

EPA statement to media

December 6, 2022

The EPA is committed to investigating recent detections of 1,2 dichloroethylene (DCE) and vinyl chloride (VC) in the Elm Point Wellfield to ensure that there are no current or future threats to human health or the environment. To date, St. Charles residents continue to drink water that meets all federal and state drinking water requirements.

The Safe Drinking Water Act provides that the maximum contaminant levels (MCLs) for DCE and VC are based on long-term exposure. The Missouri Department of Natural Resources, who implements the SDWA for the State of Missouri, bases MCL drinking water violations at the tap on a running annual average of four quarters of sampling data. Based on information the City has provided to EPA, the City chose to shut off City Well 9, a production well, based on a single uncollaborated, estimated data point significantly below the MCL (at the wellhead, not at the tap). Based on EPA's data, none of the production wells shut down by the City are in violation of the Safe Drinking Water Act.

To investigate the City's concerns, EPA has repeatedly requested that the City of St. Charles provide EPA access to the site in order to conduct sampling, which is necessary to determine the source of contaminant concentrations in PZ-11, a monitoring well in the Wellfield. On October 13, 2022, the Agency notified the City of its intent to perform important characterization field work at the Site in late November/early December and that access to City property was critical in being able to perform the work in a timely manner. The EPA was prepared to mobilize its contractors to perform this work beginning Monday, December 5, 2022. However late on Friday afternoon, December 2, the City informed EPA of additional requirements needed before the City would allow access. These agreements are extensive and required legal review, which could not have been accomplished in the time between receiving the notification and the long-planned start of work.

Accordingly, without access granted by the City, the EPA was required to cancel the planned sampling event. The EPA is prepared to conduct additional sampling this winter if EPA obtains the City's consent to access. The sampling is required to determine the next steps needed to address any contaminants in and around the City wells. Given the most recent delay caused by the lack of access, the earliest that EPA anticipates initiating field work would be in January, if the contractor and drilling equipment are available. If they are not available, an additional delay would be likely.

The work EPA had planned to start on December 5 was to evaluate the source of volatile organic compound (VOC) contamination that was unexpectedly found in PZ-11, a

monitoring well near City Well 6, in December 2021. Ameren had planned to start this evaluation in April 2022, but due to access issues, EPA eventually took over the work in October. The source for this contamination has not been confirmed to be from the Ameren substation, where previous cleanup measures and routine sampling had shown the contaminated groundwater plume had been shrunk back to within the boundaries of the substation.

It is critical that EPA perform characterization sampling on City-owned property around City Well 6 to determine if the source of the contamination is from the Ameren substation or if there is another unknown source that is responsible for these new concentration levels. Once this determination has been made, EPA can either require Ameren to perform additional cleanup actions if the contamination is determined to be from the substation, or EPA will attempt to identify who is responsible for the contamination if it is not from the Ameren substation.

Once EPA is able to obtain site access from the City and reschedule the work with EPA's contractor, it will take approximately two weeks to conduct the field work and EPA will be able to share the data with the public after it is analyzed by the lab and shared with the property owners.

EPA does not have any data collected from Ameren on PZ-11, the nearby monitoring well, since November 17, 2022, or from City Well 6 since October 28, 2022. Ameren had been conducting biweekly sampling of City Well 6 and PZ-11 since December 2021. However, on November 17, 2022, the City stopped providing Ameren access to perform sampling.