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TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

May 5, 2010

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

Re: *Comments to 2009 Annual Groundwater Monitoring Report and Field Activities Summary* dated April 26, 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 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-125, MW-134, MW-171 and MW-173 as the remedial response action.
2. The TCEQ notes that some groundwater plume migration is occurring in the areas of monitoring wells MW-59, MW-166 and MW-84. However, remedies have been implemented in all of these areas to address this migration.
3. The TCEQ notes that the concentrations of all constituents in the surface water samples collected from the six Harris County Flood Control District Ditch (HCFD) surface water sampling points during the April 14 and October 20, 2009 sampling events were below the critical PCLs.
4. The TCEQ approves the following changes to the list of trigger wells for the site. Monitoring well MW-17R is added to the list on a semi-annual sampling schedule. Monitoring well MW-99 will replace monitoring well MW-95 and will be on a semi-annual sampling schedule. Monitoring well MW-134 will replace monitoring well

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MW-132 and will be on a quarterly sampling schedule. Monitoring well MW-168 will replace monitoring well MW-167 and will be on a semi-annual sampling schedule.

5. The TCEQ notes the installation of a southern groundwater recovery system in the Stablewood Subdivision to address groundwater plume migration in that area. The system began operation on April 7, 2010. A Response Action Completion Report will be submitted to the TCEQ to document this response action.
6. The TCEQ notes that two sodium permanganate injection events were completed in 2009. The first event conducted between February 27 and March 18, 2009, consisted of injecting sodium permanganate into 46 monitor/injection wells to limit the potential for plume migration. The second event was conducted December 8 through 23, 2009, and consisted of injecting sodium permanganate into 53 monitor/injection wells to limit the potential for plume migration.
7. The TCEQ notes 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,



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