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TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

January 28, 2009

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

Re: Comments to *2008 Annual Groundwater Monitoring Report and Field Activities Summary* dated January 14, 2009, 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 continued quarterly monitoring of chemical of concern (COC) concentrations in groundwater at monitoring wells MW-170, MW-171, MW-172 and MW-125 as the remedial response action.

However, the TCEQ is concerned about the expansion of the Sandringham Drive 1,1-dichloroethylene (1,1-DCE) plume in the Stablewood Subdivision. Trigger well MW-167 has contained 1,1-DCE concentrations above the critical protective concentration level (PCL) during the last four sampling events. Additionally, these concentrations have been increasing. The TCEQ requests that an additional monitoring well be installed south and downgradient of monitoring well MW-167 to provide the required delineation of the 1,1-DCE plume.

2. 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 13, 2008 sampling events were below the critical PCLs. However, the reported concentration of 1,1-DCE in the October 2008 surface water sample from SWD-15 exceeded 80% of the critical PCL which requires continued quarterly sampling. The TCEQ agrees with the proposed quarterly sampling of SWD-15 during the January 2009 sampling event, and the continued

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collection of surface water samples semiannually from the six HCFDOD sampling locations.

3. The TCEQ agrees with the continued semiannual groundwater monitoring during 2009 for the network of monitoring wells at the site, and quarterly monitoring at select wells.

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
Team 3, Environmental Cleanup Section II
Remediation Division
Texas Commission on Environmental Quality

MRR/sr

cc: Mr. Frank M.K. Liu, President, Fenway Development, Inc., Houston, TX
Ms. Lisa Shelton, Attorney, Andrews Kurth LLP, Austin, TX
Mr. Gregory J. Wheeler, P.G., Environmental Resources Management, Houston, TX
Mr. Brian T. Weaver, P.G., SKA Consulting, L.P., Houston, TX