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TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

January 25, 2005

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

Re: Comments to *Second Half 2004 Confirmation Data Transmittal* dated January 12, 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.

Comments:

1. **Confirmation Sample Results for MW-126:** The TCEQ agrees that the concentrations of chemicals of concern (COCs) in the confirmation sample collected from monitoring well MW-126 on December 10, 2004 were *Not Detected* at the reporting limit and were below the critical protective concentration levels (PCLs) for all COCs. However, the TCEQ disagrees with the proposal that the sampling of this monitoring well returns to the semi-annual sampling schedule. Based on the previously agreed upon method that will be used to determine when more frequent monitoring or remedial response actions will be required, the well should be on a quarterly monitoring schedule. If the results of the next quarterly monitoring indicate that all COC concentrations remain below their critical PCL, the well can return to the semi-annual sampling schedule.
2. **Confirmation Sample Results for MW-93:** The concentration of tetrachloroethene detected in the confirmation sample was greater than the critical PCL and confirms the PCL exceedence detected during the October 26, 2004 sampling event. Based on this PCL exceedence, a remedial response action is required. Cooper Cameron has proposed quarterly monitoring of the COCs for one year at monitoring well MW-93 as the response action. The TCEQ accepts the proposed response action at the present time; but reserves the right to require a more aggressive response action in the future if concentrations remain above the critical PCL or show an increase. The TCEQ accepts the proposed quarterly sampling schedule and the data transmittal schedule.

Mr. Jesse McKendree

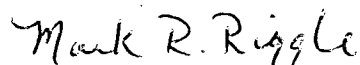
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3. **Confirmation Sample Results for MW-70:** The concentrations of 1,1-dichloroethane and cis 1,2-dichloroethene in the confirmation sample collected from monitoring well MW-70 on December 10, 2004, were greater than their respective method quantitation limits, but below their respective PCLs, which requires the well to be monitored on a quarterly schedule. The concentration of 1,1-dichloroethene detected in the confirmation sample was greater than the critical PCL and confirms the PCL exceedence detected during the October 26, 2004 sampling event. Based on this PCL exceedence, a remedial response action is required. Cooper Cameron has proposed quarterly monitoring of the COCs for one year at monitoring well MW-70 as the response action. The TCEQ accepts the proposed response action at the present time, but reserves the right to require a more aggressive response action in the future if concentrations remain above the critical PCL or show an increase. The TCEQ accepts the proposed quarterly sampling schedule and the data transmittal schedule.
4. **Proposed Change to the Sampling and Analysis Plan:** The TCEQ agrees with the proposal of discontinuing the analysis for concentrations of antimony and copper in groundwater in monitoring wells KMW-11, KMW-13, KMW-14, KMW-15 and KMW-16 in the Cooling Water Pond Area, based on 13 years of groundwater data that indicate that concentrations are below the critical groundwater PCLs.

A response to these comments must be submitted to my attention at the TCEQ at the letterhead address using mail code MC-221. Your response must be received on or before 30 days from the date of this letter. Should you need additional information or wish to discuss these comments or due date, 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