



**Yana Garcia**  
Secretary for  
Environmental Protection



## Department of Toxic Substances Control

Meredith Williams, Ph.D., Director  
8800 Cal Center Drive  
Sacramento, California 95826-3200



**Gavin Newsom**  
Governor

### SENT VIA ELECTRONIC MAIL

December 8, 2023

Governor's Office of Planning & Research

Celia Sanchez Zelaya  
Planning Assistant – CEQA  
Los Angeles Harbor Department  
425 South Palos Verdes Street  
San Pedro, CA 90731  
[CSanchezZelaya@portla.org](mailto:CSanchezZelaya@portla.org)

**Dec 08 2023**

**STATE CLEARINGHOUSE**

RE: DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR) FOR THE BERTH 191-194 (ECOCEM) LOW-CARBON CEMENT PROCESSING PROJECT DATED OCTOBER 12, 2023 STATE CLEARINGHOUSE # [2022030294](#)

Dear Celia Sanchez Zelaya:

The Department of Toxic Substances Control (DTSC) received a Draft Environmental Impact Report (DEIR) for the Berths 191-194 (Ecocem) Low-Carbon Cement Processing Facility Project (Project). The proposed Project is located at 100 Yacht Street, Wilmington, CA 90744. The proposed Project involves the construction and operation of a new processing facility on the backlands adjacent to Berths 192-194 that would import raw materials by ship and truck, temporarily store and process them to produce a low-carbon binder (an alternative to Portland cement) and load third-party trucks that would transport the product to local consumers. The proposed Project would receive one of the raw materials from overseas by dry bulk cargo vessels operating at Berth 191. Based on our Project review, DTSC requests consideration of the

following comments.

1. Based on the figures included in the DEIR, the proposed Project may affect and in turn may be affected by the historical contamination by the [Gibson Environmental and Wilmington Liquid Bulk Terminal](#). The Gibson Environmental Inc. (Gibson) operation is an area within the Wilmington Bulk Liquid Terminals, located in Wilmington, CA. Gibson operated a liquid waste recycling facility from 1990 to 1994. The facility is undergoing RCRA closure. The project is in the closure certification review process now.

Further information on the [Gibson Environmental and Wilmington Liquid Bulk Terminal](#) site can be found on EnviroStor. The Site's potential contaminants of concern (COCs) are Total Petroleum Hydrocarbons (TPH) -Jet Fuel, Motor Oil., Stoddard Solvent, Diesel, and Gas.

The Project has a [Corrective Action Consent Agreement](#) (Consent Agreement) and you must follow all orders and restrictions of the consent agreement.

2. The Project and future CEQA documents should acknowledge the potential for historic or future activities on or near the Project site to result in the release of hazardous wastes/substances on the Project site. In instances in which releases have occurred or may occur, further studies should be carried out to delineate the nature and extent of the contamination, and the potential threat to public health and/or the environment should be evaluated.
3. DTSC recommends that all imported soil and fill material should be tested to ensure any contaminants of concern are within approved screening levels for the intended land use. To minimize the possibility of introducing contaminated soil and fill material there should be documentation of the origins of the soil or fill material and, if applicable, sampling be conducted to ensure that the imported soil and fill material

Celia Sanchez Zelaya

December 8, 2023

Page 3

meets screening levels for the intended land use. The soil sampling should include analysis based on the source of the fill and knowledge of the prior land use.

DTSC appreciates the opportunity to comment on the Berth 191-194 (Ecocem) Low-Carbon Cement Processing 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 any clarification on DTSC's comments, please respond to this letter or via [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

Celia Sanchez Zelaya

December 8, 2023

Page 4

cc: (via email)

Governor's Office of Planning and  
Research State Clearinghouse

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Mr. Dave Kereazis

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