

Bryan W. Shaw, Ph.D., *Chairman*  
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## TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

*Protecting Texas by Reducing and Preventing Pollution*

October 18, 2010

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

Re: Comments to First Half 2010 and Third Quarter 2010 Monitoring Data Transmittal dated October 11, 2010 and October 13, 2010, 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 submittals. 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.

### First Half 2010 Monitoring Data Transmittal

1. The TCEQ agrees with the conclusions and recommendations presented in the report and have no other technical comments.

### Third Quarter 2010 Monitoring Data Transmittal

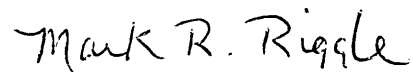
1. The TCEQ agrees that chemical of concern (COC) concentrations should be monitored at monitoring wells MW-59, MW-74, MW-84, MW-125, MW-134, and MW-173 on a quarterly schedule.
2. The TCEQ notes that 1,1-dichloroethene (1,1-DCE) concentrations in monitoring well MW-173 exceed the critical protective concentration level (PCL) and therefore will continue to be monitored quarterly to assess the effectiveness of the new groundwater extraction system.
3. The TCEQ notes that the 1,1-DCE concentrations in monitoring well MW-59 exceed the critical groundwater PCL and continue to increase. While this affected groundwater appears to lie within the capture zone of the northern groundwater extraction system, the increasing concentrations would suggest that the groundwater extraction system is not capturing this contamination. Please be aware that if the quarterly monitoring of this well does not begin to show a decrease in the concentration of 1,1-DCE, a response action to address this contamination will be required.
4. The TCEQ notes that COC concentrations in monitoring well MW-84 continue to increase suggesting the extent of affected groundwater in this area is expanding and needs to be addressed.

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The TCEQ notes that monitoring/injection wells will continue to be monitored for the presence of permanganate so that additional injections can be performed as necessary to reduce COC concentrations in groundwater in these areas.

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, 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 Program Manager, TCEQ Region 12, Houston