

Bryan W. Shaw, Ph.D., P.E., *Chairman*  
Toby Baker, *Commissioner*  
Zak Covar, *Commissioner*  
Richard A. Hyde, P.E., *Executive Director*



## TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

*Protecting Texas by Reducing and Preventing Pollution*

July 22, 2014

Mr. Ted Fasting  
Director, Environmental Health & Safety  
Cameron International Corporation  
1333 West Loop South, Suite 1700  
Houston, Texas 77027

Re: Comments to *Second Addendum to Response Action Plan (RAP)*, dated August 28, 2003 Former Cameron Iron Works Facility; 1000 Silber Road, Houston, Harris County, Texas; Voluntary Cleanup Program (VCP) No. 221; RN101474880, CN600405872

Dear Mr. Fasting:

The VCP of the Texas Commission on Environmental Quality (TCEQ) has reviewed the above mentioned submittal prepared by ERM. After careful review, the TCEQ is not able to approve the RAP at this time. If necessary, please respond to the noted comment by referencing its corresponding number:

- 1) The supplied data found within the above noted RAP does not give the agency a clear picture as to when/if the contamination will reach the dewatering system (DS) and what the concentrations are likely to be. Figure 1 of the RAP only depicts one well east of the plume, and shows that the plume is not delineated. Please submit a work plan showing the proposed installation locations of the additional assessment wells.
- 2) Areas of the plume not affected by the DS (as depicted in Figure 1 of the noted RAP) are still required to be addressed through remedial actions. Please explain how this will be accomplished.
- 3) In order to properly advance the site to closer, delineation (vertically and horizontally) must be achieved for each plume as shown on Figure 1 of the noted RAP. Four of the five plumes have estimated edges (dashed lines) which usually are not indicative of a defined or delineated area of contamination. Please move forward with the necessary efforts to complete delineation.

Mr. Ted Fasting  
Page No. 2  
July 22, 2014  
VCP No. 221

Please reference VCP No. 221 on the front of any future letters or reports. Future submittals should be mailed to the TCEQ, Voluntary Cleanup Program, mail code MC-221, at the letterhead address. You may contact me with any questions at (512) 239-2205.

Sincerely,



*for* Rodney Bryant, Project Manager  
VCP-CA Section  
Remediation Division

RB/jdm

cc: Mr. Frank M.K. Liu, President, Silber Pads, Ltd., Houston, Texas  
Ms. Lisa Shelton, Attorney, Andrews Kurth LLP, Austin, Texas  
Mr. Paul Stefan, P.G., Environmental Resources Management, Houston, Texas  
Mr. Brian T. Weaver, P.G., SKA Consulting, L.P., Houston, Texas  
Mr. Jason Ybarra, Waste Section Manager, TCEQ Region 12 Office, Houston