



Central Coast Regional Water Quality Control Board

May 20, 2026

Ronald George
Plant Manager
Moss Landing Power Company, LLC
7301 North State Highway 1
Moss Landing, CA 95039
Email: ronald.george@vistracorp.com

Via Electronic and Certified Mail
7020 1810 0002 0768 7584

Dear Ronald George:

ENFORCEMENT PROGRAM: MOSS LANDING POWER COMPANY LLC POWER PLANT, HIGHWAY 1 & DOLAN ROAD, MONTEREY COUNTY, WDD 3 272011001 – EXPEDITED PAYMENT PROGRAM – CONDITIONAL SETTLEMENT OFFER TO RESOLVE ALLEGED PERMIT VIOLATIONS THROUGH ADMINISTRATIVE CIVIL LIABILITY ORDER R3-2026-0037

The California Regional Water Quality Control Board, Central Coast Region (Central Coast Water Board) is a state regulatory agency with the responsibility for protecting the quality of the waters of the state within its area of jurisdiction. The Central Coast Water Board has authority to require submission of information, direct action, establish regulations, levy penalties, and bring legal action when necessary to protect water quality. The purpose of this letter is to notify the Moss Landing Power Company LLC (Discharger) of alleged violations of Waste Discharge Requirements (WDR) Order R3-2020-0031, National Pollutant Discharge Elimination System Permit (NPDES) CA0006254, subject to mandatory minimum penalties, and of the opportunity to participate in an expedited settlement process to address \$90,000 (Penalty Amount) in liability.

PLEASE NOTE: NO PAYMENT IS YET DUE IN RESPONSE TO THIS LETTER

ALLEGED VIOLATIONS

The Central Coast Water Board's Assistant Executive Officer alleges that from February 28, 2022, to February 14, 2025, the Discharger violated the effluent limitations and/or late reporting requirements identified in the notice of violation (NOV) attached to the enclosed Acceptance of Conditional Settlement Offer and Waiver of Right to Hearing (Acceptance and Waiver); Administrative Civil Liability Order R3-2026-0037 (ACL Order) for discharges to Moss Landing Harbor and the Pacific Ocean.

JANE GRAY, CHAIR | RYAN E. LODGE, EXECUTIVE OFFICER

STATUTORY LIABILITY

California Water Code sections 13385, subdivisions (h) and (i) and 13385.1, require the assessment of a mandatory minimum penalty of \$3,000 for specified serious and non-serious effluent limitation and/or late reporting violations. The enforcement action that the Central Coast Water Board uses to assess such liability is an administrative civil liability complaint, followed by a public hearing on the matter. The Central Coast Water Board is required to, at a minimum, assess the mandatory minimum penalties. Alternatively, the Central Coast Water Board has the option to assess higher discretionary administrative civil liabilities, beginning with the date on which the violations first occurred. Discretionary administrative civil liabilities may be assessed up to \$10,000 for each day in which the violation occurs, plus \$10 for each gallon discharged but not cleaned up in excess of 1,000 gallons. The Central Coast Water Board also has the option to refer such matters to the Attorney General's Office for prosecution. If referred to the Attorney General's Office for prosecution, the Superior Court may assess up to \$25,000 for each day in which the violation occurs, and \$25 for each gallon discharged but not cleaned up in excess of 1,000 gallons.

The Central Coast Water Board Executive Officer is being provided a copy of this cover letter without attachments for informational purposes only. If you accept the conditional settlement offer and therefore agree to enter into settlement negotiations with the Assistant Executive Officer and its Prosecution Team, any settlement negotiations would be conducted confidentially in accordance with California Evidence Code sections 1152 and 1154.

CONDITIONAL SETTLEMENT OFFER

To avoid the issuance of an administrative civil liability complaint and promote expedited resolution of the alleged violations, the Central Coast Water Board Assistant Executive Officer offers the Discharger an opportunity to participate in the expedited payment program to settle the matter by completing and returning the enclosed Acceptance and Waiver. Details of the Conditional Settlement Offer are described in this letter and in the Acceptance and Waiver. If the Discharger accepts this offer, the Central Coast Water Board Assistant Executive Officer will forego issuance of an administrative civil liability complaint, will not refer the violations to the Attorney General's Office, will not charge incurred staff costs, and will not seek discretionary administrative civil liabilities for the alleged violations identified in the NOV.

DISCHARGER'S OPTIONS FOR RESPONSE TO CONDITIONAL SETTLEMENT OFFER

The Discharger's options for responding to the Conditional Settlement Offer are the following:

1. **Accept the Conditional Settlement Offer**: If the Discharger accepts the Conditional Settlement Offer, the Discharger must complete and return the enclosed Acceptance and Waiver **no later than June 19, 2026**. The Acceptance and Waiver document provides more details regarding the conditions of the settlement and payment option(s) for the Penalty Amount. *Note: No payment is*

due at the time the Discharger returns the signed Acceptance and Waiver to the Central Coast Water Board.

2. **Contest Alleged Violations:** If the Discharger chooses to contest any of the violations alleged in the NOV attached to the Acceptance and Waiver, the Discharger must identify each violation and the basis for its challenge (e.g., factual error, affirmative defense) **on or before June 19, 2026**. Central Coast Water Board staff will evaluate the contested violations and take one of the following actions:
 - a. If Central Coast Water Board staff determine the alleged violations are not supported, it will expunge or exempt those violations, take no further action against the Discharger for those violations, and notify the Discharger in writing of that determination. For any remaining violations, the Discharger will be given 30 days from the date of receipt of Central Coast Water Board staff's determination to either accept the Conditional Settlement Offer by completing and returning the Acceptance and Waiver to the Central Coast Water Board, or to reject the Conditional Settlement Offer; or
 - b. If Central Coast Water Board staff determine the alleged violations are valid, staff will notify the Discharger of that determination. The Discharger will be given 30 days from the date of receipt of Central Coast Water Board staff's determination to either accept the Conditional Settlement Offer by completing and returning the Acceptance and Waiver to the Central Coast Water Board, or to reject the Conditional Settlement Offer.
3. **Reject the Conditional Settlement Offer:** If the Discharger does not respond **by June 19, 2026**, or rejects the Conditional Settlement Offer, the Central Coast Water Board Assistant Executive Officer may issue an administrative civil liability complaint for any unresolved alleged violations. In an administrative civil liability complaint, the liability amount sought and/or imposed may exceed the liability amount in the Conditional Settlement Offer.

CONTACT PERSONS

Should the Discharger have any questions about the NOV, the Conditional Settlement Offer, Acceptance and Waiver, the ACL Order, or expedited payment program process, please contact Kelsey DeLong at kelsey.delong@waterboards.ca.gov or (805) 594-6182, or Sarah Crable at sarah.crable@waterboards.ca.gov or (805) 549-3706.

Sincerely,

*Original Signed by Angela Schroeter
On May 20, 2026*

Angela V. Schroeter
Assistant Executive Officer

Enclosure: Acceptance of Conditional Settlement Offer and Waiver of Right to Hearing;
Administrative Civil Liability Order R3-2026-0037

cc via email:

Moss Landing Power Company, LLC:

Laura Dale
Environmental Health and Safety Manager
Moss Landing Power Plant
laura.dale@vistracorp.com

Central Coast Water Board:

Angela Schroeter, angela.schroeter@waterboards.ca.gov
Kelsey DeLong, kelsey.delong@waterboards.ca.gov
Tamara Anderson, tamara.anderson@waterboards.ca.gov
Sarah Crable, sarah.crable@waterboards.ca.gov
Todd Stanley, todd.stanley@waterboards.ca.gov

File Location: R:\RB3\Enforcement\EPLs\2026-0037 Moss Landing PP\Moss Landing MMP EPL 26-0037 Offer.docx

ECM Primary Indexing # 220809

**ACCEPTANCE OF CONDITIONAL SETTLEMENT OFFER
AND WAIVER OF RIGHT TO HEARING;**

ADMINISTRATIVE CIVIL LIABILITY ORDER R3-2026-0037

Moss Landing Power Company, LLC (Discharger)
Moss Landing Power Plant
Highway 1 and Dolan Road
Monterey County
Waste Discharge Requirements Order R3-2020-0031
National Pollutant Discharge Elimination System (NPDES) Permit CA0006254
WDID: 3 272011001

By signing below and returning this Acceptance of Conditional Settlement Offer and Waiver of Right to Hearing (Acceptance and Waiver) to the California Regional Water Quality Control Board, Central Coast Region (Central Coast Water Board), the Discharger hereby accepts the Conditional Settlement Offer from the Assistant Executive Officer to participate in the expedited payment program to settle the alleged violations and waives the right to a hearing before the Central Coast Water Board to dispute the alleged violations. The alleged violations are identified in the attached notice of violation (NOV).

The Discharger agrees that the NOV shall serve as a complaint pursuant to Division 7, Chapter 5, Article 2.5 of the California Water Code and that no separate complaint is required for the Central Coast Water Board to assert jurisdiction over the alleged violations. The Discharger agrees to pay the mandatory minimum penalties (Penalty Amount) authorized by California Water Code sections 13385 and 13385.1, as specified in the NOV, which shall be deemed payment in full of any civil liability pursuant to Water Code sections 13385 and 13385.1 that otherwise might be assessed for the violations described in the NOV. The Discharger understands that by signing this Acceptance and Waiver, the Discharger waives its right to contest the allegations in the NOV and the amount of administrative civil liability for such violations.

The Discharger understands that this Acceptance and Waiver does not address or resolve liability for any violation that is not specifically identified in the NOV.

The Discharger understands that federal regulations set forth in title 40, Code of Federal Regulations, section 123.27(d)(2)(iii) require the Central Coast Water Board to publish notice of and provide at least 30 days for public comment on any proposed resolution of an enforcement action addressing NPDES permit violations. Accordingly, Central Coast Water Board staff will publish this Acceptance and Waiver for public comment.

If no public comments or new material facts are received within the public comment period that cause the Central Coast Water Board Assistant Executive Officer to reconsider the proposed Conditional Settlement Offer, the Executive Officer, through its delegated authority by the Central Coast Water Board, will consider execution of the Acceptance and Waiver as the executed Administrative Civil Liability Order R3-2026-0037 (ACL Order) that resolves the alleged violations identified in the NOV.

Acceptance of Conditional Settlement Offer and Waiver of Right to Hearing;
Administrative Civil Liability Order R3-2026-0037

If significant public comments are received in opposition to the Acceptance and Waiver and/or new material facts become available that are relevant to the Acceptance and Waiver, the Central Coast Water Board Assistant Executive Officer may withdraw the Conditional Settlement Offer. In that circumstance, the Central Coast Water Board Assistant Executive Officer may issue a revised Conditional Settlement Offer or may issue an administrative civil liability complaint and the matter would be set for a hearing before the Central Coast Water Board. For such a civil liability hearing, the Discharger understands that this Acceptance and Waiver executed by the Discharger will not be used as evidence against the Discharger.

Penalty Amount: \$90,000

The Discharger must pay the total Penalty Amount to the State Water Pollution Cleanup and Abatement Account.¹

Upon signature by the Discharger, the Discharger must return this Acceptance and Waiver in pdf format via email or mail to:

Kelsey DeLong
Enforcement Coordinator
Email: kelsey.delong@waterboards.ca.gov
Central Coast Water Board
895 Aerovista Place, Suite 101
San Luis Obispo, CA 93401

The Discharger understands that no payments are due at the time it returns the signed Acceptance and Waiver form to the Central Coast Water Board. After the required public comment period and execution of the Acceptance and Waiver as the executed ACL Order by the Executive Officer, the Central Coast Water Board will transmit the executed ACL Order to the Discharger. The transmittal letter will include payment due dates and payment instructions based on the payment options selected in the Acceptance and Waiver. The full payment of the Penalty Amount shall be due within 30 calendar days of the executed ACL Order. Furthermore, the Discharger understands that full payment within 30 calendar days of the executed ACL Order is a material condition of this Acceptance and Waiver. Failure to pay the Penalty Amount within the required time period may subject the Discharger to further liability.

¹ Cleanup and Abatement Account:
https://www.waterboards.ca.gov/water_issues/programs/grants_loans/cleanup_and_abatement.html

Acceptance of Conditional Settlement Offer and Waiver of Right to Hearing;
Administrative Civil Liability Order R3-2026-0037

IT IS SO STIPULATED.

I hereby affirm that I am duly authorized to act on behalf of and to bind the Discharger in the making and giving of this Acceptance and Waiver.

By: _____ (Signed Name) _____ (Date)

(Printed or Typed Name)

(Email)

(Title)

Acceptance of Conditional Settlement Offer and Waiver of Right to Hearing;
Administrative Civil Liability Order R3-2026-0037

IT IS HEREBY ORDERED pursuant to Water Code section 13323 and Government Code section 11415.60 on behalf of the California Regional Water Quality Control Board, Central Coast Region that ACL Order R3-2026-0037 is hereby adopted.

By: _____
Ryan E. Lodge
Executive Officer
Central Coast Water Board

Attachment: Notice of Violation

File Location: R:\RB3\Enforcement\EPLs\2026-0037 Moss Landing PP\Moss Landing MMP EPL 26-0037 Waiver.docx

ECM Primary Indexing # 220809

Exhibit A – Notice of Violation
Moss Landing Power Company, Moss Landing Power Plant
Mandatory Minimum Penalty Violations Requiring Enforcement
Alleged Violation Dates: February 28, 2022 – February 14, 2025

The enforcement staff of the California Regional Water Quality Control Board, Central Coast Region (Central Coast Water Board) reviewed information submitted by this facility to determine whether the discharger is subject to mandatory minimum penalties (MMPs) pursuant to subdivisions (h) and (i) of California Water Code section 13385 and section 13385.1. The following table or tables list this facility's alleged violations of Waste Discharge Requirements Order R3-2020-0031, National Pollutant Discharge Elimination System Permit CA0006254 from February 28, 2022, to February 14, 2025, for which the Central Coast Water Board has not yet assessed MMPs. Final calculation of MMP amounts and definitions of some of the terms used in this document are listed below the table.

For additional information about the alleged violations listed in the table, please refer to [the State Water Resources Control Board CIWQS Public Reports webpage](#) and select the "Mandatory Minimum Penalty (MMP) Report" link located under the "Violations Reports" category. Once in the Mandatory Minimum Penalty Reports search page, select Region 3 along with the beginning and ending dates shown in this exhibit, select Run Report, and then select your facility to access the list of violations. Expand the "Effluent MMP Violations" and/or "Late Report MMP Violations" sections of that page by selecting the "+" icon to the left of the section titles. To view details of a violation, select the "Violation ID" number. For chronic (non-serious) effluent violations, select the "Chronic" link in the "MMP Type" column of the "Effluent Limit Violations" section to see a list of the three or more violations preceding each chronic violation within 180 days and thus qualifying the chronic violation as an MMP.

Effluent MMP Violations Table

#	Violation Number	Violation Date	Pollutant	Pollutant Type	Limit Period	Limit	Result	Units	% Over Limit	S or C for <u>Serious</u> or <u>Chronic</u> (Non-Serious) Violation	Date 180 Days Prior	Number of Violations within 180 days	Mandatory Minimum Penalty
1	1136576	2/28/22	Total Suspended Solids**	Group 1	Monthly Average	30	38	mg/L	27	C	9/1/21	4	\$ 3,000
2	1134906	5/18/22	Total Suspended Solids**	Group 1	Maximum Daily	100	286	mg/L	186	S	11/19/21	N/A	\$ 3,000
3	1136577	5/31/22	Total Suspended Solids**	Group 1	Monthly Average	30	286	mg/L	853	S	12/2/21	N/A	\$ 3,000
4	1134905	6/8/22	Total Suspended Solids**	Group 1	Maximum Daily	100	121	mg/L	21	C	12/10/21	7	\$ 3,000
5	1136578	6/30/22	Total Suspended Solids**	Group 1	Monthly Average	30	121	mg/L	303	S	1/1/22	N/A	\$ 3,000
6	1134908	7/31/22	Total Suspended Solids**	Group 1	Monthly Average	30	36	mg/L	20	C	2/1/22	6	\$ 3,000

EPL R3-2026-0037 – Exhibit A
 ACL Order R3-2026-0037
 Moss Landing Power Company, Moss Landing Power Plant

#	Violation Number	Violation Date	Pollutant	Pollutant Type	Limit Period	Limit	Result	Units	% Over Limit	S or C for <u>S</u> erious or <u>C</u> hronic (Non-Serious) Violation	Date 180 Days Prior	Number of Violations within 180 days	Mandatory Minimum Penalty
7	1134811	7/31/22	Poly-chlorinated Biphenyls	Group 2	30-Day Average	0	195.8	pg/L	N/A*	S	2/1/22	N/A	\$ 3,000
8	1134907	9/30/22	Total Suspended Solids**	Group 1	Monthly Average	30	83	mg/L	177	S	4/3/22	N/A	\$ 3,000
9	1134913	10/10/22	Cyanide, Total (as CN)	Group 2	6-Month Median	8.4	12.1	ug/L	44	S	4/13/22	N/A	\$ 3,000
10	1134911	12/30/22	pH	Other	Instantaneous	9	9.2	SU	N/A	C	7/3/22	5	\$ 3,000
11	1134430	6/6/23	pH	Other	Instantaneous	9	9.2	SU	N/A	C	12/8/22	4	\$ 3,000
12	1134792	6/26/23	Total Suspended Solids**	Group 1	Daily Maximum	100	173	mg/L	73	S	12/28/22	N/A	\$ 3,000
13	1134768	6/30/23	Total Suspended Solids**	Group 1	Monthly Average	30	173	mg/L	477	S	1/1/23	N/A	\$ 3,000

EPL R3-2026-0037 – Exhibit A
 ACL Order R3-2026-0037
 Moss Landing Power Company, Moss Landing Power Plant

#	Violation Number	Violation Date	Pollutant	Pollutant Type	Limit Period	Limit	Result	Units	% Over Limit	S or C for <u>S</u> erious or <u>C</u> hronic (Non-Serious) Violation	Date 180 Days Prior	Number of Violations within 180 days	Mandatory Minimum Penalty
14	1137081	7/31/23	Poly-chlorinated Biphenyls	Group 2	30-Day Average	0	135.3	pg/L	N/A*	S	2/1/23	N/A	\$ 3,000
15	1134914	8/14/23	Total Suspended Solids**	Group 1	Daily Maximum	100	120	mg/L	20	C	2/15/23	7	\$ 3,000
16	1134915	8/31/23	Total Suspended Solids**	Group 1	Monthly Average	30	120	mg/L	300	S	3/4/23	N/A	\$ 3,000
17	1136541	8/31/23	Total Suspended Solids**	Group 1	Monthly Average	138	266	lb/day	93	S	3/4/23	N/A	\$ 3,000
18	1134916	11/21/23	pH	Other	Instantaneous	9	9.1	SU	N/A	C	5/25/23	8	\$ 3,000
19	1134917	11/30/23	Oil and Grease	Group 1	Monthly Average	15	16	mg/L	7	C	6/3/23	9	\$ 3,000
20	1137022	12/31/23	Total Suspended Solids**	Group 1	Monthly Average	30	31	mg/L	3	C	7/4/23	7	\$ 3,000

EPL R3-2026-0037 – Exhibit A
 ACL Order R3-2026-0037
 Moss Landing Power Company, Moss Landing Power Plant

#	Violation Number	Violation Date	Pollutant	Pollutant Type	Limit Period	Limit	Result	Units	% Over Limit	S or C for <u>Serious</u> or <u>Chronic</u> (Non-Serious) Violation	Date 180 Days Prior	Number of Violations within 180 days	Mandatory Minimum Penalty
21	1136530	1/11/24	pH	Other	Instantaneous	9	9.5	SU	N/A	C	7/15/23	8	\$ 3,000
22	1137023	5/31/24	Total Suspended Solids**	Group 1	Monthly Average	30	46	mg/L	53	S	12/3/23	N/A	\$ 3,000
23	1136574	6/30/24	Total Suspended Solids**	Group 1	Monthly Average	30	70	mg/L	133	S	1/2/24	N/A	\$ 3,000
24	1135131	9/24/24	Total Suspended Solids**	Group 1	Daily Maximum	100	393	mg/L	293	S	3/28/24	N/A	\$ 3,000
25	1135130	9/30/24	Total Suspended Solids**	Group 1	Monthly Average	30	196	mg/L	553	S	4/3/24	N/A	\$ 3,000
26	1135129	9/30/24	Total Suspended Solids**	Group 1	Monthly Average	138	352	lb/day	155	S	4/3/24	N/A	\$ 3,000
27	1139635	10/31/24	Oil and Grease	Group 1	Monthly Average	15	17	mg/L	13	C	5/4/24	6	\$ 3,000

EPL R3-2026-0037 – Exhibit A
 ACL Order R3-2026-0037
 Moss Landing Power Company, Moss Landing Power Plant

#	Violation Number	Violation Date	Pollutant	Pollutant Type	Limit Period	Limit	Result	Units	% Over Limit	S or C for <u>Serious</u> or <u>Chronic</u> (Non-Serious) Violation	Date 180 Days Prior	Number of Violations within 180 days	Mandatory Minimum Penalty
28	1139634	10/31/24	Total Suspended Solids**	Group 1	Monthly Average	30	64	mg/L	113	S	5/4/24	N/A	\$ 3,000
29	1142926	1/31/25	Total Suspended Solids**	Group 1	Monthly Average	30	44	mg/L	47	S	8/4/24	N/A	\$ 3,000
30	1142917	2/14/25	Temperature	Other	Instantaneous	26	27.2	Deg F	N/A	C	8/18/24	7	\$ 3,000

Total Penalty for Effluent Violations: \$90,000

* Where an effluent limitation is zero, any reported detection necessarily exceeds the effluent limitation by more than 40 percent for Group 1 pollutant types or by more than 20 percent for Group 2 pollutant types and therefore warrants determination as a serious violation for mandatory minimum penalty purposes.

** Waste Discharge Requirements Order R3-2020-0031, Monitoring and Reporting Program Effluent Monitoring Requirement IV.B.1, Table E-4, Footnote [2], and Effluent Monitoring Requirement IV.C.1, Table E-5, Footnote [1] state, “When suspended solids analysis...indicate noncompliance may be due to intake water quality, concurrent intake samples shall be collected to verify such is the case”. Therefore, Central Coast Water Board staff subtracted influent total suspended solids concentrations from the concurrent effluent concentrations to calculate the net discharge concentration to determine compliance and evaluate the applicability of mandatory minimum penalties.

EPL R3-2026-0037 – Exhibit A
ACL Order R3-2026-0037
Moss Landing Power Company, Moss Landing Power Plant

Calculation of Total Mandatory Minimum Penalty Amount for Effluent Violations:
(18 Serious Violations + 12 Non-Serious Violations) × \$3,000 = \$90,000

For Group 1 pollutants, a violation is serious when the limit is exceeded by 40% or more, and non-serious when the limit is exceeded by less than 40%. “Non-serious” is also referred to as “chronic” in CIWQS, indicating violations are occurring too frequently.

For Group 2 pollutants, a violation is serious when the limit is exceeded by 20% or more, and non-serious when the limit is exceeded by less than 20%. “Non-serious” is also referred to as “chronic” in CIWQS, indicating violations are occurring too frequently.

For “Other” pollutants (i.e., pollutants other than Groups 1 or 2), a violation is non-serious when the limit is exceeded by any amount. “Non-serious” is also referred to as “chronic” in CIWQS, indicating violations are occurring too frequently. For the purposes of MMP enforcement, “Other” pollutant violations are not categorized as serious.

Each serious violation is subject to a mandatory minimum penalty of \$3,000.

A non-serious (also known as chronic) violation is subject to a mandatory minimum penalty of \$3,000 when it is preceded by three chronic or serious violations (or more) in a 180-day period representing six consecutive months (e.g., period commencing on the date of the violation being evaluated and ending 180 days before that date). The three most recent preceding chronic or serious violations within the 180-day period that are counted first toward qualifying a chronic violation for a mandatory minimum penalty are not penalized within that specific determination.

For example, if a violation named V4 is preceded by three violations V1, V2, and V3 within a 180-day period, V4 is determined to be subject to a mandatory minimum penalty of \$3,000. Within that specific determination for violation V4, V1 through V3 are counted but not penalized. However, each violation is subject to its own specific determination. So, V1, V2, and V3 are each subject to their own evaluation based on their specific occurrence dates and applicable 180-day periods and may warrant or have warranted in a previous enforcement action their own penalty as a chronic or serious violation.

Accordingly, all violations indicating “C” for “Chronic” in the above table also show four or more violations within 180 days because each of the chronic violations is preceded by three (or more) violations in that period. Please see the instructions

EPL R3-2026-0037 – Exhibit A
 ACL Order R3-2026-0037
 Moss Landing Power Company, Moss Landing Power Plant

on the first page of this exhibit if you would like to view in CIWQS all of the preceding violations applicable to the above chronic violations.

Term	Definition
Units	SU = standard units of pH pg/L = picograms per liter mg/L = milligrams per liter ug/L = micrograms per liter lb/day = pounds per day Deg F = degrees Fahrenheit
N/A	Not Applicable
CIWQS	California Integrated Water Quality System database used by the Water Boards to manage violation and enforcement activities, as well as other data types relevant to water quality protection.
Violation Number	Identification number assigned to a violation in CIWQS.
Violation Date	Date that a violation occurred, with the exception that for some violation types, such as a monthly average, the last day of the reporting period is used. If the occurrence date is unknown, the date used is the day the violation was first discovered by staff, the Discharger, or a third party.
Pollutant Types: Group 1 & 2	Groups of pollutants defined in the State Water Resources Control Board Water Quality Enforcement Policy. Also referred to as Category 1 or CAT1 and Category 2 or CAT2, respectively.
Pollutant Type: Other	"Other" refers to "Other Effluent Violation". Group of pollutants other than those included in Group 1 or 2.

File Location: R:\RB3\Enforcement\EPLs\2026-0037 Moss Landing PP\Moss Landing MMP EPL Offer 26-0037 Exh A-NOV.docx

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