

Southern California Edison
A.23-04-009 – TLRR EPL

DATA REQUEST SET E D - S C E - E P L - D E F 0 0 1

To: Energy Division
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Received Date: 5/19/2023

Response Date: 10/6/2023

Question DD-AQ3-Supp1:

Issue: The PEA states that a Health Risk Assessment is not required for the EPL Project because no new stationary source of air pollutants is included in the EPL Project.

However, according to the CEQA Prefiling Guidance PEA Checklist, “Health Risk Assessment. Complete a Health Risk Assessment when air quality emissions have the potential to lead to human health impacts¹. If health impacts are not anticipated from project emissions, the analysis should clearly describe why emissions would not lead to health impacts.”

And according to Office of Environmental Health Hazard Assessment (OEHHA) most recent guidance for preparation of Health Risk Assessments to determine whether a Health Risk Assessment is required, “Due to the uncertainty in assessing cancer risk from very short-term exposures, we do not recommend assessing cancer risk for projects lasting less than two months at the MEIR. We recommend that exposure from projects longer than 2 months but less than 6 months be assumed to last 6 months (e.g., a 2-month project would be evaluated as if it lasted 6 months).

In Table 5.13-5 the PEA shows that the Project would use staging areas for 180 days, which is equal to approximately 6 months and that the closest residence is 650 feet from the staging area. This would indicate the need for a Health Risk Assessment

How to Address: Conduct and provide a Health Risk Assessment for the staging area or provide additional rationale for why the activities at the staging area do not require a health risk assessment consistent with OEHHA guidance.

Response to Question DD-AQ3-Supp1:

See attached document:

- ED-SCE-EPL-DEF001-AQ3-HRA v1.pdf