Texas Commission on Environmental Quality Remediation Division Correspondence Identification Form

SITE & PROGRAM AREA IDENTIFICATION									
SITE LOCATION					REMEDIATION DIVISION PROGRAM AND FACILITY				
					IDENTIFICATION				
Site Name: Former Cameron Iron Works Facility				lity	Is This Site Being Managed Under A State Lead Contract?				
					Yes	✓ No			
Address 1: 1000 Silber Road					Program Area:	VOLUNTARY	VOLUNTARY CLEANUP PROGRAM		
Address 2:					Mail Code:	MC-221	MC-221		
City: Houston State: Texas				Texas	Is This A New Site To This Program Area?				
					Yes	✓ No			
Zip Code: 7	7055	County:	Harris	-	VCP No.:		221		
TCEQ Region: Region 12 - Houston			Leave This Fi	eld Blank	Leave This Field Blank				

DOCUMENT(S) IDENTIFICATION					
PHASE OF REMEDIATION	DOCUMENT NAME				
1. REMEDIATION	RESPONSE TO COMMENTS				
2.					
3.					
4.					
5.					

CONTACT INFORMATION						
		continerin				
RESPONSIBLE PARTY/APPLICANT/CUSTOMER						
Name:	Dawn Greening, Remediation	Manager				
Company:	Schlumberger	Phone Number:	(318) 393-6480	Fax Number:		
Address 1:	121 Industrial Boulevard	City: Sugar	Land State:	TX	Zip Code:	77478
Address 2:		Email Address:	DGreening@slb.cor	n	-	
	ENVIRONME	NTAL CONSULTA	NT/REPORT PREP	ARER	AGENT	
Name:	John Knott, Project Manager					
Company:	CH2M HILL Engineers, Inc.	Phone Number:	(409) 781-8015		Fax Number:	
Address 1:	7790 Village Drive	City: Beaun	nont State:	ТХ	Zip Code:	77713
Address 2:		Email Address:	john.knott@jacobs.	com		
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TCEQ INTERNAL USE ONLY					
Document No.	TCEQ Database Term	Document No.	TCEQ Database Term		
1.	RESPONSE TO COMMENTS	4.			
2.		5.			
3.					

TCEQ - 20428/Remediation Division Correspondence Identification Form June 2008

Cameron International Corporation 121 Industrial Boulevard Sugar Land, TX 77478 Tel: (281) 285-4747



January 24, 2023

Ms. Vitalie Morrison, P.G., Project Manager Voluntary Cleanup Section Texas Commission on Environmental Quality Mail Code 221 12100 Park 35 Circle, Building D Austin, Texas 78753

Re: Response to TCEQ Comments Letter dated October 24, 2022 Former Cameron Iron Works Facility 1000 Silber Road, Houston, Texas Voluntary Cleanup Program (VCP) No. 221 CN No. 600374821; RN No. 101474880

Dear Ms. Morrison,

This letter is submitted in response to the Texas Commission on Environmental Quality (TCEQ) comment letter¹ dated October 24, 2022, which requested written responses to TCEQ comments on the Cameron International Corporation (A Schlumberger Company; Cameron) comment response letter² dated August 22, 2022, regarding TCEQ comments on the 2021 Response Action Effectiveness Report (RAER) for the Former Cameron Iron Works Facility located at 1000 Silber Road, Houston, Texas (site). TCEQ provided initial comments on the 2021 RAER on June 7, 2022.³ For ease of review below, the TCEQ comment is restated, followed by Cameron's response.

TCEQ Comment No. 1

Affidavit of Notifications: The affidavit of §350.55 notifications was signed by the consultant. Per 30 Texas Administrative Code (TAC) §350.55(d), the affidavit should be signed by the person or their appropriate agent. Please submit an affidavit stating that the consultant is an "authorized agent for purposes of §350.55" or an affidavit of notifications signed by the Applicant.

Response to TCEQ Comment No. 1: CH2M HILL Engineers, Inc. (CH2M) signed the initial affidavit associated with the property owner notifications as documented in Appendix B of the 2021 RAER. TCEQ did not comment on this approach in the initial set of comments received on the 2021 RAER on June 7, 2022. CH2M also signed the affidavit associated with subsequent property owner notifications as documented in the response to comments letter submitted to TCEQ on August 22, 2022. In response to the most recent TCEQ comment, 30 TAC §350.55 and Texas Risk Reduction Program (TRRP-17) guidance were reviewed for language that would require a separate affidavit to be signed by Cameron to formally acknowledge CH2M as an "authorized agent." No such requirement was identified. Further, Cameron signed the overall document that contained the affidavit of notifications certified by CH2M. Cameron believes this

¹ Texas Commission on Environmental Quality (TCEQ). 2022a. *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. RC101474880.* October 24.

² Cameron International Corporation (A Schlumberger Company). 2022. *Response to TCEQ Comments on 2021 Response Action Effectiveness Report Dated June 7, 2022, Former Cameron Iron Works Facility, 1000 Silber Road, Houston, Texas, Voluntary Cleanup Program (VCP) No. 221, CN No. 600374821; RN No. 101474880. August 22.*

³ Texas Commission on Environmental Quality (TCEQ). 2022b. 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. RC101474880. June 7.

Ms. Vitalie Morrison January 24, 2023 Page 2

is sufficient evidence to acknowledge that CH2M is considered an authorized agent and, as a result, additional justification is unnecessary.

TCEQ Comment No. 2

Notifications – A table listing the notified properties and how they were notified ("Summary of Property Owner Notification Status") was included in your submittal. However, some information could not be verified. Notification for a property located at 7625 Katy Freeway (Map ID No. 1261) was not found in the 2001 APAR. Additionally, the following properties were not found listed in the 2007 settlement agreement: 8914 Memorial Drive (Map ID 7186), 8811 Sandringham (Map ID 7157), 0 Carnarvon Drive (Map ID 7527), 104 Farish Circle (Map ID No. 2), and 0 Farish Circle (Map IDs 7526 and 7718). These properties are shown to be within the current PCLE zones. Please explain how these properties were notified or provide new notifications.

Response to TCEQ Comment No. 2: The following information regarding the properties listed is provided based on a review of existing records:

- 7625 Katy Freeway (Map ID 1261): Cameron sent a notification letter to the property owner listed by the Harris County Appraisal District in December 2022. Attachment 1 contains a copy of the notification letter.
- 0 Carnarvon Drive (Map ID 7527): Cameron sent a notification letter to the property owner listed by the Harris County Appraisal District in December 2022. Attachment 1 contains a copy of the notification letter.
- 8811 Sandringham Drive (Map ID 7157) is the same property as 0 Sandringham Drive in the Settlement Agreement, and the property owner was notified as part of the Settlement Agreement.
- 8914 Memorial Drive (Map ID 7186) is the same property as 0 Memorial Drive in the Settlement Agreement, and the property owner was notified as part of the Settlement Agreement.
- Three parcels were originally specified at Farish Circle in the Settlement Agreement (14, 101, and 120 Farish Circle). Based on current Harris County Appraisal District records, the parcels at 101 and 120 Farish Circle were subdivided and now include 104 Farish Circle (Map ID No. 2) and 0 Farish Circle (Map IDs 7526 and 7718).
 - The property owners for each of the original three parcels were previously notified as part of the Settlement Agreement, and the Settlement Agreement includes a requirement that a Notice to Buyer (included in Schedule C) be provided with any subsequent Contract for Sale. While copies of any related Contract for Sale and/or notifications to buyers associated with such property transactions are not available, the notification requirements for parcels located at 0 Farish Circle and 104 Farish Circle have been met in accordance with the requirement of the Settlement Agreement. However, Cameron sent an additional notification letter to the two property owners listed by the Harris County Appraisal District in January 2023 to further ensure the notification requirements have been met. Attachment 1 contains a copy of both notification letters.

Please call me at (318) 393-6480 with any questions or concerns. I can also be emailed at <u>DGreening@slb.com</u>.

Ms. Vitalie Morrison January 24, 2023 Page 3

I look forward to our continued work with you.

Sincerely,

Dawn Greening Remediation Manager on behalf of Cameron International Corporation

- Attachment 1, Texas Risk Reduction Program §350.55 Notifications
- c: Alma L. Jefferson, TCEQ Region 12 Matthew Parish, Taunton, Snyder & Slade Monica Schneider/CH2M HILL Engineers, Inc. David Urann/CH2M HILL Engineers, Inc. John Knott/CH2M HILL Engineers, Inc. Sally Scott/ CH2M HILL Engineers, Inc.

Attachment 1 Texas Risk Reduction Program §350.55 Notifications

ch2mi

CH2M 5995 Rogerdale Road Houston, Texas 77072 972-663-2209

Dariush Ansari Carnarvon Park HOA Inc. 11600 Big John St Houston, Texas 77038-3334

December 15, 2022

Subject: Affected Property Notification TR 2J-2 ABST 871 J Wharton Houston, Texas 77024

Dear Mr. Ansari:

On behalf of Cameron International Corporation (A Schlumberger Company) (Cameron), and in accordance with the Texas Commission on Environmental Quality (TCEQ) Texas Risk Reduction Program (TRRP), CH2M HILL Engineers, Inc. is providing notification of impacted groundwater below your property. There are concentrations of chemicals of concern that may exceed the TCEQ TRRP standards for drinking water, referred to as Groundwater Ingestion Protective Concentration Levels (PCLs), or ^{GW}GW_{Ing} – PCLs.

The groundwater is located 25 to 50 feet below ground surface. Cameron has conducted private well surveys in the area and has found no information to suggest that any homes are supplied with drinking water from the area of affected groundwater. Further, because neighborhood drinking water is provided by the City of Houston from its own reservoirs, residents do not drink the affected groundwater. Cameron has also tested ambient air at ground level to determine whether constituents were traveling upward through the soil. No constituents were detected by those tests.

Please refer to the enclosed factsheet for additional information.

Sincerely,

CH2M HILL Engineers, Inc.

John Knott Project Manager

- Attachment: Former Cameron Iron Works Facility Factsheet
- c: Dawn Greening/Schlumberger Remediation Manager on behalf of Cameron Monica Schneider/CH2M HILL Engineers, Inc.
 Dave Urann/CH2M HILL Engineers, Inc.
 Sally Scott/CH2M HILL Engineers, Inc.

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Facility Environmental Cleanup History

Cooper Industries owned the facility from 1989 to 1994, and began dismantling the facility in the late 1980s. Demolition was completed in 1999. The facility was entered into the Voluntary Cleanup Program (VCP) of the Texas Commission on Environmental Quality (TCEQ) in 1996. As a result, Cameron International Corporation (A Schlumberger Holdings Company) (Cameron; formerly known as Cooper Cameron) has been investigating and remediating the facility in accordance with the requirements of the VCP.

To date, Cameron has investigated soil and groundwater on- and offsite and remediated the facility in accordance with the requirements of the VCP. This includes removing more than 30,000 cubic yards of soil from the facility. Most of the soil at the facility has now been cleaned and meets the cleanup standards for residential use. Groundwater wells were also installed and are being monitored.

In 2001, routine well monitoring to the south of Interstate 10 indicated the presence of certain constituents in the groundwater. The constituents are remnants of industrial solvents used for cleaning parts and equipment. Cameron reported this information to the TCEQ. The TCEQ directed further testing to assess the extent to which such constituents were present in the groundwater. Cameron completed this testing, which confirmed that certain constituents were present in the groundwater under the former facility and extended south under residential areas to near Buffalo Bayou. The types of constituents and their locations can be found in the reports submitted to the TCEQ (<u>https://www.tceq.texas.gov/agency/data/records-services/reqinfo.html</u>). Cameron continues to regularly monitor groundwater.

Since 2003, Cameron has operated a pump-and-treat system at the former facility property to help control the movement of and treat affected groundwater. In 2009, Cameron installed a second pump-and-treat system to help control the movement of constituents along the southern boundary of affected groundwater. Operation of the two pumping systems was discontinued in 2016, with TCEQ concurrence, to evaluate the ability of natural attenuation processes to address the remaining constituents in groundwater. This evaluation will be completed in 2022, and monitoring of the cleanup progress of affected groundwater will continue.

Constituents Found in the Groundwater

Affected Groundwater in Residential Areas

Under the TCEQ's direction, Cameron has assessed the possibility that residents could be exposed to the constituents in groundwater. To date, such assessments have indicated the following:

- The constituents are present in low concentrations. Cameron has tested the groundwater for the presence of the constituents and continues to conduct testing on an annual basis. Although levels exceed drinking water standards, all constituents in groundwater are at levels that the TCEQ considers acceptable for skin contact and inhalation. Further, because neighborhood drinking water is provided by the City of Houston from its own reservoirs, residents do not drink the affected groundwater.
- **Residents are not exposed to the groundwater.** The groundwater is located 25 to 50 feet below ground surface. Cameron has conducted private well surveys in the area and has found no information to suggest that any homes are supplied with drinking water from the area of affected groundwater. Cameron has also tested ambient air at ground level to determine whether constituents were traveling up through the soil. No constituents were detected by those tests.

If a well were completed in the affected water-bearing zone, the levels of constituents in the groundwater are significantly less than the levels considered hazardous by the TCEQ and U.S. Environmental Protection Agency for skin contact or inhalation. Any water from the affected water-bearing zone should not be used for drinking or put to uses inside the household. If you have a water well near the affected groundwater, we would like to know about it. Call or email John Knott (CH2M HILL Engineers, Inc.) at 281-619-8015 or john.knott@jacobs.com.

Soil and Groundwater Cleanup Actions

Cameron has removed more than 30,000 cubic yards of soil at the facility and continues to regularly test the groundwater to monitor constituent concentrations. Cameron intends to clean the affected groundwater so that it will meet standards for residential use.

Cameron has employed two pump-and-treat systems at the facility. These systems were used to control the movement of affected groundwater and extract and treat elevated concentrations. In 2016, both systems were shut down to evaluate the ability of natural processes to address the remaining affected groundwater. Experience indicates that pump-and-treat systems may not be any more effective than allowing the natural processes that are already breaking down the constituents to address the groundwater in a similar period of time.

Cameron has also performed injections of an oxidant (potassium permanganate) into the affected water-bearing zone between 2004 and 2012 to break down the constituents present within the shallow groundwater and enhance groundwater cleanup.

Next Steps

Cameron will continue to monitor the groundwater cleanup process and work in coordination with the TCEQ to ensure that the progress continues.

For More Information

ch2m;

CH2M 5995 Rogerdale Road Houston, Texas 77072 972-663-2209

Silber Hospitality LLC 3 Voss Park Drive Houston, Texas 77024-3125

December 15, 2022

Subject: Affected Property Notification 7625 Katy Freeway Houston, Texas 77024

Dear Sir or Madam:

On behalf of Cameron International Corporation (A Schlumberger Company) (Cameron), and in accordance with the Texas Commission on Environmental Quality (TCEQ) Texas Risk Reduction Program (TRRP), CH2M HILL Engineers, Inc. is providing notification of impacted groundwater below your property. There are concentrations of chemicals of concern that may exceed the TCEQ TRRP standards for drinking water, referred to as Groundwater Ingestion Protective Concentration Levels (PCLs), or ^{GW}GW_{Ing} – PCLs.

The groundwater is located 25 to 50 feet below ground surface. Cameron has conducted private well surveys in the area and has found no information to suggest that any homes are supplied with drinking water from the area of affected groundwater. Further, because neighborhood drinking water is provided by the City of Houston from its own reservoirs, residents do not drink the affected groundwater. Cameron has also tested ambient air at ground level to determine whether constituents were traveling upward through the soil. No constituents were detected by those tests.

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Sincerely,

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John Knott Project Manager

- Attachment: Former Cameron Iron Works Facility Factsheet
- c: Dawn Greening/Schlumberger Remediation Manager on behalf of Cameron Monica Schneider/CH2M HILL Engineers, Inc.
 Dave Urann/CH2M HILL Engineers, Inc.
 Sally Scott/CH2M Hill Engineers, Inc.

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Constituents Found in the Groundwater

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For More Information

CH2M 5995 Rogerdale Road Houston, Texas 77072 972-663-2209

John and Diane Chaney 104 Farish Circle Houston, Texas 77024-2016

January 6, 2023

Subject: Affected Property Notification 104 Farish Circle Houston, Texas 77024

Dear John and Diane Chaney:

On behalf of Cameron International Corporation (A Schlumberger Company) (Cameron), and in accordance with the Texas Commission on Environmental Quality (TCEQ) Texas Risk Reduction Program (TRRP), CH2M HILL Engineers, Inc. is providing notification of impacted groundwater below your property. There are concentrations of chemicals of concern that may exceed the TCEQ TRRP standards for drinking water, referred to as Groundwater Ingestion Protective Concentration Levels (PCLs), or ^{GW}GW_{Ing} – PCLs.

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Knott

John Knott Project Manager

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For More Information

CH2M 5995 Rogerdale Road Houston, Texas 77072 972-663-2209

Current Owner 952 Echo Lane Suite 130 Houston, Texas 77024-2762

January 6, 2023

Subject: Affected Property Notification Lots TR2 and TR31, Bayou Woods Sec 2, and TR 2L ABST 871 J Wharton Houston, Texas 77024

Dear Current Owner:

On behalf of Cameron International Corporation (A Schlumberger Company) (Cameron), and in accordance with the Texas Commission on Environmental Quality (TCEQ) Texas Risk Reduction Program (TRRP), CH2M HILL Engineers, Inc. is providing notification of impacted groundwater below your property. There are concentrations of chemicals of concern that may exceed the TCEQ TRRP standards for drinking water, referred to as Groundwater Ingestion Protective Concentration Levels (PCLs), or ^{GW}GW_{Ing} – PCLs.

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Affected Groundwater in Residential Areas

Under the TCEQ's direction, Cameron has assessed the possibility that residents could be exposed to the constituents in groundwater. To date, such assessments have indicated the following:

- The constituents are present in low concentrations. Cameron has tested the groundwater for the presence of the constituents and continues to conduct testing on an annual basis. Although levels exceed drinking water standards, all constituents in groundwater are at levels that the TCEQ considers acceptable for skin contact and inhalation. Further, because neighborhood drinking water is provided by the City of Houston from its own reservoirs, residents do not drink the affected groundwater.
- **Residents are not exposed to the groundwater.** The groundwater is located 25 to 50 feet below ground surface. Cameron has conducted private well surveys in the area and has found no information to suggest that any homes are supplied with drinking water from the area of affected groundwater. Cameron has also tested ambient air at ground level to determine whether constituents were traveling up through the soil. No constituents were detected by those tests.

If a well were completed in the affected water-bearing zone, the levels of constituents in the groundwater are significantly less than the levels considered hazardous by the TCEQ and U.S. Environmental Protection Agency for skin contact or inhalation. Any water from the affected water-bearing zone should not be used for drinking or put to uses inside the household. If you have a water well near the affected groundwater, we would like to know about it. Call or email John Knott (CH2M HILL Engineers, Inc.) at 281-619-8015 or john.knott@jacobs.com.

Soil and Groundwater Cleanup Actions

Cameron has removed more than 30,000 cubic yards of soil at the facility and continues to regularly test the groundwater to monitor constituent concentrations. Cameron intends to clean the affected groundwater so that it will meet standards for residential use.

Cameron has employed two pump-and-treat systems at the facility. These systems were used to control the movement of affected groundwater and extract and treat elevated concentrations. In 2016, both systems were shut down to evaluate the ability of natural processes to address the remaining affected groundwater. Experience indicates that pump-and-treat systems may not be any more effective than allowing the natural processes that are already breaking down the constituents to address the groundwater in a similar period of time.

Cameron has also performed injections of an oxidant (potassium permanganate) into the affected water-bearing zone between 2004 and 2012 to break down the constituents present within the shallow groundwater and enhance groundwater cleanup.

Next Steps

Cameron will continue to monitor the groundwater cleanup process and work in coordination with the TCEQ to ensure that the progress continues.

For More Information