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TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

November 6, 2006

Mr. Ted Fasting
Director, Environmental Health & Safety
Cooper Cameron Corporation
1333 West Loop South, Suite 1700
Houston, TX 77027

Re: Comments to 2006 Annual Groundwater Monitoring Report and Field Activities Summary, dated October 10, 2006, Cameron Iron Works - Katy Road Facility, 1000 Silber Road, Houston, Harris County, TX; Voluntary Cleanup Program (VCP) No. 221, RN101474880, CN600374821

Dear Mr. Fasting:

The VCP of the Texas Commission on Environmental Quality (TCEQ) has reviewed the above referenced submittal. Based on the requirements of the October 25, 2004 and December 30, 2004 TCEQ letters concerning the method that will be used to determine when more frequent monitoring or remedial response actions will be required, the TCEQ has the following comments:

- Sample Results for MW-70:** The concentrations of 1,1-dichloroethane and cis-1,2-dichloroethene in the groundwater sample collected from monitoring well MW-70 on April 25, 2006, were greater than the method quantitation limits (MQLs), but below the Protective Concentration Levels (PCLs), which requires the well to remain on a quarterly monitoring schedule. The TCEQ agrees with the remedial response action of continued quarterly monitoring of MW-70. The TCEQ reserves the right to require a more aggressive response action in the future, if concentrations are above the critical PCL or show an increase.
- Sample Results for MW-93 and MW-125:** The concentrations of tetrachloroethene (PCE) detected in the groundwater samples collected from monitoring wells MW-93 and MW-125 on April 26, 2006, were greater than the critical PCL. A remedial response action (injection of potassium permanganate) was conducted in September 2005 at injection wells in the area of MW-93. The TCEQ agrees with the continued remedial response action of quarterly monitoring of MW-93 and MW-125, and the monthly evaluation of the presence of potassium permanganate in the injection wells to determine if additional injection will be required. In the event that the monthly evaluation indicates no evidence of potassium permanganate, a more aggressive response action (potassium permanganate injection) will be required to reduce the PCE concentrations in the area of monitoring well MW-93.

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3. **Surface Water Sampling Results:** The TCEQ notes that the concentrations of all constituents in the surface water samples collected from the six Harris County Flood Control District Ditch (HCFD) surface water sampling points during the April 24, 2006 sampling event, are reported as 'Not Detected' above the MQL or had estimated concentrations (J Flagged) less than 80% of the critical PCLs. The TCEQ agrees with the continued collection of surface water samples semiannually from the six HCFD sampling locations.

Please submit future groundwater monitoring results to my attention at the TCEQ at the letterhead address using mail code MC-221. Should you need additional information or wish to discuss these comments, please call me at (512) 239-3044.

Sincerely,



Mark R. Riggle, P.G., Project Manager
Team 3, Environmental Cleanup Section II
Remediation Division
Texas Commission on Environmental Quality

MRR/cr/ts

cc: Mr. Frank M.K. Liu, President, Silber Pads, Ltd., Houston, TX
Mr. Gregory J. Wheeler, P.G., Environmental Resources Management, Houston, TX
Mr. Brian T. Weaver, P.G., SKA Consulting, L.P., Houston, TX