CENTRAL COAST REGIONAL WATER QUALITY CONTROL BOARD

July 22, 2026

Nicki Fowler
Health Program Coordinator
Health Department, Environmental Health Bureau
County of Monterey
1270 Natividad Road, 1st Floor
Salinas, CA 93906
Email: fowlerne@countyofmonterey.gov

via Electronic Mail

SUBJECT: COMMENTS ON JUNE 22, 2026, CHARACTERIZATION AND SCREENING-LEVEL RISK EVALUATION REPORT

SITE: MOSS LANDING ENERGY STORAGE FACILITY, VISTRA CORPORATION BATTERY AND ELECTRONICS FIRE (SITE CLEANUP PROGRAM)

Dear Nicki Fowler:

On June 23, 2026, the Monterey County Environmental Health Bureau (EHB) requested that State partners, including the California Regional Water Quality Control Board, Central Coast Region (Central Coast Water Board), review and provide comments on Characterization and Screening-Level Risk Evaluation Report (PEA Report Equivalent) dated June 22, 2026, and prepared by Terraphase Engineering Inc. (Terraphase) for Vistra Corporation (Vistra). Central Coast Water Board staff reviewed a preliminary draft of the PEA Report Equivalent (Draft PEA) dated February 27, 2026, and provided comments to EHB on April 3, 2026 (Attachment A). We appreciate the opportunity to provide comments, which follow.

Comment 1: Section 9.2 Data Gaps

The PEA Report Equivalent adequately addressed Comments 1 and 2 of Attachment A. Specifically, Section 9.2 of the PEA Report Equivalent states in part:

> *"Several broader uncertainties and related pathway questions remain outside the primary scope of this focused off-site screening level evaluation. These include groundwater conditions associated with potential on-site infiltration of surface water, conditions in unsampled subaqueous sediment or other downgradient depositional areas, and the fate of transient deposited particulate matter and/or debris that may have*

> *been redistributed after initial deposition." … "Terraphase understands that certain groundwater and watershed-related issues are being addressed through separate regulatory processes, including investigations being conducted in accordance with orders issued by the Central Coast RWQCB."*

The Central Coast Water Board concurs with the noted data gaps and affirms that Orders R3-2025-0030[1] and R3-2025-0031,[2] issued under California Water Code section 13267, obligate Vistra to perform onsite and off-site investigations to characterize the nature and extent of impacts caused by the January 16, 2025, lithium-ion battery fire at the Moss Landing 300-MW storage facility.

Comment 2: Appendix C – Technical Review of Aiello et al. (2025) Journal Article

Although the Central Coast Water Board appreciates the inclusion of Section 4.6 in the PEA Report Equivalent and the acknowledgement that "the article provides qualitative information suggesting an apparent short-lived enrichment in FpXRF measured surface-soil metal concentrations following the fire event," comments 3 through 9 in Attachment A remain applicable to Appendix C of the PEA Report Equivalent.

If you have any questions regarding this letter, please contact Nick Smaira at **(805) 549-3467** or Greg Bishop at (805) 549-3132 (email addresses are provided in the cc section).

Sincerely,

Greg Bishop, PG, CHg
Supervising Engineering Geologist
Groundwater Protection and
Regional Monitoring Section

for Ryan E. Lodge
Executive Officer

Enclosure(s): Attachment A – Central Coast Water Board Comments of Draft PEA

cc:
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[1] Order R3-2025-0030: https://geotracker.waterboards.ca.gov/?surl=kbvoy
[2] Order R3-2025-0031: https://geotracker.waterboards.ca.gov/?surl=rj2ax

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GeoTracker ID: T10000023147

Attachment A

Central Coast Water Board Comments of Draft PEA, April 3, 2026