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## TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

*Protecting Texas by Reducing and Preventing Pollution*

June 30, 2005

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

Re: Comments to *First Half 2005 Monitoring Data Transmittal* dated June 10, 2005, Cameron Iron Works - Katy Road Facility, 1000 Silber Road, Houston, Harris County, TX; Voluntary Cleanup Program (VCP) No. 221, RN102221645, CN601662190

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.

- Quarterly Sample Results for MW-70:** The concentrations of 1,1-dichloroethane, 1,1-dichloroethene (1,1-DCE) and cis 1,2-dichloroethene in the groundwater sample collected from monitoring well MW-70 on April 28, 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 concentration of trichloroethene and vinyl chloride 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 in July. Cooper-Cameron originally proposed one year of quarterly monitoring in the January 12, 2005 Second Half 2004 Data Transmittal. The one year of quarterly monitoring will be completed with monitoring events in July and October 2005. 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 concentration of tetrachloroethene (PCE) detected in the groundwater sample collected from monitoring well MW-93 on April 27, 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 three monitoring events beginning in October 2004. Not only have PCE concentrations been consistently above the critical PCL, but concentrations have increased steadily to the current concentration, which is almost four times the critical PCL. Based on this increasing PCE concentration, the TCEQ requires a proposal be submitted for a more aggressive response action to address PCE in the monitoring well MW-93 area of the plume.

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3. **Sample Results for SWD-15:** The concentration of 1,1-DCE in the surface water sample collected from surface water sampling point SWD-15 on April 25, 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 July 2005 sampling of surface water monitoring point SWD-15. 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 a proposed response action to address the PCE concentration in the monitoring well MW-93 area of the plume within 30 days from the date of this letter. Also, please submit the July quarterly sampling results for monitoring well MW-70 and surface water monitoring point SWD-15 when available. Both 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  
Voluntary Cleanup Section  
Remediation Division

MRR/mn/ts

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