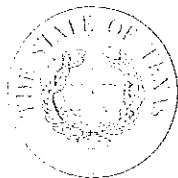


Bryan W. Shaw, Ph.D., *Chairman*
Carlos Rubinstein, *Commissioner*
Toby Baker, *Commissioner*
Zak Covar, *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

December 7, 2012

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

Re: Comments to Third Quarter 2012 Monitoring Data Transmittal dated December 3, 2012, Former Cameron Iron Works - Katy Road Facility, 1000 Silber Road, Houston, Harris County, Texas; Voluntary Cleanup Program (VCP) No. 221; RN101474880, CN600374821

Dear Mr. Fasting:

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. No response to these comments is required.

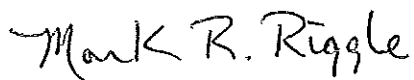
1. The TCEQ agrees with the continued quarterly monitoring of chemical of concern (COC) concentrations in groundwater at trigger wells MW-59, MW-74, MW-84, MW-122, MW-125, MW-134, MW-145, MW-146, MW-169, and MW-174 as shown on Table 1.
2. The TCEQ notes that the presence of permanganate will be monitored in the wells comprising the injection galleries and select monitoring wells in the treatment areas.
4. The TCEQ understands that the dewatering project at the I-610/I-10 Interchange is continuing to influence concentration trends in some areas of the onsite and offsite plumes causing movement of affected groundwater into previously unaffected areas. The TCEQ also notes that Cameron has taken action to address elevated concentrations of COCs at select well locations where upward concentration trends were identified. The actions include expanding of treatment galleries in February and July 2011 followed by 60 sodium permanganate injections across the area. Additionally, 20 more sodium permanganate injections were completed in the Pinewood Estates area in March 2012. The TCEQ notes that Cameron will continue to evaluate the adequacy of the monitoring well network to delineate the extent of the affected groundwater.

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5. The TCEQ understands that a Revised Response Action Plan is being developed, pending outcomes of discussions between Cameron and various stakeholders concerning the I-610/I-10 dewatering system and its influence on the groundwater plume, and feasible remediation alternatives.
6. The next groundwater monitoring event was scheduled for completion in November 2012.

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

Sincerely,



Mark R. Riggle, P.G., Project Manager
VCP-CA Section
Remediation Division
Texas Commission on Environmental Quality

MRR/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
Ms. Nicole Bealle, Waste Section Manager, TCEQ Region 12, Houston