

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

September 18, 2012

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

Re: Comments to First Half 2012 Monitoring Data Transmittal dated August 27, 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.

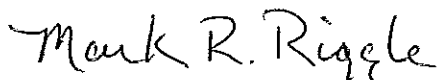
1. The TCEQ agrees with the continued quarterly monitoring of COC concentrations in groundwater at trigger wells MW-59, MW-74, MW-84, MW-122, MW-125, MW-134 and MW-174 as shown on Table 1.
2. The TCEQ notes that the presence of permanganate will be monitored in the wells comprising the injection galleries 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. Groundwater samples collected from monitoring wells MW-145, MW-146, and MW-169 reported protective concentration level (PCL) exceedances for the first time in the first half 2012 sampling event. The TCEQ notes that Cameron will add these three monitoring wells to the quarterly monitoring schedule and will continue to evaluate the adequacy of the monitoring well network to delineate the extent of the affected groundwater. Additionally, 25 notification letters were sent to property owners in the eastern and southern portions of Pinewood Estates and northern Stablewood areas.

Mr. Ted Fasting
Page 2
September 18, 2012
VCP No. 221

5. The TCEQ notes that the third quarter sampling event was scheduled for August 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/mdh

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