

## TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

July 25, 2012

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

Re: Comments to First Quarter 2012 Monitoring Data Transmittal dated July 11, 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 notes the concentrations of chemicals of concern (COCs) in trigger well MW-173 in the Stablewood Subdivision have been reported as *Not Detected* since October 2010. The TCEQ agrees with the semiannual monitoring of this well to assess the effectiveness of the remediation system.
- 2. The TCEQ agrees with moving trigger well MW-171 to the semiannual sampling schedule since COC concentrations have been below the protective concentration levels since August 2008.
- 3. 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.
- 4. 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.
- 5. The TCEQ notes that the drought and dewatering project at the I-610/I-10 Interchange are influencing concentration trends in some areas of the offsite

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plume. TCEQ notes that Cameron continues to implement corrective actions at the site and will submit an Amended Response Action Plan in the Summer of 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