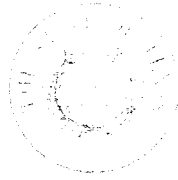


Kathleen Hartnett White, *Chairman*
Larry R. Soward, *Commissioner*
Glenn Shankle, *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

August 31, 2006

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

Re: Comments to *Third Quarter 2006 Monitoring Data Transmittal* dated August 18, 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:

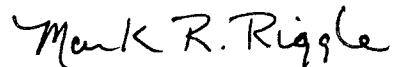
1. **Sample Results for MW-70:** The concentrations of 1,1-dichloroethane and cis-1,2-dichloroethene in the groundwater sample collected from monitoring well MW-70 on July 18, 2006, were greater than the method quantitation limits (MQLs), but below the Protective Concentration Levels (PCLs), which requires the well to remain on a quarterly monitoring schedule. The concentrations of trichloroethene and 1,1-dichloroethene were estimated (J-flagged) to be less than the MQL and the PCL. The TCEQ agrees with the remedial response action of continued quarterly monitoring of MW-70 during the next two sampling events scheduled for October 2006 and January 2007. 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.
2. **Sample Results for MW-93:** The concentration of tetrachloroethene detected in the groundwater sample collected from monitoring well MW-93 on July 18, 2006, was greater than the critical PCL. A remedial response action (injection of potassium permanganate) is proposed prior to the Second Half 2006 monitoring event scheduled for October 2006 at injection wells in the area of MW-93 to address this tetrachloroethene concentration. The TCEQ agrees with the injection of potassium permanganate as an active response action and the continued quarterly monitoring of MW-93 for tetrachloroethene.

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3. **Sample Results for MW-125:** The concentration of tetrachloroethene detected in the groundwater sample collected from monitoring well MW-125 on July 18, 2006 was 0.005 mg/L. This concentration equals but does not exceed the critical PCL for tetrachloroethene. The reported concentrations at MW-125 have decreased from October 2005 to July 2006. The TCEQ agrees with the continued quarterly monitoring of MW-125 during the next two sampling events scheduled for October 2006 and January 2007. If no tetrachloroethene is detected during these two sampling events, monitoring well MW-125 will return to the semi-annual sampling schedule.

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