
CITY OF ST. CHARLES, MISSOURI

Elm Point Wellfield

October 2022



FOR MORE INFORMATION

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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 six millions gallons of water per day.

The City of St. Charles drinking water wells have been threatened 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 four of the drinking water wells:

- Well CW-4 was shutdown in 2005
- Well CW-5 was shutdown in 2011
- Well CW-6 was shutdown in 2022
- Well CW-8 was shutdown in 2022

Shutting down these four wells has reduced the ability of the City of St. Charles to meet current demands for drinking water and the City has been required to purchase additional drinking water from the City of St. Louis.

Groundwater Contamination in the Elm Point Wellfield

There are three facilities that have been identified as responsible parties for the contamination within the Elm Point Wellfield. The three facilities are owned by the former Findett Service Company, Cadmus Corporation, and Ameren Missouri.

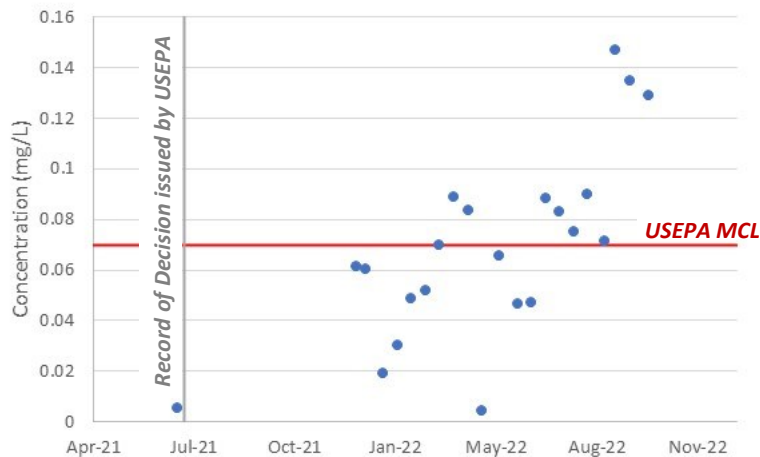
Hazardous chemicals released from these properties have migrated towards the City of St. Charles drinking water wells despite the responsible parties performing cleanup activities. Although the drinking water is currently safe, the cost of purchasing additional drinking water to meet current demand creates a burden to the City of St. Charles. In addition, the cost of relocating the Elm Point Wellfield to an area free of contamination is estimated to cost in excess of \$40 million.

In November 2021, routine monitoring identified that a hazardous chemical called cis-1,2-dichloroethene was detected in City wells CW-6 and CW-8. The concentration measured in these two drinking water wells was below the maximum contaminant level (MCL), which is the limit used by the United States Environmental Protection Agency (USEPA) to determine if water is safe to drink. Then in December 2021, groundwater samples collected by Ameren Missouri from a monitoring well located approximately 100 feet from well CW-6 contained concentration of cis-1,2-dichloroethene and another hazardous chemical, vinyl chloride, at concentrations above the MCLs. Ameren Missouri has since been conducting sampling twice each month within City well CW-6 and the nearby monitoring well. The results of this sampling indicate that the concentration of cis-1,2-dichloroethene and vinyl chloride has been increasing over time.

The graph to the right shows the increasing concentration of cis-1,2-dichloroethene in ground-water near well CW-6 since 2021. The red line represents the USEPA MCL for cis-1,2-dichloroethene.

In September 2022, independent samples collected by the City of St. Charles indicated that the concentration of vinyl chloride exceeded the MCL in drinking water well CW-6. Samples collected by Ameren Missouri in October 2022 confirmed the City's findings.

Production wells CW-6 and CW-8 remain shutdown and no solutions have been offered by the USEPA, Missouri DNR, or the responsible parties.



Protecting the Elm Point Wellfield

On October 4, 2022, a Consent Decree between the USEPA and Ameren Missouri was submitted for public comment. The Consent Decree provides the legal basis defining Ameren Missouri's responsibilities for cleaning up its portion of contamination in the Elm Point Wellfield. The Consent Decree is largely based on information and data generated as part of the June 2021 *Record of Decision* issued by the USEPA. As shown on the graph, this document and the data used to generate it predates the recent contamination measured in the City drinking water wells.

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, require Ameren Missouri to conduct additional investigation activities with an expanded, permanent monitoring network, and require Ameren Missouri to conduct additional cleanup beneath the Ameren Substation.

Voice your concerns regarding the threats to the Elm Point Wellfield to the USEPA by attending their public meeting on November 17 at 6PM at Memorial Hall – Blanchette Park. Only by being actively engaged in this process can you help to ensure that USEPA takes the necessary actions to ensure that the contamination in the Elm Point Wellfield is cleaned up by Ameren Missouri and the other responsible parties.

The City also urges you to submit official comments regarding the Consent Decree by email to 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 **December 5, 2022**. An example comment letter is available on the City of St. Charles home page at <https://www.stcharlescitemo.gov> Federal law requires EPA to consider and respond to all comments it receives from the public before it can finalize a consent decree. As a result, it is important to get your comments on the record.