Ministry of the Environment and Climate Change

Safe Drinking Water Branch

Guelph District Office
4th Floor
1 Stone Road West
Guelph, Ontario N1G 4Y2

Ministère de l'Environnement et de l'Action en matière de changement climatique

Direction du contrôle la qualité de l'eau potable

Bureau du district de Guelph
4e étage
1, chemin Stone Ouest
Guelph (Ontario) N1G 4Y2

Ontario

August 25, 2015

The Corporation of the Township of Mapleton
7275 Sideroad 16
Drayton, ON
N0G 1P0

Attention: Mr. Brad McRoberts
Director of Public Works

RE: 2015-16 Inspection Report for the Drayton Drinking Water System

Dear Mr. McRoberts,

I would like to thank you and the team at the Ontario Clean Water Agency for the assistance provided to me during my recent inspection of the Drayton Drinking Water System (DWS # 220004064). Attached is the final report for this inspection, with inspection report number 1-BZLHQ.

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 Inspector's Annual Report. If you have any questions or concerns regarding the rating, please contact Lisa Williamson, Drinking Water Program Supervisor, at 519-837-6386.

Feel free to contact me at (519) 826-4274 if you have any questions related to this inspection.

Best regards,

Martha Weber
Provincial Officer
Water Inspection Program
Guelph District Office

Cc via email: Scott Craggs, West Highlands Hub, OCWA
Lisa Benoit, West Highlands Hub, OCWA
Shawn Zentner, Wellington-Dufferin-Guelph Health Unit
Sandra Cooke, Grand River Conservation Authority
District Office File (SI WE MA WO 540)

Ministry of the Environment and Climate Change

DRAYTON DRINKING WATER SYSTEM

Inspection Report

Site Number:	220004064
Inspection Number:	1-BZLHQ
Date of Inspection:	Jul 10, 2015
Inspected By:	Martha Weber

Ontario

Drayton Drinking Water System
DWS# 220004064
2015/16 Focused Inspection Report

TABLE OF CONTENTS:

APPENDICES:

OWNER INFORMATION:

Company Name:	MAPLETON, THE CORPORATION OF THE TOWNSHIP OF		
Street Number:	7275	**Unit Identifier:**	
Street Name:	SIDEROAD 16 Rd		
City:	DRAYTON		
Province:	ON	**Postal Code:**	N0G 1P0

CONTACT INFORMATION

Type:	Owner	**Name:**	Brad McRoberts
Phone:	(519) 638-3313 x41	**Fax:**	(519) 638-5113
Email:	bmcroberts@mapleton.ca		
Title:	Director of Public Works		

Type:	Operating Authority	**Name:**	Scott Craggs
Phone:	(519) 941-1938 x228	**Fax:**	(519) 941-1794
Email:	scraggs@ocwa.com		
Title:	OCWA - Operations Manager		

Type:	Operator	**Name:**	Lisa Benoit
Phone:	(519) 941-1938 x225	**Fax:**	(519) 941-1794
Email:	lbenoit@ocwa.com		
Title:	Process and Compliance Technician		

INSPECTION DETAILS:

Site Name:	DRAYTON DRINKING WATER SYSTEM
Site Address:	60 WOOD ST DRAYTON N0G 1P0
County/District:	Mapleton
MOECC District/Area Office:	Guelph District
Health Unit:	WELLINGTON-DUFFERIN-GUELPH HEALTH UNIT
Conservation Authority	N/A
MNR Office:	N/A
Category:	Large Municipal Residential
Site Number:	220004064
Inspection Type:	Announced
Inspection Number:	1-BZLHQ
Date of Inspection:	Jul 10, 2015
Date of Previous Inspection:	Sep 18, 2014

COMPONENTS DESCRIPTION

Site (Name): WELL 1 RAW
Type: Source **Sub Type:** Ground
Comments:
Well 1 is a 66.3 m deep, 250 mm diameter drilled groundwater well located within the pumphouse at 60 Wood Street. According to Water Well Record 6700125, Well 1 was drilled in 1967. It is equipped with a submersible pump rated at 1,364 L/min at a total dynamic head of 37.0 m, sanitary well seal, depth gauge and bubbler tube system for monitoring. Flow from Well 1 is monitored via a propeller flow meter. Well 1 is not considered to be under the direct influence of surface water.

Site (Name): WELL 2 RAW
Type: Source **Sub Type:** Ground
Comments:
Well 2 is a 67.1 m deep 250 mm diameter drilled groundwater well located within the pumphouse at 60 Wood Street. According to Water Well Record 6707970, Well 2 was drilled in 1984. It is equipped with a submersible pump rated at 1,364 L/min at a total dynamic head of 37.0 m, sanitary well seal, depth gauge and bubbler tube system for monitoring. Flow from Well 2 is monitored via a propeller flow meter. Well 2 is not considered to be under the direct influence of surface water.

Site (Name): PUMPHOUSE TREATED
Type: Treated Water POE **Sub Type:** Pumphouse
Comments:
The well pumphouse, located at 60 Wood St., contains the treatment and control facilities. Treatment consists of iron sequestration and disinfection via chlorination. The iron sequestration system is comprised of a 50L sodium silicate solution tank, two chemical metering pumps (one dedicated to each well), and feed lines injecting prior to the sodium hypochlorite injection.

The disinfection system is comprised of one 200L sodium hypochlorite solution tank, two chemical metering pumps (one dedicated to each well), and feed lines injecting prior to a common header that discharges into the reservoir.

Chlorine contact time is provided in a 405 m³ in-ground reservoir with four cells that can be individually isolated for maintenance purposes. During normal operating conditions, chlorinated raw water enters cell 1 and continues through to cells 2, 3 and 4 before one of the high lift pumps, drawing water from cell 4, directs the treated water into the distribution system. During fireflow only, two high lift pumps (#4 & #5) draw water from cell 3; CT calculations have been completed for this situation. Each reservoir cell has an access hatch, and there are two screened air vents.

Five high lift pumps are available to deliver treated water to the distribution system. Pumps 1 and 2 are submersible pumps, each rated at a capacity of 15 L/s at a total dynamic head (TDH) of 61.3 m. Pump 3, which is typically not used, is a vertical turbine pump rated at a capacity of 45 L/s at a TDH of 61.3 m. Pump 4 is rated at 13 L/s at a TDH of 61.3 m. Pump 5 is a vertical turbine pump rated at a capacity of 45 L/s. A potential bypass exists at the line from well #2 that discharges into reservoir cell 3. The valve is locked and is labelled as a potential disinfection bypass and that it is to not be opened without notification to the Overall Responsible Operator.

Emergency power is delivered via a 150 kW diesel generator complete with an automatic transfer switch.

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

Comments:

The distribution system was installed in 1987 and is reported to consist mainly of PVC pipes. There are approximately 1880 residents connected to the distribution system. There are 51 fire hydrants and 102 valves in the system. There are currently no storage structures in the distribution system.

Site (Name): MOE DWS Mapping

Type: DWS Mapping Point **Sub Type:**

Comments:

Not Applicable

INSPECTION SUMMARY

INTRODUCTION

* **The primary focus of this inspection is to confirm compliance with Ministry of the Environment and Climate Change (MOECC) legislation as well as evaluating conformance with ministry drinking water related policies and guidelines during the inspection period. The ministry utilizes a comprehensive, multi-barrier approach in the inspection of water systems that focuses on the source, treatment and distribution components as well as management practices.**

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 a "focused" inspection of the system. Although the inspection involved fewer activities than those normally undertaken in a detailed inspection, it contained critical elements required to assess key compliance issues. This system was chosen for a focused inspection because the system's performance met the ministry's criteria, most importantly that there were no deficiencies as identified in O.Reg. 172/03 over the past 3 years. The undertaking of a focused inspection at this drinking water system does not ensure that a similar type of inspection will be conducted at any point in the future.

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 Drayton Drinking Water System is owned by the Township of Mapleton and operated by the Ontario Clean Water Agency (OCWA). This inspection report covers a review period of September 1, 2014 to June 30, 2015. Municipal Drinking Water Licence (MDWL) #105-101 was issued December 17, 2010 and expires December 16, 2015. Drinking Water Works Permit (DWWP) #105-201 was issued December 16, 2010. The application to renew the MDWL was submitted to the Ministry in June 2015.

Permit to Take Water (PTTW) 0758-98MLKT includes both productions wells and was issued on June 18, 2013.

Classification Certificate #1578, dated April 27, 2009, deems this system a Class 2 Water Distribution and Supply Subsystem.

SOURCE

* **The owner was maintaining the production well(s) in a manner sufficient to prevent entry into the well of surface water and other foreign materials.**

* **Measures were in place to protect the groundwater and/or GUDI source in accordance with a Permit and Licence or Approval issued under Part V of the SDWA.**

According to Water Well Record #6707970, the annular space for Well 2 is filled with neat cement grout from ground level to 30 feet below grade. Water Well Record #6700125 does not contain information on an annular seal for Well 1, however the water quality history does not indicate a surface water influence.

Sections 16.2.7 - 16.2.9 of Schedule B in the MDWL requires that an inspection schedule for all wells associated with the drinking water system be included in the operations and maintenance

SOURCE

manual. There must be inspection and maintenance procedures for the entire well structure of each well including all above and below grade components, and remedial action plans for situations where an inspection indicates non-compliance with respect to regulatory requirements and/or risk to raw well water quality.

OCWA has established a well inspection program that requires inspections of the production wells on monthly, 5 year, and 10 year timelines. The 10 year inspection includes a detailed assessment of the well, including below grade components.

CAPACITY ASSESSMENT

* **There was sufficient monitoring of flow as required by the Permit and Licence or Approval issued under Part V of the SDWA**

  Schedule C of the Municipal Drinking Water Licence requires continuous measuring and recording of flow from treatment into the distribution system (Section 2.1.1) and from the wells into the treatment subsystem (Section 2.1.2). Raw water monitoring is achieved via propeller flow meters and flow of treated water being directed to the distribution system is monitored via a magnetic flow meter. It is noted that the Fire Pump (high lift pump 5) pumps treated water from cell 3 of the reservoir and directs the water into the distribution system at a location in the header pipe which is downstream of the magnetic flow meter and is therefore not measured. OCWA has developed a procedure to estimate any water pumped from HL5 under fire flow conditions. This procedure uses the hour meter and pump capacity and these values are recorded on daily log sheets. The fact that HL5 is not metered is detailed in the Drinking Water Works Permit, with the description that it is used for fire flow and maintenance only.

* **The owner was in compliance with the conditions associated with maximum flow rate or the rated capacity conditions in the Permit and Licence or Approval issued under Part V of the SDWA.**

  Section 1 of Schedule C in the Municipal Drinking Water Licence allows a rated capacity from the treatment system into the distribution system of 3,928 m³/day. A review of flow records showed that there were no exceedances of the rated capacity during the review period.

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.**

* **Records indicated that the treatment equipment was operated in a manner that achieved the design capabilities required under Ontario Regulation 170/03 or a Permit, Licence or Approval issued under Part V of the SDWA at all times that water was being supplied to consumers.**

  The Drayton Drinking Water System obtains water from ground water sources. The treatment system consists of disinfection using chlorine and is capable of achieving an overall performance that provides, at a minimum, 2-log (99%) removal or inactivation of viruses prior to the first consumer. The minimum required CT value for this system has been determined to be 3 mg/L·min, and a free chlorine residual of 0.10 mg/L has been deemed to be the minimum level required to achieve the required CT, with a goal of a minimum operating free chlorine residual of 0.8 mg/L. A review of records shows that the required treatment was provided at all times water was being provided to consumers.

* **Records confirmed that the water treatment equipment which provides chlorination or chloramination for secondary disinfection purposes was operated so that at all times and all locations in the distribution system the chlorine residual was never less than 0.05 mg/l free or 0.25 mg/l combined.**

TREATMENT PROCESSES

* **The Operator-in-Charge had ensured that all equipment used in the processes was monitored, inspected, and evaluated.**

TREATMENT PROCESS MONITORING

* **Primary disinfection chlorine monitoring was being conducted at a location approved by Permit, Licence or Approval issued under Part V of the SDWA, or at/near a location where the intended CT had just been achieved.**

  Continuous chlorine residual monitoring occurs after treated water has left the treatment tank in which primary disinfection occurs.

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

  O. Reg. 170/03, Schedule 7, Section 7.2 requires at least seven distribution samples to be taken each week and tested immediately for chlorine residual. Unless one sample is taken on each day of the week, there is a requirement for at least 48 hours to pass between the sets of four samples and three samples used to complete the seven sample requirement. OCWA operators conduct daily distribution residual monitoring, and records indicate this monitoring was completed every day of the inspection review period.

* **Operators were examining continuous monitoring test results and they were examining the results within 72 hours of the test.**

  Operators follow the SOP G-48 "Downloading/Reviewing of Continuous Monitoring Data". Data is typically reviewed at the pumphouse on a daily basis.

* **All continuous monitoring equipment utilized for sampling and testing required by O. Reg. 170/03, or approval or order, were equipped with alarms or shut-off mechanisms that satisfied the standards described in Schedule 6.**

  Low chlorine residual alarms are programmed to alert the operator if the treated free chlorine residual level drops to 0.5 mg/L. In addition, if the residual drops to 0.5 mg/L, the raw well pumps will lock out and cease to pump water into the disinfection tank. At the time of inspection, the low chlorine residual alarm and raw well pump lock-out were tested and found to be working as expected.

* **Continuous monitoring equipment that was being utilized to fulfill O. Reg. 170/03 requirements was not performing tests for the parameters with at least the minimum frequency specified in the Table in Schedule 6 of O. Reg. 170/03 and/or was not recording data with the prescribed format.**

  During the majority of the inspection review period, continuous monitoring equipment was performing tests and recording data with the prescribed format. However, there was one 9 minute gap in recorded data from October 23, 2014. Disinfection is believed to have been provided at the time, but the recorded data was lost due to a computer malfunction. There is a history of data loss issues at this facility, and the Township has committed to upgrade the equipment to help prevent future data loss events. Approval has been given in the budget for implementing a SCADA system at this drinking water works, and the Township and Operating Authority are working together with consultants to determine the best system for Drayton.

  REQUIRED ACTIONS: The Township is to provide a written update to the undersigned officer within two weeks of installation of the proposed SCADA system.

* **All continuous analysers were calibrated, maintained, and operated, in accordance with the manufacturer's instructions or the regulation.**

OPERATIONS MANUALS

OPERATIONS 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 did meet the requirements of the Permit and Licence or Approval 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.**

SECURITY

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

CERTIFICATION AND TRAINING

* **The overall responsible operator had been designated for each subsystem.**

* **Operators in charge had been designated for all subsystems which comprised the drinking-water system.**

* **Only certified operators made adjustments to the treatment equipment.**

WATER QUALITY MONITORING

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

  For the population of approximately 1,800 residents, O.Reg 170/03, Section 10-2 of Schedule 10 requires at least nine distribution samples to be taken every month, with at least one of the samples being taken in each week. These samples are to be tested for E. coli and total coliforms, and 25 percent of the samples are to be tested for general bacteria population expressed as colony counts on a heterotrophic plate count. A review of sampling records shows that samples were taken and tested as required, with sample numbers going above and beyond the minimum requirements every month.

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

  In O.Reg 170/03, Section 10-3 of Schedule 10 requires a treated sample be taken at least once every week and be tested for E. coli, total coliforms and general bacteria population expressed as colony counts on a heterotrophic plate count. A review of records shows that samples were taken as required.

* **All inorganic water quality monitoring requirements prescribed by legislation were conducted within the required frequency.**

  Sampling for inorganic parameters was last conducted on January 8, 2013.

WATER QUALITY MONITORING

* **All organic water quality monitoring requirements prescribed by legislation were conducted within the required frequency.**

  Sampling for organic parameters was last conducted on January 8, 2013.

* **All trihalomethanes water quality monitoring requirements prescribed by legislation were conducted within the required frequency.**

  The latest Running Annual Average was calculated to be 14 µg/L.

* **All nitrate/nitrite water quality monitoring requirements prescribed by legislation were conducted within the required frequency for the DWS.**

* **All sodium water quality monitoring requirements prescribed by legislation were conducted within the required frequency.**

  Sodium sampling was last conducted on September 11, 2013.

* **All fluoride water quality monitoring requirements prescribed by legislation were conducted within the required frequency.**

  Fluoride sampling was last conducted on September 11, 2013.

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

  For the 2014 sampling periods, samples were taken in the distribution system at two locations and tested for lead, pH, and alkalinity. As such, the 2015 sampling periods are required to have distribution sites tested for pH and alkalinity only. This sampling was conducted on April 13, 2015 for the December 15, 2014 to April 15, 2015 sampling period, and this sampling is scheduled to take place again for the June 15 to October 15, 2015 sampling period.

* **Records confirmed that chlorine residual tests were being conducted at the same time and at the same location that microbiological samples were obtained.**

WATER QUALITY ASSESSMENT

* **Records show that all water sample results taken during the review period met the Ontario Drinking Water Quality Standards (O. Reg. 169/03).**

REPORTING & CORRECTIVE ACTIONS

* **Where required continuous monitoring equipment used for the monitoring of chlorine residual and/or turbidity triggered an alarm or an automatic shut-off, a qualified person responded in a timely manner and took appropriate actions.**

OTHER INSPECTION FINDINGS

* **The following instance(s) of non-compliance were also noted during the inspection:**

  Schedule C of the Municipal Drinking Water Licence requires continuous measuring and recording of the flow rate and daily volume from treatment into the distribution system (Section 2.1.1) and flow rate and daily volume from the wells into the treatment subsystem (Section 2.1.2). For Drayton, flow rates are documented via a chart recorder system, and daily volumes are recorded via calculating the difference in readings from each flow meter's totalizer.

OTHER INSPECTION FINDINGS

A review of the chart recorder discs during the inspection showed three days during which the recording pen had run out of ink, resulting in a failure to record the required treated flow rates for almost the entire day during these dates (December 14 and 15, 2014, and February 20, 2015). Both instantaneous flow rates and totalized daily volumes should be measured.

UPDATE: As part of a plant upgrade, the Township of Mapleton, OCWA, and consultants are in the process of purchasing a SCADA system for monitoring and recording data from this facility, including flows, for which budget approval has already been given. The new system is intended to improve record keeping at the system, and is proposed to include replacing the chart recording system.

REQUIRED ACTIONS: The Township shall provide notice to the undersigning officer within two weeks of completion of installation of the proposed SCADA system.

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.

1. **Continuous monitoring equipment that was being utilized to fulfill O. Reg. 170/03 requirements was not performing tests for the parameters with at least the minimum frequency specified in the Table in Schedule 6 of O. Reg. 170/03 and/or was not recording data with the prescribed format.**

   During the majority of the inspection review period, continuous monitoring equipment was performing tests and recording data with the prescribed format. However, there was one 9 minute gap in recorded data from October 23, 2014. Disinfection is believed to have been provided at the time, but the recorded data was lost due to a computer malfunction. There is a history of data loss issues at this facility, and the Township has committed to upgrade the equipment to help prevent future data loss events. Approval has been given in the budget for implementing a SCADA system at this drinking water works, and the Township and Operating Authority are working together with consultants to determine the best system for Drayton.

   Action(s) Required:
   The Township is to provide a written update to the undersigned officer within two weeks of installation of the proposed SCADA system.

2. **The following instance(s) of non-compliance were also noted during the inspection:**

   Schedule C of the Municipal Drinking Water Licence requires continuous measuring and recording of the flow rate and daily volume from treatment into the distribution system (Section 2.1.1) and flow rate and daily volume from the wells into the treatment subsystem (Section 2.1.2). For Drayton, flow rates are documented via a chart recorder system, and daily volumes are recorded via calculating the difference in readings from each flow meter's totalizer.

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   Action(s) Required:
   The Township shall provide notice to the undersigning officer within two weeks of completion of installation of the proposed SCADA system.

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:	Signature: (Provincial Officer):
Martha Weber	
Reviewed & Approved By:	Signature: (Supervisor):
Lisa Williamson	
Review & Approval Date:	25-Aug-2015

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 - 2015-2016)

DWS Name:	DRAYTON DRINKING WATER SYSTEM
DWS Number:	220004064
DWS Owner:	Mapleton, The Corporation Of The Township Of
Municipal Location:	Mapleton
Regulation:	O.REG 170/03
Category:	Large Municipal Residential System
Type Of Inspection:	Focused
Inspection Date:	July 10, 2015
Ministry Office:	Guelph District

Maximum Question Rating: 450

Inspection Module	Non-Compliance Rating
Source	0 / 28
Capacity Assessment	0 / 30
Treatment Processes	0 / 77
Operations Manuals	0 / 28
Logbooks	0 / 14
Certification and Training	0 / 28
Water Quality Monitoring	0 / 112
Reporting & Corrective Actions	0 / 21
Other Inspection Findings	0 / 0
Treatment Process Monitoring	21 / 112
TOTAL	21 / 450

Inspection Risk Rating	4.67%

FINAL INSPECTION RATING:	95.33%

Inspection Rating Record Generated On 25-AUG-15 (Inspection ID: 1-BZLHQ).

DWS Name:	DRAYTON DRINKING WATER SYSTEM
DWS Number:	220004064
DWS Owner:	Mapleton, The Corporation Of The Township Of
Municipal Location:	Mapleton
Regulation:	O.REG 170/03
Category:	Large Municipal Residential System
Type Of Inspection:	Focused
Inspection Date:	July 10, 2015
Ministry Office:	Guelph District

Non-compliant Question(s)	Question Rating
Other Inspection Findings	
In the event that an issue of non-compliance outside the scope of this inspection protocol is identified, a "No" response may be used if further actions are deemed necessary (and approved by the DW Supervisor) to facilitate compliance.	0
Treatment Process Monitoring	
Is continuous monitoring equipment that is being utilized to fulfill O. Reg. 170/03 requirements performing tests for the parameters with at least the minimum frequency specified in the Table in Schedule 6 of O. Reg. 170/03 and recording data with the prescribed format?	21
TOTAL QUESTION RATING	21

Maximum Question Rating: 450

Inspection Risk Rating	4.67%

FINAL INSPECTION RATING:	95.33%