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## TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

*Protecting Texas by Reducing and Preventing Pollution*

June 7, 2022

Ms. Dawn Greening, Remediation Manager  
Cooper Cameron Corporation  
For Cameron International Corporation  
121 Industrial Boulevard  
Sugar Land, Texas 77478

Re: Cameron - Katy Road Facility (Site), located at 1000 Silber Road, Houston, Harris County, TX; Voluntary Cleanup Program (VCP) No. 221; Customer No. CN600374821 Regulated Entity No. RN101474880

Dear Ms. Greening:

The Texas Commission on Environmental Quality (TCEQ) has reviewed the March 30, 2022 report entitled "2021 Response Action Effectiveness Report" (RAER), prepared by CH2M HILL Engineers, Inc. The TCEQ understands that a revised Response Action Plan (RAP) will be submitted by June 30, 2022. Please respond directly to Comments 2, 3, 8, and 9; incorporate responses to the remaining comments into the RAP. The information in the TCEQ reference line above should be included in your response.

### Monitored Natural Attenuation (MNA) Results

1. Based on information provided, chemical of concern (COC) concentrations appear to be increasing over time within the onsite plume, downgradient of the former facility (at MW-113, MW-15R, and MW-16R); along the downgradient (southern) edge of the offsite plume (at MW-161, MW-168, MW-97, MW-93R, MW-98, and MW-179); and at scattered locations within the off-site plumes (MW-89, MW-74, and MW-147). Furthermore, the southern offsite plume appears to be migrating to the south. Finally, the contaminant plumes are no longer delineated at MW-113, MW-65, MW-106, and MW-93R. As such, data indicates that MNA alone is not a sufficient remedy for the on-site and off-site plumes. The TCEQ understands that the revised RAP will address plume migration and the increasing COC concentrations. Remedial activities should be conducted as soon as possible at the monitoring wells/areas mentioned above.

### Additional Sampling

2. 1,1-dichloroethene was detected for the first time above the critical protective concentration level (PCL) in monitoring well MW-163. Please re-sample this well within the next three months and submit the results to the TCEQ. If the PCL exceedance (PCLE) is confirmed, property owners within the new PCLE zone will need to be notified, and remedial actions will need to be conducted in this area.

3. Two surface sampling locations, SWD-12 and SWD-14 could not be sampled due to unsafe access conditions associated with heavy rains. These two sampling locations are directly downgradient of monitoring well MW-89, where COC concentrations exceed critical PCLs and appear to be increasing. Therefore, please collect a surface water sample at SWD-12 and SWD-14 when access conditions are safe and submit the results to the TCEQ.
4. Due to the apparently increasing trend in COC concentrations at MW-98 and MW-179, please sample downgradient monitoring well MW-180 during the next site-wide sampling event.

Proposed plume management zone (PMZ)

5. Monitoring well MW-65 is located along the downgradient boundary of the proposed PMZ. As such, the well must be considered point of exposure (POE) well and concentrations be compared with groundwater ingestion PCLs.
6. The proposed PMZ includes three attenuation monitoring points (AMPs) along the centerline of the onsite plume. Due to the size of the plume, AMP wells are also needed in the southeastern portion of the former facility. While these wells were not required when the North Treatment system was in operation, they are now requested for plume monitoring, especially detection of plume migration before it reaches POE wells. Please add additional AMPs on the southeastern portion of the site (upgradient of POE wells MW-110, MW-111, MW-112, MW-113 and MW-65).

PCL Exceedance (PCLE) Zone Map

7. Please extend the groundwater PCLE zones to include locations where exceedances were previously documented. If you choose instead to collect grab groundwater samples at these locations to justify the proposed PCLE zone boundaries, please note that 1) grab samples are not representative of groundwater conditions and will be accepted as delineation samples only if results are not detected or below the quantitation limit; and 2) results from grab samples will be valid for a limited time - new delineation samples may be required at the same locations in the future.

Notifications according to 30 Texas Administrative Code (TAC) §350.55

8. The 2021 RAER documents the completion of notification required under 30 TAC §350.55. As previously stated in a TCEQ September 7, 2021 email, annual notifications are not requested by the TCEQ, although additional notification is required if new data indicates that the plume is migrating onto properties that were not previously affected. The 2021 RAER documents notification for properties with a monitoring well and properties not previously notified. Per 30 TAC §350.55(d), please provide documentation (i.e., notarized statement listing notified owners) that notifications have also been completed for all properties currently located within the PCLE zone. If previous notification cannot be confirmed, please re-notify these properties.
9. Please provide a figure showing notified properties, the PCLE zone boundary, and location of monitoring wells. Please include an ID number in the notification map and table to cross-reference each notified property.

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A response to Comments 2, 3, 8, and 9 should be submitted to my attention at the TCEQ at the letterhead address using mail code MC-221. Your response should be received within 90 days of the date of this letter. Please provide one paper copy and one electronic copy (on USB or disc) of all submittals. Note that the electronic and hard copies should be identical, complete copies. A Correspondence ID Form (TCEQ Form 20428) must accompany each document submitted to the Remediation Division and should be affixed to the front of your submittal. The Correspondence ID Form helps ensure that your documents are identified correctly and are routed to the applicable program for a timely response. You may contact me with any questions at (512) 239-0217.

Sincerely,



Vitalie Morrison, P.G., Project Manager  
VCP-CA Section  
Remediation Division  
Texas Commission on Environmental Quality

cc: Mr. Matthew Parish, Taunton, Snyder & Slade  
Ms. Monica Schneider, CH2M HILL Engineers, Inc.  
Mr. David Urann, CH2M HILL Engineers, Inc.  
Mr. John Knott, CH2M HILL Engineers, Inc.  
Mr. Jason Ybarra, Waste Section Manager, TCEQ Region 12 Office, Houston