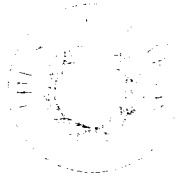


Kathleen Hartnett White, *Chairman*
Larry R. Soward, *Commissioner*
H. S. Buddy Garcia, *Commissioner*
Glenn Shankle, *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

June 19, 2007

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

Re: Comments to First Half 2007 Monitoring Data Transmittal dated May 31, 2007, 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.

Sample Results for MW-70: The concentrations of 1,1-dichloroethane (1,1 DCA) and cis-1,2-dichloroethene (cis-1,2-DCE) in the groundwater sample collected from monitoring well MW-70 on April 24, 2007, were above than the method quantitation limits (MQLs), but below the Protective Concentration Levels (PCLs), which requires the well to remain on a quarterly monitoring schedule. The TCEQ agrees with the remedial response action of continued quarterly monitoring of MW-70. The TCEQ reserves the right to require a more aggressive response action in the future, if concentrations are above the critical PCL or show an increase.

Sample Results for MW-78, MW-79 and MW-96: The concentration of 1,1-dichloroethene (1,1-DCE) in the groundwater sample from monitoring well MW-78 on April 24, 2007 was above the MQL and the PCL. The concentration of 1,1-DCE in the groundwater sample from monitoring well MW-79 on April 24, 2007 was above the MCL and the PCL. A confirmation sample collected from MW-79 on May 21, 2007 also contained a concentration of 1,1-DCE above the MQL and the PCL. The concentration of 1,1-DCE in the groundwater sample from monitoring well MW-96 on April 26, 2007 was above the MQL and the PCL.

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The TCEQ agrees with the continued quarterly monitoring of COC concentrations at these wells until concentrations are below the Method Quantitation Limits (MQLs). However, the TCEQ disagrees with providing notification letters to the appropriate property owners after four consecutive quarters with concentrations above the PCLs. Notifications should be made to the appropriate property owners as soon as possible.

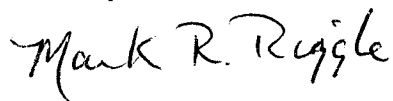
The TCEQ agrees with the delineation of affected groundwater in the area of monitoring wells MW-78, MW-79 and MW-96 and the proposed in-situ chemical oxidation as the active response action to address the residential groundwater protective concentration level (PCL) exceedences in the vicinity of these monitoring wells.

Sample Results for MW-93 and MW-125: Tetrachloroethene (PCE) has been reported at concentrations above the MCL and PCL for the samples collected from monitoring wells MW-93 and MW-125 for each quarter since September 2005. A response action which consisted of a permanganate injection was performed at injection wells IW-49 on March 27, 2007 and IW-47 on April 2, 2007.

The TCEQ agrees with the continued quarterly groundwater monitoring at monitoring wells MW-93 and MW125 as part of the remedial response action, and the monthly evaluation of the presence of permanganate in injection wells (IW-47 through IW-52) from prior injection events.

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/MH/jhm

cc: Mr. Frank M.K. Liu, President, Silber Pads, Ltd., Houston, TX
Mr. Gregory J. Wheeler, P.G., Environmental Resources Management, Houston, TX
Mr. Brian T. Weaver, P.G., SKA Consulting, L.P., Houston, TX