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TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

July 12, 2006

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

Re: Comments to *First Half 2006 Monitoring Data Transmittal* dated June 21, 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:

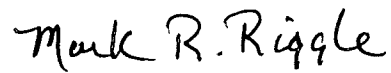
The VCP of the Texas Commission on Environmental Quality (TCEQ) has reviewed the above referenced submittal. Based on the requirements of the October 25, 2004 and December 30, 2004 TCEQ letters concerning the method that will be used to determine when more frequent monitoring or remedial response actions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

1. **Sample Results for MW-70:** The concentration of 1,1-dichloroethane in the groundwater sample collected from monitoring well MW-70 on April 25, 2006, was greater than the method quantitation limit (MQL), but below the Protective Concentration Level (PCL), which requires the well to remain on a quarterly monitoring schedule. The concentration of trichloroethene was estimated (J-flagged) to be less than the MQL and the PCL. The TCEQ agrees with the remedial response action of quarterly monitoring for MW-70 during July 2006. 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 and MW-125:** Concentrations of tetrachloroethene detected in the groundwater samples collected from monitoring well MW-93 and MW-125 on April 26, 2006, were greater than the critical PCL. A remedial response action (injection of potassium permanganate) was completed at injection wells in the area of MW-93 on September 21, 2005. The TCEQ agrees with the continued remedial response action of quarterly monitoring of MW-93 and MW-125 in July 2006 and evaluation of the presence of potassium permanganate in the injection wells to determine if additional injection will be required. The TCEQ reserves the right to require a more aggressive response action in the future, if concentrations are above the critical PCL or continue to show an increase.

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Please submit the July quarterly sampling 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. Gregory J. Wheeler, P.G., Environmental Resources Management, Houston, TX