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Carlos Rubinstein, Commissioner
Mark R. Vickery, P.G., Executive Director



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

March 21, 2012

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

Re: Comments to Second Half 2012 Monitoring Data Transmittal dated March 8, 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 the operation of the remediation system began in June 2010.
- 2. 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, MW-173, and MW-174 as shown on Table 1.
- 3. The TCEQ agrees with the semi-annual monitoring of MW-171, since COC concentrations have been below the protective concentration levels (PCLs), but above the Method Quantitation Limits (MQLs) since August 2008.
- 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 plume, and that additional data collection activities are underway to modify the response action. A Revised Response Action Plan will be provided to the TCEQ.

 P.O. Box 13087 Austin, Texas 78711-3087 512-239-1000 www.tceq.texas.gov

Mr. Ted Fasting Page 2 March 21, 2012 VCP No. 221

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

Sincerely,

Mark 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, Silber Pads, Ltd., Houston, 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 Office, Houston