From:	Miller, Barbara J
To:	Howell, Tonya; feyi.ilesanmi@dnr.mo.gov; Brown, Randolph; Sperry, Clint
Subject:	Work Plan for PZ-11 and area around CW-6 - Huster Substation OU4
Date:	Sunday, November 06, 2022 4:17:24 PM
Attachments:	PZ-11 Work Plan - 2022.pdf
Importance:	High

Dear Tonya Howell and Huster OU4 team:

Attached for your review and approval is Ameren's draft Pilot Test Work Plan that we have been discussing with you in connection with Remedial Action at or near PZ-11. The purpose of the work described in the Plan is to maintain levels of protection for the Elm Point Well Field and to allow the continued use of all operable municipal water supply wells by decreasing or eliminating concentrations of the DCE and Vinyl Chloride recently detected at PZ-11 from an unknown source. In light of data trends and patterns, it seems unlikely that the Ameren Substation is the source of those recent detections, but we nevertheless are happy to put such determinations on the back burner while providing our expertise and resources to address the concern as soon as possible.

This work already has been proven remarkably effective within OU4 for the purpose of eliminating any potential threats to the municipal water supply. As you will recall, this same Pilot Test procedure was used successfully in connection with Municipal Well 5 a few years ago, when it quickly controlled groundwater conditions at that location and prevented any further groundwater quality issues at Municipal Well 5. In fact, US EPA's prior approval of this process in that context was one of the key factors that facilitated Ameren's ability to eliminate the groundwater plume associated with the Huster Road substation much more quickly and effectively than other approaches that were being considered at the time.

Of course, this work will complement and coordinate with US EPA's upcoming efforts to investigate the source of the chemical detections in and near PZ-11, as we view that investigation to be a critical path forward for determining next steps and addressing public questions. Regardless of the source, however, this approach is a proven and effective way to neutralize the chemicals as soon as possible, and Ameren sees no reason to wait to achieve that result. Assuming

that this approach once again meets with your approval, we look forward to implementing the work as soon as the weeks of November 14 and/or 21 in order to address emerging public questions about aquifer conditions as soon as possible.

Sincerely,

Barbara J Miller

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