



**Yana Garcia**  
Secretary for  
Environmental Protection



**Department of Toxic Substances Control**

Katherine M. Butler, MPH, Director  
8800 Cal Center Drive  
Sacramento, California 95826-3200  
[dtsc.ca.gov](http://dtsc.ca.gov)



**Gavin Newsom**  
Governor

**SENT VIA ELECTRONIC MAIL**

December 15, 2025

Dana Ayers  
Contract Planner  
City of Richmond, Community Development Department  
450 Civic Center Plaza  
Richmond, CA 94804  
[dayers@migcom.com](mailto:dayers@migcom.com)

RE: MITIGATED NEGATIVE DECLARATION FOR THE RICHMOND TERMINAL RAIL  
EXPANSION AND TRUCK RACK IMPROVEMENTS PROJECT DATED NOVEMBER  
14, 2025, STATE CLEARINGHOUSE NUMBER [2025110596](#)

Dear Dana Ayers,

The Department of Toxic Substances Control (DTSC) reviewed the Mitigated Negative Declaration (MND) for the Richmond Terminal Rail Expansion and Truck Rack Improvements Project (Project). The TransMontaigne Operating Company proposes the expansion of rail service at the terminal in the location of the existing rail line, requiring construction of new track and associated rail infrastructure, along with the relocation and consolidation of the existing truck racks (each rack is currently two bays) into one combined four-bay truck rack. By providing increased rail capacity and a new truck rack built to current standards, the proposed Project would not significantly change the existing uses on-site but would allow the terminal to offload, store, and distribute greater quantities of petroleum-based products and renewable feedstocks by ship and by truck. 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. Section 4.9 Hazards and Hazardous Materials of the environmental document does not identify that the [United Heckathorn Co. Superfund site](#) is located immediately west of the proposed improvements Project. Pesticide contamination is present on the site and in Lauritzen Channel. It is recommended that this site be discussed in the Initial Study / MND. Additional information regarding this site is available on [EnviroStor](#).

2. As soil and groundwater contamination are present at the Project site, DTSC recommends the preparation of a soil and groundwater management plan to provide procedures for handling and managing contaminated soil and groundwater, procedures for managing unanticipated contamination or subsurface features, and mitigation measures for potential dust generation and tracking of contamination offsite. As the Project site is under the San Francisco Bay Regional Water Quality Control Board's oversight, a soil and groundwater management plan should be provided to the Water Board for review and approval.
3. If buildings, asphalt, 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](#).
4. DTSC recommends all imported soil/fill material be tested to ensure all contaminants of concern 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 MND for the Richmond Terminal Rail Expansion and Truck Rack Improvements Project. 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,

A handwritten signature in cursive script that reads "Tamara Purvis".

Tamara Purvis  
Associate Environmental Planner  
HWMP - Permitting Division – CEQA Unit  
Department of Toxic Substances Control  
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cc: (via email)

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