Safe Drinking Water Act Enforcement: Missouri Department of Natural Resources and Saint Genevieve Noncommunity Public Water System Enter into Administrative Order on Consent



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The Missouri Department of Natural Resources ("MDNR") and Charleville, LLC ("Charleville") entered into a July 14th Administrative Order on Consent ("AOC") addressing alleged violations of the Missouri Safe Drinking Water Act regulations. See Oder No. PDWB-2025-316.

The AOC provides that Charleville owns a transient noncommunity public water system in Saint Genevieve, Missouri.

The water system is stated to be a supplier of water and includes one service connection through a distribution system to an estimated 50 people. The system is stated to also consist of:

- One groundwater well.
- One ion-exchange treatment system.
- One pressure tank.
- One distribution system.

The MDNR is stated to have mailed Charleville a letter following receipt of a of a Public Water System Survey submitted January 12, 2023, stating that the system meets the definition of a public water system.

MDNR conducted a compliance assistance visit to on February 22, 2023, to discuss general regulatory requirements and to obtain information about the infrastructure and management of the system.

MDNR is stated to have classified the system's well as noncompliant on July 17, 2023.

A September 7, 2023, report MDNR mailed to Charleville, pursuant to an August 16, 2023, inspection, identified three unsatisfactory findings:

- Operating without a permit to dispense.
- Failure to have a bacteriological site sampling plan.
- Failure to maintain required records.

MDNR subsequently acknowledged the correction of two of the three unsatisfactory findings.

MDNR mailed a March 12, 2024, Notice of Violation to Charleville for failing to submit one routine sample for nitrate analysis for the calendar year 2023 monitoring period. The system subsequently submitted the required sample for the calendar year 2024 monitoring period.

Charleville submitted a Level 1 Assessment on June 20, 2024, following multiple total coliform positive samples collected for the June 2024 monitoring period. The assessment is stated to have been attributed to unsafe samples to recent replacement of several check valves and sampler inexperience.

An MDNR Level 2 Assessment on August 15, 2024, is stated to have identified three sanitary defects. The system was directed to replace the clear PEX tubing with colored PEX tubing to inhibit algae growth, shock chlorinate and flush the distribution system and have their water softener contractor examine the softening equipment. Documentation of the corrected sanitary defects were subsequently provided.

MDNR sent a Notice of Violation on April 4, 2025, alleging that a well that does not meet minimum construction standards. The system is stated to not have a permit to dispense water to the public. A PTD application will only be considered after the system completes the requirements provided in the Corrective Actions Section of the AOC.

The AOC provides that neither the payment or any money nor the execution of this Order by the parties will constitute or be construed as an admission of any wrongdoing or liability whatsoever by any party.

The AOC provides for a series of corrective actions that must be undertaken pursuant to specified time periods. Stipulated penalties are provided in the event of noncompliance with the corrective actions.

A copy of the AOC can be downloaded here.