

To : John Slater,
MLA, Parliamentary Secretary for Water Supply and Allocation, Ministry of Environment.

Thank you for taking the time to talk on the phone. I have tried to summarize my thoughts and our conversation around my current predicament with the regulations.

Summary of my thoughts (A long version of each talking point follows this summary)

- Regulations and latest amendments place different requirements / standards for certified persons over those registered or grandfathered
- If point of certifying is to educate and have qualified people working on water systems why is any group exempt?
- That said, certification does not fix the problem of unqualified/unregistered individuals doing the work
- Saying only registered pump installers are allowed is completely unenforceable.
- Lack of knowledge, do it yourself, and lack of government oversight are common reasons for poor water systems
- If protecting drinking water is the goal something must be done to help contractors deal with people who own systems that are substandard
- Need to make compliance a Win-Win for customer and contractor
- For regulations to be meaningful and measurable there needs to be a registry requirement for every homes' water system (perhaps in form of water use license/permit)
- We must communicate with water system owners that they have responsibilities; they have to be part of the solution!!!

Recommendations

- Pump Inspections
- Control of pump sales
- Pump installation permit
- Mandatory site inspection for 'water use license/permit'

Long Version

Ground water Protection and Drinking Water Protection Regulations are not working for Hillside Pumps. Good regulations need to be meaningful, measurable and enforceable.

The latest amendments to the ground water regulation may put me out of business. Certified contractors like me now have to maintain our continuing education points or we will be removed from the registry of qualified pump installers. Grandfathered contractors are exempt with no requirements and therefore no expense. I will have yearly expenses including, membership dues, course fees, travel, meals, and accommodation and don't forget lost wages, while Grandpa has no expenses. It is impossible to compete with this. (It should also be noted that for me or anyone to bring on new staff they will have to be certified. Grandfathering is no longer an option.)

This past year has been slow, we did not feel we had the funds to attend and pay all the fees to keep our certification current, so come November I will be in violation of the amendments and could be looking for work....if the government chooses to enforce the amendments.

Grandfathered contractors are it appears exempt from any educational requirements. (Grandfathers are the vast majority and they are not old people who will retire soon) They do not have to attend meetings, take any courses, write any competency tests; it seems they can not be removed from the registry for any reason except dying of old age???? What is the point of regulations; or specifically, certification? Was it not to ensure we had educated and qualified people working on our water systems?

Certification does not fix the problem of unqualified and unregistered individuals doing work... the uneducated Grandfathered contractor or homeowner can continue unchecked with all their bad habits. Anyone can purchase everything they need without a license so really it is still the same as before for them. Regulations, for those of us who are certified, have turned out to be a lot more interesting. We have lots of changes, most of it expensive and less than helpful... Continuing Education is a big expense.... (By the way, the few certified contractors that are out there were the ones who put a little extra into their work hoping to raise the level of professionalism. Boy did that backfire on us!) All certification has done for me is increase my fixed costs and gives the Grandfathered contractor one more advantage.

I know that the regulations say only registered pump installers are allowed to do pump work but that is completely unenforceable. I know of lots of work going on by home owners and plumbers. It is a joke... Canadian Tire, Home Hardware, Burgess Plumbing Supplies, Emco and the list goes on, they all sell everything you need over the counter..... I have never had to use my pump installer registration number for anything. There is no operating permit, no well permit, and no inspections (unless I report something.)... These are only feel good regulations without a real plan to enforce regulations.

CHANGES ARE NEEDED. I do not think anyone would argue with that. Workable regulations are needed. How do we get there? Something is missing..... Something is wrong when there is no accountability.

We should talk about the Dog Creek road area. The Ministry of Environment has done a report. The area has all the classic water problems. How did it get this way? Who is to blame? How will the regulations help or hinder?

Lack of knowledge, do it yourself and lack of government oversight were the biggest problems in my opinion, and the regulations will do little to change it.

If protecting drinking water is the goal, we have to do something to help contractors deal with people who own systems that are not up to code. Budget considerations are often the deciding factor on how much a contractor can do. When we encounter a poorly constructed water system the enforcing of the regulations has to have some controls or reports. Contractors cannot be the policeman tasked with ensuring regulations are met. Sometimes a customer may need several years to get a system fixed. (they need time to save money) Sometimes the customer will go into denial, simply do nothing after we leave, shop elsewhere or try to patch it themselves. If there is no clear Government enforcement or follow up, corrections will not get done. Currently the regulations are focused on making the contractor responsible. The last one to touch it is responsible- this is not going to work!! Contractors need a place to report this system and then

walk away if needed.... We have to make compliance a win-win situation for the contractor and the customer. The customer needs to see a benefit or advantage to having his water system work done by qualified people.... need to bounce around more ideas.....perhaps permits and forms that needed a qualified person to complete would help in communicating in a orderly fashion with the customer.

I believe we need some debates and discussion around a good record keeping system for every home's water supply. The only way I see the regulations becoming meaningful and measurable is if we require something like a water user license or operating permit for every home. I know this is a touchy subject but a system needs to be devised to provide records. IT MUST CLEARLY COMUMUNICATE WITH WATER SYSTEM OWNERS THAT THEY HAVE RESPONSIBILITIES!! It needs to be for everyone - no exceptions!!!! Then there is no way to avoid it..... Every well is a potential pollution entry point into an aquifer. Water systems need to be inspected and certified as safe....otherwise Dog Creek Road type scenarios are going to keep happening!!! The tax payers cannot afford to ignore these situations; it is way too expensive to be trying to fix water quality issues after it is polluted. We need qualified, knowledgeable, professional people working on our water supply systems.

My thoughts / recommendations:

~ Needs to be inspections...not every job, that is too expensive and unnecessary, but contractors need to know someone could come and look at the job... This will keep everyone honest and working to protect water resources.

~ You will have to control pump sales in the province. To purchase a pump you would have to give your license number and submit a report where it was installed

~ An unlicensed individual would need to purchase an "installation permit" with the pump. (I would not tell people they could not buy or install their own pump. what I would do is require all uncertified people buy an installation permit before they could take a pump off the shelf. This permit would be expensive enough to cover all the time it takes to educate and inspect I would expect a minimum four to six hour inspection fee at \$100hr or more, so we are talking about a \$600 dollar type permit. I would propose that a licensed installer should only need spot checks so his cost could be we will say \$60 dollars so every 10th pump could be inspected.) (We could also consider using the permit fee to pay another contractor to do the inspection on a home owner when a government person is not available)

~ All pumps would be recorded and could be randomly inspected. (Unlicensed people would have a mandatory inspection)

~ Mandatory inspections of water systems to renew water use license/permit could be a good tool to check for.....things like (I would see a contractor doing this something like the cross control regulations)

~ Well Cap

~ Well and Sewer system location - general site inspection

~ Water quality test

~ Water system plumbing and cross connection review - Pressure tank etc.

~Too many old water systems out there are dangerous to the neighbourhood (read the Dog creek road report)- we need to make them come out of hiding.... to protect people from them self ...to protect people from the neighbours dangerous well and tax payers from big remediation projects.

~old abandoned wells need to be recorded and an economical program found to get rid of them.
(The current plan is going to have people hiding the old wells this is not good!)

In our discussions of the above points we need to look at how the aircraft industry does annual inspections or issues certificates of airworthiness. Another place to look would be the commercial trucking industries regulation. We need a process. We need it to be effective, fair, and enforceable. We also need to do it with as little money and bureaucracy as possible:

I would welcome any questions and comments or suggestions.

Thank you,

Peter Epp

Certified Plumber, Pump Installer, Small Water System Operator 20 years as owner of Hillside Pumps & Water Treatment,

1613A South lakeside Dr. Williams Lake, B.C. V2G 3A8 250-392-7876

email pumppuller@gmail.com.

Donna Barnet, MLA, Cariboo Chilcotin

Mike Wei, Ministry of Environment

BCGWA ; Bruce Ingimundson, managing-director@bcgwa.org

Interior Health; Curtis G. Neville, P.Eng. curtis.neville@interiorhealth.ca

Fraser Health; Dean Scovill, Drinking Water Program dean.scovill@fraserhealth.ca