

## TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

July 23, 2012

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

Re: Comments to 2011 Annual Groundwater Monitoring Report and Field Activities
Summary dated July 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 quarterly monitoring of chemical of concern (COC) concentrations in groundwater at monitoring trigger wells MW-59, MW-74, MW-84, MW-122, MW-125, MW-134, MW-171 MW-173 and MW-174 as the remedial response action.
- The TCEQ notes that the concentrations of all constituents in the surface water samples collected from the six Harris County Flood Control District Ditch (HCFCDD) surface water sampling points during the May 2 and November 23, 2011 sampling events were below the critical PCLs and 80% of the critical PCLs.
- 3. The TCEQ approves the revised list of trigger wells and their sampling frequency as shown on Table 3-3.
- 4. The TCEQ notes Cameron intends to shut down the groundwater recovery system in the Stablewood Subdivision and begin a rebound study, assuming there are no PCL exceedances in the area monitoring wells. The groundwater recovery system has pulled back and reduced the southern extent of the affected groundwater plume by nearly 250-feet in some areas, and is achieving the remedial objectives.
- 5. The TCEQ notes that a second Addendum to the Response Action Plan (RAP) is underway to address apparent plume migration in the Pinewood Estates area caused by the Texas Department of Transportation (TxDOT) dewatering system at the IH-10 and IH-610 interchange area.

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6. The TCEQ appreciates that Cameron has performed a significant amount of work to remediate areas of affected groundwater and limit plume migration, and that Cameron will continue to perform the actions necessary to comply with the Response Action Plan and Phased Conditional Certificate of Completion for the site.

Please submit future groundwater monitoring results to my attention at the TCEQ at the letterhead address using mail code MC-221. Should you need additional information or wish to discuss these comments, please call me at (512) 239-3044.

Sincerely,

mouk R. Riggle

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, Fenway Development, Inc., Houston, TX

Ms. Lisa Shelton, Attorney, Andrews Kurth LLP, Austin, TX

Mr. Paul Stefan, P.G., Environmental Resources Management, Houston, TX

Mr. Brian T. Weaver, P.G., SKA Consulting, L.P., Houston, TX

Ms. Nicole Bealle, Waste Section Manager, TCEO Region 12 Office, Houston