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## TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

*Protecting Texas by Reducing and Preventing Pollution*

March 10, 2006

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

Re: Comments to *First Quarter 2006 Monitoring Data Transmittal* dated February 28, 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:** Concentrations of 1,1-dichloroethane (1,1-DCA) and cis 1,2-dichloroethene (cis-1,2-DCE) in the groundwater sample collected from monitoring well MW-70 on January 17, 2006, were greater than their respective method quantitation limits (MQLs), but below their respective Protective Concentration Levels (PCLs), which requires the well to remain on a quarterly monitoring schedule. The concentrations of 1,1-dichloroethene (1,1-DCE) and trichloroethene were 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 in April 2006 and 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-81:** Concentrations of all constituents in the groundwater samples collected from monitoring well MW-81 on November 22, 2005 and January 17, 2006 were reported as "Not Detected" above the MQLs. Therefore, monitoring well MW-81 should return to the semi-annual sampling schedule.
3. **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 January 17, 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

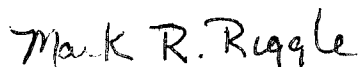
Mr. Ted Fasting  
Page 2  
March 10, 2006

September 21, 2005. The TCEQ agrees with the continued remedial response action of quarterly monitoring of MW-93 and MW-125 in April 2006 and 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.

43. **Sample Results for SWD-14:** The concentration of all constituents in the surface water sample collected from surface water sampling point SWD-14 on January 17, 2006 were reported as "Not Detected" above the MQL with the exception of 1,1-DCE, which had a reported concentration above the MQL and 1,1-DCA, which had an estimated (J Flagged) concentration below the MQL. These concentrations are less than 80% of the critical PCL; therefore, the collection of surface water samples from SWD-14 should return to the semi-annual sampling schedule.

Please submit the April semi-annual 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 non Environmental Quality

MRR/cr/ts

cc: Mr. Gregory J. Wheeler, P.G., Environmental Resources Management, Houston, TX