeing health legislation. These standards were only legally applicable to camps operating under a Ministry of Forests contract and enforced by a Ministry of Forest contract officer in consultation with the Environmental Health Officer. Today however, most silviculture contracts are made directly with the forest industry companies.

While not enforced directly by a Ministry of Forests contract officer, the “*Silviculture Contract Camp Standards*” have been utilized by the silviculture industry as a standard of reference for all their camp operations. Unfortunately, while the “*Silviculture Contract Camp Standards*” may have been user-friendly for the industry, they do not reflect recent changes in health legislation such as the Food Premises Regulation or the new Drinking Water Protection Act and Regulation.

In 2004, the Ministry of Health Services consulted with small water system operators and other stakeholders at various locations in the province. The purpose of this consultation was to determine the most appropriate application of the Drinking Water Protection Act to very small water systems including those at mobile camps.

Also in 2004, Northern Health conducted a more intensive surveillance of silviculture camps and found that none of their water treatment equipment had been previously approved by the Medical Health Officer or delegate and that this equipment was inadequate in design or capacity. As well, water sampled from work camp water systems was often positive for coliform bacteria. As a result, all silviculture camps were ordered to use only hauled water from approved sources or to boil on-site water until such time as their water treatment systems had been reviewed and issued a construction permit under the Drinking Water Protection Act by the Regional Public Health Engineer (see *Silviculture Camps Draft Drinking Water System Design Guidelines*).

In December 2005, the Drinking Water Protection Regulation was amended to give more discretion to the Drinking Water Officer when dealing with small water systems. This has allowed a more flexible approach towards mobile camps possible. This policy was revised to take the changes into account.

## PROCEDURE/GUIDELINES

1. Environmental Health Officers should rely on the Drinking Water Protection Act and Regulation as well as the Drinking Water Officers' Guide as the authority and guidance in conducting an inspection of a mobile camp water system.
2. For the purpose of this policy, mobile camps are those that serve less than 500 people over the course of any 24-hour period and that will remain in one location less than a period of 3 months.
3. As a follow-up to the 2004 surveillance activities and the order regarding hauled or boiled water, no mobile work camp shall use any water supply equipment to provide drinking water unless that equipment has first been reviewed and issued a construction permit under the Drinking Water Protection Act by the Regional Public Health Engineer. The "Mobile Camps Drinking Water System Design Guidelines" document will provide further guidance, or the mobile work camp operator can phone the Regional Public Health Engineer at (250) 565-2150 for further information regarding standards for a mobile camp water supply system.
4. All mobile camps must provide potable water for consumption (drinking, culinary purposes and oral hygiene). Where a mobile camp is unable to disinfect or haul potable water in adequate amounts, the following options may be considered:
  - The mobile camp operator may haul potable water used only for drinking, culinary purposes and oral hygiene from an approved water system permitted under the Drinking Water Protection Act or use approved commercial bottled water or boil on-site water.
  - Point of use systems may be used to provide potable water for consumption.
  - The use of non-potable water for showering, ablution or laundry purposes provided that the non-potable water is supplied on a separate system or separated from the potable water system with adequate cross connection control measures, and that signs are posted at the location of these facilities, warning that the water is not safe to drink
5. All mobile camps require a valid operating permit issued under the Drinking Water Protection Act for each camp facility with a water treatment system used to provide on-site drinking water. A prerequisite for an operating permit is a construction permit, issued when the water supply system has been reviewed and approved. Operating Permits and Construction Permits are valid for specified periods. They are transferable between sites but not between water suppliers.

6. All mobile camps with approved water systems must submit at least one water bacteriology sample from the water system for each new location at set-up and at least one additional sample per month if remaining at that location. Camps without approved water treatment systems must collect at least one water bacteriology sample per month for its hauled or boiled water. The Drinking Water Leaders may allow different frequency where sending samples in a timely manner is impossible. They may also allow the samples to be tested in First Nations Inuit Health Branch (FNIHB) laboratories.
7. All mobile camps utilizing on-site water through a water treatment system or point of use system, should select a source that is protected from waste and sewage cross-contamination and must appear clean. Water from man-made ponds is generally not acceptable.
8. All mobile camp operators must develop an Emergency Response Plan for each camp. These can be based on the small water system template.
9. All mobile camp water systems must be operated by certified or trained water system operators. The Drinking Water Leaders will determine the types of training required. It is possible for the trained operator to be working off site or supervising more than one system; in that case, the Drinking Water Leaders may impose additional operating permit conditions to ensure that the operation is not unduly compromised.
10. During a mobile camp inspection, the Environmental Health Officer (EHO) should record the observations on a Drinking Water Inspection form and leave copies with the operator and the owner/contractor at the conclusion of the inspection.
11. Comprehensive or serious matters may require a follow-up letter.
12. Enforcement of repeated violations should follow Northern Health's progressive enforcement policy
13. The EHO may use a section 63, Health Act, health hazard order which can be followed by the use of violation tickets, but only if a health hazard has occurred. Otherwise the EHO or Drinking Water Leaders, acting as the drinking water officer delegates, should use a section 25, Drinking Water Protection Act hazard abatement/prevention order or a Boil Water Notice under section 14 of the Drinking Water Protection Act. The Medical Health Officer and Area Manager should be consulted before these steps are taken, unless the managers cannot be contacted immediately.