

OPERABLE UNIT 4 BACKGROUND

The Findett Corp. site is divided into four different parts, called Operable Units (OUs).

OU4 addresses soil and groundwater contaminated by chemicals called volatile organic compounds at and around Ameren Missouri's Huster Road Substation.

Contamination was first detected at City Well 5 (CW-5), located about 200 feet north of the substation, in summer 2010. The OU3 group of potentially responsible parties (PRPs) began investigating around the substation in 2011. OU4 was identified as a separate and distinct source of contamination contributing significantly to the contamination in the Elm Point Wellfield.

PILOT STUDY OVERVIEW

In 2025, Ameren submitted a proposal to EPA to conduct a pilot study at the Huster Road Substation. This pilot study would try a different method than previously used to inject a chemical called sodium permanganate into source area soils that would only be accessible during a

scheduled transformer replacement. After receiving EPA's approval, Ameren began excavation for the project in March 2026.

To treat the remaining source contamination in the soils, Ameren is conducting in-situ chemical oxidation (ISCO). ISCO is a cleanup method where sodium permanganate is injected into the ground to break down contamination in soil or groundwater into less harmful substances.

A total of 79 injection wells are planned to be installed in the soil as part of the pilot study. After installation, injections of sodium permanganate will take place over the course of 4 to 6 months.

What's Important

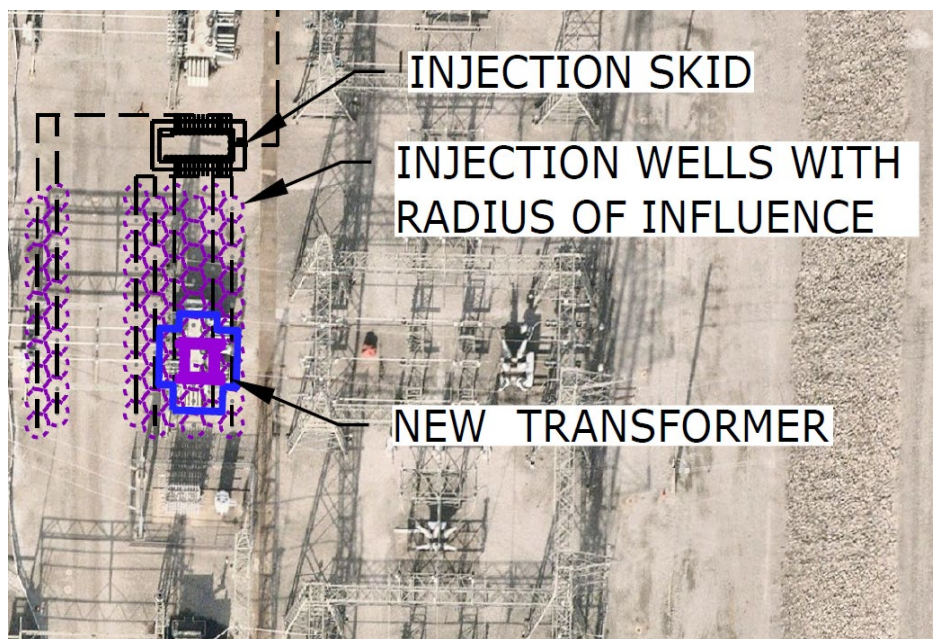
- ❖ Ameren is conducting a soil source treatment pilot study at the Huster Road Substation (OU4).
- ❖ The goals of the pilot study are to address previously inaccessible source area soil contamination during replacement of a transformer and determine if the application method is successful at treating the soil.
- ❖ A treatment using a chemical called sodium permanganate will be pushed into the contaminated soils through 79 planned injection wells.
- ❖ The treatment is designed so that sodium permanganate stays in the contaminated soils. However, there are several safeguards in place to protect the drinking water supply if permanganate reaches groundwater.
- ❖ EPA has approved the plans associated with this work and will continue to conduct oversight throughout the pilot study.



*This OU4 outline represents the location of the Huster Road Substation and is not reflective of offsite contamination

The injection wells will be split into three groups, with an injection duration of approximately 60 days for each group of wells.

The injection locations will be staggered across the treatment area (not next to one another), when possible. Approximately 5.6 gallons of permanganate will be injected into each well per day. Injections into each well will occur for up to 60 continuous days or until the target of 330 gallons is injected into that well. The treatment period began on May 7, 2026, and injections are scheduled to continue until November 2026.



Huster Substation Pilot Study Low Flow/Pressure Injection Soils Application Work Plan, Figure 7. Injection well locations.

The injection period will be followed by approximately 6 to 12 months of the sodium permanganate spreading where, if successful, it is anticipated that the permanganate will continue to treat the contaminated soil. The treatment is not designed to reach groundwater beneath the contaminated soil. However, Ameren will conduct routine monitoring and sampling during this time to limit any potential escape of sodium permanganate from the treatment area and into the surrounding groundwater.

CONTINGENCY MEASURES

There are several layers of protection in place, such as the previously installed barrier walls, to minimize any adverse impacts to the Elm Point Wellfield from the use of sodium permanganate during treatment applications. There are also proactive measures such as increased monitoring and observation, as described in the approved work plan (link below). Additionally, there are certain sampling and observation measures that, if met, mean the permanganate injections will be suspended, EPA will be notified, and an investigation will be conducted to determine if any additional actions need to be taken and whether injections can resume.

Additional notifications to EPA will occur within 24 hours if certain contingencies are triggered. Observation logs maintained by Ameren will be provided to EPA on at least a weekly basis. EPA will continue to communicate with the city of St. Charles throughout the duration of the pilot study and provide information and data that could potentially impact wellfield operations to the city as soon as possible.

SITE RESOURCES

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EPA Site Profile page
www.epa.gov/superfund/findettcorp

Huster Substation Pilot Study
Low Flow/Pressure Injection
Soils Application Work Plan

