



Amber Steele  
Missouri Department of Natural Resources  
Geological Survey Program  
P.O. Box 250  
Rolla, MO 65402

September 11, 2018

Re: Proposed change to Missouri Rule CSR 10-23.3

Dear Ms. Steele:

The Environmental Task Force of Jasper and Newton Counties (ETF) has reviewed the proposed revisions to Missouri Rule CSR 10-23.3 that would allow private drinking water wells to be drilled into the shallow water aquifer in areas of Jasper and Newton Counties. These areas have been known to have contamination of the shallow water aquifer with levels of lead and cadmium in excess of EPA drinking water standards of 15 ppb and 5ppb respectively.

The prohibition of shallow drinking water wells was put in place in 1998 as part of the Record of Decision for Ground Water Operable Unit 4 as a protection from future exposure of Jasper and Newton county area residents to these excessive levels of lead and cadmium contamination that are a risk to the health of these residents. The initial rules were developed by the Missouri Well Installation Board after conducting numerous public hearings in the area to receive input from local residents. The ETF participated in these hearings as well and was supportive of the proposed rules. The state of Missouri supported these requirements at the time of implementation.

The EPA, as part of the remediation activities in Jasper and Newton Counties has already spent approximately \$7.7 million to address previous issues associated with private well contamination by extending public waters systems into areas where wells were found to be contaminated. The state of Missouri as part of its participation in theses cleanup activities has invested 10% of the cost toward these actions.

The ETF is opposed to the proposed rule changes as it will increase risk to public health of residents as well as potentially cause the need for additional costly remediation activities in the future as newly drilled wells into the shallow aquifer are found to be

contaminated. Further, the ETF is concerned that as well testing will not be required, residents may unknowingly be exposed to harmful levels of lead and cadmium.

If you have any questions, don't hesitate to contact me at (417) 389-2030.

Sincerely,

John Harrington, Chairperson  
Environmental Task Force of Jasper and Newton Counties