2025 Summary Report

for the

Town of Minto

PALMERSTON DRINKING WATER SYSTEM

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Date: March 5, 2026

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1.0 INTRODUCTION

1.1 Background

In December 2002, the Safe Drinking Water Act (SDWA) was enacted. Subsequently, on June 1, 2003, under the SDWA, a new *'Drinking-Water Systems Regulation'*, Ontario Regulation 170/03 (O. Reg. 170/03), was enacted. In addition, several supporting regulations and procedures were also enacted to assist with the administration of O. Reg 170/03. The list of relevant drinking-water legislation is presented in Appendix A.

The SDWA identifies the responsibilities of owners and operating authorities of municipal drinking water systems (SDWA, Sections 11 and 19). Their duties include ensuring that:

- All water provided by the drinking-water system meets prescribed drinking-water quality standards;
- The drinking-water system is operated in accordance with the Act and regulations and is kept in a good state of repair;
- All facilities are appropriately staffed and supervised;
- All sampling, testing and monitoring requirements are complied with;
- All reporting requirements are complied with; and
- Only persons holding valid operator's certificates operate the drinking-water-system.

O. Reg. 170/03 establishes the standard for protection of drinking water. It includes sets of schedules, specific to municipal residential systems that define requirements for:

- Minimum treatment levels;
- Operational checks;
- Chemical and microbiological sampling and testing;
- Adverse results reporting;
- Corrective procedures; and
- Report documentation and retention.

The system's Municipal Drinking Water Licence (MDWL), Drinking Water Works Permit (DWWP) and Permit To Take Water (PTTW) imposes system specific rules and conditions applicable to the standards set out in O. Reg. 170/03.

1.2 Objective

This Summary Report for the Palmerston Drinking Water System is being prepared in fulfillment of Schedule 22 of O. Reg. 170/03 and will be given to members of the Municipal Council. This report covers the period from January 1, 2025 to December 31, 2025.

This Summary Report lists any requirements of the Act, the regulations, the PTTW, the MDWL, the DWWP and any order that the system failed to meet, during the period of this report. For any such failure, the measures that were taken to correct the failure are detailed. The report also includes relevant information that will assist the Town of Minto to assess the water work's capability to meet existing and future planned uses of the system.

1.3 Description of Drinking Water System

Palmerston is located in the Town of Minto within the northwest corner of Wellington County, along the route of Provincial Hwy. No. 23.

The Palmerston Drinking Water System services a permanent population of approximately 3,100, comprised of approximately 1,210 residential households, as well as Industrial, Commercial and Institutional sectors. The municipal water system is also used for fire protection.

Palmerston is currently serviced by a waterworks that consists of: four drilled bedrock wells, two wellhouses, an elevated 2500 m^3 steel storage tank and a distribution network of watermains, ranging in diameter from 100 mm to 350 mm. There are approximately 119 fire hydrants in the Town of Palmerston. In the event of a prolonged power outage, two portable generators are available for either wellhouse to supply back-up power.

The bedrock wells are equipped with submersible pumps that discharge directly into the William Street Wellhouse (Wells #1 and #2) and the Whites Road Wellhouse (Well #3 and #4). In the wellhouse, the raw water supply is injected with 12% sodium hypochlorite for disinfection and the chemical PW1680 for iron sequestering. The treated water leaves the pumphouse and enters an underground contact pipe and is discharged into the distribution system after adequate contact time is achieved.

The wells are controlled (*start/stop*) automatically based on elevated storage tank liquid levels and pressures in the distribution system. Each wellhouse is equipped with alarms for high & low free chlorine residuals (*and corresponding lockout of well pumps*), low water level and intrusion. Each wellhouse has a continuous monitoring analyzer for chlorine.

SCADA provides continuous monitoring for the Palmerston Drinking Water System.

The Palmerston Drinking Water System operates under MDWL 106-103 Issue 4, DWWP 106-203 Issue 4 and PTTW #8341-BZLRR9.

2.0 SUMMARY OF UPGRADES

2.1 Upgrades Completed in 2025

The disinfection treatment system in the Palmerston Drinking Water System meets all of the standards imposed by O. Reg. 170/03 and the MECP's "*Procedures for Disinfection of Drinking Water in Ontario*".

Typically, maintaining the system includes repairs and/or replacement of individual components as necessary. In 2025 $110,555 was spent on Well Exploration, $8,060 on a flow meter for Well #3, $4,060 to complete the Whites Road watermain replacement, $10,890 to complete the Derby Street watermain project and $114,465 in preparation to replace watermain on Main Street.
The following purchases were made to be shared between all of Minto's water systems. The following purchases were made to be shared between all of Minto's water systems. $13,605 on water meters, $490 on tablet replacements, $3,770 on the SCADA system and $12,730 on the Rate Study and Financial Plan.

Preventative maintenance measures are being followed to ensure proper operation of the Drinking Water System.

All routine maintenance throughout the year and planned maintenance during the monthly scheduled maintenance programs was completed by Minto Operations Staff.

2.2 Upgrades Scheduled to be Completed in 2026

In 2026, the Town of Minto is planning to spend $30,000 for water tower inspection and a climbing apparatus, $50,000 on well exploration, $30,000 on below grade inspections at Wells #3 & #4 and $2,335,000 on Main St. Watermain replacement.
The following will also be purchased to be shared within the water department. $28,500 for the Studies and Data Loggers. $110,000 on the SCADA monitoring system, $20,000 for water meters, $15,000 on pumps and or valves and $10,000 for chloring dosing boards.

3.0 OPERATION OF THE DRINKING WATER SYSTEM

3.1 Summary of the Quantities and Flow Rates of Water Supplied

O. Reg. 170/03 stipulates that a summary of the quantities and flow rates of the water supplied from each of Palmerston's wells be included in the Summary Report. Tables 3.1, 3.2, 3.3 and 3.4 provide a summary of quantities and flow rates supplied during 2025 for Wells #1, #2, #3 and #4 respectively, on a monthly basis. Wells #1 and #2 supply the William Street Wellhouse and wells #3 and #4 supply the White's Road Wellhouse.

Table 3.1
Palmerston Drinking Water System – Well #1
Treated Water Flow, Turbidity, and Disinfectant Residual
January 1, 2025 – December 31, 2025

	Raw Water Flow (Max Flow Rate = 22.8 L/s)			Chlorine	Monthly Averages				Distribution System Disinfectant
					Treated Water Turbidity		Treated Water Disinfectant Point of Entry		
Month	Operator Observed Peak Flow (L/s)	Maximum Day Flow (m^3/day)	Monthly Total (m^3)	Monthly Total (L)	No. of Samples Collected	Monthly Average Turbidity (NTU)	No. of Treated Samples Collected	Monthly Average Residual (mg/L)	No. of Samples Collected
January	15.0	142	2,691	45	4	0.52	31	1.40	See Palmerston Well #2 Data
February	15.0	185	2,561	66	4	0.53	28	1.29	
March	15.0	165	2,661	43	5	0.61	31	1.32	
April	15.0	209	2,473	66	4	0.56	30	1.37	
May	15.0	139	2,414	44	4	0.53	31	1.37	
June	15.0	170	2,832	66	5	0.48	30	1.34	
July	15.0	224	2,380	52	5	0.60	25	1.21	
August	15.0	200	2,688	67	4	0.55	31	1.36	
September	15.1	217	2,635	48	5	0.56	30	1.33	
October	15.1	257	2,644	42	4	0.69	31	1.20	
November	15.1	129	2,265	55	4	0.70	30	1.30	
December	15.1	139	2,345	68	5	0.63	31	1.22	
Total			30,588	662	53		359		
Average			2,549			0.58		1.31	
Maximum	15.1	257							

Disinfectant Compound Used: **12% Sodium Hypochlorite**
Form of Residual Displayed: **Free**
Quantity of Disinfectant Used During 2025**: 662 L**
Distribution System Minimum Target Residual: **0.2 mg/L**

Table 3.2
Palmerston Drinking Water System – Well #2
Treated Water Flow, Turbidity, and Disinfectant Residual
January 1, 2025 – December 31, 2025

	Raw Water Flow (Max Flow Rate = 22.8 L/s)			Chlorine	Monthly Averages				Distribution System Disinfectant
					Treated Water Turbidity		Treated Water Disinfectant Point of Entry		
Month	Operator Observed Peak Flow (L/s)	Maximum Day Flow (m^3/day)	Monthly Total (m^3)	Monthly Total (L)	No. of Samples Collected	Monthly Average Turbidity (NTU)	No. of Treated Samples Collected	Monthly Average Residual (mg/L)	No. of Samples Collected
January	17.8	399	8,680	154	4	0.47	31	1.36	49
February	17.6	347	7,482	155	4	0.54	28	1.34	43
March	17.7	409	8,665	151	5	0.51	31	1.26	48
April	17.8	540	8,405	173	4	0.46	30	1.21	44
May	17.5	553	9,406	177	4	0.51	31	1.21	48
June	17.3	520	11,411	219	5	0.42	30	1.23	49
July	17.3	1304	15,611	325	6	0.41	28	1.24	46
August	17.2	810	18,301	349	4	0.40	31	1.31	47
September	17.3	769	17,498	318	5	0.51	30	1.36	48
October	17.3	699	14,450	330	4	0.54	31	1.34	49
November	17.6	357	8,074	141	4	0.59	30	1.31	43
December	17.7	497	8,802	172	5	0.41	31	1.29	48
Total			136,787	2,664	54		362		562
Average	17.5		11,399			0.48		1.29	
Maximum		1,304							

Disinfectant Compound Used: **12% Sodium Hypochlorite**
Form of Residual Displayed: **Free**
Quantity of Disinfectant Used During 2025: **2,664 L**
Distribution System Minimum Target Residual: **0.2 mg/L**

Table 3.3
Palmerston Drinking Water System – Well #3
Treated Water Flow, Turbidity, and Disinfectant Residual
January 1, 2025 – December 31, 2025

	Raw Water Flow (Max Flow Rate = 26.7 L/s)			Chlorine	Monthly Averages				Distribution System Disinfectant
					Treated Water Turbidity		Treated Water Disinfectant Point of Entry		
Month	Operator Observed Peak Flow (L/s)	Maximum Day Flow (m^3/day)	Monthly Total (m^3)	Monthly Total (L)	No. of Samples Collected	Monthly Average Turbidity (NTU)	No. of Treated Samples Collected	Monthly Average Residual (mg/L)	No. of Samples Collected
January	18.2	350	8,442	220	4	0.51	31	1.33	See Palmerston Well #2 Data
February	18.4	331	7,091	220	4	0.45	28	1.30	
March	18.2	357	8,162	195	5	0.55	31	1.28	
April	18.2	497	8,520	236	4	0.50	30	1.21	
May	17.9	624	11,420	310	4	0.43	31	1.28	
June	17.8	642	12,576	334	5	0.53	30	1.24	
July	11.1	111	310	355	4	0.82	4	1.14	
August	12.1	855	3,770	342	5	0.76	9	1.52	
September	18.8	821	18,988	472	5	0.46	30	1.41	
October	19.0	930	16,629	355	4	0.56	31	1.35	
November	18.7	408	8,569	199	4	0.46	30	1.33	
December	18.7	508	9,085	197	5	0.49	31	1.32	
Total			113,564	3,435	53		316		
Average	17.3		9,464			0.54		1.31	
Maximum		930							

Disinfectant Compound Used: **12% Sodium Hypochlorite**
Form of Residual Displayed: **Free**
Quantity of Disinfectant Used During 2025: **3,435 L**
Distribution System Minimum Target Residual: **0.2 mg/L**

Table 3.4
Palmerston Drinking Water System – Well #4
Treated Water Flow, Turbidity, and Disinfectant Residual
January 1, 2025 – December 31, 2025

	Raw Water Flow (Max Flow Rate = 26.7 L/s)			Chlorine	Monthly Averages				Distribution System Disinfectant
					Treated Water Turbidity		Treated Water Disinfectant Point of Entry		
Month	Operator Observed Peak Flow (L/s)	Maximum Day Flow (m^3/day)	Monthly Total (m^3)	Monthly Total (L)	No. of Samples Collected	Monthly Average Turbidity (NTU)	No. of Treated Samples Collected	Monthly Average Residual (mg/L)	No. of Samples Collected
January	19.4	164	3,064	See Palmerston Well #3 Data	4	0.51	31	1.39	Palmerston Well #2 Data
February	19.4	210	2,912		4	0.55	28	1.36	
March	19.2	290	3,126		5	0.48	31	1.35	
April	19.1	226	2,876		4	0.53	30	1.30	
May	20.2	170	2,943		4	0.50	31	1.38	
June	20.4	640	3,919		5	0.46	30	1.41	
July	19.6	1107	18,976		5	0.42	31	1.28	
August	19.2	727	14,515		4	0.42	31	1.27	
September	19.2	659	4,796		5	0.58	30	1.42	
October	19.7	252	3,204		4	0.56	31	1.34	
November	19.8	194	2,955		4	0.47	30	1.38	
December	19.8	151	2,999		5	0.58	31	1.37	
Total			66,286	3,435	53		365		
Average			5,524			0.51		1.35	
Maximum	20.4	1107							

Disinfectant Compound Used: **12% Sodium Hypochlorite**
Form of Residual Displayed: **Free**
Quantity of Disinfectant Used During 2025 for Wells #3 and #4 combined: **3,435 L** ***(Wells #3 and #4 share the same NaOCl storage container)***
Distribution System Minimum Target Residual: **0.2 mg/L**

3.2 Comparison of Actual Flow and Maximum Allowable Rates

O. Reg. 170/03 stipulates that a summary of the quantities and flow rates of the water supplied from each of Palmerston's wells be included in the Summary Report and compared against the rated capacity and flow rate for the system. As such, a comparison of the instantaneous peak flow to the PTTW's rated capacity is included and a comparison of the maximum daily flow to the MDWL's rated capacity is included in Table 3.5 & Table 3.6. Table 3.5 and Table 3.6 reflect the comparisons between the PTTW and MDWL.

Table 3.5
Palmerston Drinking Water System
Well #1 & 2 Combined
Treated Water Flow
January 1, 2025 – December 31, 2025

Month	Treated Water Flow Max Daily Volume – 1,964 m3/day Max Flow Rate = 22.83 L/s Well # 1 22.83 L/s Well # 2				Chlorine
	Operator Observed Peak Flow Well #1 (L/s)	Operator Observed Peak Flow Well #2 (L/s)	Maximum Day Flow (m^3/day)	Monthly Total (m^3)	Monthly Total (L)
January	15.0	17.8	399	11,371	199
February	15.0	17.6	347	10,043	221
March	15.0	17.7	409	11,327	194
April	15.0	17.8	540	10,878	239
May	15.0	17.5	553	11,820	221
June	15.0	17.3	520	14,243	285
July	15.0	17.3	1,304	17,991	377
August	15.0	17.2	810	20,990	416
September	15.1	17.3	769	20,133	366
October	15.1	17.3	699	17,094	372
November	15.1	17.6	357	10,339	196
December	15.1	17.7	497	11,147	240
Total				167,375	3,326
Average				13,948	
Maximum	15.1	17.8	1,304		

Table 3.6
Palmerston Drinking Water System
Well #3 & 4 Combined
Treated Water Flow
January 1, 2025 – December 31, 2025

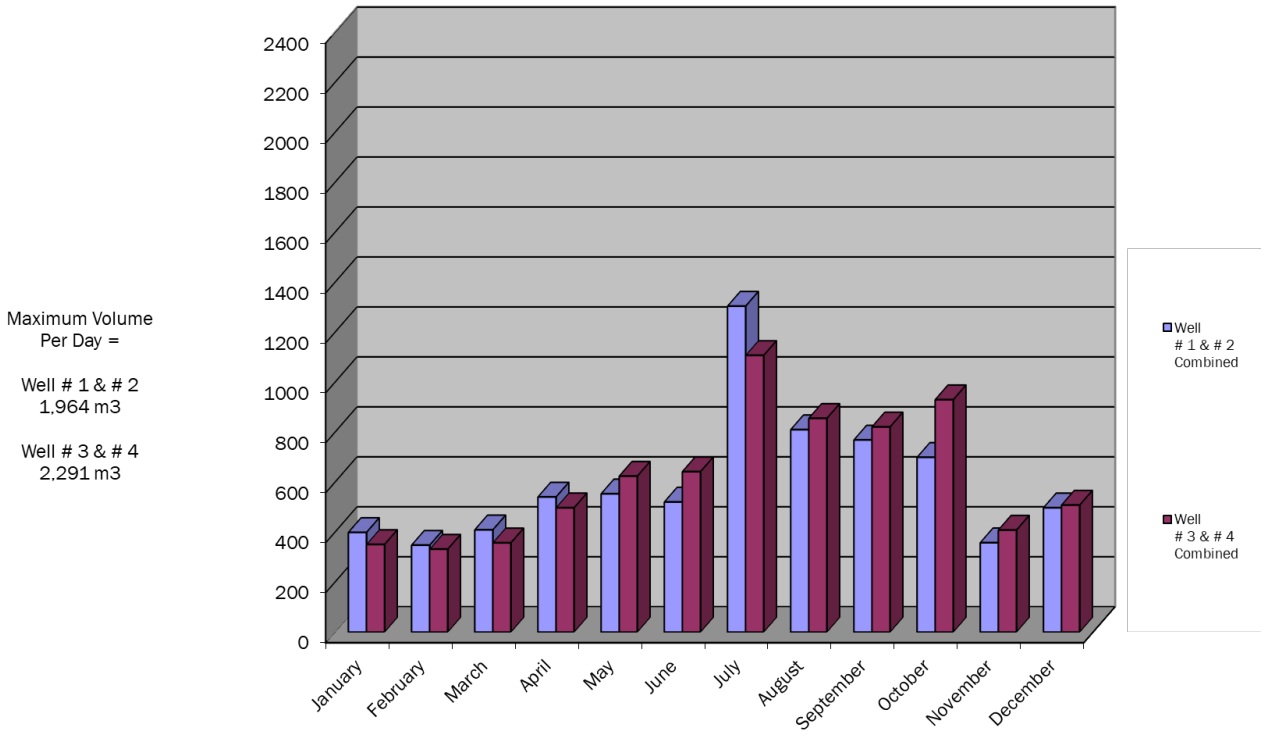
Month	Treated Water Flow Max Daily Volume – 2,291 m3/day Max Flow Rate = 26.7 L/s Well # 3 26.7 L/s Well # 4				Chlorine
	Operator Observed Peak Flow Well #3 (L/s)	Operator Observed Peak Flow Well #4 (L/s)	Maximum Day Flow (m^3/day)	Monthly Total (m^3)	Monthly Total (L)
January	18.2	19.4	350	11,506	220
February	18.4	19.4	331	10,003	220
March	18.2	19.2	357	11,288	195
April	18.2	19.1	497	11,396	236
May	17.9	20.2	624	14,364	310
June	17.8	20.4	642	16,495	334
July	11.1	19.6	1,107	19,286	355
August	12.1	19.2	855	18,285	342
September	18.8	19.2	821	23,785	472
October	19.0	19.7	930	19,833	355
November	18.7	19.8	408	11,523	199
December	18.7	19.8	508	12,085	197
Total				179,849	3,435
Average				14,987	
Maximum	19.0	20.4	1,107		

Table 3.7
Comparison of Flow Rates and Flow Capacities
To
Rated Flow Rate (PTTW) and Rated Capacity (MDWL)

Well Supply	PTTW Max. Flow Rate	Operator Observed Peak Flow	Percent of Maximum Allowable	MDWL Schedule C Maximum Daily Quantity	Maximum Daily Flow	Percent of Maximum Allowable
	L/s	L/s	%	m^3/day	m^3/day	%
Well #1	22.8	15.1	66	1,964	257	13
Well #2	22.8	17.8	67	1,964	1,304	66
Well #3	26.7	19.0	71.2	2,291	930	41
Well #4	26.7	20.4	76	2,291	1,107	48

The MDWL stipulates, "*The maximum daily volume of treated water that flows from the treatment subsystem to the distribution system shall not exceed the value identified as the rated capacity in Schedule C Table 1.*"

Table 3.8
Maximum Water Usage Per Day by Month



Short-term peaks, in excess of permitted values, may occur at pump start up, while doing specific maintenance procedures or during emergency demand situations.
The time and duration of any flow exceedance is recorded for each event along with the reason for the occurrence. There were no extended exceedances or exceedances over the daily permitted rate in the Palmerston Drinking Water System.

3.3 Raw Water Quality and Required Treatment

The Palmerston Drinking Water System has no naturally occurring chemical parameters that exceed MAC (maximum acceptable concentration) or IMAC (interim maximum acceptable concentration). The Palmerston Drinking Water System uses PW1680 to improve water quality.

The William Street Wellhouse (*Well #1 and #2*) and the Whites Road Wellhouse (*Well #3 and #4*) are equipped with continuous monitoring analyzers for measuring free chlorine residual. The chlorine analyzers are equipped with alarms. In the event of an adverse chlorine residual reading, a signal is sent to the SCADA system, which in turn, shuts down the respective well pump. The average monthly turbidity and free chlorine residual measurements for treated water are presented in Tables 3.1, 3.2, 3.3 and 3.4 for Well #1, Well #2, Well # 3 and Well # 4, respectively.

There were no turbidity readings exceeding 1.0 NTU in 2025. The minimum, maximum and average turbidity readings for raw water from each well are presented in Table 3.9.

12% Sodium Hypochlorite is the disinfectant used. Free chlorine residual is monitored continuously at the "*Point of Entry*" (*POE*) into the distribution system. Additional "*grab samples*" are taken daily (*excluding weekends and holidays*) within the distribution system and tested for the free chlorine residual. The minimum, maximum and average values of free chlorine residual at the POE are presented Table 3.9.

The free chlorine residual in the distribution system ranged between 0.57 mg/L and 1.40 mg/L. O. Reg. 170/03, Schedule 1-2 stipulates that the free chlorine residual can never be less than 0.05 mg/L. In addition, O. Reg. 170/03, Schedule 1-4 stipulates that the water treatment equipment must be "*…capable of achieving, at all locations with the distribution system, a free chlorine residual of 0.2 mg/L …*". The Palmerston Drinking Water System meets both of these requirements.

Table 3.9
2025 Arsenic Quarterly Sample Results
for Palmerston Drinking Water System

	Parameter	Sample Date	Result Value	Unit of Measure	MAC
Well # 1	Arsenic	08/05/25	6.2	ug/L	10
	Arsenic	15/08/25	4.5	ug/L	10
	Arsenic	14/11/25	4.1	ug/L	10

Table 3.10
Palmerston Drinking Water System
2025 Annual Summary of
Raw Water Turbidity and Free Chlorine Residual

Location	Range	Raw Water Turbidity	Free Chlorine Residual at POE
		NTU	mg/L
Well #1	Minimum	0.28	1.02
	Maximum	0.81	1.61
	Average	0.48	1.31
Well #2	Minimum	0.14	0.85
	Maximum	0.57	1.74
	Average	0.37	1.29
Well #3	Minimum	0.21	0.89
	Maximum	0.89	1.77
	Average	0.43	1.31
Well #4	Minimum	0.21	0.72
	Maximum	0.69	1.65
	Average	0.42	1.35

3.4 Summary of Treatment Chemicals Used

The disinfectant chemical used in the Palmerston Drinking Water System is 12% Sodium Hypochlorite. Measurements of free chlorine residual are recorded on a continuous basis. In 2025, 6,761 L of 12% Sodium Hypochlorite was used. The average dosage rates are presented in Table 3.10.

In 2025, 1,614 L of PW1680 was used for the sequestering of iron. Wells #1 and #2 share a common tank of PW1680. The average dosage rates are presented in Table 3.10.

Table 3.11
Palmerston Drinking Water System
2025 Annual Summary of
Treatment Chemicals Used

Treatment Chemical	Well	Volume Used	Mass Used	Annual Flow	Dosage Rate
		L	kg	m^3	mg/L
12 % Sodium Hypochlorite (NaClO)	Well #1	662	79.4	30,588	2.60
	Well #2	2,664	319.7	136,787	2.34
	Well #3 & #4	3,435	412.2	179,849	2.29
	Total	**6,761**	**811.3**	**347,224**	**2.34**
PW1680	Well #1 & Well #2	1,027	1,437.8	167,375	8.59
	Well #3 & Well #4	587	821.8	179,849	4.57
	Total	**1,614**	**2,259.6**	**347,224**	**6.51**

Note:
- *Wells #1 and #2 share the same PW1680 storage container; 1,027 L is the combined PW1680 usage for both wells*
  Wells #3 and #4 share the same PW1680 storage container; 587 L is the combined PW1680 usage for both wells
- *12% Sodium Hypochlorite = 120,000 mg/L = 120 kg/m^3*
- *PW1680 has a specific gravity = 1.4*

4.0 COMPLIANCE

4.1 Assessment of Compliance

The objective of the Summary Report is to list any requirements of the Act, the regulations, the PTTW, the MDWL, the DWWP and any MECP Order that the system failed to meet from January 1, 2025 to December 31, 2025, and the corresponding corrective measure(s) taken. Compliance was assessed as follows:

- MECP Completed Inspection of the Palmerston drinking water system was completed June 4, 2025, Final inspection rating score 95.21%
- There was a Regulatory Non-compliance issue noted for Clifford, Harriston, Palmerston and Minto Pines due to a sampling issue where the required samples were collected outside the 120 day window for sample collection of quarterly samples. The samples were collected on March 19th 2025 once the sampling issue had been discovered. The issue was resolved by operator training and calendar reminders for all water staff.

- There were **no MECP Orders** issued to the Palmerston Drinking Water System in 2025.
- The MDWL imposes the specific rules and conditions governing the standards set out in O. Reg. 170/03. It is an important instrument in defining the requirements of compliance of a Drinking Water System.
- O. Reg. 170/03 establishes the standard for protection of drinking water; specifically, through 12 schedules that municipal residential drinking systems must follow to meet the requirements of the regulation.
- The SDWA identifies the responsibilities of owners and operating authorities of municipal drinking water systems. It places a recommended statutory standard of care on those who have oversight of municipal drinking-water systems. In essence, the standard of care has two themes: be informed and exercise diligent oversight.
- Adverse Test Results reported under the Safe Drinking Water Act, 18(1) or O Reg.170/03, Schedule 16-4
  a) Adverse Water Quality Incidents (AWQI) refer to any unusual test results that do not meet provincial water quality standard or situation where the disinfection of the drinking water may be compromised.

Table 4.1
Adverse Water Quality Incidents

AWQI #	Date	Parameter	Result	Corrective Action

4.2 Summary of Compliance

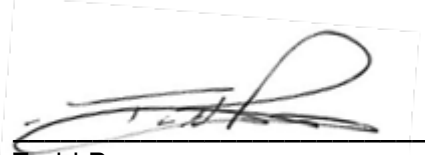
The Town of Minto works diligently to maintain compliance, with all of the requirements of the SDWA, O. Reg. 170/03, as well as the Palmerston Water Work's MDWL 106-103 Issue 4, DWWP 106-203 Issue 4, and PTTW #8341-BZLRR9.

Table 4.2 identifies any non-compliance related to the following: SDWA, O. Reg. 170/03, the MDWL, the DWWP and the PTTW.

Table 4.2
Palmerston Drinking Water System
Requirements the System Failed to Meet

Compliance With	Description of Item the System Failed to Meet	Correction of This Situation How/When
MDWL # 106-103 Issue 4	*Palmerston Drinking Water System is in compliance with all of the requirements of the MDWL.*	
DWWP # 106-203 Issue 4	*Palmerston Drinking Water System is in compliance with all of the requirements of the DWWP.*	
O. Reg. 170/03	*Palmerston Drinking Water System was in non-compliance with the 1st Quarter Sampling requirements, the issue was resolved with no further action required per MECP. The Palmerston DWS is in compliance with all other requirements of O. Reg. 170/03.*	
SDWA	*Palmerston Drinking Water System is in compliance with all of the requirements of the SDWA.*	
PTTW #8341-BZLRR9	*Palmerston Drinking Water System is in compliance with all of the requirements of the PTTW.*	

Dated this 5th day or March 2026



Todd Rogers
Water Services Manager