

California Department of Transportation

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December 3, 2025

Farzaneh Khalaj
South Coast Air Quality Management District (South Coast AQMD)
21865 Copley Drive
Diamond Bar, CA 91765

RE: Marathon Los Angeles Refinery
Modernization Projects
SCH# 2025110170
GTS# 07-LA-2025-04952

Dear Farzaneh Khalaj,

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above-referenced project. The South Coast Air Quality Management District (South Coast AQMD and Tesoro Refining & Marketing Company, LLC doing business as Marathon Los Angeles Refinery, is proposing to modernize its Marathon Los Angeles Refinery (Refinery), which is comprised of its Carson Operations and Wilmington Operations, for the purpose of: replacing equipment that is at the end of its useful life; 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), depending on market demand; and more efficiently producing octane-blending components needed for gasoline supply. Specifically, Tesoro is proposing modifications to: 1) replace aging coke drums; 2) produce asphalt binder; 3) improve operational performance of the Fluid Feed Hydrodesulfurization Unit which removes sulfur from the gas oil feed before it goes to the Fluidized Catalytic Cracking Unit (FCCU), and 4) improve efficiency to make more high-octane, low vapor pressure clean-gasoline blendstocks by modifying the: a. FCCU which converts heavy hydrocarbons into gasoline and other lighter hydrocarbons, b. alkylation units which convert lighter hydrocarbons into blendstocks for gasoline, and c. the C3 Splitter Unit which separates propane and propylene (compounds containing three carbon molecules) for further processing elsewhere or sold as product. 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 NOP/IS 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.

The nearest State facility is PCH-1, I-405 and I-710. After reviewing the NOP - Notice of Preparation of an EIR), Caltrans has the following comments:

Caltrans recommends limiting large truck travel and construction traffic to off-peak commute hours. A permit for any heavy construction equipment and or materials that require the use of oversized transport vehicles on State highways. If construction traffic is expected to cause issues on any State facilities, please submit a construction traffic control plan detailing potential impacts for Caltrans review.

Should you have any questions, please feel free to contact Nestor Lemus, the project coordinator, at Nestor.Lemus@dot.ca.gov and refer to GTS # 07-LA-2025-04952

Sincerely,



MIYA EDMONSON
LDR/CEQA Branch Chief

cc: State Clearinghouse