

# CITY OF ST. CHARLES, MISSOURI

## Elm Point Wellfield Updates

January 2023



### **FOR MORE INFORMATION**

If you would like to know more about the contamination threatening the Elm Point Wellfield, contact:

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**[www.stcharlescitymo.gov](http://www.stcharlescitymo.gov)**

The Elm Point Wellfield serves as the primary source of drinking water to the City of St. Charles and is located in the area of Huster Road extending from Elm Point Road north past Missouri State Route 370. The City maintains a network of seven drinking water wells capable of producing nearly nine millions gallons of water per day. The City of St. Charles drinking water wells have been contaminated by releases of chemicals from three facilities located within the Elm Point Wellfield. In order to ensure that drinking water is still safe for residents, the City has been forced to shutdown operation of five of the drinking water wells. Three of the wells were shut down in the past year. Most recently the City was forced to shut down drinking well CW-9 in December.

### **Safeguarding the City's Future Water Supply**

The two operating drinking water wells are not sufficient to supply water for the 70,000 residents in the City of St. Charles on an average day. During an average day, six million gallons of water are used by the City's residents and businesses. The two remaining wells can only produce up to one and a half million gallons each day. Because of this, the City is purchasing additional water from the City of St.



Louis. This is an expensive solution and relies heavily on processes that are outside of the City of St. Charles's control.

Since the water supply is our top concern, the City's most important project is relocating the wellfield to an area free of contamination both now and in the future. The City has contracted with a firm to design a new well field outside the area of contamination. The new drinking water wells will supply the City with sufficient water to meet the daily capacity that was lost when the City was forced to shut down the exiting wells.

Each of these new wells is designed to produce between one and two million gallons per day, and allows for rotating the use of wells for maintenance and recharging of the aquifer. The City is early in the design process and the locations for the new wells are being investigated for water production and quality. In order to make this happen, the City will start by working with property owners to gain access to do pump testing and will ultimately lead to the purchase of needed property rights for new wells.

After testing and obtaining property rights, the replacement wells will be designed and the City will hire contractors to install the wells and necessary pipes to connect the new wells to the existing water treatment plant on Elm Point Road or to install a new water treatment system. Each new well will require a hole that is approximately a hundred feet deep and three feet in diameter. A new well house will be installed on top of the hole, which will house the necessary equipment and pumps. The new wells be designed to ensure clean and safe drinking water for decades to come.

## City of St. Charles' Plans and Actions in the Wellfield

In November, the City submitted a notice to the United States Environmental Protection Agency (USEPA) and Missouri Department of Natural Resources (MoDNR) requesting the development of a comprehensive plan for the safe restart of drinking water wells CW-4, CW-5, CW-6, and CW-8 before the end of the year. This request was made prior to the identification of contamination and suspension of pumping in drinking water well CW-9. The City was specifically requesting assistance for additional treatment of water from the USEPA and Missouri DNR to ensure the safety of the drinking water delivered to the citizens of the City of St. Charles. In separate responses submitted to the City in early December, the USEPA and MoDNR proposed that following the restart of any of the shutdown drinking water wells in the Elm Point Wellfield, additional monitoring would be conducted within the wells and the City's Elm Point Water Treatment Plant by Ameren, MoDNR, and others. MoDNR stated that it is the responsibility of the City, not Ameren or the other polluters, to ensure that safe drinking water is delivered to the City's citizens and the City would be placed on a compliance monitoring plan if contaminants were detected in the water entering the Elm Point Treatment Plant. The USEPA and MoDNR have both stated that an exceedance of the Maximum Contaminant Level (the concentration considered safe by the USEPA) within the treated water that is being consumed by the City's citizens is based on "an average of four quarters of data." This would imply that the City's citizens would be allowed to consume water at unsafe levels for a year before any further action is taken by the MoDNR or the USEPA. The City has found these recommendations to be woefully inadequate, the enforcement actions proposed by MoDNR to be levied against the City for operating the drinking water wells that have been contaminated by Ameren and others to be unacceptable, and the proposal for the citizens of the City to drink contaminated water for any period of time before any action is taken by the regulatory agencies charged with protecting their health to be preposterous.

On December 5, the USEPA decided to postpone the limited subsurface investigation of the contaminants detected near and within drinking water well CW-6. Contrary to what you may have heard, the City has not denied access to the City-owned property for the USEPA to conduct the investigation. The City provided the USEPA and their contractor performing the investigation with a standard access agreement on December 2, 2022, which protects the City from any accidental damage that may result from the work performed by the contractor. This is a requirement of any business doing work on City property. The access agreement was submitted within three days of notification from the USEPA of their intent to begin the limited investigation. The limited subsurface investigation is now scheduled to be conducted by the USEPA between January 16 and February 3, 2023. This investigation will include the collection six soil samples at three locations and as many as 50 groundwater samples from 16 locations. The majority of the investigation activities will be performed near City drinking water well CW-6 using a one-time, direct-push sampling technique. The City of St. Charles strongly objects to the use of direct-push technology as a part of this investigation near City well CW-6. Therefore, the City has elected to conduct its own independent investigation. The City's investigation will include the installation of 26 permanent monitoring wells at 13 locations. Groundwater samples can be repeatedly sampled from these new wells to better define the extent of contamination emanating from the Ameren Huster Road Substation and provide an early warning of migration of hazardous chemicals towards the City's drinking water wells. The City's independent investigation will begin in late January 2023.

## Protecting the Elm Point Wellfield

In order to address the recent contamination by Ameren Missouri and others in the Elm Point Wellfield, the City of St. Charles has requested immediate action be taken by the USEPA including:

1. The USEPA should require Ameren Missouri and other responsible parties to immediately design and install upgrades to the City's drinking water treatment plant to remove the hazardous chemicals to ensure continued safety of the public drinking water
2. The USEPA should require Ameren and other responsible parties to relocate the City drinking water wells to an area free of contamination
3. The USEPA should reject the current Consent Decree and amend the Record of Decision to reflect the current contamination in the Elm Point Wellfield and require Ameren Missouri to conduct additional investigation activities with an expanded, permanent monitoring network that are currently planned to be performed by the City.

In response to the overwhelming attendance at the November 17, 2022 public meeting hosted by the USEPA and the many comments submitted by the citizens of St. Charles, the USEPA has extended the comment period for the Consent Decree for the Ameren Huster Road Substation until **March 6, 2023**. The USEPA has also pledged to hold an additional public meeting to hear your concerns regarding the contamination in the Elm Point Wellfield. The City continues to urge you to submit your comments and concerns regarding contamination in the Elm Point Wellfield by email to [pubcomment-ees.enrd@usdoj.gov](mailto:pubcomment-ees.enrd@usdoj.gov) or by mail to Assistant Attorney General at U.S. DOJ-ENRD, P.O. Box 7611, Washington, DC 20044-7611 before the close of the public comment period on **March 6, 2023**.