

June 10, 2005

Mr. Mark Riggle
Project Manager
Voluntary Cleanup Section
Texas Commission on Environmental Quality
Mail Code 221
12118 North IH 35, Building D
Austin, Texas 78753

Project No. 0031202

Subject: First Half 2005 Monitoring Data Transmittal
Former Cameron Iron Works Facility, Houston, Texas
VCP No. 221

Dear Mr. Riggle:

On behalf of Cooper Cameron Corporation, Environmental Resources Management Southwest, Inc. (ERM) is providing this transmittal of ground water and surface water data collected during the First Half 2005 Monitoring Event at the Former Cameron Iron Works Facility, Houston, Texas (the facility) for your records. In a March 22, 2004 comment letter, the Texas Commission on Environmental Quality (TCEQ) approved a routine ground water monitoring program as part of the response action for the facility. The objective of this transmittal is to determine if additional ground water or surface water samples should be collected during the next quarter (July 2005) to meet the response action objectives for the facility.

A semiannual ground water and surface water sampling schedule was initiated in September 2003. The data from this event is the fourth semiannual monitoring event since September 2003. A detailed monitoring report for the ground water and surface water analytical data collected during the second half of 2004 and the first half of 2005 will be provided to the TCEQ approximately two months after the final laboratory reports are received.

Attachment 1 provides a summary of the ground water and surface water analytical data that were collected during the first half of 2005. A review of the volatile organic ground water data summarized on Table 1 indicates that the ground water concentrations remain below the Method Quantitation Limits (MQL) and Protective Concentration Levels (PCL) for those wells outside the plume boundary south of the facility with the exception of samples collected at MW-70 and MW-93.

1,1-dichloroethane (1,1-DCA), 1,1-dichloroethene (1,1-DCE), and cis-1,2-dichloroethene were reported above the MQL but below the PCL at MW-70. A ground water sample will be collected at MW-70 during July 2005 to meet the quarterly sampling requirements approved by the TCEQ on December 30, 2004.

Tetrachloroethene (PCE) was reported above the MQL and PCL at MW-93. On March 16, 2005, the TCEQ agreed to a remedial response action of quarterly monitoring for one year until October 2005 for MW-93, therefore, a ground water sample will be collected at MW-93 during July 2005 as part of the remedial response action.


The reported surface water concentrations, summarized on Table 2, are below the Critical PCLs provided in the *Human Health and Ecological Risk Assessment for Surface Water and Sediment*, dated June 19, 2003 and 80% of the Critical PCLs, with the exception of SWD-15. Concentrations of 1,1-DCE at SWD-15 were reported above the 80% PCL value, but below the critical PCL. A surface water sample will be collected at SWD-15 during July 2005 and analyzed for 1,1-DCE.

The quality assurance/quality control data and analytical laboratory reports will be provided in the 2005 Annual Ground Water Monitoring Report and Field Activities Summary, which should be submitted to your attention in July 2005.

Please contact Mr. Jesse McKendree of Cooper Cameron Corporation at (713) 513-3325 with any questions or comments.

Sincerely,

Environmental Resources Management Southwest, Inc.



Gregory J. Wheeler, P.G.

GJW/fr
Attachments

cc: Jesse McKendree, Cooper Cameron Corporation
Bruce Himmelreich, Cooper Cameron Corporation, (without attachments)
Lance Shea, Fulbright & Jaworski L.L.P. (without attachments)
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Marsha Hill, Texas Commission on Environmental Quality, Region X II
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Tables
Attachment 1

June 10, 2005
Project No. 0031202

Environmental Resources Management
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TABLE 1

Summary of Monitor Well Ground Water Data
First Half 2005 Monitoring Data Transmittal

Former Cameron Iron Works Facility
Houston, Texas

Constituent	MQL	Critical PCLs (a)	Location:	MW-70	MW-71	MW-72	MW-74	MW-77	MW-78	MW-79	MW-80
			Depth: (b)	25	25	23	27	23	26	23	31
			Date:	4/28/2005	4/28/2005	4/28/2005	4/26/2005	4/27/2005	4/27/2005	4/27/2005	4/27/2005
1,1-Dichloroethane	0.0050	2.4		0.011	ND (0.0050)	ND (0.0050)	ND (0.0050)	ND (0.0050)	ND (0.0050)	ND (0.0050)	ND (0.0050)
1,1-Dichloroethene	0.0050	0.0070		0.0067	ND (0.0050)	ND (0.0050)	ND (0.0050)	ND (0.0050)	ND (0.0050)	ND (0.0050)	ND (0.0050)
1,2-Dichloroethane	0.0050	0.0050		ND (0.0050)	ND (0.0050)	ND (0.0050)	ND (0.0050)	ND (0.0050)	ND (0.0050)	ND (0.0050)	ND (0.0050)
cis-1,2-Dichloroethene	0.0050	0.070		0.012	ND (0.0050)	ND (0.0050)	ND (0.0050)	ND (0.0050)	ND (0.0050)	ND (0.0050)	ND (0.0050)
Tetrachloroethene	0.0050	0.0050		ND (0.0050)	ND (0.0050)	ND (0.0050)	ND (0.0050)	ND (0.0050)	ND (0.0050)	ND (0.0050)	ND (0.0050)
Trichloroethene	0.0050	0.0050		0.0021 J	ND (0.0050)	ND (0.0050)	ND (0.0050)	ND (0.0050)	ND (0.0050)	ND (0.0050)	ND (0.0050)
Vinyl Chloride	0.0020	0.0020		0.00093 J	ND (0.0020)	ND (0.0020)	ND (0.0020)	ND (0.0020)	ND (0.0020)	ND (0.0020)	ND (0.0020)

Constituent	MQL	Critical PCLs (a)	Location:	MW-81	MW-84	MW-85R	MW-86	MW-93	MW-95	MW-96	MW-97
			Depth: (b)	25	31	23	33	23	30	23	38
			Date:	4/28/2005	4/26/2005	4/28/2005	4/29/2005	4/27/2005	4/26/2005	4/28/2005	4/27/2005
1,1-Dichloroethane	0.0050	2.4		ND (0.0050)	ND (0.0050)	ND (0.0050)	ND (0.0050)	ND (0.0050)	ND (0.0050)	ND (0.0050)	ND (0.0050)
1,1-Dichloroethene	0.0050	0.0070		ND (0.0050)	ND (0.0050)	ND (0.0050)	ND (0.0050)	ND (0.0050)	ND (0.0050)	ND (0.0050)	ND (0.0050)
1,2-Dichloroethane	0.0050	0.0050		ND (0.0050)	ND (0.0050)	ND (0.0050)	ND (0.0050)	ND (0.0050)	ND (0.0050)	ND (0.0050)	ND (0.0050)
cis-1,2-Dichloroethene	0.0050	0.070		ND (0.0050)	ND (0.0050)	ND (0.0050)	ND (0.0050)	ND (0.0050)	ND (0.0050)	ND (0.0050)	ND (0.0050)
Tetrachloroethene	0.0050	0.0050		ND (0.0050)	ND (0.0050)	ND (0.0050)	ND (0.0050)	0.039	ND (0.0050)	ND (0.0050)	ND (0.0050)
Trichloroethene	0.0050	0.0050		ND (0.0050)	ND (0.0050)	ND (0.0050)	ND (0.0050)	ND (0.0050)	ND (0.0050)	ND (0.0050)	ND (0.0050)
Vinyl Chloride	0.0020	0.0020		ND (0.0020)	ND (0.0020)	ND (0.0020)	ND (0.0020)	ND (0.0020)	ND (0.0020)	ND (0.0020)	ND (0.0020)

Constituent	MQL	Critical PCLs (a)	Location:	MW-98	MW-117	MW-119	MW-122	MW-123	MW-125	MW-126	MW-131
			Depth: (b)	25	25	23	28	23	32	23	25
			Date:	4/28/2005	4/28/2005	4/28/2005	4/28/2005	4/28/2005	4/28/2005	4/29/2004	4/27/2005
1,1-Dichloroethane	0.0050	2.4		ND (0.0050)	ND (0.0050)	ND (0.0050)	ND (0.0050)	ND (0.0050)	ND (0.0050)	ND (0.0050)	ND (0.0050)
1,1-Dichloroethene	0.0050	0.0070		ND (0.0050)	ND (0.0050)	ND (0.0050)	ND (0.0050)	ND (0.0050)	ND (0.0050)	ND (0.0050)	ND (0.0050)
1,2-Dichloroethane	0.0050	0.0050		ND (0.0050)	ND (0.0050)	ND (0.0050)	ND (0.0050)	ND (0.0050)	ND (0.0050)	ND (0.0050)	ND (0.0050)
cis-1,2-Dichloroethene	0.0050	0.070		ND (0.0050)	ND (0.0050)	ND (0.0050)	ND (0.0050)	ND (0.0050)	ND (0.0050)	ND (0.0050)	ND (0.0050)
Tetrachloroethene	0.0050	0.0050		ND (0.0050)	ND (0.0050)	0.0026 J	ND (0.0050)	ND (0.0050)	0.0033 J	ND (0.0050)	ND (0.0050)
Trichloroethene	0.0050	0.0050		ND (0.0050)	ND (0.0050)	0.0014 J	0.00097 J	ND (0.0050)	ND (0.0050)	ND (0.0050)	ND (0.0050)
Vinyl Chloride	0.0020	0.0020		ND (0.0020)	ND (0.0020)	ND (0.0020)	ND (0.0020)	ND (0.0020)	ND (0.0020)	ND (0.0020)	ND (0.0020)

NOTES:

0.039 = exceedance of TCEQ Texas Risk Reduction Program (TRRP) Tier 1 Residential Class 2 Groundwater critical PCLs.

Bold value exceed the MQL

The reported concentrations are in mg/L.

ND (0.0050) = *Not Detected* at the Reporting Limit given in parentheses.

MQL = Method Quantitation Limit

(a) TCEQ Texas Risk Reduction Program (TRRP) Tier 1 Residential Class 2 Groundwater PCLs, 30-acre source area, Table 3, table for TRRP Rule dated March 31, 2005.

(b) The sample depths are reported in feet below ground surface.

J = Estimated data, the reported sample concentration is approximated due to exceedance of QC requirements.

TABLE 2

Summary of Surface Water Data
First Half 2005 Monitoring Data Transmittal

Former Cameron Iron Works Facility
Houston, Texas

Constituent	80% Critical	Critical	Location:	SWD-12	SWD-14	SWD-15
	PCL (a)	PCLs (a)		Date:	4/25/2005	4/25/2005
1,1-Dichloroethane	4.10	5.13		0.0017 J	0.0071	0.0074
1,1-Dichloroethene	0.05	0.06		0.0059	0.050	0.059
1,2-Dichloroethane	0.443	0.554		ND (0.0050)	ND (0.0050)	ND (0.0050)
cis-1,2-Dichloroethene	7.49	9.36		ND (0.0050)	0.0014 J	0.0039 J
Tetrachloroethene	0.632	0.790		ND (0.0050)	0.0030 J	0.010
Trichloroethene	0.888	1.110		0.00094 J	0.0028 J	0.0039 J
Vinyl Chloride	0.0269	0.0336		ND (0.0020)	0.0037	0.0051

Constituent	80% Critical	Critical	Location:	SWD-17	SWD-18	SWD-20
	PCL (a)	PCLs (a)		Date:	4/25/2005	4/25/2005
1,1-Dichloroethane	4.10	5.13		0.0013 J	ND (0.0050)	ND (0.0050)
1,1-Dichloroethene	0.05	0.06		0.0088	0.0063	ND (0.0050)
1,2-Dichloroethane	0.443	0.554		ND (0.0050)	ND (0.0050)	ND (0.0050)
cis-1,2-Dichloroethene	7.49	9.36		0.0013 J	0.0011 J	ND (0.0050)
Tetrachloroethene	0.632	0.790		0.0037 J	0.012	0.0022 J
Trichloroethene	0.888	1.110		0.0020 J	0.0015 J	ND (0.0050)
Vinyl Chloride	0.0269	0.0336		ND (0.0020)	ND (0.0020)	ND (0.0020)

NOTES:

The reported concentrations are in mg/L.

ND (0.0050) = *Not Detected* at the Reporting Limit given in parentheses.

J = Estimated data, the reported sample concentration is approximated due to exceedance of QC requirements.

Bold values indicate an exceedance of the 80% critical Protective Concentration Level (PCL).

(a) Taken from the critical PCLs calculated in the *Human Health Ecological Risk Assessment for Surface Water and Sediment*, dated June 2003.

SWD = Surface Water Harris County Flood Control Ditch.