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TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

September 12, 2005

Mr. Jesse McKendree
Director, Environmental Affairs
Cooper Cameron Corporation
1333 West Loop South, Suite 1700
Houston, TX 77027

Re: Comments to *Third Quarter 2005 Monitoring Data Transmittal* dated August 26, 2005, Cameron Iron Works - Katy Road Facility, 1000 Silber Road, Houston, Harris County, TX; Voluntary Cleanup Program (VCP) No. 221, RN101474880, CN600374821

Dear Mr. McKendree:

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 SWD-15:** The 0.0044 mg/L concentration of 1,1-dichloroethene detected in the surface water sample collected from surface water sampling point SWD-15 on July 19, 2005 was less than 80% of the critical Protective Concentration Level (PCL). Therefore, the TCEQ agrees that the sampling of surface water monitoring point SWD-15 return to the semiannual sampling schedule.
- Quarterly Sample Results for MW-70:** The concentrations of 1,1-dichloroethane, 1,1-dichloroethene and cis 1,2-dichloroethene in the groundwater sample collected from monitoring well MW-70 on July 19, 2005, were 0.013 mg/L, 0.0059 mg/L and 0.011 mg/L, respectively. These concentrations are greater than their respective method quantitation limits (MQLs), but below their respective PCLs, which requires the well to remain on a quarterly monitoring schedule. The concentration of trichloroethene was estimated (J-flagged) to be less than the Method Quantitation Limit and the PCL. The TCEQ agrees with the remedial response action of continued quarterly monitoring in October 2005 and 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.
- Sample Results for MW-93:** The 0.061 mg/L concentration of tetrachloroethene (PCE) detected in the groundwater sample collected from monitoring well MW-93 on July 19, 2005, was greater than the critical PCL. Concentrations of PCE detected in monitoring well MW-93 have been above the critical PCL during the previous four monitoring events beginning in October 2004 with concentrations increasing steadily to the current concentration. The TCEQ agrees with the continued quarterly monitoring for PCE in

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monitoring well MW-93, and the proposed more aggressive response action of injecting a chemical oxidant (potassium permanganate) in the vicinity of monitoring well MW-93 to address the elevated levels of PCE in this area of the plume.

Please submit the October quarterly sampling results for monitoring wells MW-70 and MW-93 when available. Future submittals should be 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
Environmental Cleanup Section II
Remediation Division

MRR/crm/ts

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