From: Stephanie Kato <skato@arb.ca.gov>
To: Eric Knight <eknight@energy.state.ca.us>
Date: 5/16/2006 1:13:30 PM
Subject: HRA Comments for Walnut Creek

Eric,

By way of this e-mail, we are informally transmitting ARB's comments on the health risk assessment (HRA) for the Walnut Creek Energy Park. Our review of the December 2005 HRA consisted of evaluating the appropriateness of the health effects values and the methodology for assessing health risks.

Please contact me if you have any questions.

Thank you,
Stephanie

CC: Mike Ringer <mringer@energy.state.ca.us>

COMMENTS FROM STEPHANIE KATO, CA. AIR RESOURCES BOARD, RECEIVED VIA E-MAIL ON 5/16/06.

Walnut Creek Energy Park
Toxic Emissions Health Risk Assessment Review

May 2006

Comments

1) Table 8.9-6 states the construction impacts were adjusted using a factor of 1/70 to adjust the construction cancer health risks. This is inconsistent with the current Office of Environmental Health Hazard Assessment (OEHHA) guidelines. The guidelines in Section 8.2.2 state that to evaluate risk for exposures of less than 9 years it is assumed that average daily dose for short-term exposure lasts for a minimum of 9 years. The adjustment factor used for construction cancer impacts should be 9/70.

2) The report describes the methodology used to estimate maximum cancer risk, and chronic and acute non-cancer hazard indices. Section 8.9.2.4 and Table 8.9-4 show the use of URFs to estimate cancer risk. This is not consistent with current Office of Environmental Health Hazard Assessment (OEHHA) guidelines recommendations or ARB's recommended interim risk management policy (October 9, 2003). The current methodologies indicate that inhalation cancer risk should be estimated using the inhalation dose (mg/kg-day) and the cancer potency factor $(mg/kg\text{-}day)^{-1}$.

3) Review of the modeling files show that the HARP program was used to provide the dispersion modeling and health risks calculations. HARP version 1.0 was used for risk calculations in October 2005 and is not the most current version of HARP. In August 2005, ARB released an update patch to HARP making the current version 1.2a. ARB recommends that the latest version of HARP be used. The current version and update patch are available on ARB's website (*www.arb.ca.gov/toxics/harp/harp.htm*).

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ELECTRONIC PROOF OF SERVICE LIST
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WALNUT CREEK ENERGY PARK
APPLICATION FOR CERTIFICATION
DOCKET NO. 05-AFC-2

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I declare that I transmitted the foregoing document via e-mail, or as indicated by first class postal mail, to the above named on the date indicated thereby. I declare under penalty of perjury that the foregoing is true and correct.

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