Department of Toxic Substances Control

Yana Garcia
Secretary for
Environmental Protection

Katherine M. Butler, MPH, Director
8800 Cal Center Drive
Sacramento, California 95826-3200
dtsc.ca.gov

Gavin Newsom
Governor

SENT VIA ELECTRONIC MAIL

December 9, 2025

Farzaneh Khalaj
Air Quality Specialist
South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, CA 91765
fkhalaj@aqmd.gov

RE: NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE MARATHON LOS ANGELES REFINERY MODERNIZATION PROJECTS DATED NOVEMBER 6, 2025, STATE CLEARINGHOUSE NUMBER 2025110170

Dear Farzaneh Khalaj,

The Department of Toxic Substances Control (DTSC) reviewed the Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) for the Marathon Los Angeles Refinery Modernization Projects (Project). Tesoro Refining & Marketing Company, LLC doing business as Marathon Los Angeles Refinery (Refinery), proposes to modernize its facility, comprised of the Carson Operations and Wilmington Operations, for the purpose of: replacing equipment that is at the end of its useful life by providing asphalt binder to meet market demand, enabling flexibility by making modifications to specific processing units to adjust product yields between transportation fuel products (i.e., gasoline, diesel fuel, and jet fuel), and efficiently produce octane-blending components needed for gasoline supply. Each of these proposed projects are designed to ensure continued safe operations and provide a reliable and affordable supply of transportation fuels to meet the market shift during California's transition to a zero-emission transportation system.

The four proposed projects fulfill different needs at the Refinery, such that any single project can occur without any of the other three projects and have independent utility. However, because each project will have an overlapping construction schedule, the projects are evaluated altogether. The environmental document identifies potentially significant adverse impacts to the environmental topics of air quality and greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality related to water demand during operations, noise during construction, and transportation during construction. This facility is identified on lists compiled by the California Department of Toxics Substances Control per Government Code Section 65962.5. DTSC recommends and requests consideration of the following comments:

1. The proposed Project encompasses multiple active and nonactive mitigation and clean-up sites where DTSC has conducted oversight that may be impacted including, the Former Geon Facility. DTSC requests consideration in regard to ongoing and future groundwater and soil vapor monitoring that may be impacted by the modernization project.
2. If buildings or other structures are to be demolished on any Project sites included in the proposed Project, surveys should be conducted for the presence of lead-based paints or products, mercury, asbestos containing materials, and polychlorinated biphenyl caulk. Removal, demolition, and disposal of any of the above-mentioned chemicals should be conducted in compliance with California environmental regulations and policies. In addition, sampling near current and/or former buildings should be conducted in accordance with DTSC's Preliminary Endangerment Assessment (PEA) Guidance Manual.
3. DTSC recommends all imported soil/fill material be tested to ensure all COCs meet screening levels as outlined in DTSC's PEA Guidance Manual. Furthermore, DTSC advises referencing the DTSC Information Advisory Clean Imported Fill Material Fact Sheet if importing fill is necessary. To minimize the possibility of introducing contaminated soil/fill material there should be documentation of the origins of the soil/fill material and, if

applicable, sampling be conducted to ensure that the imported soil/fill material are suitable for the intended land use. The soil sampling should include analysis based on the source of the soil/fill and knowledge of prior land use.

DTSC would like to thank you for the opportunity to comment on the NOP of a DEIR for the Marathon Los Angeles Refinery Modernization Projects. Thank you for your assistance in protecting California's people and environment from the harmful effects of toxic substances. If you have any questions or would like clarification on DTSC's comments, please respond to this letter or via our CEQA Review email for additional guidance.

Sincerely,

Dave Kereazis

Dave Kereazis
Associate Environmental Planner
HWMP-Permitting Division – CEQA Unit
Department of Toxic Substances Control
Dave.Kereazis@dtsc.ca.gov

cc: (via email)

Governor's Office of Land Use and Climate Innovation
State Clearinghouse
state.clearinghouse@lci.ca.gov

Robin Schott
LASR Environmental Lead / Project Applicant
Tesoro Refining & Marketing LLC
RLSchott@Marathonpetroleum.com

Debbie Bright Stevens
Senior Vice President
Environmental Audit, Inc. / Consulting Firm
dstevens@envaudit.com

Karen Steen
Hazardous Substance Engineer
HWMP - Permitting Division
Department of Toxic Substances Control
Karen.Steen@dtsc.ca.gov

Randy Snapp
Senior Hazardous Substance Engineer
HWMP - Permitting Division
Department of Toxic Substances Control
Randy.Snapp@dtsc.ca.gov

Zephyr Azarian
Hazardous Substance Engineer
HWMP - Permitting Division
Department of Toxic Substances Control
Zephyr.Azarian@dtsc.ca.gov

Mario Cezares
Senior Hazardous Substance Engineer
SMRP – Cleanup - Cypress
Department of Toxic Substances Control
Mario.Cazares@dtsc.ca.gov

Nicholas Ta
Senior Environmental Scientist (Supervisor)
SMRP – Cleanup - Cypress
Department of Toxic Substances Control
Nicholas.Ta@dtsc.ca.gov

Irena Edwards
Environmental Scientist
SMRP – Cleanup - Cypress
Department of Toxic Substances Control
Irena.Edwards@dtsc.ca.gov

Julia Ye
Environmental Scientist
SMRP – Cleanup - Cypress
Department of Toxic Substances Control
Julia.Ye@dtsc.ca.gov

Tamara Purvis
Associate Environmental Planner
HWMP - Permitting Division – CEQA Unit
Department of Toxic Substances Control
Tamara.Purvis@dtsc.ca.gov

Scott Wiley
Associate Governmental Program Analyst
HWMP - Permitting Division – CEQA Unit
Department of Toxic Substances Control
Scott.Wiley@dtsc.ca.gov