PBW

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October 17, 2012
(PBW Project No. 1649)

VIA FEDERAL EXPRESS

Mr. Gary Miller
Superfund Division, Region 6 (6SF-RA)
Arkansas/Texas Section
U.S. Environmental Protection Agency
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Ms. Rita Engblom, On-Scene Coordinator
U.S. Environmental Protection Agency, Region 6
Superfund Division (6SF-AP)
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Re: September 2012 Monthly Report for UAO and September 2012 Monthly Report for Settlement Agreement, Gulfco Marine Maintenance Site, Freeport, Texas

Dear Mr. Miller and Ms. Engblom:

Pastor, Behling & Wheeler, LLC (PBW) has prepared this monthly report on behalf of the Respondents LDL Coastal Limited LP (LDL), Chromalloy American Corporation (Chromalloy) and The Dow Chemical Company (Dow) pursuant to Section XII, Paragraph 53 of the amended Unilateral Administrative Order (UAO) and Section VIII, Paragraph 41.a of the Administrative Settlement Agreement and Order on Consent for Removal Action (Settlement Agreement) for the above-referenced Site. Parker Drilling Offshore Corporation is participating in the Site work under an agreement it reached with the above Respondents. As discussed in my telephone conversation with Mr. Miller on August 2, 2005, regarding the UAO, monthly status reports for a given month will be submitted by the 15th of the following month as required in Paragraph 53 of the UAO, rather than by the 10th of the following month as indicated in Appendix 1 of the Statement of Work (SOW) attached to the UAO. The Settlement Agreement requires submittal of a progress report by the 15th of every month.

In accordance with the UAO requirements for the Remedial Investigation/Feasibility Study (RI/FS) this report addresses the topics listed below:

1. Actions which have been taken toward achieving compliance with the UAO during the previous month – No activities were performed during the reporting period as the RI/FS has been completed.

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2. Results of RI/FS sampling, tests, modeling and all other data (including raw data) received or generated by or on behalf of Respondents during the previous month – No new analytical data were received during the previous month.

3. Actions, data and plans which are scheduled for the next two months and other information relating to the progress of RI/FS work – SOW Paragraph 42 requires that the Respondents conduct a presentation to the EPA within 15 calendar days following submission of the Final RI Report. In an April 27, 2011 e-mail, Mr. Miller indicated that such a presentation would not be necessary. The Respondents are awaiting a letter from EPA confirming its waiver of this SOW requirement. On October 19, 2011 Respondents submitted a letter, pursuant to Paragraph 97 of the UAO, certifying that all work and activities required under the UAO have been performed fully in accordance with the UAO. The Respondents are awaiting a letter from EPA indicating its approval of this certification.

4. Information regarding percentage of completion, all delays encountered or anticipated that may affect the future schedule for completion of the work required, and efforts made to mitigate those delays or anticipated delays – RI/FS activities are 100% complete.

In accordance with the Settlement Agreement requirements, this report also addresses the topics listed below for the Removal Action:

1. Significant Removal Action developments during the preceding period, including actions performed and any problems encountered – No activities were performed during the reporting period as all Removal Action activities have now been completed.

2. Removal Action analytical data received during the reporting period – No new analytical data were received during the reporting period.

3. Removal Action developments anticipated during next reporting period, including a schedule of actions to be performed, anticipated problems, and planned resolutions of past or anticipated problems – Respondents have submitted a request for EPA to issue a Notice of Completion of Work pursuant to Paragraph 101 of the Settlement Agreement confirming that all Work has been fully performed in accordance with the Settlement Agreement and that the Settlement Agreement is terminated except for post-removal site controls, if any, payment of Oversight Response Costs; and record retention obligations. The Respondents are awaiting EPA's issuance of the requested Notice of Completion.

Thank you for the opportunity to submit this monthly report. Should you have any questions, please do not hesitate to contact me.

Sincerely,

PASTOR, BEHLING & WHEELER, LLC

Eric F. Pastor, P.E.
Principal Engineer

cc: Mr. Doug McReynolds – EA Engineering, Science and Technology
Ms. Luda Voskov – Texas Commission on Environmental Quality
Mr. Brian Buniva – Sequa Corporation
Mr. John Eldridge – Haynes and Boone, LLP
Mr. Donnie Belote - The Dow Chemical Company
Mr. Ed Menger – Parker Drilling Company
Mr. Allen Daniels - LDL Coastal Limited, LP
Mr. F. William Mahley - Strasburger & Price, LLP
Mr. James C. Morriss III - Thompson & Knight, LLP
Ms. Elizabeth Webb - Thompson & Knight, LLP
Mr. Jay Winters – Golder Associates, Inc.