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TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

December 30, 2004

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

Re: Comments to *Second Half 2004 Monitoring Data Transmittal* dated December 9, 2004,
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. The referenced report generally meets the requirements of the August 2003 Response Action Plan; however, the TCEQ has the following comments. A written response to these comments is not required at this time.

Comments:

1. The TCEQ acknowledges the reported increase of several chemicals of concern (COC) concentrations above historic concentrations in monitoring wells MW-70, MW-93 and MW-126 during the October 2004 sampling event. Cooper Cameron has indicated that an additional groundwater sample will be collected from these monitoring wells in December 2004 and analyzed for constituents that had reported concentrations above the Method Quantitation Limit (MQL) or the Protective Concentration Level (PCL).

Please provide the results of the additional sampling of these monitoring wells within 30 days of obtaining the confirmation sampling results. Based on the results of the additional sampling and analysis for individual constituents, additional quarterly monitoring or the proposal of a response action may be required.

2. Future Groundwater Data Transmittals and Annual Groundwater Monitoring Reports should include a separate table that lists the wells located outside of the groundwater plume south of IH-10 that have constituent concentrations that exceed the individual MQLs and PCLs. This table should list the current constituent concentration in each well and the MQL and PCL for each COC.

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Should you need additional information or wish to discuss these comments, please call me at (512) 239-3044.

Sincerely,

Mark R. Riggle

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