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**To:** Robert Worl <rworl@energy.state.ca.us>  
**Date:** 5/16/2006 1:14:49 PM  
**Subject:** HRA Comments on Sun Valley

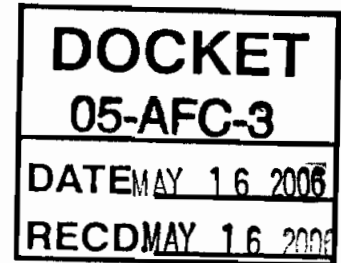
Robert,

By way of this e-mail, we are informally transmitting ARB's comments on the health risk assessment (HRA) for the Sun Valley Energy Project. 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>



Sun Valley Energy Project  
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-day)<sup>-1</sup>.
- 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](http://www.arb.ca.gov/toxics/harp/harp.htm)).