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August 9, 1993

Bob Vocke, Group Leader
Environmental Restoration Program
MS M992
Los Alamos National Laboratory
Los Alamos, New Mexico 87545

Re: **Comments on "Technical Assumptions for Data Collection and Evaluation"**

Dear Mr. Vocke:

The Agreement in Principle (AIP) is providing the following recommendations on the document "Technical Assumptions for Data Collection and Evaluation". It should be noted that the AIP is a non-regulatory program and these comments are provided for your information only.

- 1) We recommend that the wording in item #7 incorporate "EPA-approved" as a modifier to: "fixed analytical laboratory methods..."; and "...detection limit...".
- 2). Referring to item #12, Future land use is an important **issue**, and full stakeholder input is recommended prior to any decisions in this area. The assumption that all land within the present LANL property boundary will be used for industrial purposes could lead to unacceptable risk assessments.
- 3). Referring to item #12, We recommend that ecological risk be considered, in addition to human-health risk, for certain ecologically-sensitive areas such as wetlands and alluvial aquifers.
- 4). Referring to item #12, Vadose-zone transport models may ultimately have merit for the purpose of identifying problem sites on mesa tops, but a final decision on the applicability of modelling at LANL has not been made by the NMED nor the EPA. In some instances, it may be necessary to physically address the potential for subsurface contaminant migration.



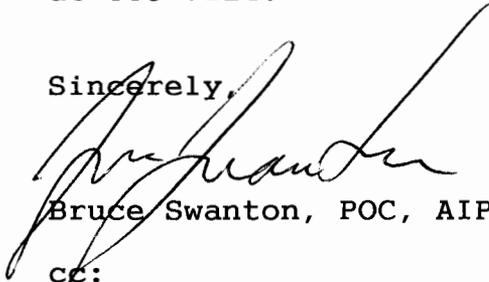
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If you have any questions, please contact Danny Katzman of my staff
at 665-7124.

Sincerely,



Bruce Swanton, POC, AIP/LANL

cc:

Benito Garcia, Chief, HRMB
Neil Weber, Chief, AIP Program
Barbara Hoditschek, Manager, RCRA Permits
Steve Alexander, Manager, RCRA Technical
Diana Webb, LAAO, AIP POC
File, LANL Red 93
File, AIP Program