Comment No.	Section	Page	Paragraph	Comment / Question	Response to Comment-Proposed Revision
GLO-1	1	1	2	Sentence beginning with "The area of investigation…" Please clarify what encompasses "Soil Investigation Area 4". The way it currently reads is confusing as there seems to be discussion in this one sentence about current sampling and past sampling events.	
GLO-2	1.1	3	2 (bullet 1)	Bullet one notes that one sample was collected from the new deeper well (SJMW004D), but doesn't mention the number of samples collected from the other wells installed. Please either state in the text here clearly the number of samples collected from the other well sites, or delete this reference and refer to the number of samples collected at each well and the associated dates in Section 3.	
GLO-3	2.1	6	1	Towards the end of this paragraph it is stated that "although there are some privately owned wells in the upper Chicot Aquifer near USEPA's Preliminary Site Perimeter…" What are these wells used for? It is important to know what the water is being used for from these wells in order to help determine potential transportation of chemicals. Please add this information into the text.	
GLO-4	2.2.2	8	1	Unable to locate *2013 Groundwater Field Sampling Report* as referenced here on the wiki site. It looks like this document was produced at the same time as the Draft RI Report Addendum (November 2013). Since it's not available, please include a table in this section that shows the results of the conventional groundwater quality from each of the wells sampled. Also include the number of samples and dates of these samples from each well.	
GLO-5	2.3.1	9	3	The information that this paragraph is attempting to relay, which is that the surface of the groundwater in deeper well is deeper than that in the shallower well, has nothing to do with the behavior of the groundwater. There is not enough data from the limited sampling conducted in Phase III to draw the conclusion that the groundwater behavior south of the I-10 bridge is the same as what is occurring north of the I-10 bridge. Information presented in the footnote on page 7 (footnote number 5) states that only water level data could be obtained from well SJMW004D. No potentimetric surface map showing the behavior of the groundwater in the deeper well below the Beaumount Clay layer could be produced from the data obtained from this well. Therefore a conclusion about the behavior of groundwater movement is conjuncture and should be removed.	
GLO-6	3.1	11	1	Please include in this discussion that only one discreet sample was collected from each well within the Soil Investigation Area 4. The way this currently reads, it's unclear, and leads the reader to believe that samples were collected from the Phase III wells only.	
GLO-7	3.2	12		Please include a discussion in the text, or at least some text about the higher concentrations of dioxins and other chemicals in 004S well. There is very big difference here in the data between this well and the others from Phase III that is not shown in the text, but buried in the analytical table at the end of the document.	
GLO-8	3.4	13	1	The conclusion that that there is no lateral transport of dioxins and furans in GWBU-A to the aquatic environment is a stretch based on the data provided. First off, there is limited data from this sampling event, which does not provide enough evidence to draw this conclusion (two samples and only one of which is from the shallower groundwater source). Secondly, dioxin and furan concentrations in the groundwater in the deeper well is not expected since the most of the contamination is shown in the fill material above the Beaumount Clay layer. It is fine to state that because of this layer, there is a smaller chance of transfer of surface water and shallow groundwater with potential contaminants to the subsurface aquifers (as stated on page 6, paragraph 1). But, to state that there is no lateral transport pathway is conjuncture. It is assumed that the conditions under which these samples were collected were "normal", meaning that there was little to no soil disturbance and sampling did not occur during a rain event. As stated previously in the document (page 12), dioxin and furan concentrations in groundwater seem to be linked to suspended particulates (turbidity). Therefore, a link can be made between soil disturbance and groundwater quality. Before an overarching statement such as "not lateral transport of dioxins and furans in GWBU-A to the aquatic environment" is made, more investigation needs to be completed, either through continued field work or through literature research.	

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GLO-9	4.2	15	1	Please reference the data behind the statement "surface water flow pathways from the upland of the peninsula south of I-10 toward the Old River were found not to contribute to any potential release of paper mill waste-related dioxins and furans to the aquatic environment, including sediment." Is this a conclusion based on data from previous sampling and modeling events? If so, please reference using an in text citation where this data can be found. If not, please explain how in this Phase III sampling event this conclusion was attained.	
GLO-10	4.2	15	2	Explain the reasoning behind comparing groundwater sample results from Phase II to the exceedances of Texas surface water quality criteria for salt water.	
GLO-11	4.2	16	3	Why was well SJMW004S not used to help determine the transportation of dioxin and furans into the aquatic environment? The exclusion of this well (with the highest concentrations of contaminants) appears to be selective sampling.	
GLO-12	4.3	16	1	Please expound on the statement "under baseline conditions". What are baseline conditions?	
GLO-13	General	General	General	This is a general comment regarding the various statements throughout the document that conclude that there is no transmission to the aquatic environment from the groundwater. The chemistry results show that the more turbid samples (unfiltered) yielded higher concentrations of dioxins than the filtered samples. No sampling has been conducted during a year when aquifers are at capacity, nor when there have been rain events. Since the highest concentration of dioxins in this sampling round came from the shallow well in the GWBU-A, which is characterized by unconfined groundwater (Section 2.2, page 6), there is a concern that transport of COPC between the sediment/GWBU-A and the Bay will occur when groundwater levels are high or during a storm event. In addition, if groundwater is historically low at the moment (due to drought conditions and overuse of the aquifers) (George *et al.*2012), in more normal years, then there may be a possibility that higher groundwater will flow more readily westward across the contaminated area and into an aquatic environment. The evidence put forth to support the claim that there is no pathway for transport to the aquatic environment is limited. There was limited sampling at selected wells in Soil Investigation Area 4. Only one shallow well was sampled once. The well with the highest concentrations of COPC was not investigated for the study on transportation. It is recommended that the conclusion that no pathway exists be modified, or additional research is conducted to bolster this claim.	
GLO-14	General	General	General	Were the comments from the original RI report taken into account when generating this report, or were those comments accepted after this addendum had been drafted?	
GLO-15	General	General	General	Please add brief discussion in the document about environmental conditions while sampling. There is no information in the document on the current status of the groundwater and sampling that is occurring during a prolonged drought. There may be a correlation between the current weather conditions (drought, sampling during a non storm event), and the results.	
GLO-16	Figures	4-1		If there is insufficient data to complete a pathway, it is presumptuous to state that there is an incomplete exposure pathway for some of these linkage; i.e. to state that there an incomplete pathway for exposure from the aquatic environment to birds and people due to storm events moving sediment where high concentrations of dioxins are found when there is scientific literature that shows that dioxins become mobile during storm events into water bodies and can enter the food chain. These designations of "incomplete exposure pathway" should be upgraded.	
GLO-17	Figures	1-2		The red boundary on the map, labeled "Larger of the two approximate boundaries…" -- is this the same delineation as "Soil Investigation Area 4"? If so, can you please label it as such? If not, please add the boundary on this map.	

George, Peter G., PhD, P.G., Robert E. Mace, PhD, P.G., and Rima Petrossian, P.G. Aquifers of Texas. Texas Water Development Board: Report 380. July 2011.