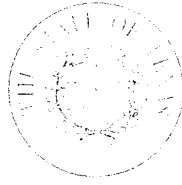


Kathleen Hartnett White, *Chairman*  
R. B. "Ralph" Marquez, *Commissioner*  
Larry R. Soward, *Commissioner*  
Glenn Shankle, *Executive Director*



## TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

*Protecting Texas by Reducing and Preventing Pollution*

January 13, 2006

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

Re: Comments to *Second Half 2005 Monitoring Data Transmittal* dated December 30, 2005, 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 October 26, 2005, 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 January 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 1,1-DCE and vinyl chloride in the groundwater sample collected from monitoring well MW-81 on October 26, 2005, were greater than their respective MQLs and PCLs. A confirmation sample was collected on November 22, 2005 with no concentrations detected above laboratory detection limit. Therefore, the exceedence was not confirmed and a response action in the MW-81 area is not required. Also, 1,1-DCA and cis-1,2-DCE concentrations were greater than their respective MQLs, but below their respective PCLs. The TCEQ agrees with the remedial response action of quarterly monitoring for MW-81 in January 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.

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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 in September, October and November 2005, 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 for MW-93 and MW-125 in January 2006, and monthly monitoring for potassium permanganate in the injection wells (IW-47 through IW-52). 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 1,1-DCE in the surface water sample collected from surface water sampling point SWD-14 on October 27, 2005, was greater than 80% of the critical PCL but below the critical PCL, which requires the surface water sampling point be monitored on a quarterly schedule. The TCEQ agrees with the proposed January 2006 sampling of surface water monitoring point SWD-14. The TCEQ reserves the right to require a more aggressive response action in the future if concentrations are greater than the critical PCL.

Please submit the January 2006 quarterly sampling results for monitoring wells MW-70, MW-81, MW-93, MW-125 and surface water monitoring point SWD-14 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